

**SUMMARY:
FAIR HOUSING EQUITY ASSESSMENT
SALT LAKE COUNTY**

HUD requires the Fair Housing Equity Assessment (FHEA) to discuss four characteristics of cities and counties in the study area. These characteristics are: (1) recent demographic trends, (2) segregation, i.e. concentration of protected classes, (3) racially concentrated areas of poverty, and (4) disparities in opportunity regarding, among other attributes, affordable housing, proximity to employment and quality of local schools. The FHEA examines in detail each of these principal characteristics. For each characteristics a number of related attributes are presented in tables and maps. The maps show the spatial distribution of a particular attribute, such as the location of Section 8 voucher holders while the tables provide numerical estimates and indices.

A summary of five key FHEA attributes for each city is presented in *Table 1*. The most recent estimate for each attribute is included. HUD defines entitlement cities as those with a population of more than 50,000. Entitlement cities receive Community Development Block Grants (CDBG) directed toward revitalizing neighborhoods, economic development, and providing improved community facilities and services. Non-entitlement cities receive funding through the county or state for CDBG activities.

**Table 1
Major FHEA Attributes of Fifteen Cities in Salt Lake County**

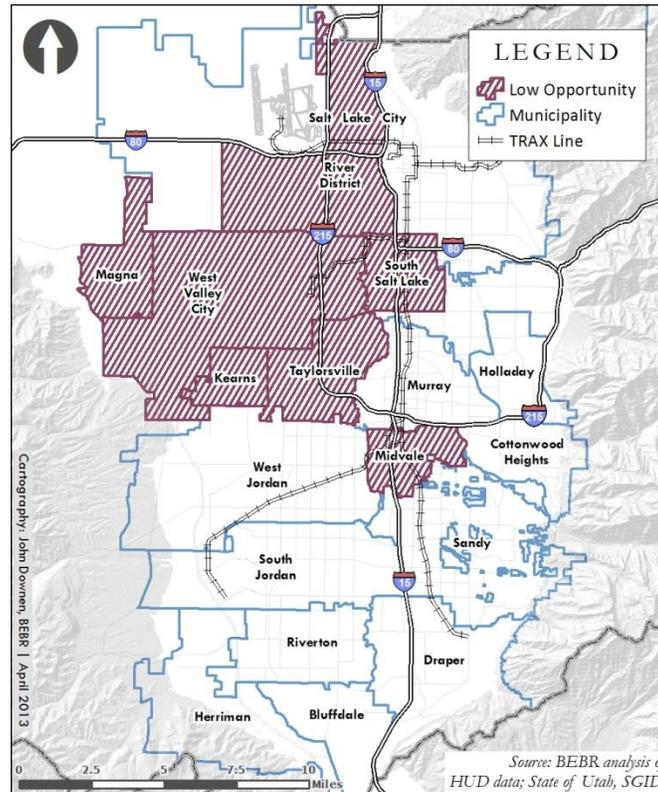
	Minority Population 2010	% Chg Minority Population 2000-2010	Percent of Individuals in Poverty	Opportunity Index (1 very low 10 very high)	% of Affordable Housing Needs Met*
Entitlement Cities					
Salt Lake City	64,115	20.1	16.6	4.9	130
Sandy City	12,201	54.5	5.7	7.0	39
South Jordan	6,031	229.4	1.6	8.0	3
Taylorsville	17,112	48.3	9.5	3.3	40
West Jordan	26,352	147.5	5.6	4.5	21
West Valley	59,982	85.4	10.7	2.0	62
Non-Entitlement Cities					
Bluffdale	542	149.8	4.7	3.0	28
Cottonwood Heights	3,957	76.1	5.3	7.5	15
Draper	5,792	107.5	4.9	7.7	5
Herriman	2,266	2,415	1.7	6.0	
Holladay	2,852	249.0	6.0	7.3	35
Midvale	8,858	23.3	17.7	3.1	82
Murray	7,575	79.5	7.7	5.9	59
Riverton	3,737	184.0	3.8	5.7	6
South Salt Lake	6,031	35.9	37.3	1.5	196
Salt Lake County					
Salt Lake County	267,770	56.4	9.4	4.9	na

*Rental housing needs met for renters with incomes from 30% to 50% AMI.

Source: U.S. Census Bureau and HUD.

The results of the FHEA identify five low opportunity cities; Salt Lake City (River District), South Salt Lake, Midvale, Taylorsville and West Valley City as well as two low opportunity neighborhoods in unincorporated Salt Lake County; Magna and Kearns *Figure 1*. Within these cities and neighborhoods opportunity and equity are at risk.

Figure 1
Low Opportunity Cities and Neighborhoods in Salt Lake County



Background: Demographic Change Through a Fair Housing Lens

HUD requires that the FHEA include an overview of recent demographic changes in the protected classes. While essentially descriptive this section provides the demographic context and dynamics that underlie opportunity and equity.

Minority and Hispanic Population

¶From 2000 to 2010 the population of Salt Lake County increased by 15 percent however, the county’s minority population grew by 56 percent; an increase of 96,500 individuals. Three quarters of the population growth in Salt Lake County in the past ten years is due to the increase in the county’s minority population.

¶The minority population in Salt Lake County in 2010 was 267,770; accounting for 26 percent of the population of the county. The five cities with the highest concentration of minority populations are: West Valley City 46.3 percent minority, South Salt Lake 43.5 percent, Salt Lake City 34.4 percent, Midvale 31.7 percent and Taylorsville 29.2 percent. Bluffdale has the lowest share of minority individuals at 7.1 percent

¶The largest minority population group is Hispanic. The Hispanic population increased at a faster rate than the minority population. From 2000 to 2010 the Hispanic population in the county increased by 69,228 individuals, an increase of 64.8 percent. During this decade the Hispanic population increased from 11.9 percent of the county's population to 17.1 percent.

¶The Hispanic population in the county in 2010 was 176,015, representing two-thirds of all minority individuals. The five cities with the highest concentration of Hispanic population are: West Valley 33.1 percent Hispanic, South Salt Lake 29.1 percent, Midvale 24.3 percent, Salt Lake City 22.3 percent and Taylorsville 18.6 percent. Bluffdale has the lowest share of Hispanic individuals at 4.4 percent.

Disabled Individuals

¶The Bureau of the Census has published reliable estimates on disabled individuals in Salt Lake County for 2010. Unfortunately these estimates cannot be compared to the 2000 Census estimates due to significant changes in definitions of disabilities. The 2010 definitions are narrower in scope resulting in a decrease in the number of disabled individuals. The change in definitions produces lower but more accurate estimates of the disabled population.

¶In 2010 eight percent of the Salt Lake County population meets the definition of disabled; an estimated 83,600 unique individuals. Many disabled individuals suffer from more than one disability. The number of individuals with ambulatory difficulty was 38,350, with self-care limitations 15,050, independent living difficulty 27,675 and cognitive difficulty 33,650. Seniors (65 years and more) comprise thirty seven percent of the disabled population.

¶A sizeable share—an estimated eighty percent—of disabled individuals live in households where householder is a homeowner. Unfortunately these individuals are less likely to have accessible units since the Fair Housing Act (FHA) does not apply to owner-occupied dwelling units. Visitability and accessibility for such individuals can only be improved through changes in local building codes, education and awareness of home builders and home buyers.

¶In many cases the FHA does apply to the construction of rental units therefore the act plus local housing policy and practices can more effectively address the visitability and accessibility needs of renters. There are an estimated 5,600 ambulatory disabled renters in the county. For most of these individuals the FHA accessibility standards would likely be sufficient. However, for those that require Type A accessibility, due primarily to use of a wheelchair, demand exceeds supply.

¶Since 1991 about 7,400 apartments units built in Salt Lake County should have met FHA standards. The number of rental units meeting the higher Type A standard—suitable for wheelchair accessibility—is estimated at less than 50 units in large market rates projects and 235 units in federally assisted rental projects.

¶National data indicate that about six tenths of one percent of the population requires a wheelchair. Applying this percent to the number of persons living in rental units in Salt Lake County in 2010 (295,000 persons) about 1,800 would require a wheelchair. Since 2003 the number of Type A accessible units built probably does not exceed 300 units (50 units in market rate projects and 235 units in federally assisted units) far short of the estimated need of 1,800 units. Furthermore, for those renters requiring wheelchair accessible units supply is largely confined to those communities

where new tax credit projects have been built. Half of all Type A accessible units in federally assisted projects are in Salt Lake City. Fair housing choice for disabled renters requiring the use of a wheelchair is limited.

¶ HUD has provided some estimates, at the national level, of the nonelderly renter households with disabled individuals. Using the national ratio it is estimated that about 11,100 households in Salt Lake County are renter households with a disabled individual.

¶ HUD has also provided some recent estimates on disabled individuals with “worst case housing needs”. This group is defined by HUD as those renter households with disabled individual(s) receiving no housing assistance, very low income (less than 50 percent AMI) and severe cost burdens (paying more than 50 percent of income for housing). The estimated number of “worst case housing needs” individuals is 2,800. Sixty percent of these individuals have ambulatory difficulty. The second largest disability category for this group is cognitive difficulty.

¶ The need for accessible housing units far exceeds the demand due in large part to the lack of any accessibility standards for detached single-family homes. In addition renter households with disabled individuals that need Type A accessibility standards and/or have “worst case housing needs” the supply of accessible, affordable units falls far short of demand.

Family Status

¶ Another protected class is familial status, which refers to a group that includes pregnant women, children living with their parents, and legal custodians of children. While the language about familial status discrimination is clear, the guidelines landlords can use to establish occupancy are notoriously vague and for most communities nonexistent. Although landlords can create occupancy guidelines based on the physical limitations of the housing unit landlords often impose strict occupancy limitations precluding large families with children.

¶ Nationally HUD data show that familial status discrimination ranks third in discrimination of protected classes, behind discrimination due to race and disability. The local complaint data from Utah’s office of Antidiscrimination and Labor shows familial status ranks second in frequency behind complaints based on disabilities. Twenty-five percent of complaints to local HUD office and Utah’s Antidiscrimination & Labor Division over the past five years have been based on familial status.

¶ Male and female householders with no spouse present but children under 18 years of age represent 8.6 percent of all households in Salt Lake County. These single parents are vulnerable to discrimination due to socioeconomic characteristics associated with this group. Interestingly, single parent households with children have grown at a slower rate than many other household types over the past ten years.

¶ In absolute terms the number of single females with children under 18 years of age has increased by 2,342 during the 2000 to 2010 period. In 2010 there were 20,666 single female households with children under 18 years of age, six percent of all households. The total number (male or female) of single-parent households in 2010 in Salt Lake County was 29,624.

Segregation

¶The minority population in Salt Lake County is concentrated in seven areas; Kearns, Magna, Midvale, Salt Lake City's River District (neighborhoods west of I-15, east of I-215 north and south city boundaries), South Salt Lake, Taylorsville and West Valley. These seven areas account for 35 percent of the population in the county in 2010 but have 58 percent of the minority population. The percent share of the county's minority population living in these seven areas is nearly unchanged over the past ten years. In 2000 the seven areas mentioned above had 59.6 percent of the minority population in the county. By 2010 their share had dropped by only one percent to 58.4 percent.

¶The concentration of the Hispanic population has also experienced little change from 2000 to 2010. Kearns, Magna, Midvale, Salt Lake City's River District, South Salt Lake, Taylorsville and West Valley had 64.6 percent of the county's Hispanic population in 2000 and 64.7 percent in 2010. In terms of relative and absolute share and change West Valley City is the dominant city. Over the past ten years the Hispanic population in West Valley City has increased by 113.1 percent compared to 65 percent countywide; nearly twice the rate of the county. Kearns and Magna are two other areas where the Hispanic population is becoming more concentrated.

¶While the minority and Hispanic populations have had large absolute increases in West Valley, Salt Lake City and Taylorsville—cities that have traditionally had a disproportionate share of the minority population—it is important to point out that there has been some shift south in the spatial distribution of minorities in Salt Lake County; most notably in West Jordan and Sandy. West Jordan ranks second among all cities in absolute increase in minority population over the 2000 to 2010 period with an increase of 15,700 minority individuals. Sandy City ranks fifth in absolute growth of the minority population with an increase of 4,300 in the decade.

¶Even a slight change in the spatial distribution of minority and Hispanic populations in the county is a very positive demographic development. In relative terms several unlikely cities have seen increasing diversity, albeit for these cities the absolute numbers are still small. Nevertheless the following cities have all exceeded the countywide increase in minority population of 56 percent by a large margin: Bluffdale minority population up 150 percent, Holladay 249 percent, Riverton 184 percent and South Jordan 229 percent. The same cities also had triple digit increases in their Hispanic populations.

¶Access to public transportation as well as the siting of affordable housing are two factors contributing to high concentration of minority and Hispanic populations in the geographic arc running from Salt Lake City's River District south through South Salt Lake then west to West Valley and Taylorsville

¶HUD developed ratios of predicted/actual racial and ethnic concentrations. Using these ratios Riverton, South Jordan, Cottonwood Heights, and Holladay—all cities in the southern and eastern part of the county—have minority household shares that are only half the predicted shares. Nearly all the other cities in the southeastern region of the county also have below-predicted minority household shares. As expected, the cities with above predicted minority composition were Taylorsville, Midvale, Salt Lake City, South Salt Lake and West Valley City.

¶While the concentrations of minority and Hispanics have persisted in Salt Lake County dissimilarity indexes show that the county has low to moderate segregation. The dissimilarity index developed by

Brown University's program in Spatial Structures in Social Sciences was used to measure dissimilarity. An index number above 60 is considered high similarity and segregated. An index number of 40 to 50 is considered moderate segregation and values of 30 or below are considered low levels of segregation. The dissimilarity index numbers for the Salt Lake Metropolitan area are moderate to low for the three race categories included. Hispanics/White show moderate levels of segregation with an index estimate of 42.9 percent, Black/White is low with an index estimate of 34 and Asian/White also low with index estimate of 27. A second dissimilarity index developed by BEBR also shows the county has moderate levels of segregation.

¶Housing discrimination based on familial status ranks as the third most often cited discrimination complaint. The nature of these complaints generally regards large families trying to find suitable rental housing. Due to the siting of affordable rental housing these families are limited in their housing opportunities. Census data shows that nearly half of all large renter households live in Salt Lake City, West Valley, South Salt Lake and Taylorsville. Less than ten percent of large families renting live in five city area of South Jordan, Riverton, Herriman, Bluffdale and Draper. In effect, the limited opportunity of affordable rental housing for large families in the southeast and southwest section of the counties has segregated this protected class to the northwest and west mid-valley sections of the county.

¶Disability data show that the greatest areas of concentration of disabled persons is mid-valley Salt Lake County; including South Salt Lake, Murray, Midvale, West Valley City, Taylorsville and unincorporated Kearns. These households have a relatively high likelihood of being low income renters. The spatial distribution patterns of the disabled again reflect public policies regarding the siting of affordable rental housing, which tend to segregate protected classes.

Racially Concentrated Areas of Poverty (RCAP) and Ethically Concentrated Areas of Poverty (ECAP)

¶Increasing concentrations of low-income and poverty households are linked to racial and ethnic segregation. "The face of poverty is also the face of segregation." And segregation impedes fair housing choice and raises the risk of housing discrimination. The consequences of poverty are particularly harmful to children. Children who grow up in densely poor neighborhoods and attend low-income schools face many barriers to academic and occupational achievement. Such children are more likely to drop out of high school and become pregnant as teenagers. Their neighborhoods have higher crime rates and higher incidence of health disparities, again affecting opportunities.

¶In 2010, 9.4 percent of Salt Lake County's population was poor. Approximately 6.8 percent of non-Hispanic whites were poor. Minorities were almost three times as likely to be poor with a poverty rate of 18.2 percent. In the entire county, blacks had the highest prevalence of poverty with just over 22 percent, followed by Hispanics at about 19 percent.

¶Though non-Hispanic whites had the lowest prevalence of poverty; they comprised about 56.2 percent of the total poor population in the county. Poor Hispanics were the second largest poor population at 32.1 percent of the total poor and almost three quarters of the poor minority population. About 5 percent of the poor populations were Asian, and about 8 percent were black, Native American or Pacific Islanders.

¶The racial and ethnic composition of the poor in the context of the entire county population demographics illustrates the disparities in income between the minority and non-minority populations in the county—even though minorities comprised slightly over a quarter of the county’s total population in 2010, they accounted for nearly 44 percent of the total poor in the county.

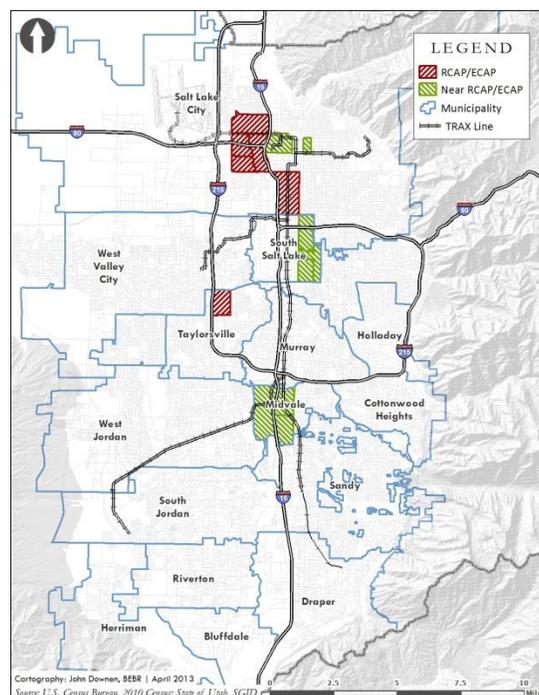
¶The concentration of poor populations varies greatly by city. South Jordan’s 1.6 percent poverty is the lowest in the county and South Salt Lake had the highest poverty rate of any city, with over 37 percent of the population living in poverty. More than three-quarters of the poor in South Salt Lake are minorities—the highest minority share of the poor in the county.

¶Even within the low-income populations of Salt Lake County, patterns of racial and ethnic segregation still exist. Poor whites are more likely to live on the east and south sections of the county while poor minorities are more likely to live in the west and north sections of the county.

In Salt Lake County, there are three racially and ethnically concentrated areas of poverty (RCAP/ECAP) as defined by HUD. All three are in the northern half of the county. HUD defines a racially/ethnically concentrated area of poverty as a census tract where the number of families in poverty is equal to or greater than 40 percent of all families, or an overall family poverty rate equal to or greater than three times the metropolitan poverty rate, and a non-white population, measured at greater than 50 percent of the population. In addition to the three RCAP/ECAPs there are four “near” RCAP/ECAPs. Two in downtown Salt Lake City, one in South Salt Lake and one in Midvale *Figure 2*.

The RCAP/ECAPs have not only a high concentration of the poor minority population but also a very high concentration of renter households. In two RCAP/ECAPs over 70 percent of households are renters.

Figure 2
RCAP/ECAPs and Near RCAP/ECAP in Salt Lake County



Disparities in Opportunity

“Sustainability also means creating “geographies of opportunity,” places that effectively connect people to jobs, quality public schools and other amenities. Today too many HUD-assisted families are stuck in neighborhoods of concentrated poverty and segregation, where one’s zip code predicts poor education, employment and even health outcomes. These neighborhoods are not sustainable in their present state.” *Shawn Donovan, Secretary of Housing and Urban Development.*

¶ HUD provided an opportunity index to quantify the important community attributes that influence the ability of an individual, or family, to access and capitalize on opportunity. HUD created five indices; school proficiency, poverty, labor market, housing stability and job access. City level scores ranged from as low as 1.5 in South Salt Lake to as high as 8.0 in South Jordan. Based on HUD’s opportunity index there are five low opportunity, four moderate opportunity and six high opportunity cities in the county, see below.

**Table 2
Low, Moderate and High Opportunity Cities**

Low Opportunity	Opportunity Index	Moderate Opportunity	Opportunity Index	High Opportunity	Opportunity Index
South Salt Lake	1.5	West Jordan	4.5	Herriman	6.0
West Valley	2.0	Salt Lake City	4.9	Sandy	7.0
Bluffdale	3.0	Riverton	5.7	Holladay	7.3
Midvale	3.1	Murray	5.9	Cottonwood Heights	7.5
Taylorsville	3.3			Draper	7.7
				South Jordan	8.0

Source: HUD Spreadsheet for Sustainable Communities grantees.

¶ The disparity in opportunity for protected classes in Salt Lake County is dramatically revealed by the share of population groups relegated to very low opportunity areas. About thirty percent of the county’s population lives in areas with the lowest opportunity index of 1-2. However, for the Hispanic population 60 percent live in very low opportunity areas while 54 percent of all minorities (including Hispanics) live in very low opportunity areas and 22 percent of whites (non-Hispanic). Less than 5 percent of Hispanics live in high opportunity areas see below.

**Table 3
Opportunity by Population Group**

Opportunity Index Score	Total Population		Hispanics		Minority		White Non-Hispanic	
	Number	Share	Number	Share	Number	Share	Number	Share
1-2	296,481	29.6%	93,145	60.0%	128,162	54.0%	168,319	22.1%
3-4	155,687	15.6%	24,287	15.7%	37,193	15.7%	118,494	15.5%
5-6	261,502	26.1%	23,767	15.3%	39,923	16.8%	221,579	29.1%
7-8	123,761	12.4%	6,778	4.4%	15,646	6.6%	108,115	14.2%
9-10	162,868	16.3%	7,151	4.6%	16,627	7.0%	146,241	19.2%
Totals	1,000,299	100%	155,128	100%	237,551	100%	762,748	100.0%

Source: HUD Spreadsheet for Sustainable Communities Grantees.

¶ In addition to the HUD developed opportunity index BEBR has weighed a number of measures of opportunity by city to further explore access and barriers to opportunity. These measures include location of child care facilities, food deserts, medically underserved areas/populations, crime rates, quality of housing stock, housing affordability and public school characteristics.

Child care facilities – the spatial distribution of facilities appears to modestly favor east-side neighborhoods. There are no pronounced gaps in availability of services, however cost data are not available and are a critical component of accessibility.

Food deserts – Using the USDA’s *Food Access Research Atlas* food deserts in Salt Lake County were identified. A food desert is defined by income, accessibility and vehicle ownership. Possible food deserts were identified in South Salt Lake and the neighborhoods of Rose Park, Fair Park and Poplar Grove in Salt Lake City.

Medically Underserved Areas/Population – The U.S. Department of Health and Human Services has designated underserved areas. In Salt Lake County they include: west-side Salt Lake City, South Salt Lake, Taylorsville, Midvale, West Valley, Magna and Kearns.

Crime Rates – The cities with the highest crime rates in the county are: Salt Lake City, South Salt Lake, Murray, West Valley and Taylorsville.

Deteriorating Quality of Housing Inventory – Homes that are greater than fifty years old and have a value of less than \$150,000 have a much higher likelihood of deferred maintenance, deteriorating quality and high energy costs. The neighborhoods most at risk of deteriorating quality in Salt Lake City are Rose Park, Poplar Grove and Glendale. The other two high risk neighborhoods are Kearns and Magna.

Diversity of Home Values and Affordability – Housing price diversity in several cities is limited in Salt Lake County, restricting access to opportunity for potential homeowners. Some cities on the county’s west-side—West Valley and Taylorsville—have relatively few opportunities for families seeking homes valued above \$300,000 while many southeast, southwest and east-side cities have little housing opportunities for moderate to low income families.

Educational Opportunity - For the children of any neighborhood the most important factor shaping lifetime opportunities is the quality of the local schools. Educational opportunity varies significantly throughout the public schools across the county often leading to decisive disparities in educational opportunity. The impact of these disparities falls heaviest on the children of protected classes. These disparities have long-term consequences. Most obvious is lower levels of educational attainment, which in turn affects future earnings trapping individuals, families and entire communities in a generational cycle of poverty. Due to the strong link between education and opportunity considerable discussion and numerous measures were used, in the body of the study, to evaluate those factors affecting student achievement and school performance.

School Opportunity Index by City – Independent of the HUD index BEBR developed a school opportunity index by city. The index used two positive dimensions: percent proficiency in language arts and percent proficiency in science for elementary, middle and high schools and four negative dimensions (proxies for home environment and educational quality): the percent of students eligible for free and reduced lunch, percent of minority students, percent of students with parents with limited English proficiency (LEP) and average classroom size. Draper, South Jordan and Herriman scored the highest on the index while South Salt Lake, west-side Salt Lake City and West Valley scored the lowest, see below.

Table 4
School Opportunity Index by City – 2011
(Index 1=poor, 10=excellent)

City	Index
Draper	9.0
South Jordan	8.9
Herriman	8.4
Riverton	8.3
Holladay	7.9
Cottonwood Heights	7.7
Sandy	7.7
Bluffdale	7.0
Murray	6.6
East Side Salt Lake City	6.3
West Jordan	5.4
Salt Lake City	4.2
Taylorsville	4.2
Midvale	3.7
West Valley City	2.5
West Side Salt Lake City	1.9
South Salt Lake	1.0

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

Minority, Low Income Schools - Consistently the same four or five cities are disproportionately affected by growing concentrations of minorities in a few cities in Salt Lake County. For some public schools this has led to very high rates of minority students, primarily Hispanic students. The increasing proportion of children with non-English backgrounds can put an extra burden on a school’s administration, teachers and resources. Difficulty with English may impede proficiency in academic subjects, hurting both student and school achievement. Not only is there a heavy concentration of minority students in the Salt Lake City, South Salt Lake, West Valley, Kearns and Magna schools but a substantial share of these minority students are members of low income or poor households, which intensifies the challenge and raises the risk that a school’s socioeconomic background may limit educational opportunities. For example high minority, high poverty schools may have a “dilution of the curriculum” to accommodate low achieving students accompanied with diminished teacher expectations; a potentially damaging consequence of high concentrations of low income minority households.

Many studies have shown that high rates of poverty are detrimental to school and student achievement. Students from poor households have much higher educational risks and when assigned to a high poverty school the risks and disadvantages are compounded. High concentrations of school poverty are a threat to a student’s educational, social and ultimately employment opportunities. When a school’s student body becomes 50 percent poor, classroom achievement declines; at 75 percent poor achievement is seriously threatened. Income inequality is the driving force in disparities of educational opportunity nationally and locally.

Affordable Housing Need

The need for affordable housing in Salt Lake County is substantial. Below the deficit/surplus of affordable housing for owners and renters with income levels from 30% to 50% AMI is shown. Sandy City has the largest deficit of 2,908 units however, in Salt Lake City and South Salt Lake there is a surplus of affordable units. In both cities this is due to a large number of affordable apartment units

Table 5
Deficit/Surplus of Affordable Rental Units in Salt Lake County
County Deficit 16,000 Units
(Renter Income Level – 30% to 50% AMI)

City	Deficit/Surplus	City	Deficit/Surplus
Bluffdale	-157	Salt Lake City	2,762
Cottonwood Hts	-1,211	Sandy City	-2,908
Draper	-1,220	South Jordan	-1,376
Herriman	-522	South Salt Lake	914
Holladay	-762	Taylorsville	-1,370
Midvale	-236	West Jordan	-2,263
Murray	-874	West Valley	-1,668
Riverton	-869		

Source: HUD Spreadsheet for Sustainable Community Grantees.