

Open for Citizen Review
and Comment
2/1/25 – 3/2/25

Analysis of Impediments to Fair Housing Choice

“AI”

DRAFT



Affirmatively Furthering Fair Housing Choice in Ogden
Send comments to: fairhousing@ogdencity.gov

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SECTION I: EXECUTIVE SUMMARY

Title VIII of the Civil Rights Act of 1968, more commonly known as the Fair Housing Act, ensures protection of housing opportunity by prohibiting discrimination in the sale or rental of housing based on race, color, religion, sex, and national origin (the federally protected classes). The Act was amended in 1988 to include familial status and disability status as protected classes. In June 2020 the US Supreme Court ruled that sexual orientation, LGBTQ+, and transgender are protected under the category of sex by the Fair Housing Act. The Fair Housing Act protects everyone.

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. In order to comply with HOME Investment Partnerships Grant (HOME) and Community Development Block Grant (CDBG) statutes, the AI is a strategy that creates action items and goals to supplement Ogden City's ConPlan activities and is submitted to the U.S. Department of Housing and Urban Development (HUD) along with the City's Five Year Consolidated Plan 2025-20230 (ConPlan). AI goals and objectives are designed to identify and mitigate obstacles to fair housing choice. Action items are identified to affirmatively furthering fair housing choice.

The assessment specifically includes an evaluation of:

- Existing socio-economic conditions and trends in the city, with a particular focus on those that affect housing, diversity and inclusion.
- Private lending and home appraisals practices that impact housing issues in the city.
- Citizen input and fair housing data.
- Data regarding evictions.
- Specific recommendations and activities to address real or perceived impediments that exist.

The planning process was launched in June 2024, with a Fair Housing Survey, community outreach and a comprehensive review of data relevant to housing need and related issues. Documents reviewed include local plans and ordinances; the 5-Year Consolidated Plan for Ogden City; the previous Analysis of Impediments to Fair Housing Choice, among other policy documents.

INTRODUCTION

As a recipient of U.S. Department of Housing and Urban Development (HUD) entitlement grants, Ogden City is required to Affirmatively Further Fair Housing Choice in Ogden. The Analysis of Impediments to Fair Housing choice (AI) provides the city with the means to initiate strategies to comply with the Affirmatively Furthering Fair Housing Choice regulations. The AI reviews patterns of integration and segregation; racially and ethnically concentrated areas of poverty; disparities in access to housing opportunity; and fair housing enforcement resources and activities. At its foundation, the Analysis of Impediments strives to determine how people are being impacted and if any groups are disproportionately impacted. Based on the findings of this research, the AI proposes a series of strategies to overcome the identified fair housing issues.

SUMMARY OF FINDINGS

Fair Housing affects everyone. The purpose of the Analysis of Impediments to Fair Housing Choice (AI) Report for Ogden 2024 is to define effective Actions Items that address Fair Housing issues. Ogden City Community Development Division has performed an extensive assessment to identify what resources and actions are needed to effectively address fair housing impediments. The AI included an examination of Ogden's demographics, Racially / Ethically Concentrated Areas of Poverty, Utah Healthy Places Index, Ogden District Court Eviction data, Housing Market conditions, private mortgage lending and Home Appraisal Data, Fair Housing Survey indicators and Fair Housing Complaints data. Examining these factors provides a better understanding of impediments to fair housing experienced by Ogden residents. Based on the findings of this research, the AI proposes a series of strategies to overcome the identified fair housing issues.

Top Analysis of Impediments to Fair Housing Choice Findings

1. Declining poverty rate amid population growth.
2. Steady decline in Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) over the past 14 years, in Ogden.
3. Two or more races, Race not available, Black or African American, and Native Hawaiian or Other Pacific Islanders have higher mortgage application failure rates compared to whites.
4. The [Utah Healthy Places Index](#) ranks Ogden's NRSA in 2.6 percentile. In addition, the NRSA has an 86.8% Diversity Index rating. (In other words, 97.4% of Utah communities rank higher in the Utah Healthy Places Index than the NRSA community. However, the NRSA's population has 86.8% more diversity than other Utah communities.)
5. The Federal Uniform Appraisal Data reveals a steep decrease in Appraisal Gaps between 2022 and 2023 in Utah home appraisals. Bringing Utah to less than 1% appraisal gap.
6. Eviction concerns and filed evictions in Ogden are on the increase.
7. Disability is the most common Fair Housing Complaint filed in Ogden in 2022-2023.
8. Fair Housing Survey Respondents rated Affordable Housing the top fair housing concern, followed by evictions and concerns regarding access to Fair Housing resources.

While housing issues are complex and multi-faceted, the purpose of this AI is to focus specifically on fair housing. The AI therefore examines whether housing issues are experienced differently by people protected by the Fair Housing Act. With the help of literature, research, data and maps, the AI provides the foundation for meaningful fair housing goals that address specific local issues.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE PROCESS

Developed to accompany the City of Ogden's ConPlan 2025-2030 (ConPlan), this AI has been completed with citizen participation and consultation with various community stakeholders.

Several sources contributed to the AI by providing studies and reports. This AI process included:

1. Gathering socioeconomic and housing data, employing mapping and analysis tools.
2. Soliciting community input from key stakeholders.
3. Creating and prioritizing objectives and goals to create action items.
4. Sharing a draft of the AI to encourage dialogue and comments from stakeholders and citizens.
5. 30-day public comment period and consideration of public comments.
6. City Council Work Session
7. City Council public hearing to adopt the AI

DATA

The US Federal Financial Institutions Examination Council (FFIEC) provides demographic, housing and population data by census tract nation-wide that is updated annually. In addition, FFIEC allows pooling of data at census tract level, which allows the city to select only census tracts under Ogden City jurisdiction. US Census Bureau data includes some areas outside the city's jurisdiction. To obtain current and relevant data, the Community Development Division used, where possible, FFIEC data when compiling the AI. Although US Census Bureau data is calculated from 2020 Decennial Census, which is older data than FFIEC 2024 data, it provides a comparison of Ogden City, Weber County and Utah state demographics, not available from the FFIEC. Throughout the AI, US Census Bureau, American Community Survey and FFIEC data will be used.

DATA REVIEWED:

- 2024, 2023, and 2022 Fair Housing Trends Report
- US Census data, American Community Survey and FFIEC data
- HUD Comprehensive Housing Affordability Strategy data
- Utah Healthy Places Index
- National Low Income Housing Coalition reports
- Home Mortgage Lending Data
- Uniform Home Appraisal Data
- Ogden District Court eviction data

LITERATURE REVIEW

- The GAP, A shortage of affordable homes, March 2023
- Ogden's Strategic Plan and Biennially Moderate Income Housing Report
- National Alliance to End Homelessness, State of Homeless Report
- Ogden City Housing Strategy Summary,
- Homeownership and the Stability of Middle Neighborhoods, Center for Community Progress
- Weber Co 2014 Regional AI and Weber Co. 2018 Homeless study
- OgdenCAN's Housing Needs Assessment for East Central
- HUD Comprehensive Housing Market Analysis Ogden-Clearfield, Utah January 2023
- Policy Link – Housing Futures Principles 9 <https://www.policylink.org/housing-futures>
- Gardner Business Review

- U of U Kem Gardner Policy Institute Research Briefs
- Utah Intergenerational Poverty Report
- HUD's Fair Housing Planning Toolkit
- James Wood's State of the State's Housing Market 2022-2024,
- Equitable transit-oriented development articles by Policy Link; September 2023

OUTREACH AT PUBLIC EVENTS AND COMMUNITY GROUPS:

- Ogden's Farmers' Market
- Open House at 2866 Quincy
- Renter's Open House, Sponsored by OgdenCAN and OWCAP
- Plan Ogden, Open House events
- Ogden's Community Engagement and Opportunity Commission
- Ben Lomond H.S. Family Night
- City Council Work Session
- Interfaith Works Group
- Weber County Homeless Charitable Trust Board Meeting
- City Council Public Hearing

CONSULTATION

- Ogden City Community and Economic Development's (CED) Citizen Advisory Committee
- Ogden City Council
- Ogden's Community Engagement and Opportunity Commission
- Housing Authority of the City of Ogden and Resident Advisory Board
- Weber County Homeless Coordinating Committee
- Weber County Homeless Charitable Trust

FAIR HOUSING DEFINITIONS

Affordable Housing: Housing that costs no more than 30% of a household's gross monthly income for utilities and rent or utilities and mortgage payments.

American Community Survey (ACS) - The ACS is a nationwide survey that collects and produces information on social, economic, housing, and demographic characteristics about our nation's population every year.

Appraisal gap - The appraisal gap is a statistic showing disparities between minority and white tracts, and it is measured as the difference in the proportion of appraisals below the contract price.

Area Median Income (AMI) – AMI is a key metric in affordable housing used to determine eligibility for the City's HUD-funded programs. AMI is the midpoint (median) of an area's income distribution.

CHAS – Comprehensive Housing Affordability Strategy (CHAS) data prepared by the United States Department of Housing and Urban Development (HUD).

Cost Burden households are households that spend more than 30 percent of their monthly income on housing costs.

Disparate Impact or Discriminatory Effect – HUD's 2013 Disparate Impact rule defined the term "discriminatory effect" as a practice that actually or predictably results in a "disparate impact" on

a group of people or creates, increases, reinforces, or perpetuates segregated housing patterns because of race, color, religion, sex, handicap, familial status, or national origin.

Severely Cost Burdened households are households that spend more than 50 percent of their monthly income on housing costs.

Fair Housing Choice: The Affirmatively Furthering Fair Housing Rule defined “fair housing choice” to mean that “individuals and families have the information, opportunity, and options to live where they choose without unlawful discrimination and other barriers related to race, color, religion, sex, familiar status, national origin, or disability.”

Fair Market Rent FMRs are an estimate of the amount of money that would cover gross rents (rent and utility expenses) on 40 percent of the rental housing units in an area. FMRs are used in several HUD programs, including determining the maximum amount a Housing Choice Voucher.

https://www.hud.gov/sites/dfiles/PA/documents/FMR_FAQs.pdf

Federal Financial Institutions Examination Council (FFIEC) is a formal U.S. government interagency organization consisting of five banking regulators that is empowered to prescribe uniform principles, standards, and report forms to promote uniformity in the supervision of financial institutions and is empowered to facilitate Home Mortgage Disclosure Act and census tract data.

Housing Wage is the wage needed for a household to rent a home and pay for utilities without paying more than 30% of their income on housing.

HUD – United States Department of Housing and Urban Development.

Impediments to fair housing choice are any actions, omissions, or decisions taken because of one’s membership in a protected class which restricts 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 based on one’s membership in a protected class.

LGBTQ+ - Individuals identifying as lesbian, gay, bisexual, transgender and queer. The + represents the limitless sexual orientations and gender identities used by members of the LGBTQ+ community.

Low and Moderate Income Person: A person’s who is a member of household, where the household income does not exceed 80 percent of the median household income for the area. Very low income is defined as 50% of the median household income for the area, Extremely low-income is defined as 30% or below median household income.

Racially and Ethnically Concentrated Areas of poverty (RCAP/ECAP) A RCAP is a census tract that has a minority population at 50% or greater and poverty rate at 40% or greater, or three times the poverty rate of the county.

Protected Classes

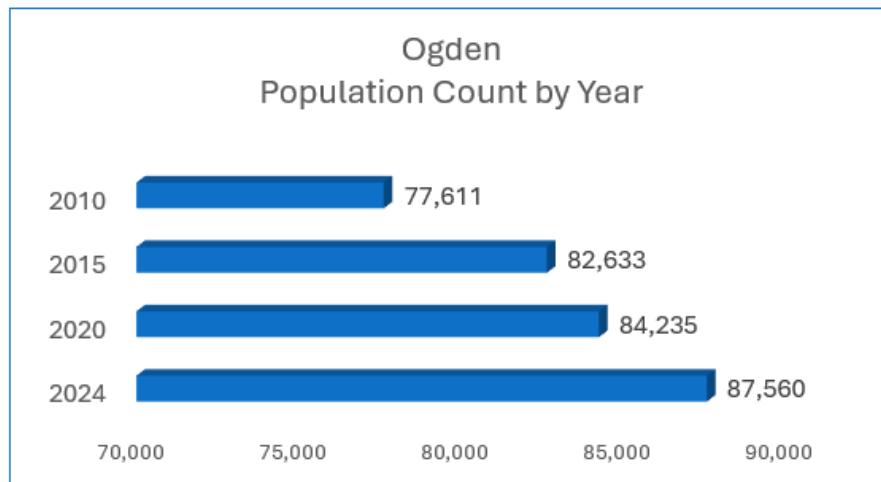
- Disability
- National origin
- Color
- Sex
- Familial status
- Race
- Religion

SECTION II: COMMUNITY PROFILE

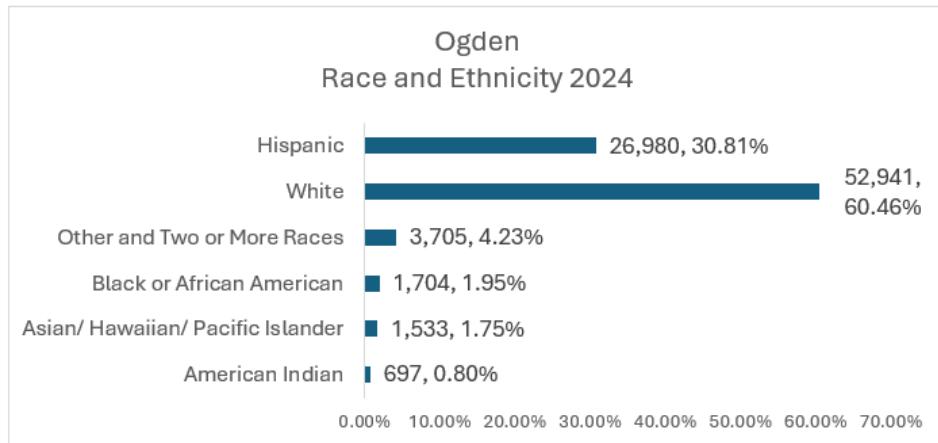
A key component in understanding impediments to fair housing choice is understanding the city's history and demographics. Ogden City is located in Weber County, Utah. Ogden's population is 87,560, making the city Utah's eighth-largest community. Nicknamed Junction City in the early 1900s, Ogden was the transfer point between the Union Pacific and Central Pacific railroads. More than 100 trains a day stopped at Ogden's Union Station filled with people traveling in every direction. As Interstate highways and passenger jets became popular, the city fell into hard times. Between 1950 and the late 1990s, the city fell into a period of decay. The town was crippled with economic depression. After the Utah 2002 Winter Olympics, which hosted events in Ogden, the city began to rebuild itself around the outdoors. Ogden has been nationally recognized for job growth, with growth across diverse industries including outdoor recreation, the Information Technology (IT) / software sector, and aerospace and advanced manufacturing. Downtown Ogden has been revitalized with new businesses, housing, and public gathering places.

DEMOGRAPHICS

FFIEC census tract demographic data reveals Ogden's population has grown from a population count of 77,611 in 2010 to 87,560 in 2024. A 12.82% increase in population since 2010. As Ogden's population has increased, the percentage of minority population also increased from 28.67% in 2020 to 39.54% in 2024.

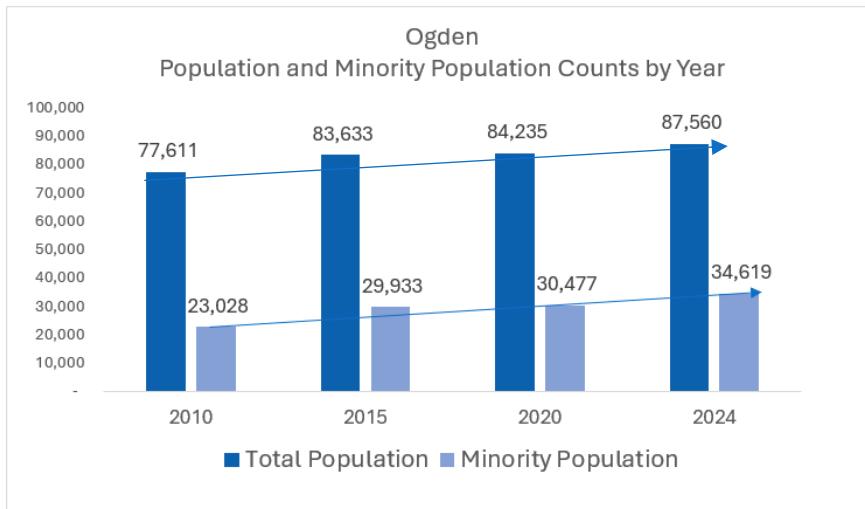


Source: FFIEC Census Tract demographic data source Nov 2024.



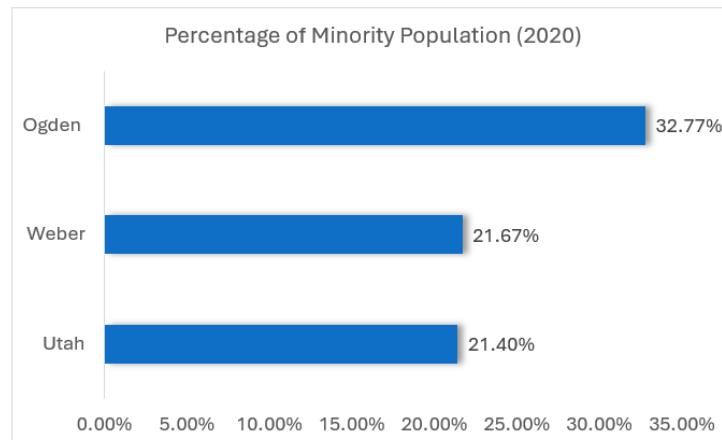
Source: FFIEC 2024 Census Report – Summary Census Population Information

Ogden's Minority Population 34,619 (FFIEC 2024 estimate)



Source: FFIEC 2024 Census Report – Summary Census Population Information

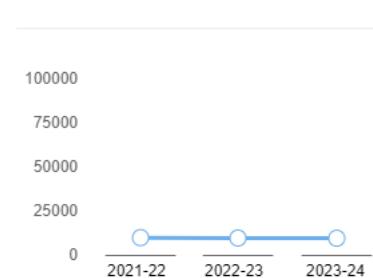
Demonstrating Ogden's uniquely diverse population, data shows Ogden has a higher percentage of minority population than the county and state population. In 2010, the minority population in the city reached 23,028 individuals, 28.67% of the population. By 2024, the number of minority individuals in the city had increased to 34,619 individuals, 39.54% of the population. Nearly 40% of Ogden's population is of a minority heritage. Nearly 78% of the minority population in Ogden are of Hispanic heritage. The FFIEC 2024 data estimates Ogden's Hispanic population at 26,980 individuals. It is estimated that 31% of the entire population is Hispanic. In 2020, Ogden's population had a greater percentage of minorities than Weber County and Utah state.



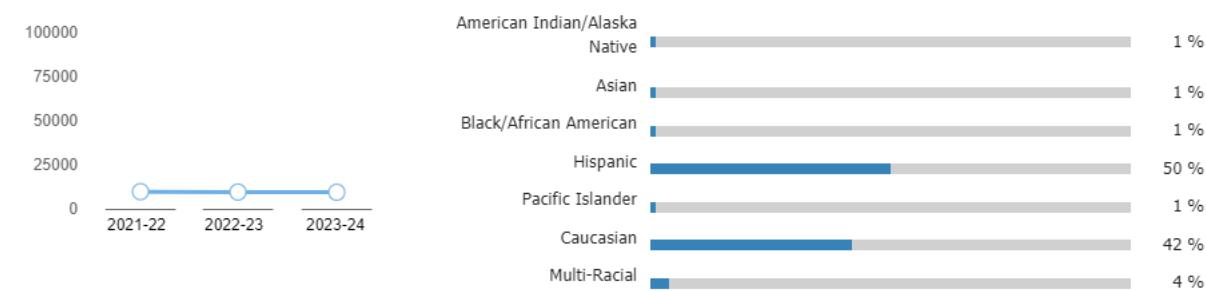
Cultural diversity is even more pronounced in Ogden's youth population. Many of the Hispanic individuals in Ogden are of the younger generation. A review of the Ogden School District's demographic data shows that 50% of children enrolled in the school district are of Hispanic heritage. The Ogden School system is a minority-majority population, in that over half of students enrolled in Ogden Schools are of minority populations. Multi-cultural diversity is a reality with Ogden School District student enrollment reaching 50% of the student population as Hispanic.

OGDEN SCHOOL DISTRICT DEMOGRAPHICS 2023-2024

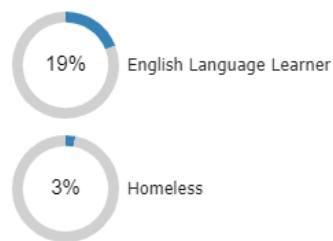
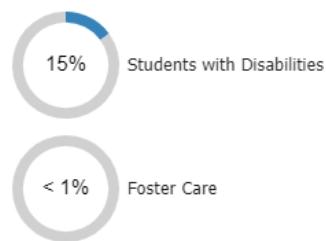
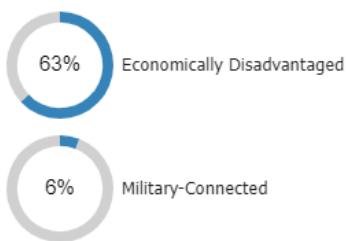
STUDENT ENROLLMENT OVER TIME



POPULATION BY RACE/ETHNICITY



POPULATION BY STUDENT GROUPS



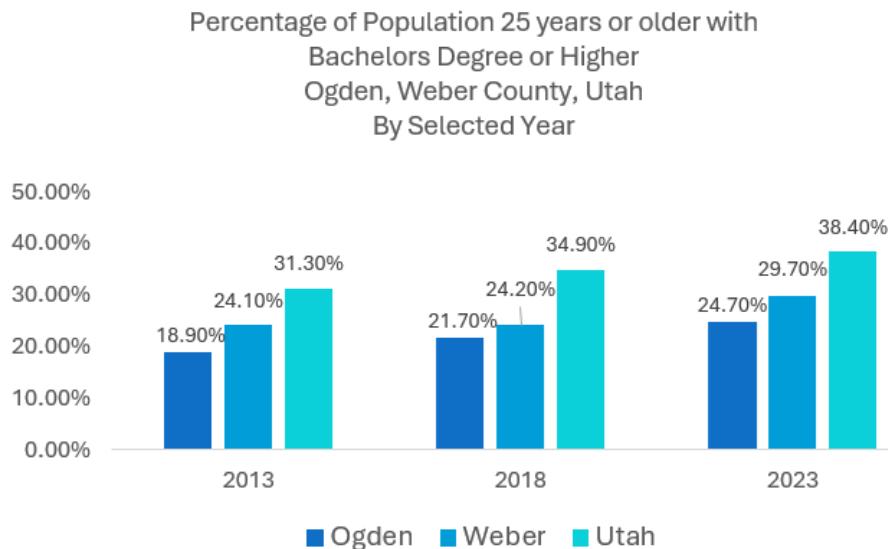
Source: *Ogden School District Profile*. Utah State Board of Education. (n.d.).
<https://reportcard.schools.utah.gov/District/Profile?DistrictID=1183&schoolyearendyear=2024>

DEMOGRAPHIC SUMMARY

Demographic trends in Ogden are changing. Data illustrates a steady population increase from 2010 to 2024. Corresponding to the population increase, the minority population increased by 50% from 23,028 in 2010 to 34,619 in 2024. Ethnic diversity significantly increases when considering the younger generation. While the percentage of White alone population had a decline of -3.10% from 54,583 in 2010 to 52,941 in 2024. Nearly forty percent of the entire population identifies as a minority, highlighting the diverse culture in Ogden.

EDUCATION

Access to education is one of the four indicators of opportunity ([opportunity index](#)). American Community Survey (ACS) 2023 1-year estimate calculates, in Ogden, nearly twenty-five percent (24.7%) of adults (individuals at 25 years of age and older) are college graduates. In comparison, nearly thirty percent (29.7%) in Weber County and over thirty-eight percent (38.4%) of adults in Utah are college graduates. The percentage of Ogden residents over the age of 25 having attained a college degree is less than Weber County's and Utah's adult populations that have achieved a college degree.



SOURCE: 2013, 2018, 2023: ACS 1-Year Estimates; S1501 Educational Attainment

In Ogden, the minority race population counts are smaller than the ACS data provides for subject tables, such as Educational Attainment. The Hispanic or Latino population is large enough that data is available by ACS. In review of the limited data available, thirty-one percent (31.12%) of Ogden's White adult population and not Hispanic or Latino have attained a college degree compared to less than 10 percent (9.64%) of Ogden's Hispanic or Latino adult population have attained a college degree.

Ogden Population 25 Years and Older with College Degree by Ethnicity	
Whites Alone (Non-Hispanic/Latino)	31.12%
Hispanic or Latino Origin	9.64%

SOURCE: 2023: ACS 1-Year Estimates; S1501 Educational Attainment

EDUCATION SUMMARY

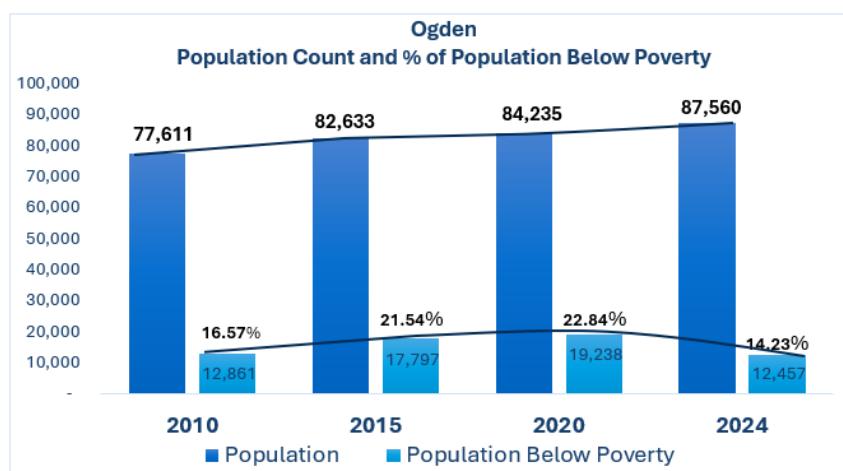
Most occupations that have minimum or no educational attainment requirements pay less than what is needed for a housing wage. For example, the median one-bedroom housing wage in Utah is \$18.64. Fast food workers, cashiers, waiters, and home health care aides have a median wage of under \$15.00 an hour, far below what is required to rent a one-bedroom apartment. In comparison, occupations (Marketing specialist, accountants, project managers, financial services representatives and accountants) that require higher educational attainment earn above the median wages needed to rent a two-bedroom apartment. Higher education often provides higher paying jobs with higher incomes, which in turn provide greater housing choices.

In Ogden, the American Community Survey (ACS) data 2023 1-year estimates Ogden's adult population (25 years of age or older) is 54,714 with 14,218 (26%) of these adults have attained a bachelor's degree of higher. However, over 40,000 Ogden adults have less than a college degree education. This provides a glimpse of educational attainment conditions that influence opportunities in housing.

Earners that have less than a college education are often in occupations that pay less than a Housing Wage. As rent prices become unaffordable housing options for lower income households become scarce. Ogden's population has lower education rates, few adults with a bachelor's degree or higher, than Weber County or Utah populations' rates of college degree attainment. Data shows that the percentage of adult Hispanics have the lowest rate of college degrees. The ability for households to generate income is often dependent on higher levels of educational attainment, which in turn creates more housing choices. The data suggests that there are ethnic disparities in educational attainment, which in turn facilitates lower incomes and fewer housing choices for minority individuals.

INCOME & RACIALLY / ETHICALLY CONCENTRATED AREAS OF POVERTY (R/ECAP)

Income is not a protected class by the Fair Housing Act. Although, income is a direct measure of mobility. The more income a household earns, the more housing options they have available.



Source: US Census 2020 Decennial Census.

Poverty rates are key indicators of a community's housing opportunities or lack of housing opportunities for residents. Current FFIEC data calculates a drop in the overall percentage of people

below poverty. Although this is a positive demographic trend, there are six census tracts 2003, 2004, 2012, 2017, 2018 and 2019 with a poverty rate of over 50% of residents. Ogden's East Central census tracts 2009, 2011, 2012 and 2018 have poverty rates above 30%. As housing becomes less affordable, housing options for people with lower incomes are scarce.

Ogden's poverty rate has marked significant changes in the last decade. Up until 2020, the poverty rate in Ogden had a clear upward trend. In 2024, the FFIEC data estimates that for the first time Ogden's poverty rate declined. The 2024 poverty rate at 14.23% is below the 2010 poverty rate of 16.57% for Ogden.

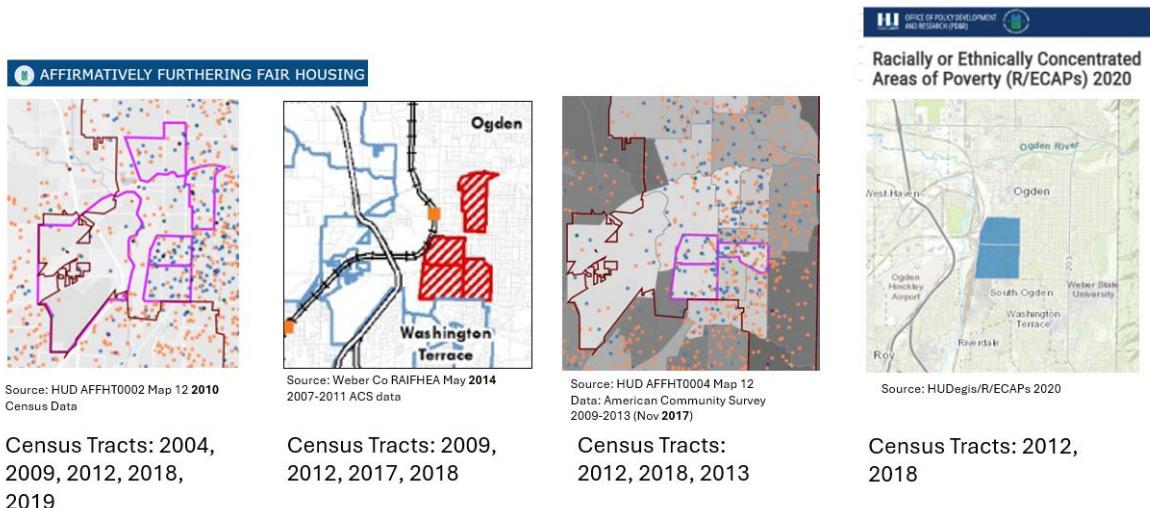
Minority census tracts poverty levels are changing. The poverty rate in census tracts with minority populations of 30% or more range from 6.86% to 34.59% poverty rate, which demonstrates an interesting trend. Census Tract 2012 has the highest minority population count and it has the highest poverty rate at 34.59%. However, Census tracts with the high minority populations, over 50% minority population, range in poverty rates between 14.37% and 34.59%. There is no consistent correlation between the rate of minority population to the rate of poverty in an Ogden census tract. Poverty is not limited or concentrated to only high minority census tracts.

Ogden Percentage of Population Below Poverty by Year					Ogden Population Count, Percentage Population Below Poverty, Percentage of Minority Population By Census Tract			
Census Tract	YEAR				Census Tract	Population	% Poverty	% Minority
	2010	2015	2020	2024				
2001	5.87%	18.55%	15.05%	8.70%	2001	4,586	8.70%	30.46%
2002	13.71%	17.85%	21.84%	10.99%	2002	14,607	10.99%	44.88%
2003	15.09%	11.24%	30.40%	17.37%	2003	8,324	17.37%	51.82%
2004	18.66%	35.90%	24.93%	17.26%	2004	1,829	17.26%	55.49%
2005	11.88%	18.93%	12.34%	6.86%	2005	6,255	6.86%	34.23%
2006	7.47%	10.93%	10.85%	11.26%	2006	4,488	11.26%	26.92%
2007	9.65%	12.04%	8.73%	8.09%	2007	3,270	8.09%	23.76%
2008	22.76%	28.57%	25.55%	19.69%	2008	4,531	19.69%	44.12%
2009	28.42%	49.89%	37.47%	28.99%	2009	4,200	28.99%	44.07%
2011	41.31%	34.52%	48.73%	20.38%	2011	2,525	20.38%	30.57%
2012	41.44%	45.88%	47.96%	34.59%	2012	2,378	34.59%	66.53%
2013	27.25%	22.97%	28.27%	17.04%	2013	6,212	17.04%	31.16%
2014	8.43%	12.44%	9.73%	6.21%	2014	3,213	6.21%	18.02%
2015	8.42%	13.09%	13.75%	11.07%	2015	4,261	11.07%	18.52%
2016	15.82%	24.62%	23.36%	14.72%	2016	4,156	14.72%	29.96%
2017	14.82%	17.52%	26.51%	14.37%	2017	3,460	14.37%	50.95%
2018	15.80%	33.16%	36.79%	20.60%	2018	2,421	20.60%	60.84%
2019	39.98%	33.77%	41.55%	14.79%	2019	1,284	14.79%	55.06%
2020	4.61%	12.91%	14.18%	9.32%	2020	5,560	9.32%	20.72%
TOTAL	16.57%	21.54%	22.84%	14.23%	TOTAL	87,560	14.23%	39.54%

Source: FFIEC 2024 Census Report – Summary Census Population Information

RACIALLY AND ETHNICALLY CONCENTRATED AREAS OF POVERTY (R/ECAP)

A R/ECAP is a census tract that has a minority population at 50% or greater and a poverty rate at 40% or greater, or three times the poverty rate of the county. The Weber County poverty rate is 8.5% (US Census Bureau QuickFacts July 1, 2023). Therefore, a Weber county census tract is considered to have a high concentration of poverty if 25.5% or more of the population is living in poverty. RCAP and ECAP tracts are often communities with low-valued homes and with a high proportion of renters. 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 other areas of the county, these concentrations of poverty would be less severe in Ogden.



HUD's Affirmatively Furthering Fair Housing mapping tool AFFH0002 identifies R/ECAPs for local governments. A review of the HUD mapping tool for a ten year period illustrates a decrease in the number of R/ECAPs in Ogden between 2010 and 2020 data. HUD CHAS data 2010 Map highlights five R/ECAPs, while the 2020 map identifies two R/ECAPs in Ogden. The data indicates a positive demographic trend with a steady reduction in the R/ECAPs in Ogden between 2010-2020.

NEIGHBORHOOD REVITALIZATION STRATEGY AREA (NRSA) AND RCAPS

The City's Five Year Consolidated Plan (2020-2025) has implemented a Neighborhood Revitalization Strategy Area (NRSA) plan that identifies R/ECAPs as communities in distress and implemented a plan to target HUD resources to these census tracts. Ogden's two R/ECAPs are in Ogden Neighborhood Revitalization Strategy Area (NRSA). The NRSA also has the commitment of Ogden Civic Action Network (OgdenCAN), Jefferson Neighborhood group, Your Community Connection (YCC), My Hometown, Ogden Weber Community Action Partnership (OWCAP), Weber County Homeless Charitable Trust, Marshall White Center, and Weber State University (WSU), as well as the Ogden Chamber. These partners have contributed significant resources to the community and continue to show commitment through initiatives and resident engagement in the NRSA. Since Ogden's NRSA designation, there has been a combined community effort which includes citizen involvement, Ogden's HUD funding programs, city-funded public improvements to the NRSA and housing initiatives to provide affordable housing and to promote income diversity in the NRSA and a wealth of community partners targeting significant resources to the NRSA, with the goal of providing equitable solutions to improve NRSA conditions.

INCOME & R/ECAP SUMMARY

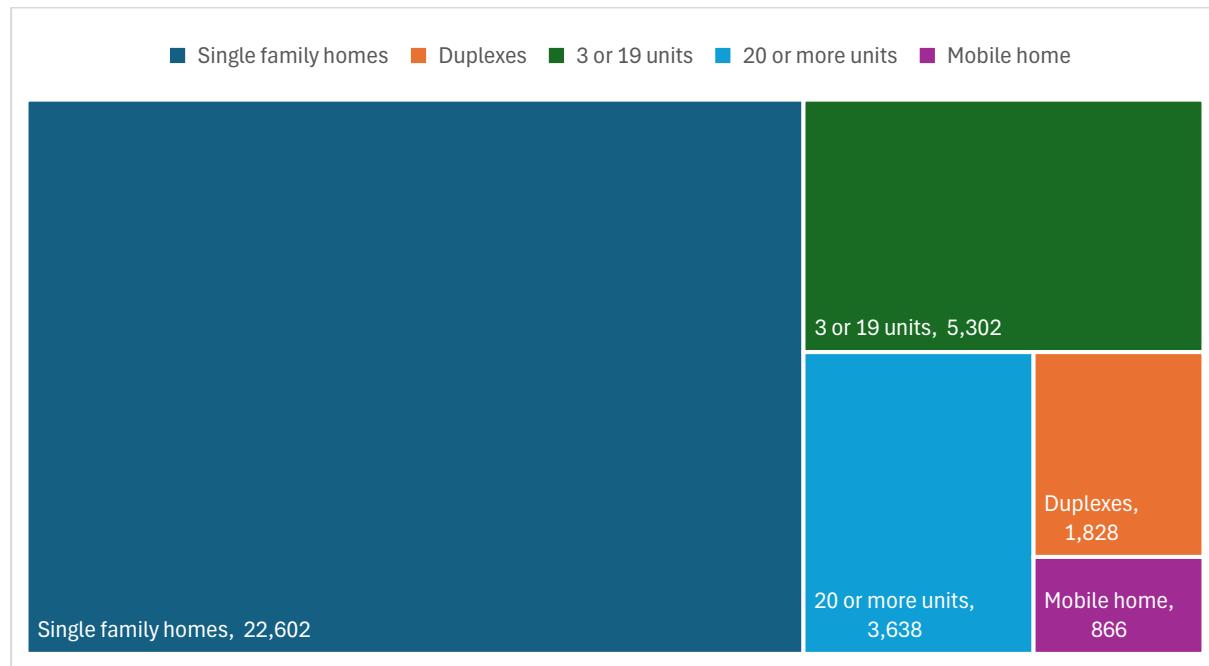
Although income is not a protected class by the Fair Housing Act, extremely low-income renter householders are more likely than other renter householders to be seniors, have disabilities, be in school, or be single-adult caregivers. Disability and familial status are protected classes. Although high poverty rates are not limited to high minority population census tracts; census tract 2012 has the highest minority population over 66% and the highest poverty rate at 34.59 of the census tract population. Data indicates racial disparities exist, but the demographics are changing, and poverty is wide-spread and not limited to high minority census tracts. The overall city poverty rate declined from 16% in 2020 to 14.23% in 2024. All census tracts, except census tract 2006, showed a decline in poverty rate between 2020 and 2024.

With the current Five Year Consolidated Plan and NRSA in place, there has been a steady decline in racially concentrated areas of poverty in Ogden. There are two R/ECAP in Weber County, and both are in Ogden. The two R/ECAP in Ogden indicate a need to renew the NRSA, which will initiate policies that equitably address adverse neighborhood conditions.

SECTION III: HOUSING PROFILE

The FFIEC data for 2024 estimates there are 34,394 residential housing units in Ogden. 31,439 (91.41%) of these units were occupied. Owner-occupied units accounted for sixty percent (60.18%) of all occupied units, while renter-occupied units accounted for 40% of all occupied housing units. Ogden City has a very high share of rental units, 40% of housing units in Ogden are rental units. In Utah, statewide about thirty percent (30%) of the occupied housing inventory are rental units, well below the share in Ogden city.

Ogden City Housing Types



Source: US Census Bureau. (n.d.). *DP04 Selected Housing Characteristics, ACS 5-Year Estimates Data Profiles*. https://data.census.gov/table/ACSDP5Y2021.DP04?g=160XX00US4955980_040XX00US49&hidePreview=true

FFIEC 2024 Data for Ogden, Utah estimates:

- 34,394 Housing Units in Ogden
- 91.41% (31,439) housing units in Ogden are occupied.
- 8.59% (2,955) are vacant
- 60.18% (18,921) of occupied housing units are owner-occupied
- 39.82% (12,518) of occupied housing units are renter-occupied

HOUSING AGE AND CONDITION

Ogden City has an older housing stock than Weber County. Over 44 percent of Ogden's housing stock was built prior to 1940 – a higher percentage than Weber County's 27.2 percent. Only 10.5 percent of Ogden's housing stock was built between 1980 and 1990. The high percentage of housing units constructed prior to 1940 indicates that Ogden may have an inordinate number of units that are in poor condition or require some degree of rehabilitation. It's important to note that although homes are older, this older housing stock is important to the City's character and its rich history.

Between 2021 and 2024, 2,569 new housing units were built in Ogden. Two thousand and seven of these new housing units are apartments, 498 are townhomes/condos and 64 single-family homes.

Ogden's Single-Family Housing Stock

- 68 Years the average built year of a home in Ogden (1956).
- 4,067 (20%) of homes in Ogden are over 100 years old
- 14,910 (73%) of homes in Ogden are over 50 years old
- 1,314 square feet, the average home size in Ogden
- 2,448 square feet, the average home size in Weber County.
- 7,405 square feet, the median lot size in Ogden.
- 10,805 square feet the median lot size in Utah

HOUSING AGE AND CONDITION SUMMARY

As an older and mostly built-out community, Ogden's housing stock is different from most other cities in the state. Much like the city itself, Ogden's housing stock is older than the housing in most of the surrounding communities. With the average home size nearly 1,000 square feet smaller than Weber County's average home size, 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 few housing choices options than moving to other cities in the county. As a nearly built-out community, most new development, either residential or commercial, faces challenges in redeveloping the limited property available. The cost of land acquisition and consolidation, demolition, environmental remediation, economic obsolescence, and an overall increase in property values are among the most significant challenges in redeveloping property in Ogden. Largely due to its age, housing in Ogden has consistently been more affordable compared to surrounding communities. While this has served as an advantage in some areas, the gaining housing stock and smaller sized homes has also led to disinvestment over the years and has contributed to an increase in housing problems.

HOUSING PROBLEMS

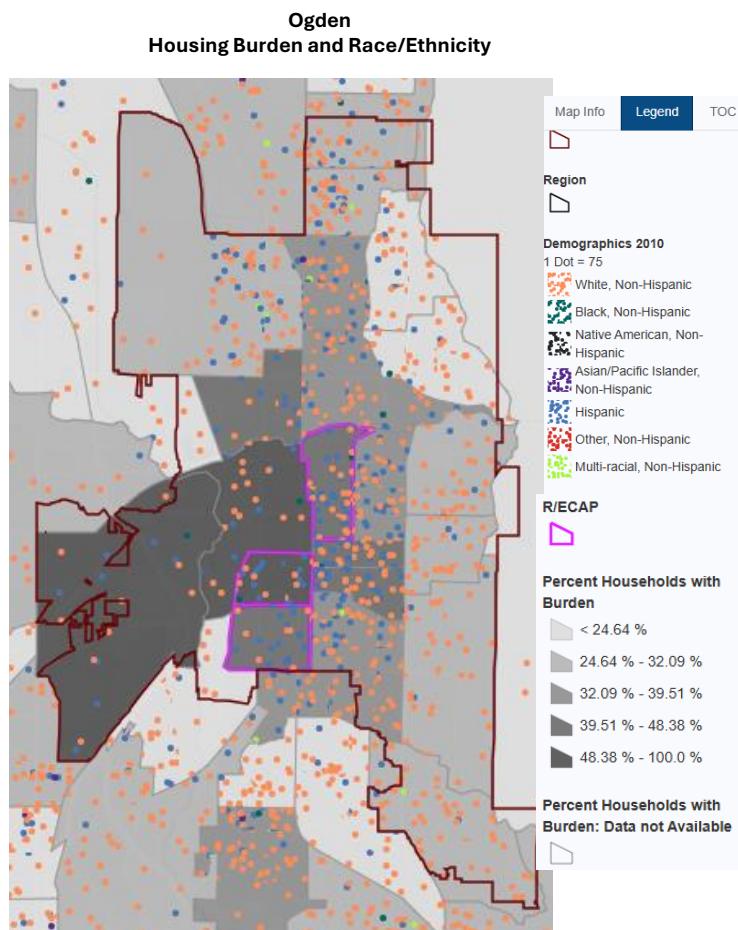
HUD's Comprehensive Housing Affordability Strategy (CHAS) data provides a means to measure the number of households experiencing housing problems. Each year, American Community Survey

(ACS) data from the U.S. Census Bureau is updated to estimate the extent of housing problems and housing needs, particularly for low income households. The data estimates how many low-income households are experiencing housing problems within Ogden City.

As defined by HUD, the four housing problems are:

1. The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%.
2. The four severe housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 50%.
3. Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs", which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

When housing cost burdens are high, households often make difficult choices such as living in unhealthy or poor-quality housing units, living with others to save money (which results in over-crowding), or limiting the use of utilities. The lack of affordable rental housing units puts many more households at risk of homelessness.



The Housing Burden and Race/Ethnicity Map, illustrates the extent of housing problems in Ogden. Each dot represents 75 individuals that are experiencing a housing problem, the color indicates which race or ethnic group is identified. In addition, cost burden is displayed; the darker the shade of grey indicates the higher the extent of cost burden for the census tract's population. The map demonstrates all census tracts in Ogden have populations experiencing one of the four housing problems.

The West Ogden and East Central census tracts have the highest concentration of housing problems. Census tracts 2011, 2012 and 2019 have over 50% of residents that experience a housing problem and have over 30% minority population.

Source: Ogden Map 6 – Housing Problems, (2024, November 18), HUD AFFH Mapping Tool, Data Version AFFHT0006, Released 7/10/20.

HUD CHAS data estimates that in total 9,950 households in Ogden are experiencing one of the four housing problems.

Number of Ogden Households with a Housing Problem - 2024 estimate

HOUISNG PROBLEMS	Owner	Renter	Total
Household has at least 1 of 4 Housing Problems	4180	5770	9,950
Household has at least 1 of 4 Severe Housing Problems	1865	3410	5,275
Cost Burden >30% to <=50%	2390	2610	5,000
Cost Burden >50%	1235	2440	3,675

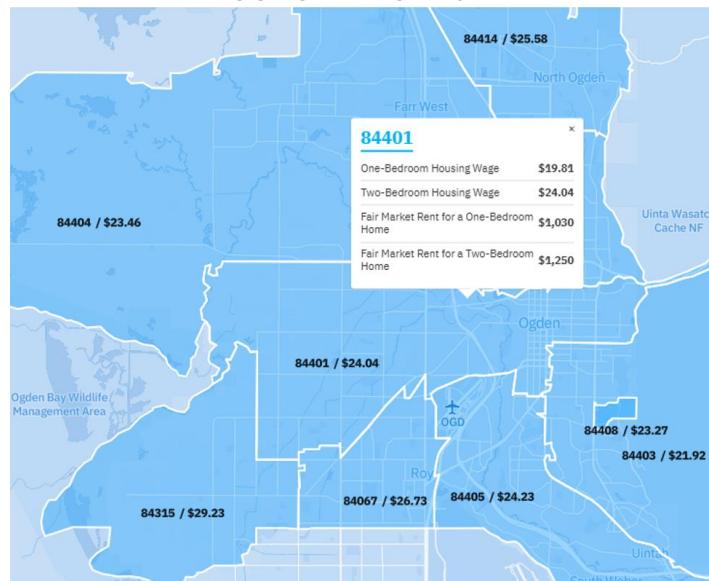
Source: Consolidated Planning/CHAS Data, (2024, November 7), HUD Office of Policy Development and Research, <https://www.huduser.gov/portal/datasets/cp.html#year2006-2021>

HOUSING AFFORDABILITY

RENTAL HOUSING AFFORDABILITY

Rental housing affordability estimates are calculated by the National Low Income Housing Coalition (NLIHC) annually. The NLIHC estimates that in Ogden, the Fair Market Rent (FMR) for a two bedroom home is \$1,250. The Housing Wage (the wages needed to rent a 2-bedroom FMR) is \$24.04 an hour. An Ogden household would have to earn approximately \$4,500 a month or \$54,000 annually to afford a two bedroom home. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into an hourly Housing wage of \$25.96 / per hour for Ogden's Housing wage. It is estimated that the mean wages for a renter in Ogden is \$16.80 falling far short of what is needed to rent an apartment. A renter earning Ogden's mean wages \$16.80 / hour would need to work 1.5 full time jobs to afford an apartment at FMR¹.

OUT OF REACH 2024



Source: Utah Out of Reach State Facts, National Low Income Housing Coalition. (2024, October 8). <https://nlihc.org/oor>

¹ Source: Utah Out of Reach State Facts, National Low Income Housing Coalition. (2024, October 8). <https://nlihc.org/oor/state/U>

The graphic above displays the Housing Wage needed for a two-bedroom rental unit in Ogden at \$24.04 an hour. The Housing Wage is the wage needed for a household to rent a home and pay for utilities without paying more than 30% of their income on housing. The Housing Wage is estimated at \$24.04 an hour, in comparison, the average renters age in Ogden is \$16.50 an hour, fall far short of the income needed to rent an apartment at market rate.

For many households, incomes are not sufficient to afford Fair Market Rents. Ogden residents are not alone, nationwide millions of renters are facing a housing crisis, as national wages are not keeping up with rents. Although Ogden has a higher percentage of obtainable homes (homes valued below \$400,000) compared to the surrounding cities, there are not enough affordable homes in Ogden for low- to-moderate-income households.

Rising rents and incomes not keeping up means even more renters are facing severe housing cost burdens. Over 5,000 Ogden-Clearfield households experience housing cost burden, with paying more than 30% of their income on housing. These households have the highest risk of eviction and homelessness.

HOUSING AFFORDABILITY

The graphics below are from The Utah Housing Affordability Dashboard, compiled by the Kem C. Gardner Policy Institute The University of Utah, provides a measure of housing affordability. The data indicates a significant lack of affordable rental housing units for households below 80% Area Median Income (AMI). The lower the household income, the fewer affordable housing options are available.

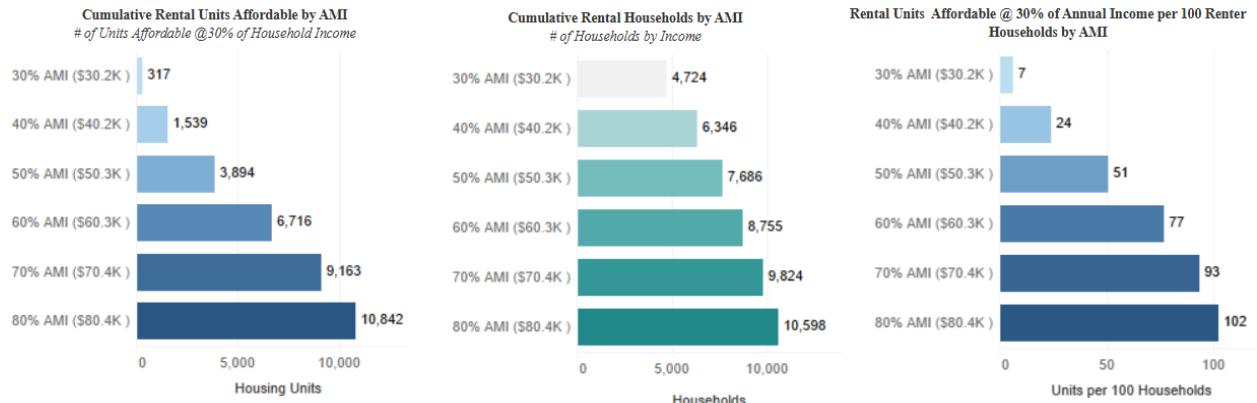
At A Glance

\$110,200	Area Median Income (AMI) for Ogden-Clearfield
\$ 33,120	30% AMI
\$ 828	Rent affordable at 30% AMI
\$ 1,030	One Bedroom Fair Market Rent in Ogden
\$ 1,250	Two Bedroom Fair Market Rent in Ogden
\$ 16.50	Average Renter wage in Ogden
\$ 7.25	Minimum Wage in Utah
\$ 24.04	Average renter wage needed for a 2 bedroom apartment at FMR in Ogden
9,590	Households have one of the four Housing Problems in Ogden-Clearfield
5,000	Households are paying more than 30% of their income on housing, in Ogden-Clearfield

Source: Utah Out of Reach State Facts, . National Low Income Housing Coalition. (2024, October 8).

<https://nlihc.org/oor/state/ut>





Source: The Utah Housing Affordability Dashboard, (2024, November 4), Kem C Gardner Policy Institute, The University of Utah, <https://gardner.utah.edu/affordable-housing-dashboard/>

Ogden

Number of Households with Cost Burden

Housing Cost Burden Overview	Owner	Renter	Total
Cost Burden <=30%	15,130	7,245	22,375
Cost Burden >30% to <=50%	2,390	2,610	5,000
Cost Burden >50%	1,235	2,440	3,675
Cost Burden not available	105	355	460
Total	18,855	12,650	31,505

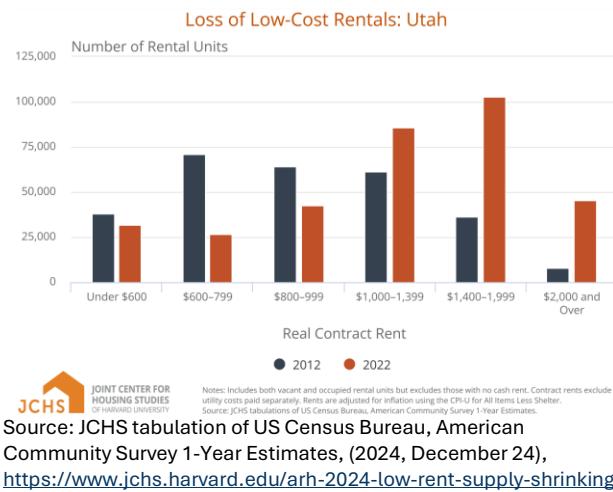
Source: Consolidated Planning/CHAS Data, (2024, November 7), HUD Office of Policy Development and Research, <https://www.huduser.gov/portal/datasets/cp.html#year2006-2021>

HUD's CHAS data for housing cost burden estimates that in Ogden in 2024, 20% of owner-occupied housing units are occupied by households that are cost burdened and 43% of Ogden renters are cost burden, paying more than 30% of household income on housing. Of the 20% of owner-occupied housing units with a cost burden 36% are severely cost burdened and are paying between 30% and 50% of household income on housing and 52% of those renters with a cost burden are severely cost burden. A record number of Ogden residents are cost burdened and facing housing instability. Nationwide "Renters' household incomes were only about 20% higher than in 1985, while home prices had increased by 90% (adjusted for inflation)"².

LOSS OF LOW-INCOME RENTAL HOUSING

Table # Loss of Low-Cost Rentals illustrates the extent of the rental housing affordability state-wide. Between 2012 and 2022 there is a noticeable decline in the number of rents below \$1,000 a month and a significant increase in the number of rents over \$1,000 a month. More renters are housing cost burdened.

² ¹Source: JCHS tabulation of US Census Bureau, American Community Survey 1-Year Estimates, (2024, December 24), <https://www.jchs.harvard.edu/research-areas/research-briefs/deteriorating-rental-affordability-update-americas-rental-housing>



RENTER AFFORDABILITY SUMMARY

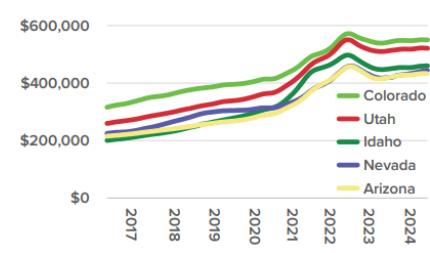
There are two main drivers affecting rent affordability, incomes not keeping up with rent increases and the lack of affordable housing units. Rents have escalated in the past several years and have outpaced income growth for renters. A renter earning Ogden's mean wage of \$16.80 an hour would need to work 1.5 full-time jobs to afford an apartment at Fair Market Rent. More low- to- middle income households are becoming cost burdened. Rents increased for all income levels, causing the number of affordable rental units to drop to a significantly low supply of affordable rental options. The new supply of rental units being built is not enough to meet the need. This places a high demand on all rental units, resulting rent increases, making it difficult for low- to-moderate income families to find units that are affordable. The number of cost burdened renters have reached an all time high.

OWNER AFFORDABILITY

Households that already own a home and are low-income are more likely to be cost burdened than moderate- and upper-income households. This may be the result of a lack of affordable homeownership opportunities, a lack of opportunity for upward economic mobility, or loss of income (i.e. seniors on a fixed income, or households that have a loss of income from death or divorce, etc.). Utah housing prices have increased 50% since 2020 and doubled between 2016 to 2022.

Median home sales prices still below 2022 peak.

Figure 3: Median Home Sale Prices in Utah, Colorado, Idaho, Nevada, and Arizona, 2017-2024

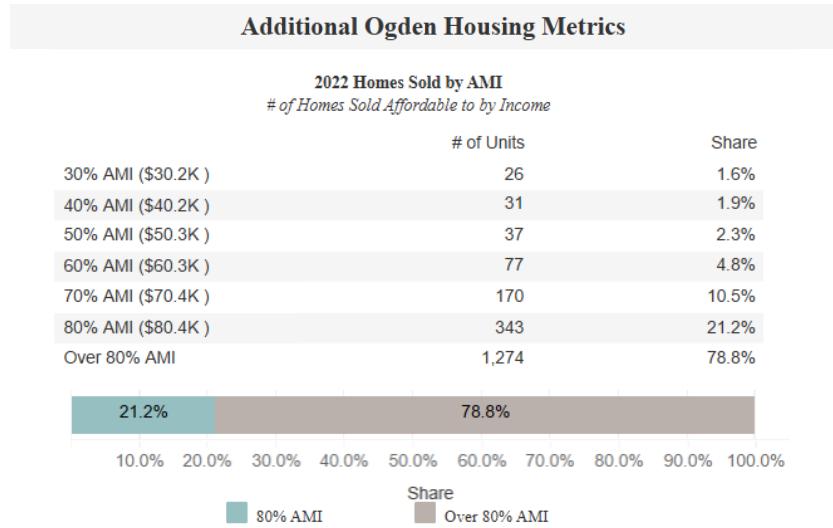


The chart, Median home sales prices still below 2002 peak, provides an illustration of the annual increase in housing prices from 2017 to 2024 for Utah in comparison to other western states. Although home sales prices peaked in 2022 and there is a downward trend, the Utah median home sales price is above \$500,000, and not affordable to low-to-moderate income households³.

Source: Zillow.

³ Source: Utah Priorities Project, 2024 Priorities Brief #1, Housing Affordability, (2024, November 7), Utah Foundation,

The Additional Ogden Housing Metrics graphic provides an illustration of the number of housing units sold in 2022 by affordability, calculated by the household's Area Median Income (AMI) affordability category. The data estimates that 78.8% of all homes sold in 2022 were affordable to households at an income over 80% AMI and only 21.2% were affordable to households below 80% AMI.



Source: Additional Ogden Housing Metrics, The Utah Housing Affordability Dashboard, (2024, October 2), <https://gardner.utah.edu/affordable-housing-dashboard/>

The Cost of Housing Index (CHI) is a measure of housing affordability. It calculates the median household income needed to make a mortgage payment on a median-priced home for a community. HUD considers any household paying more than 30% of their income towards housing costs as a cost burdened household. The CHI is used to convey the housing cost burden that middle income and low-income families experience in a community. The Cost of Housing Index for Ogden is 37%, which means a typical family in Ogden would need to allocate 37% of its pre-tax income to cover the mortgage payment for a median-priced home.

Cost of Housing Index (CHI) - Q3 2024

CHI: % of typical family's income needed for mortgage payment.

Low-Income CHI: % of low-income* family's income needed for mortgage payment

US/MSA	Cost of Housing Index (CHI)	Low- Income CHI	Median Home Price (000's \$)	Median Family Income (000's \$)
NEW HOMES				
United States	38%	75%	420.4	97.8
EXISTING HOMES				
United States	38%	75%	418.7	97.8
Ogden-Clearfield, UT	37%	74%	494.3	110.4

* Low-income is defined as 50% of area's Median Family Income.

Source: NAHB/Wells Fargo Cost of Housing Index (Q3 2024), (2024, November 8), <https://www.nahb.org/news-and-economics/housing-economics/indices/cost-of-housing-index>

Table 7: Utah's Housing Shortage, 2010-2024(f)

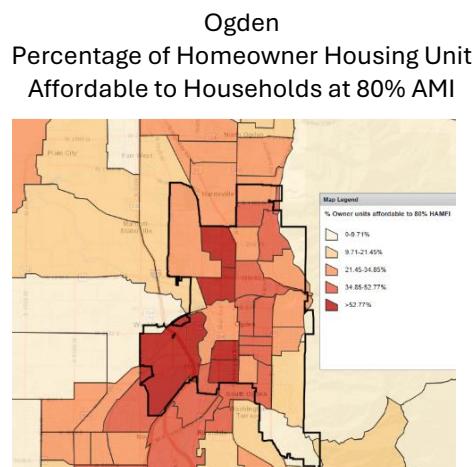
Year	Increase in Housing Units	Increase in Households	Cumulative Shortage
2010	9,079	24,460	
2011	9,085	22,615	28,911
2012	11,918	20,998	37,991
2013	15,009	17,631	40,613
2014	18,810	20,210	42,013
2015	17,294	24,151	48,870
2016	20,064	24,426	53,232
2017	23,002	26,000	56,230
2018	24,245	23,139	55,124
2019	27,610	24,461	51,975
2020	31,797	24,312	44,490
2021	40,144	26,689	31,035
2022	29,529	26,909	28,415
2023 (f)	22,750	27,349	33,014
2024 (f)	23,500	27,741	37,255

(f) = forecast

Source: Kem C. Gardner Policy Institute

Source: The Utah Housing Affordability Dashboard, (2024, November 4), Kem C Gardner Policy Institute, The University of Utah, <https://gardner.utah.edu/affordable-housing-dashboard/>

HUD provides maps to help understand the extent of a community's housing affordability for homeownership. Map #2 provided by HUD, maps by census tract the percentage of homeowner units that are affordable to households with an income at 80% Area Median Income (AMI). Census Tract 2020 has zero housing units affordable to households at 80% AMI and Census Tract 2015 has less than 10% housing units affordable to households at 80% AMI. Eight census tracts, census Tracts 2001, 2002, 2013, 2014, 2015, 2017 and 2020 have between 9.71% and 21.45% affordable housing units for households at 80% AMI. Five Census Tracts have the most affordable housing units, with over 52% of the housing units affordable to households at 80% AMI.



Source: CPD Maps, (2024, November 1), data source ACS LMI Summary Data 5-Yr 2016-2020 <https://egis.hud.gov/cpdmaps/>

When evaluating housing affordability, it's essential to consider Utah's housing shortage. An exacerbating factor in housing affordability is the shortage of housing units. An increase in the number of households moving to Utah exceeds the number of housing units available.

Although in 2021 and 2022 the trend began to reverse, with the number of new housing units exceeding the number of new households moving to Utah, the cumulative shortage remained above 28,000 in 2022 and the trend is expected to continue.

The map provides an illustration of housing affordability in Ogden. In Weber County, the area outside the Ogden city outline, show little affordable housing options. Ogden has more affordable housing than other Weber County cities. However, the amount of affordable housing falls far short of the need.

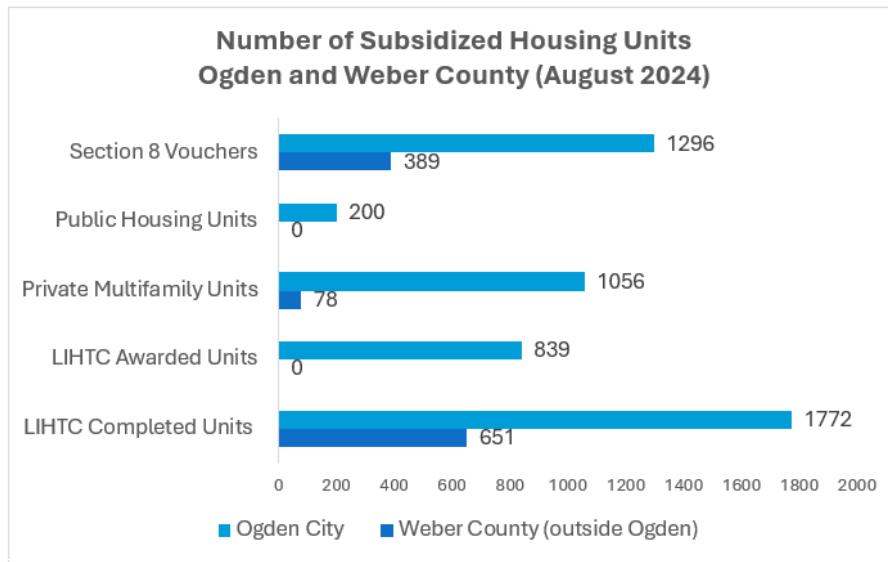
Housing shortages lead to intense competition for the housing units available, which can create bidding wars that ultimately make housing unaffordable. It is estimated that there is an overall shortage of over 30,000 housing units in Utah. As supply and demand take effect, sellers can demand higher prices due to the lack of available housing units. Buyers wanting to live in the area have few options, and may need to compromise in location, size and condition of housing. A housing shortage leads to home price increases.

HOUSING AFFORDABILITY SUMMARY

Utah's population growth and job growth has placed pressure on the housing market. Utah housing prices have doubled since 2016 and incomes are not keeping up. In 2022, it was estimated that 21.2% of Ogden's single-family housing units were affordable to households at 80% Area Median Income (AMI). In the Ogden-Clearfield area the Cost of Housing Index is 37%, which estimates that a typical Ogden family would need to allocate 37% of household income to make a mortgage payment on a median-priced home. Further demonstrating the shortage of affordable housing units in Ogden, HUD data shows that of Ogden's 23 census tracts 18 have less than 50% of homeownership housing units affordable to households at 80% AMI.

SUBSIDIZED HOUSING

Over eighty-two percent of Weber County's rent-assisted households, of which nearly 77% percent are Section 8 public housing voucher holders, live in Ogden. Seventy-three percent of all Weber County tax credit units and 100% of all public housing units are in Ogden. Of the seventeen cities or towns in Weber County (Ogden, Roy, North Ogden, West Haven, Farr West, Huntsville, Riverdale, South Ogden, Plain City, Eden, Pleasant View, Harrisville, Washington Terrace, Marriott-Slaterville, Uintah, Hooper and Liberty) Ogden City is the only community that has more than 5% of the County's share of rent assisted households.



*Data Source: Utah Housing Corporation: Completed Projects, Awarded Projects ; Weber Housing Authority ; HUD Resource Locator, compiled August 2024.

Ten Weber County communities (Farr West, Huntsville, Riverdale, Plain city, Eden, Harrisville, Marriott-Slaterville, Uintah, Hooper and Liberty) have **no** rent-assisted households. Roy and North Ogden have less than 1%, Washington Terrace 1.7%, Pleasant View 3.1% and West Haven 5% the share of Weber County's rent assisted households. Ogden City maintains 84.1% of all rent-assisted public housing households in Weber county. Roy, the second largest city in the county, (population 38,592) with proximity to I-15 and with a large employment base and a Front Runner station has less

one percent of the share of rent-assisted households. The concentration of low-income households in Ogden is a reflection of zoning ordinances and policies of non-entitlement cities in Weber County.

The inventory of federally subsidized rental housing in Ogden includes 1,296 Section 8 Vouchers and 200 public housing units with an additional 2,611 Low Income Tax Credit Housing units (LIHTC). The Low-Income Housing Tax Credit (LIHTC) program was created by the Tax Reform Act of 1986 and gives Utah Housing Corporation budget authority to issue tax credits for the acquisition, rehabilitation, or new construction of rental housing targeted to lower-income households. LIHTC projects must be located in a qualified Census Tracts with 50 percent of households with incomes below 60 percent of the Area Median Gross Income (AMGI) or have a poverty rate of 25 percent or more. Not included in the total of subsidized housing units is the 34 households receiving Tenant Based Rental Assistance with Supportive Services funded by the HOME American Rescue Plan (HOME ARP). Ogden holds a higher share of public assisted housing than any other community in Weber County.

HOUSING AFFORDABILITY SUMMARY

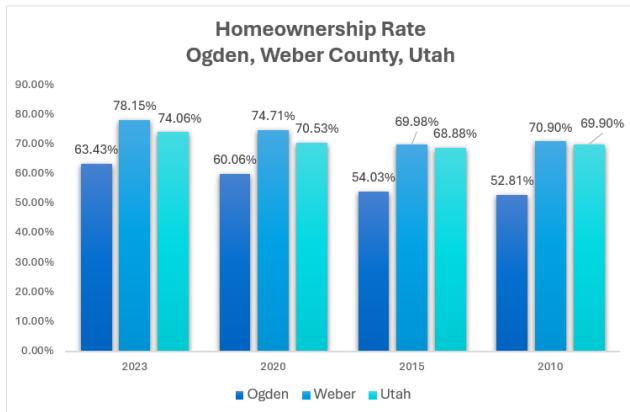
Home prices and rents are rising faster than corresponding incomes. Higher housing costs greatly impact low-to-moderate income households and can lead to housing insecurity. Since 2010, Utah has experienced significant population and job growth. This growth places tremendous pressure on the housing market. Housing affordability is even more challenging for renters than homeowners. In Ogden, many households make insufficient income to purchase a home but are also priced out of being able to afford to rent an apartment.

Although Ogden has a higher number of attainable housing units (units priced below \$400,000) than neighboring city, the housing shortage has pushed prices up even for modest housing units. When there is a shortage of housing units available, to maintain housing affordability, households that have a higher income may purchase homes that are in a lower price range, due to affordability and or location, further depleting the supply of affordable housing for lower-income households. Ogden's poverty rate (12.7%) is over four percent higher than Weber County's poverty rate (8.5%). The data demonstrates that there is a lack of homes affordable to low to moderate income households, which has increased the number of Ogden households, both rental and homeowner.

HOMEOWNERSHIP

Everyone should have the opportunity to purchase a home, which can protect them from rising rents, promote social ties, can build wealth and encourage neighborhood stability. "Homeownership is the single largest source of wealth creation for Americans and has traditionally been an especially important wealth-building strategy for people of color"⁴. As household incomes rise, rates of homeownership increase as well .

⁴Source: Economic equity: Homeownership. The Greenlining Institute. (2022, August 9). Retrieved October 3, 2022, from <http://greenlining.org/issues-impact/economic-equity/homeownership/>



In comparison to Weber County and Utah State, Ogden City falls behind in homeownership rate. Although the City has a lower homeownership rate than Weber County and Utah State, since 2013, Ogden City's homeownership rate increased by 10.62%, greater than Weber County that had a 7.25% and Utah 4.15% homeownership rate increase. In Ogden, the population has increased, the minority population has increased, and the homeownership rate has increased.

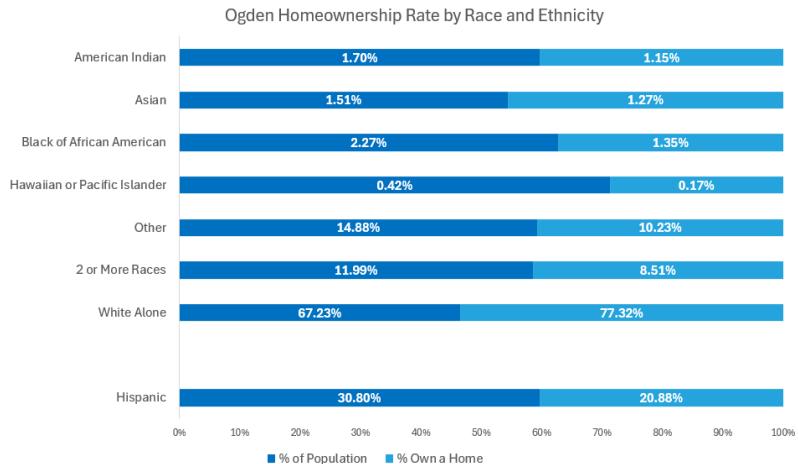
Minorities have made progress in homeownership in recent years. But even with these gains, the homeownership rate among minorities still lags significantly behind whites. In 2015, fewer than half of African American and Hispanic households owned their homes. In contrast, 71 percent of non-Hispanic whites were homeowners⁵.

Homeownership allows households to accumulate wealth and social status, and promotes positive social, economic, family and civic outcomes. Even after considering the effect of the recent housing downturn, many studies found that homeownership still provides a variety of social benefits. Homeownership boosts the educational performance of children, induces higher participation in civic and volunteering activity, improves health care outcomes, lowers crime rates and lessens welfare dependency⁵.

Key Highlights⁵

- Homeownership in US significantly increased over the last decade, adding 10.5 million more homeowners.
- The US Hispanic American homeownership rate rose to a record high of 51.5% in 2022.
- In the past decade Asian Americans experienced the sharpest increase in homeownership rate, reaching 63.3% - a gain of 6.1% - a record high.
- While homeownership rates improved across all racial and ethnic groups over the past decade, the home-ownership rate among Black households continue to trail at 44.1%.

⁵ Source: National Association of Realtors, (December 2, 2024), Racial Minority Groups Increased Their Homeownership Rates While Still Facing Significant Homebuying challenges. <https://www.nar.realtor/newsroom/racial-minority-groups-increased-their-homeownership-rates-while-still-facing-significant-homebuying-challenges>



In review of the homeownership rate by race and ethnicity, the White population has the highest homeownership rate. Over sixty-seven percent (67.23%) of Ogden residents are White. Seventy-seven percent of the white population own a home. The Hawaiian or Pacific Islander population is the smallest tracked racial category in Ogden and has the lowest homeownership rate at .17%.

Ogden City Homeownership Share by Race and Ethnicity			
Race / Ethnicity	2017	2023	Change
American Indian	0.76%	1.15%	0.38%
Asian	1.37%	1.27%	-0.10%
Black or African American	1.34%	1.35%	0.01%
Native Hawaiian or Alaskan	NA	0.17%	0.17%
Other	1.34%	10.23%	8.88%
2 or more Races	NA	8.51%	8.51%
White Alone	78.43%	77.32%	-1.12%
Hispanic or Latino	16.77%	20.88%	4.11%

Source: US Census Bureau Decennial Demographic and Housing Characteristics; (2024, November 7),
<https://data.census.gov/table/DECENNIALDHC2020.H10?t=Housing%20Units&g=160XX00US4955980&d=DEC%20Demographic%20and%20Housing%20Characteristics>

Homeownership Share by Race and Ethnicity data from 2017 compared to 2023 shows the trend over the past six years. The US Census category, Other, shows an 8.88% increase, the most significant increase in homeownership by any race or ethnic group. The White Alone category had the most significant decline of all racial groups, with a -1.12% decline in homeownership rate. Nationwide the Asian population has seen the most significant increase in homeownership rate. Contrary to the nationwide trend, in Ogden, the Asian population demonstrated a decline of -0.10% percent in homeownership in the past six years, in Ogden. The category 2 or more Races was not previously included in the 2017 US Census tracking, so a complete picture of the data is not available. Although the White population had a decline of -1.12% in homeownership rate, Whites have a significantly higher share of homeownership than all minority categories.

HOMEOWNERSHIP SUMMARY

Although behind Weber County and Utah homeownership estimates, Ogden has had a steady increase in homeownership rate since 2010. The significant increases in the cost of housing, the strong economic growth and housing shortages (more people moving to Ogden and fewer affordable

housing units available) taking place in Ogden and the region continues to exacerbate many of the issues facing low to moderate income households. Although many households are priced out of homeownership, the rate of homeownership has increased, which confirms the data that more households are experiencing housing cost burden.

SECTION IV. DATA REVIEW AND ANALYSIS

UTAH HEALTHY PLACES INDEX

The Utah Healthy Places Index (HPI) is an evidence-based and peer-reviewed data tool that can help support efforts to prioritize equitable community investments and develop programs and policies for HUD funded programs. Utah HPI maps data on social conditions at a city level or by city, county or census tract. Using key indicators, HPI, scores communities, comparing the selected area to other areas in Utah. The Utah HPI tool evaluates the relationship between 22 identified key drivers of health and life expectancy at birth—which can vary dramatically by neighborhood. Based on that analysis, HPI produces a score ranking from 1 to 99 that shows the relative impact of conditions in a selected area compared to all other such places in the state. The Utah HPI compares geographies across the state with the ability to view neighborhood-by-neighborhood data to provide a granular view of community well-being. The Utah HPI also lists policy recommendations to offer guidance on where resources may be directed to create the most impact⁶.

POLICY ACTION ITEM	INDICATORS
Transportation	Automobile access, Bike Lane Access, Traffic Volume
Clean Environment	Diesel PM, Ozone, PM 2.5
Neighborhood	Park Access, Tree Canopy
Social	Census Self-Response rate, Voting
Healthcare Access	Insured Adults
Housing	Homeownership, Housing Stability, Low-Income Homeowners and renters, Severe Housing Cost Burden, Overcrowding
Education	Bachelor's Education or Higher, High School Enrollment, Preschool Enrollment

UTAH HEALTHY PLACES INDEX KEY TAKEAWAYS

The HPI rates Ogden City as a community that is 4.2% healthier than other Utah communities, See Figure 1. Or, in other words, Ogden city ranks less healthy than 95.8% of Utah communities. For Ogden city, six Policy Action Areas ranked below 25 percentiles (Transportation, Clean Environment, Economic, Social, Healthcare access, and Housing). The lowest ranking of all indicators is Transportation, suggesting the need for policies and initiatives that provide more transportation options for Ogden residents. The next lowest ranking Policy Action Area is Social with a 4.9% rating. Ogden's population ranked low in participation of census data responses and voting. Healthcare Access ranked at 14% for the number of insured adults in Ogden compared to other communities in Utah. Policy Action Areas with the lowest ratings for Ogden City are Transportation, Social and Housing. Followed by Healthcare Access, Economic and Clean Environment, which all rated below 25 percentiles.

⁶ Source: Utah Department of Health & Human Services, (2024, November 7), Utah Healthy Places Index: <https://map.utah.healthyplacesindex.org/>

Figure 1: Utah Healthy Places Index for Ogden City



UTAH HPI AND THE NRSA

The Utah HPI rates specific health and environmental factors and includes key indicators of diversity and equity to consider how minority populations may be impacted. In 2010, HUD approved a Neighborhood Revitalization Strategy Area (NRSA) for Ogden City. The NRSA was amended in 2021 to include Census Tract 2018 a R/ECAP. The NRSA was developed to target resources to a distressed community, Ogden's East Central. Together the NRSA Census Tracts 2008, 2009, 2011, 2012, 2013.01, 2013.2 and 2018 have a Utah Healthy Places Index of 2.6. In other words, 97.4% of other Utah communities rank healthier in the HPI than Ogden City's NRSA.

The Utah HPI also provides a Race/Ethnicity Diversity Index, which measures how racially and ethnically diverse the community is. The NRSA's diversity index is 86.8%, which estimates "Probability that two people in this geography, chosen at random, will be of different race/ethnicities." (Gini-Simpson Diversity Index). HPI data indicates that the NRSA population has a high minority population and has an extremely low Utah HPI rating. The NRSA is an ethnically and racially diverse community with health and environmental issues that impact residents' health and well-being.

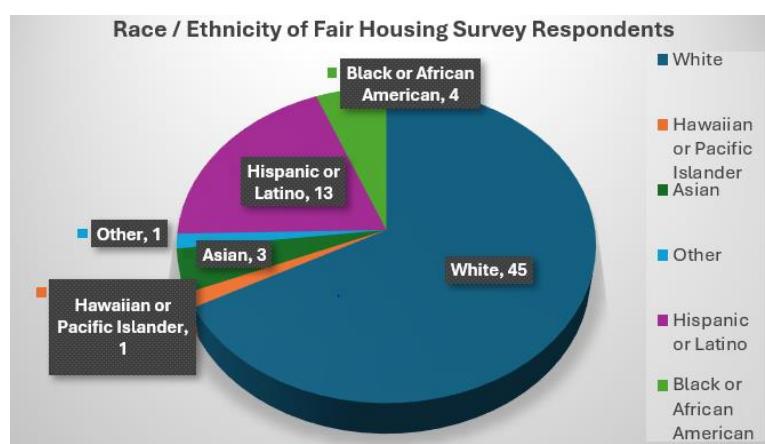
UTAH HEALTHY PLACES INDEX SUMMARY

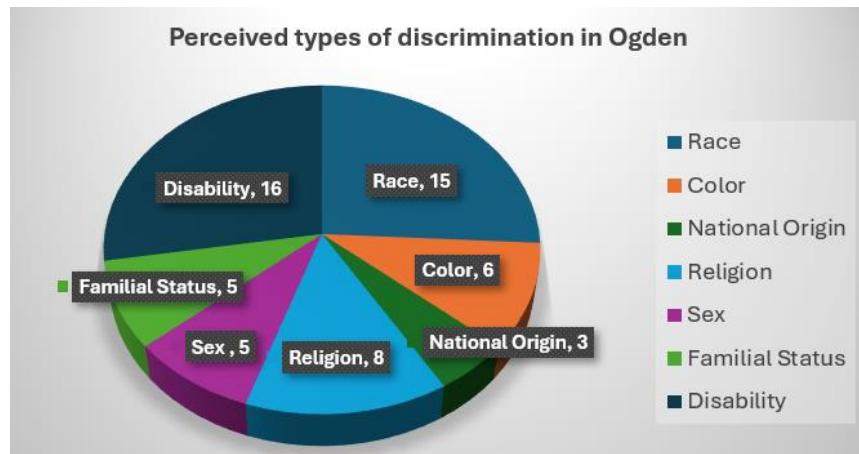
The HPI's goal is to help identify areas where the community faces health and environmental issues and to prioritize equitable investments that will make a difference. In conclusion, all metrics measured by the Utah Healthy Places Index indicate that initiatives in all HPI areas would benefit Ogden residents. The AI will utilize the policy recommendations in identifying impediments to Fair Housing choice and actions items to address the impediments.

OGDEN CITY'S FAIR HOUSING SURVEY

The City initiated a Fair Housing Survey in June 2024. Members of the community were encouraged to take the survey. Postcards with a QR code directed participants to the online survey were distributed to organizations such as the Community Engagement and Opportunity Commission, City Council, and Ogden City's Community and Economic Development Department's Citizen Advisory Committee (CAC) and members of the community. Outreach included attending community events and encouraging the public to take the survey and providing Fair Housing information and Survey postcards. Event outreach included: Farmer's Market, Ben Lomond H.S. Family Night, Plan Ogden event, National Night Out, Interfaith Works group, Second Baptist Church homebuyer event.

Ogden's Fair Housing Survey questions and responses:





When has housing discrimination been experienced:

1. Finding an apartment (10)
2. Finding a home to buy (5)
3. Obtaining a reasonable accommodation (2)
4. Obtaining a mortgage (1)
5. Other (1)

41 respondents reported no housing discrimination experiences.

In the case of housing discrimination, was the housing discrimination reported?



19 Responses

Fair Housing challenges experienced by respondents:

1. I am afraid of being evicted or have been evicted (19)
2. Asked: "What ward or church do you attend?" and then changes to rental terms or denies reasonable request (14)
3. Landlord refuses to allow emotional support animal (11)
4. Landlord refuses reasonable accommodations (10)
5. Apartment manager met me in person then denied or changed rental terms (9)
6. Realtors steering me away from where I want to live (8)

Pick the three (3) most critical priority needs for Fair Housing / Affordable Housing in Ogden.

1. Improve the Fair Housing complaint process and access to Fair Housing information (24)
2. A variety of housing options to increase housing diversity (24)
3. Preserve the city's housing stock to promote naturally occurring affordable housing (23)
4. Build small homes (16)
5. Housing not near my job or public transportation (15)
6. Advocates who can speak on behalf of renters to landlords (13)
7. Help people with home repairs (12)

FAIR HOUSING SURVEY – SUMMARY

All demographic categories except Native American Indian / Alaskan Native were represented in the survey. The following summary, though not exhaustive, highlights the top responses from Fair Housing Survey takers. Respondents selected Disability as the most common basis for types of discrimination reported in Ogden followed by Race and Religion. Affordable housing is the top ranked fair housing need. Improving the Fair Housing complaint process and access to fair housing information ranked as top fair housing issues. Housing discrimination was experienced more often when renting an apartment. Respondents selected evictions, discrimination based on religion and advocates who can speak on behalf of renters to landlords were the top ranked Fair Housing challenges. Of the 67 respondents, 19 reported experiencing housing discrimination and of the 19, only 3 reported the discrimination. Due to lack of knowledge or resources, instances of discrimination are often under-reported. The data reflects a disconnect with residents not knowing where or how to file a complaint and understanding how reporting discrimination can further protect one's rights. This gap may provide context for the city to reorganize its fair housing education efforts to ensure households, landlords, real estate professional understand fair housing rights. Although Ogden's Fair Housing survey is a small sample size, it provides a basis for understanding the Fair Housing concerns of citizens.

FAIR HOUSING COMPLAINTS DATA

The National Fair Housing Alliance's (NFHA) 2024 Fair Housing Trend Report highlights Nationwide fair housing complaint data. Nationwide, there were 34,150 fair housing complaints received in 2023, compared to 33,007 in 2022. Discrimination based on disability accounted for the majority (52.61 percent) of all complaints filed. There were 1,521 complaints of harassment reported last year, an increase of 66.23 percent from 2022. 824 complaints were based on color reported last year; this represents a yearly increase of 35.30 percent. The largest increases in complaints was based on color and originated from rental complaints (386 in 2023) and harassment complaints (97 in 2023) nationwide. The 2023 data reveals a record-setting number of fair housing complaints, with 34,150 fair housing complaints nationwide⁷.

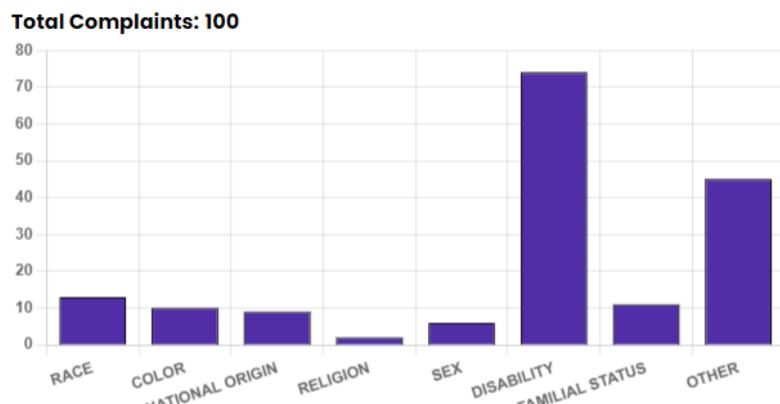
It's important to note that Fair Housing advocates estimate that most incidents of unlawful housing discrimination go undetected or unreported because fair housing discrimination is difficult to identify and document. Types of commonly unreported housing discrimination may include a person

⁷ Source: National Fair Housing Alliance, (2024, November 21), 20224 Fair Housing Trends Report published July 10, 2024, https://nationalfairhousing.org/wp-content/uploads/2023/04/2024-Fair-Housing-Trends-Report-FINAL_07.2024.pdf

of color being told a housing unit is not available when in fact it is or a lender offering higher interest rates to minority households that qualify for lower interest rates or an appraiser undervaluing a property in a prominently high minority neighborhood. These types of discrimination are not overt and are often challenging or impossible to prove and may go unnoticed.

UTAH FAIR HOUSING COMPLAINTS DATA

Utah 2023 Fair Housing Complaints



Source: National Fair Housing Alliance, [2024 Fair Housing Trends Report](https://nationalfairhousing.org/resource/2024-fair-housing-trends-report/).
<https://nationalfairhousing.org/resource/2024-fair-housing-trends-report/>

Everyone experiencing fair housing discrimination has the option to file a complaint directly with HUD or through a HUD advocacy partner agency such as Utah Antidiscrimination and Labor Division (UALD) or the Disability Law Center (DLC). Both the UALD and DLC receiving funding from HUD and are empowered by HUD to assist people who believe they are victims of fair housing discrimination, conduct investigations or claims, test in communities and educate the public.



Fair Housing Complaints Filed in Ogden - 2023 and 2024

Basis of Complaint	# of Complaints
Color	1
Disability - mental	4
Disability - mental & physical	2
Race – Black	1
Familial Status	2
Retaliation	2
TOTAL	12

50% of FH Complaints
filed by Ogden residents
were based on disability

Source: GRAMA Request, Utah Antidiscrimination and Labor Division,
Fair Housing Complaints filed by Ogden residents 2023 and 2024, (14,
November 2024)

The Utah Antidiscrimination and Labor Division reported that 12 Fair Housing discrimination complaints were filed over the past two years. Fifty percent of these complaints were based on disability. Disability leads to all categories in perceived reason or basis for the complaint followed by familial status and retaliation.

FAIR HOUSING COMPLAINTS DATA SUMMARY

One hundred Fair Housing complaints were filed by Ogden residents in 2023, data was available for those filed with the Utah Antidiscrimination and Labor Division. At the national, state and city level, disability consistently is reported as the most common basis for fair housing discrimination. More than one half of all complaints filed are based on disability. This data raise concerns that discrimination is impeding fair housing choice for households with disabled individuals.

EVICTION

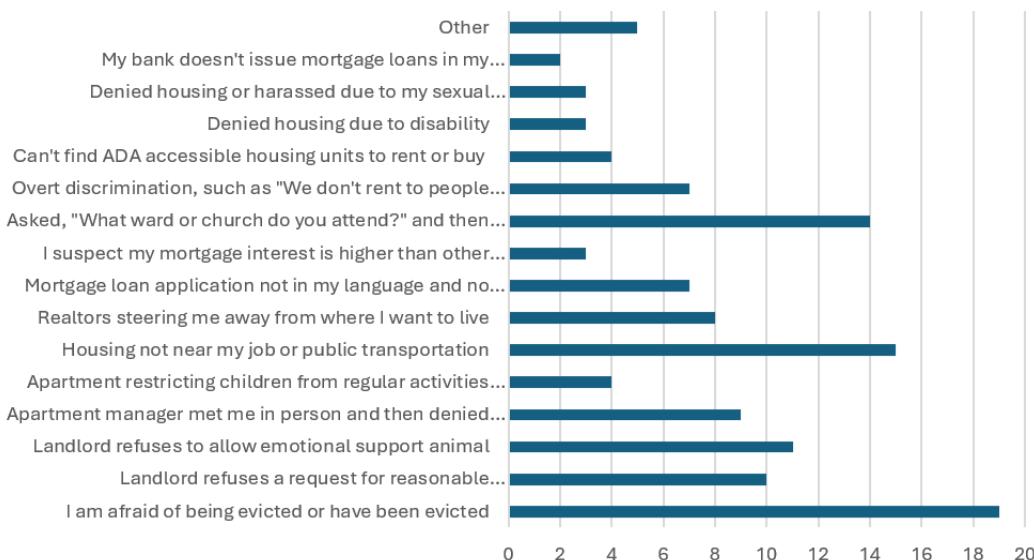
Evictions have serious consequences, often sending families to shelters, homelessness, or over-crowded situations with friends or family, as well as disrupting school attendance for children. The most vulnerable are low-income families with children. The presence of children nationally triples the rate of people experiencing eviction. Out of Reach data demonstrates that Ogden lacks enough affordable housing for renters. In Ogden, rents have increased faster than wages, creating an even greater shortage of affordable housing, particularly for low-income households. This leads to a common underlying cause of eviction, increases in rents, and wages don't keep up, resulting in renters' nonpayment of rent.

Ogden Fair Housing Survey Data – Eviction

Ogden residents were asked to participate in a Fair Housing Survey. Question #8 in the survey asked respondents to select from a list of 16 housing-related challenges that they experienced or someone they know experienced. The most reported challenge is "I am afraid of being evicted or have been evicted."

Ogden Fair Housing Survey Results – Question #8

Have you or someone you know faced any of the following housing-related challenges?



Fair Housing survey respondents rated “I am afraid of being evicted or have been evicted” the top housing challenge in Ogden.

OGDEN DISTRICT COURT DATA – EVICTION

Ogden District Court Eviction Data

Year	# Evictions Filed	# Eviction and/or judgement Successful
2019	839	574
2020	540	339
2021	604	345
2022	694	445
2023	920	636
2024*	609	365

Source: GRAMA Request, Clerk of Court for Weber Morgan Counties, Eviction Report for Weber County 10/8/24

*2024 data is for part of the year. Data is through August 2024

OGDEN FAIR HOUSING SURVEY AND OGDEN DISTRICT COURT DATA SUMMARY

The housing-related challenge most identified by Ogden residents that took the Fair Housing Survey is eviction related. In concurrence with the Fair Housing Survey results, current data from Ogden District Court reports an annual increase in the number of evictions in Ogden since 2020 and the eviction moratorium was lifted. Utah District Courts are not required to track and report the race and ethnicity and sex of defendants in an eviction filing and is limited to the number of filings and the status of the filing, making it difficult to get a clear picture of the extent of minorities experiencing eviction.

EVICTION DISPARITIES

The Eviction Lab webpage reports: “There are often large racial/ethnic and gender disparities in the threat of eviction—for example, over the last year, 58% of people facing eviction were women, a count that is disproportionately made up of more Black and Latinx women... Filing and eviction rates were, on average, significantly higher for Black renters than for white renters.⁸”

HUD Eviction Grant Program

To address the nation-wide increase in evictions, in 2021 and 2022, HUD funded an Eviction Protection Grant, which assisted low-income tenants facing eviction with legal services.

HUD reported: “There is strong evidence, however, that landlords do not pursue evictions equally across households. Black and Hispanic women, as well as families with children, are disproportionately affected by eviction—and the long-term consequences are significant.”

⁸ Source: Eviction Lab, (14 November, 2024), Eviction Defendant Demographics, <https://evictionlab.org/eviction-tracking/>

As of March 31, 2024, HUD Eviction Protection Grantees have provided legal assistance to over 35,000 households through the program... The majority of tenants served are people of color and nearly half are from Black households. All tenants served by the program are low-income, and nearly 2 in 3 tenants served have extremely low incomes.⁹

HUD's Eviction Protection Grant Program data and the Eviction Lab data consistently report that minorities are disproportionately at risk of eviction. Since 2018, The Eviction Lab, a leading source of eviction data for the U.S., has not tracked eviction data for Utah, Weber County or Ogden. Yet, there is strong evidence from nation-wide data that renters of the protected classes are at greater risk of eviction.

EVICTION DATA SUMMARY

Utah Rent Relief program, which provided emergency rental assistance during the COVID-19 pandemic, closed to new applicants February 5, 2023. Without assistance to help renters facing eviction, households may experience greater housing instability.

Current data from Ogden District Court shows, since the end of the eviction moratorium in 2020, an annual increase in the number of evictions in Ogden. Eviction data is limited and less than adequate to provide a complete picture of the eviction problem in Ogden. The available data does not provide the information needed to determine if there is a disparate impact on the number of evictions in Ogden. Although quantifiable data is not available to identify the extent of minorities and women experiencing evictions, the City has reviewed nation-wide data to identify evictions as a Fair Housing impediment and will partner with community-based organizations to assist eligible households facing housing instability and eviction.

HOUSING APPRAISAL DATA

In 2021, U.S. Department of Federal Housing and Finance Agency (FHFA) commissioned a federal Interagency Task Force to examine home Property Appraisal practices nationwide. The Property and Valuation Equity (PAVE) task force was established to develop approaches to identify and eliminate racial and ethnic bias in home valuations. In October 2022, U.S. Department of Federal Housing and Finance Agency (FHFA) released the first public aggregated data statistics on appraisals, called the Uniform Appraisal Dataset (UAD). This data is used to monitor industry trends and compare appraisal gaps in minority neighborhoods.

“The FHFA aggregate data statistics data can help identify disparities particularly between white, black and Latino communities in respect to home valuation. The FHFA blog [“Have Racial and Ethnic Valuation Gaps in Home Purchases Narrowed?”](#) posted that in several states [including Utah] minority tracts continued to have a higher percentage of low appraisals as compared to white tracts but the gap narrowed substantially.” The FHFA Blog further stated, “In conclusion, UAD Aggregate Statistics data show a reduced appraisal gap in the period following the release of the PAVE Action Plan. More analysis is needed to determine whether this is a causal relationship, but it nonetheless represents an encouraging trend as public and private stakeholders continue their efforts to eliminate appraisal bias.”¹⁰ (See Figure 2).

⁹ Source: The Eviction Protection Grant Program (EPGP, H. (n.d.). HUD User Exchange <https://www.huduser.gov/portal/eviction-protection-grant.html#overview>

¹⁰ Source: Vajja, A. (2023, August 8). Have Racial and Ethnic Valuation Gaps in Home Purchase Narrowed? *Federal Housing Finance Agency*. September 9, 2024, <https://www.fhfa.gov/blog/statistics/have-racial-and-ethnic-valuation-gaps-in-home-purchase-narrowed>

APPRAISAL GAP

A housing appraisal valuation can be at, above, or below contract price based on the appraiser's opinion of value for the property. However, unlike appraisals that are at or above the contract price, low appraisals can delay or cancel the closing of the sale. For instance, a buyer can back out of the contract if the purchase agreement has an appraisal clause. A low appraisal may limit the amount a lender is willing to finance, which may require the seller and/or the buyer to cover the shortfall. The seller may have to cover at least part of the shortfall through reducing the contract price. Thus, a low appraisal can reduce the equity gain on the property for the seller." (Vajja)

Figure 2: Appraisal Gap Compared to White Majority Tracts Before PAVE Initiative and After PAVE Action Plan Release, by State

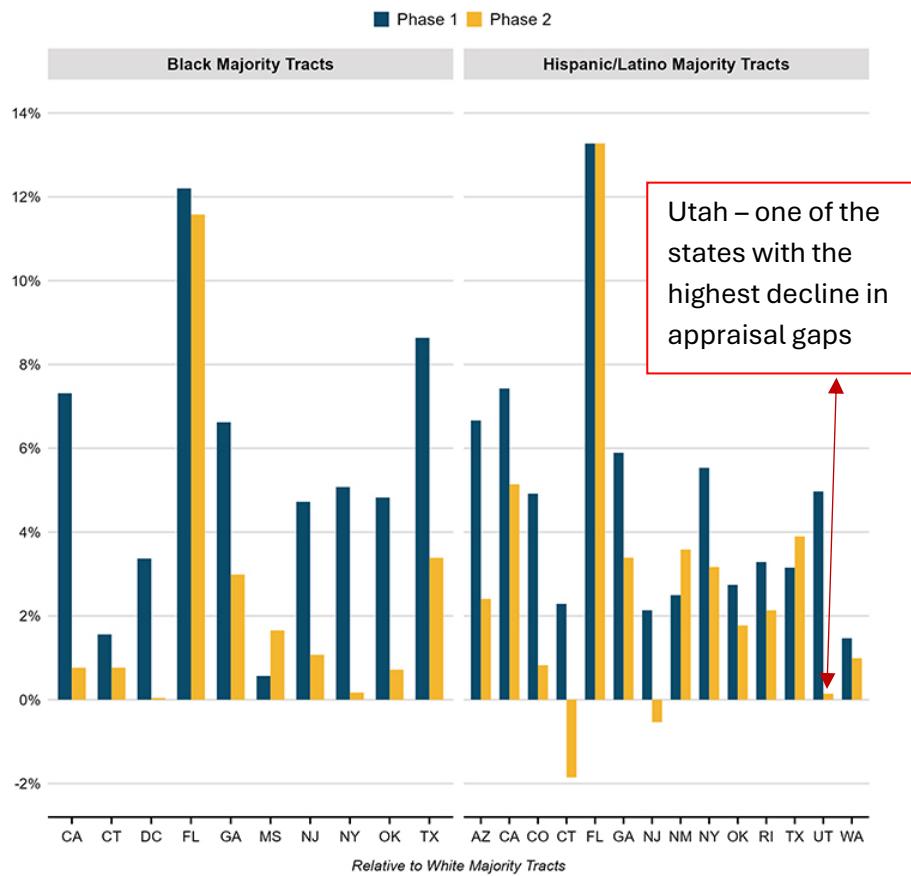
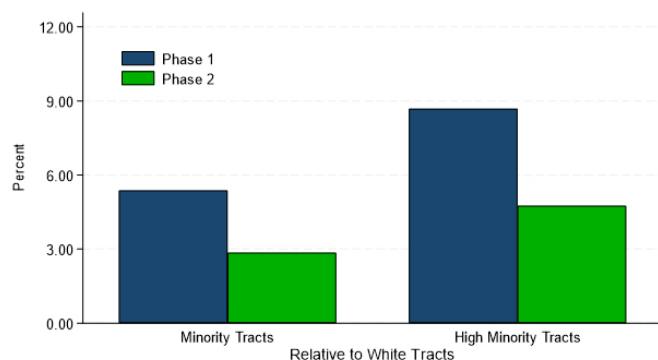


Figure 2: Appraisal Gap Compared to White Majority Tracts before PAVE Initiative and After PAVE Action Plan Release, by State. <https://www.fhfa.gov/blog/statistics/have-property-valuation-inequalities-diminished-in-black-and-hispanic-latino-neighborhoods>

Figure 3: Appraisal Gap



Source: Figure 3: FHA Statistics Blog. (2024, April 12). Have Property Valuation Inequalities Diminished in Black and Hispanic/Latino Neighborhoods? *FHA Statistics*. August 3, 2024, <https://www.fha.gov/blog/statistics/have-property-valuation-inequalities-diminished-in-black-and-hispaniclatino-neighborhoods>

APPRAISAL GAP SUMMARY

As Figure 3 illustrates, at the start of the UAD reporting requirements, nationwide appraisal gaps were determined to be nearly 6% higher for minority census tracts and nearly 9% higher for high minority census tracts compared to white census tracts. At Phase 2, one year after the UAD reporting requirements, the appraisal gaps in minority census tracts dropped to below 3% and approximately 5.5% for high minority Census Tract compared to white census tracts. Although a significant drop in appraisal gaps is reported, there is concern that appraisal gaps continue to be higher in minority and high minority census tracts. In review of the PAVE data, Utah was one of the most improved states; appraisals state-wide nearly match contract price. The data reveals a positive trend. The City will continue to monitor the UAD data.

MORTGAGE LENDING DATA – OGDEN-CLEARFIELD DISPOSITION OF MORTGAGE APPLICATIONS

Disparities in homeownership across racial and ethnic categories may reflect symptoms of underlying impediments in the home mortgage application process. Homeownership and housing stability is one dimension of housing opportunity that can be assessed by using Home Mortgage Disclosure Act (HMDA) data to examine mortgage loan application outcomes. To better understand the success rate of each minority category compared to whites in obtaining mortgage loans, the 2023 HMDA data was compiled and analyzed for Ogden City.

In 2023, a total of 27,913 people applied for home mortgage loans with a success rate of 65%. Native Hawaiian and Other Pacific Islanders experienced the lowest success rate, 47%, in obtaining a mortgage. White alone mortgage applicants had a success rate was 68.52% more than 10% higher than the city's minority population's success rate in obtaining a mortgage is 58.44%,

2023 Ogden Home Mortgage Lending Success rate by Race and Ethnicity			
Race of Applicants	Applications Received	Loans Originated	Success Rate
American Indian or Alaska Native	206	109	53%
Asian	478	287	60%
Black or African American	259	147	57%
Native Hawaiian or Other Pacific Islander	177	84	47%
White	23,746	15,958	67%
2 or more minority races	33	20	61%
Race Not Available	3,413	1,938	57%
TOTAL	28,312	18,543	65%

Ethnicity of Applicants	Applications Received	Loans Originated	Success Rate
Hispanic or Latino	2,830	1,570	55%
Not Hispanic or Latino	21,968	14,888	68%
Ethnicity Not Available	3,514	2,085	59%
TOTAL	28,312	18,543	65%

Ogden 2023
HMDA Data compared to minority US Census Population data

Race / Ethnicity Category	# Applicants	% Applicants by Race	% of Population	Difference
American Indian or Alaskan Native	206	0.73%	1.70%	-0.97%
Asian	478	1.69%	1.51%	0.18%
Black or African American	259	0.91%	2.27%	-1.36%
Native Hawaiian or Other Pacific Islander	177	0.63%	0.42%	0.21%
White	23,746	83.87%	67.23%	16.64%
2 or more races	33	0.12%	26.87%	-26.75%
Race not available	3,413	12.05%	NA	NA
TOTALS	28,312			

Source: FFIEC Home Mortgage Disclosure Act, MSA/MD Aggregate Reports, Disposition of loan applications, by location of property and type of loan, Ogden-Clearfield, 2023, <https://ffiec.cfpb.gov/data-publication/aggregate-reports/2023/UT/36260>

The 2 or More Races category data had a significantly high discrepancy. Discrepancies have appeared since the US Census data gathering changed in 2020. “It is important to note that these data comparisons between the 2020 Census and the 2010 Census race data should be made with caution, taking into account the improvements we have made to the Hispanic origin and race questions and the ways we code what people tell us... The 2020 Census data shows the U.S. “Two or more races” population at 33.8 million – up from 9 million in 2010, a 276% increase.¹¹”

¹¹ Source: U.S. Census Bureau. (2023, June 7). Multiracial Heritage Week: June 7-14, 2023. Newsroom Stories. Retrieved October 10, 2024 from <https://www.census.gov/newsroom/stories/multiracial-heritage-week.html>

HMDA data retrieved did not provide reasons for denial of a home mortgage. As was reported in the previous AI, the most common reasons for Hispanic applicants to be denied a mortgage are poor credit, lack of credit history and not completing the loan application process.

MORTGAGE LENDING DATA SUMMARY

A comparison of the percentage of mortgage applications by race / ethnicity compared to the percentage of population for that race / ethnicity, reveals some minority populations are less likely to apply for a home mortgage than other populations. Two or More Race category, Black or African Americans, and American Indian or Alaskan Natives were less likely to apply for a home mortgage and least likely to be successful in obtaining a mortgage. The data reveals certain minority groups are less likely to apply for a home mortgage and less likely to be successful in obtaining a home mortgage compared to whites, which is a signal of potential racial and ethnic bias in home mortgage lending.

SECTION V. PUBLIC PROGRAMS AND BENEFICIARY DATA

Ogden City has taken a proactive role and implemented public policies that encourage affordable housing opportunities through the city's housing programs. Ogden is working to create healthy neighborhoods throughout the city. Healthy neighborhoods have quality housing, are safe, are economically sustainable, have access to transportation, and provide opportunities for meaningful social and community involvement. Policies targeted at facilitating affordable housing and the accommodation of higher density housing in strategic locations to meet local housing needs and to comply with the State's housing requirements. Ogden strives to provide opportunities for housing that are balanced among housing types, locations, and affordability levels. Ogden continues to guide the development of new multiple-family housing in appropriate areas, in mixed-use zones, and in multiple-family residential zones. At the same time, Ogden is seeking ways to provide more opportunities for single-family and ownership housing. The city is actively engaging the public in Plan Ogden, a community-driven initiative that will create a General Plan to guide a vision of the city moving forward.

Ogden has zoning regulations and other development practices that are very favorable toward the construction of new housing. Ogden is re-examining whether apartments in commercial zones facilitate healthy neighborhoods. Since these commercial zones were designed for retail and business uses and not housing, many lack close access to parks, schools, safe biking and walking paths, and neighborhood amenities. Ogden will be seeking input on a new General Plan that includes zoning updates through upcoming public hearings and meetings prior to adoption. This objective is supported, in part, through the creation of two new land use designations (Center Mixed Use and Corridor Mixed Use) and increases in permitted residential densities. The existing housing stock is predominantly single-family detached residential units, which accounts for more than 66% of the total units in the city.

OGDEN CITY HUD-FUNDED PROGRAMS

Ogden City utilizes HUD funds to plan and implement projects that foster revitalization of eligible communities. The primary goal of the program is the development of healthy neighborhoods and viable urban communities. Program objectives include providing decent housing, creating a suitable living environment, and economic assistance to business and job creation /retention projects. Programs are designed to principally assist low- to moderate-income individuals and families. Ogden City receives an annual allocation of CDBG funds from HUD, which is used to fund eligible

housing, public improvements, and economic development projects, meeting the needs of low-to-moderate income individuals and families. HUD funded programs include:

- Down payment assistance
- Preserving Naturally Occurring Affordable Housing
- Emergency Home Repair for low-income homeowners
- New home construction
- Economic Development for job creation
- Microenterprise Assistance
- Public infrastructure improvements
- Tenant Based Rental Assistance with Supportive Services for homeless persons

The City has implemented a Language Assistance Plan to assist persons with limited English proficiency that may require translation. The city compiled a list of foreign speaking city employees that are certified to translate. This list is available to city employees to access translators on a daily basis. Persons requesting assistance or services who do not speak English as their primary language and have limited ability to speak/read/write or understand English are entitled, under Title VI of the Civil Rights Act of 1964, to receive City services, benefits, and/or participate in City sponsored programs. The City's Language Assistance Plan is utilized to improve services to persons with limited English proficient.

Race and Ethnicity of beneficiaries are reported annually in the City's Consolidated Annual Performance and Evaluation Report (CAPER) to HUD. The following table shows the racial/ethnic composition of households or individuals assisted in Ogden City's HUD-funded programs. Approximately 31% of households that utilized the City's HUD-funded programs were Hispanic, the largest ethnic group in the city.

In review of the Ogden City's HUD-funded programs, the city completed projects, providing assistance to 372 program beneficiaries in the last completed five fiscal years, July 1, 2019 – June 30, 2024 (FY20-FY24). Of the 372 program beneficiaries were of the following race/ethnicity: 83.6% White, 31.18% Hispanic, 3.23% Native American, 5.91% Black or African American, 1.34% Hawaiian or Pacific Islander, 1.88% Asian and 4.03% Balance/Other.

Ogden City HUD-Funded Programs' Beneficiary Count by Race and Ethnicity
July 1, 2019 - June 30, 2024

HUD-Funded Program	White	American Indian or Alaskan	Asian	Black or African American	Hawaiian or Pacific Islander	Other	Total	Hispanic or Latino
Own In Ogden, Down Payment Assistance	175	8	4	10	4	9	210	56
Tenant Based Rental Assistance	10	3	0	5	0	0	18	4
Emergency Home Repair Program	21	0	0	2	0	0	23	9
Quality Neighborhoods Housing Rehab	26	1	1	2	0	2	32	7
Infill Housing	15	0	0	0	0	1	16	2
Microenterprise Loan Program	34	0	1	2	0	1	38	30
Small Business Loan Program	27	0	1	1	1	2	32	8
Special Economic Development Projects	3	0	0	0	0	0	3	0
TOTALS	311	12	7	22	5	15	372	116
% of participation by Race and Ethnicity	83.60%	3.23%	1.88%	5.91%	1.34%	4.03%	100%	31.18%

Forty-seven percent of Ogden beneficiaries were of a race or ethnic minority population. Sixteen percent of Ogden City's beneficiaries are of a minority race population and 31.18% are of a minority ethnic population, Hispanic. Fifty-two percent of beneficiaries were of White population.

**Ogden City HUD-Funded Programs Comparison of Race / Ethnicity
by Five Year Count**

	FY16-19	FY20-24	Change
Asian	1.42%	1.88%	0.46%
Balance / Other	3.19%	4.03%	0.84%
Black	1.77%	5.91%	4.14%
Native American or Alaskan	0.71%	3.23%	2.52%
Native Hawaiian or Pacific Islander	0.71%	1.34%	0.63%
White	69.50%	83.60%	14.10%
Hispanic	22.70%	31.18%	8.48%

A comparison of the share of beneficiaries by Race and Ethnicity from the prior five years July 1, 2015 to June 30, 2019 (FY16-19) and the most recently completed five years July 1, 2019 – June 30, 2024 (FY20-FY24) shows an increase in participation by all race and ethnicity groups. Native Hawaiian or Pacific Islanders have the fewest number participating in the city's HUD programs with five, 1.34% of the city's total beneficiaries, in a five year period. The number of beneficiaries is small, but Ogden City's population of Hawaiian or Pacific Islander is estimated at 0.42% of the total population. Followed closely behind is the Asian population with seven participants, 1.88% of beneficiaries, in a five year period. Ogden City's Asian population is estimated at 1.51% of the total population. The most significant increase is in the White population, with a 14.1% increase in the city's HUD-funded programs. Hispanics also had a significant increase in participation with an 8.48% increase in the Hispanic population's participation in the city's HUD programs.

Progress has been made including more minorities in participating in the city's HUD-funded programs. As a recipient of Community Development Block Grant and HOME grant, Ogden City will work to affirmatively furthering fair housing choice. Although Ogden City has made a commitment to provide equitable programs and policies, the participation of minorities in the city's programs could be improved.

SECTION VI. KEY POLICIES AND PROGRAMS

MOST RELEVANT POLICIES AND PROGRAMS THAT SUPPORT THE EXPANSION OF AFFORDABLE AND FAIR HOUSING IN OGDEN INCLUDE:

Policy 1: Creating Healthy Neighborhoods.

Ogden's HUD-funded programs are working together to create healthy neighborhoods. The City's HUD Programs coordinate resources to create communities of choice by promoting and supporting decent housing, creating a suitable living environment and expanded economic development opportunities, principally benefiting low- and moderate-income persons.

Policy 1: Preserving Naturally Occurring Affordable Housing.

Ogden's HUD-funded housing purchase, rehab, resale program utilities CDBG and HOME funds to transform housing units (often those aging and in disrepair) into quality homes. Our goal is to provide diverse and balanced housing options across housing types, locations and affordability levels.

Policy 2: Support for Second/Accessory Dwelling Units.

Accessory Dwelling Units (ADUs) are an option in addressing Ogden's local housing needs. Ogden City permits secondary dwelling units as an accessory use in all residential zoning districts, when an owner occupies one of the units and detached units shall not be less than 300 square feet or more than 800 square feet in unit size and shall not occupy more than 25% of the rear yard area or of the lot. With over 22,00 existing single-family parcels in the city, Ogden has substantial potential to accommodate accessory dwelling units. Ogden has adopted a new Residential zoning area to increase housing density. Zoning for ADU's is available throughout most of the city.

Policy 3: Neighborhood Revitalization Strategy Area (NRSA).

Ogden City's HUD funding has been effectively used to implement a NRSA plan aimed at assisting Ogden's East Central and Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) in Ogden. Over the past 15 years, Ogden has seen a steady decline in R/ECAPs. The only two R/ECAPs in Weber County are in Ogden. The NRSA will address the area's economic needs through economic development programs designed to spur businesses to relocate or expand into the area and to create jobs and targets HUD funding to preserve the naturally occurring affordable housing in the community.

Policy 4: Support for Persons seeking US Citizenship

The purpose of Ogden's Citizenship PATH pilot program is to aid qualified residents of Weber County in becoming Naturalized U.S. Citizens by removing barriers that hinder them from obtaining citizenship status and become active civic members of the community. This program includes classes, civic education, legal assistance, and more. Helping families stay together and thrive.

Policy 5: Ogden Community Engagement and Opportunity Commission

To establish a collaborative connection between the City, individuals, institutions, and organizations working toward meeting the needs of our diverse community. This commission reports to the Mayor. Collaborative connections are used to identify and resolve issues, promote opportunities, cultivate positive cultural awareness, promote cultural traditions, and enhance the well-being and quality-of-life of those living in or visiting Ogden, Utah. The Commission envision an Ogden that is inclusive and welcoming - thriving on the trust, dignity, and interdependence of our diverse community.

Policy 6: Support Permanent Supportive Housing

Ogden City has provided support for permanent supportive housing, and recently assisted the Ogden Housing Authority with a new permanent supportive public housing community on 31st and Lincoln in Ogden, Utah. The 56-Unit matrix for this building consists entirely of one-bedroom units plus a common area. Seven of the units will be Type A which are totally ADA accessible.

Policy 7: Support Transitional Housing

YCC's transitional housing apartments project includes six studio and eight flex units to house survivors of domestic violence, who are currently in crisis shelter, and need ongoing supportive case management and protection. Transitional housing reduces burdens on healthcare, first responders, the judicial system, child protective services, reliance on government support, homelessness, and crime. More importantly, it reduces the chances of a victim returning to their abuser. Ogden supports the YCC in efforts to house survivors of domestic violence.

Policy 8: Reduced Residential Parking Standards.

The city has reduced its parking requirements for multi-family developments, reducing the potential financial impact that parking has on housing developments. The citywide parking standards for multiple-family housing were modified in 2023. The parking reduction lessens the potential constraint that land requirements and costs have on housing development.

Policy 10: Zong to new Housing Developments.

Ogden has zoning regulations and other development practices that are very favorable toward the construction of new housing. This resulted in Ogden issuing permits for over 2,000 new dwelling units from 2020-2023. Ninety-six percent of these were for multiple-family dwelling units or townhomes. Ogden currently has applications in review, approved, or under construction for over 3,400 new multiple-family dwelling units. About one-third of the new apartment projects are in commercial zones outside of downtown: C-2 and CP-2 Zones (Community Commercial) and the C-3 and CP-3 Zones (Regional Commercial). Ogden is re-examining whether apartments in these commercial zones provide healthy neighborhoods. Since these commercial zones were designed for retail and business uses and not housing, many lack close access to parks, schools, safe biking and walking paths, and neighborhood amenities. While this examination takes place through the general plan and zoning ordinance update, the Ogden City Council has amended the zoning ordinance to limit new apartment projects in commercial C-2/CP-2 and C-3/CP-3 zones. This will give Ogden time to thoroughly plan through an extensive community vision process for healthy neighborhoods that accommodate our housing needs.

General Plan

The City's "Plan Ogden" initiative is to develop a new citywide vision and to perform a comprehensive update to the city's General Plan. The Vision and General Plan will address topics, such as housing, transportation, open space, economy, utilities, the environment, and much more. The vision and general plan will be based on the community's values, priorities, and vision for the future. We are looking all the way out to 2050! There have been several opportunities for the community to contribute to this process and to influence its outcome. This is an opportunity for community members to provide feedback on how well they think each growth scenario addresses Ogden's future opportunities and challenges.

SECTION VII. IMPEDIMENTS, AI GOALS AND ACTION ITEMS

Impediment #1: High rate of people experiencing housing issues (i.e. evictions and mortgage loan denials)

Goal: Reduce the number of people experiencing housing issues and increase the number of homebuyers having successful home purchase experiences.

Action Items:

1. Require and fund homebuyers participating in the city's HOME program to attend Homebuyer education.
2. Work with the Disability Law Center to provide Fair Housing testing in Ogden and to provide free advocacy assistance to persons experiencing eviction or threat of eviction.
3. Participate in Fair Housing workshops, events and Fair Housing Trade Show.
4. Collaborate with organizations that specialize in housing counseling and eviction prevention.

5. Partner with organizations that serve minority populations (i.e. Suazo Center, LUPEC, Utah Hispanic Chamber, Community Engagement and Opportunity Commission, Asian Association of Utah, Catholic Community Services (serving refugees, immigrants and the homeless)).
6. Update and simplify the city's online presentation of Fair Housing complaint process. Emphasize ease of the complaint process and resources to help.

Impediment #2: Ineffective Fair Housing infrastructure and complaint process

Goal: Improve the city's Fair Housing infrastructure to provide an effective resource center for Fair Housing and easy to follow complaint process.

Action Items:

1. Educate staff, partners, and public on Fair Housing rights.
2. Update the City's Fair Housing website to include helpful resources, such as QR codes and links to assist in finding Fair Housing information.
3. Consistently translate program guidelines and applications to Spanish.
4. Publish ConPlan notices in English and Spanish.
5. Optimize the organization of Fair Housing materials on the City's website to ensure that a search for "housing discrimination" leads to Fair Housing information and materials.
6. Maintain a centralized list of resources for assisting Limited English Proficiency (LEP) individuals.
7. Utilize the City's Language Assistance Plan (LAP) to increase effectiveness of program administration to LEP.
8. Post a list of City employees who are certified interpreters on the City's Intranet for Ogden City staff to access when assisting people with LEP.
9. Additional outreach to minorities to increase the number of minorities participating in the city's programs.
10. Promote April as Fair Housing month and utilize the Fair Housing logo to raise awareness of FH.

Impediment #3: Lack of affordable housing and housing problems.

Goal: Provide diverse and balanced housing options across housing types, locations and affordability levels.

Action Items:

1. Partner with local lenders and non-profit groups and private investment companies to expand Ogden City's Community and Economic Development Department's access to funding to improve the quality of housing in the NRSA that has two R/ECAP Census Tracts.
2. Fund housing rehabilitation projects to preserve the naturally occurring affordable housing in Ogden and to assist low-income homeowners with emergency home repairs.
3. Utilize the NRSA to provide a diverse balance of quality housing options in R/ECAPs.
4. Modify the Own In Ogden downpayment assistance program to help increase home affordability.
5. Participate in Weber County's Healthy Homes program.
6. Outreach to minority groups, especially those least likely to participate.

7. Engage the State and Weber County communities to develop solutions that de-concentrate low-income housing in Ogden.
8. Include the public in the adoption of a new city General Plan that addresses housing, zoning and infrastructure needs.

Impediment #4: Weak Public Transportation options

Goal: Improve the access to public transportation to all areas of the city.

Action Items:

1. Work with UDOT to improve bus and transportation options.
2. Strategically plan and locate OGX stops and bus stop locations that connect housing to jobs, frontrunner and essential services.
3. Expand OGX frequency of stops and additional stops.
4. Increase alternative transportation options: green bikes, scooters and dedicated bike lanes.
5. Include the public and expand public outreach in the efforts (Plan Ogden) to develop a new Ogden City General Plan.

SECTION VIII. CONCLUSION

The Analysis of Impediments to Fair Housing Choice (AI) Report provides insights into the challenges faced by minority individuals, families and members of the protected classes. Demographic data, Utah Healthy Places Index, Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) mapping tool and Housing Market data provides a snapshot of living conditions in Ogden and helps to identify community needs and distressed neighborhoods. The AI examines key fair housing concerns, such as mortgage lending practices, home appraisal practices, Fair Housing survey indicators and Fair Housing complaints data. As this Analysis of Impediments has identified, Ogden City continues to face various challenges addressing the barriers of fair housing choice, especially affordable housing for low- and moderate-income households, which are often of minority, disabled or senior households.

In addition to the AI, the city has initiated numerous public outreach events for the city's Five Year Consolidated Plan planning process and in the city's zoning and General Plan planning process, which are currently underway. In collaboration with the community residents, stakeholders, and non-profit and for-profit partners, the city can build on recent improvements, city strengths, and opportunities to increase fair housing choice moving forward. The list of Impediments and Action Items in this AI can serve as a roadmap for both policymakers and the public to focus efforts that advance fair housing choice in the near future. The AI's Action Items are designed to guide the city's current policies and programs. The Action Items will be addressed over the next five years, aligning the accomplishments of these actions with the consolidated planning cycle. Ogden City will continue to strive to affirmatively further fair housing and reduce these barriers to promote fair housing choice.

SECTION IX. 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, Benjamin K. Nadolski

Date

Appendix A - Fair Housing Survey and Community Outreach

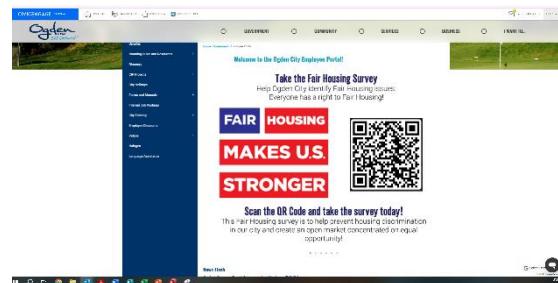
Fair Housing Survey post cards



Lobby Fair Housing Survey Outreach



Lobby Fair Housing Survey Marketing



Fair Housing AI pics Farmers Market 6/8



Fair housing outreach
2866 Quincy Open House June 12, 2024



Fair housing outreach
April Fair Housing Month



CED's Citizen Advisory Committee
(CAC) January 10, 2025



Housing Authority City of Ogden
Resident Advisory Board



- Fair Housing Outreach at WSU Immigration Night
December 18, 2024

