

ANALYSIS OF IMPEDIMENTS to FAIR HOUSING CHOICE

City of Ogden

MAY 2020



PREPARED BY OGDEN CITY COMMUNITY AND ECONOMIC DEVELOPMENT DEPARTMENT

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Introduction

An Analysis of Impediments to Fair Housing Choice (AI) is a comprehensive review of municipal housing, economic, and transportation conditions, as well as public and private sector policies in order to ensure that housing choices and opportunities for all persons in a community are available. Under the HOME and Community Development Block Grant (CDBG) statutes, the AI is a document required by U.S. Department of Housing and Urban Development (HUD) as part of the Five Year Consolidated Plan 2021-2025 (ConPlan). The city must certify to HUD that an AI was conducted, and fair housing action steps are being implemented. Goals and objectives are designed to identify and mitigate obstacles to fair housing choice. Action items are included in the Five Year ConPlan.

Since the last Analysis of Impediments to Fair Housing Choice was completed in 2015, Ogden City has actively worked to meet the objectives outlined in the AI and to find ways to mitigate or remove barriers to fair housing. Ogden City has worked with the Utah Fair Housing Forum, Ogden Housing Authority, Weber Housing Authority, the Disability Law Center, Utah Anti-discrimination and Labor Division and Ogden Community Action Network (OgdenCAN) to identify impediments to fair housing choice and to develop fair housing choices throughout the city.

Analysis of Impediments to Fair Housing Choice Process

Developed to accompany the City of Ogden's ConPlan 2021-2025, this AI has been completed to meet requirements of the Housing and Community Development Act and HUD regulations governing the preparation of the ConPlan. To assist in the development of Ogden's AI, the city consulted with various community stakeholders. Several sources contributed to the AI by providing studies and reports: OgdenCAN contributed a Housing Needs Assessment for Ogden and its East Central Neighborhood; James Wood's Economic Forecast January 2017; Weber Housing Authority's Community Assessment & Strategic Plan 2019 by Ashley Barker Tolman Shuler, May 6, 2019; Gardner Business Review What Rapidly Rising Prices Mean for Housing Affordability by James Wood, Dejan Eskic, and D.J. Benway May 2018. These reports provides the data and research for the framework of Ogden's Analysis of Impediments to Fair Housing Choice 2020 by providing supportive data, tables, maps, research and analysis in determining housing needs in Ogden.

This AI process included: 1) gathering economic and housing data, employing mapping and analysis tools; 2) soliciting and ensuring meaningful community input from key stakeholders; 3) creating and prioritizing objectives, goals and outcomes that support a collective vision for fair housing choices.

AI Process

- Data analysis:
 - US Census data, American Community Survey & FFIEC data
 - HUD Comprehensive Housing Affordability Strategy data
 - National Low Income Housing Coalition reports
 - Home Mortgage Data
- Literature review
 - Ogden's Strategic Plan and Biennially Moderate Income Housing Report
 - Weber Co 2014 Regional AI and Weber Co. 2018 Homeless study
 - OgdenCAN's Housing Needs Assessment for East Central
 - HUD U.S. Housing Market Conditions reports
 - Gardner Business Review
 - U of U Kem Gardner Policy Institute Research Briefs

- Outreach to public
 - Ogden Housing Authority Resident Advisory Board
 - Jefferson Neighborhood group
 - Ben Lomond H.S. Family Night
- Consultation and partnering with stakeholders and community-based partners to identify resources critical to AI implementation
 - Ogden City Community and Economic Development's (CED) Citizen Advisory Committee
 - Stakeholders:
 - Ogden's Diversity Commission,
 - NAACP, Ogden Chapter
 - Latinos United Promoting Education and Civic Engagement (LUPEC)
 - Coalition of Resources (COR)
 - Utah Fair Housing Forum
 - Weber County Homeless Coordinating Committee
- Evaluate past performance
- Prepare Draft - Creating and prioritizing objectives, goals and outcomes that support a collective vision for fair housing choices
- City Council Work sessions
- 30-day public comment period and consider public comments
- City Council public hearing to adopt AI

Definition of Impediments to fair housing choice is:

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

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

Protected Classes

The federally protected classes are:

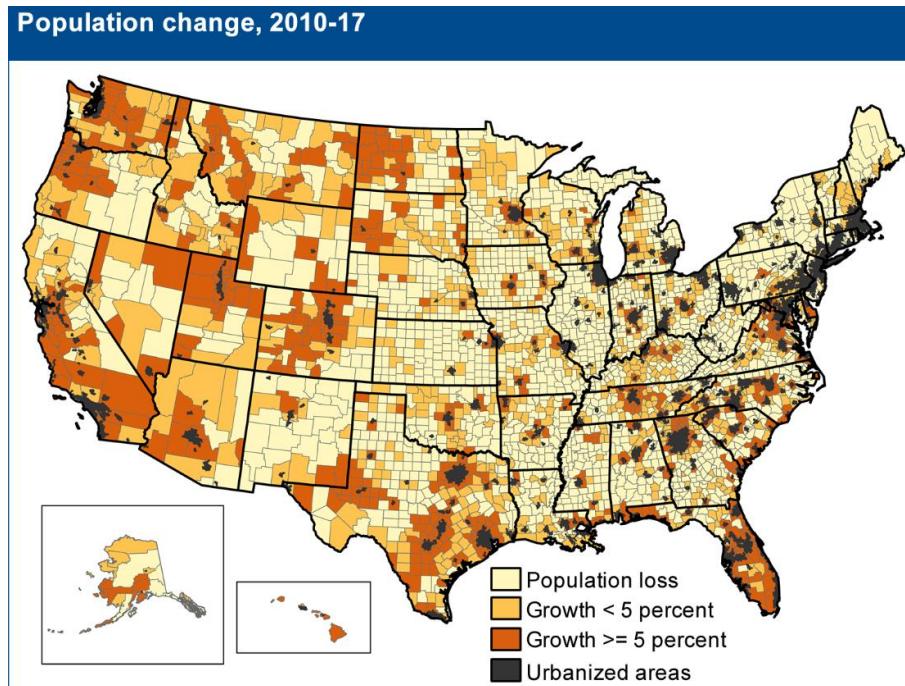
<ul style="list-style-type: none"> • Disability • National origin • Color • Sex 	<ul style="list-style-type: none"> • Familial status • Race • Religion
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I. Demographic Trends and Characteristics

Ogden's Population 87,325 (U.S. Census, 2018)

Ogden's population shows a modest increase over the past ten years. In 2010 the population of the city was estimated at 82,825 by the U.S. Census Bureau, an increase of 7.3 percent since 2000 Table 1 and 87,325 2018 population. Over the past twenty years the population of Ogden City increased by 22 percent. Ogden is the largest city in Weber County and accounts for about 36 percent of the population

of the county. The population growth of Ogden is lower than the 17.7 percent growth rate for the county. Ogden is a mature, older city with little opportunity for new large scale residential development on sizeable parcels of undeveloped land.



Other demographic characteristics of Ogden include:

10,837 households (13% of population) have a disability in Ogden (2013-2017 ACS)

The population of Ogden is getting older. The median age has increased from 28 years to 31 years.

Ogden Demographic Characteristics

	2000	2010	2017
Population	77,226	82,825	85,497
Median Age	28.6	29.6	31
Households	27,384	29,631	30,154
Average Household Size	2.73	2.73	2.73
Minority Population	21.2%	36.5%	40%
Population disabled		12.6%	10.1%
Population in poverty		21.3%	21.4%

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

Source: U.S. Census 2000, 2010, 2012 and 2017 SF1 and S1810

2019 FFIEC Census Report - Summary Census Population Information

MSA/MD 36260- OGDEN-CLEARFIELD, UT

County Code	Tract Code	Tract Population	Tract Minority %	Number of Families	# of Households	Non-Hisp White Population	Tract Minority Population	American Indian Population	Asian/ Hawaiian/ Pacific Islander Population	Black Population	Hispanic Population	Other Population / Two or More Races
57	2001	4,559	25.69	1,096	1,535	3,388	1,171	23	20	0	1,071	57
57	2002.02	3,438	38.98	756	1,510	2,098	1,340	21	115	160	936	108
57	2002.03	5,114	39.46	1,246	1,586	3,096	2,018	1	87	54	1,835	41
57	2002.04	4,885	36.13	1,238	1,628	3,120	1,765	0	133	0	1,465	167
57	2003	6,845	41.3	1,534	2,245	4,018	2,827	0	8	114	2,697	8
57	2004	1,897	49.02	428	656	967	930	11	15	13	808	83
57	2005	6,658	35.72	1,701	2,422	4,280	2,378	9	23	31	2,235	80
57	2006	4,636	21.29	1,002	1,729	3,649	987	28	18	56	825	60
57	2007	2,989	13.72	771	1,282	2,579	410	0	53	69	265	23
57	2008	4,705	43.38	1,018	1,747	2,664	2,041	5	51	5	1,885	95
57	2009	3,970	56.45	791	1,576	1,729	2,241	19	18	78	1,944	182
57	2011	1,985	33.1	194	879	1,328	657	64	49	169	368	7
57	2012	2,274	69.22	495	803	700	1,574	58	22	173	1,258	63
57	2013.01	2,658	46.09	494	1,049	1,433	1,225	86	0	35	1,077	27
57	2013.02	3,704	54.75	756	1,180	1,676	2,028	36	142	41	1,802	7
57	2014	3,113	20.21	832	1,238	2,484	629	53	86	0	280	210
57	2015	4,129	10.17	1,048	1,466	3,709	420	43	34	16	248	79
57	2016	4,190	25.97	855	1,541	3,102	1,088	0	94	106	780	108
57	2017	3,493	54.11	812	1,165	1,603	1,890	122	4	0	1,731	33
57	2018	1,930	63.78	431	741	699	1,231	24	20	11	1,148	28
57	2019	1,337	46.37	276	382	717	620	5	0	47	540	28
57	2020	5,726	17.57	1,413	1,901	4,720	1,006	48	242	135	353	228
TOTALS		84,235		19,187	30,261	53,759	30,476	656	1,234	1,313	25,551	1,722

Minority Population

40% of Ogden's population is of minority heritage (U.S. Census, 2017)

Ogden has a higher minority population than the county and state population. In 2000, the minority population in the city totaled 16,395 individuals. By 2010, the number of minority individuals in the city had increased by 84.6 percent to 30,268 and by 2017 the minority population increased to 35,014 persons. In 2010, one in three (29.99%) individuals in Ogden City is a minority up from one in five in 2000. 2017 Census data reveals an increase to 40.23% of the population is a minority. In 2017, the city has by far the largest concentration of minority individuals of any study city. 40.23% of Ogden's population is minority with 82% of the minority population in Ogden are of Hispanic heritage. 2017 US Census data estimates 40.23% of Ogden's Population is a minority, compared to 23.96% in Weber County and 21.71% in Utah.

40.23% minority populations in Ogden, compared to 23.96% Weber County and 21.71% in Utah

The Table below provides percentages of the population by race and ethnicity in Ogden City. For example, the minority population in Ogden 36 percent of the population is minority and 30 percent is Hispanic.

Ogden City

Total Population	White alone, Non-Hispanic	Hispanic	African American	Pacific Islander	Asian	Native American	2 or more races /other
85,497	61.5%	32.3%	1.6%	0.2%	1.2%	1.1%	2.5%

Further review identifies the largest minority concentration in Ogden's East Central neighborhood, which is identified by HUD as a Racially Concentrated Area of Poverty. 2017 US Census data estimated the minority population in Ogden's East Central neighborhood at 50.61 % of the population.

Income

The Federal Financial Institutions Examination Council (FFIEC) provides annual census data estimates for cities nationwide. The Median Family Income in 2019 for Ogden is \$83,200, an increase from \$71,742 the Family Median Income in 2015. The FFIEC estimates that 23% of Ogden's population is below the poverty line. Poverty guidelines are established by the federal government. A household of four with an income at or below \$25,701 is considered to be in poverty.

2019 FFIEC Census Report - Summary Census Income Information

MSA/MD: 36260- OGDEN-CLEARFIELD, UT

County Code	Tract Code	Tract Population	Tract Income Level	2015 MSA/MD Median Family Income	2019 FFIEC Est. MSA Median Family Income	% Below Poverty Line	Tract Median Family Income %	2015 Tract Median Family Income	2019 Est. Tract Median Family Income	2015 Tract Median Household Income
57	2001	4,559	Moderate	\$71,742	\$83,200	15.05	74.69	\$53,587	\$62,142	\$52,040
57	2002.02	3,438	Moderate	\$71,742	\$83,200	27.15	52.05	\$37,348	\$43,306	\$30,514
57	2002.03	5,114	Moderate	\$71,742	\$83,200	28.83	60.11	\$43,125	\$50,012	\$41,034
57	2002.04	4,885	Moderate	\$71,742	\$83,200	10.78	77.53	\$55,625	\$64,505	\$49,211
57	2003	6,845	Moderate	\$71,742	\$83,200	30.4	60.82	\$43,636	\$50,602	\$43,063
57	2004	1,897	Moderate	\$71,742	\$83,200	24.93	50.39	\$36,154	\$41,924	\$31,250
57	2005	6,658	Moderate	\$71,742	\$83,200	12.34	62.59	\$44,910	\$52,075	\$44,079
57	2006	4,636	Middle	\$71,742	\$83,200	10.85	83.19	\$59,688	\$69,214	\$50,081
57	2007	2,989	Moderate	\$71,742	\$83,200	8.73	69.14	\$49,604	\$57,524	\$49,333
57	2008	4,705	Moderate	\$71,742	\$83,200	25.55	55.52	\$39,837	\$46,193	\$34,597
57	2009	3,970	Moderate	\$71,742	\$83,200	37.47	56.45	\$40,503	\$46,966	\$22,695
57	2011	1,985	Low	\$71,742	\$83,200	48.73	43.3	\$31,071	\$36,026	\$24,240
57	2012	2,274	Low	\$71,742	\$83,200	47.96	25.5	\$18,295	\$21,216	\$24,375
57	2013.01	2,658	Moderate	\$71,742	\$83,200	20.43	64.15	\$46,029	\$53,373	\$30,706
57	2013.02	3,704	Low	\$71,742	\$83,200	33.89	48.28	\$34,643	\$40,169	\$34,605
57	2014	3,113	Middle	\$71,742	\$83,200	9.73	88.06	\$63,182	\$73,266	\$55,100
57	2015	4,129	Upper	\$71,742	\$83,200	13.75	127.03	\$91,136	\$105,689	\$70,625
57	2016	4,190	Moderate	\$71,742	\$83,200	23.36	70.46	\$50,550	\$58,623	\$42,786
57	2017	3,493	Moderate	\$71,742	\$83,200	26.51	56.58	\$40,595	\$47,075	\$37,813
57	2018	1,930	Low	\$71,742	\$83,200	36.79	41.34	\$29,659	\$34,395	\$29,650
57	2019	1,337	Low	\$71,742	\$83,200	41.55	43.04	\$30,882	\$35,809	\$26,875
57	2020	5,726	Upper	\$71,742	\$83,200	14.18	128.18	\$91,964	\$106,646	\$78,275
TOTAL		84,235 Population				23%				

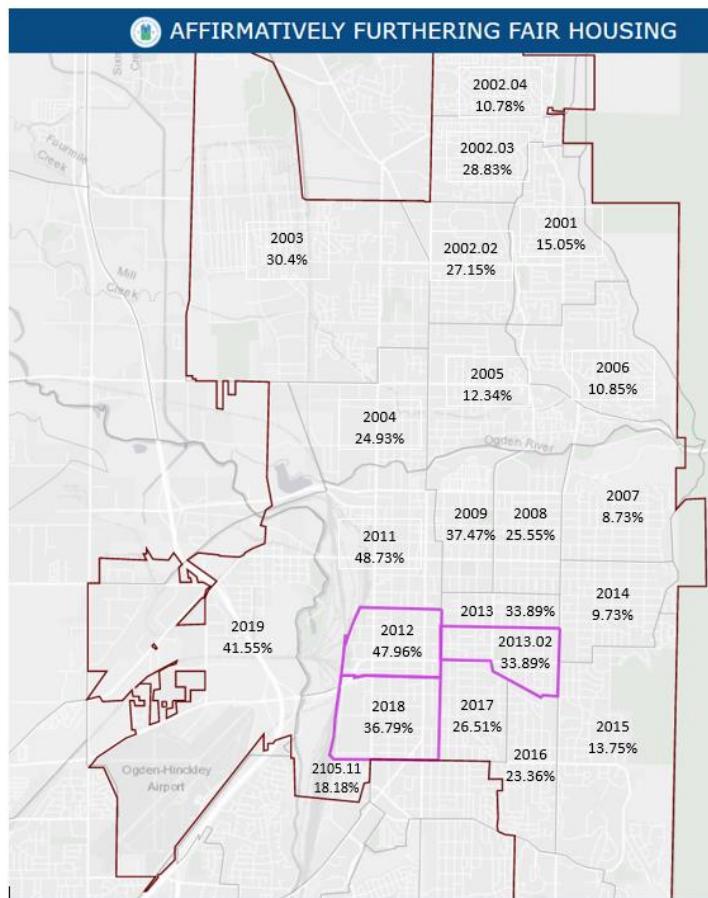
Poverty Thresholds for 2018 by Size of Family and Number of Related Children Under 18 Years

Size of family unit	Weighted average thresholds	Related children under 18 years								
		None	One	Two	Three	Four	Five	Six	Seven	Eight or more
One person (unrelated individual):										
Under age 65.....	\$ 12,784.00									
Under age 65.....	\$ 13,064.00	\$ 13,064.00								
Aged 65 and older.....	\$ 12,043.00	\$ 12,043.00								
Two people:	\$ 16,247.00									
Householder under age 65.....	\$ 16,889.00	\$ 16,815.00	\$ 17,308.00							
Householder aged 65 and older.....	\$ 15,193.00	\$ 15,178.00	\$ 17,242.00							
Three people.....	\$ 19,985.00	\$ 19,642.00	\$ 20,212.00	\$ 20,231.00						
Four people.....	\$ 25,701.00	\$ 25,900.00	\$ 26,324.00	\$ 25,465.00	\$ 25,554.00					
Five people.....	\$ 30,459.00	\$ 31,234.00	\$ 31,689.00	\$ 30,718.00	\$ 29,967.00	\$ 29,509.00				
Six people.....	\$ 34,533.00	\$ 35,925.00	\$ 36,068.00	\$ 35,324.00	\$ 34,612.00	\$ 33,553.00	\$ 32,925.00			
Seven people.....	\$ 39,194.00	\$ 41,336.00	\$ 41,594.00	\$ 40,705.00	\$ 40,085.00	\$ 38,929.00	\$ 37,581.00	\$ 36,102.00		
Eight people.....	\$ 43,602.00	\$ 46,231.00	\$ 46,640.00	\$ 45,800.00	\$ 45,064.00	\$ 44,021.00	\$ 42,696.00	\$ 41,317.00	\$ 40,967.00	
Nine people or more.....	\$ 51,393.00	\$ 55,613.00	\$ 55,883.00	\$ 55,140.00	\$ 54,516.00	\$ 53,491.00	\$ 52,082.00	\$ 50,807.00	\$ 50,491.00	\$ 48,546.00

Source: U.S. Census Bureau.

<https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html>

Poverty Rate by Census Tracts



Source: HUDegis.hud.gov/affht/ Map12/AFFHT0004

Data Source: CHAS 2009-2013, Updated November 2017

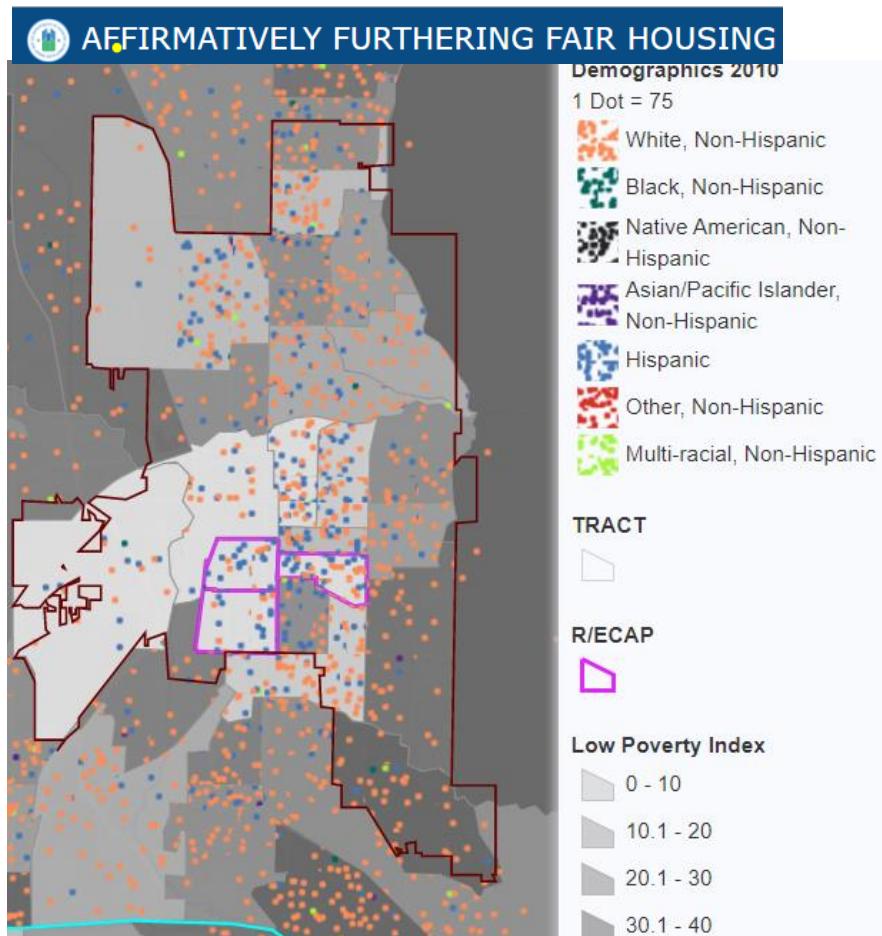
The map above provides poverty rates in each Ogden City census tract. Census tracts within Ogden City's Racially Concentrated Areas of Poverty (RCAPs) are highlighted (RCAP is further discussed on Page 9).

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

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

A RCAP has a minority population at 50% or greater and poverty rate at 40% or greater, or three times the poverty rate of the county. The Weber County poverty rate is 10.8% (US Census Bureau QuickFacts 2013-2017). A local area is considered highly concentrated when it has 32.4 percent or more of the population living in poverty. RCAP and ECAP tracts are 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 and minority residents would be less severe and more evenly distributed in Weber County.

Ogden RCAPs

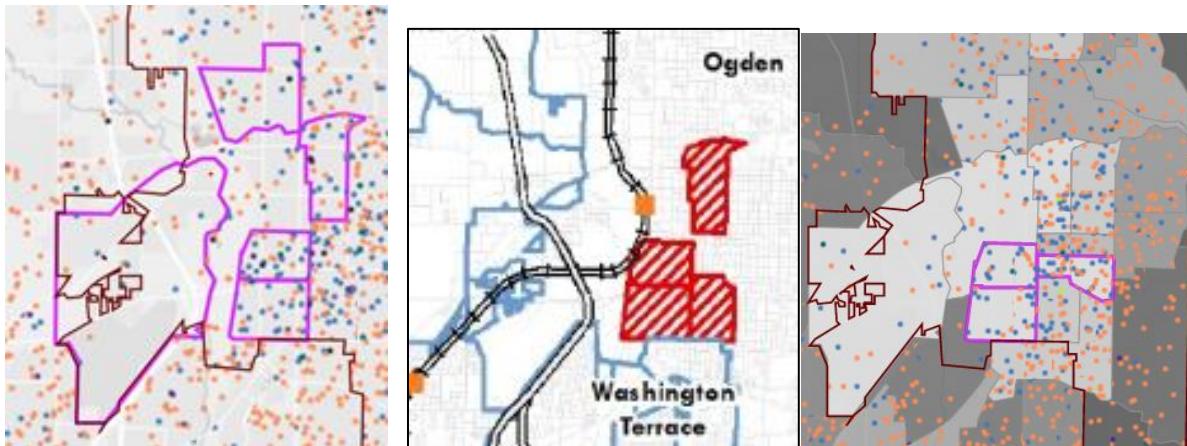


Source: HUD AFFHT0004 Map 12: CHAS data 2009-2013 (updated: Nov 2017) CT: 2012, 2013, 2018

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

Ogden has reduced from 5 RCAPs to 3 RCAPs

Figure 2- RCAPs in Ogden from 2010 to 2017



Source: HUD AFFHT0002 Map 12
2010 Demographics. Census Tracts:
2004, 2009, 2012, 2018, 2019

Source: Weber Co RAIFHEA
May 2014 ACS data 2007-2011
Census Tracts: 2009, 2012,
2017, 2018

Source: HUD AFFHT0004 Map 12:
CHAS 2009-2013 (Nov 2017)
Census Tracts: 2012, 2013, 2018

RCAPs decreasing in Ogden

HUD's Affirmatively Furthering Fair Housing mapping tool AFFH0002 identifies RCAPs for local governments. The HUD mapping tool illustrates a decrease in the number of RCAPs in Ogden between 2010 and 2013 data. In addition, published in the [Weber County Regional Analysis of Impediments to Fair Housing Equity Assessment](#), there are four identified RCAPs, all of which are in Ogden in May 2014. Data estimates from 2010 demographics identify five RCAPs, then May 2014 four RCAPs were identified by Weber County using American Community Survey 5-Year Estimates (ACS) 2007-2011 and finally, HUD CHAS data for 2009-2013 estimates identified three RCAPs. The data estimates indicate a reduction in the RCAPs in Ogden between 2010-2013.

Utah has become the national leader in addressing intergenerational poverty.

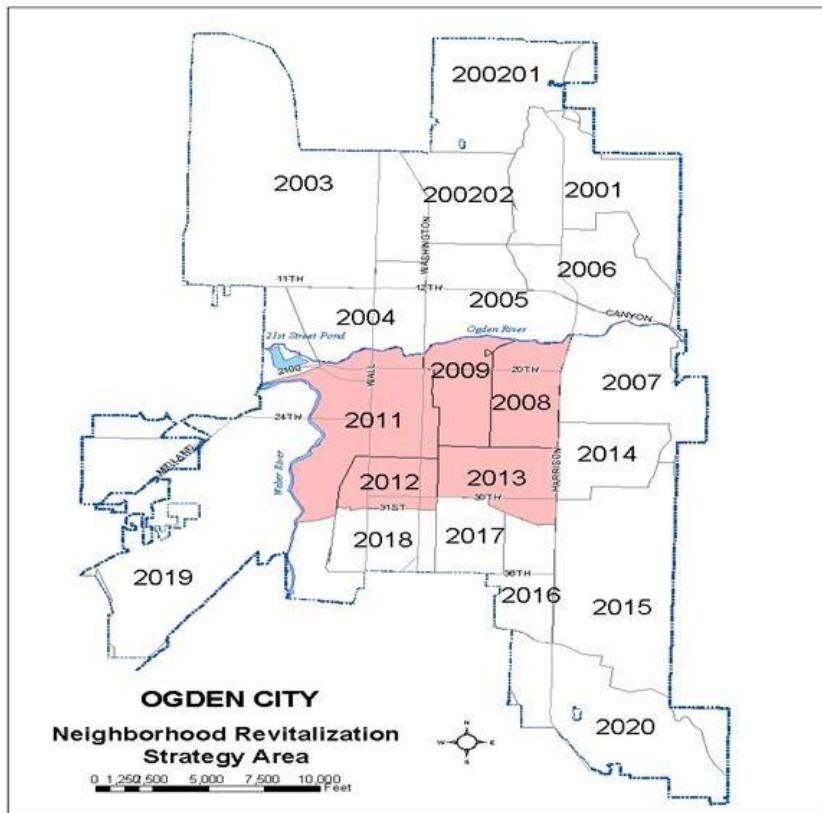
“Utah has become the national leader in addressing the issue of intergenerational poverty. Most importantly, the number of individuals identified as experiencing intergenerational poverty in 2012 had decreased significantly by 2017. Among children identified as intergenerational poverty, there have been improvements in each domain of child well-being with greatest progress made in the areas of early childhood development and education, where the graduation gap between students experiencing intergenerational poverty and all students has closed dramatically through the years.” 2019 Intergenerational Poverty Report Utah Div. of Workforce Services.

Ogden City is actively working on reducing poverty and income equality. “By working as a community to increase overall prosperity, Ogden has moved past the economists' discussion about how to redistribute existing wealth to focus on attracting new wealth by cultivating businesses that offer higher labor income to its residents and enlarging the “pie” described by Stiglitz.

Higher labor income, plus a lower cost of living, leads to a greater savings rate and wealth accumulation. Perhaps this period is not the end of the American dream but only marks its redefining", says Tom Christopoulos, "From a philosophical standpoint, we would just as soon find a way to create more overall wealth and raise the level of all income," he says. "That is more related to economic opportunity than a gap between the rich and the poor." Source: Newsweek article, *As Wealth Inequality Soars, One City Shows the Way* BY LEAH MCGRATH GOODMAN ON 09/24/15 <https://www.newsweek.com/2015/10/02/inequality-wealth-gap-ogden-utah-375820.html>

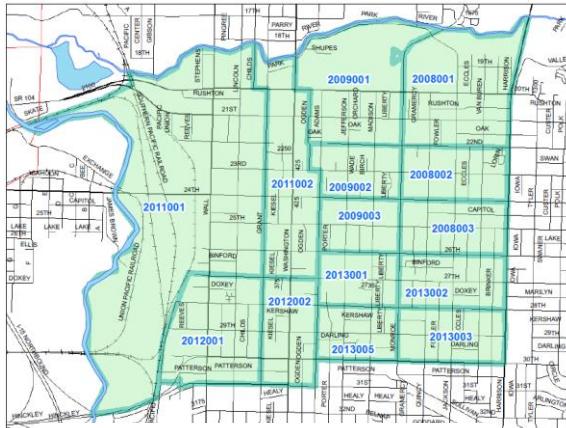
Neighborhood Revitalization Strategy Area (NRSA)

Ogden City's five year ConPlan provides the strategy for implementation of HUD-funded housing and economic development projects. Adopted along with the ConPlan is a Neighborhood Revitalization Strategy Area (NRSA) plan, which targets Community Development Block Grant (CDBG) and HOME Investment Partnerships Grant (HOME) funding in support of community revitalization. The NRSA provides the framework to create opportunity in distressed neighborhoods by stimulating the investment of human and economic capital and by economically empowering low-income residents. Below is map of the NRSA.



East Central Neighborhood

At the heart of the NRSA is the East Central neighborhood. East Central neighborhood is roughly the area between Washington Blvd. and Harrison Blvd., between 20th St. and 30th St. but extends to cover nearly all of the total area in census tracts 2008, 2009, 2013.01, and 2013.02. The East Central neighborhood can often be interchanged with the NRSA.



East Central Neighborhood Map

The AI has a broad analytical scope that encompasses issues associated the protected classes covered by the Fair Housing Act. The data and tables above provide a context for the AI and identifies the largest populations of the protected classes, and geographic areas of minority concentration, which is helpful to identify areas where discrimination is most likely to occur against protected classes.

II. Employment Trends, Education and Characteristics

Ogden is the employment center for Weber County with employment of 66,255 jobs

Ogden City (“City”) possesses more jobs than workers in the City’s labor force, making the City a crucial employment center for both the County and the region at-large. 50.2% (41,505 persons) of Ogden City’s residents participate in the labor force. However, City Employers collectively maintain 66,255 jobs. 59.3% jobs in Weber County (“County”) are located it’s’ county seat, Ogden City.

Ogden City - Available Jobs

Geography	Total Jobs	% of Jobs are in Ogden	% of Persons in Labor Force	Jobs Per Person in Labor Force
Utah	1,562,570	4.2%	53.5%	0.98
MSA: Ogden-Clearfield	270,838	24.5%	52.8%	0.80
Weber County	111,730	59.3%	52.9%	0.86
Ogden City	66,255	100.0%	50.2%	1.54

Data Source: Mark Knold, Senior and Supervising Economist Utah Department of Workforce Services

Ogden unemployment rate 3.3%

The City’s Unemployment Rate (3.3% in August 2019) is higher than the County, Ogden-Clearfield Metropolitan Statistical Area (“MSA”), and the State of Utah (“State”).

Available Labor Force

Area	Unemployment Rate	Persons in Labor Force	Employed Persons	Unemployed Persons	Population
Utah	2.8%	1,601,441	1,556,358	45,083	2,993,941
MSA: Ogden-Clearfield	2.8%	338,831	329,348	9,483	642,274
Weber County	3.0%	129,232	125,311	3,921	244,101
Ogden City	3.3%	42,938	41,505	1,433	85,497

Data Source: Local Area Unemployment Statistics (LAUS), August 2019, <https://www.bls.gov/data/>

Transportation Costs

“In general, housing becomes more affordable the further it is from the centers of business in an area. Households are expected to rent or purchase housing at an optimal location that balances housing costs and transportation costs. With less disposable income, the opportunity to save money on transportation costs by living in affordable housing that is closer to one’s workplace provides significant benefits for low-income workers trying to make ends meet.” Source: Affordable Housing Report 2018, Utah Division of Workforce Services Housing & Community Development. P. 39

Travel Time to Work	
Duration	Percent
10-14 Minutes	18.2%
15-19 Minutes	21.5%
20-24 Minutes	20.0%
24-29 Minutes	14.0%
30-34 Minutes	5.3%
35-44 Minutes	7.5%
45-59 Minutes	2.7%
60 or more Minutes	4.4%

Data Source: Commuting Characteristics: 2013-2017 American Community Survey 5-Year Estimates; <https://factfinder.census.gov/>

Employment and Income

The City’s Median for one earner is \$34,258, which is 39.5% less than the County and 35.9% less than the MSA.

Geographic Area	Median Income One-Earner Households	
	Median Income (1 earner)	% higher than City
MSA: Ogden-Clearfield	\$ 53,452.00	35.9%
Weber County	\$ 56,656.00	39.5%
Ogden City	\$ 34,258.00	0.0%

Data Source: Median Income In The Past 12 Months (In 2018 Inflation-Adjusted Dollars): 2018 American Community Survey 1-Year Estimates; <https://data.census.gov/>

\$34,258 Median income for one earner Ogden household

In the current quarter, the mining, logging, and construction and the wholesale and retail trade sectors grew by 8,400 and 8,600 jobs, or 1.8 and 1.0 percent, respectively, and payrolls in the financial activities sector were flat. The unemployment rate in the region was 2.8 percent in the second quarter of 2019, down from 3.1 percent a year earlier.

In 2nd Quarter 2019, Ogden's unemployment rate is down from 3.1% to 2.8%

“During the second quarter of 2019— Utah had the second-highest rate of job growth in the nation, with nonfarm payrolls increasing by 46,200 jobs, or 3.1 percent, from a year earlier. The education and health services, the professional and business services, and the leisure and hospitality sectors increased by 8,000, 7,600, and 6,700 jobs, or 4.0, 3.5, and 4.5 percent, respectively. In addition, the manufacturing sector grew by 6,300 jobs, or 4.8 percent, accounting for nearly 60 percent of the manufacturing jobs added in the region.

The Ogden-Clearfield MSA grew by adding 200 new jobs in 2nd Quarter 2019

The County’s largest industries are Manufacturing (13.3%), Health Care and Social Assistance (12.6%), Retail Trade (11.4%), Education Services (10.2%) and Public Administration (8.7%). Hill Air force Base is also located within 15 minutes of the City’s center and employs 22,088 “Base Jobs” and 29,596 “Indirect Jobs”¹ to the region.”

Source: HUD Regional Housing Market Data 2nd Quarter 2019, Region 8.

Manufacturing is Ogden’s largest employment sector

Over the last two decades, Utah’s economy has become one of the most diverse in the country with booming tech, healthcare, and manufacturing sectors. We have experienced tremendous job growth, low unemployment rates, and have maintained a high quality of life.

\$ 85,000 Median Family Income Ogden-Clearfield (2019)

Labor Force vs Unemployment - August 2019

Area	Unemployment Rate	Persons in the Labor Force	Employed Persons	Unemployed Persons	Population
Utah	2.8%	1,601,441	1,556,358	45,083	2,993,941
MSA: Ogden-Clearfield	2.8%	338,831	329,348	9,483	642,274
Weber County	3.0%	129,232	125,311	3,921	244,101
Ogden City	3.3%	42,938	41,505	1,433	85,497

Data Source: Local Area Unemployment Statistics (LAUS), <https://www.bls.gov/data/>

Ogden has higher unemployment and poverty than the region or state.

¹ <https://www.hill.af.mil/LinkClick.aspx?fileticket=mlISD4ULhHw%3d&tabid=6756&portalid=58>

Even with an abundance of nearby jobs with wages that exceed the City's Median Income and are located within a commuting distance that is less than the Mean Travel Time for the City residents, the City struggles with both higher Unemployment Rates and Poverty Rates than communities in the region and the State.

III. Education

The City has 17.7% of its residents that are over 18 years old that are not high school graduates (or equivalent). While the State only has 8.2% of its residents that are over 18 years old that are not high school graduates (or equivalent).

17.7% residents over 18 years are not high school graduates or equivalent

Educational Attainment	Ogden City			
	18-24 years	25 + Years	% of 18+ Population	Poverty Rate
Total Population	10,020	52,388		
No High school graduate (includes equivalency)	1,649	9,056	17.2%	29.7
High school graduate (includes equivalency)	3,325	15,175	29.6%	19.5
Some college or associate's degree	4,698	17,792	36.0%	15.3
Bachelor's degree or higher	348	10,365	17.2%	7.5

Educational Attainment	
18+ Years and NOT High school graduate or equivalency	Percent
Geographic Area	
NRSA: Ogden city, Utah	25.5%
Ogden city, Utah	17.2%
Weber County, Utah	10.5%
Ogden-Clearfield, UT Metro Area	7.7%
Provo city, Utah	5.9%
Salt Lake City, Utah	11.3%
Salt Lake County, Utah	9.3%
Utah	8.2%

Data Source: Population & Educational Attainment (by census tract): 2013-2017 ACS 5-Year Estimates; <https://factfinder.census.gov/>

In the NRSA, 25.5% residents over 18 years are not high school graduates or equivalent

The City's Neighborhood Revitalization Strategic Area ("NRSA") has 25.5% of its residents that are over 18 years old that are not high school graduates or equivalent. Poverty Rates are higher in areas where individuals are less educated.

On average, Ogden residents possess less education than the state average.

Educational Attainment – Regional NRSA Analysis		Percent
18+ Years and NOT High school graduate or equivalency		17.2%
NRSA: All Census Tracts		25.5%
Census Tract 2008		18.4%
Census Tract 2009		30.9%
Census Tract 2013.01		27.5%
Census Tract 2013.02		27.0%
Census Tract 2011		14.9%
Census Tract 2012		25.0%
Census Tract 2018		39.9%
Ogden-Clearfield, UT Metro Area (EXCLUDING OGDEN)		6.1%
Weber County, Utah (EXCLUDING OGDEN)		6.7%
Ogden city, Utah (EXCLUDING NRSA)		14.4%

Data Source: Population & Educational Attainment (by census tract): 2013-2017 American Community Survey 5-Year Estimates; <https://factfinder.census.gov/>

Access to education is one of the five most common indicators of opportunity. Nearly 18% of City residents over 18-year-old are not high school graduates (or equivalent). While the State only has 8.2% of its residents that are over 18-year-old that are not high school graduates (or equivalent). The City's Neighborhood Revitalization Strategic Area ("NRSA") has 25.5% of its residents that are over 18-year-old that are not high school graduates (or equivalent). The NRSA provides the mechanism for the City to target HUD grants and resources in census tracts that have low opportunity.

IV. Housing Market Characteristics, Trends and Affordability

Housing Market Conditions

"Since 2010, Utah has led the country in employment and demographic growth. This growth has produced exceptionally strong demand for housing, which in turn has put upward pressure on housing prices." Source: Wood, J., & Eskic, D. (2016). *Housing Prices and the Threat to Affordability*. Kem C. Gardner Policy Institute, The University of Utah. *Research Brief*, 8.

Strong sales demand led to significant home price increases throughout much of the region, but a lack of for-sale inventory led to declining sales in most metropolitan areas.

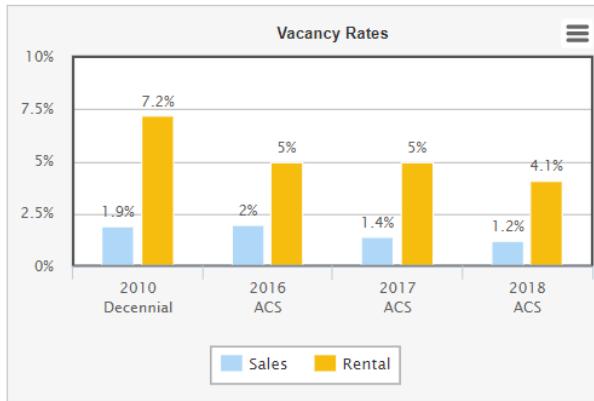
12 Months Ending	Number of Homes Sold				Price			
	2018	2019	Percent Change	Average or Median	2018 (\$)	2019 (\$)	Percent Change	
Cheyenne	March	3,000	3,025	1	AVG	251,300	258,400	3
Colorado Springs (N&E) ^a	March	18,900	17,750	-6	AVG	306,300	334,900	9
Denver (N&E) ^b	March	68,500	67,350	-2	AVG	434,200	463,300	7
Fargo	March	4,975	5,000	1	AVG	241,600	235,500	-3
Fort Collins	March	9,125	8,800	-4	AVG	389,700	408,700	5
Missoula	March	2,700	2,625	-3	AVG	284,200	301,500	6
Ogden (N&E) ^c	March	10,350	9,675	-7	AVG	276,000	304,000	10
Salt Lake City (N&E) ^c	March	18,300	17,500	-4	AVG	341,300	366,100	7
Sioux Falls (N&E) ^d	March	4,800	4,600	-4	AVG	220,100	231,300	5

AVG = average. N&E = new and existing.

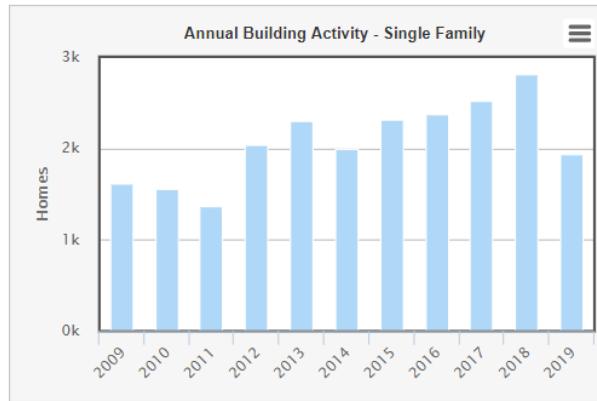
Notes: All figures are rounded. Salt Lake City metropolitan area data includes Salt Lake County only.

Sources: (a) Pikes Peak Association of Realtors[®]; (b) Colorado Association of Realtors[®]; (c) Utah Association of Realtors[®]; (d) Realtor[®] Association of the Sioux Empire, Inc.; all other metropolitan areas—Metrostudy, A Hanley Wood Company, with adjustments by the analyst

HOUSING MARKET CONDITIONS



Data Source: 2010 Census; 2016, 2017 and 2018 American Community Surveys (1 - Year)



Data Source: U.S. Census Bureau, Building Permits Survey

Note: Data for 2019 is preliminary, through September 2019

Housing Affordability

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

The [Affordable Housing Report 2018](#) states “Significant population growth from natural increase and economic development continue to drive Utah’s demand for housing. Production factors such as the high value of land, higher material costs, and a shortage of construction labor significantly contribute to delays in developing an adequate supply of affordable housing.”

Incomes not keeping up with the cost of housing

DEFINING HOUSING AFFORDABILITY

KEY POINTS:

- A housing unit is a house, an apartment, a mobile home or trailer, a group of rooms, or a single room that is occupied, or, if vacant, is intended for occupancy as separate living quarters.
- Affordable housing is any housing unit whose gross monthly costs, including utilities, are equal to no more than 30 percent of a household's gross monthly income.
- Cost-burdened households are households that spend more than 30 percent of their monthly income on housing costs.
- Severely cost-burdened households are households that spend more than 50 percent of their monthly income on housing costs.
- High housing costs reduce disposable income, which means that families with modest incomes have less money to pay bills, buy groceries and purchase other necessities.
- Real income growth is not keeping pace with rising rent prices.

Source: State of Utah, [Affordable Housing Report 2018](#), Utah Division of Workforce Services Housing & Community Development.

“Stagnant incomes, higher home prices and climbing mortgage rates made affording a home a lot more difficult for the average homebuyer during the second quarter.”

There is a gap between the number of families or individuals in need of housing and the available supply. For every four new households added in our state, there are only three new housing units, leading to upward pressure on housing costs. Source: Utah [Affordable Housing Report 2018](#) <https://www.utahbusiness.com/housing-affordability/>

“For every four new households added in our state, there are only three new housing units.”

Weber Co.	Median Household Income	Median Single-Family Home Sales Price
2000	\$44,014	\$117,372
2017	\$63,158	\$198,000
Average Annual Growth Rate	2.3%	3.8%
7 year estimate	44% increase	69% increase

Table 19
Number of Affordable New Homes in Weber County by Zip Code

Zip Code	2005		2012		2016		Change in Affordable New Homes 2005-2016	City
	Affordable New Homes	Total New Homes	Affordable New Homes	Total New Homes	Affordable New Homes	Total New Homes		
84067	8	76	29	41	9	31	1	Roy
84310	14	85	1	17	1	10	-13	Eden
84315	8	129	13	59	1	25	-7	Hooper
84317	7	111	0	12	1	6	-6	Huntsville/Ogden
84401	62	209	27	55	79	167	17	West Haven
84403	4	48	2	5	0	6	-4	Ogden/So. Ogden
84404	87	296	47	88	35	168	-52	Plain City/Farr West
84405	33	121	3	15	7	15	-25	Riverdale
84414	83	268	63	122	11	77	-72	Pleasant View
Total	305	1,348	185	414	144	510	-161	
	22.6%		44.7%		28.3%			

Source: Metrostudy.

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

"Weber County, at least in 2016, had a surprisingly small share of affordable new homes. Only 144 homes, or 28 percent, of the 510 new homes sold in the county were priced below the affordable threshold of \$271,789 (see Table 19). The rather low share in Weber County may be partly explained by the low median income in the county, which pushes down the affordability threshold. As the threshold is adjusted downward, it reduces the number of affordable homes." Source: [Gardner Business Review](#), May 2018 What Rapidly Rising Prices Mean for Housing Affordability by James Wood, Dejan Eskic and D.J. Benway.

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

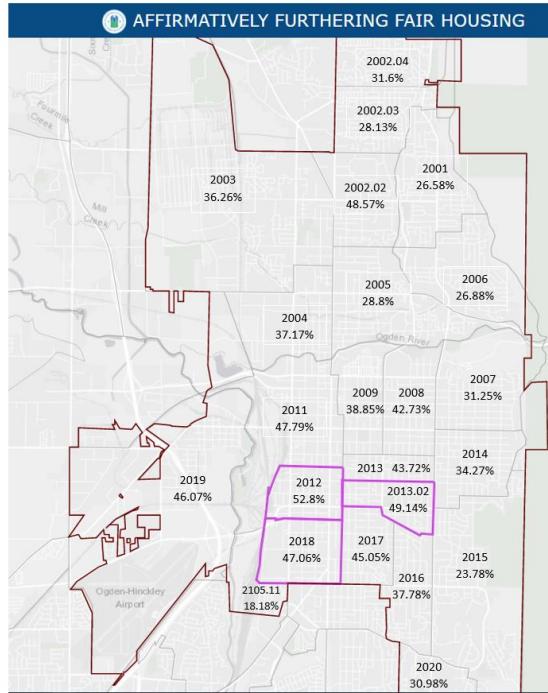
It will require a broader regional effort to successfully de-concentrate segregated neighborhoods in Ogden

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

Housing Problems

As defined by HUD, the four housing problems are 1) Incomplete kitchen facilities, 2) Incomplete plumbing facilities, 3) more than 1 person per room and 4) cost burden greater than 30% of housing income. Below is a HUD generated map which identifies the percent of households in that census tracts which are experiencing one of the four housing problems. The highlighted census tracts are identified by HUD as RCAPs.

% Households with any of the 4 Housing Problems



Housing Ten Source: HUDegis.hud.gov/affht/ Data Source: CHAS 2009-2013

In 2017, the inventory of residential units in Ogden was 32,642 units. Ninety-two percent of these units were occupied. CHAS data 2009-2013 updated November 2017 estimates Ogden has 29,463 occupied housing units of which 56% (16,369) are owner-occupied. Of the 16,369 owner-occupied housing units 78.43% are occupied by white alone not-Hispanic households. 2,745 Hispanic households own a housing unit in Ogden, making up 17% of owner-occupied housing units.

In Ogden, 78% of owner-occupied housing units are owned by White alone (non-Hispanic) households. While Hispanics homeownership rate is at 17% in Ogden.

Table 16 - Homeownership and Rental Rates by Race/Ethnicity

Ogden City - 2017 Estimates

Race/Ethnicity	Homeowners		Renters	
	#	%	#	%
White, Non-Hispanic	12,839	78.43%	8,499	64.91%
Black, Non-Hispanic	220	1.34%	360	2.75%
Hispanic	2,745	16.77%	3,545	27.07%
Asian or Pacific Islander, Non-Hispanic	225	1.37%	225	1.72%
Native American, Non-Hispanic	125	0.76%	300	2.29%
Other, Non-Hispanic	220	1.34%	160	1.22%
Total Household Units	16,369		13,094	

Ogden City-Clearfield MSA - 2017 Estimates

Race/Ethnicity	Homeowners		Renters	
	#	%	#	%
White, Non-Hispanic	131,235	89.70%	36,500	76.81%
Black, Non-Hispanic	989	0.68%	1,045	2.20%
Hispanic	10,199	6.97%	7,390	15.55%
Asian or Pacific Islander, Non-Hispanic	2,179	1.49%	1,300	2.74%
Native American, Non-Hispanic	490	0.33%	510	1.07%
Other, Non-Hispanic	1,195		765	1.61%
Total Household Units	146,310		47,520	

Note 1: Data presented are numbers of households, not individuals.

Note 2: Data Sources: CHAS 2009-2013 updated November 17, 2017

Note 3: Refer to the Data Documentation for details (www.hudexchange.info/resource/4848/affh-data-documentation).

Owner-occupied units accounted for 51% of all occupied units while renter-occupied units represented 41% the occupied housing inventory. Ogden City has a very high share of rental units. Statewide about 27% of the occupied housing inventory is rental units, well below the share in Ogden City.

“The East Central neighborhood has the lowest owner-occupancy rate hovering just below 40% throughout the time period. Ogden has the second-lowest owner-occupancy rate, between 55-60%,

peaking around 2005 at the height of the housing boom and tapering more recently. Owner occupancy rates in Weber County and Utah have remained around 70-75%, also peaking between 2000-2005 and declining slightly in recent years.” Source: Housing Needs Assessment for Ogden and its East Central Neighborhood 2019, Prepared for OgdenCAN, Jennifer Gnagey, Ph.D. (See page 9 for a discussion on RCAPs.

Rental Housing

92% of all Ogden housing units are occupied; 51% owner-occupied and 41% renter-occupied

Chart 22: Percent Increase in Rental Rates in Wasatch Front Counties, 2018

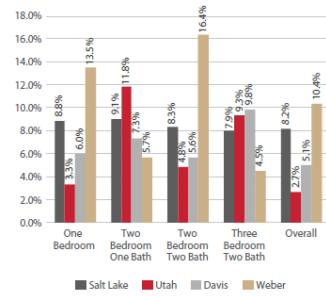
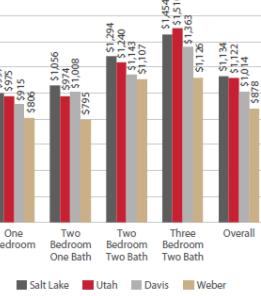


Chart 23: Rental Rates by Type of Unit in Wasatch Front Counties, 2018



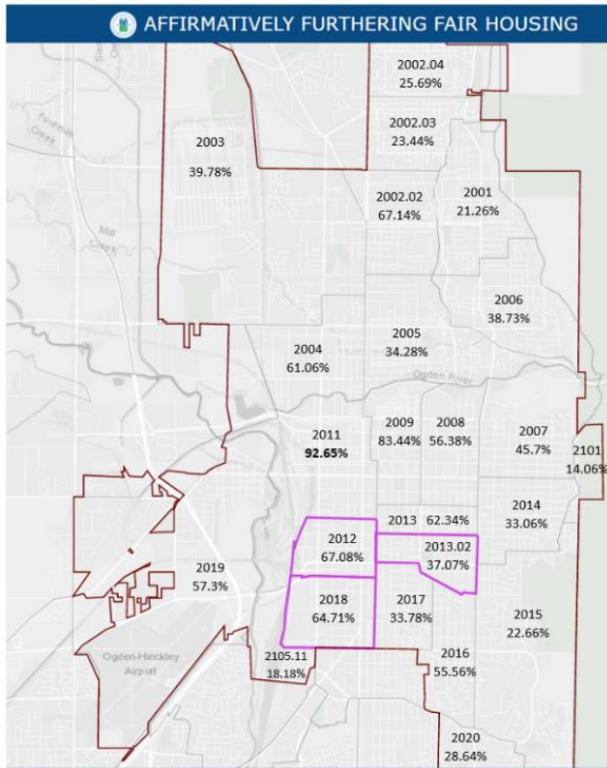
“Consequently, the lack of available housing has pushed many households into the rental market. In today’s market many households are not only priced out of the ownership market, but also the rental market. This distinguishing characteristic is likely due to the housing shortage, which was not present in past cycles. Rising rents means large numbers of renters face severe housing cost burdens. One in five renter households—nearly 60,000 renters—pay at least 50 percent of their income for housing costs. These households have the highest risk of homelessness.” James Wood, the Ivory-Boyer Senior Fellow at the university’s Kem C. Gardner Policy Institute, wrote in his report: [The Year in Charts: Utah’s Housing Market 2018](https://www.ksl.com/article/46541867/unaffordable-utah-housing-crisis-hits-renters-hardest). <https://www.ksl.com/article/46541867/unaffordable-utah-housing-crisis-hits-renters-hardest>

In the last five years, average rents have jumped 40.8% in Ogden, (RENTcafe)

“Strong population growth in much of the region, combined with rising home prices which made homeownership less attainable for many current renters, led to increased rental demand. Apartment completions continued at a strong pace, with approximately 6,100 units completed in the region during the second quarter of 2019, down from 6,500 units a year earlier (McGraw-Hill Construction Pipeline database). Absorption of the new apartments was strong enough, however, that vacancies declined or remained essentially unchanged from a year earlier in all metropolitan areas cited in this report.

In the Ogden and Salt Lake City metropolitan areas, conditions were balanced, with vacancy rates of 3.8 and 5.1 percent, and rent increases of 3 and 6 percent, to \$956 and \$1,085, respectively (Reis, Inc.).” Source: HUD PD&R Regional Reports, Regional 8 2nd Quarter 2019.

% Renters by Census Tract



The map above outlines Ogden's RCAPs. RCAPs are characterized by high rates of renter-occupied housing. Renter-occupied housing has a much higher likelihood of concentrations of low-income, minority renters. The dominance of rental housing in two of Ogden's three RCAPs is striking. In Census Tracts 2018, 64.71 % of housing units are rented; and in Census Tract 2012, 67.08% of housing units are rented. In contrast, Census Tract 2013, which is a newly identified RCAP area, has a rental rate of 37.07%, less rental units then more than half of census tracts in Ogden. Two of Ogden's RCAPs have high rental units and a newly identified RCAP census tract has over 37% rental units.

In today's market many households are not only priced out of the ownership market, but also the rental market.

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

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

UTAH

STATE RANKING #27*

In Ogden, the Fair Market Rent (FMR) for a two-bedroom apartment is \$910. In order to afford this level of rent and utilities – without paying more than 30% of income on housing – a household must earn \$3,033 monthly or \$36,400 annually.

This level of income translates into a hourly Housing wage of:

\$17.50
PER HOUR
OGDEN HOUSING
WAGE

FACTS ABOUT UTAH:

STATE FACTS

Minimum Wage	\$7.25
Average Renter Wage	\$14.37
2-Bedroom Housing Wage	\$18.30
Number of Renter Households	284936
Percent Renters	30%

MOST EXPENSIVE AREAS

HOUSING WAGE

Summit County	\$22.75
Salt Lake City, UT HUD Metro FMR Area	\$20.67
Wasatch County	\$19.87
Uintah County	\$17.62
St. George, UT MSA	\$17.62

MSA = Metropolitan Statistical Area; HMDA = HUD Metro FMR Area.

* Ranked from Highest to Lowest 2-Bedroom Housing Wage. Includes District of Columbia and Puerto Rico.

OUT OF REACH 2019 | NATIONAL LOW INCOME HOUSING COALITION

FACTS ABOUT OGDEN:

97

Work Hours Per Week at
Minimum wage to Afford a
2-Bedroom rental unit at FMR

76

Work Hours Per Week at
Minimum wage to Afford a
2-Bedroom rental unit at FMR

2.4

Number of Full-Time Jobs At
Minimum Wage To Afford a
2-Bedroom Rental Home (at FMR)

2.1

Number of Full-Time Jobs At
Minimum Wage To Afford a
1-Bedroom Rental Home (at FMR)

Two bedroom FMR

\$910

One bedroom FMR

\$713

Rent affordable at area median income
(AMI)

\$2,125

Rent affordable with full-time job paying
mean renter wage

\$612

Rent affordable at 30% of AMI

\$638

Rent affordable with full-time job paying
minimum wage

\$377

Rent affordable to SSI recipient

\$231

\$- \$500 \$1,000 \$1,500 \$2,000 \$2,500

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

Rental Assisted Housing

81% of Weber County vouchers holders live in Ogden.

76% of all County tax credit units are in Ogden.

89% of County HUD deep subsidized housing units are in Ogden.

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

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

Low Income Housing Tax Credits. Established by the Tax Reform Act of 1986, the LIHTC program is the most important and effective resource for the production of new, affordable rental units in Utah. The maximum rent that can be charged is based on the Area Median Income (AMI). Tax credit units target very low income households between 30 percent and 60 percent AMI. The rental rates for a tax

credit units are from 10 percent to 40 percent below typical market rate rents. The LIHTC program is one of a few programs providing rental assistance to very low and extremely low-income households. This program is a lifeline of affordability for several thousand Utah households.

Section 8 Housing Choice Voucher Program. HUD Section 8 vouchers provide direct support to renters. To qualify for a voucher a household's income cannot exceed 50 percent of the Area (county) Median Income. The voucher is a cash subsidy, which assists very-low-income renters with paying rent. Voucher holders pay no more than 30 percent of their income for rent and utilities. If rent and utilities exceed 30 percent of the household income, the voucher pays the difference up to what is known as the Fair Market Rent (FMR.) FMR levels for every county are established by HUD. The FMR is the 40th percentile of gross rents (rent plus utilities). Housing and utility costs above the FMR cap are the responsibility of the tenant.

HUD Section 8 vouchers are administered by local public housing authorities. Ogden Housing Authority's (OHA) policies earmark a share of their vouchers for special needs populations: the elderly and disabled. Voucher holders represent four percent of total renter households in Utah.

Other Rent Assisted Programs. There are a number of special vouchers programs targeted for various classes of individuals: refugee vouchers, criminal justice vouchers, shelter+care vouchers, HOPWA (HIV/AIDS) vouchers, HARP (homeless) vouchers, HUD project-based vouchers, and state and county tenant-based rental assistance vouchers. OHA has 560 Project-Based Subsidized Housing units for very low-income renters. public housing units. And finally, the HUD Section 202 Supportive Housing for the Elderly includes perhaps another 500 units. This program provides assistance for the construction of new housing units. In total these "other" programs would add, at the most, another 5,000 units to the total number of rent assisted households in Utah. Source: Gardner Business Review, May 2018 "What Rapidly Rising Prices Mean for Housing Affordability, By James Wood, Dejan Eskic, and D.U. Benway.

In Ogden, there is high concentration of rent assisted households in census tracts of low to moderate opportunity. Some degree of the concentration is understandable, given that commercial amenities, access to transportation, and jobs are often located in low to moderate opportunity census tracts. Nevertheless, the high concentration of rent assisted households in low opportunity households is troublesome. Voucher holders live predominately in low opportunity areas and as the maps show 70 percent or more of tax credit units are located in very low to low opportunity census tracts. Weber County has a high concentration with 83 percent of tax credit units in very low opportunity tracts. Achieving a better spatial distribution of affordable rent assisted units should be a high priority for local housing policy-makers. Higher opportunity neighborhoods provide a significant advantage for children and their long-term education, employment, and economic outcomes. A recent article in the American Economic Review concludes that: "The Moving to Opportunity experiment generated substantial gains for children who moved to lower poverty neighborhoods when they were young. We estimate that moving a child out of public housing to a low poverty area...will increase the child's lifetime earnings by about \$302,000. Our findings suggest... moving to lower poverty area can reduce the intergeneration persistence of poverty."8 Programs to reduce intergenerational poverty. Source: Gardner Business Review, May 2018 "What Rapidly Rising Prices Mean for Housing Affordability, By James Wood, Dejan Eskic, and D.U. Benway.

Ogden Housing Authority has an 18-month waiting list for Section 8 vouchers

Section 8 Housing Choice Vouchers by Housing Authority

Housing Authority	Section 8 Vouchers	Years on Wait List
Beaver City	19	3 yrs
Carbon County	200	1-1.5 yrs
Cedar City	139	2 years
Davis County	940	2-3 yrs
Emery	91	2 years
Logan/Bear River	566	6-8 months
Myton City	33	NA
Ogden City	972	18 months
Provo City	883	1 year
Salt Lake City	2,325	5 years
Salt Lake County	2,493	5-6 years
Southeastern Utah	73	1 year
St. George	255	2-4 yrs
Tooele County	215	2 years
Utah County	1,059	NA
Weber County	124	5 years
West Valley City	531	4 years
Total	10,918	---

Source: Survey of public housing authorities

Source: Gardner Business Review, May 2018 [“What Rapidly Rising Prices Mean for Housing Affordability](#), By James Wood, Dejan Eskic, and D.U. Benway, Page 30.

The protected classes represent 60% of voucher holders in Weber County.

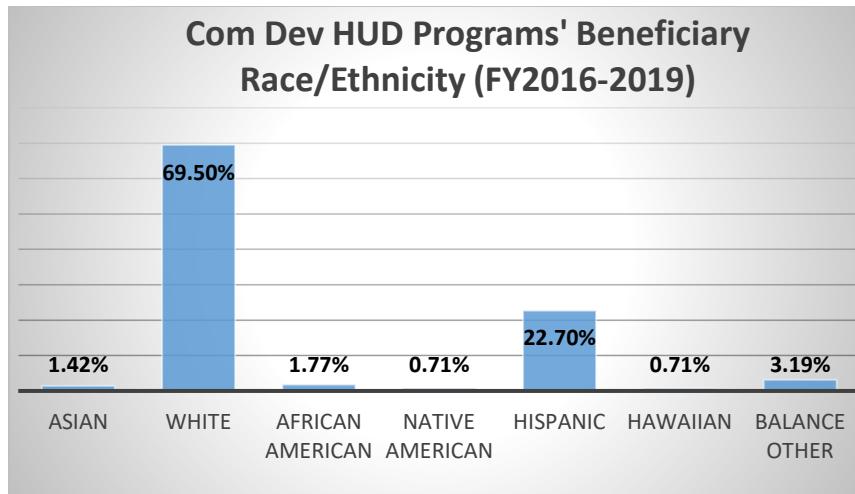
The protected classes represent about 60 percent of voucher holders in Weber County illustrating the high demand among protected classes for rental assistance. While the limited supply of vouchers is a federal funding and policy issue, all entitlement jurisdictions cities should understand the need and the shortfall for vouchers and develop mitigating strategies that will assist very low and extremely low-income renter households of protected classes.

A high percent of Weber County tax credit and deep subsidy housing units are located in Ogden. 76% (1,362 units) of tax credit units are located in Ogden and 89 percent (774 units) of deep subsidy HUD units are in Ogden.

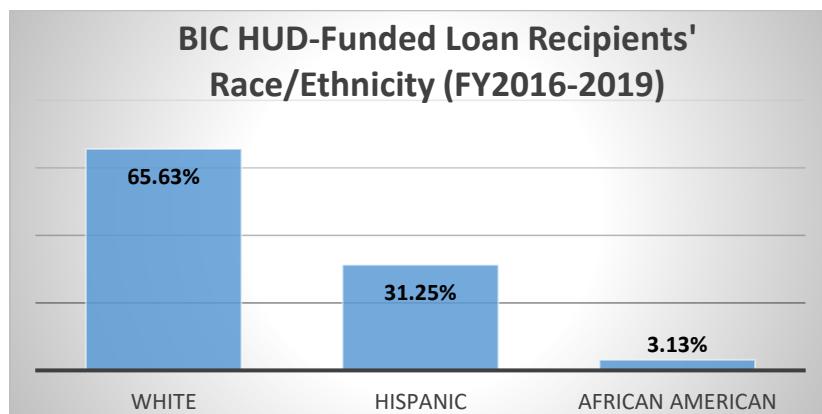
Ogden City Programs

In review of the Ogden City's HUD-funded programs, the city completed projects providing assistance to 282 program applicants since the last Five Year Consolidated Plan (Conplan). Community Development (Com Dev) completed 250 projects and Business Development (Bus Dev) completed 32 projects for the period (July 1, 2015 – June 30, 2019). The 282 program beneficiaries were of the following race/ethnicity: 69.5% white, 22.7% Hispanic, 0.71% Native American, 1.42% African American, 1.06% Hawaiian, 1.42% Asian and 3.19% Balance/Other.

The Community Development Division race/ethnicity of program participants: 196 Whites, 64 Hispanics, four Asian, five African American, two Native American, two Hawaiian and nine Balance/Other.



The Business Information Center (BIC) administers the Small Business Loan Program, Micro-enterprise loan program and Special Economic Development Projects. During the reporting period, the BIC provided assistance to Micro-enterprise business owners with the following race/ethnicity: 1 African American, 10 Hispanics and 21 Whites.



V. Housing Needs Summary

Incomes not keeping up with cost of housing.

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

Aging Housing Stock

Ogden's old housing stock, many are substandard, increases the need for housing rehab programs.

The majority of Ogden's housing stock is between 50 and 140 years in age. Smaller lot sizes between 3,400 square feet and 7,000 square feet are typical. Buildings have a wide range of square footages from old Victorian homes of 5,000 square feet on three levels to bungalows that have an 800 square foot footprint to rambler styles of 1,400 to 1,600 square feet. These varying building sizes provide options in sizes and price ranges to fit homeowner needs that many of the newer housing development designs do not. These older buildings have challenges due to the maintenance required for safe and livable conditions. Older single family homes also have a challenge in attracting owner occupants because of the mindset of some residents and marketers that newer homes have more appeal than older homes. Older building ages, especially for rental units, has also lead to a decline of necessary upkeep and maintenance that creates a safe and decent living environment. In Ogden the number of housing units increased by 2,700 units over the past ten years, a 9 percent increase in the inventory. Ninety percent of the housing inventory of Ogden City was built prior to 2000. The housing stock in Ogden is relatively old with a median age of 45 years. The "old" housing stock increases the need for programs that are targeted at addressing deferred maintenance, rehabilitation and improving energy efficiency. Source: Ogden City Moderate Income Housing Plan

Affordable Housing Needs and Protected Classes

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

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

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

Ogden has a high percentage of poverty because the city has the largest inventory of housing for the poor.

Another problem, Wood said, is a shortage of rental units that has created unhealthy, low-vacancy rates. For five years now, vacancy rates along the Wasatch Front have been below 5 percent, leaving renters with few options and nowhere to go if they can't afford rent hikes. Wood said in an interview with KSL. "They are really at the mercy of the landlord and the market," Wood said about renters. Since 2010, the ongoing building boom has added 30,000 new apartment units in Utah. Wood said that's helping a little with the shortage, but not with affordability. "The rental market will ease a bit, but I think long term it's going to be tight market," he said. "For affordable rental units there's going to be more demand than supply."

<https://www.ksl.com/article/46541867/unaffordable-utah-housing-crisis-hits-renters-hardest>

For affordable rental units there's more demand than supply.

There is a disparity in housing markets among cities within Weber County, with the lowest sales prices occurring in Ogden.

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

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

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

VI. Foreclosures and Evictions

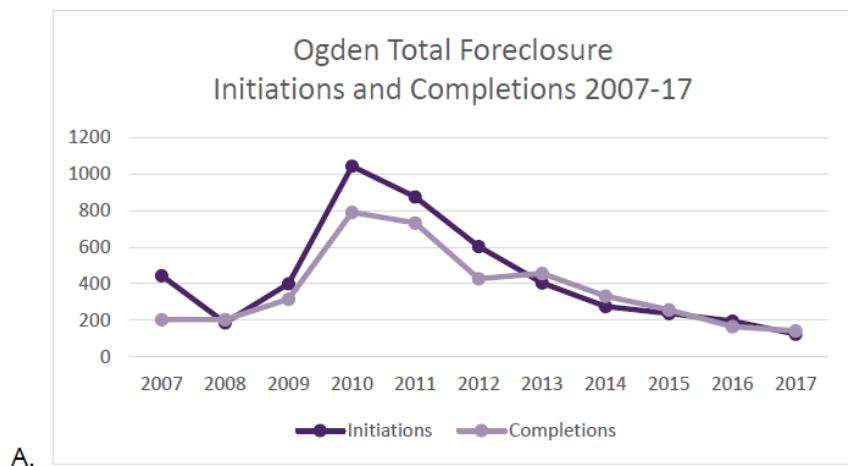
Figure 13 shows the annual number of foreclosure initiations and completions for properties in the city of Ogden from 2007 to 2017. The effect of the foreclosure crisis is clearly visible. Since 2015, foreclosure initiations and completions in Ogden have each hovered around 200 per year.

Ogden's foreclosure rate .5% of all households (owner and renter households)

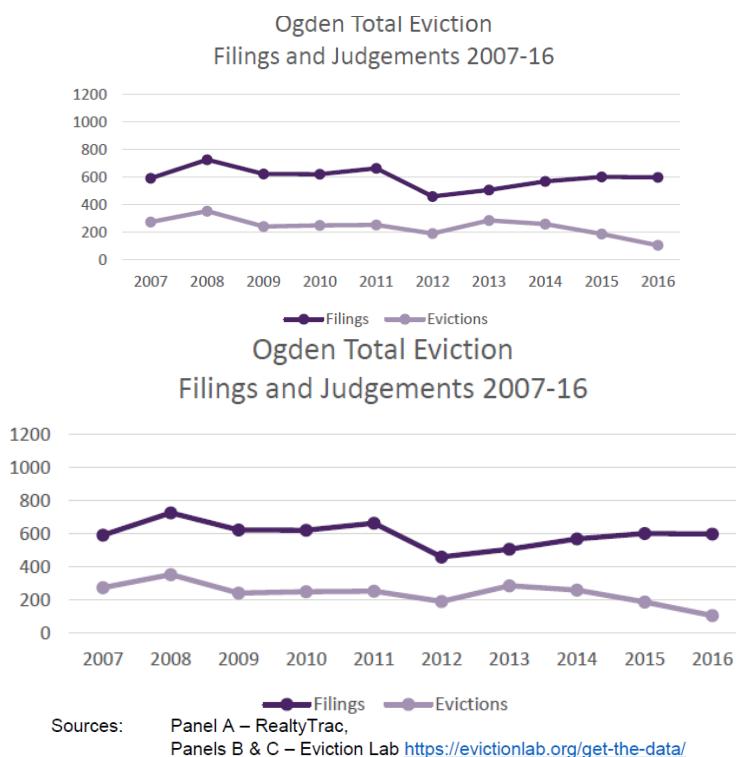
While there are a number of ways to calculate the foreclosure rate, for its national statistics, RealtyTrac calculates the foreclosure rate as a percentage of all households (including owner- and renter- occupied households with or without a mortgage.) According to this measure, Ogden initiation and completion rates peaked in 2010 at 3.2% and 2.4% respectively. In 2016, these rates were 0.6% and 0.5% respectively. Source: Housing Needs Assessment for Ogden and its East Central Neighborhood 2019, Prepared for OgdenCAN, Jennifer Gnagey, Ph.D.

Since 2015, approximately 200 foreclosures in Ogden per year

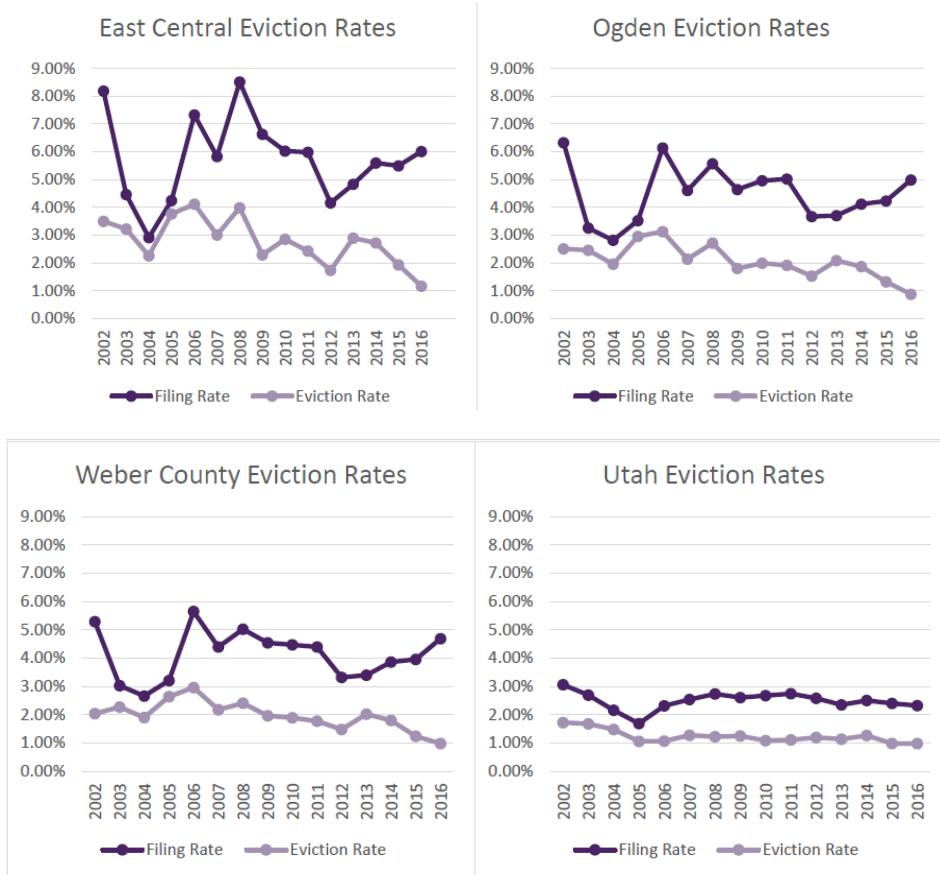
Figure 13. Ogden Foreclosure Initiations and Completions 2007-2017



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 eviction. As Matthew Desmond, author of “Evicted,” related in a National Public Radio interview, “That’s because, in the words of one landlord that I spent time with: you know kids cause us headache, you know, kids can destroy property or gain the attention of the police or an ambulance.”¹⁰ Source: Housing Needs Assessment for Ogden and its East Central Neighborhood 2019, Prepared for OgdenCAN, Jennifer Gnagey, Ph.D.



Eviction Filing and Judgement Rates 2002-2016



Sources: Eviction Lab <https://evictionlab.org/get-the-data/>, ACS

Between 2002 and 2016: “It is reasonable to conclude that foreclosure and eviction are problems of roughly comparable scale in Ogden, with eviction being slightly larger in more recent years, following the foreclosure crisis. Both problems seem to affect about 100 to 600 Ogden households per year.” Source: Housing Needs Assessment for Ogden and its East Central Neighborhood 2019, Prepared for OgdenCAN, Jennifer Gnagey, Ph.D.

VII. Policies and Practices

Public Policy, Zoning and Land Use Element

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

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

rental housing and low and very low-income households in Ogden and some of the cities in the south-end of the county.

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

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

Nimbyism, Zoning, and Land Prices

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

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

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

Review of potential gentrification

Steve Erickson, of the Crossroads Urban Center in Salt Lake City, has worked as a consultant and lobbyist for decades on poverty and housing issues. “In some communities you’ll see redevelopments target poorer neighborhoods, neighborhoods of color, and you’ll see it change to a cool neighborhood, with hip restaurants, condos, lofts,” he said. “Over time it pushes those folks of lesser means out.” To prevent large-scale gentrification, Erickson counsels deep mixed-use planning in redevelopment areas.

“In the older inner city, you have large segments of under-utilized, vacant, blighted areas,” Erickson said. The idea is to do “smart infill,” like the attractive low-income housing developments in east-central Ogden. “This promotes walkability, transit, mixed incomes,” he said. Ogden’s redevelopment approaches to date have followed these principles, Erickson said, which leads him to believe gentrification is not a worry. In fact, Ogden City’s Quality Neighborhoods plan, unveiled in 2015, included a section titled “It’s not gentrification.”

Erickson said some communities also “discriminate in a blanket way against affordable housing” through knee-jerk not-in-my-backyard, or “nimby” decisions. “It’s not been a problem in Ogden,” he said. “They are pretty inclusive. The nimbys are mostly in the newer suburbs.”

Transit Oriented Developments (TOD)

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

Ogden City’s Moderate Income Housing Plan

Ogden City has developed a Moderate Income Housing Plan

As required by Utah State Code 10-9a-408, Ogden has developed a moderate income housing plan: (a) made by the city to reduce, mitigate, or eliminate local regulatory barriers to moderate income housing; (b) actions taken by the city to encourage preservation of existing moderate income housing and development of new moderate income housing; (c) progress made within the city to provide moderate income housing, as measured by permits issued for new units of moderate income housing; and (d) efforts made by the city to coordinate moderate income housing plans and actions with neighboring municipalities.

Ogden’s general plan housing element includes these goals:

- expand the variety of housing types to meet the needs of a diverse community,
- encourage and support development of various housing types,
- disperse affordable housing and assisted housing to appropriate locations throughout Ogden,
- maintain and support programs that provide housing options for moderate income residents, and
- improve the quality of housing stock through better maintenance, upkeep and rehabilitation.

Local Legislative Review

Three distinct legislative revisions have been made to Ogden’s zoning code in the last few years to help reduce potential barriers to moderate-income housing.

Removing of lot area requirements that determine housing density in the CBD and CBDI zones. This allows 4.8% of the land area that allows residential development to let physical design and market conditions determine the number of housing units that can be developed on a parcel of land.

Reducing the parking requirements for residential units that are either in the CBD, within a block from the CBD zone or within a block from a transit stop anywhere in the City. The reduction was from 2 stalls per unit to 1.5 stalls per unit. This parking reduction equates to roughly a \$4,000 cost savings per every two units constructed.

Accessory Dwelling Units (ADU) allowed in all residential zones. Ogden had allowed ADU's since 2008 but the process was streamlined in 2015 removing the requirement of a general plan amendment to create an area specific ADU overlay zone. The amendment would cost a petitioner \$1,500 and take up to six months before the request was approved for a neighborhood in the city. Now an accessory dwelling license is applied for at a cost of \$83 and approved within 15 minutes. It is now a right by use and not an overlay zone. This type of housing provides a potential for housing an additional 11,000 persons in the future.

Housing Development Fees

Ogden did review the total fees that take place to develop in the city and compared that with some other Weber County governments. Ogden charges the total lowest fees in the county since there are no impact fees collected for the city from new development.

Language Assistance Plan and Fair Housing Infrastructure

The absence of language access plans and the availability of language interpreters in the fair housing offices of entitlement jurisdictions disproportionately impacts minorities, ethnic populations, and immigrants. Ogden's fair housing infrastructure is one of the most complete of any city in the Wasatch Front. However, the fair housing website is only in English. The city does provide language interpreters. Source: Weber County Fair Housing Equity Assessment, BEBR, May 2014.

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

VIII. Legal Status / Fair Housing Complaints

Utah Antidiscrimination and Labor Division

The Utah Antidiscrimination and Labor Division data on discrimination complaints also includes complaints made to HUD. Over the past five years, 22 complaints from Ogden residents have been filed see *Table below*. Forty-six percent of these complaints were based on discrimination due to disability. Disability leads all categories in perceived reason or basis for the complaint followed by retaliation at 19 percent, These data raise concerns that discrimination is impeding fair housing choice for households with disabled individuals.

46% of FH complaints from Ogden residents on the basis of disability

Utah Anti-discrimination and Labor Division (UALD)
Ogden Fair Housing Complaints Filed and Status 2014 - 2018

Basis of Complaint		Case Status	
Color	1	Legal (sent to Legal unit for Cause Finding)	1
Disability Mental and/or Physical	10	Closed: Compliance Complete	2
Race – Black	2	Closed: Dismissed for lack of jurisdiction	1
Race – White	1	Closed: No cause determination	6
Retaliation	4	Closed: Reconsideration Order - Denied	2
Sex-Female sexual harassment	2	Closed: Withdrawal by complainant after resolution	2
Sex- Male	1	Request for reconsideration received	1
Source of Income	1		
Total	22	Total	15

Disability Law Center

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

The Disability Law Center provides Fair Housing advocacy for all the protected classes and Fair Housing testing. A summary of the persons calling in for assistance is below. The Disability Law Center also fields calls regarding housing discrimination. Their data does not show the basis of the discrimination. In four years (2016-2019) 107 individuals in Weber County filed complaints regarding housing discrimination.

Although details were not provided for the basis of the complaint, it can be postulated that many white complainants called were of Hispanic ethnicity or called on the basis of disability. For the most part, fair housing testing in Ogden revealed signs of discrimination against sexual orientation and source of income (a Utah state protected class) and other results were not conclusive.

Fair Housing Testing Results in Ogden
by Disability Law Center (DLC) by Client Race:

Complaint type	Analysis	
National Origin	Inconclusive	1
Disability	No signs	4
Sexual Orientation	Signs	1
National Origin	No signs	2
Source of Income	Signs	1
Familial Status	Inconclusive	1

Fair Housing calls received at Disability Law Center (DLC)
by Client Race and Services Provided (2016 – 2019):

Client Race		Services Provided	
American Indian / Alaskan	2	Information and referral	65
Black/African American	3	Short-term assistance	17
Chicano	1	Representation at a meeting	5
Native Hawaiian/Pacific Islander	1	Representation at a hearing	4
White	93	Legal Clinic	14
Not selected	7	Technical assistance	2
	TOTAL 107		TOTAL 107

Reasonable Accommodations for the Disabled

The number of disabled individuals in Ogden City is estimated by the American Community Survey, U.S. Census Bureau to be 10,837 individuals, about 13 percent of the population. Under the Fair Housing Act housing providers must make “reasonable accommodations in rules, policies practices, or services when such accommodations may be necessary to afford a person with a disability the equal opportunity to use and enjoy a dwelling.” In May 2014, it was estimated that over one-third of all rental housing in Weber County is a detached single family unit. Many of the landlords who are renting homes or small “mom and pop” housing providers are not aware of the full implications of the Fair Housing Act and the “reasonable accommodations” provision. The Fair Housing infrastructure in all cities has not systematically addressed the education of landlords regarding “reasonable accommodations.”

IX. Private Policies and Practices: Lending

Homeownership and housing stability is one dimension of housing opportunity that can be assessed using Home Mortgage Disclosure Act (HMDA) data to examine mortgage loan application outcomes. Disparities in homeownership across racial and ethnic lines may reflect symptoms of underlying impediments in the home mortgage application process.

In May 2014, the Weber County Regional Analysis of Impediments to Fair Housing Choice (RAI) prepared by Bureau of Economic and Business Research U of U (BEBR) reported that Hispanics in Ogden were twice as likely to be denied a mortgage than whites (*source: HMDA LAR Raw Data by MSA (2006–*

2011). Ogden City Community Development (Com Dev) questioned the validity of this statement. Com Dev reached out to BEBR but did not get a response. Com Dev could not verify or replicate the findings reported by BEBR.

To better understand the percentage of Hispanics compared to whites in obtaining mortgage loans, Com Dev downloaded and compiled HMDA data for Ogden City for five years (2013-2017). Professor Jenny Gnagey at Weber State University (WSU) assisted in the data analysis. For comparative purposes, non-Hispanic applicants were compared with Hispanic/Latino applicants for metrics derived from the HMDA data. In total 26,359 persons applied for a mortgage loan: 3,507 Hispanics, 5,273 Non-specified and 17,579 Non-Hispanics applied for mortgages loans in Ogden between 2013-2017. Of the 3,507 Hispanics that applied for a mortgage, 2,162 applicants (61.8%) were successful and 1,345 Hispanic applicants (38.4%) were unsuccessful. Of the 17,579 Non-Hispanic applicants 11,922 (67.8%) were successful, and 5,657 (32.2%) were unsuccessful. Also, 5,273 mortgage applicants chose not to specify race and ethnicity. Of the 5,273 non-specified applicants, 4,172 (79%) were successful in obtaining a mortgage loan and 1,101 (21%) were not successful. In the HMDA data 2013-2017, Hispanics had 6% higher denial rate than non-Hispanics. This is far less than 50% as reported in May 2014.

Conventional Loan Mortgage Applications in Ogden City 2017

	# Loan Applications	# Hispanic	% Hispanic	# Non-Hispanic	% of Non Hispanic	Non Specified	% of Non Specified
Loans originated	4,233	583	61.8%	2,733	67.9%	917	78.0%
Loans not originated	1,908	360	38.2%	1,290	32.1%	258	22.0%
Total of all applications	6,141	943	15%	4,023	66%	1,175	19%

Ogden City - 2013-2017

Action Taken by Lender	# of Applications	Hispanic or Latino	Not Hispanic or Latino/White	Not Hispanic or Latino/Black or African American	Not Hispanic or Latino/Asian	Not Hispanic or Latino/American Indian	Not Hispanic or Latino/Native Hawaiian or Other Pacific Islander
Loan originated	18,256	2,162	11,480	155	174	51	61
Loan not originated	8,103	1,345	5,422	100	163	65	63

	Qty	Hispanic	% of Hispanic	Non Hispanic	% of Non Hispanic	Non Specified	% of Non Specified
Loans originated	18,256	2,162	61.6%	11,922	67.8%	4,172	79.1%
Loans not originated	8,103	1,345	38.4%	5,657	32.2%	1,101	20.9%
Total of all applications	26,359	3,507	13%	17,579	67%	5,273	20%

Source: HMDA data for Ogden City for five years (2013-2017).

HMDA does not require lenders to document reasons for denial. The most common reasons for Hispanic applicants to be denied a mortgage are poor credit, lack of credit history, and incomplete application process. HMDA data does not reveal conclusively the reasons behind the denied mortgage applications.

In review of 2013-2017 HMDA data, the data does not support the theory that 'Hispanics experience a significantly higher denial rate for home mortgages, which suggests a financial impediment to fair housing choice for Hispanics.' (as reported in the Weber County RAI May 2014). Com Dev will continue to monitor HMDA data to postulate if private lending institutions are creating barriers for protected classes in obtaining mortgages.

X. Impediments to Fair Housing Choice and Action Steps

As a recipient of HUD CDBG and HOME Entitlement funds, the City is committed to Affirmatively Further Fair Choices for all residents. Ogden's Racially Concentrated Areas of Poverty may have direct and substantial impact on fair housing choice, affecting a large population of minority residents. The NRSA is an important tool, providing the city a means to direct resources to areas with low opportunity which are characterized by high poverty, high proportion of rental housing, unemployment and low educational attainment. This AI has provided an assessment of Ogden's population demographics, RCAPs, employment trends, housing market conditions, educational attainment, housing needs, foreclosures and evictions, and private lending practices, which provides a framework to identify impediments to fair housing choice and corrective actions.

Although many issues that affect fair housing choice have been identified, the city is limited in resources and ability to impact all areas. The City adopts the following impediments which may have a direct and substantial impact on fair housing choice and are within the City's ability to impact.

The City of Ogden's Analysis of Impediments to Fair Housing Choice for ConPlan 2020-2025 has identified the following impediments, as well as defined specific goals and strategies to address each impediment.

IMPEDIMENT 1

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

Goal: Provide consistent and even Fair Housing services, outreach and support to all citizens and program applicants.

ACTION ITEMS

1. Utilize the City's **Language Assistance Plan (LAP)**. **Expand Ogden's HUD-funded programs' outreach** to include Spanish translation and outreach to Spanish-speaking citizens, Ogden's largest minority group. Federal policies under Title VI of the 1964 Civil Rights Act set benchmarks by which jurisdictions like Ogden must assure meaningful access to federally funded services. Under guidelines issued by the HUD, cities that receive CDBG and HOME program funds, are required to evaluate the need for language assistance services by individuals with Limited English Proficiency (known as LEP individuals). The LAP identifies ways in which language assistance will be provided – thereby outreaching effectively to the LEP community regarding Fair Housing Choice, as well as, other City services.
2. Partner with the Utah Hispanic Chamber in Ogden to promote Ogden's HUD funded programs to the Hispanic community.
3. Translate the City's **Fair Housing webpage** and vital HUD-funded program documents in Spanish; and print from HUD's website and make available informational pamphlets and Fair Housing brochures for LEP individuals.
4. Continue to provide citizens with consistent **Spanish translation services**. Utilizing a private contractor to test and certify employees, so that quality translation services are available to LEP individuals.
5. Establish a centralized list of resources for assisting LEP individuals, by utilizing the City's Intranet. Posting the LAP and a list of City employees who are certified interpreters on the City's Intranet will assist in consistent and even Fair Housing infrastructure, as well as, consistent access to City programs.

IMPEDIMENT 2

Deteriorating Quality of Housing Inventory in RCAPs- Ogden's housing stock is aging in Ogden's NRSA. This along with the prevalence of low-income households and minority concentrations in the NRSA, presents the challenge of deferred maintenance and deteriorating quality of housing stock. Homes in the East Central and NRSA particularly, are disproportionately occupied by minority individuals. There is a relatively high probability these homes are subject to deferred maintenance and deteriorating quality. Programs to rehabilitate, renovate, and repair structures and/or improve energy efficiency would affirmatively further fair housing.

Goal: De-concentrate low-income housing and provide quality housing options in RCAPs, so all people have access to quality homes in the neighborhood of their choice.

ACTION ITEMS

1. **Engage the State** and local Weber County communities to develop solutions that end the concentration of low-income housing in Ogden. De-concentration of low-income housing and poverty in Ogden.

2. **Expanding the City's NRSA** to include Census Tract 2018, a newly identified RCAP in Ogden. The NRSA is encouraged by HUD and provides cities with incentives that encourage the investment of resources in RCAPs.
3. Implement **Quality Neighborhoods Program** to target resources to improving the condition of housing in the NRSA. Quality Neighborhoods works towards providing additional housing options, and when possible, developing new quality housing available to LMI and moderate-income households in the NRSA, to improve overall housing conditions through the reduction and elimination of substandard housing, to provide more price diversity, to encourage life cycle housing options, and to de-concentrate poverty. Newly constructed housing units will be built with three bedrooms and when possible with basements to accommodate larger families. Due to the high water table in some areas basements are not always an option.
4. **Partner with local lenders** and non-profit groups and social 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 RCAP Census Tracts.
5. Continue to implement HUD's **Asset Control Area (ACA)** program to improve the quality of housing in Ogden's high minority and high poverty East Central neighborhoods. The ACA is a HUD program that, as an ACA program participant, HUD will first make FHA-foreclosed properties (in a designated target area) exclusively available to the city at a 50% discount. This discount provides the city the means to undertake the substantial rehab needed to bring the home up to quality standards.
6. Provide assistance for housing rehabilitation to all income levels through the **Home Exterior Loan Program (HELP)**. The HELP program provides a low interest loan to homeowners in need of exterior repairs and repairs to address housing code issues, improving the quality of housing in Ogden.
7. The City maintains a comprehensive **infrastructure plan** which has an infrastructure replacement schedule that bonded for significant improvements in the NRSA area over the next decade. When infill projects require consolidation of properties, infrastructure improvements are included and implemented when possible in the project.

IMPEDIMENT 3

Weak Job-Transit Connections - Throughout the community engagement process, one area that was identified as impacting housing choice and access to employment resources was transportation. Participants noted the need for better connectivity with efficient and consistent service between the Weber State University (WSU) campus, the McKay-Dee Hospital and downtown Ogden. HUD's job proximity index shows low index values in five of Ogden's NRSA census tract areas that have a minority population of 50% or greater. While funding limitations may inhibit the ability to increase bus service to low index census tract block groups, the City can consider other avenues for providing a transit connection between the NRSA and employment centers such as McKay-Dee Hospital, WSU and downtown.

Goal: Provide improved transportation connections and greater connectivity to employment centers, shopping, schools, recreation opportunities and to the regional transit system.

ACTION ITEMS

1. Complete a **Transportation Master Plan** that identifies the City's transportation needs and deficiencies and addresses the creation of a transportation network that includes auto, freight improvements, transit improvements, pedestrian improvements and wayfinding element.
 - a. Improved bicycle infrastructure to increase transportation options. Consider integrating bicycle routes and infrastructure with BRT station design, install bike racks, add bike lanes, and add GREENbikes in the city.

2. Implement a **Bus Rapid Transit (BRT)** line that increases mobility, connectivity and travel choices between downtown Ogden and the WSU/McKay-Dee Hospital area. BRT and other TOD's to provide fast, accessible, consistent, cost-effective services that help people travel to schools and jobs.
 - a. Locate **BRT stop locations** that build complete neighborhoods with access to jobs, housing and essential services.

IMPEDIMENT 4

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

Goal: Increase Fair Housing education to address the education of landlords regarding “reasonable accommodations”.

ACTION ITEMS

1. **Review the Good Landlord curriculum** to ensure it adequately addresses the Fair Housing Act and particularly the Reasonable Accommodations requirements for landlords.
2. Work with state agencies and DLC to **promote fair housing** educational opportunities.
3. Work with the Utah Apartment Association's to **increase attendance at Fair Housing Tradeshow**.
4. **Promote April as Fair Housing Month** to increase the public's awareness of the Fair Housing Act. Display posters at City offices and provide posters to partners.
5. **Utilize the FHEO logo** in City documents to raise awareness of Fair Housing.
6. Provide citizens with fair housing information utilizing the Fair Housing and Housing Affordability outreach flyers (pages 48-49)

IMPEDIMENT 5

High Rate of Evictions and Foreclosures in Ogden City's NRSA and East Central neighborhood. Areas with minority concentration have had higher foreclosure and eviction rates than other areas of the city and Weber County. This indicates that the recent housing market crisis has impacted minority communities at a disproportionately high rate.

Goal: Support the rebalance of power so tenants are not forced to choose between housing quality and housing stability.

ACTION ITEMS

1. **Partner with OgdenCAN and Disability Law Center** to provide education on renters' rights.
2. **Support OgdenCAN** to help tenants resolve disputes, and free assistance to Odgen's most vulnerable renters facing eviction.
3. **Support agencies that advocate** at the state legislature for tenant rights.

4. Work with OgdenCAN to **identify members of the protected classes** that may be experiencing housing discrimination and educate them on their rights.
5. **Promote renters advocacy groups** and when necessary refer them to the Disability Law Center and/or Utah Anti-discrimination and Labor Division for legal counsel.
6. **Allocate funding to the NRSA neighborhoods with high foreclosure rates** to improve infrastructure and to encourage economic development.
7. Offer down payment assistance and home rehab loans in the NRSA to address the housing quality standards.
8. Encourage housing developers (nonprofit and for-profit) to purchase and **rehab foreclosed properties.**

XI. Signature for the City of Ogden

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

Mayor, Michael P. Caldwell

Date

XII. General Data Tables, Maps and Figures

Assisted Housing

Subsidized Housing - Weber County - 2019					
Program/Project	Address	City	East	No. Vouchers/ Subsidized Units	Target Population (if Applicable)
Tenant-Based Housing Choice Vouchers (Section 8)					
Ogden Housing Authority (OHA)		Weber County	x	943	
Weber Housing Authority (WHA)		Weber County	x	146	
Subtotal				1089	
Tenant-Baser Vouchers (Other HUD Programs)					
OHA Shelter Plus Care		Weber County	x	35	Homeless with disability
OHA Mainstream Vouchers		Weber County	x	28	Disabled
OHA HUD VASH (Veterans Affairs Supportive Housing)		Weber County	x	61	Homeless veterans
OHA HOPWA (Housing Opportunities for Persons with AIDS)		Weber County	x	5	Homeless with AIDS
WHA Shelter Plus Care		Weber County	x	4	Homeless with disability
WHA Permanent Supportive Housing		Weber County	x	24	Homeless with disability
Subtotal				157	
Public Housing (Section 8)					
Apple Grove	1333 Grant Ave	Ogden		28	
Galloway	2522-2536 D Ave	Ogden		12	
Kimi	663 22nd St	Ogden	x	24	Elderly (55+) or disabled
Lincoln Manor	608-610 Lincoln Ave	Ogden		32	
Lomond Gardens	550 Grant Ave	Ogden		76	Elderly (55+), or disabled
Sierra	235-251 28th St/2865 Childs	Ogden		28	
Subtotal				200	
Subsidized Housing - Weber County - 2019					
Program/Project	Address	City	East	No. Vouchers/ Subsidized Units	Target Population (if Applicable)
Project-Based Subsidized Housing (Sections 8, 202, 811, & Mod Rehab, excluding section 42 Low Income Housing Tax Credit LIHTC)					
BRAMWELL COURT	2625 Gramercy Ave	Ogden	x	18	Disabled
Browning Apartments	2703 Washington Ave	Ogden		15	
FELLOWSHIP MANOR	2334 Monroe Blvd	Ogden	x	86	Elderly
FONTENELLE APTS	2465 MONROE BLVD	OGDEN	x	10	
GOLDEN LINK MANOR	1132 24th St	Ogden	x	30	Elderly
GRAHAM COURT	230 32nd St	Ogden		14	Disabled
NORMANDIE	610 1st St	Ogden		30	
OGDEN SENIOR VILLA	3158 Lincoln Ave	Ogden		32	Elderly
OSMOND HEIGHTS APTS	630 23rd St	Ogden	x	24	
PARKWOOD APTS	120 Dan St	Ogden		20	
REVELLE APTS	2485 MONROE BLVD	OGDEN	x	12	
THE VILLAGE SQUARE	607 E 625 S	Ogden		80	
THREE LINK TOWERS	2427 Jefferson Ave	Ogden	x	121	Elderly
UNION GARDENS	468 3rd St	Ogden		50	Elderly
VILLAGE II APARTMENTS	492 14th St	Ogden		18	
Subtotal				560	

Subsidized Housing - Weber County - 2019					
Program/Project	Address	City	East Central	No. Vouchers/ Subsidized Units	Target Population (if Applicable)
Section 42 Low Income Housing Tax Credit LIHTC Only					
COUNTRY WOODS APTS.	525 Park Boulevard	Ogden		167	
ELMHURST APTS.	2432 Van Buren Avenue	Ogden	x	15	Homeless
FAIRVIEW APTS.	526 2700 Street	OGDEN	x	32	
HAVEN POINTE	2265 South 1100 West	West Haven		168	
HOOVER APTS.	330 East 27th Street	Ogden		23	
IMAGINE JEFFERSON	550 East 25th Street	Ogden	x	50	
IMAGINE JEFFERSON II	2444 Adams Ave.	Ogden	x	83	Homeless
KINGSTOWNE APTS.	2245 Monroe Blvd	OGDEN	x	48	
LIBERTY JUNCTION APTS.	2353 Junction Way	Ogden		65	
LOMOND VIEW RETIREMENT APTS	620 Grant Avenue	Ogden		38	Elderly homeless or elderly disabled
LORIN FARR CROWN	1183 22ND ST	OGDEN	x	13	
MADISON MANOR APTS.	2434 Madison Avenue	OGDEN	x	46	
	810 25th Street	OGDEN	x	55	
MOUNT EYRIE APTS	1225 N 454 E	OGDEN		38	
MOUNTAIN GLEN APTS.	5725 Wasatch Drive	South Ogden		66	Elderly
MOUNTAIN VIEW APTS	563 W 24TH ST	OGDEN		30	
MT. OGDEN SENIOR HOUSING	1450 Laurel Drive	Ogden		48	Elderly
PEERY APTS	2461 ADAMS AVE	OGDEN	x	14	
RIDGEVIEW APTS.	710 North Washington	Ogden		79	
ROYAL HOTEL	2522 Wall Avenue	Ogden		22	Mental illness
TAMLYN APTS.	1121 Sullivan Road	OGDEN		35	
THE STATION AT PLEASANT VIEW	1109 W. Spring Valley Lane	Pleasant View		64	
THE STATION AT PLEASANT VIEW II	1148 West Spring Valley Dr.	Pleasant View		64	
VALENCIA	461 27th Street	OGDEN	x	122	
VICTORIA RIDGE RETIREMENT	1024 Childs Avenue	Ogden		48	Elderly
VILLA SOUTH APTS.	3757 South Grant Avenue	South Ogden		120	
VILLAGE SQUARE RETIREMENT	545 Jefferson Ave	OGDEN		80	Elderly
WASHINGTON PARK APTS.	170 N. Washington Blvd.	Ogden		84	
Subtotal				1717	

Subsidized Housing - Weber County - 2019					
Program/Project	Address	City	East Central	No. Vouchers/ Subsidized Units	Target Population (if Applicable)
Project-Based Subsidized Housing combined with LIHTC					
BRAMBLEWOOD APTS.	174 E. Dan Street	OGDEN		68	
COUNTRYSIDE APTS.	650 North Washington Blvd.	OGDEN		72	
EVERGREEN APTS	3455 IOWA AVE	OGDEN		30	
GARDEN GROVE APTS	1155 E. 23rd Street	Ogden	x	20	Elderly
HERITAGE HOUSE APTS.	277 East 5000 South	Washington Terrace		34	Elderly
KARA MANOR APTS.	4940 South 425 West	Washington Terrace		43	
RL COURTS APARTMENTS	511 Gramercy Avenue	Ogden		63	Elderly
SEAN HERRICK APARTMENTS	194 25th Street	Ogden		86	Homeless
ST. BENEDICT'S MANOR I	3000 Polk Avenue	OGDEN		100	Elderly
ST. BENEDICT'S MANOR II	1469 Darling Street	Ogden		40	Elderly
Subtotal				556	
GRAND TOTAL				4279	
Total Income-Based Subsidies				2006	

Source: Jennifer Gnagey, OgdenCAN January 2019.

Population and Demographics

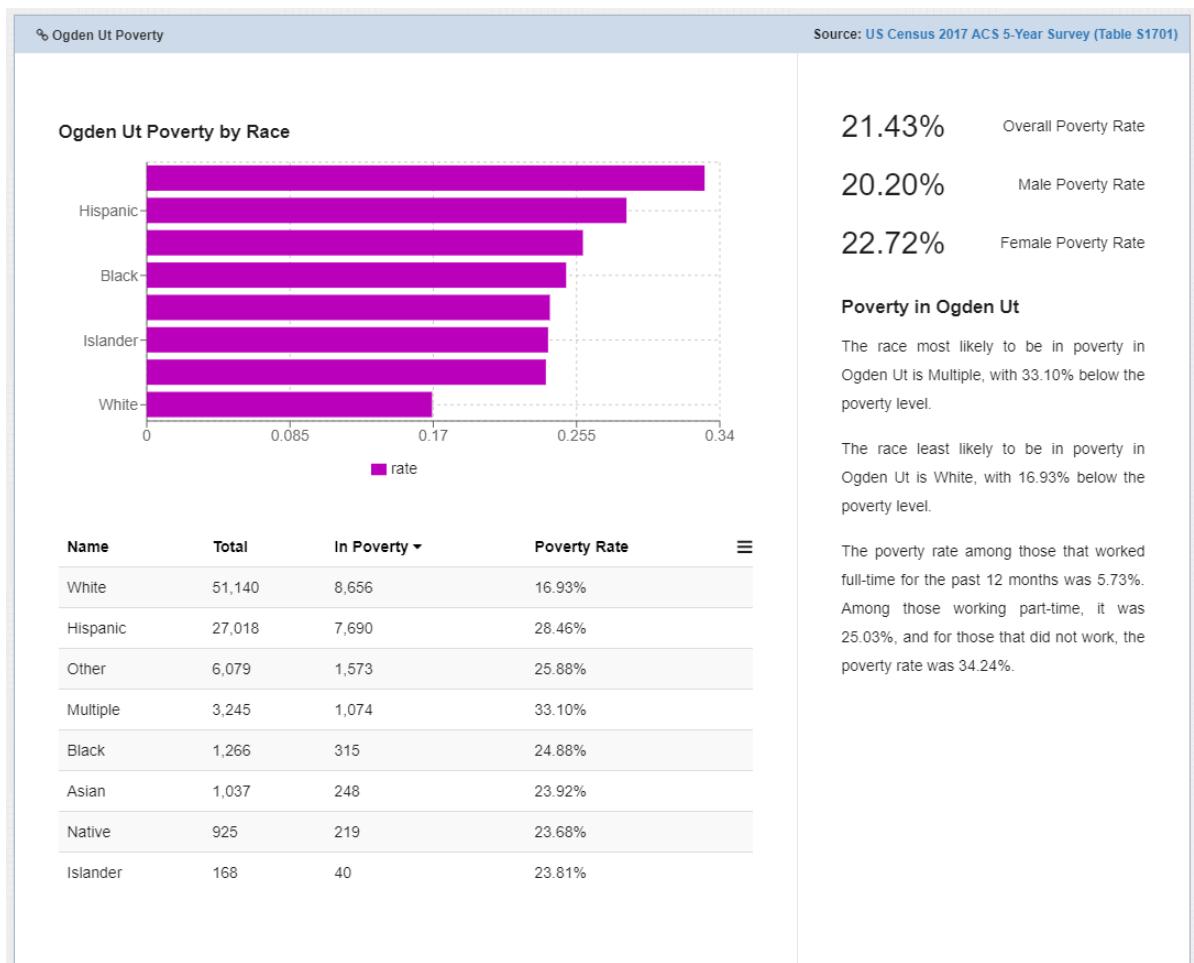
	Ogden city, Utah	United States
Population estimates, July 1, 2018, (V2018)	87,325	327,167,434
Population		
Population estimates, July 1, 2018, (V2018)	87,325	327,167,434
Population estimates base, April 1, 2010, (V2018)	82,838	308,758,105
Population, percent change - April 1, 2010 (estimates base) to July 1, 2018, (V2018)	5.4%	6.0%
Population, Census, April 1, 2010	82,825	308,745,538
Age and Sex		
Persons under 5 years, percent	▲ 8.5%	▲ 6.1%
Persons under 18 years, percent	▲ 27.0%	▲ 22.4%
Persons 65 years and over, percent	▲ 10.3%	▲ 16.0%
Female persons, percent	▲ 48.4%	▲ 50.8%
Race and Hispanic Origin		
White alone, percent	▲ 84.8%	▲ 76.5%
Black or African American alone, percent (a)	▲ 1.6%	▲ 13.4%
American Indian and Alaska Native alone, percent (a)	▲ 1.1%	▲ 1.3%
Asian alone, percent (a)	▲ 1.2%	▲ 5.9%
Native Hawaiian and Other Pacific Islander alone, percent (a)	▲ 0.2%	▲ 0.2%
Two or More Races, percent	▲ 3.9%	▲ 2.7%
Hispanic or Latino, percent (b)	▲ 32.3%	▲ 18.3%
White alone, not Hispanic or Latino, percent	▲ 61.5%	▲ 60.4%

<https://www.census.gov/quickfacts/fact/table/ogdencityutah,US/PST04521>

Table Persons with Disability

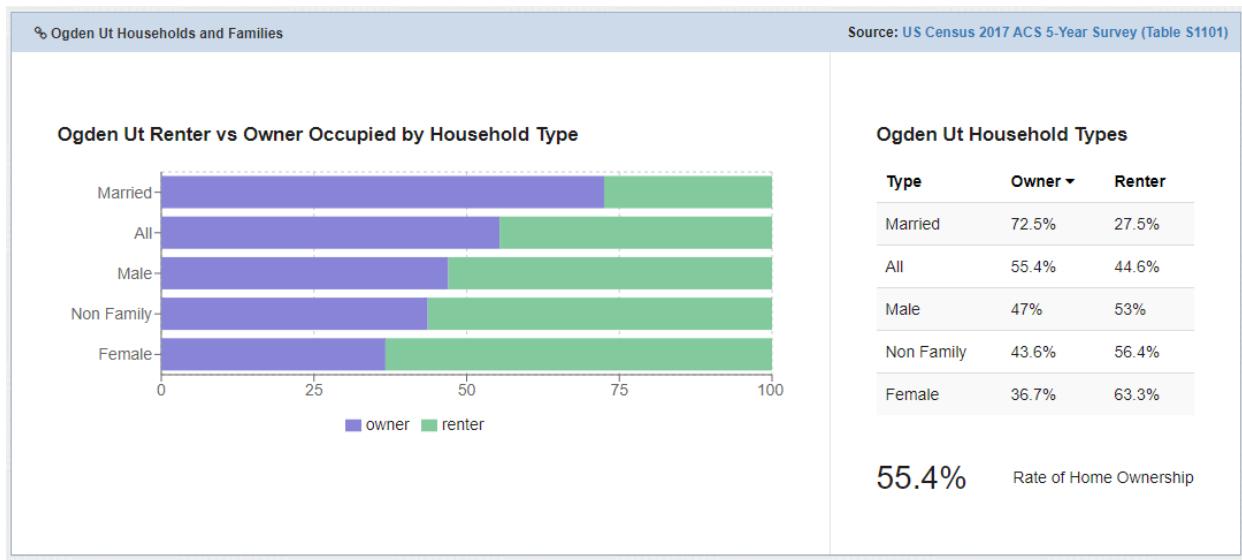
Ogden City, Utah			
AGE	Total	# Persons with Disability	% persons with disability
Under 5 years	6,988	307	4.4%
5 to 17 years	16,858	1,125	6.7%
18 to 34 years	23,005	1,740	7.6%
35 to 64 years	28,716	5,626	19.6%
65 to 74 years	6,019	2,046	34.0%
75 years and over	3,237	1,666	51.5%

Source: U.S. Census 2013-2017



Population estimates base, April 1, 2010, (V2018)	82,838	308,758,105
Health		
With a disability, under age 65 years, percent, 2013-2017	10.1%	8.7%
Persons without health insurance, under age 65 years, percent	△ 18.9%	△ 10.0%
Economy		
In civilian labor force, total, percent of population age 16 years+, 2013-2017	64.1%	63.0%
In civilian labor force, female, percent of population age 16 years+, 2013-2017	60.1%	58.2%
Total accommodation and food services sales, 2012 (\$1,000) (c)	123,974	708,138,598
Total health care and social assistance receipts/revenue, 2012 (\$1,000) (c)	889,181	2,040,441,203
Total manufacturers shipments, 2012 (\$1,000) (c)	3,135,084	5,696,729,632
Total merchant wholesaler sales, 2012 (\$1,000) (c)	949,294	5,208,023,478
Total retail sales, 2012 (\$1,000) (c)	1,121,790	4,219,821,871
Total retail sales per capita, 2012 (c)	\$13,388	\$13,443
Transportation		
Mean travel time to work (minutes), workers age 16 years+, 2013-2017	20.3	26.4
Income & Poverty		
Median household income (in 2017 dollars), 2013-2017	\$43,361	\$57,652
Per capita income in past 12 months (in 2017 dollars), 2013-2017	\$21,357	\$31,177
Persons in poverty, percent	△ 21.4%	△ 11.8%

Housing



Source: HUD Regional Housing Market Data 2nd Quarter 2019, Region 8.

Chart 22: Percent Increase in Rental Rates in Wasatch Front Counties, 2018

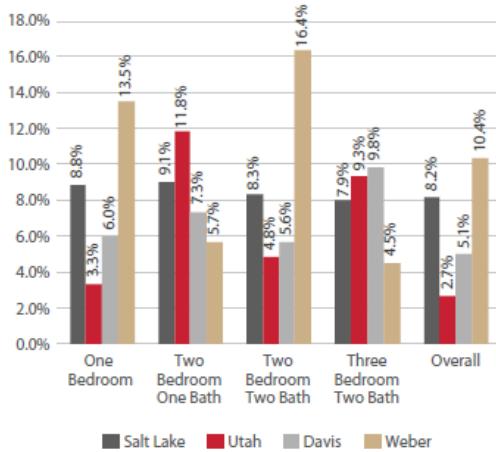
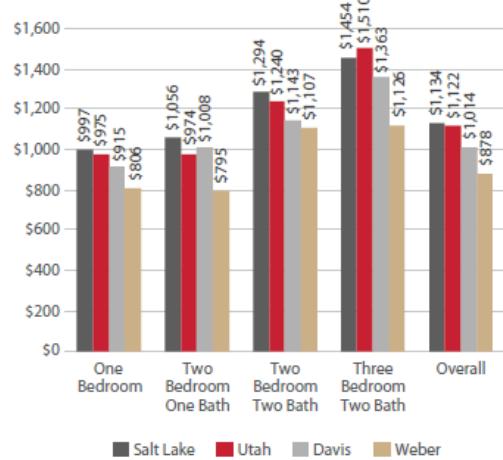


Chart 23: Rental Rates by Type of Unit in Wasatch Front Counties, 2018



Source: 2018 Greater Salt Lake Area Multifamily Market Report, CBRE.

Employment

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Largest Industries	Average Employment	Establish -ments	Share of Employment	Average Annual Wage
Manufacturing	14645	303	13.3%	\$ 58,296.00
Health Care and Social Assistance	13854	780	12.6%	\$ 48,624.00
Retail Trade	12564	744	11.4%	\$ 30,528.00
Education Services	11249	147	10.2%	\$ 32,952.00
Public Administration	9614	130	8.7%	\$ 49,728.00
Admin, Support, Waste Mgmt, Remediation	8355	389	7.6%	\$ 27,828.00
Accommodation and Food Services	7813	425	7.1%	\$ 15,168.00
Construction	6748	875	6.1%	\$ 53,592.00
Professional Scientific, Technical Services	4958	675	4.5%	\$ 55,608.00
Finance and Insurance	4843	354	4.4%	\$ 56,340.00
Wholesale Trade	3650	268	3.3%	\$ 52,884.00
Transportation and Warehousing	3403	179	3.1%	\$ 46,476.00
Arts, Entertainment, and Recreation	2755	94	2.5%	\$ 17,124.00
Other Services (except Public Admin.)	2750	415	2.5%	\$ 31,620.00
Real Estate and Rental and Leasing	912	354	0.8%	\$ 36,156.00
Information	841	74	0.8%	\$ 44,448.00
Management of Companies	414	41	0.4%	\$ 85,716.00
Agriculture, Forestry, Fishing & Hunting	383	21	0.3%	\$ 62,532.00
Utilities	341	25	0.3%	\$ 69,732.00
Mining	38	8	0.0%	\$ 59,436.00

HOUSING AFFORDABILITY



This data is provided to assist in planning and developing strategies to Affirmatively Further Fair Housing choice.

Housing Problems

HUD provides Housing Problems data to cities to demonstrate the extent of housing needs in the community, particularly for low income households.

HUD Defined

Housing Problems are:

1. Incomplete kitchen facilities; and
2. Incomplete plumbing facilities; and
3. More than 1 person per room; and
4. Cost burden over 30% of household income to housing.

Severe Housing Problems:

1. Incomplete kitchen facilities; and
2. Incomplete plumbing facilities; and
3. More than 1 person per room; and
4. Cost burden over 50% of household income to housing.

Source: *HUD Comprehensive Housing Affordability Strategy (CHAS) data 2012-2016*

Housing Cost Burden

Residents that spend more than 30% of their monthly household income on rent/ mortgage and utilities struggle to pay for other basic needs, such as food, transportation, child care and medical services. When the poorest households are housing cost burdened, they are at a high risk for homelessness.



To submit comments or for more information email: fairhousing@ogdencity.com or call 801-629-8903.

Incomes Not Keeping Pace

Housing affordability in Utah, over the long-term, is threatened due to the gap between the annual real rate of increase in housing prices annually of 3.32 percent and the annual real rate of increase in household income of 0.36 percent. In Utah housing prices increase much faster than incomes and many households face high levels of housing cost burdens as a consequence.

Source: *Wood, J., & Eskic, D. (2016). Housing Prices and the Threat to Affordability, Kem C. Gardner Policy Institute, The University of Utah. Research Brief, 8.*

Home Prices vs Income

While household income in Ogden has increased, it has not kept up with the median home sales price in Ogden. This trend puts more households at risk for housing cost burden, paying more than 30% of income to housing expenses.

In Ogden 2000 - 2017



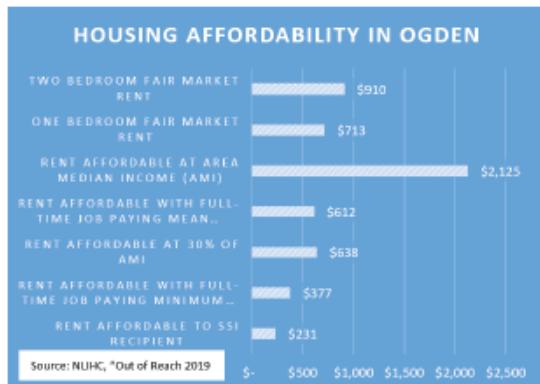
Fair Market Rent vs Minimum Wage

A worker earning minimum wage must work over **97 hours per week** to afford a 2 bedroom rental unit at Fair Market Rent
NLIHC, "Out Of Reach 2019 Report"

FAIR HOUSING

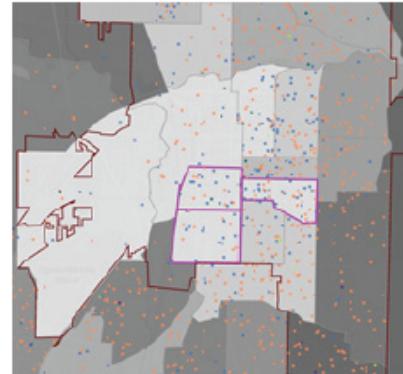
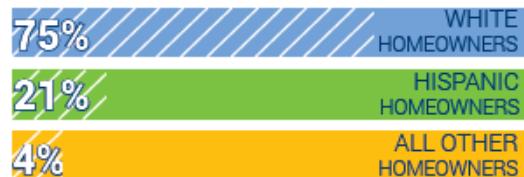


Who has fair housing rights? EVERYONE.



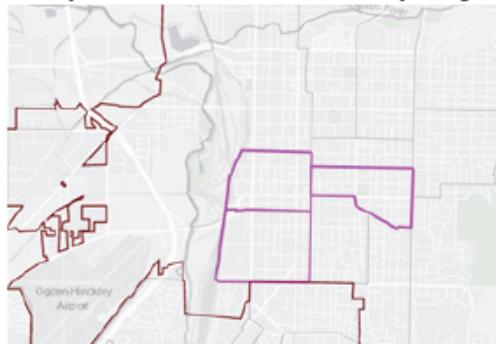
The Fair Housing Act of 1968, as amended in 1988, is a civil rights act that prohibits discrimination in all housing transactions on the basis of **race, color, religion, gender, disability, family status, and national origin**.

Home Ownership % by Ethnicity in Ogden



A household with income below the median has a one in five chance of a severe housing cost burden, paying at least 50 percent of their income toward housing, while a household with income above the median has a one in 130 chance.

Affirmatively Furthering Fair Housing Racially Concentrated Areas of Poverty in Ogden



Most Common Fair Housing Complaints in Ogden

Discrimination based on disability
Discrimination based on color
Discrimination based on familial status
Landlord denying reasonable accommodations
Source: Complaints received by Disability Law Center and Utah Antidiscrimination and Labor Division

XI. 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.



Michael P. Caldwell

Date

Attest:

Lee Ann Peterson
Chief Deputy City Recorder

