

ANALYSIS OF IMPEDIMENTS to FAIR HOUSING CHOICE

City of Ogden

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Introduction

An Analysis of Impediments to Fair Housing Choice (AI) is a comprehensive review of municipal housing, economic, and transportation conditions, as well as public and private sector policies in order to ensure that housing choices and opportunities for all persons in a community are available. Under the HOME and Community Development Block Grant (CDBG) statutes, the AI is a document required by HUD as part of the Five Year Consolidated Plan 2016-2020 (ConPlan). The city must certify to HUD that an AI was conducted and fair housing action steps are being implemented. Goals and objectives are designed to identify and mitigate obstacles to fair housing choice. Many of these are also included in the five year ConPlan.

Since the last Analysis of Impediments to Fair Housing Choice was completed in 2010, Ogden City has actively worked to meet the objectives outlined in the Action Plan and to find ways to mitigate or remove barriers to fair housing. Ogden City has worked with the Utah Fair Housing Forum, Ogden Housing Authority and the Disability Law Center to develop a cooperative approach to develop fair housing choices through the region.

Analysis of Impediments to Fair Housing Choice Process

Developed to accompany the City of Ogden's ConPlan 2016-2020, this AI has been completed to meet requirements of the Housing and Community Development Act and HUD regulations governing the preparation of the ConPlan. To assist in the development of Ogden's AI, University of Utah's Bureau of Economic and Business Research David Eccles School of Business, James Wood, John Downen, DJ Benway and Darius Li (BEBR) were contracted to prepare a Regional Analysis of Impediments to Fair Housing Choice for Weber County – referred to as “Regional AI”, dated May 2014. The Regional AI provides the framework for Ogden's Analysis of Impediments to Fair Housing Choice 2015. In addition to the Regional AI, the City utilized the Weber County Housing Assessment & Plan 2012-2014 (Weber County Housing Plan) which provided supportive data, tables, maps, research and analysis to determining housing needs in Ogden.

The Regional AI and Weber County Housing Plan process included: 1) gathering essential economic and housing data, employing mapping and analysis tools; 2) soliciting and ensuring meaningful community input from key stakeholders; 3) creating and prioritizing inter-jurisdictional objectives, goals and outcomes with planning professionals upon which a collective vision for regional growth could be shaped and adopted by the public, while supporting individual cities in maintaining their unique identities; 4) seeking out community-based organizational partners, and financial resources critical to its eventual implementation; and finally 5) outlining a structure to assist in carrying the process forward.

Impediments to fair housing choice are:

- Any actions, omissions, or decisions taken *because of* one's membership in a protected class which restrict housing choices or the availability of housing choices; and
- Any actions, omissions, or decisions which *have the effect of* restricting housing choices or the availability of housing choices on the basis of one's membership in a protected class.

This report considers impediments to fair housing choice experienced by both the federal protected classes.

Protected Classes

The federally protected classes are:

- Disability
- Familial status
- National origin
- Race
- Color
- Religion
- Sex

I. Demographic Trends and Characteristics

Ogden's Population 82,825 (U.S. Census, 2010)

Ogden's population shows a modest increase over the past ten years. In 2010 the population of the city was estimated at 82,825 by the U.S. Census Bureau, an increase of 7.3 percent since 2000 Table 1. Over the past twenty years the population of Ogden City increased by 22 percent, driven by higher rates of population increase in the 1990s. Ogden is the largest city in Weber County and accounts for about 36 percent of the population of the county. The population growth of Ogden is lower than the 17.7 percent growth rate for the county. Ogden is a mature, older city with little opportunity for new large scale residential development on sizeable parcels of undeveloped land.

Minority Population

1 in 3 persons is a minority in Ogden. (U.S. Census, 2010)

The minority population of Ogden has increased at a much faster pace than the overall population. In 2000 the minority population in the city totaled 16,395 individuals. By 2010 the number of minority individuals in the city had increased by 84.6 percent to 30,268. In 2010 one in three individuals in Ogden City is a minority up from one in five in 2000. The city has by far the largest concentration of minority individuals of any study city. 36.5% of Ogden's Population is a minority, compared to 21.9% in Weber County and 19.6% in Utah.

36.5% minority populations in Ogden, compared to 21.9% Weber County and 19.6% in Utah (2010)

The AI has a broader analytical scope that encompasses issues associated the protected classes covered by the Fair Housing Act. Discrimination is most likely to occur against protected classes with the largest populations. Therefore it is important to provide a demographic context of the protected classes. The Table below shows the number of individuals in protected classes in Weber County and in Ogden City. For example, the minority population (including Hispanics) represents nearly 22 percent of the population of the county. In Ogden 36 percent of the population is minority and 30 percent is Hispanic.

Percent Share of Population by Race and Ethnicity, 2010

	Total Population	White	Minority	Hispanic	African American	Pacific Islander	Asian	Native American	Other
Weber County	100.0	78.1	21.9	16.7	1.2	0.3	1.2	0.5	1.9
Ogden	100.0	67.1	36.5	30.1	1.9	0.3	1.2	0.8	2.3

Source: U.S. Census Bureau.

Percent Share of Disabled Individuals and Selected Households, 2010

	Total Population	Disabled Individuals	Large Family Households	Single Parent with Child Under 18 yrs Households.	Households with Persons over 65
Weber County	100.0%	10.1	17.3	11.2	21.1
Ogden	100.0%	11.7	14.8	14.0	19.6

Source: U.S. Census Bureau.

Other demographic characteristics of Ogden include:

The population of Ogden is getting older. The median age has increased from 28.6 years to 29.6 years. The increase in the median age reflects the modest growth of the city. In 2010 about 31 percent of the population of Ogden was 19 years or younger, about the same percent as the county's 32.9 percent and the state's 34.8 percent.

**Table 1
Ogden: Demographic Characteristics**

	2000	2010	Chg.	Weber County	State of Utah
Population	77,226	82,825	7.3%	17.7%	23.8%
Median Age	28.6	29.6	3.5%	30.7	29.2
65 years and older	8,871	7,790	-12.2%	---	---
Percent 65 years and older	11.5%	9.4%		10.1%	9.0%
19 years and younger	25,057	26,108	4.2%	---	---
Percent 19 years and younger	32.4%	31.5%		32.9%	34.8%
Households	27,384	29,631	8.2%	19.9%	25.2%
Average Household Size	2.73	2.73	0.0%	2.9	3.1
Minority Population*	16,395	30,268	84.6%	---	---
Percent Minority Population	21.2%	36.5%		21.9%	19.6%

**Minority population includes those of the following races: black, American Indian, Asian, Native Hawaiian and other Pacific Islanders and other race. Hispanic is an ethnicity denoted by origins or identification with Spanish or Portuguese speaking countries. Hispanics are included in minority count.*

Source: U.S. Census Bureau, 2000 SF1 and 2010 SF1.

29,631 households in Ogden a 8.2% increase in ten years (U.S. Census, 2010)

The number of households in the city in 2010 totaled 29,631, an increase of 8.2 percent in ten years. The average size of households remains very stable at 2.73 persons per households. The small size of the average household is partly a reflection of the student renters attending Weber State University. Other than Washington Terrace, Ogden has the smallest size households among the study cities.

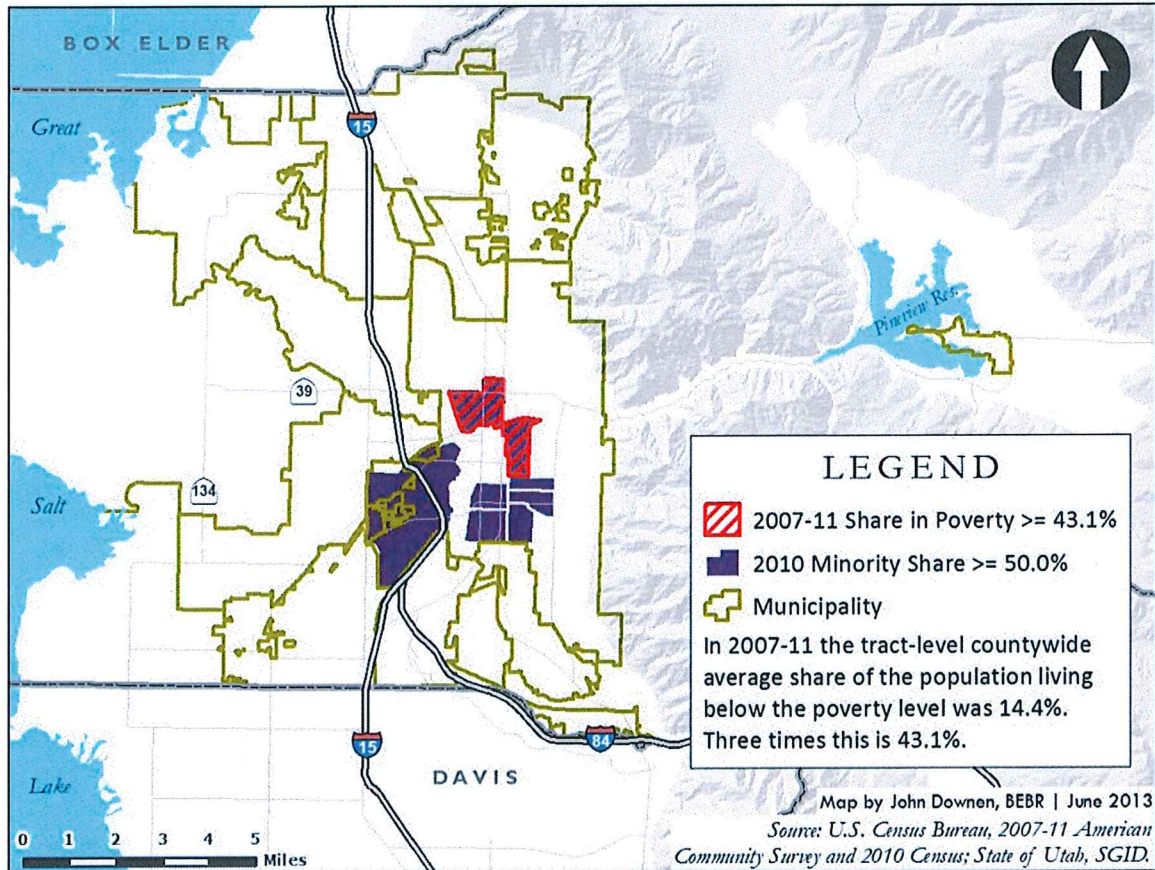
Racially and Ethnically Concentrated Areas of Poverty (RCAP/ECAP)

RCAP/ECAP has 50% or more minority population and three times the poverty rate of the county.

In Weber County, there are four racially and ethnically concentrated areas of poverty (RCAP/ECAP), all of which are in the southern half of the county. HUD defines a racially/ethnically concentrated area of poverty as (1) a census tract where the number of individuals in poverty is equal to or greater than 40

percent of the tract's population, or an overall poverty rate equal to or greater than three times the metropolitan poverty rate and (2) a non-white population, measured at greater than 50 percent of the population (minority-majority).

Figure 2- RCAPs in Weber County



Poverty Rate Three Times County Average

All Weber County racially and ethnically concentrated areas of poverty (RCAP) are in Ogden.

The identification of RCAPs uses a measure of three times the poverty rate of the county. Any tract with three times the poverty rate of the county is a concentration of poverty. *Figure 3* overlays these areas of high poverty with census tracts that have a minority-majority population. All of the tracts satisfying these two conditions are located within the city of Ogden.

The countywide poverty rate is 14.4 percent, so an area is considered highly concentrated when it has 43.1 percent or more of the population living in poverty. In, all cases, the RCAP and ECAP tracts are communities of low-valued homes and with a high proportion of minority renters and homeowners. These areas of high concentrations of minority residents also tend to be in areas of only low- to mid-level access to opportunity. With more affordable housing options in the county, these concentrations of poverty and minority residents would be less severe and more evenly distributed in Weber County.

Renters in RCAP and ECAP Census Tracts

RCAPs and ECAPs in Ogden are characterized by high rates of renter-occupied housing

Weber County's RCAPs and ECAPs are characterized by high rates of renter-occupied housing. Renter-occupied housing has a much higher likelihood of concentrations of low-income, minority renters. The dominance of rental housing in some of the census tracts is striking. For instance in census tract 2009 there were 1,712 occupied housing units and over 83 percent were renter-occupied units (Table 4, Page 41). Furthermore, in RCAP and ECAP census tracts, the rate at which occupied housing units are rented and not-owned never falls below 47.3 percent.

II. Employment Trends and Characteristics

Ogden is the employment center for Weber County with employment of 56,769 in 2009

Ogden is the employment center for Weber County. Ogden had a nonfarm employment of 56,769 in 2009 Table 2. Two-thirds of all jobs in Weber County are located in Ogden City. Ogden is the county seat as well as the largest city and the location of major federal government (IRS) and state government employment (Weber State University). Consequently the government sector is by far the largest and most important employment sector with 28 percent of all workers, a total of 15,700 jobs. The average government wage is nearly \$40,000, about \$2,500 above the average wage in the city. Hill Air Force Base (HAFB), located on the Davis and Weber County border is also a source of relatively high paying government jobs for Ogden residents. HAFB employs about 24,000 Utahns.

The Ogden City labor market has a relatively high share of manufacturing employment. Seventeen percent of all jobs are in manufacturing. Countywide manufacturing represents 13 percent of all jobs and at the state level manufacturing accounts for only 10 percent of total jobs. Manufacturing is the highest wage sector with an average wage of \$48,080.

\$37,500 average wage in Ogden. (2009)

Table 2
Employment Characteristics in Ogden City - 2009

	Number of Firms	Employment	Share of Employment	Average Wage
Mining	0	0	0.0%	\$0
Construction	307	2,433	4.3%	\$41,959
Manufacturing	172	9,810	17.3%	\$48,080
Trade, Trans & Utils	609	8,114	14.3%	\$31,516
Information	26	765	1.3%	\$26,210
Financial Activities	299	2,104	3.7%	\$38,748
Professional & Business Services	435	5,715	10.1%	\$33,516
Health Services and Private Educ.	288	6,868	12.1%	\$40,721
Leisure & Hospitality	222	3,786	6.7%	\$13,188
Other Services	189	1,460	2.6%	\$28,111
Government	118	15,714	27.7%	\$39,818
Total	2,666	56,769	100.0%	\$37,325

D = nondisclosure.

Source: Utah Department of Workforce Services.

The third ranking sector is trade, transportation and utilities. Well over 80 percent of the jobs in this sector are in retail trade. Retail trade employs about 6,500 workers in Ogden City. Health care ranks fourth in share of employment in Ogden City. IHC's McKay Dee Hospital is the largest health care employer.

III. Housing Market Characteristics, Trends and Affordability

Ogden City has a very high share of rental units. Statewide about 30 percent of the occupied housing inventory is rental units, well below the share in Ogden City.

In 2010 the inventory of residential units in Ogden was 32,482 units Table 3. Ninety-one percent of these units were occupied. Owner occupied units accounted for 58 percent of all occupied units while renter occupied units represented 42 percent of the housing inventory. Ogden City has a very high share of rental units. Statewide about 30 percent of the occupied housing inventory is rental units, well below the share in Ogden City. Renters are primarily non-Senior households. Nearly eighty percent of all renters are younger than 55 years. Twenty-one percent of renters are over 55 years old, whereas 42 percent of all homeowners are 55 years or older.

91% of all Ogden housing units are occupied; 58% owner-occupied and 42 renter-occupied

Table 3
Ogden: Housing Inventory Profile - 2010

	Units	% Share
Total Units	32,482	100.0%
Occupied	29,631	91.2%
Vacant Units	2,851	8.8%
Owner Occupied	17,093	57.7%
With Mortgage	13,013	76.1%
Without Mortgage	4,080	23.9%
Renter Occupied	12,538	42.3%

Source: U.S. Census Bureau, 2010.

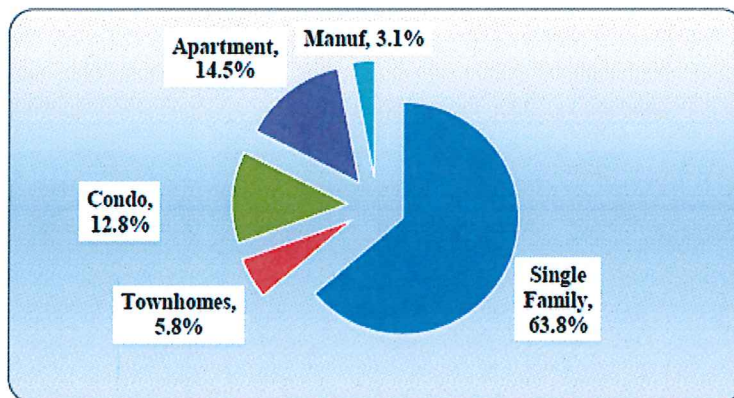
Table 29
Total Housing Units by City

	2000	2010
Weber County	70,454	86,187
Ogden	29,763	32,482
Roy	11,053	12,599
South Ogden	5,459	6,631
Unincorporated	5,004	6,319
North Ogden	4,562	5,799
Washington Terrace	3,162	3,462
West Haven	1,220	3,324
Pleasant View	1,895	2,548
Hooper	1,777	2,156
Plain City	1,001	1,654

Source: U.S. Census Bureau.

Since 2000 Ogden has issued 1,636 permits for single-family homes, 373 permits for apartment units and 328 permits for condominiums Table 8 and Figures -1-2. New home construction has fallen from a high of 250 units in 2003 to 40 units in 2010, a decline of 85 percent.

Figure 2
Ogden: Percent Share of Residential Construction 2000-2010



Homeownership

Whites comprised 79 percent of all homeowners in Ogden. Hispanics own 17 percent of all owner occupied units, a relatively high share reflecting the diversity of the city. Very few other minority households own homes in Ogden Table 6. Sixty-five percent of the 12,500 renter households are whites. Hispanics account for 26 percent of renter households and blacks 3.1 percent Table 7.

Table 6
Ogden: Owner Occupied Units by Race and Ethnicity - 2010

	Units	% Share
Owner-occupied housing units	17,093	100.0%
White alone householder	13,455	78.7%
Black or African American alone householder	213	1.2%
American Indian and Alaska Native alone householder	74	0.4%
Asian alone householder	215	1.3%
Native Hawaiian and Other Pacific Islander alone householder	26	0.2%
Some Other Race alone householder	17	0.1%
Two or More Races householder	168	1.0%
Hispanic or Latino	2,925	17.1%

Source: U.S. Census 2010.

79% of Ogden homeowners are White and 17% are Hispanic.

Table 7
Ogden: Renter Occupied Units by Race and Ethnicity - 2010

	Units	% Share
Renter-occupied housing units	12,538	100.0%
White alone householder	8,208	65.5%
Black or African American alone householder	389	3.1%
American Indian and Alaska Native alone householder	173	1.4%
Asian alone householder	137	1.1%
Native Hawaiian and Other Pacific Islander alone householder	31	0.2%
Some Other Race alone householder	22	0.2%
Two or More Races householder	266	2.1%
Hispanic or Latino	3,312	26.4%

Source: U.S. Census 2010.

Housing Affordability

Ogden housing prices are 14% lower than the national average.

Ogden listed as one the ten most affordable housing markets in the nation by the CNNMoney website at www.money.cnn.com. While County-wide, incomes are not high as stated by this article, in comparison to national averages, Ogden's average incomes are not low but of a moderate level. Housing prices are also 14 percent lower than the national average. In the following assessment details it is clear that Ogden has a surplus of affordable housing options in place and the goal will be to focus on rehab and repair of existing properties as well as serving additional special needs populations.

"Ogden is the most affordable housing market of any city in the Wasatch Front." BEBR

Deficit or Gap of Affordable Housing by Participating Cities

The following table lists the number of units needed in each city for three income categories, Extremely Low Income which is 30% and below of AMI, Very Low Income which is 30 to 50% of AMI and Low Income which is 50 to 80% of AMI.

	Extremely Low Income	Very Low Income	Low Income
Roy	566	865	1,282
Plain City	88	163	249
Hooper	98	186	294
Washington Terrace	141	-27	65
West Haven	117	174	174
North Ogden	329	478	782
Ogden	177	-2,313	-1,861
South Ogden	320	317	479
Pleasant View	141	181	255
Unincorporated	145	265	344
Total	2,123	288	2,031

Source: HUD Sustainable Communities data.

Median sales price of an existing home in Ogden is \$100,000 lowest of any Weber County city.

The median sales price of an existing home in Ogden is \$100,000, the lowest of any of the Weber County study cities. The affordability is extreme in Ogden City. Ninety-one percent of all homes sold in the past five years were affordable to households at 80 percent Area Median Income (AMI) and 52 percent were affordable to households at 50 percent AMI. Of the 921 condominiums sold since 2007, 895 or 97.2 percent were affordable to moderate income families and 68 percent affordable to low income families at 50 percent AMI.

Median sales price of an existing home in Ogden is \$100,000
Median price for a new home in Ogden \$160,000 affordable to moderate income households.

New home construction in Ogden is affordable to moderate income families (80 percent AMI). The median price of a new home has been around \$160,000 over the past several years. At current interest rates a moderate income household should be able to afford a home priced at \$200,000 or less.

80% of new homes sold in Ogden were affordable and
90% of existing homes sold were affordable to moderate income families (80% AMI), since 2005

Of the nearly 582 new homes sold since 2005, 80% or 460 were affordable to moderate income households Table 9. However, new homes were not affordable to low income households. In the past five years no new homes have been built for \$120,000 or less, a price affordable to households at 50 percent of AMI.

The sale of existing homes shows that nine out of ten homes sold were affordable to the moderate income household. Of the 6,059 homes sold 5,516 were affordable to households at 80 percent AMI Tables 10-12. For low income households 52 percent or 3,136 homes were affordable to low income (50% AMI) households. Over the past five years 921 existing condominiums were sold in Ogden City. Ninety-seven percent were affordable to moderate income (80% AMI) households and 68 percent were affordable to the low income households Tables 13-14.

Housing prices have fallen 22%, condominiums prices have fallen 26% in the past four years.

Housing prices in Ogden have fallen 22 percent in the past four years and condominiums prices have fallen 26 percent Table 10. The sample of homes sold is relatively small but sold data do provide an indication of the direction of housing prices. Housing prices are declining in part due to short sales and foreclosed properties. Short sales and foreclosures account for about 30 percent of all home sales Table 15. These properties are heavily discounted and push the median sales price down. Median sales price of REO properties in 2011 was \$59,000 Tables 16.

The concentration of moderate and low priced housing in Ogden results in little price diversity.

Life cycle housing is not a housing alternative. Families desiring to stay in the community but wanting to move to a larger, higher quality home have very few housing choices other than to move to other county alternatives.

It will require a broader regional effort to successfully de-concentrate segregated neighborhoods in Ogden

In order to advance housing choice, the City strives to find the right balance between reinvestment and redevelopment in racially concentrated areas versus development of new housing opportunities inside and outside of such areas. However, with half of Ogden's Census Tracts have a population reaching more than 20% poverty, the City is severely limited in achieving this goal. Consequently, it will require a broader regional effort to successfully de-concentrate segregated neighborhoods in Ogden City.

Rental Housing

Nearly all rental housing in Ogden is affordable to LMI households.

Nearly all rental housing would be affordable to Low- to-Moderate Income (LMI) households given the low housing costs in the City.

Rental housing is highly concentrated in Ogden, 60% of Weber Co. rentals units are in Ogden.

Rental housing is highly concentrated in Ogden City with nearly 60 percent of all rental units in the county located in Ogden. Roy is the only other city with more than 10 percent of their housing stock devoted to rental housing. Many neighboring cities have less than 1 percent of housing stock in rental units (Table 32 Page 35). Map 2 (Page 32) shows number of rental units by census tract in Ogden..

Rental Assisted Housing

81% of Weber County vouchers holders live in Ogden.
76% of all County tax credit units are in Ogden.
89% of County HUD deep subsidized housing units are in Ogden.

Over 70 percent of Weber County rent-assisted households (vouchers, tax credit units, public housing units) live in Ogden and 60 percent of all renters. Eighty-one percent of voucher holders also live in Ogden and 73 percent of all tax credit units are located in the city. This concentration is a reflection of zoning ordinances and policies of many of the non-entitlement cities. Eight cities have less than 20 percent rental inventory; including Roy the second largest city in the county (population 37,500) with proximity to I-15 and large employment base and a FrontRunner station.

Restricted supply of Section 8 Vouchers has a disparate impact on minorities, disabled and large families.

The limited supply of Section 8 vouchers has a disparate impact on minorities, Hispanics, disabled individuals and large families. These protected classes currently represent about 60 percent of voucher holders in Weber County illustrating the high demand among protected classes for rental assistance. While the limited supply of vouchers is a federal funding and policy issue, all entitlement jurisdictions cities should understand the need and the shortfall for vouchers and develop mitigating strategies that will assist very low and extremely low-income renter households of protected classes.

A high percent of tax credit and deep subsidy units are located in Ogden. Seventy-six percent (1,362 units) of tax credit units are located in Ogden and 89 percent (774 units) of deep subsidy HUD units are in Ogden.

IV. Housing Needs Summary

Surplus of Affordable Rental Housing in Ogden

Ogden has a surplus of 4,028 affordable rental housing units.

HUD data shows a need of 177 units for extremely low income households (<30% AMI) in Ogden, a surplus of 2,313 units for very low income households (30%-50% AMI) and a surplus of 1,891 units for low income households (50%-80% AMI). The surplus of affordable units is due, in part, to the large number of affordable rental units in the city. Low rental rates are partly a reflection of the student market which tends to hold rents down.

Table 8
Deficit/Surplus of Affordable Rental Housing Units by Income
(shaded area = affordability)

	<30% AMI Deficit/Surplus	30%-50% AMI Deficit/Surplus	51%-80% AMI Deficit/Surplus	Total
Farr West	-85	-174	-264	-523
Harrisville	-98	-189	-288	-575
Hooper	-98	-186	-294	-578
Marriott-Slaterville	-39	-59	-105	-203
North Ogden	-329	-478	-782	-1,589
Ogden	-177	+2,313	+1,891	+4,028
Plain City	-88	-163	-249	-501
Pleasant View	-141	-181	-255	-578
Riverdale	-168	-200	-315	-683
Roy	-566	-865	-1,282	-2,712
South Ogden	-320	-317	-479	-1,116
South Weber	-106	-172	-249	-526
Washington Terrace	-141	+27	-65	-179
West Haven	-117	-174	-174	-464
Weber County	-2,678	-1,207	-3,442	-7,327

Source: HUD Sustainable Communities spreadsheet for grantees.

Table 8 shows the need for affordable units by city. These estimates were generated by HUD in 2011 for the Equity Assessment analysis required of Sustainable Communities grantees. A HUD Sustainable Communities grant was awarded to Salt Lake County as the fiscal agent, and Envision Utah and Wasatch Front Regional Council as the managing partners. This grant includes a regional housing plan for the four Wasatch Front Counties; hence HUD developed the affordable housing need estimates that appear in Table 42. The negative numbers for low (80% AMI in HUD terminology) and very low (50% AMI for HUD) income households in Ogden City reflect the extreme affordability of the city, both in terms of rental and owner occupied units. However, the need for extremely low income (30% AMI) housing units in Ogden is 177 units. The cumulative number of units needed for the cities studied indicates an important fact: a shortage of affordable housing for extremely low income households.

Aging Housing Stock

Ogden's old housing stock increases the need for housing rehab programs.

In Ogden the number of housing units increased by 2,700 units over the past ten years, a 9 percent increase in the inventory. Ninety percent of the housing inventory of Ogden City was built prior to 2000. The housing stock in Ogden is relatively old with a median age of 45 years. The “old” housing stock increases the need for programs that are targeted at addressing deferred maintenance, rehabilitation and improving energy efficiency.

Affordable Housing Needs and Protected Classes

Affordable rental housing is the greatest housing need for protected classes. Over half of all minority households rent and these households are more likely to be very low or extremely low income households.

Rental housing is the primary source of housing for protected classes.

Although Ogden has a surplus of affordable rental housing, the most critical unmet housing needs exist in the very low and extremely low-income households. These households comprise a significant share of the county’s population. One-in-four households in the county have incomes below 50 percent of the Area Median Income (AMI). Of the 21,260 renter households in Weber County 45 percent or 9,500 households were very low and extremely low-income households *Table 1*. There were about 5,520 renter households with extremely low-income. Again these renter households are much more likely to be households of protected classes; minority, Hispanic, disabled, or large family.

While an excess of supply of affordable housing in Ogden City has depressed housing sales. There is a disparity in housing markets among cities within Weber County, with the lowest sales prices occurring in Ogden. The City’s NRSA minority households have a median income equivalent to only 61% of the White household income, minority residents are more likely to experience neighborhood limitations in locating an affordable home to purchase.

The need is to expand affordable housing in non-concentrated areas.

This situation underscores the need to expand affordable housing opportunities in non-concentrated areas, though it would not be possible for government to subsidize enough housing to satisfy the unmet need of persons who are not paid a living wage.

Minimum-wage earners and single-wage-earning households cannot afford a housing unit renting for the HUD fair market rent in Ogden. This situation forces these individuals and households to double up with others or lease inexpensive substandard units. Minorities and female-headed households are disproportionately impacted due to their lower incomes.

Supportive Housing for Disabled

There are currently 1,100 disabled individuals living in rental units in Weber County that are very low-income households with severe housing cost burdens and non-elderly. These individual confront many housing impediments. A targeted effort to develop HUD 811 housing would provide supportive rental housing for these extremely low and very low-income disabled adults. A coordinated approach should be considered by the two entitlement cities to develop on a regular basis 811 projects to further fair housing for the disabled. These efforts should include a public private partnership with non-profit developer(s) and approached from a regional perspective; that is coordinated among the entitlement cities and non-entitlement cities.

V. Policies and Practices

Public Policy, Zoning and Land Use Element

Lack of a regional approach is likely one cause of the concentration of affordable rental housing and low and very-low income households in Ogden.

Many impediments to fair housing choice are common impediments shared by most cities within a region. The most effective mitigation to these common impediments is a coordinated, shared approach by the cities in the region. Collaboration between service providers and jurisdictions to develop a regional approach should be pursued to reduce the concentration of protected class households in Ogden. Lack of a regional approach is likely one cause of the concentration affordable rental housing and low and very low-income households in Ogden and some of the cities in the south-end of the county.

Ogden does not need to provide incentives for affordable housing.

Ogden has a diversity of residential densities accommodating various type of development from low density single family to high density mixed use and TODs. Group homes, an important housing type for HUD, probably are restricted in some non-entitlement cities. Ogden has inclusionary zoning and allows accessory units. The city does not have density bonuses for affordable housing or fee waivers. Ogden does not need to provide incentives for affordable housing.

“If some of the northern cities provided incentives, over the long-term there would be less concentration of protected classes in Ogden and housing opportunities would be expanded for protected classes.” BEBR

Nimbyism, Zoning, and Land Prices

If the higher income cities in Weber County do not allow increased levels of affordable housing, particularly rental housing, protected classes will become more highly concentrated and segregated by 2020 thereby further limiting housing choice. BEBR

Regionally, Nimbyism, Zoning, and Land Prices Lead to Concentrations of Affordable Housing and greatly impacts and potentially further concentrates low-income and minority housing in Ogden. “Zoning practices and development approvals have a greater impact than any other factor on fair housing choice. If the higher income cities in Weber County do not allow increased levels of affordable housing, particularly rental housing, protected classes will become more highly concentrated and segregated by 2020 thereby further limiting housing choice.”

Lack of housing price diversity in some non-entitlement cities in the county, due in part to local zoning, has led to concentrations of low-income and poor minorities and ethnic groups in many neighborhoods in Ogden.

Transit Oriented Developments (TOD)

To avoid impeding fair housing choice for protected classes, housing projects at Transit Oriented Developments (TOD) should include housing types and prices that are consistent with the housing needs of protected classes as outlined in the Fair Housing and Equity Assessment. TODs offer a rare opportunity to bring together affordable housing, proximity to employment, and access to public transportation for *transit dependent households*, which are disproportionately minorities and the disabled. There is a TOD in downtown Ogden at 24th Street and Wall Avenue.

Utah State Legislature passed HB295

The requirements of HB295 have led cities to consider affordable housing issues on a narrow jurisdictional basis, which in some cases has resulted in impediments to fair housing.

In 1996 the Utah State Legislature passed HB295 *Providing Affordable Housing*. HB 295 states, “the availability of moderate income housing is an issue of statewide concern.” To this end “municipalities should afford a reasonable opportunity for a variety of housing, including moderate income housing to meet the needs of people desiring to live there.” This legislation provided very few incentives for compliance however, most cities have completed an assessment of affordable housing need, albeit in many cases cities have failed to update the housing assessment as required by the legislation. The requirements of HB295 have led cities to consider affordable housing issues on a narrow jurisdictional basis, which in some cases has resulted in impediments to fair housing. Focusing solely on “their” jurisdiction, a city is left without any regional context regarding the location and need for affordable housing and the disparities of opportunities across cities in the region (county). Housing markets do not stop at a jurisdiction’s boundaries. Housing markets are highly interrelated and interdependent with surrounding jurisdictions. Weber County is a regional housing market and Ogden is a subset of this regional market.

Since passage of the original affordable housing statute the state’s population has increased from two million to three million. It is time to revisit Utah’s affordable housing legislation and amend the legislation to encourage a regional (county) context of affordable housing needs. Utah State Department of Community and Housing, Utah Housing Corporation, local government officials, non-profit advocacy groups, and other stakeholders should be included in a working group to update HB295.

Language Assistance Plan and Fair Housing Infrastructure

The absence of language access plans and the availability of language interpreters in the fair housing offices of entitlement jurisdictions disproportionately impacts minorities, ethnic populations, and immigrants. Ogden’s fair housing infrastructure is one of the most complete of any city in the Wasatch Front. However, the fair housing website is only in English. The city does provide language interpreters.

Ogden’s Fair Housing infrastructure is one of the most complete, but is limited to English.

VI. Legal Status / Fair Housing Complaints

Utah Antidiscrimination and Labor Division

The Utah Antidiscrimination and Labor Division data on discrimination complaints also includes complaints made to HUD. Over the past six years, 38 complaints in Weber County have been filed see *Table below*. The basis of 63 percent of these complaints has been discrimination due to disability. Disability leads all categories in perceived reason or basis for the complaint followed by retaliation at 26

percent and family status at 16 percent. These data raise concerns that discrimination is impeding fair housing choice for households with disabled individuals and “too” many family members.

63% of Weber Co FH complaints deal with denial of a “reasonable accommodations”

**Housing Discrimination Complaints Filed to State of Utah and HUD
(Weber County)**

	Disability	Sex	Family Status	Race	Retaliation	Source of Income	Religion	National Origin	Color	Total
2007	7	1	4	1	3	1	0	1	0	11
2008	8	2	0	3	3	1	0	2	0	13
2009	2	1	1	1	1	0	0	0	0	3
2010	3	0	0	0	0	0	0	1	0	4
2011	3	0	0	0	3	0	0	0	0	3
2012	1	1	1	0	0	1	0	1	0	4
Total	24	5	6	5	10	3	0	5	0	38
Share	63.2%	13.2%	15.8%	13.2%	26.3%	7.9%	0.0%	13.2%	0.0%	100.0%

Source: Antidiscrimination & Labor Division, State of Utah

Utah Legal Services

Utah Legal Services data suggest there is no race or ethnicity discrimination in filing FH complaints.

Utah Legal Services data show that 48 percent of “Cased Call” reports the basis of the complaint as disability. The race and ethnicity of individuals filing complaint is consistent with state demographic patterns. Seventy-five percent of those filing complaints were white and 13 percent were Hispanic. Data in (Tables 23-24 Page 45) do not suggest, at least for those filing complaints, a significant level of discrimination based on race or ethnicity.

Disability Law Center

DLC provides free advocacy to all protected classes in filing a FH complaint.

The Disability Law Center also fields calls regarding housing discrimination. Their data does not show the basis of the discrimination but show that in fiscal year 2013 50 individuals in Weber County filed complaints regarding housing discrimination *Table 25*. Of the complaints filed 84 percent were by non-Hispanic whites and 66 percent were filed by women. The Disability Law Center is in the process of developing a comprehensive survey regarding housing, transportation, and employment. The housing section of the survey will ask three or four detailed questions regarding housing discrimination. The results should provide further insight into the level of housing discrimination based on disabilities.

Reasonable Accommodations for the Disabled

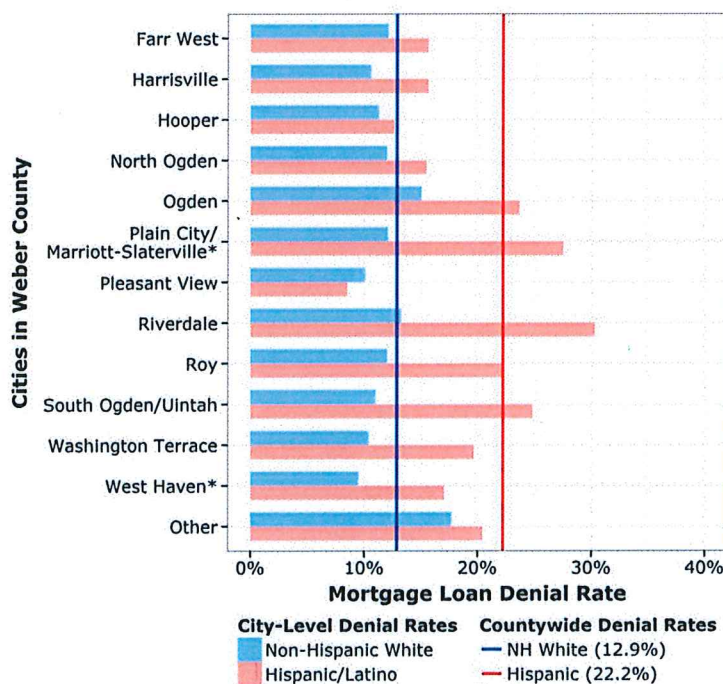
Many landlords are not aware of Fair Housing Act requirement to provide “reasonable accommodations” to persons with a disability

The number of disabled individuals in Weber County is estimated by the American Community Survey, U.S. Census Bureau to be 23,000 individuals, about 11 percent of the population. Under the Fair Housing Act housing providers must make “reasonable accommodations in rules, policies practices, or services when such accommodations may be necessary to afford a person with a disability the equal opportunity to use and enjoy a dwelling.” Currently over one-third of all rental housing in Weber County is a detached single family unit. Many of the landlords who are renting homes or small “mom and pop” housing providers are not aware of the full implications of the Fair Housing Act and the “reasonable accommodations” provision. The Fair Housing infrastructure in all cities has not systematically addressed the education of landlords regarding “reasonable accommodations.”

VII. Private Policies and Practices: Lending

The disparities in homeownership across racial and ethnic lines reflect only the symptoms of underlying impediments in the home mortgage application process. The Home Mortgage Disclosure Act (HMDA) data was compiled for Weber County to better understand the barriers that members of the protected class face in obtaining mortgages. For illustrative proposes, non-Hispanic white applicants were compared with Hispanic/Latino applicants for most metrics derived from the HMDA data. Homeownership and housing stability are two dimensions of housing opportunity that can be assessed using HMDA data by examining mortgage application outcomes and the high interest lending practices. The focus of analysis is on Ogden which accounts for 78 percent of the county’s Hispanic mortgage applications and have Hispanic denial rates roughly twice as large as those of non-Hispanics.

Figure 1 - Percent of Mortgage Loan Applications Denied by Race/Ethnicity in Weber County Incorporated Cities, 2006–2011



Source: HMDA LAR Raw Data by MSA (2006–2011) Note: The categories Plain City/Marriott-Slaterville and West Haven include unincorporated areas in the western region of Weber County, which are contained within the census tracts that encompass the three cities.

Figure 2 - Percent of Mortgage Loan Applications (At or Below 80% HAMFI) Denied by Race/Ethnicity in Utah County Incorporated Cities, 2006–2011

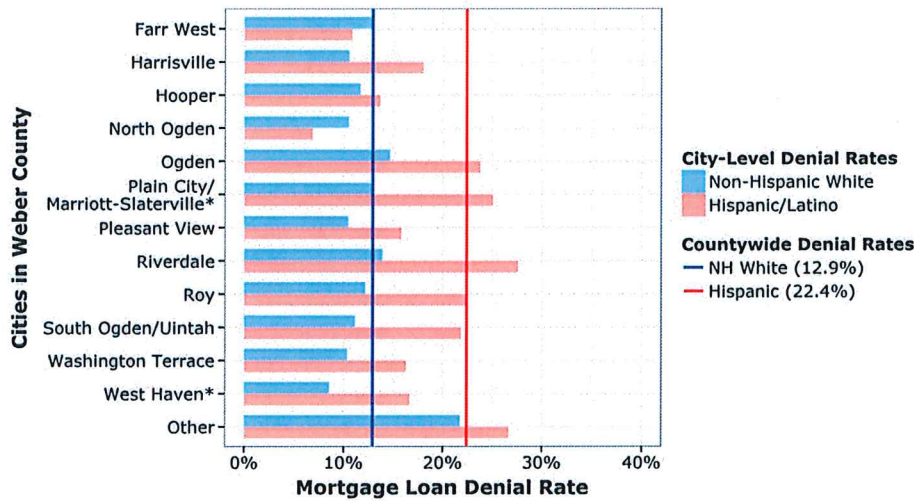


Figure 3 - Percent of Mortgage Loan Applications (Above 80% HAMFI) Denied by Race/Ethnicity in Weber County Incorporated Cities, 2006–2011



Source: HMDA LAR Raw Data by MSA (2006–2011)

Note: The categories Plain City/Marriott-Slaterville and West Haven include unincorporated areas in the western region of Weber County, which are contained within the census tracts that encompass the three cities.

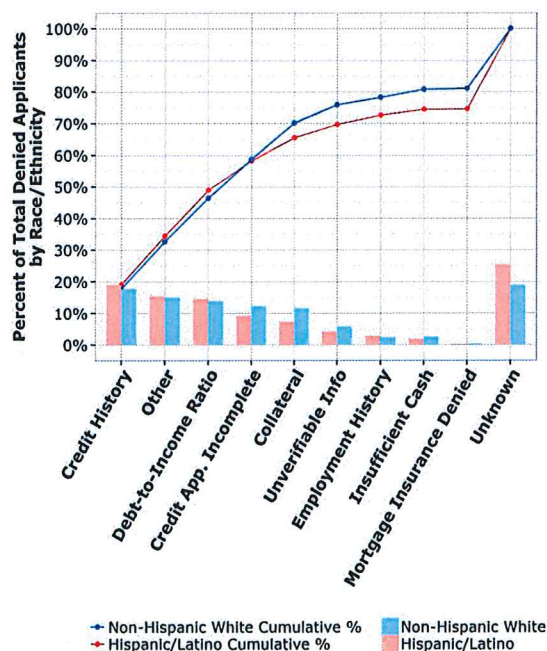
Figure 2 shows the denial rates among white and Hispanic applicants with reported incomes at or below 80 percent HAMFI (median family income), while Figure 3 shows the denial rates for applicants with reported incomes above 80 percent HAMFI. Note that the reported incomes for applicants from 2006 to 2011 are adjusted relative to the median family income for the year that they filed their mortgage applications.

The overall county-level denial rates do not change across groups. The Hispanic denial rate remains at levels around 22 percent, while the white denial rate is roughly 13 percent—regardless of income bracket. More pertinent are the cities with the largest Hispanic application volume such as Ogden and Roy, which have denial rate gaps greater than 9 percentage points regardless of income brackets. Similarly, in West Haven, which has the third highest application volume in Weber County, the Hispanic denial rate is sustained at levels above 15 percent for both income brackets, whereas non-Hispanic denial rates are below 10 percent. Thus, while many smaller cities have fluctuations in denial rates attributed to low application volume, the cities with the largest Hispanic application volume have not experienced clear denial gap closures with the disaggregation by income bracket.

The significantly higher denial rates for home mortgages for Hispanics suggests a financial impediment to fair housing choice for Hispanics and all minorities. Denial rates for Hispanics in Ogden are twice as high as denial rates for whites even after adjusting for income. Furthermore, if a Hispanic household receives loan approval that household is nearly two times as likely to have a high interest loan as a white household.

Ogden Hispanics are twice as likely to be denied a mortgage and once approved two times more likely to have a higher interest loan than white households (even adjusted for income).

Despite the persistent disparity in mortgage outcomes between the two groups, other factors such as credit history could be the driving force behind the mortgage denials. Note that 19 percent and 25 percent of the denials for white and Hispanic/ Latino applicants, respectively, did not have a documented reason for denials. Roughly 30 percent and 28 percent of the denials among non-Hispanic white and Hispanic/Latino applicants, respectively, are due to poor credit history or incomplete credit applications. However, given the large share of denied applications with no documented reasons and the lack of detailed credit history information, the HMDA data cannot conclusively reveal the reasons behind the denied mortgage applications.



Thus, income could be one minor driving force in the disproportionality of mortgage denials among the lowest-income Hispanic applicants but does not explain the pervasive approval rate gaps across nearly all income deciles.

V. Impediments to Fair Housing Choice and Action Steps

IMPEDIMENT 1

Uneven Fair Housing infrastructure - Fair Housing brochures, webpage and materials are printed only in English, limiting the available of Fair Housing information to non-English speaking persons. There is a need to improve language access for people with Limited English speaking proficiency who seek information regarding Fair Housing.

ACTION ITEMS

1. Develop and implement a **Language Assistance Plan (LAP)** for Ogden City. Federal policies under Title VI of the 1964 Civil Rights Act set benchmarks by which jurisdictions like Ogden must assure meaningful access to federally funded services. Under guidelines issued by the HUD, cities that receive CDBG and HOME program funds, are required to evaluate the need for language assistance services by individuals with limited English speaking proficiency (known as LEP individuals) who come into contact with city services by examining four factors: (1) the number of LEP individuals likely to be needing and requesting services; (2) the frequency of contact city agencies have with LEP Individuals; (3) the nature and importance of the contacts LEP Individuals have with city agencies; and (4) the resources available for language assistance activities. A LAP will identify ways in which language assistance will be provided – thereby outreaching effectively to the LEP community regarding Fair Housing Choice, as well as, other City services.
2. Translate the City's **Fair Housing webpage** and vital program documents in Spanish; and print from HUD's website and make available informational pamphlets and Fair Housing brochures for LEP individuals.
3. Continue to provide citizens with consistent **Spanish translation services**. Utilizing a private contractor to test and certify employees, so that quality translation services are available to LEP individuals.
4. Establish a centralized list of resources for assisting LEP individuals, by utilizing the City's Intranet. Posting the LAP and a list of City employees who are certified interpreters on the City's Intranet will assist in consistent and even Fair Housing infrastructure, as well as, consistent access to City programs.
5. Encourage the **Disability Law Center (DLC)** (a recipient of HUD's Fair Housing Initiatives Program (FHIP) Grant) to take the lead in establishing a database to track Fair Housing complaints or legal actions for the region, thereby establishing a centralized administration of Fair Housing infrastructure.
6. Participate in a **Regional Analysis of Impediments to Fair Housing Choice**.

IMPEDIMENT 2

Deteriorating Quality of Housing Inventory in RCAPs- Ogden's housing stock is aging in Ogden's NRSA. This along with the prevalence of low-income households and minority concentrations in the NRSA, presents the challenge of deferred maintenance and deteriorating quality of housing stock. Homes in the East Central and NRSA particularly, are disproportionately occupied by minority and disabled individuals (seniors with a highly likelihood of disability). An analysis of age and value of homes in Ogden indicates several neighborhoods where there are a large number of homes built prior to 1950 and valued at less than \$100,000. There is a relatively high probability these homes are subject to deferred maintenance

and deteriorating quality. Programs to rehabilitate, renovate, and repair structures and/or improve energy efficiency would affirmatively further fair housing.

ACTION ITEMS

1. Implement **Quality Neighborhoods Program** to target resources to improving the condition of housing in the NRSA. Quality Neighborhoods works towards providing additional housing options, and when possible, developing new quality housing available to LMI and moderate-income households in the NRSA, to improve overall housing conditions through the reduction and elimination of substandard housing, to provide more price diversity, to encourage life cycle housing options, and to de-concentrate poverty. Newly constructed housing units will be built with three bedrooms and when possible with basements to accommodate larger families. Due to the water table, basements are not always an option.
2. Partner with local lenders and non-profit groups and social investment companies to expand CED's access to funding to improve the quality of housing in the NRSA that has two RCAP Census Tracts.
3. Continue to implement HUD's **Asset Control Area (ACA)** program to improve the quality of housing in Ogden's high minority and high poverty East Central neighborhoods.
4. Provide assistance for housing rehabilitation to all income levels through the **Home Exterior Loan Program (HELP)**. The HELP program provides a low interest loan to homeowners in need of exterior repairs and repairs to address housing code issues, improving the quality of housing in Ogden.
5. The City maintains a comprehensive **infrastructure plan** which has an infrastructure replacement schedule that bonded for significant improvements in the NRSA area over the next decade. When infill projects require consolidation of properties, infrastructure improvements are included and implemented when possible in the project.
6. Collaborate with Ogden School District, Utah State Division of Workforce Services (DWFS) and community service agencies to align the workforce with industry educational standards and to improve educational opportunities in the NRSA through programs such as STEM, Custom Fit, Next Generation Kids, Utah Advanced Materials and Manufacturing Initiative (UAMMI) and Promise Zone. Ogden School District 12,400 students. Over 56% of Ogden students are ethnic minorities and 75% come from low-income homes. The district is celebrating four years of progress in student proficiency and graduation rates.

To end the concentration of poverty in the NRSA, the City has actively participated and collaborated with and will continue to support the following initiatives:

- a. **STEM** goals include increasing students' mastery levels in mathematics, increasing enrollment in current engineering and information technology certificate programs. STEM after-school programs, camps, tutoring and mentoring programs will also be developed and implemented, along with teacher training and STEM teacher incentive pay programs. The City has partnered with Ogden and Weber School Districts for a STEM outreach program.
- b. Funded by Utah DWFS, as part of the Utah Intergenerational Poverty Mitigation Act passed in 2012, the **Next Generation Kids** program works toward ending intergenerational poverty by disrupting the cycle of poverty through working with parents and kids together.
- c. **Custom Fit Training & Workforce Development Program** is an employer training service provided by the Ogden Weber Tech College. Custom Fit Training offers flexible, customized training programs, designed to enhance and retain the skills and abilities of employees in order to keep Utah companies competitive and stimulate economic development.
- d. **Utah Advanced Materials and Manufacturing Initiatives (UAMMI)** is a regional effort to advance educational opportunities and works to expand economic opportunities through capital development, workforce development, economic ecosystem (infrastructure)

development, market development and most important international competition and innovation development.

- e. **Promise Zones** is a HUD initiative to provide interagency collaborative support and grant funding to revitalize high poverty communities where the federal government will partner with and invest in communities to create jobs, leverage private investment, increase economic activity, expand educational opportunities, and reduce violent crime.
7. Continue to implement **Transit Oriented Development (TOD)** opportunities.
- a. In walking distance to Ogden's Historic 25th Street, the Central Business District, and the IRS (a major area employer) Ogden's intermodal hub has provides transportation to employment centers for many Ogden residents. In an effort to redevelop under-utilized property and support the development of a Transit Oriented Development (TOD) near Ogden's intermodal transit hub, Ogden has committed to the acquisition of properties adjacent to the UTA parcels located adjacent to the intermodal hub. The properties Ogden plans to acquire are bordered by Wall Ave, Reeves Ave, 21st and 22nd Streets, and equate to approximately 7.5 acres of land. These properties, as well as a portion of the UTA parcels, are within the existing 21st – 22d Street Redevelopment Area, and are part of Ogden's existing Wall Avenue Retail Corridor Master Plan. They are also conveniently located within walking distance of the IRS campus, which is one of Ogden's largest employers. This location offers very high visibility with frontage on Wall Avenue, which has a traffic count of 23,125 cars per day. Ogden's objective is to create a complimentary use to UTA's existing infrastructure and developable land, while adhering to the existing Wall Avenue Master Plan. In addition, increasing Ogden's sales and property tax bases are primary goals along with providing a diverse mix of uses, along with affordable housing units available to LMI households and quality housing units available to moderate income households that would best fit this location and assist Ogden in reaching these goals.
 - b. Partner with UTA to complete the Ogden-Weber State University Transit Project study. The study's purpose is to Increase mobility, connectivity and travel choices between downtown Ogden and the WSU/McKay-Dee Hospital area; Promote economic and community development and create jobs in Ogden City; Support local and regional land use initiatives; Increase ridership, attract more local riders and provide improved access to overall transit system; Improve regional transit reliability; Provide increased connectivity to bicycle and pedestrian friendly facilities; and develop a project that has strong local support and is competitive for federal funding.
 - c. Ogden City provides a Lunch and Learn for employers to address TOD housing options to their employees.
8. Identify solutions to **food deserts** in Ogden.
- a. The City will partner, when possible, with investors and property owners to develop the 24th Street Village Center located in Census Tract 2009 identified as a RCAP and that has few grocery stores and limited access to food options.
9. De-concentration of low-income housing and poverty in Ogden.
- a. With an excess of 4,000 affordable housing units in Ogden while neighboring communities have a deficit of affordable housing, the City has worked, negotiated and tried various approaches to partner with local communities and Weber County to bring about equitable solutions to RCAP's. In addition, the City has engaged the State to develop solutions. Without a state or federal mandate or incentives, other communities are unwilling to take efforts to provide LMI housing in their communities, which would work to end the concentration of low-income housing in Ogden. If the State or Federal government do not provide the pressure or support needed to end nimbyism in Weber County, the City may continue to face the regional problem of RCAP's alone with very limited authority and funding to do so.

IMPEDIMENT 3

Disproportionate impact from Good Landlord program - (“refuse to rent to applicants with certain criminal backgrounds” – minorities disproportionately have higher criminal backgrounds.) The purpose of the program is to eliminate code violations and public nuisances among rental units. In exchange for running background checks and refusing to rent to applicants with certain criminal pasts, landlords receive a financial incentive. Many respondents of the Utah State Fair Housing Survey felt that these programs create barriers to housing for those individuals with past transgressions. Ogden’s good landlord program may be overly restrictive and have *disparate impacts* on protected classes. The requirements of the program should be refined. The program currently requires landlords to “refuse to rent to applicants with certain criminal backgrounds.” Although not intended to discriminate against protected classes, if minorities disproportionately have criminal backgrounds the Good Landlord program could be deemed a violation of the Fair Housing Act.

ACTION ITEMS

1. Continue to ensure consistency with Utah State law and evaluate program requirements relative to desired outcomes.

IMPEDIMENT 4

Landlords lack familiarity with Fair Housing Act - (many landlords are not aware of their responsibilities to provide “reasonable accommodations” as required by the Fair Housing Act.) The number of disabled individuals in Weber County is estimated at 23,000 individuals, about 11% of the population. Under the Fair Housing Act housing providers must make “reasonable accommodations in rules, policies practices, or services when such accommodations may be necessary to afford a person with a disability the equal opportunity to use and enjoy a dwelling.” Currently over one-third of all rental housing in Weber County is a detached single family unit. Many of the landlords who are renting homes or small “mom and pop” housing providers are not aware of the full implications of the Fair Housing Act and the “reasonable accommodations” provision. The Fair Housing infrastructure in all cities has not systematically addressed the education of landlords regarding “reasonable accommodations.

ACTION ITEMS

1. Review the Good Landlord curriculum to ensure it adequately addresses the Fair Housing Act and particularly the Reasonable Accommodations requirements for landlords.
2. Work with state agencies and DLC to promote fair housing educational opportunities.
3. Work with the Utah Apartment Association’s to increase attendance at Fair Housing Tradeshow
4. Promote April as Fair Housing Month to increase the public’s awareness of the Fair Housing Act.
5. Utilize the FHEO logo in City documents to raise awareness of Fair Housing.

IMPEDIMENT 5

Local building inspectors lack familiarity with federal multi-family housing requirements.

Lack of familiarity of local building inspection offices with the International Building Code (IBC) and the federally assisted multi-family housing requirements can impact fair housing choice for disabled individuals. IBC and federal requirements mandate a percentage of multi-family units as accessible. Developers have completed apartment projects not in compliance due to an oversight by the building inspector.

ACTION ITEMS

1. Providing training opportunities for City employees whose duties impact fair housing such as building inspection, developing assisted housing or community/economic development activities.

IMPEDIMENT 6

High Denial Rates for Mortgage Loans to Hispanics - The significantly higher denial rates for home mortgages for Hispanics suggests a financial impediment to fair housing choice for Hispanics and all minorities. Denial rates for Hispanics in Ogden are twice as high as denial rates for whites even after adjusting for income. Furthermore, if a Hispanic household receives loan approval that household is nearly two times as likely to have a high interest loan as a white household. Higher denial rates of mortgage loan applications and a disproportionate share of high-cost loans among minority households have the effect of limiting access to mortgage products for these households.

Note: Although Ogden City agrees that there is a significantly higher number of Hispanics denied mortgages and Hispanics disproportionately have higher interest rates in Ogden, the data is inconclusive to determine the reason for the denials and higher interest rates. Ogden City CED contacted a leading local mortgage lender to inquire about the Weber County AI findings and the possible reasons for higher interest rates and higher rate of Hispanics denied mortgages. Poor credit history, no credit history and failure to follow-through with the mortgage application paperwork and process all are important factors which the research provided by U of U for the AI did not take into account.

Although the AI is inconclusive to determine that Hispanics are subject to discrimination based on ethnicity in mortgage lending in Ogden, the City will take the following steps to encourage fair housing choice.


ACTION ITEMS

1. Encourage USU Extension to offer Homebuyer Education class in Spanish in Ogden.
2. Encourage the DLC, Fair Housing to increase Fair Housing testing in Ogden and to include mortgage lending testing based on ethnicity.
3. Review all Own In Ogden homebuyer applications to ensure applicants are not victims of predatory lending.
4. Strengthen partnerships with local lenders and encourage lenders to offer homebuyer education and incentives to purchase homes in the City.

X. Signature for the City of Ogden

By my signature I certify that the *Analysis of Impediments to Fair Housing Choice for the City of Ogden* is in compliance with the intent and directives of the regulations of the Community Development Block Grant Program regulations.





Mayor, Michael P. Caldwell

May 14, 2015

Date

Attest:


Chief Deputy City Recorder

VI. General Data Tables, Maps and Figures

Source: 2012 Weber County Housing Assessment and Plan and Weber County Regional Analysis of Impediments for Fair Housing Equity Assessment

Minority Population Tables

Table 1
Population Estimates by Race and Ethnicity, 2010

	Total Population	White	Minority	Hispanic	African American	Pacific Islander	Asian	Native American	Other
Weber County	231,236	180,638	50,598	38,711	2,748	584	2,784	1,271	4,500
Ogden	82,825	55,557	30,268	24,490	1,553	241	966	701	1,867

Source: U.S. Census Bureau.

Population Estimates by Race and Ethnicity, 2010

	Total Population	White	Minority	Hispanic	African American	Pacific Islander	Asian	Native American	Other
Weber County	231,236	180,638	50,598	38,711	2,748	584	2,784	1,271	4,500
Ogden	82,825	55,557	30,268	24,490	1,553	241	966	701	1,867

Source: U.S. Census Bureau.

Table 2
Percent Share of Population by Race and Ethnicity, 2010

	Total Population	White	Minority	Hispanic	African American	Pacific Islander	Asian	Native American	Other
Weber County	100.0	78.1	21.9	16.7	1.2	0.3	1.2	0.5	1.9
Ogden	100.0	67.1	36.5	30.1	1.9	0.3	1.2	0.8	2.3

Source: U.S. Census Bureau.

Table 3
Number of Disabled Individuals and Selected Households Types, 2010

	Total Population	Disabled Individuals	Large Family Households	Single Parent with Child Under 18 yrs Households.	Households with Persons over 65
Weber County	231,236	23,257	13,647	8,798	16,604
Ogden	82,825	9,723	4,382	4,136	5,814

Source: U.S. Census Bureau.

Table 4
Percent Share of Disabled Individuals and Selected Households, 2010

	Total Population	Disabled Individuals	Large Family Households	Single Parent with Child Under 18 yrs Households.	Households with Persons over 65
Weber County	100.0%	10.1	17.3	11.2	21.1
Ogden	100.0%	11.7	14.8	14.0	19.6

Source: U.S. Census Bureau.

Housing Tables and Maps

Table 3
Ogden: Housing Inventory Profile - 2010

	Units	% Share
Total Units	32,482	100.0%
Occupied	29,631	91.2%
Vacant Units	2,851	8.8%
Owner Occupied	17,093	57.7%
With Mortgage	13,013	76.1%
Without		
Mortgage	4,080	23.9%
Renter Occupied	12,538	42.3%

Source: U.S. Census Bureau, 2010.

Table 4
Renters by Age of Householder - 2010

	Units	% Share
Less than 55 years	9,842	78.5%
55-64 years	1,343	10.7%
65-74 years	691	5.5%
75-84 years	380	3.0%
85+ years	282	2.2%
More than 55 years	2,696	21.5%
Total Renters	12,538	100.0%

Source: U.S. Census Bureau, 2010.

Table 5
Owners by Age of Householder - 2010

	Units	% Share
Less than 55 years	9,970	58.3%
55-64 years	3,158	18.5%
65-74 years	1,858	10.9%
75-84 years	1,431	8.4%
85+ years	676	4.0%
More than 55 years	7,123	41.7%
Total Owners	17,093	100.0%

Source: U.S. Census Bureau, 2010.

Table 6
Ogden: Owner Occupied Units by Race and Ethnicity - 2010

	Units	% Share
Owner-occupied housing units	17,093	100.0%
White alone householder	13,455	78.7%
Black or African American alone householder	213	1.2%
American Indian and Alaska Native alone householder	74	0.4%
Asian alone householder	215	1.3%
Native Hawaiian and Other Pacific Islander alone householder	26	0.2%
Some Other Race alone householder	17	0.1%
Two or More Races householder	168	1.0%
Hispanic or Latino	2,925	17.1%

Source: U.S. Census 2010.

Table 7
Ogden: Renter Occupied Units by Race and Ethnicity - 2010

	Units	% Share
Renter-occupied housing units	12,538	100.0%
White alone householder	8,208	65.5%
Black or African American alone householder	389	3.1%
American Indian and Alaska Native alone householder	173	1.4%
Asian alone householder	137	1.1%
Native Hawaiian and Other Pacific Islander alone householder	31	0.2%
Some Other Race alone householder	22	0.2%
Two or More Races householder	266	2.1%
Hispanic or Latino	3,312	26.4%

Source: U.S. Census 2010.

Table 8
Ogden: Residential Permits Issued by Type

	Single Family	Town homes	Condo	Apartment	Manuf	Total
2000	219	4	46	126	0	395
2001	186	28	11	11	2	238
2002	221	16	31	0	16	284
2003	250	14	8	20	2	294
2004	178	26	35	16	0	255
2005	154	16	14	0	25	209
2006	178	20	43	88	1	330
2007	91	10	13	15	0	129
2008	42	6	100	97	11	256
2009	65	6	17	0	8	96
2010	40	2	10	0	12	64
2011 June	12	0	0	0	2	14
Total	1,636	148	328	373	79	2,564

Source: Bureau of Economic and Business Research, University of Utah.

Figure 1
Ogden: Residential Construction by Type

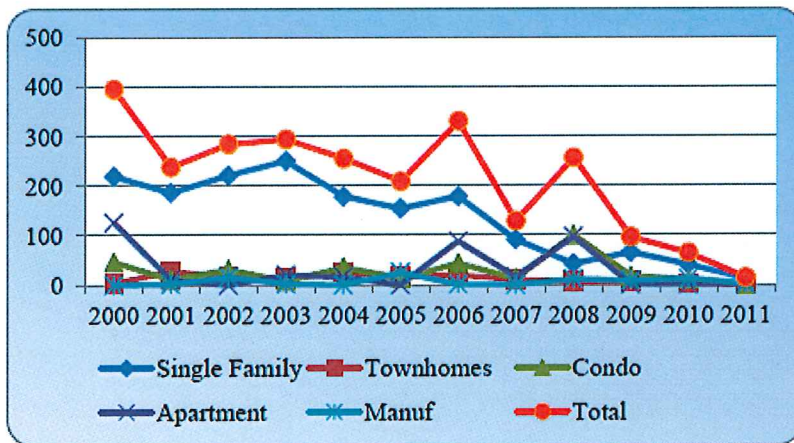


Figure 2
Ogden: Percent Share of Residential Construction 2000-2010

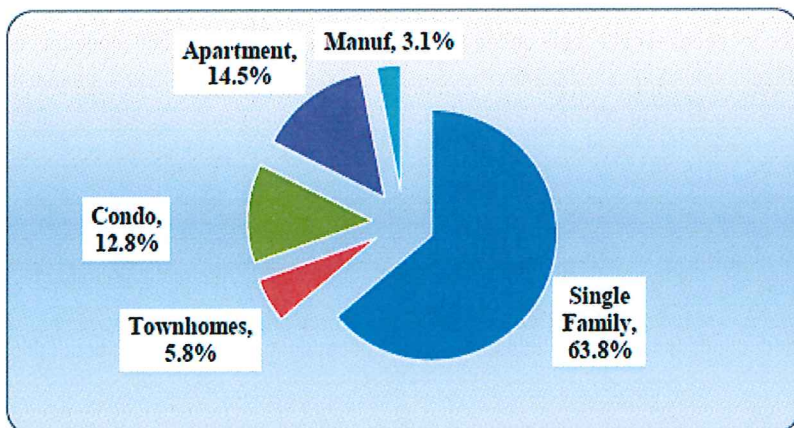


Table 9
Ogden: Price Characteristics of New Homes Sold

	2005	2006	2007	2008	2009	2010
New Homes Sold	82	146	148	61	78	67
Median Price of New Homes	\$151,282	\$160,344	\$164,887	\$158,750	\$161,904	\$167,948
Number Homes Sold < Median	41	73	74	31	39	34
Number Homes Sold <\$200,000	79	124	110	43	61	45
Percent Homes Sold for <\$200,000	96.3%	84.9%	74.3%	70.4%	78.2%	67.1%

Source: New Reach.

Table 10
Ogden: Median Sales Price of Existing Homes and Condos

	Median Sales Price Homes	Median Sales Price Condos
2005	\$106,000	\$84,450
2006	\$114,000	\$92,700
2007	\$124,000	\$109,950
2008	\$128,773	\$114,000
2009	\$125,000	\$110,000
2010	\$116,425	\$108,575
2011	\$100,000	\$84,300

Source: Wasatch Front Regional MLS.

Table 11
**Ogden: Homes Sold That Were Affordable to Low (50% AMI) and
Moderate Income (80% AMI) Households**

	Total Sales	Home <\$120,000*	Home <\$200,000**
2007	1,804	1,002	1,663
2008	1,554	739	1,405
2009	1,040	445	928
2010	828	430	744
2011	833	520	776
Total	6,059	3,136	5,516

**\$120,000 affordable to 50%AMI; **\$200,000
affordable to 80% AMI*

Source: Wasatch Front Regional MLS.

Table 12
**Ogden: Percent of Homes Sold That Were Affordable to Low and
Moderate Income Households**

	% Homes <\$120,000	% Homes <\$200,000
2007	55.5%	92.2%
2008	47.6%	90.4%
2009	42.8%	89.2%
2010	51.9%	89.9%
2011	62.4%	93.2%
Total	51.8%	91.0%

Source: Wasatch Front Regional MLS.

Table 13
Ogden: Condominiums Sold That Were Affordable to Low and Moderate Income Households

	Total Sales	Condo <\$120,000*	Condo <\$200,000**
2007	304	228	296
2008	254	158	249
2009	168	95	163
2010	116	74	111
2011	79	68	76
Total	921	623	895

*\$120,000 affordable to 50%AMI; **\$200,000 affordable to 80% AMI

Source: Wasatch Front Regional MLS.

Table 14
Ogden: Percent of Condominiums Sold That Were Affordable to Low and Moderate Income Households

	% Condo <\$120,000	% Condo <\$200,000
2007	75.0%	97.4%
2008	62.2%	98.0%
2009	56.5%	97.0%
2010	63.8%	95.7%
2011	86.1%	96.2%
Total	67.6%	97.2%

Source: Wasatch Front Regional MLS.

Table 15
Ogden: Short Sales and REO Sales

	Short Sales*	REO Sales**	Combined Short Sales & REO Sales	Total Home Sales	SS & REO Sales as Percent of Total
2008	6	34	40	1,040	3.8%
2009	51	46	97	895	10.8%
2010	80	155	235	828	28.4%
2011	49	130	179	569	31.5%

*Short sales defined as sale in which proceeds from selling the property will fall short of the balance of debt on the property. Lien holders accept less than owed.

**REO is defined as foreclosed real estate owned (REO) by a financial institution.

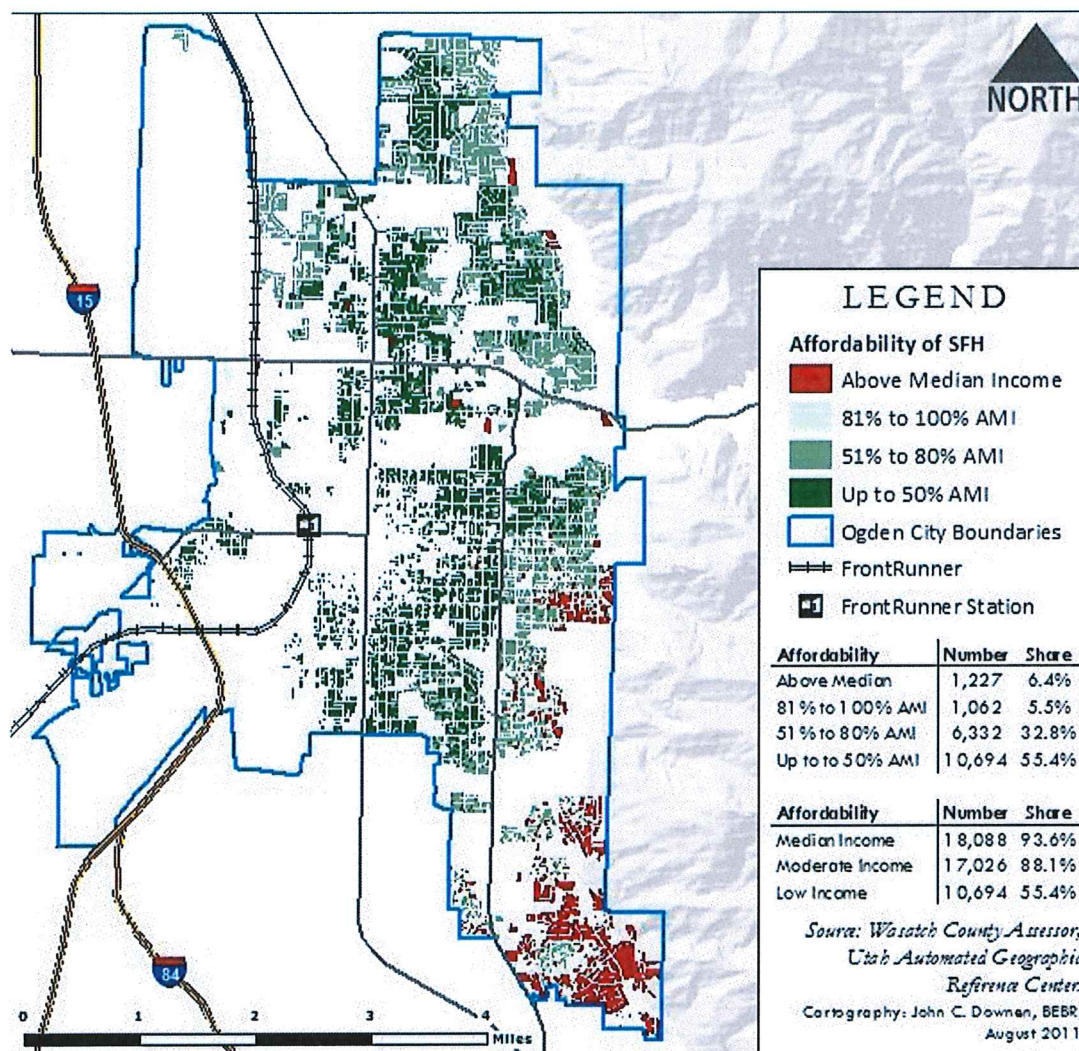
Source: Wasatch Front Regional MLS.

Table 16
Ogden: Median Sales Price of Short Sale and REO Homes

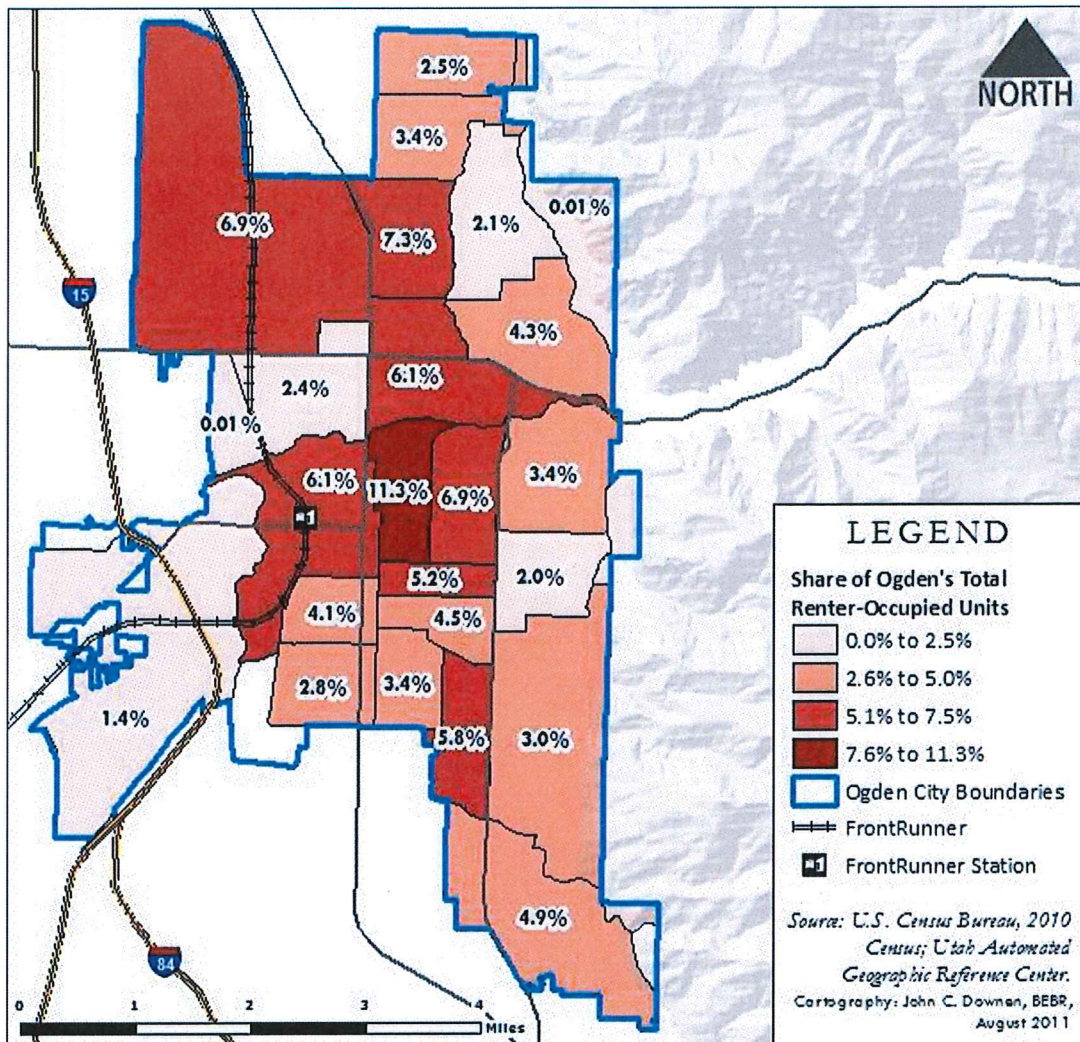
	Short Sales	REO Sales	All Sales
2008	\$99,000	\$70,500	\$99,000
2009	\$120,400	\$71,500	\$120,400
2010	\$108,500	\$72,975	\$108,500
2011	\$105,000	\$59,000	\$105,000

Source: Wasatch Front Regional MLS.

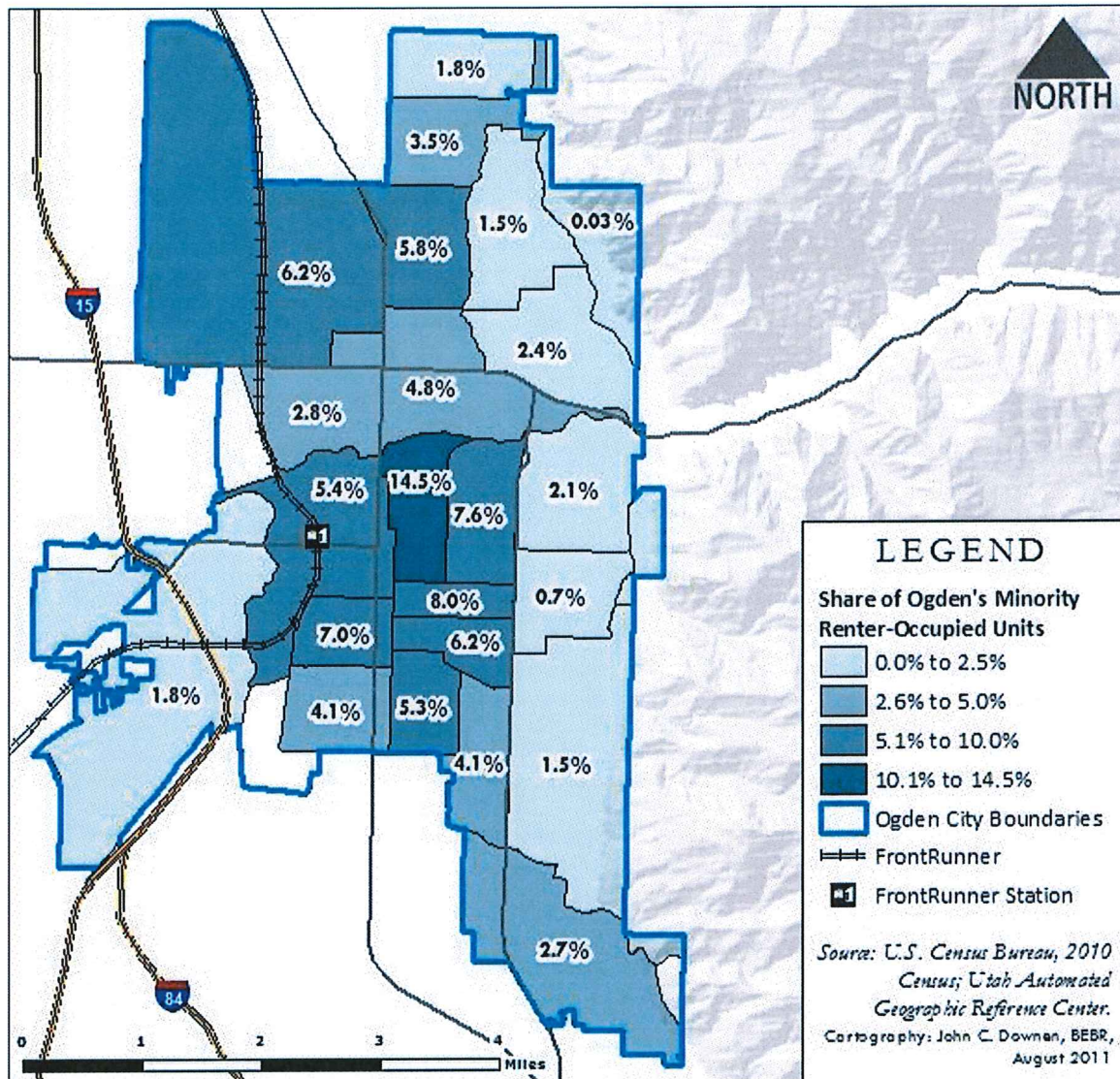
Map 1
Ogden City: Geographic Distribution of Affordable Single-Family Homes



Map 2
Ogden City: Share of City's Rental Units by Census Tract



Map 3
Ogden City: Share of Minority Renter Occupied Units by Census Tract



Comparative Housing Tables

Table 29
Total Housing Units by City

	2000	2010
Weber County	70,454	86,187
Ogden	29,763	32,482
Roy	11,053	12,599
South Ogden	5,459	6,631
Unincorporated	5,004	6,319
North Ogden	4,562	5,799
Washington Terrace	3,162	3,462
West Haven	1,220	3,324
Pleasant View	1,895	2,548
Hooper	1,777	2,156
Plain City	1,001	1,654

Source: U.S. Census Bureau.

Table 30
Cities Ranked by Absolute Change
in Owner Occupied Units

	2000	2010	Absolute Change
Weber County	49,190	57,129	7,939
West Haven	1,045	2,439	1,394
Roy	9,010	9,963	953
North Ogden	3,993	4,917	924
Hooper	1,082	1,962	880
Plain City	895	1,509	614
Pleasant View	1,671	2,232	561
Unincorporated	4,130	4,574	444
Ogden	16,752	17,093	341
South Ogden	3,984	4,277	293
Washington Terrace	2,196	2,262	66

Source: U.S. Census Bureau.

Table 31
Percent Change in Owner Occupied Units

	Percent Change
Weber County	16.1%
West Haven	133.4%
Hooper	81.3%
Plain City	68.6%
Pleasant View	33.6%
North Ogden	23.1%
Unincorporated	10.7%
Roy	10.6%
South Ogden	7.4%
Washington Terrace	3.0%
Ogden	2.0%

Source: U.S. Census Bureau.

Table 32
Cities Ranked by Absolute Change in Renter Occupied Units

	2000	2010	Increase
Weber County	16,508	21,619	5,111
Ogden	10,632	12,538	1,906
South Ogden	1,209	1,927	718
West Haven	86	761	675
Roy	1,679	2,211	532
Washington Terrace	823	1,065	242
North Ogden	423	652	229
Unincorporated	386	543	157
Pleasant View	69	206	137
Hooper	68	120	52
Plain City	84	100	16

Source: U.S. Census Bureau.

Table 33
Cities Ranked by Percent Change in Renter Occupied Units

	Percent Change
Weber County	31.0%
West Haven	784.9%
Pleasant View	198.6%
Hooper	76.5%
South Ogden	59.4%
North Ogden	54.1%
Unincorporated	40.6%
Roy	31.7%
Washington Terrace	29.4%
Plain City	19.0%
Ogden	17.9%

Source: U.S. Census Bureau.

Table 34
Apartments as Share of Additional
Renter Occupied Units

	Increase	New Apts	Apts as % Share
Weber County	5,111	914	17.9%
South Ogden	718	306	42.6%
West Haven	675	429	63.5%
Ogden	1,906	373	19.6%
North Ogden	229	28	12.2%
Roy	532	63	11.8%
Unincorporated	157	18	11.5%
Washington Terrace	242	12	5.0%
Pleasant View	137	0	0.0%
Hooper	52	0	0.0%
Plain City	16	0	0.0%

Source: U.S. Census Bureau.

Table 35
Percent Change from Peak Year in Median Sales Price
Of Single-Family Homes

	Peak Year Price	2011	% Decline
Weber County	\$168,000	\$142,000	-15.5%
Unincorporated	\$655,000	\$258,000	-60.6%
West Haven	\$289,900	\$218,500	-24.6%
Ogden	\$128,773	\$100,000	-22.3%
Hooper	\$269,425	\$216,500	-19.6%
North Ogden	\$222,747	\$184,200	-17.3%
Roy	\$169,000	\$140,000	-17.2%
Pleasant View	\$348,700	\$296,050	-15.1%
Plain City	\$277,500	\$239,900	-13.5%
South Ogden	\$189,950	\$166,500	-12.3%
Washington Terrace	\$139,900	\$124,000	-11.4%

Source: Wasatch Front Regional MLS.

Table 36
Percent Change from Peak Year in
Median Sales Price of Condominiums

	Peak Year Price	2011	Percent Change
Weber County	\$132,900	\$111,000	-16.5%
Unincorporated	\$302,000	\$109,000	-63.9%
Pleasant View	\$246,329	\$155,000	-37.1%
Washington Terrace	\$185,000	\$120,000	-35.1%
West Haven	\$164,529	\$119,000	-27.7%
Ogden	\$114,000	\$87,000	-23.7%
North Ogden	\$150,100	\$117,000	-22.1%
Roy	\$130,000	\$112,000	-13.8%
South Ogden	\$128,950	\$123,500	-4.2%
Hooper			
Plain City	na	na	

Source: Wasatch Front Regional MLS.

Table 37
Percent of Home Sales REO
and Short Sales

	Percent of Sales
Weber County	30.3%
Pleasant View	42.5%
West Haven	40.9%
Ogden	31.5%
Roy	28.1%
Hooper	28.0%
South Ogden	26.0%
North Ogden	24.1%
Washington Terrace	22.0%
Plain City	21.6%
Unincorporated	11.6%

Source: Wasatch Front Regional MLS.

Table 38
Percent of Homes Sales at Less than \$200,000
- 2007-2011

	Number Affordable	% Affordable
Weber County	10,596	72.2
Washington Terrace	429	91.5
Ogden	5,516	91.0
Roy	253	90.6
South Ogden	547	66.5
North Ogden	513	46.3
Plain City	68	21.0
Hooper	93	21.0
West Haven	160	24.4
Unincorporated	4	16.6
Pleasant View	56	14.9

Source: Wasatch Front Regional MLS.

Table 39
Percent of Condominium Sales at Less than
\$200,000 -2007-2011

	Number Affordable	% Affordable
Weber County	2,399	91.0
North Ogden	297	99.7
Ogden	921	97.0
Roy	219	100.0
West Haven	178	96.7
South Ogden	283	90.1
Washington Terrace	88	76.1
Unincorporated	56	50.0
Pleasant View	76	40.8
Hooper	0	0
Plain City	0	0

Source: Wasatch Front Regional MLS.

Table 40
Tax Credit Projects in Weber County

Project	Address	City	Units	Yr. Built or Rehab	Type
Mount Eyrie	1225 North 454 East	Ogden	38	1992	Rehab
Marion Hotel	184 25th Street	Ogden	86	1992	Rehab
McGregor Apartments	810 East 25th Street	Ogden	55	1992	Rehab
Village Square	545 Jefferson Avenue	Ogden	80	1992	New
Lorin Farr Crown Homes	Scattered Sites	Ogden	13	1993	New
Royal Hotel	2522 Wall Avenue	Ogden	20	1993	Rehab
Elmhurst Apartments	2432 Van Buren	Ogden	15	1994	Rehab
Ogden Crown 94	Scattered Sites	Ogden	6	1994	New
Ridgeview Apartments	710 North Washington	Ogden	79	1994	New
Mountain Glen Apartments	5725 South Wasatch Dr	South Ogden	80	1994	New
Ogden Crown 97	Scattered Sites	Ogden	6	1997	New
Washington Park Apts	170 N. Washington Blvd	Ogden	112	1997	New
Fairview Apartments	579 East 27th Street	Ogden	32	2001	Rehab
Country Woods Apts	525 Park Boulevard	Ogden	168	2002	Rehab
Hoover Apartments	330 27th Street	Ogden	23	2002	Rehab
Haven Pointe	2265 South 1100 West	West Haven	192	2002	New
Kingstowne Apartments	2245 Monroe Blvd	Ogden	48	2003	Rehab
Villa South Apartments	3757 South Grant Ave	South Ogden	120	2003	Rehab
St. Benedict's Manor I	3000 Polk Avenue	Ogden	100	2005	Rehab
Tamlyn Apartments	1121 Sullivan Road	Ogden	35	2005	Rehab
Valencia Apartments	461 27th Street	Ogden	122	2005	Rehab
Victoria Ridge	291 10 th Street	Ogden	48	2005	New
St. Benedict's Manor II	1469 Darling Street	Ogden	40	2006	Rehab
Liberty Junction	2353 Junction Way	Ogden	93	2007	New
Kara Manor Apartments	4960 South 425 West	Wash Terrace	44	2007	Rehab
Bramblewood Apartments	173 East Dan Street	Ogden	68	2008	Rehab
Countryside Court	650 N. Washington Blvd.	Ogden	72	2008	Rehab
Madison Manor	2430 Madison	Ogden	30	2010	Rehab
Total			1,825		
Built Since 2000			333		
Rehab			1,116		
New			709		

Source: Utah Housing Corporation.

Table 41
HUD Subsidized Apartments in Weber County

Project	Address	City	Units	Type
Apple Grove	1333 Grant Avenue	Ogden	28	Family
Bramwell Court	2625 Gramercy Avenue	Ogden	18	811
Fellowship Manor	2334 Monroe Blvd	Ogden	131	Senior
Galloway	2522,2525,2536 D Avenue	Ogden	12	Family
Garden Grove	1155 23rd Street	Ogden	20	Senior
Golden Link Manor	1132 24th Street	Ogden	31	Senior
Graham Court	32nd & Lincoln Ave	Ogden	15	811
Kimi Lane	663 22 nd Street	Ogden	24	Senior
Lomond Garden	550 Grant Avenue	Ogden	76	Senior
Lincoln	610 Lincoln Avenue	Ogden	32	Family
Massey Manor	2515 F Ave	Ogden	13	Families
Normandie I	610 1st Street	Ogden	36	Families
Normandie II	610 1st Street	Ogden	16	Families
Ogden Senior Villa	225 29th Street	Ogden	32	Senior
Osmond Heights	630 East 23rd Street	Ogden	40	Families
RL Courts	849 East 550 South	Ogden	50	Senior
Sierra	235 & 251 28 th Street & 2865 Childs Avenue	Ogden	28	Family
Three Links Towers	2427 Jefferson Ave	Ogden	122	Senior
Union Gardens	468 3rd Street	Ogden	50	Senior
LaDawn	1775 West 4800 South	Roy	64	Families
Heritage House	300 East 5000 South	Washington Terrace	34	Senior
Total			872	
Senior			570	
Families			269	
Disabled			33	

Source: HUD.

Table 42
Deficit or Gap of Affordable Housing by Participating Cities

	Extremely Low Income	Very Low Income	Low Income
Roy city	566	865	1,282
Plain City	88	163	249
Hooper	98	186	294
Washington Terrace	141	-27	65
West Haven	117	174	174
North Ogden	329	478	782
Ogden	177	-2,313	-1,861
South Ogden	320	317	479
Pleasant View	141	181	255
Unincorporated	145	265	344
Total	2,123	288	2,031

Source: HUD Sustainable Communities data.

Poverty data, Tables and Maps

Table 3
Number and Share of Poor Persons in Weber County by City, 2010

	Poor White	Poor Minority	Total Poor	Minority Share of Poor	Total Population	% Poor
Weber County	13,487	10,281	23,768	43.3%	209,730	11.3%
Farr West	165	2	167	1.2%	4,994	3.3%
Harrisville	125	15	140	10.7%	5,441	2.6%
Hooper	144	54	198	27.3%	5,118	3.9%
Marriott-Slaterville	57	12	69	17.4%	1,816	3.8%
North Ogden	519	89	608	14.6%	16,842	3.6%
Ogden	8,408	8,345	16,753	49.8%	80,349	20.9%
Plain City	159	31	190	16.3%	4,824	3.9%
Pleasant View	244	98	342	28.7%	6,627	5.2%
Riverdale	383	36	419	8.6%	7,936	5.3%
Roy	1,155	541	1,696	31.9%	34,441	4.9%
South Ogden	786	273	1,059	25.8%	15,203	7.0%
Washington Terrace	474	304	778	39.1%	7,988	9.7%
West Haven	285	391	676	57.8%	7,195	9.4%

Source: HUD Spreadsheet for Sustainable Communities Grantees

Though the total percentage of poor people in Weber County was just over 11 percent, and about 43 percent of them were minorities, the poor populations varied greatly by city *Table 3*. By far the highest number of poor residents lived in Ogden, which is the largest city in the county. Almost 21 percent of all residents in Ogden were poor; a total of 16,750 individuals. In comparison, the next two highest concentrations by city were in Washington Terrace and West Haven with 9.7 percent and 9.4 percent, respectively. Ogden's poor population is nearly 50 percent minority. Only West Haven's poor population has a higher share or greater concentration of minorities. In West Haven 58 percent of the poor population is minority.

Figure 1 - Poor Individuals by Census Tract Weber County, 2010

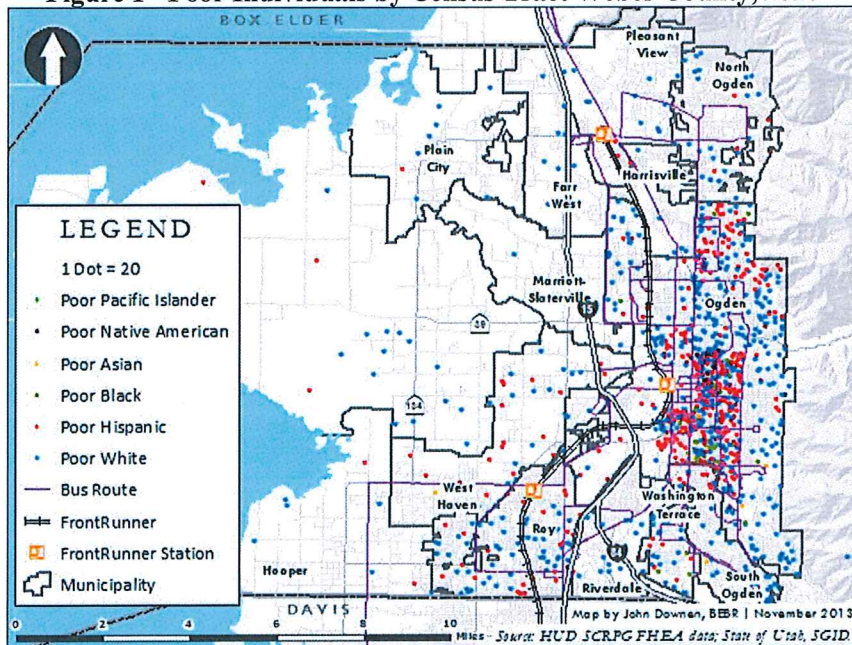
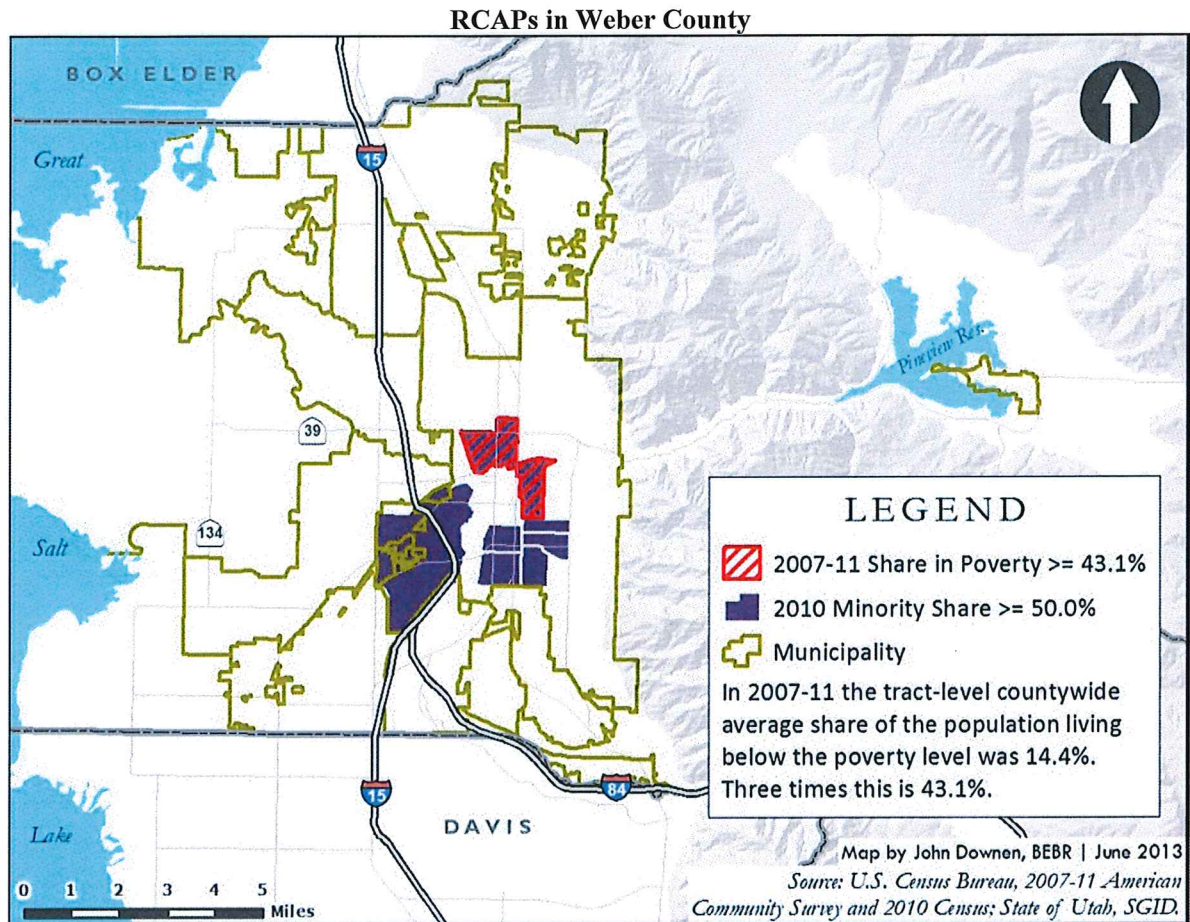


Figure 1 maps the geographical location of poor residents living in Weber County by race and ethnicity in 2010. There are much larger concentrations of poor individuals living in the central cities, particularly the south part of Ogden. In fact, the majority of both non-Hispanic whites and minority residents living below the poverty line are located in Ogden. There are also some lighter concentrations in north Ogden, near Harrisville. While the poor non-white Hispanic population of

Figure 2



In order to determine an ethnically concentrated area of poverty (ECAP) the poor Hispanic tracts were mapped *Figure 3*. This figure overlays the concentrations of poverty with tracts that have a Hispanic population of 10 percentage points or more above the 16.1 percent Hispanic share of county's population. All tracts with large Hispanic shares are located within Ogden with the exception of a small area in South Ogden. Large Hispanic populations are present in three tracts where the share of the population in poverty is greater than three-times the county average, or 43.1 percent. These tracts meet the definition of an ECAP. There are several tracts where the Hispanic share is 10 percent above the county average but these tracts do not satisfy the poverty condition.

Figure 3
Concentrations of Poverty and Hispanics by Tract in Weber County, 2007–2011

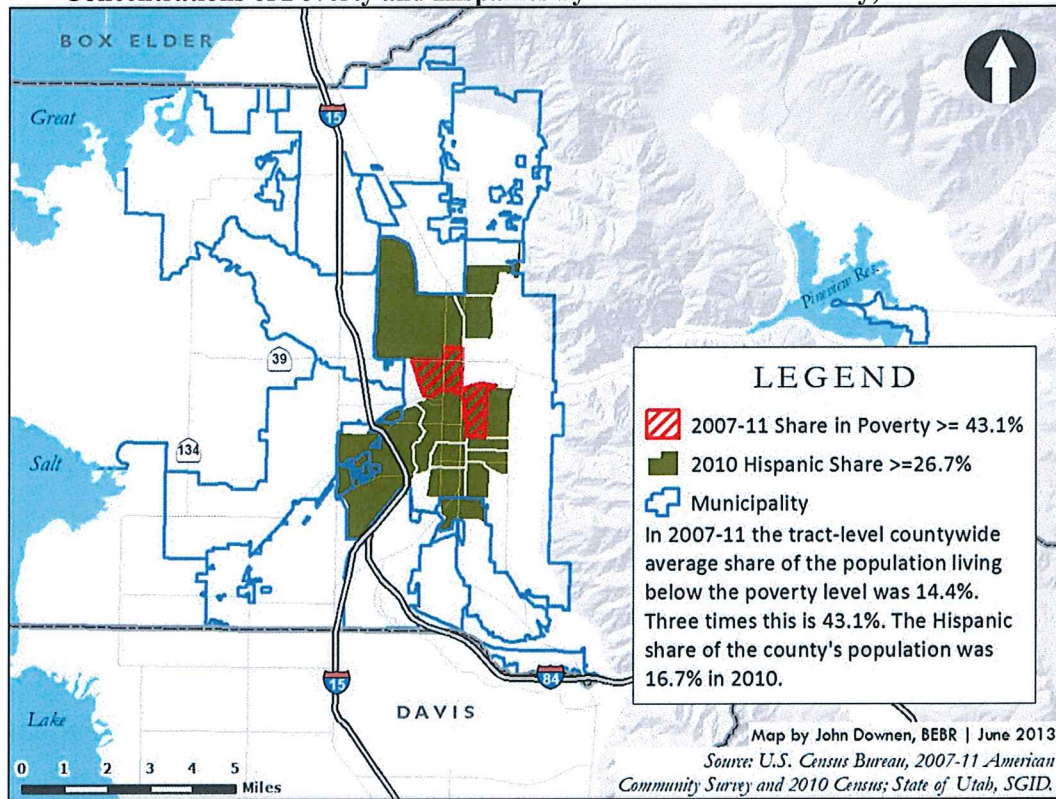


Table 4
RCAP and ECAP Census Tracts
Percent of Renter-Occupied Units

Census Tract	Occupied Units	Renter-Occupied	% Renter-Occupied
500 West to Washington Blvd, 900 South to 20 th Street			
2004	607	304	50.1%
Washington Blvd to Harrison Blvd, Park Blvd to 26 th Street			
2008	1,682	867	51.5%
2009	1,712	1,422	83.1%
Pacific Ave to Adams Ave, 27 th Street to 36 th Street			
2012	743	520	70.0%
2018	697	355	50.9%
Adams Ave to Harrison Blvd, 26 th Street to 32 nd Street			
2013.01	1,038	653	62.9%
2013.02	1,148	559	48.7%
1900 West to 1250 West, 24 th Street to 4400 South			
2019	408	193	47.3%

Source: U.S. Census Bureau.

Rent Assisted Maps and Tables

Figure 4

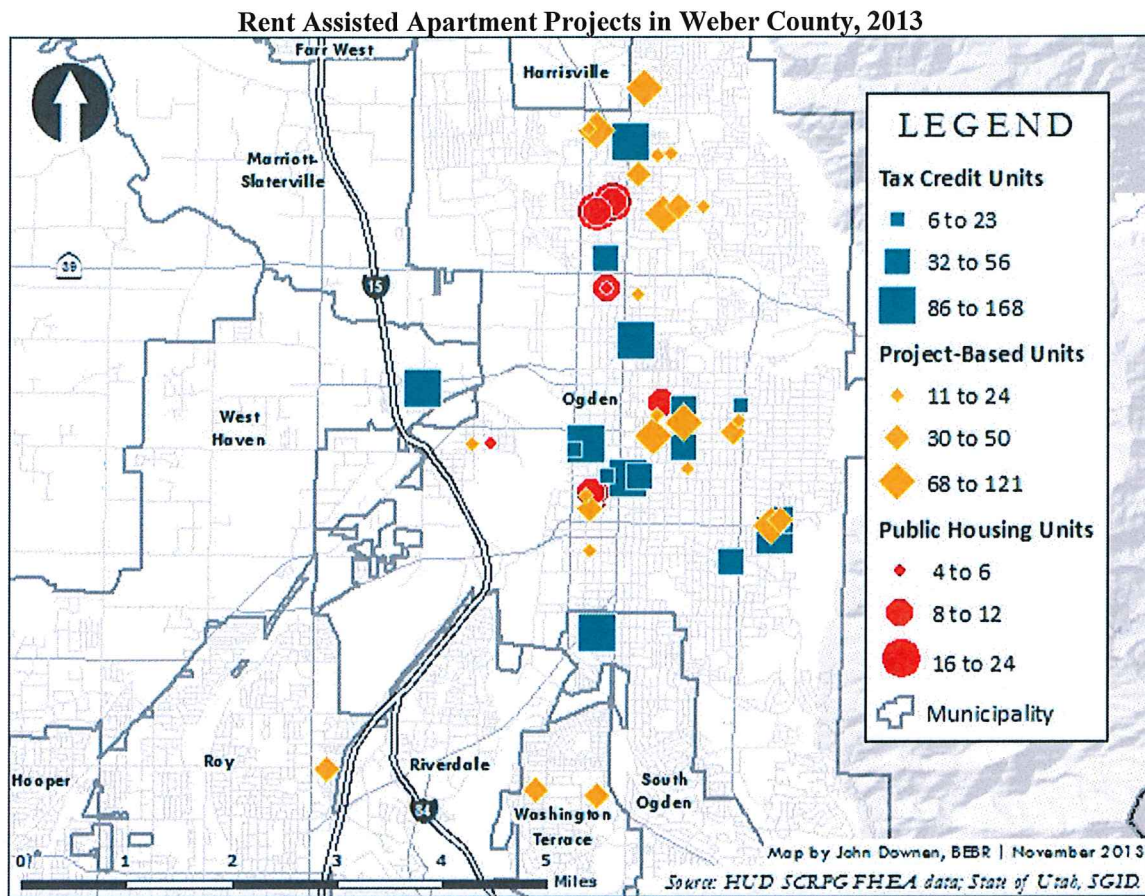


Figure 5 overlays the Section 8 voucher locations with the minority share of the population by census tract. Census tracts with higher percentages of minority residents also tend to have higher numbers of section 8 vouchers. This could indicate a high use of Section 8 vouchers within the minority communities, or simply a correlation between low-income and minority households living in neighborhoods with relatively low rents and landlords that accept Section 8 vouchers.

Figure 6 overlays the location of Section 8 vouchers in the county on tracts representing the number of low-wage jobs available in 2010. A large majority of the vouchers holders are in tracts in the older neighborhoods of Ogden, just to the east of the downtown commercial area and the location of a large number of low-wage jobs. However, the prevalence of Section 8 vouchers in more residential neighborhoods reflects the availability of affordable rental housing and likely suggest a need for public transportation from these residential areas to the commercial areas. As shown in Figure 6 the bus routes are limited thus the connection of affordable housing, with access to transportation and employment is weak and likely presents an impediment to fair housing choice for low-income protected classes.

Figure 5 - Section 8 Vouchers and Minority Population Share in Weber County

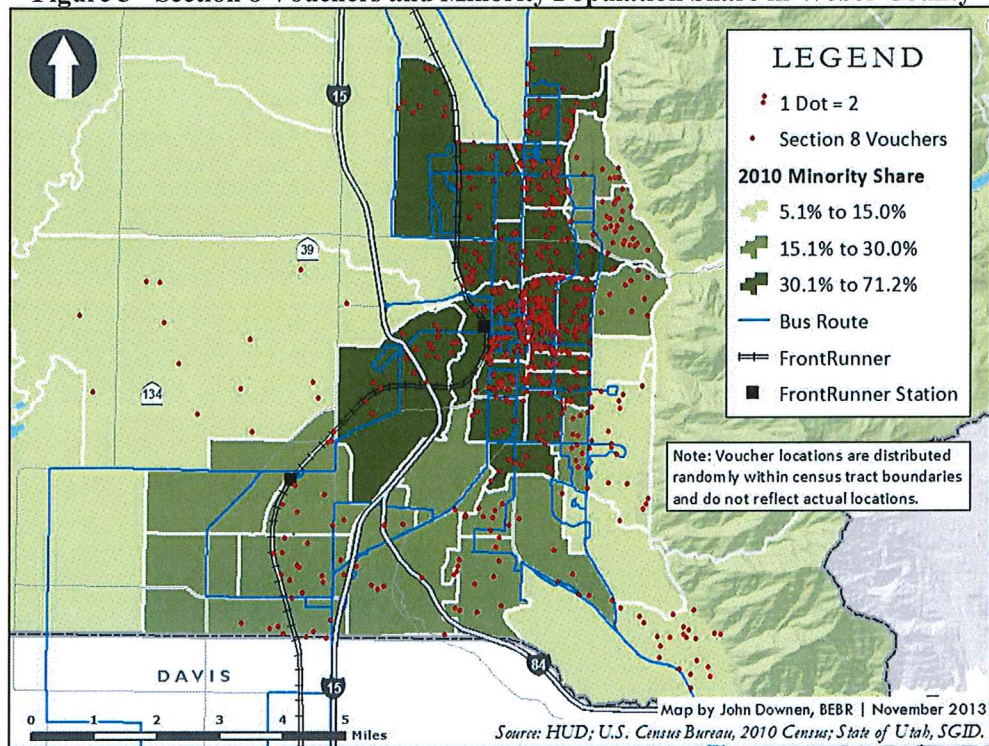
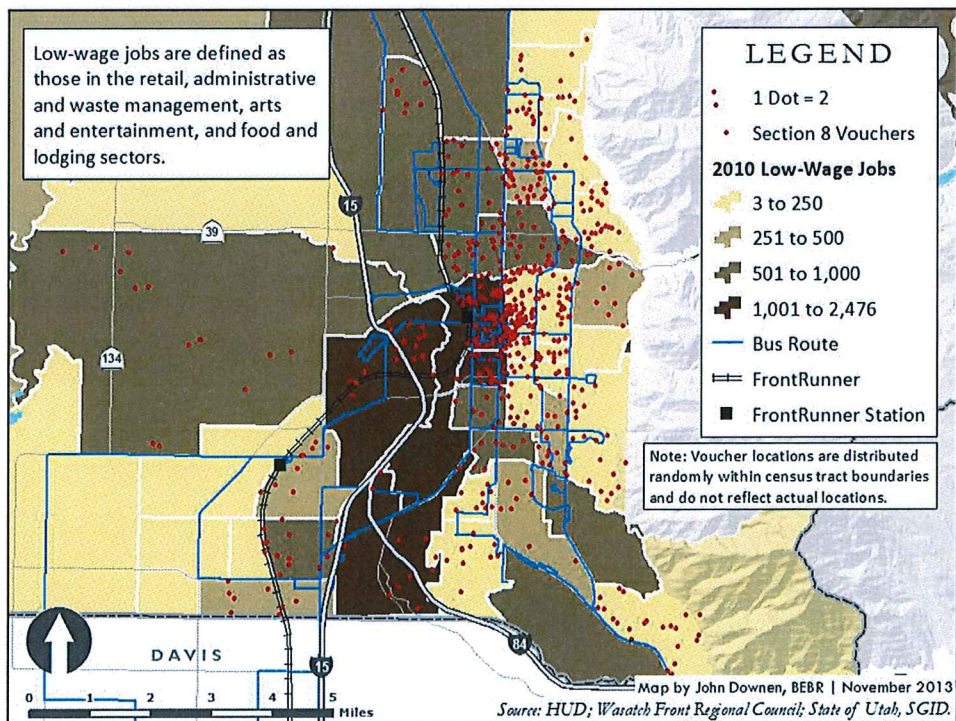


Figure 6 - Section 8 Voucher Holders and Low-Wage Jobs in Weber County



Fair Housing Complaints Tables

Table 23
Utah Legal Center Cased Calls: Characteristics of Callers with
Housing Complaints in Weber County

	FY2013	% Share 2013
Total Cased	228	100.0%
Disabled	108	47.7%
Race		
Asian/Pacific Islander	1	0.4%
Black	13	5.7%
Hispanic	29	12.7%
Native American	3	1.3%
White	171	75.0%
Other/Unknown	11	4.8%
Age		
0-12	0	0.0%
13-17	0	0.0%
18-24	25	11.0%
25-59	158	69.3%
60+	45	19.7%
Unknown	0	0.0%
Sex		
Female	161	70.6%
Male	67	29.4%
Unknown	0	0.0%
Marital Status		
Single	106	46.5%
Married	35	15.4%
Separated	14	6.1%
Widowed	8	3.5%
Unknown	65	28.5%

Source: Utah Legal Center

Table 24
Utah Legal Center Total Calls: Characteristics of Callers with
Housing Complaints in Weber County

	FY2013	% Share 2013
Total Calls	449	100.0%
Age 60+	61	13.6%
Race		
Asian/Pacific Islander	4	0.9%
Black	17	3.8%
Hispanic	68	15.1%
Native American	6	1.3%
White	339	75.5%
Other/Unknown	15	3.3%
Over 125% Poverty OR Over in Assets	75	16.7%
Veteran=Yes	33	7.3%

Source: Utah Legal Center

Table 25
Housing Complaint Assistance by Disability Law Center, FY 2013
(Weber County)

Type	Calls
Level of Service:	
Information and Referral	25
Short Term Assistance	23
Representation at Meeting (s)	2
Total	50
Ethnicity:	
Hispanic/Latino	6
White (Hispanic/Latino)	1
White (Not Hispanic/Latino Origin)	42
Unknown	1
Gender:	
Female	33
Male	16
Unknown	1
Age:	
11-20	3
21-30	10
31-40	9
41-50	9
51-60	15
61-70	5

Source: Disability Law Center

Note: Definition of Terms by DLC

Information and referral: a client was given basic information and a referral

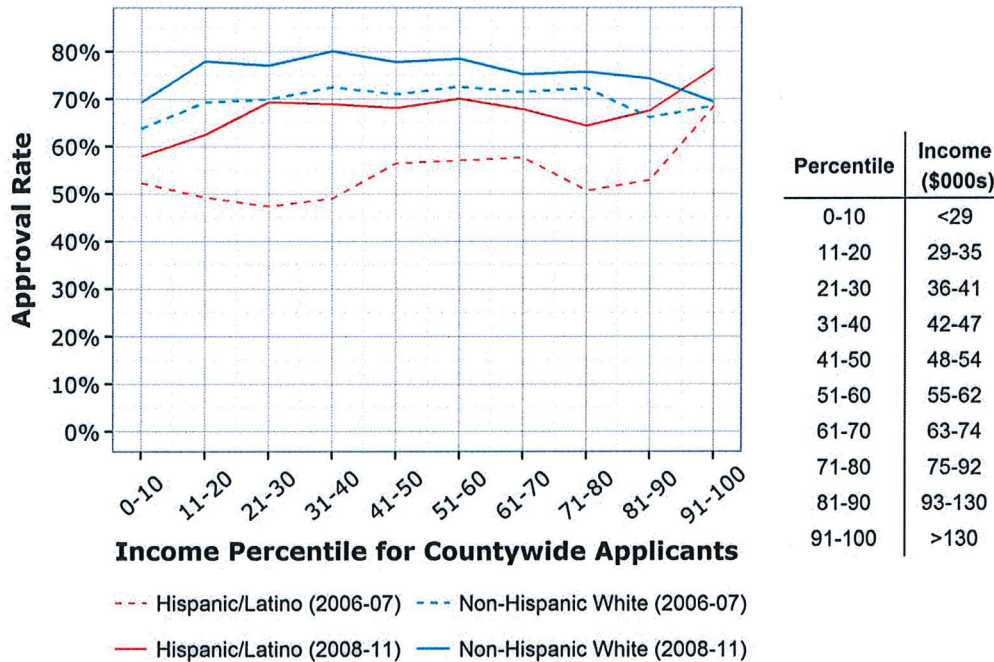
Short Term Assistance: a client was given at least one additional piece of information beyond a referral

Representation at meeting(s): the DLC attended meetings and/or made calls with or on behalf of the client.

Representation at hearings: the DLC attended a hearing, in these cases a Utah Antidiscrimination and labor commission administrative hearing with and/or on behalf of the client

Mortgage Lending Analysis

Taken from Weber county Analsys Pages 38 – 47

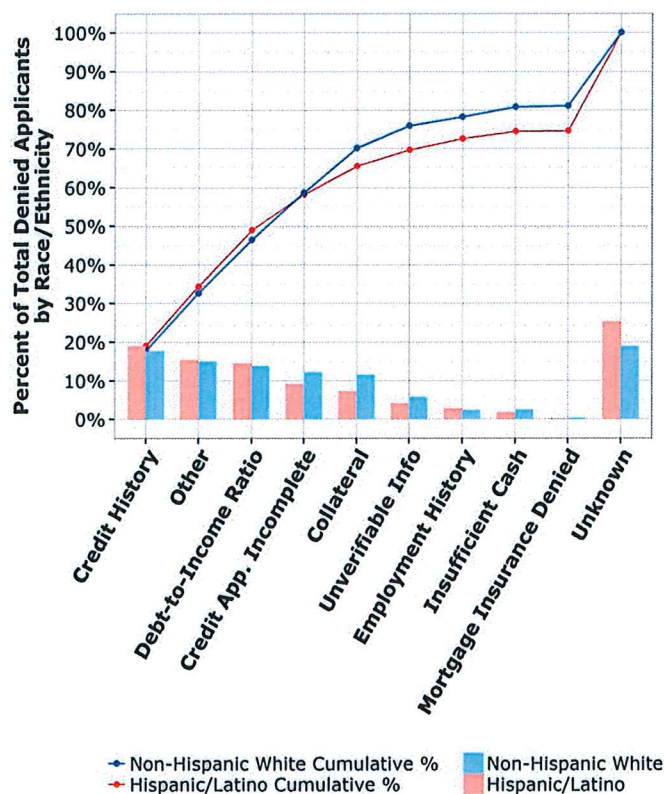


Given the small application volume for several cities in Weber County, the reported income was only disaggregated to two income brackets, using 80 percent HAMFI as the threshold. *Figure 4*, on the other hand, shows the overall county-level approval rates for both groups disaggregated by more income brackets to determine if the gap persists consistently at all income levels. The percentiles shown on the horizontal axis represent nominal dollars that are constant across both groups. The income levels are based on the income deciles of the total Weber County applicants in the HMDA data from 2006 to 2011, which are shown in *Figure 4*.

Despite the persistent disparity in mortgage outcomes between the two groups, other factors such as credit history could be the driving force behind the mortgage denials. *Figure 5* shows the composition of denial reasons by race/ethnicity for all denied non-Hispanic white and Hispanic/ Latino applicants from 2006 to 2011. While as many as three denial reasons may be reported, *Figure 5* shows only the primary reason for the sake of simplicity. The bar graph component of *Figure 5* shows the proportion of denied applications by race/ethnicity attributed to each denial reason. Note that 19 percent and 25 percent of the denials for white and Hispanic/ Latino applicants, respectively, did not have a documented reason for denials. In fact, the reporting of denial reasons is not mandatory except for institutions under the supervision of the Office of the Comptroller of the Currency or the Office of Thrift Supervision¹.

The line graph component of *Figure 5* represents the cumulative percentages for the denial reasons listed from left to right. Roughly 30 percent and 28 percent of the denials among non-Hispanic white and Hispanic/Latino applicants, respectively, are due to poor credit history or incomplete credit applications. However, given the large share of denied applications with no documented reasons and the lack of detailed

credit history information, the HMDA data cannot conclusively reveal the reasons behind the denied mortgage applications.



The slightly disproportionately large share of Hispanic denials among those at the lowest income deciles shown *Figure 6* Page ____ and more charts and tables) does not contradict the pervasive approval rate gaps across income deciles as shown in *Figure 4*. The former depicts the income brackets where Hispanic applicants bear the greatest burden of mortgage denials within the *entire* Hispanic applicant pool, while the latter considers the percentage of mortgage approvals within *each* income decile. Thus, income could be one minor driving force in the disproportionality of mortgage denials among the lowest-income Hispanic applicants but does not explain the pervasive approval rate gaps across nearly all income deciles.

The four quadrants of *Figure 6* are divided horizontally by race/ethnicity and vertically by the approved and denied subset (dotted lines), which are overlaid by the cumulative application distribution (solid lines). For both non-Hispanic white and Hispanic/Latino applications, the distributions have skewed more to the lower income levels after the housing boom as evidenced by the increasing concavity from the solid red lines (2006 to 2007 applications) to solid blue lines (2008 to 2011 applications). Note the cumulative distributions of approvals and total applications for non-Hispanic whites and Hispanics are nearly identical for both housing periods. This means that non-Hispanic white and Hispanic applicants at the lowest income levels have not received a disproportionately lower share of the total approved applications within their own demographic group.

On the other hand, the cumulative denial distributions do not align completely with those of the total applications for both groups. In the bottom-left quadrant of *Figure 6*, the cumulative denied distribution for Hispanics during the housing bust (dotted blue line) deviates from its cumulative total distribution (dotted blue line) across the lowest income deciles. In fact, nearly 56 of the Hispanic denials in Weber County during the housing bust reported incomes below the 20th countywide income percentile (\$35,000/year), while only 45 percent of Hispanic applicants were in the two lowest income deciles. This reflects a growing disproportionality of denials among low-income Hispanic applicants, since the deviation of the cumulative distribution of denials during the housing boom (dotted red line in the bottom-left quadrant of *Figure 6*) is only slightly more concave than the corresponding cumulative distribution of total Hispanic applicants (solid red line).

For non-Hispanic whites, the cumulative denied distribution during the housing bust (dotted blue line in the bottom-right quadrant of *Figure 6*) is concave below the countywide median and slightly convex above the median. This means that non-Hispanic white applicants during this period with reported incomes at the lowest and highest income deciles received a disproportionately higher number of denials than expected. Interestingly, this same pattern is apparent for non-Hispanic white applicants during the housing boom (dotted red line in the bottom-right quadrant of *Figure 6*). However, this disproportionality within the non-Hispanic white applicant pool is more attenuated than within the Hispanic applicant pool.

The slightly disproportionately large share of Hispanic denials among those at the lowest income deciles shown *Figure 6* does not contradict the pervasive approval rate gaps across income deciles as shown in *Figure 4*. The former depicts the income brackets where Hispanic applicants bear the greatest burden of mortgage denials within the *entire* Hispanic applicant pool, while the latter considers the percentage of mortgage approvals within *each* income decile. Thus, income could be one minor driving force in the disproportionality of mortgage denials among the lowest-income Hispanic applicants but does not explain the pervasive approval rate gaps across nearly all income deciles.

Figure 6
Cumulative Distribution of Applications, Approvals, and Denials
by Income and Race/Ethnicity in Weber County, 2006–2011

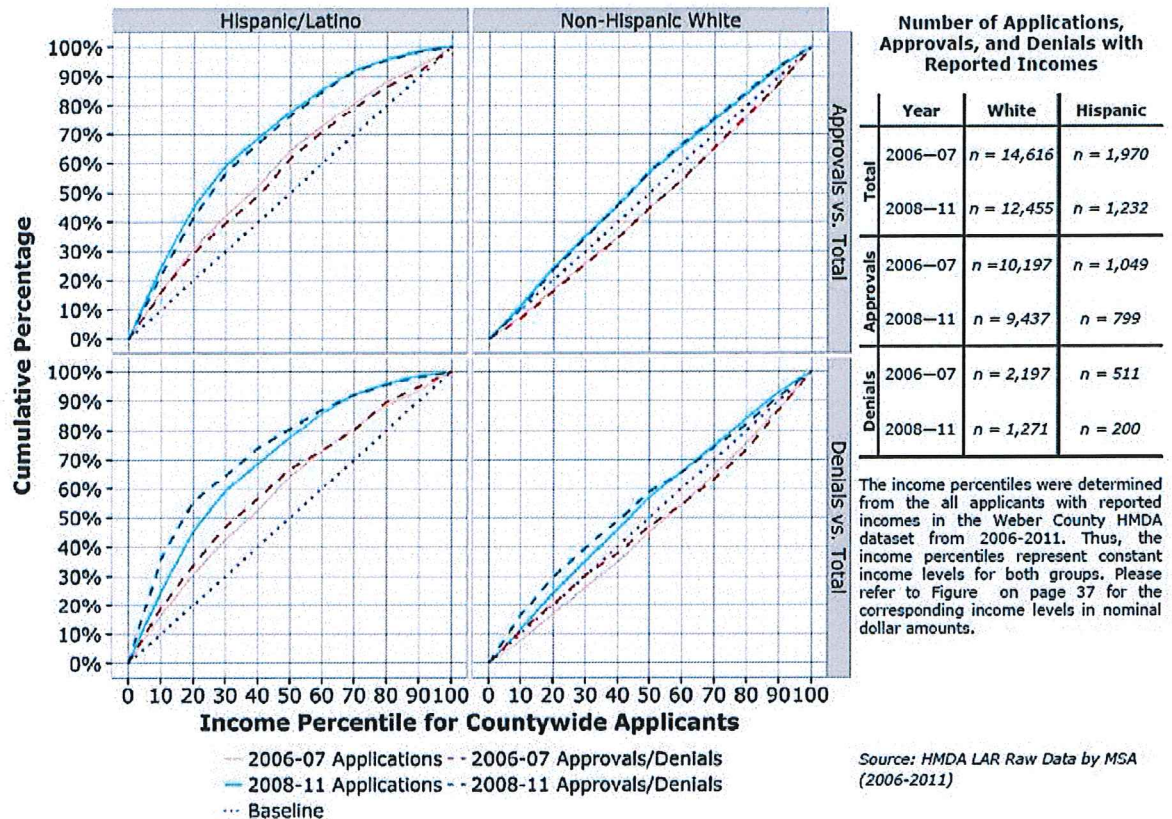


Table 1
Indices of Dissimilarity for Denials & Approvals by
Race/Ethnicity in Weber County, 2006–2011

	Denials		Approvals	
	Boom	Bust	Boom	Bust
Non-Hispanic White	0.06	0.07	0.02	0.02
Hispanic/Latino	0.06	0.12	0.04	0.03

Source: HMDA LAR Raw Data by MSA (2006-2011)

The index of dissimilarity *Table 1* measures the extent to which the income distributions of approved and denied applicants differed from the income distribution of total applicants. The indices are interpreted as the proportion of applicants that must move to another income decile in order to

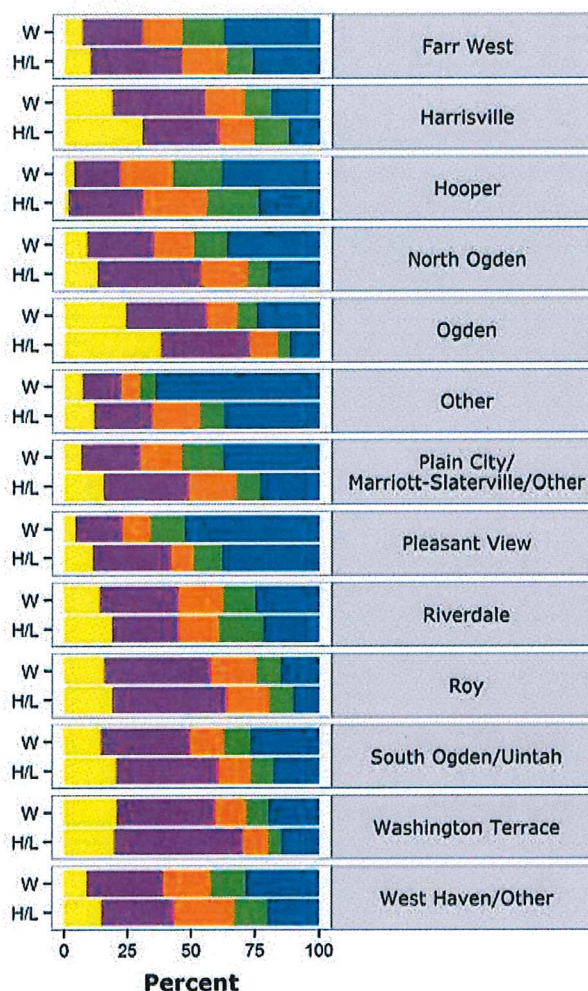
make the overall distribution and the approval/denial distributions identical. The Index of Dissimilarity section has a detailed explanation of this metric.

For both groups, the indices of dissimilarity for approvals have remains at levels between 0.02 and 0.04 during the housing bust period. This means that 2 to 4 percent of non-Hispanic white and Hispanic applicants would have to move to other income brackets in order for the approval distributions of each group to resemble that of their respective applicant pools. Thus, neither the indices nor the graphical representations of application outcomes by income distributions suggest that the low approval rates among Hispanic applicants are due to the income disparities across racial and ethnic groups alone, since approvals are generally issued proportionately across both groups. The increasing indices of dissimilarity for denials among both groups reflect the growing disproportionality of denials within the lowest income deciles for both groups.

Figure 7 shows the applicant income distribution by race and ethnicity for each city in Weber County. The income categories are based on the reported incomes as a percentage of the MSA median family income (MFI). Each reported income has been adjusted as a percentage of the median family income for the year that the mortgage application was submitted.

While the income distributions within cities are skewed more toward higher income brackets for non-Hispanic white applicants than for their Hispanic counterparts, the disparities across cities are often even larger. For instance, 52 percent and 38 percent of non-Hispanic white and Hispanic applicants, respectively, who selected Pleasant View homes reported incomes greater than 120 percent MFI. On the other hand, in cities such

Figure 7
Applicant Income Distribution by Race/Ethnicity
in Weber County Cities, 2006–2011



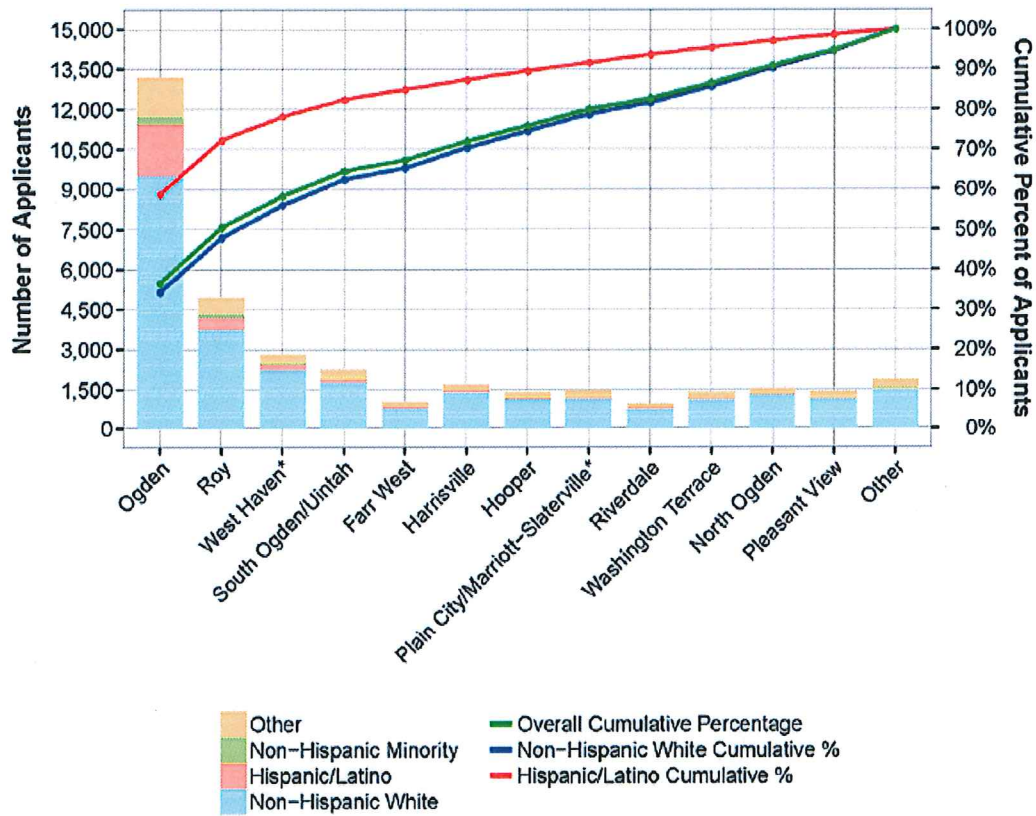
Source: HMDA LAR Raw Data (2006–2011)

as Roy and Washington Terrace, which have the median assessed values of single-family homes below \$150,000, have less than a fifth of applicants reporting incomes above 120 percent MFI for both groups. In fact, over three-quarters of the applicants selecting properties in Roy reported incomes below the median family income. Despite the skewedness at the lowest and highest income brackets, half of the applicants in both groups selecting Ogden reported incomes between 50 percent and 120 percent MFI.

Thus, lower-income applicants, regardless of race, have a tendency to apply for properties in the central and southern regions of the county, whereas more affluent applicants tend to select Pleasant View, which has one of the highest median assessed values of single-family homes in the county. While Figure 7 shows that the differences in income distributions are often larger across cities than between the two groups within each city, it does not show the self-selection effect via application volume.

Figure 8 shows the application composition for non-Hispanic white, Hispanic/Latino, and non-Hispanic minority applicants. The stacked bar graph also includes “Other” as a category, which encompasses all applications with co-applicants whose race/ethnicity is different from that of the

Figure 8
Application Composition by Race/Ethnicity and Cities in
Weber County, 2006–2011



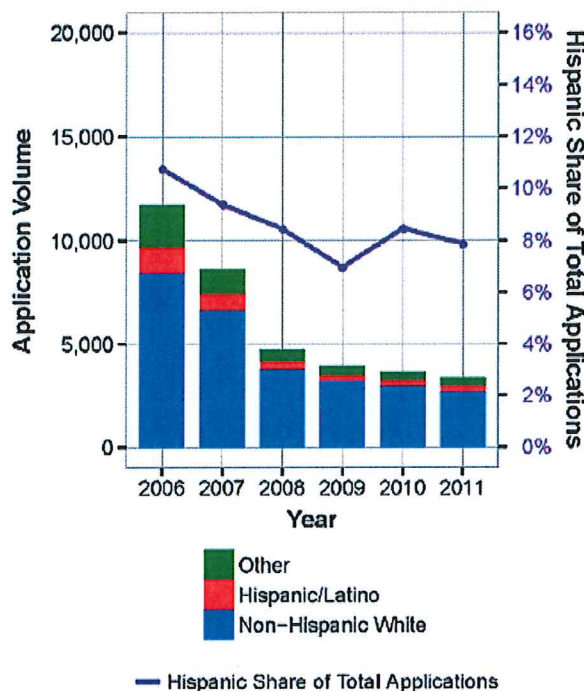
Source: HMDA LAR Raw Data by MSA (2006–2011)

Note: The categories Plain City/Marriott-Slaterville and West Haven include unincorporated areas in the western region of Weber County, which are contained within the census tracts that encompass the three cities.

applicant as well as any application with unspecified race/ethnicity from either the applicant or co-applicant. The bar graph component is ordered from left to right, starting with the city with the highest proportion of Hispanic/Latino applicants to the city with the lowest proportion.

The line graphs in Figure 8 show the cumulative percentages for the total and the respective race/ethnic groups. The cumulative percentages aggregate the proportion of applicants, starting from the left with Ogden to the city that corresponds to a given point on the line graphs. The green line in Figure 8 shows that 58 percent of all Weber County applications were for homes in Ogden, Roy, and West Haven. For Hispanic/Latino applicants, this cumulative percentage is over 78 percent. Given the concentration of Hispanic/Latino applications in these three cities, the red cumulative percentage line in Figure 8 is much more elevated than the total and non-Hispanic white cumulative percentage lines. In fact, more than seven out of every ten Hispanic applicants who applied for Weber County properties selected Ogden or Roy compared to only 48 percent of their non-Hispanic white counterparts. Thus, Figure 8 confirms that the

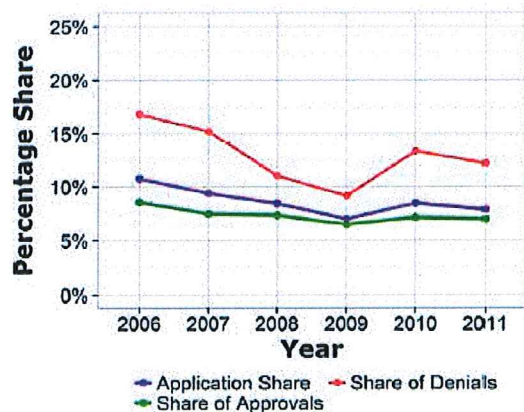
Figure 9
Application Volume by Race/Ethnicity in Weber County, 2006–2011



Source: HMDA LAR Raw Data by MSA (2006–2011)

Hispanic self-selection effect in Weber County is overwhelmingly concentrated in Ogden and Roy,

Figure 10
Hispanic Share of Mortgage Applications, Approvals, and Denials in Weber County, 2006–2011



Source: HMDA LAR Raw Data by MSA (2006–2011)

which have the largest Hispanic share of the total population in the county at 30 percent and 13.5 percent, respectively.

While the self-selection effect in the mortgage application process signals the intensification of the Hispanic population in Ogden and Roy, the HMDA data also reveals an even larger symptom of homeownership impediments. Figure 9 shows the drastic declining mortgage application volume from 2006 to 2011. The application volume in fact declined by nearly 72 percent from 2006 to 2011. The purple line in Figure 9 shows the Hispanic/Latino share of the total application volume. As the overall application volume decreased, the Hispanic/Latino share of the total county applicant pool also decreased from roughly 11 percent during the housing boom in 2006 to 7 percent in 2009 before rebounding to levels around 8 percent in the subsequent

years. The declining share of Hispanic/Latino applications in the face of overall declining applications from 2006 to 2011 suggests systemic barriers to opportunity of participating in the mortgage application process. In other words, the declining Hispanic participation in the mortgage market could signal the further declining Hispanic homeownership rates in the county.

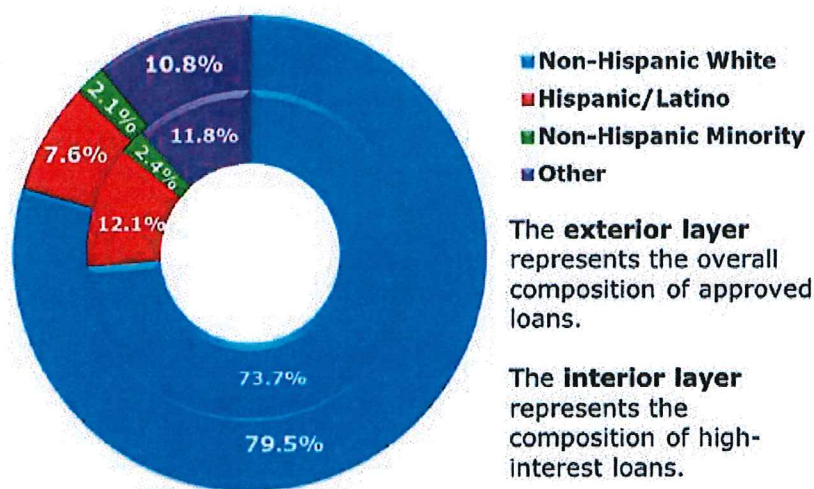
The purple line in Figure 9, representing the Hispanic share of total application volume, is juxtaposed in Figure 10 with the Hispanic share of total approved and denied applications in Weber County from 2006 to 2011. With the purple line (Hispanic application share) as the baseline, Figure 10 shows that Hispanic/Latino applicants represent a disproportionately higher share of denials (red line) and a lower than expected share of approvals (green line). Interestingly, the gap between the application and approval share nearly closed in 2009 with only a negligible increase in the differential during the subsequent two years, meaning that the Hispanic share of total approvals are increasingly more commensurate with the Hispanic share of total applications. On the other hand, the differential between the Hispanic share of denials and applications has widened since 2009.

In addition to the barriers that Hispanic applicants face in the mortgage application process, the housing impediments persist following the approval process in the form of high-interest loans. Hispanic applicants receive a disproportionately high share of high-interest loans.

For the purposes of this study, high-interest loans are defined as any loan with a reported rate spread that exceeds 3 percent for first liens and 5 percent for subordinate liens. This is the threshold

that lenders have been required to disclose since 2004. The rate spread is the difference between the loan APR and the yield of comparable Treasury securities. The Federal Reserve Board selected this threshold with the intent that the rate spread for most subprime loans would be reported and that most prime loans would not require this disclosure². Thus, the rate spread disclosure could potentially serve as a proxy for subprime lending. Note that for applications filed on or after October 1, 2009, the rate spread definition has been revised as the difference between the loan APR and the average prime offer rate, which is determined from the rates of representative low-risk

Figure 11
Composition of Approved Loans and High-Interest Loans in Weber County, 2006–2011



Source: HMDA LAR Raw Data by MSA (2006–2011)

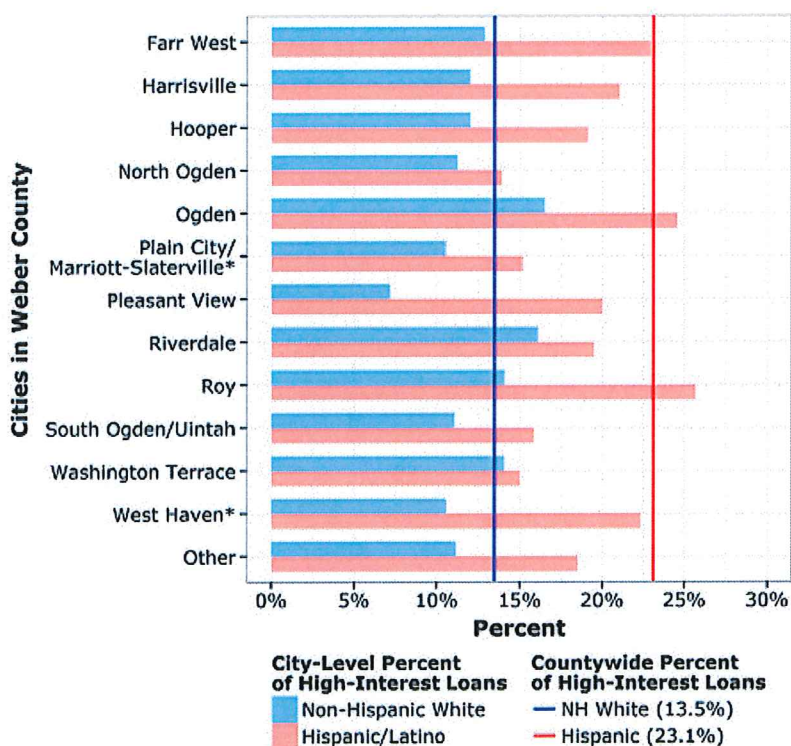
² Avery, Robert B., Kenneth P. Brevoort and Glenn B. Canner. "Opportunities and Issues in Using HMDA Data." *Journal of Real Estate Research* 29.4 (2007).

mortgages currently available in the market. The reported threshold for this new rate spread is 1.5 percentage points for first liens and 3.5 percentage points for subordinate liens.³

Figure 11 shows the composition of approved loans and high-interest loans by race/ethnicity. While Hispanic/Latino applicants represented only 7.6 percent of all approved loans from 2006 to 2011, they received a disproportionate 12.1 percent of all high-interest loans. Note that 87 percent of all high-interest loans in Davis County from 2006 to 2011 were in fact given during the peak of the housing boom in 2006 to 2007. *This disproportionately high share of high-interest loans among Hispanic applicants could be a precursor to foreclosures and thus increased housing instability.* Thus, even for Hispanics with approved mortgage loans, their higher tendency of receiving high-interest loans still reflects an underlying housing impediment that could have repercussions in long-term housing stability.

The disproportionately high prevalence of high-interest loans among Hispanic applicants is apparent across all cities in Weber County. Figure 12 shows the percent of high-interest loans among non-Hispanic white and Hispanic/Latino applicants during the 2006–2011 period. *At the county level, nearly 23 percent of Hispanic approved loans are considered high interest—over 1.7 times the rate among non-Hispanic white applicants.* The gap is more severe in Ogden and Roy, the two cities with the highest number of Hispanic applicants. Nearly a quarter of Hispanics with approved loans for properties in Ogden received high-interest loans, compared to only 16.5 percent of their non-Hispanic white counterparts. Similarly, in Roy, nearly 26 percent of approved loans issued to Hispanics are considered high interest, compared to only 14 percent of their non-Hispanic white counterparts. Washington Terrace is the only city in Weber County with relative parity in the

Figure 12
Percent of High-Interest Loans among Approved Applicants by Race/Ethnicity in Weber County Cities, 2006–2011



Source: HMDA LAR Raw Data by MSA (2006–2011)

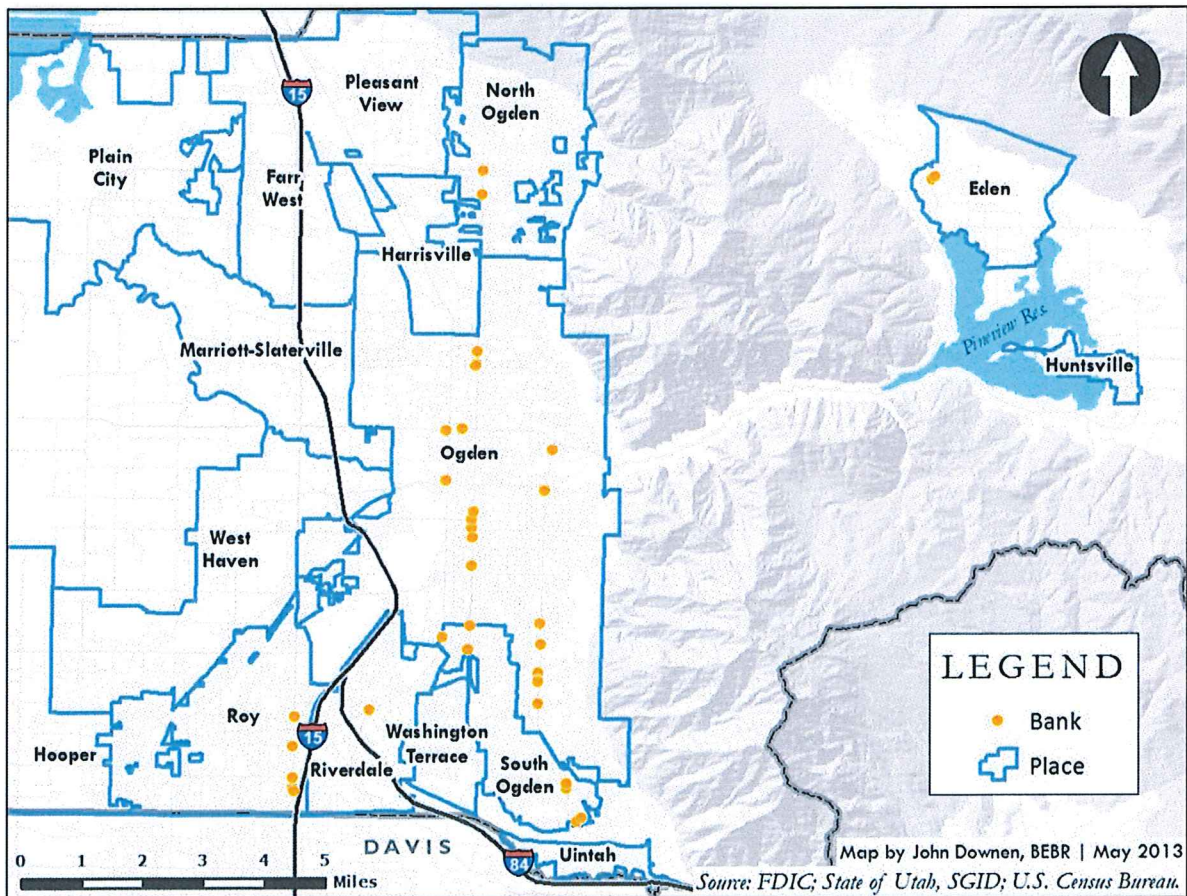
Note: The categories Plain City/Marriott-Slaterville and West Haven include unincorporated areas in the western region of Weber County, which are contained within the census tracts that encompass the three cities.

prevalence of high-interest loans, but accounts for less than 2 percent of the Hispanic applicant pool selecting Weber County properties.

Housing instability has implications in a larger context of infrastructural opportunity. Hispanic families, faced with higher-interest loans, could be forced to move frequently, resulting in elevated school mobility rates for their children. In turn, housing instability could result in lower educational opportunities. The county should examine housing and mortgage data in a broader context of opportunity.

Location of Commercial Banks and Branch Office – While lending practices show clear disparities in approval rates between Hispanics and non-Hispanic whites, this outcome does not appear to be influenced by the location of bank offices. Of course there are many non-bank establishments (mortgage companies) that also provide mortgage financing not shown in *Figure 13*. Nevertheless, the proximity to banks is another factor in the opportunity assessment of a community not only for mortgage banking but personal banking as well. The distribution of banks and branch offices are mostly concentrated in North Ogden, Ogden, Roy, and South Ogden, which account for nearly two-thirds of the Weber County population.

Figure 13
Location of Commercial Banks and Branch Offices in Weber County



Explanation of Opportunity Indices

Index of Dissimilarity for Mortgage Denials and Approvals

The degree of difference between two distributions curves can be calculated using the index of dissimilarity. The formula⁴ for the index of dissimilarity Δ shown below is tailored specifically to describe the difference between the income distribution of mortgage applications and that of denied mortgage applications:

$$\Delta = \frac{1}{2} \sum_{i=1}^{10} \left| \frac{a_i}{A} - \frac{r_i}{R} \right|$$

where

a_i = the number of mortgage applications with reported incomes in the i^{th} income decile

A = the total number of mortgage applications

r_i = the number of denied applications with reported incomes in the i^{th} income decile

R = the total number of denied applications

The index of dissimilarity is interpreted as the percentage of one group that must move to other income deciles in order to create a distribution equal to that of the other group. For instance, in comparing the application volume and denial distributions across the countywide deciles, an index of dissimilarity of 0.03 means that 3 percent of the denied applicants would have to move to another income decile in order to match the overall application distribution. This index in itself cannot specify if approvals and denials are occurring disproportionately at certain income levels. Cumulative distribution curves of total applications and approved/denied applications can provide this information graphically.

⁴ Shryock, Henry S., Jacob S. Siegel and Associates. *The Methods and Materials of Demography*, ed. Edward G. Stockwell. Condensed Edition. San Diego: Academic Press, 1976.