## Bluffdale: Fair Housing Equity Assessment

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[DRAFT]

### TABLE OF CONTENTS

Summary of Fair Housing Equity Assessment	4
Fair Housing Equity Assessment Analysis	5
Background	6
Segregation	10
RCAP	
Disparities in Opportunity	
Lending Practices	43
TABLE OF FIGURES	
Figure 1 Large Renter Households by City and Share of Salt Lake County Large Renter Households.	
Figure 2 Beneficiaries of Social Security Disability by Zip Code in Salt Lake County, 2010	
Figure 3 Dot Density of Salt Lake County Minority Population by Census Block, 2000 to 2010.	
Figure 4 Percent of Minority Population by Tract in Bluffdale, 2000 to 2010	
Figure 5 Minority Owner-Occupied Units in Bluffdale – 2010	
Figure 6 Share of Owner-Occupied Units in Bluffdale Occupied by Minority Household – 2010.	
Figure 7 Minority Owner-Occupied Units and Proximity to Low-Wage Jobs Bluffdale, 2010	
Figure 8 Minority Renter-Occupied Units by Tract in Bluffdale - 2010	
Figure 9 Minority Share of Renter-Occupied Units by Tract in Bluffdale - 2010	
Figure 10 Minority Renter-Occupied Units and Proximity to Low-Wage Jobs in Bluffdale, 2010.	
Figure 11 Single-Family Homes Affordable at 80% AMI in Bluffdale, 2011	
Figure 12 Dissimilarity Index for Minorities in Salt Lake County - 2010	
Figure 13 Poor by Census Tract in Bluffdale, 2010	
Figure 15 Concentrations of Poverty and Minority Majority by Tract in Salt Lake County, 2007-	
Figure 15 Concentrations of Foverty and Minority Majority by Tract in Sait Lake County, 2007-	
Figure 16 Concentrations of Poverty and Hispanics by Tract in Salt Lake County, 2007-2011	
Figure 17 Concentrations of Poverty and Minorities by Tract in Salt Lake County, 2007-2011	
Figure 18 Subsidized Apartment Projects in Salt Lake County, 2011	
Figure 19 Section 8 Vouchers in Bluffdale, 2011	
Figure 20 Individuals Receiving Public Assistance by Zip Code, 2012	
Figure 21 Number of Large Families by Zip Code Receiving Public Assistance, 2012	27
Figure 22 Disabled Recipients Receiving Public Assistance by Zip Code, 2012	28
Figure 23 Hispanic Recipients of Public Assistance by Zip Code, 2012	
Figure 24 Percent of Individuals Residing in a Zip Code Receiving Public Assistance, 2010	
Figure 25 Opportunity Index by Census Tract in Bluffdale	
Figure 26 Childcare Centers in Salt Lake County, 2010	
Figure 27 Free/Reduced Lunch Eligibility in Bluffdale, 2011	
Figure 28 Share of Students Proficient in Language Arts in Bluffdale Public Schools - 2011	34

Figure 29 Share of Students Proficient in Science in Bluffdale Public Schools - 2011	34
Figure 30 Minority Share of Enrollment in Public Schools in Bluffdale - 2011	
Figure 31 Share of Students with Parents of Limited English Proficiency in Bluffdale	
Figure 32 Total Minority Enrollment Changes, 2007–2011	37
Figure 33 Minority Enrollment Percentage Change, 2007–2011	38
Figure 34 Percent of Students with LEP Parents, 2010	39
Figure 35 Assessed Value of Detached Single Family Homes in Bluffdale - 2011	40
Figure 36 Share of Foreclosed Owned Housing Units, 2008-2012	
Figure 37 Percent of Mortgage Loan Applications Denied by Race/Ethnicity in S Incorporated Cities, 2006–2011	
Figure 38 Percent of Mortgage Loan Applications (At or Below 80% HAN Race/Ethnicity in Salt Lake County Incorporated Cities, 2006–2011	IFI) Denied by
Figure 39 Percent of Mortgage Loan Applications (Above 80% HAMFI) Denied by in Salt Lake County Incorporated Cities, 2006–2011	y Race/Ethnicity
Figure 40 Applicant Income Distribution by Race/Ethnicity in Salt Lake County C	Cities, 2006–2011
Figure 41 Percent of High-Interest Loans among Approved Applicants by Race/ Lake County Cities, 2006–2011	Ethnicity in Salt
LIST OF TABLES	7
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010  Table 2 Demographic Trends for Protected Classes (Absolute Change), 1990–2010.	7
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010  Table 2 Demographic Trends for Protected Classes (Absolute Change), 1990–2010.  Table 3 Demographic Trends for Protected Classes (Percent Change), 1990–2010	7 7
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010  Table 2 Demographic Trends for Protected Classes (Absolute Change), 1990–2010  Table 3 Demographic Trends for Protected Classes (Percent Change), 1990–2010  Table 4 Average Household Size by Race/Ethnicity in Bluffdale, 1990–2010	7 7 8
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010  Table 2 Demographic Trends for Protected Classes (Absolute Change), 1990–2010.  Table 3 Demographic Trends for Protected Classes (Percent Change), 1990–2010  Table 4 Average Household Size by Race/Ethnicity in Bluffdale, 1990–2010  Table 5 Homeownership Rate by Race/Ethnicity in Bluffdale, 1990–2010	7 8 10
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010	
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010	
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010	
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010	
Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010	
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010 Table 2 Demographic Trends for Protected Classes (Absolute Change), 1990–2010 Table 3 Demographic Trends for Protected Classes (Percent Change), 1990–2010 Table 4 Average Household Size by Race/Ethnicity in Bluffdale, 1990–2010 Table 5 Homeownership Rate by Race/Ethnicity in Bluffdale, 1990–2010 Table 6 Rental Tenure Rate by Race/Ethnicity in Bluffdale, 1990–2010 Table 7 Total Households by Race and Ethnicity in Bluffdale, 1990–2010 Table 8 Rental Households by Race and Ethnicity in Bluffdale, 1990–2010 Table 9 Predicted Racial/Ethnic Composition Ratio Bluffdale Table 10 Fair Share Affordable Housing Index Bluffdale Table 11 Dissimilarity Index	
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010	
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010	
Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010	
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010	
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010	
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010	
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010	
LIST OF TABLES  Table 1 Demographic Trends for Protected Classes in Bluffdale, 1990–2010	

#### SUMMARY OF FAIR HOUSING EQUITY ASSESSMENT

#### Background

- The minority share of Bluffdale's population increased from 1.8 percent in 1990 to 7.1 percent in 2010.
- While minorities accounted for 7 percent of Bluffdale's net population growth from 1990 to 2000, they constituted over 11 percent of the city's growth in the last decade.

#### Segregation

- While the non-Hispanic white rental rate was 17.5 percent in 2010, the minority rental rate was over 43 percent.
- Slightly over 7 percent of the total housing units in Bluffdale are in the northeastern region that shares a census tract boundary with the commercial parts of western Draper. However, Bluffdale only has one bus route with access to neighboring Draper. This could pose difficulties in public transit for Bluffdale residents, who mostly do not live in the northeastern region.
- The northeast corner of Bluffdale and the west part of Draper have over 6,800 low-wage jobs.

#### RCAP/ECAP

- The overall poverty rate in Bluffdale in 2010 was approximately 5 percent, while a minority resident was twice as likely to be poor as a non-Hispanic, white resident.
- The city has no racially or ethnically concentrated areas of poverty, nor are there any concentrations of minorities or Hispanics more than 10 percentage points above the county average.

#### Disparities in Opportunity

- HUD provided an opportunity index that aggregated a variety of factors such as school proficiency, job access, poverty, and housing stability. Overall, Bluffdale received a score of 3, which is 1.9 points below the county average.
- There is only one public school located in Bluffdale, the elementary school, Bluffdale School, which on its own scored an opportunity score of 7 out of 10. However, Bluffdale received a low-ranking score for school proficiency on HUD's citywide index.
- The assessed single family home values in the city are generally high, above \$300,000, with few home values affordable to low-income families.

#### FAIR HOUSING EQUITY ASSESSMENT ANALYSIS

The city of Bluffdale has seen a significant increase in minority populations over the last couple of decades. The minority share of the population increased from 1.8 percent (numbering fewer than 40 minority residents) in 1990 to over 7 percent in 2010. Though non-Hispanic whites still greatly outnumber minorities in the city, the increase in minority residents cannot be ignored, especially since almost half of minorities living in Bluffdale in 2010 were renters, compared to less than a fifth of non-Hispanic whites. This indicates that a disproportionate share of minorities are renters, and are therefore more likely to be of lower income. The homeownership gap highlights the disparity in wealth between minorities and non-Hispanic whites.

Just to the east of Bluffdale is the neighboring city of Draper. The northeast corner of Bluffdale and western portion of Draper has about 6,800 low-wage jobs. However, only about 7 percent of all homes in Bluffdale are located in this area. Even more striking, the city only has one bus route serving as the single mode of public transportation, providing access to neighboring Draper. However, only 5.6 percent of minority households reside in this small northeastern region of the city. As a result, access to these jobs can be difficult, especially for families without personal modes of transportation who rely on rideshares, walking/biking, or public transit. Certainly, additional bus routes thoughout the city could provide easier public transit options for all residents, especially those seeking low-wage jobs in Draper and the northeastern corner of Bluffdale.

The city of Bluffdale only has one public school, serving nearly 7,600 residents. This school, Bluffdale Elementary School, only serves students from kindergarten to sixth grade; from there, students living in Bluffdale are in the jurisdiction of Riverton High School in the neighboring city of Riverton. Even though Bluffdale School ranks fairly high, with a school opportunity score of 7 out of 10, the school opportunities in Bluffdale are quite limited. Similarly, families living in Bluffdale are often located far from the schools their children are attending, adding longer commute times and less ability to engage in schools by parents with little to no means of transportation. Again, more transportation options both within the city of Bluffdale, as well as connecting routes between neighboring cities and Bluffdale could prove to be highly beneficial in opening access to opportunity for low-income, minority, and other residents of the city.

With the exception of the tract in the northeastern corner of the city that Draper shares with Bluffdale, the overall access to opportunity in the city of Bluffdale is quite low, especially for low-income and minority residents. The home prices in the city are high and the rental options are few. Bluffdale had the lowest Hispanic application volume in the county, amounting to only 30 applications from 2006 to 2010. This low Hispanic participation rate in Bluffdale could represent an underlying symptom of housing impediments, including housing affordability. Even if the housing stock in Bluffdale were to become more affordable, the public transit options are minimal and the proximity to goods, services, healthcare and employment centers is low. In short, the opportunities in Bluffdale are minimal for many members of the protected classes, and the opportunity gap between non-Hispanic whites and minorities in the city will not close without proper intervention.

#### BACKGROUND

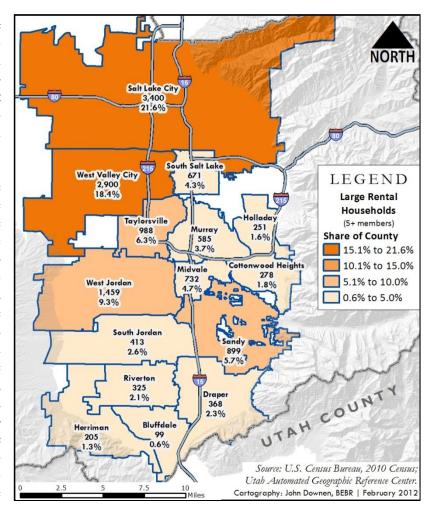
Bluffdale is located at the southern end of Salt Lake County. The city has experienced moderate population growth from 1990 to 2010 during which the non-Hispanic white share of the population has retained an overwhelming majority.

Table 1 shows selected demographic trends in Bluffdale from 1990 to 2010. The minority share increased from 1.8 percent in 1990 to 7.1 percent in 2010. The increase in minorities was mostly driven by the Hispanic/Latino population, whose share increased from 1.2 percent in 1990 to 4.4 percent in 2010.

The share of households with children under 18 decreased from 62 percent in 1990 to 58 percent in 2010. Similarly, the share of households with persons 65 and over decreased from 16.5 percent in 1990 to 14 percent in 2010. Single-parent households with children increased from 5.4 percent in 1990 to 7.7 percent in 2010.

Figure 1 shows each city's share of Salt Lake County's large rental households, which are defined as having five or more persons. Bluffdale only accounts for 0.6 percent of the county's share of large rental households. Over a fifth of the county's large rental households reside in Salt Lake City. The six entitlement cities—Salt Lake City, West Valley, Taylorsville, West Jordan, Sandy, and South Jordan—constitute nearly 64 percent of the county's large rental households. The nonentitlement cities in the southern and eastern regions of the county have very minimal

Figure 1
Large Renter Households by City and Share of Salt
Lake County Large Renter Households, 2010



county shares. Although not pictured in Figure 1, the unincorporated areas are home to nearly 14 percent of the county's large rental households.

Table 1
Demographic Trends for Protected Classes in Bluffdale, 1990–2010

	1990		20	00	2010	
	Count	Share	Count	Count	Share	Count
Total Population	2,152		4,700		7,598	
White (not Hispanic)	2,113	98.2%	4,483	95.4%	7,056	92.9%
Black (not Hispanic)	0	0.0%	11	0.2%	32	0.4%
Asian <sup>1</sup>	4	0.2%	11	0.2%	27	0.4%
Hispanic/Latino	25	1.2%	157	3.3%	334	4.4%
Minority (all except non-Hispanic white)	39	1.8%	217	4.6%	542	7.1%
Persons with disabilities <sup>2</sup>	_	_	345 ± 92	8.1% ± 2.1%	_	_
Total Households	540		1,112		1,966	
Households with Children under 18 years	333	61.7%	725	65.2%	1,137	57.8%
Households with Persons 65 years or over	89	16.5%	148	13.3%	276	14.0%
Single Parent with Children under 18 years	29	5.4%	42	3.8%	152	7.7%
Large Families (5 or more persons)	184	34.1%	456	41.0%	641	32.6%
Owner-occupied Housing Units	458	84.8%	1,031	92.7%	1,598	81.3%
Renter-occupied Housing Units	82	15.2%	81	7.3%	368	18.7%

¹ The Asian population was tabulated by aggregating all the Asian races in the 1990 Census Summary Tape File 1A. This methodology was used into order to disaggregate the Asian and Pacific Islander populations, which were tabulated as one group in the 1990 Census. However, the individual Asian races were not disaggregated by Hispanic origin in the 1990 Census Summary Tape File 1A, so an overlap could exist between the 1990 tabulations for the Asian and Hispanic/Latino populations. This overlap is most likely very small given the relatively few Hispanic Asians in the total population. Note that the Asian category in the table above for 2000 and 2010 are non-Hispanic given the availability of disaggregation by Hispanic origin for the Asian population—separate from the Pacific Islander population—since Census 2000.

Source: U.S. Census Bureau

Table 2
Demographic Trends for Protected Classes
(Absolute Change), 1990-2010

	1990- 2000	2000- 2010
Total Population	2,548	2,898
White (not Hispanic)	2,370	2,573
Black (not Hispanic)	11	21
Asian (not Hispanic)	7	16
Hispanic/Latino	132	177
Minority	178	325
Total Households	572	854
Households with Children <18	392	412
Households with Persons 65+	59	128
Single Parent with Children < 18	13	110
Large Families (5+ persons)	272	185
Owner-occupied Housing Units	573	567
Renter-occupied Housing Units	-1	287

Source: U.S. Census Bureau

Table 3
Demographic Trends for Protected Classes
(Percent Change), 1990–2010

	1990- 2000	2000- 2010
Total Population	118.4%	61.7%
White (not Hispanic)	112.2%	57.4%
Black (not Hispanic)	_	190.9%
Asian (not Hispanic)	175.0%	145.5%
Hispanic/Latino	528.0%	112.7%
Minority	456.4%	149.8%
Total Households	105.9%	76.8%
Households with Children <18	117.7%	56.8%
Households with Persons 65+	66.3%	86.5%
Single Parent with Children < 18	44.8%	261.9%
Large Families (5+ persons)	147.8%	40.6%
Owner-occupied Housing Units	125.1%	55.0%
Renter-occupied Housing Units	-1.2%	354.3%

Source: U.S. Census Bureau

<sup>&</sup>lt;sup>2</sup> The disability data account for only the population ages 5 and older, since Census 2000 did not gather disability data on the population under 5. The margin of error for the 2000 data was calculated using the methodology described in the Census 2000 Summary File 3 Technical Documentation. The margins of error for the disability data are associated with 90% confidence intervals.

The 2010 data was derived from the 2009-2011 American Community Survey 3-year estimates by aggregating only the age groups older than 5. However, the 2009-20 ACS did not include disability data on Bluffdale due to the city's small population size.

Table 4 lists the average household sizes in Bluffdale by race and ethnicity. While the citywide average household size increased from 3.88 in 1990 to 4.23 in 2000 before declining to 3.86 in 2010.

Interestingly, after a surge in average household sizes in 2000, the non-Hispanic white and Hispanic/Latino average household sizes in 2010 returned to 1990 levels of 3.9 and 3.5, respectively. However, note that the volatility of Hispanic average household sizes could be partly due to the low number of Hispanic households in Bluffdale.

Race/Ethnicity 1990<sup>1</sup> 2000 2010 White (not Hispanic) 4.21 3.88 3.88 Hispanic/Latino<sup>2</sup> 3.50 5.14 3.49 **Total Population** 3.88 4.23 3.86

Table 4

Average Household Size by Race/Ethnicity in

Bluffdale, 1990-2010

<sup>1</sup> The average household size was not a metric available in the 1990 Census Summary Tape File 2B. Thus, the average household size was calculated by taking the average of the distribution of household sizes for each race/ethnicity. However, since the upper limit of the household size was capped at 9 or more persons, households in this group were assumed to have 9 members for the purposes of calculating the average. This methodology could lead to slight underestimations of the actual average household size. For 2000 and 2010, the average household size was available as a metric without further calculation.

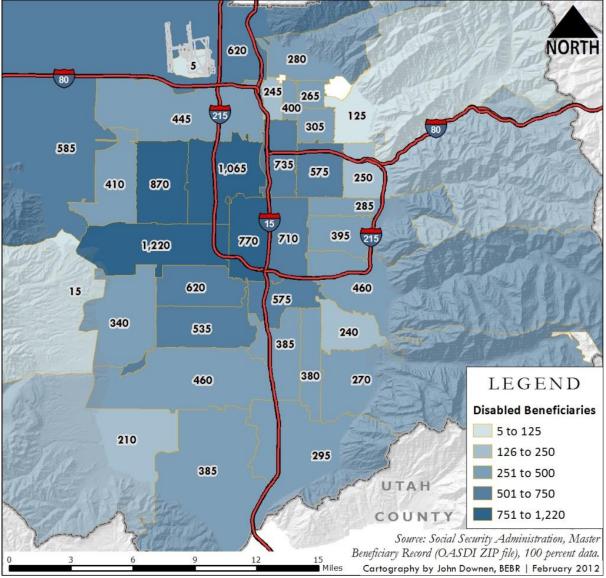
Source: U.S. Census Bureau

The higher average household sizes among minority groups could pose difficulties in finding affordable and adequately sized rental locations in addition to incurring higher rent burden. Thus, limited selection and affordability of rental units with three or more bedrooms could disproportionately affect minority groups. However, given the few number of minority households in Bluffdale, the average minority household size has been relatively volatile, making it difficult to compare with the non-Hispanic white average household size.

BLUFFDALE: FAIR HOUSING EQUITY ASSESSMENT

 $<sup>^2</sup>$  There were only 8, 21, and 69 Hispanic/Latino households in 1990, 2000, and 2010, respectively. The volatility in the average household size is partly due to the relatively low number of Hispanic/Latino households. The average household sizes for other minority groups are not shown in the table above due to the low numbers of these households.

Figure 2
Beneficiaries of Social Security Disability by Zip Code in Salt Lake County, 2010



The number of social security disability beneficiaries in Salt Lake County is shown in Figure 2 at the zip code level. The beneficiaries are heavily concentrated in West Valley, Taylorsville, and Kearns as well as parts of South Salt Lake and Murray.

#### SEGREGATION

Homeownership rates in Bluffdale in 2010 have fallen below 1990 levels of 85 percent (Table 5). The homeownership rates among non-Hispanic white and minorities have increasingly diverged since 1990. One caveat is that the number of minority households in Bluffdale has been below 100 during this time period, so the minority homeownership rates are more volatile.

Table 5
Homeownership Rate by Race/Ethnicity
in Bluffdale, 1990-2010

# Table 6 Rental Tenure Rate by Race/Ethnicity in Bluffdale, 1990-2010

Race and Ethnicity	1990	2000	2010	
White (not Hispanic)	84.9%	93.2%	82.5%	Whit
Minority	77.8%	75.0%	56.8%	Mino
Total	84.8%	92.7%	81.3%	Total

 Race and Ethnicity
 1990
 2000
 2010

 White (not Hispanic)
 15.1%
 6.8%
 17.5%

 Minority
 22.2%
 25.0%
 43.2%

 Total
 15.2%
 7.3%
 18.7%

Source: U.S. Census Bureau

Source: U.S. Census Bureau

Given the low number of minority households, the minority groups are not further disaggregated for the purposes of calculating tenure rates. Bluffdale only had 9, 28, and 95 minority households in 1990, 2000, and 2010, respectively.

Table 7 and Table 8 include the composition of total households and rental households, respectively, by race and ethnicity. The non-Hispanic white share of rental households in Bluffdale has become increasingly lower than the share of total households. In 1990, 98 percent of both rental and total households were headed by non-Hispanic whites. However, in 2010, while the non-Hispanic share of total households only decreased to 95 percent, the non-Hispanic white share of rental households constituted a disproportionately lower 89 percent. This means that the rental composition by race and ethnicity has diverged from the overall household demographics in Bluffdale. Minorities now represent slightly over 11 percent of all rental households yet comprise less than 5 percent of the total households in the city.

Figure 3 shows the dot density of the Salt Lake County minority population by census block for 2000 to 2010. In 2000, the highest concentrations of minorities are in Salt Lake City's west-side River District neighborhoods, West Valley City, and Kearns (unincorporated area west of Taylors-ville). In addition to these areas, which had even higher minorities concentrations in 2010, Cotton-wood Heights, South Salt Lake, Taylorsville, and West Jordan have experienced a larger influx of minorities in the past decade. The cities in the southern end of the county have very few areas of minority populations. As shown in Figure 4, both census tracts in slowly increased its minority share from 2000 to 2010.

Table 7
Total Households by Race and Ethnicity in Bluffdale, 1990–2010

	1990		2000	)	2010		
Race and Ethnicity	Number of Households	% Share	Number of Households	% Share	Number of Households	% Share	
White (not Hispanic)	531	98.3%	1,084	97.5%	1,871	95.2%	
Minority	9	1.7%	28	2.5%	95	4.8%	
Hispanic/Latino	8	1.5%	21	1.9%	69	3.5%	
Non-Hispanic Minority	1	0.2%	7	0.6%	26	1.3%	
American Indian	1	0.2%	_	_	2	0.1%	
Asian or Pacific Islander	0	0.0%	_	_	9	0.5%	
Asian	_	_	_	_	5	0.3%	
Pacific Islander	_	_	_	_	4	0.2%	
Black	0	0.0%	_	_	4	0.2%	
Other Race	0	0.0%	_	_	3	0.2%	
Two or More Races	_	_	_	_	8	0.4%	
Total	540	100.0%	1,112	100.0%	1,966	100.0%	

Note: For the 1990 data, the number of households by race and ethnicity of householder is not further disaggregated to distinguish between Asian and Pacific Islander. The number of households is not disaggregated in the 2000 data for racial and ethnic groups with low population size.

Source: U.S. Census Bureau

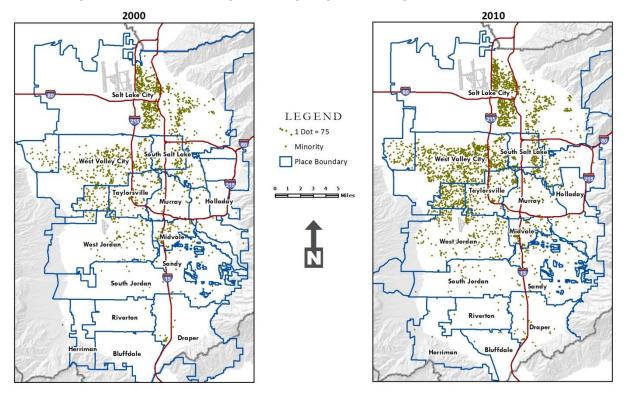
Table 8
Rental Households by Race and Ethnicity in Bluffdale, 1990–2010

	1990		2000	)	2010		
Race and Ethnicity	Number of Households	% Share	Number of Households	% Share	Number of Households	% Share	
White (not Hispanic)	80	97.6%	74	91.4%	327	88.9%	
Minority	2	2.4%	7	8.6%	41	11.1%	
Hispanic/Latino	2	2.4%	6	7.4%	30	8.2%	
Non-Hispanic Minority	0	0.0%	1	1.2%	11	3.0%	
American Indian	0	0.0%	_	_	0	0.0%	
Asian or Pacific Islander	0	0.0%	_	_	4	1.1%	
Asian	_	_	_	_	0	0.0%	
Pacific Islander	_	_	_	_	4	1.1%	
Black	0	0.0%	_	_	3	0.8%	
Other Race	0	0.0%	_	_	2	0.5%	
Two or More Races	_	_	_	_	2	0.5%	
Total	82	100.0%	81	100.0%	368	100.0%	

Note: For the 1990 data, the number of households by race and ethnicity of householder is not further disaggregated to distinguish between Asian and Pacific Islander. The number of households is not disaggregated in the 2000 data for racial and ethnic groups with low population size.

Source: U.S. Census Bureau

Figure 3
Dot Density of Salt Lake County Minority Population by Census Block, 2000 to 2010



Source: U.S. Census Bureau, 2000 and 2010 Censuses; Utab Automated Geographic Reference Center.

Cartography: John Downen, BEBR | June 2012

# Figure 4 Percent of Minority Population by Tract in Bluffdale, 2000 to 2010

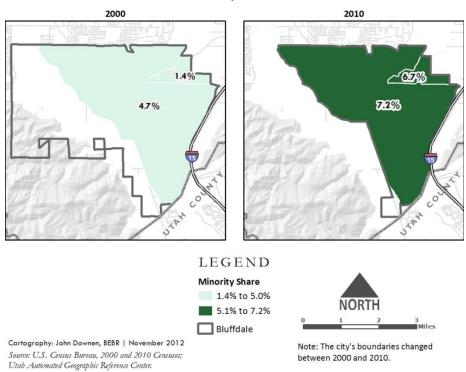


Figure 5
Minority Owner-Occupied Units in Bluffdale – 2010

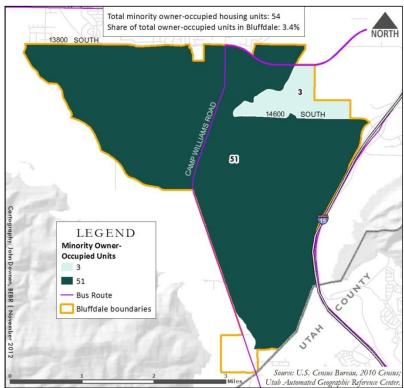


Figure 5 shows the number of minority occupied units by census tracts in Bluffdale. In 2010, Bluffdale only had 54 minority owner-occupied units, which constituted 3.4 percent of the total owner-occupied units in the city.

Figure 6
Share of Owner-Occupied Units in Bluffdale
Occupied by Minority Household – 2010

Figure 6 provides the percent of owner-occupied units that are minority households. As shown in Figure 6, the minority share of owner-occupied units in the two census tracts are 2.5 and 3.5 percent. However, the minority share of the total population is at a higher share of 7.1 percent.

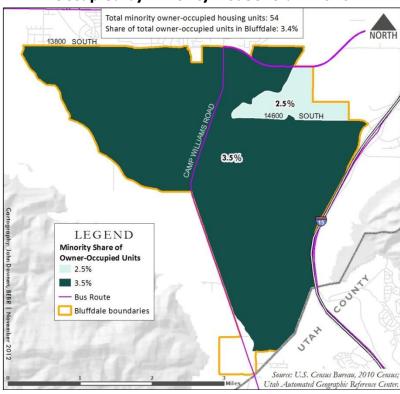


Figure 7
Minority Owner-Occupied Units and Proximity to Low-Wage Jobs Bluffdale, 2010

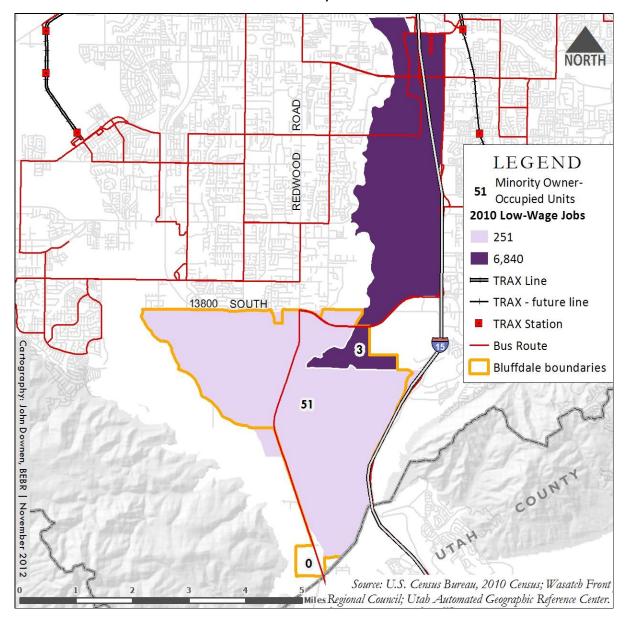


Figure 7 overlays the density of low-wage jobs (in shades of purple) with the number of minority owner-occupied units. The red lines in Figure 7 represent the bus routes in the region. The small northeastern region in Bluffdale, which used to be its own census tract in 2000, has been merged with the western part of Draper. There are over 6,800 low-wage jobs in this region combining west Draper and northeast Bluffdale. However, Bluffdale has only one bus route, which runs through the center of the city with access to Draper. There are no bus routes that connect to other surrounding cities such as Riverton, located directly north of Bluffdale.

Figure 8
Minority Renter-Occupied Units by Tract in
Bluffdale - 2010

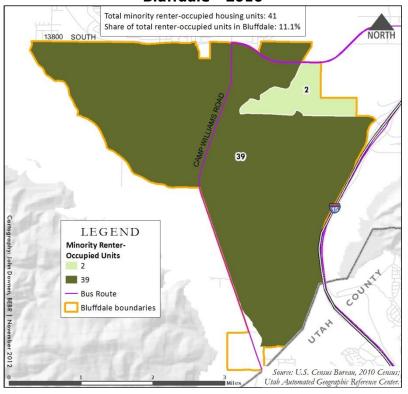
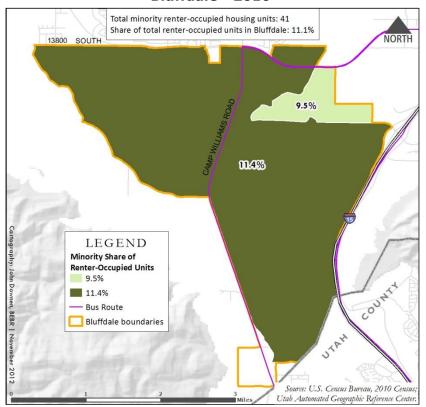


Figure 8 shows the number of minority renter-occupied units in Bluffdale. Only two minority rental units are located in the northeast corner of the city. Roughly 43 percent of the 95 minority households in Bluffdale are in rental units.

Figure 9
Minority Share of Renter-Occupied Units by Tract in Bluffdale - 2010

Figure 9 shows the minority share of renter-occupied units in Bluffdale. The minority rental units in Bluffdale constitute slightly over 11 percent of all rental units in the city, while the minority share of owner-occupied unit is only 3.4 percent. This shows that minorities represent a disproportionately high share of the rental house-hold population in Bluffdale.



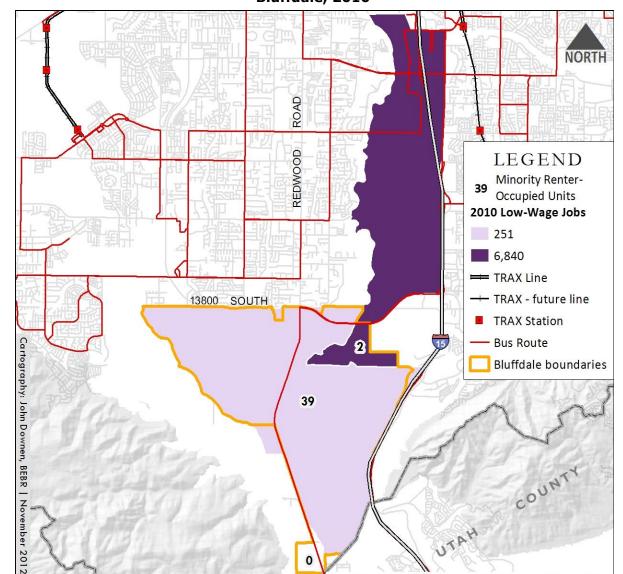


Figure 10
Minority Renter-Occupied Units and Proximity to Low-Wage Jobs in Bluffdale, 2010

Figure 10 overlays the density of low-wage jobs with the number of minority rental units. Most of the rental units are not in the northeastern corner, the area with proximity to low-wage jobs on the west side of Draper. The single bus route that runs through Bluffdale provides very limited public transportation to employment centers in the surrounding cities.

Source: U.S. Census Bureau, 2010 Census; Wasatch Front

Miles Regional Council; Utah Automated Geographic Reference Center.

Table 9
Predicted Racial/Ethnic
Composition Ratio
Bluffdale

	Perc Hous	Actual/ Predicted	
	Actual	Ratio	
Minority	11.2%	12.2%	0.92
Asian	0.0%	2.0%	0.00
Black	0.0%	0.8%	0.00
Hispanic/Latino	10.1%	7.7%	1.32

Source: HUD Spreadsheet for Sustainable Communities Grantees

#### **Actual/Predicted Ratio Scale**

Value Ranges	Interpretation of Actual Share
0-0.5	Severely Below Predicted
0.5-0.7	Moderately Below Predicted
0.7-0.9	Mildly Below Predicted
0.9-1.1	Approximates Predicted
> 1.1	Above Predicted

Table 9 shows that ratio between predicted and actual racial/ethnic composition in Bluffdale. The predicted percent of minority households is the expected composition based on the income distribution in the metropolitan area by race and ethnicity. The actual composition is based on the 2005-2009 American Community Survey 5-year estimates. This income-based methodology predicted a 2 percent Asian population and 0.8 percent black population, but the 2005-2009 ACS had point estimates of zero for these two groups. Thus, the actual/predict ratio of zero could not necessarily mean that the Asian and black populations are severely below predicted.

Table 10 compares the affordability of rental housing units in Bluffdale with the metro area for rental prices based on AMI. Affordability is based on the threshold that rent would not amount to more than 30 percent of total income.

Table 10
Fair Share Affordable Housing Index
Bluffdale

	Α	В	C	D	E	F
Income Level	Total Housing Units	Number of Affordable Rental Units	% of Affordable Rental Units in City (B/A)	% of Affordable Rental Units in Metro Area	Fair Share Need (D × A)	% of Fair Share Need (C/D)
<30% AMI	1,875	35	2%	6%	115	31%
30%-50% AMI	1,875	60	3%	12%	217	28%
50%-80% AMI	1,875	120	6%	19%	354	34%

Source: HUD Spreadsheet for Sustainable Communities Grantees

Note: The affordability for each income level is based on the threshold that gross rent will not amount to more than 30% of total income.

Only 2 percent of Bluffdale's total housing units are deemed affordable below the 30 percent AMI level. The percent of fair share need below the 30 percent AMI level is 31 percent, meaning that the city's share of affordable rental units at this income level is only 31 percent of the metro area's share. According to HUD's scale for the fair share affordable housing index, this means that Bluffdale's housing stock is extremely unaffordable for those with incomes below the 30 percent

### Percent of Fair Share Need Scale

Value Ranges	Interpretation of Actual Share
0-50%	Extremely Unaffordable
50-70%	Moderately Unaffordable
70%-90%	Mildly Unaffordable
90%-110%	Balanced Affordability
> 110%	Above Fair Share, Affordable

AMI threshold. Similarly, for income levels below 80 percent AMI, the city's housing stock is considered extremely unaffordable.

Figure 11 shows the number and share of single-family homes in Bluffdale census tracts that are affordable at 80 percent AMI in 2011. The percentages shown in Figure 11 are each census tract's share of the total affordable homes in the city. Affordability calculations are based on 30 percent of annual income, accounting for taxes, home insurance, and mortgage insurance. The maximum affordable single-family home price at 80% AMI is \$255,897. Nearly 96 percent of all affordable single-family homes in Bluffdale are located in the southwestern census tract (Figure 11), which has 94 percent of minority owner-occupied units (Figure 5) and 95 percent of minority rental units in the city (Figure 8).

BANGERTER HWY 4.1% 14600 SOUTH LEGEND City Affordability: 170 | 10.6% Affordable Homes 163 Bluffdale Note: Percentages shown are the tract's share of total affordable homes in the city. Source: Salt Lake County Assessor, Utah Automated Geographic Reference Center. Cartography: John Downen, BEBR | December 2012

Figure 11
Single-Family Homes Affordable at 80% AMI in Bluffdale, 2011

## Table 11 Dissimilarity Index

## Dissimilarity Index Scale

Group	Bluffdale	Salt Lake County	Value Ranges	Interpretation
Minority	0.35	0.43	≤ 0.40	Low Segregation
Hispanic/Latino	0.39	0.50	0.41-0.54	Moderate Segregation
Non-Hispanic Minority	0.45	0.41	≥ 0.55	High Segregation

Source: BEBR computations from 2010 Census

The dissimilarity index calculates the share of the minority group that would have to move to different census blocks in order to match the non-Hispanic white distribution in the respective geographic area. The Salt Lake County dissimilarity index was calculated using data from all incorporated cities and unincorporated areas.

The dissimilarity index is calculated as follows:

 $Dissimilarity (W, M)_{j} = \frac{1}{2} \sum_{i=1}^{N} \left| \frac{M_{i}}{M_{j}} - \frac{W_{i}}{W_{j}} \right|$ 

where

W = non-Hispanic population

M = minority population $i = i^{\text{th}} \text{ census block group}$ 

j = geographic area (city or county)

N = number of census blocks in geographic area j

Another measure of segregation is the dissimilarity index shown in Table 11. The dissimilarity indices for Bluffdale are below the county levels for minorities overall and Hispanics/Latinos. The non-Hispanic minority dissimilarity index is 0.45, slightly higher than the county-level index of 0.41. In order for the minority and non-Hispanic white geographic distributions in Bluffdale to be equivalent, 35 percent of minorities would have to move to other census blocks in the city. While the dissimilarity index itself does not provide any geospatial information about segregation, Figure 12 shows that the levels of dissimilarity at the census block level.

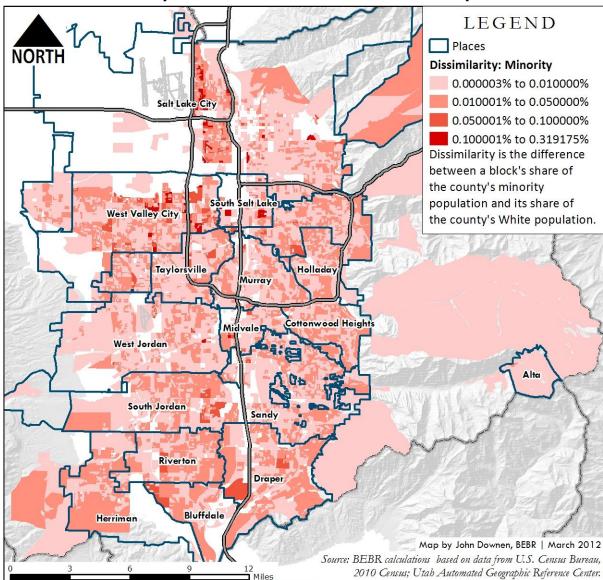


Figure 12
Dissimilarity Index for Minorities in Salt Lake County - 2010

Figure 12 shows the absolute difference between each census block's county share of the minority and non-Hispanic white population. These absolute differences are used to calculate the minority dissimilarity index in Table 11 for the county. Noticeably large dissimilarities between the minority and non-Hispanic white county shares at the block level are concentrated in Salt Lake City's River District, which are neighborhoods east of I-15. Some census blocks in West Valley and South Salt Lake also have dissimilarities greater than 0.1%. The northwestern corner of Bluffdale has higher levels of dissimilarity than other parts of the city.

#### RCAP

In 2010 there were 348 poor individuals, representing 4.7 percent of the Bluffdale population (Table 12). Of the poor people living in the city, 81 percent of them are non-Hispanic white, while the other 19 percent is comprised entirely of Hispanic families (Table 13). There were no poor blacks, Native Americans, Asians or Pacific Islanders living in Bluffdale in 2010. Hispanics in Bluffdale were more than twice as likely to be poor as a non-Hispanic whites living in the city. Yet only 10 percent of the 657 Hispanics were poor, which equates to only 66 individuals.

Table 12
Number and Share of Poor Persons by
Race and Ethnicity in Bluffdale

		Poor	Total	% Poor
Bluffdale	Black	0	0	0.0%
	Native Am.	0	64	0.0%
	Asian	0	0	0.0%
	Pacific Island	0	40	0.0%
	Hispanic	66	657	10.0%
	Total Minority	66	761	8.7%
	White	282	6652	4.2%
	Total	348	7413	4.7%

Source: HUD Spreadsheet for Sustainable Communities Grantees

Table 13
Poor in Bluffdale by Race and
Ethnicity – 2010

	Race/ Ethnicity	Persons	Share
Bluffdale	Black	0	0.0%
	Native Am.	0	0.0%
	Asian	0	0.0%
	Pacific Island	0	0.0%
	Hispanic	66	19.0%
	Total Minority	66	19.0%
	White	282	81.0%
	Total Poor	348	100.0%

Source: HUD Spreadsheet for Sustainable Communities Grantees

In Bluffdale the poor residents are fairly well dispersed across the city (Figure 13). There are no large concentrations within the city. However, many poor Hispanics tend to live east of the bus route along Camp Williams Road and south of 14600 South. The poor whites are sparsely populated evenly throughout the city. Not surprisingly, there are not any racially or ethnically concentrated areas of poverty as defined by HUD in the city of Bluffdale (Figure 14). The sparse distribution of poor residents in Bluffdale is not surprising, considering the low prevalence of poverty in the city in general. This combined with a small population of under 7,500 residents results in a low concentration of poverty. Then considering the few public transportation options and lack of urban centers in the city of any size, there is little reason for poor residents to be clustered together in any one area of the city.

Figure 13
Poor by Census Tract in Bluffdale, 2010

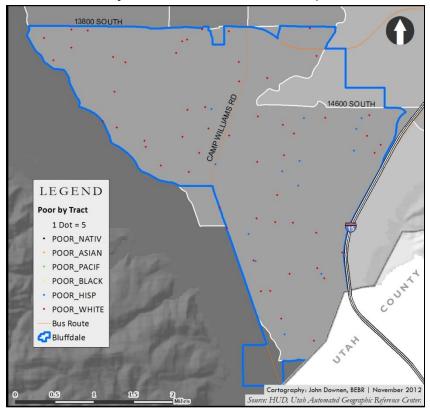
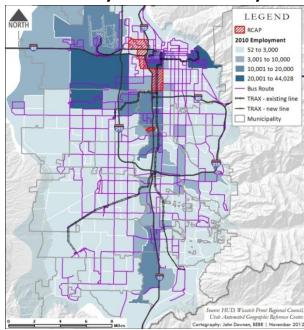


Figure 14
Racially Concentrated Areas of
Poverty in Salt Lake County



HUD defines a racially/ethnically concentrated area of poverty as a census tract with a family poverty rate greater than or equal to 40%, or a family poverty rate greater than or equal to 300% of the metro tract average, and a majority non-white population, measured at greater than 50%.

The following three figures (Figure 15, Figure 16 and Figure 17) show concentrations of poverty in Salt Lake County, estimated from the 2007-2011 American Community Survey. Here, an area of poverty is considered concentrated when it has three times the countywide average share of the population living below the county poverty line. The countywide average is approximately 11.6 percent, so an area is considered highly concentrated when it has 34.7 percent or more of the population living in poverty. Figure 15 overlays these areas of poverty with census tracts that have minority-majority populations, which are defined as having minority shares greater than 50 percent of the census tract population. Figure 16 overlays the concentrations of poverty with tracts that have a Hispanic population of 10 percentage points or more above the county's Hispanic share of 17.1 percent. Figure 17, on the other hand, overlays the concentrated areas of poverty with a county map showing the census tracts where the minority population is 10 percentage points above the county average of 26 percent. In all cases, the concentrated areas of poverty are north along Interstate 15 in Salt Lake City. None of the concentrations are in the city of Bluffdale, nor are there any census tracts with a Hispanic or minority population 10 percentage points higher than the county average, let alone a minority-majority share. The reason for this is the low population and even lower minority population in the city (Table 12), as well as the sparse composition of poor residents throughout the city (Figure 13).

LEGEND

2007-11 Share in Poverty >= 34.7%

2010 Minority Share >= 50.0%

Municipality

In 2007-11 the tract-level countywide average share of the population living below the poverty level was 11.6%. Three times this is 34.7%.

0 2 4 6 8 Miles

WIAH COUNTY

Source U.S. Granu Bureau, 2007-2011 American Community Survey and 2010 Census: State of Utab, SGID.

Figure 15
Concentrations of Poverty and Minority Majority by
Tract in Salt Lake County, 2007-2011

Figure 16
Concentrations of Poverty and
Hispanics by Tract in Salt Lake
County, 2007-2011

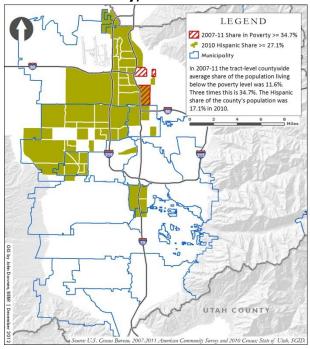


Figure 17
Concentrations of Poverty and
Minorities by Tract in Salt Lake
County, 2007-2011

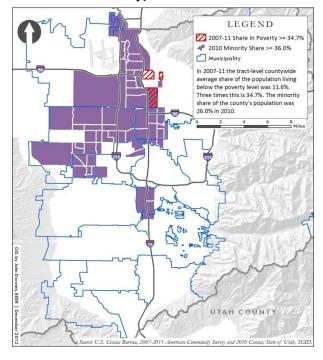


Figure 18
Subsidized Apartment Projects in Salt Lake
County, 2011

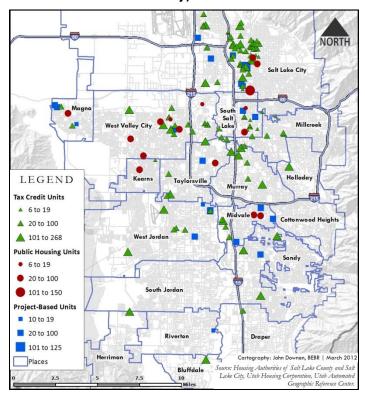


Figure 18 maps all the subsidized apartment projects in Salt Lake County. A majority of the projects, especially project-based units, are located in the central and northern ends of the county. As a result, only one tax credit-based project exists in the city of Bluffdale. Similarly, there are not any other subsidized apartment projects in close proximity to the Bluffdale border in the surrounding cities. The closest is to the north in one small project-based unit in northeastern Riverton. However, based on the small size of the poor population in Bluffdale, there is not a high demand for subsidized projects in the city. However this could change as urabn centers move south, public transit options increase in the southern end of the valley, and residents move further south. away from the northern downtown hubs.

In the entire city of Bluffdale in 2011, there were only six total Section 8 vouchers in use (Figure 19). The vouchers, four under the Salt Lake County Housing Authority and two under the Salt Lake City Housing Authority, are all located in the northern part of the city. One lone voucher is located more toward the center of the city, but still along the one bus route in the city that runs north to south, and not along the interstate. Overall, the options in Bluffdale are limited for low-income families relying on public transit for work, and therefore, only a small number of vouchers are used in the city.

Figure 19
Section 8 Vouchers in Bluffdale, 2011

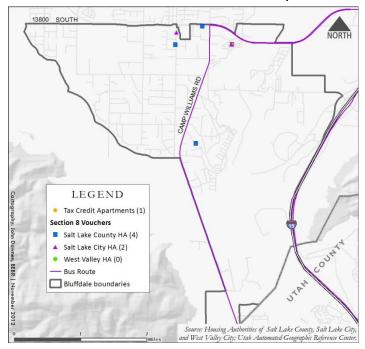


Table 14 displays the number of individuals receiving public assistance in Salt Lake County and the Bluffdale/Riverton area. Each count in 2007 and 2012 is a distinct individual living in that zip code receiving assistance from a state program such as food stamps, Temporary Assistance for Needy Families (TANF) or any other financial, medical or child care services from the Department of Workforce Services (DWS). DWS estimates its services capture at least 70 percent of all poor living in these areas; the other 30 percent may be living in poverty, but are not using any form of public assistance. Though the number of recipients increased in Bluffdale and Riverton by over a 1,000 residents, the percentage remained over 10 percent less than the county average. The number of individuals receiving public assistance in 2012 is mapped in Figure 20 by zip code. Each zip code with fewer than ten recipients was suppressed in the data, and each zip code without any residences or missing data are also removed. Overall, the number of recipients ranged from under 10 to over 18,000 in a single zip code in 2012. While a few zip codes declined in the number of recipients, most increasing by over 50 percent, in all regions of the county. It should be noted that the zip codes used in the public assistance maps are based on the U.S. Census Bureau's zip code tabulation areas (ZCTAs), which do not exactly correspond to the zip code boundaries used by DWS. Regardless, the general trends of public assistance recipients as a share of a region's population can be seen.

Table 14
Distinct Individuals on Public Assistance, 2007-2012

	Zip	2007	2012	Absolute	Percentage
City	Code	Individuals	Individuals	Change	Change
Bluffdale/Riverton	84065	3,179	4,312	1,133	35.6%
Salt Lake County		146,699	215,426	68,727	46.8%

Figure 20 Individuals Receiving Public Assistance by Zip Code, 2012

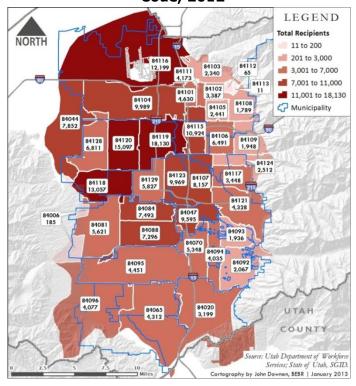


Table 15 uses the same DWS data on public assistance to calculate the number of large-family households on public assistance in 2007 and 2012. A large family size is defined as a household of five or more individuals living together. Countywide, the number of large families receiving public assistance increased by about 61 percent over the past five years. Bluffdale's zip code percentage change is almost identical to the percentage change for the entire county at exactly 61 percent. Figure 21 displays the concentrations of these large families by zip code in Salt Lake County.

Table 15
Large Family Households on Public Assistance, 2007-2012

City	Zip Code	2007 Family Size ≥5	2012 Family Size ≥5	Absolute Change	Percentage Change
Bluffdale/Riverton	84065	911	1,467	556	61.0%
Salt Lake County		30,473	49,019	18,546	60.9%

Figure 21
Number of Large Families by Zip Code Receiving Public
Assistance, 2012

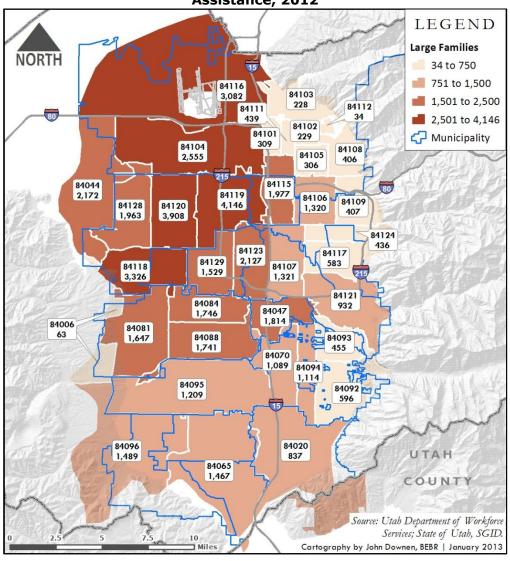


Table 16 shows the number of disabled individuals receiving public assistance in 2007 and 2012. To be considered disabled and on public assistance by DWS standards, each individual must be receiving financial assistance and have a medical condition verified by the Medical Review Board. Not surprising, the number of disabled individuals on public assistance increased between 2007 and 2012 by about 21 percent. However, the city of Bluffdale and Riverton experienced a fraction of this change with only 5 more individuals, accounting for a 1.4 percent increase. Figure 22 maps the number of disabled individuals on public assistance in 2012 by zip code in Salt Lake County.

Table 16
Disabled Individuals on Public Assistance, 2007-2012

City	Zip Code	2007 Disabled	2012 Disabled	Absolute Change	Percentage Change
Bluffdale/Riverton	84065	346	351	5	1.4%
Salt Lake County		21,460	25,942	4,482	20.9%

Figure 22
Disabled Recipients Receiving Public Assistance by Zip Code, 2012

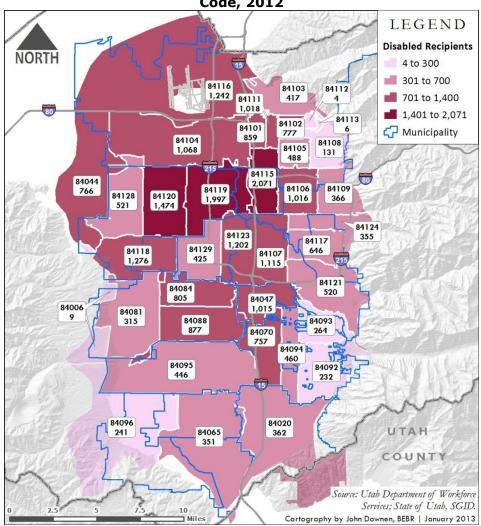


Table 17 uses the DWS data for the number of Hispanic individuals who received public assistance from the state in 2007 and 2012. The highest number of individuals is in the northern and western cities of Salt Lake City, West Valley City and South Salt Lake. Overall, more than 8,000 more Hispanic individuals received public assistance in 2007 than 2012, but only 36 more lived in Bluffdale/Riverton. This means the percentage of Hispanic individuals living in the zip code that includes Bluffdale increased by 7 percentage points fewer than the county total. Figure 5 maps the number of Hispanic recipients in 2012 by zip code in Salt Lake County.

Table 17
Hispanic Individuals on Public Assistance, 2007-2012

City	Zip Code	2007 Hispanic	2012 Hispanic	Absolute Change	Percentage Change
Bluffdale/Riverton	84065	250	286	36	14.4%
Salt Lake County		37,911	46,019	8,108	21.4%

Figure 23
Hispanic Recipients of Public Assistance by Zip Code, 2012

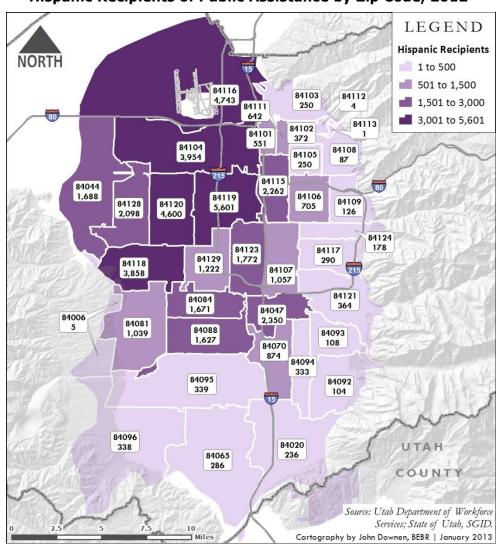
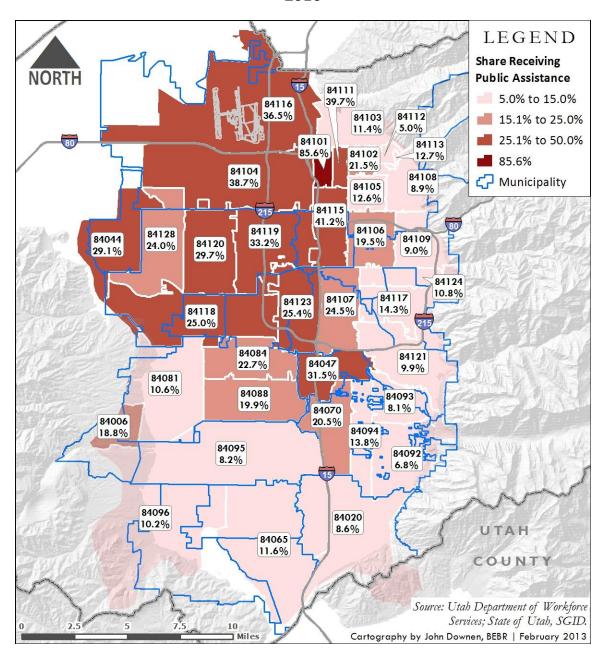


Figure 24 maps the percentage of individuals receiving public assistance in each zip code in Salt Lake County. Again, there is a clear difference between the northern and southern halves of the county. Much lower proportions of the populations in the southern cities such as Bluffdale are recipients of some form of public assistance from the state.

Figure 24
Percent of Individuals Residing in a Zip Code Receiving Public Assistance, 2010



#### DISPARITIES IN OPPORTUNITY

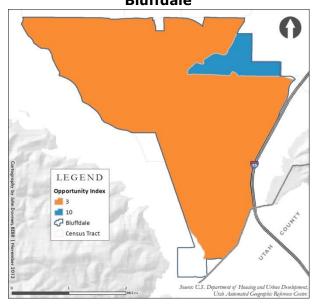
HUD provided six measurements of opportunity for each census tract with which to quantify the number of important "stressors" and "assets" that influence the ability of an individual or family to access and capitalize on opportunity. These six measures were aggregated to the city level using the population of each census tract within the city boundaries of Bluffdale. The city received an opportunity score of 3 (Table 18). With a one representing the lowest opportunity, a 3 is on the lower end of the opportunity scale, almost a full two points below the county average. The two stressors most negatively affecting the city are poor job access and low housing stability. The most positive indicator is that of relatively low levels of poverty, which is also the only indicator that ranks above the county average. These three factors are also highly correlated as many people living in poverty rely on public transit and urban centers with entry-level and low-wage jobs for employment. Bluffdale lacks both of these options, with very few public transit options and entry-level jobs. As a result, it is not feasible for many poor residents to live in Bluffdale without significant public assistance, and even then it does not seem economically viable. Even the school opportunity index in the city is low, which is not enticing those families seeking more educational opportunity for their children.

Table 18
Weighted, Standardized Opportunity Index

	School Proficiency	Job Access	Labor Market Engagement	Poverty	Housing Stability	Opportunity
Bluffdale	4.0	2.0	4.0	6.0	3.0	3.0
Salt Lake County	4.3	5.4	5.0	4.9	5.3	4.9

Source: HUD Spreadsheet for Sustainable Communities Grantees

Figure 25
Opportunity Index by Census Tract in Bluffdale



As Figure 25 illustrates, there are only two census tracts in Bluffdale, and one small corner in the southwest corner, just to the west of Camp Williams with no residents. Despite this, the difference between the two census tracts is 7 full points, with the much smaller northeast tract scoring a full 10 points on HUD's opportunity index. Due to the population size differences between each of the tracts, the weighted average opportunity score for the entire city of Bluffdale is still only a 3. The much smaller higher-opportunity tract only consists of one small neighborhood, open space and businesses, as compared to 7,398 residents living in the other census tract. Therefore, the ranking of this northeastern tract is almost negligible compared to the rest of the city.

Figure 13 maps the active childcare centers in Salt Lake County by capacity. The larger the dot is on the map, the higher the maximum capacity of the center. Access to daycare can be considered an

advantage in terms of fair and equitable housing as well as access to opportunity for many reasons. For one, if a household relies on low-wage jobs for stability, it is valuable to have affordable child-care so that adults are able to earn income for their families. Similarly, without access to childcare, more parents will be forced to stay at home with their children, thereby forgoing potential earned wages. This is especially important for Hispanic families, whose countywide average household size has increased from 3.14 in 1990 to 3.94 in 2010 (Table 4), while the overall countywide average household size has remained stagnant at roughly three members. As a result, a lack of adequate childcare can restrict a family's mobility and the amount of time they can invest in opportunities outside the home. This can present an impediment to housing choice for minorities, larger families, and low-income households. As it can be seen in Figure 13, Bluffdale does not have any large-scale childcare centers in the city. Similarly, there is only one childcare center in a neighboring city along a bus route in the city of Draper. All others in neighboring cities are farther than reasonably possible to travel to on a regular basis without adequate and reliable personal transportation. Even this, however, can get costly as cars and gas can be a burden on household expenses, as well as a larger time commitment by the child's guardians and most likely income earners.

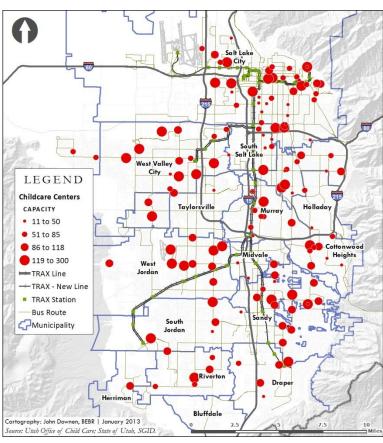


Figure 26 Childcare Centers in Salt Lake County, 2010

Each dot represents childcare centers only, and does not include any licensed family or residential certificate providers. Those providers are protected under GRAMA and their location is not public information. However, each licensed provider in a private residence may have up eight to children in their care.

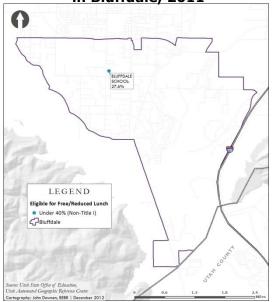
As a further assessment of opportunity in Bluffdale, an index is created as a representation of opportunity with K-12 public schools in Salt Lake County. This is done by summing two normalized, positive indicators, percent proficiency in language arts and science for elementary, middle and high schools. Subtracted from this indicator is the summation of four negative proxies for home environment and educational quality: free and reduced lunch percentage, percentage of minority students, percentage of students with limited English proficiency parents and average classroom size. Each school containing data on all of these indicators is ranked based on their normalized index score by the county. From there, the ranking is split into decile ranks across the county, with a score of 10 representing the highest opportunity score. Overall, there are 204 schools with complete data on all indicators, one of which is located in Bluffdale (Table 19). The one school, Bluffdale School, is the only public school in the city, yet is ranked fairly highly at 68th in the county and received a score of 7. It is important to note that even though this one public school receives a relatively high opportunity score, it is the only public school in the entire city. As a result, low-income families would have a hard time transporting their kids to this school if they lived farther away. Similarly, as the school is an elementary school, low-income residents would have to find transportation for themselves and their children to and from schools in neighboring cities once they graduate onto higher levels. Due to their income restraint, low-income families, especially those from protected classes and immigrants unfamiliar with the area are often unable to afford the private school options and instead rely on public institutions. As a result, the overall school opportunity index from HUD for the city of Bluffdale is rated quite low for overall access to opportunity (Table 18).

Table 19
Bluffdale School Opportunity

District School		County Ranking	Opportunity Index
Jordan	Bluffdale School	68	7

Source: BEBR computations from Utah State Office of Education data

Figure 27
Free/Reduced Lunch Eligibility
in Bluffdale, 2011



The following five figures (Figure 27, Figure 28, Figure 29, Figure 30, Figure 31) each depict most the elements of the school opportunity index, the exception being the exclusion of class size due to the minute changes between schools. As it can be seen, less than 30 percent of the student body at Bluffdale's one reported school is eligible for free and reduced lunch. Similarly, the minority share of students is below a tenth of the population, and the share of students with limited English proficiency parents is only about 1 percent. At the same time, the percent proficiency for both language arts and science are over 70 percent, making Bluffdale School a relatively high access to opportunity school. However, because it is the only school in the entire city, it leaves the city overall with a low access to capitalize on opportunity for low-income and minority students in the city who have no choice but to attend public schools.

Figure 28
Share of Students Proficient in
Language Arts in Bluffdale Public
Schools - 2011

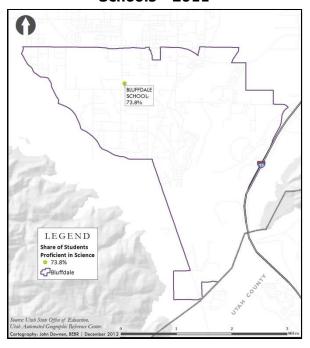


Figure 29
Share of Students Proficient in Science in Bluffdale Public Schools - 2011

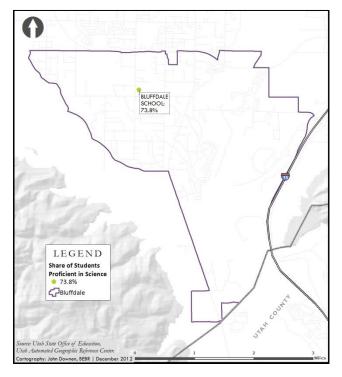


Figure 30 Minority Share of Enrollment in Public Schools in Bluffdale - 2011

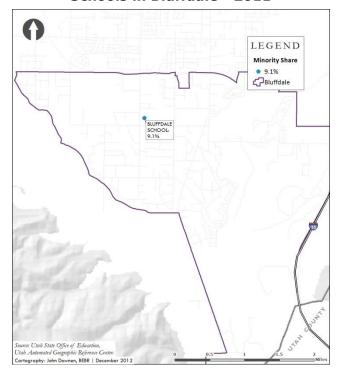
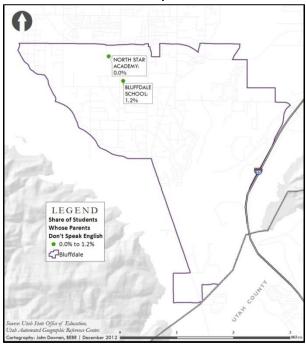


Figure 31
Share of Students with Parents of
Limited English Proficiency in
Bluffdale, 2010



One way to measure the racial and ethnic diversity of an area is to use readily available, public school enrollment data. Every year, the Utah System of Education collects data on the fall enrollments of each school in the state. Included in this data collection is data on race and ethnicity of each student enrolled in a public school in grades K through 12. In one particular survey, it allows each student to choose only a single race/ethnicity category or select a multi-race category, creating distinct count per student. Allowing each student to only be classified by one race/ethnic category eliminates the issue of double counting individual students who identify as more than one distinct race. This allows for a unique analysis of racial and ethnic makeup of public schools in Utah. Similarly, the number of minority students enrolled in public schools can be used as a proxy for estimating the diversity of families residing in each city. Table 20 shows the racial and ethnic composition of students enrolled at each school in Draper, Herriman, and Bluffdale.

Table 20 Enrollment Percentage by Race in Public Schools, 2011

		African	American Indian/				
		Am or	Alaskan		Hispanic	Multi-	Pacific
School	Minority	Black	Native	Asian	/ Latino	Race	Islander
Herriman School	4.9%	0.3%	0.5%	0.6%	1.5%	1.4%	0.6%
Butterfield Canyon School	8.5%	0.5%	0.4%	0.6%	5.1%	1.2%	0.6%
Bluffdale School	9.1%	1.5%	0.1%	0.4%	4.2%	1.4%	1.5%
Draper School	9.5%	1.1%	0.1%	2.4%	4.1%	0.1%	1.6%
Willow Springs School	10.5%	0.1%	0.8%	1.9%	4.3%	2.3%	1.1%
Silver Crest School	12.6%	1.1%	0.1%	0.9%	6.9%	2.5%	1.0%
Fort Herriman Middle	12.8%	0.6%	0.5%	1.1%	7.2%	2.8%	0.6%
Oak Hollow School	14.5%	0.8%	0.2%	2.1%	7.7%	3.2%	0.4%
Herriman High	15.3%	1.0%	0.4%	1.0%	9.0%	2.7%	1.2%
South Park Academy	48.8%	4.7%	2.3%	4.7%	34.9%	0.0%	2.3%
Draper/Herriman/							
Bluffdale Totals	11.4%	0.8%	0.4%	1.2%	6.0%	2.1%	0.9%

Source: BEBR Computations from Utah State Office of Education Data

The enrollment data from the Utah State Office of Education from the years 2006-2007 and 2010-2011 provides enrollments in Salt Lake County public schools by race and ethnicity. The data comes from the Superintendent's Annual Report for each respective year and are matched based on school name, district and location. From there the data is separated by city, and in some cases, by township. If a school is not located inside an incorporated city, Kearns, or Magna, then they are included in the analysis for the closest city to their physical location. Though the data from each year is not organized or collected in the exact same manner, they are still comparable. Specifically, in 2007, there is a category for "unknown" ethnic/racial identity, whereas in 2011 there is no "unknown" category but there is a "multi-race" category. These two classifications cannot be assumed to be the same, as someone who claims to be "unknown" is not necessarily a multi-race individual. However, both of these categories were used in the calculation for total enrollments and total minority enrollments in each respective year.

When each ethnic group is disaggregated by school level, a few more trends become apparent in the southern cities of Draper, Herriman, and Bluffdale. Figure 32 shows the total enrollment change for each ethnicity by school level. It shows that even though there is a clear increase in all ethnic groups in these cities, the growth is heavily concentrated in the elementary schools. This could represent an influx of new minority families with young, school-aged children moving to the area to enroll their students in these public schools. The only decline in number of students is a very small decrease in

Pacific Islander enrollments of fewer than 10 in both middle and high schools. Nonetheless, it is clear that in terms of sheer numbers, the growth in young students and minority students seems to be in the Draper, Herriman and Bluffdale elementary schools.

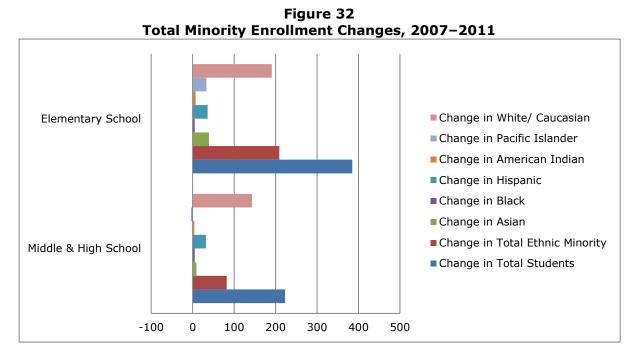


Figure 33 also displays the breakdown of ethnicities by school level, but measures the percentage change in enrollment from 2007 to 2011. Total minority enrollments increased in both elementary and secondary school levels, by roughly 69 percent and 77 percent, respectively. In both levels, Hispanic student enrollments more than doubled. Though the most substantial increase was among Pacific Islander enrollments, it equates to an increase of only 33 enrollments and a loss of 4 enrollments in middle/high schools. Due to the low numbers of minority students in Bluffdale schools, small enrollment increases can result in large percentage increases. Another significant note is the increase in non-Hispanic white students in both elementary and secondary schools. Many other cities in Salt Lake County are experiencing decreasing enrollments in non-Hispanic whites, despite an overall increase in number of students. However, this is not the case in Bluffdale, and therefore can indicate a growing population in the city, especially among households with school-aged children.

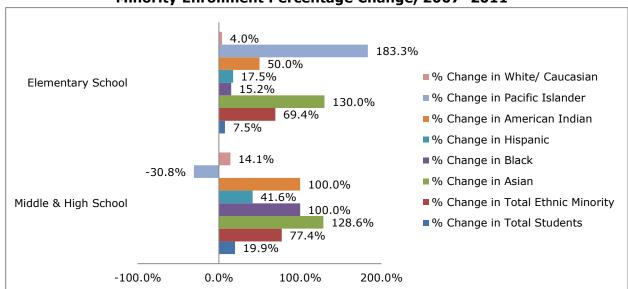


Figure 33
Minority Enrollment Percentage Change, 2007–2011

In accordance with Title VI of the Civil Rights Act of 1964, HUD recognizes persons who, as a result of national origin, do not speak English as their primary language and have a limited ability to read, write, or understand the language. As the major metropolitan center of the state, Salt Lake County must account for the percentage of Limited English Proficiency, or LEP, persons living in the county. According to data from USOE, there are concentrated areas of both high and low levels of LEP throughout the county. The nine public schools in Bluffdale, Herriman and Draper are in the bottom 25 percent of concentrations of students with LEP parents are in the three southern most cities in Salt Lake County. These cities are suburban communities located farthest from the metropolitan center of Salt Lake City and contains a total of nine public schools. As can be seen in Figure 34, the percentages of LEP parents range from 1.21 percent in Bluffdale at Bluffdale Elementary school to the highest of 5.22 percent at Silver Crest Elementary in Herriman.

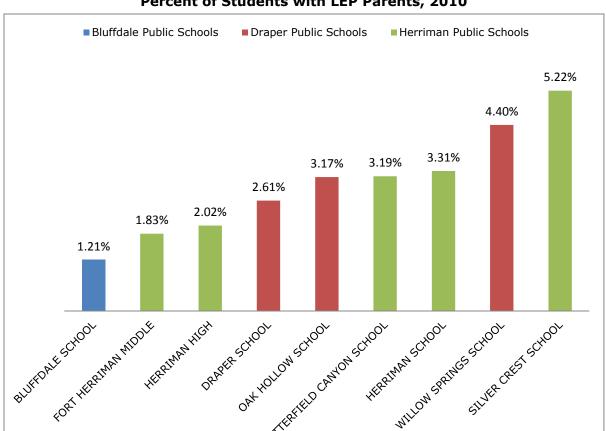


Figure 34
Percent of Students with LEP Parents, 2010

Figure 35 shows the assessed value of detached single-family homes by neighborhoods in Bluffdale. Much of the cities homes are valued at \$300,000 or more, with the most expensive homes along the southern borders of the city, tending to devalue slightly toward the middle. The lowest-valued home prices of under \$200,000 tend to be along the northern end of the city along Camp Williams Road. There are a few other areas about the city with high- and low-priced homes, but for the most part, the lowest-valued homes are in the north-central region of the city. As a result, there is not much in terms of affordability for lower-income families in need of a detached single-family home. Often-times, minority families, particularly those who are lower income, have larger family sizes and need more space in their home than an apartment, condo or even townhome can offer. As a result, there really are not many options for these protected classes to afford to buy a home in the city off Bluffdale, thus lowering their access to the potential economic, social and geographical benefits of living in the city of Bluffdale.

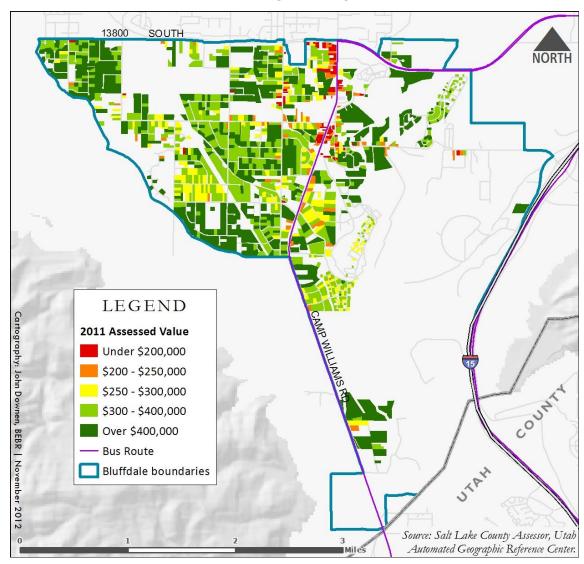


Figure 35
Assessed Value of Detached Single Family Homes in Bluffdale - 2011

Foreclosed homes have not only a negative effect on residents who lost their homes, but can also negatively affect neighboring homes and real estate values in the area. Table 21 estimates the percentage of the owned housing stock that was foreclosed on in the last few years for Salt Lake County. The calculations use total foreclosures between 2008 and 2012 from the Wasatch Regional Front Multiple Listing Service, and the total owned homes from the 2010 U.S. Census as the best approximation of the total housing stock in a zip code. Overall, zip code 84065, covering Bluffdale and Riverton, saw one of the highest foreclosure rates in the entire county. This includes the neighboring zip codes in Draper as well as zip codes in the northwest in West Valley City, Magna and Salt Lake City's west side.

Table 21 Foreclosed Homes in Salt Lake County, 2008-2010

			Total	
	Zip Code	Total	Foreclosures for	Share of
	Tabulation	Owned	2010 ZCTA	Foreclosed
City	Area	Units	(2008-2012)	Homes
Bluffdale/Riverton	84065	8534	296	3.47%
Cottonwood Heights (and Big	84121	11692	168	1.44%
Cottonwood)				1.44%
Draper	84020	8852	374	4.23%
Herriman	84096	7597	288	3.79%
Holladay	84117	6588	64	0.97%
Magna Township	84044	6194	254	4.10%
Midvale	84047	5739	126	2.20%
Millcreek/Parley's Canyon	84109	6773	57	0.84%
Murray	84107	6925	137	1.98%
Salt Lake City Total		39134	670	1.71%
Salt Lake City	84101	657	20	3.04%
Salt Lake City	84102	2401	39	1.62%
Salt Lake City	84103	4968	62	1.25%
Salt Lake City	84104	3926	137	3.49%
Salt Lake City	84105	5761	71	1.23%
Salt Lake City	84111	1302	28	2.15%
Salt Lake City	84112	1	0	0.00%
Salt Lake City	84113	0	0	_
Salt Lake City	84116	5944	163	2.74%
Salt Lake City (and Emigration)	84108	5648	32	0.57%
Salt Lake City (and Millcreek)	84106	8526	118	1.38%
Sandy Total	04100	28234	436	1.54%
Sandy	84070	5922	122	2.06%
Sandy (and Little Cottonwood)	84092	8318	138	1.66%
Sandy	84093	6738	74	1.10%
Sandy	84094	7256	102	1.41%
South Jordan	84095	12490	299	2.39%
South Sold Lake	84115	4173	114	2.73%
Taylorsville Total	04113	24345	597	2.45%
Taylorsville	84123	8509	97	1.14%
Taylorsville (and Kearns)	84118	15836	500	3.16%
Unincorporated (Brigham Canyon)	84006	228	2	0.88%
Unincorporated (Millcreek/Mt. Olympus)	84124	6034	64	1.06%
West Jordan Total	04124	26114	691	2.65%
	04001			
West Jordan	84081	9353	81	0.87%
West Jordan	84084	8868	347	3.91%
West Jordan	84088	7893	263	3.33%
West Valley City Total	04440	26302	791	3.01%
West Valley City	84119	9704	265	2.73%
West Valley City	84120	10246	281	2.74%
West Valley City	84128	6352	245	3.86%
Salt Lake County Zip Code 84129 had a total of 25 foreclosed ho	mas since its inc	235948	5428 2011. However, this tab	2.30%

Zip Code 84129 had a total of 25 foreclosed homes since its incorporation in 2011. However, this table uses the 2010 Zip Code Tabulation Areas (ZCTAs) from the 2010 Census, and therefore does not include 84129. However, this zip code was formed from parts of zip codes 84118, 84119 and 84084. There are 10,324 single-family parcels in 84129. Of these, 2,090 are in ZCTA 84084, 7,147 are in 84118, and 1,087 are in 84119. Assuming the 25 foreclosures in 84129 since July 2011 were evenly distributed across the area, these numbers are used to weight these foreclosures to the other/older zip codes. Thus the County totals should still equal the accurate total number of foreclosures, and ZCTA's 84118, 84119 and 84084 have 17, 3 and 5 additional foreclosures, respectively, added that are currently in the 84129 zip code.

Source: BEBR Calculations From Wasatch Front Regional Multiple listing Service and U.S. Census Bureau, 2010 Census

Figure 36 maps the share of the foreclosed homes in each zip code in Salt Lake County, based on the 2010 owned housing stock and Zip Code Tabulation Areas (ZCTAs) from the U.S. 2010 Census. Surprisingly, the largest shares of foreclosed homes are not concentrated in the northwestern zip codes of the county. Rather, the highest rates overall are on opposite ends of the county in both the northwest and southern zip codes. In fact, zip code 84065, which covers Bluffdale and Riverton has one of the highest foreclosure rates in the county. This is despite Bluffdale's relatively low share of low-income residents (Table 12) and could be due to families wanting to live in Bluffdale but unable to afford their mortgage after the recession in the late 2000's.

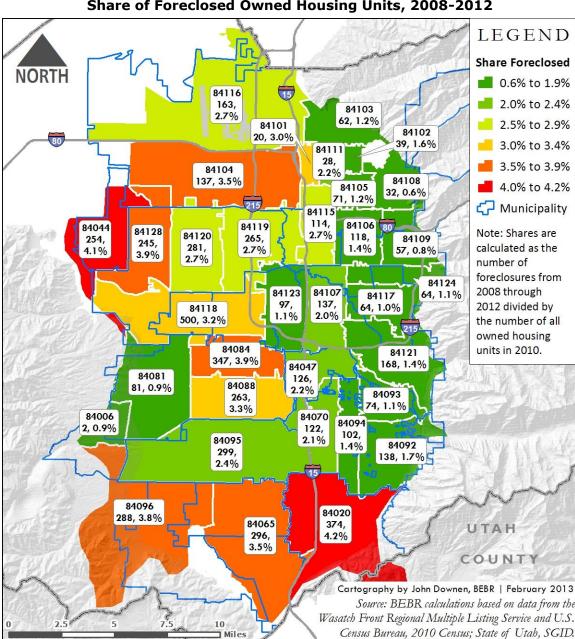


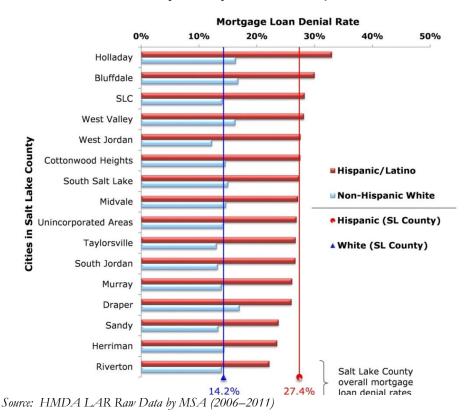
Figure 36
Share of Foreclosed Owned Housing Units, 2008-2012

## **Lending Practices**

The disparities in homeownership across racial and ethnic lines reflect only the symptoms of underlying impediments in the home mortgage application process. The Home Mortgage Disclosure Act (HMDA) data was compiled for Salt Lake County to better understand the barriers that members of the protected class face in obtaining mortgages. For illustrative proposes, non-Hispanic white applicants were compared with Hispanic/Latino applicants for most metrics derived from the HMDA data. Homeownership and housing stability are two dimensions of housing opportunity that can be assessed using this data by examining mortgage application outcomes and the high-interest lending practices.

Figure 37 shows the overall mortgage denial rates from 2006 to 2011 by race and ethnicity for each city in Salt Lake County. The vertical reference lines in Figure 37 mark the county-level overall denial rates for nonwhite Hispanic Hispanic/Latino applicants, which are 14.2 and 27.4 percent, respectively. Bluffdale and Holladay have the highest Hispanic denial rates in the county, averaging over 30 per-Note that the cent. two cities only account for only 0.6 percent of total Salt Lake County mortgage applications for Hispan-In fact, Bluffdale received only 30 His-

## Figure 37 Percent of Mortgage Loan Applications Denied by Race/Ethnicity in Salt Lake County Incorporated Cities, 2006–2011



panic/Latino applications from 2006 to 2011. However, other cities with high mortgage application rates among Hispanics have similar denial rates. Salt Lake City and West Valley City, which account for 45 percent of the county's Hispanic mortgage applications, have Hispanic denial rates slightly above the overall Hispanic denial rate at the county level. In other words, while the Hispanic denial rates in southern and eastern cities in the county might deviate from the overall Hispanic denial rate due to low Hispanic application volume, the Hispanic denial rates are significantly higher than those among non-Hispanic white applicants for all cities in Salt Lake County.

Figure 38
Percent of Mortgage Loan Applications (At or Below 80% HAMFI)
Denied by Race/Ethnicity in
Salt Lake County Incorporated Cities, 2006–2011

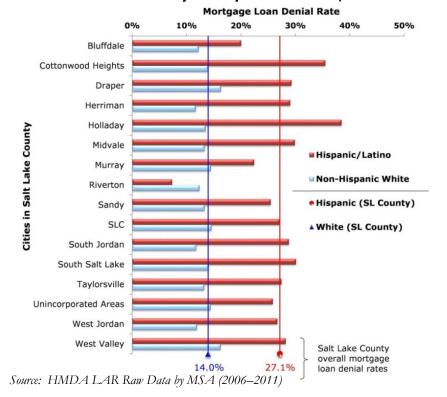
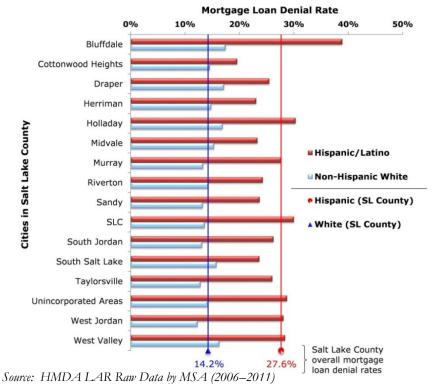


Figure 39
Percent of Mortgage Loan Applications (Above 80% HAMFI)
Denied by Race/Ethnicity in
Salt Lake County Incorporated Cities, 2006-2011



Despite the large gaps in denial rates between non-Hispanic white and Hispanic applicants shown in Figure 37, the inherent income differences between the two groups could be a contributing factor to this gap. However, as shown in Figure 38 and Figure 39, even when the denial rates are disaggregated by different income categories, the denial rate gap between the two groups persists. Figure 38 shows the denial rates among white and Hispanic applicants with reported incomes at or below 80 percent HAMFI (median family income), while Figure 39 shows the denial rates for applicants with reported incomes above 80 percent HAMFI. Note that the reported incomes for applicants from 2006 to 2011 are adjusted relative to the median family income for the year that they filed their mortgage applications.

The overall county-level denial rates do not change across groups. The Hispanic denial rate remains at levels above 27 percent, while the white denial rate is 14 percent—regardless of income bracket. At the city level, the denial rate gap between the two groups closely resembles that of the county. The only anomaly is Riverton, which has a lower Hispanic denial rate than that of non-Hispanic whites in the income category at or below 80 percent HAMFI (Figure 38). However, note that Riverton had only 41 Hispanic applications during this 6-year period with reported incomes at or below 80 percent HAMFI. Furthermore, over a fifth of these applications were withdrawn by the applicant. This withdrawal rate is twice as high as the overall county level for Hispanic applicants in this income bracket. Riverton's low Hispanic application volume and high application withdrawal rate could have contributed to the low Hispanic denial rate. Nonetheless, for applicants above the 80 percent HAMFI threshold, the denial rate gap in Riverton resurfaces.

While the denial gap is reduced from the low-income bracket (Figure 38) to the high-income bracket (Figure 38) for some cities such as Bluffdale, Cottonwood Heights, and Draper, the overall county denial gap does not change between these two income brackets. In the case of Cottonwood Heights, Bluffdale, and Draper, these three cities accounted for 10 percent for the county's non-Hispanic white applications but only 2.5 percent of the total Hispanic applications. On the other hand, the denial gap persisted across the two income brackets in Salt Lake City and West Valley City, which accounted for a quarter of the county's white applications and 45 percent of the total Hispanic applications. Thus, smaller cities might have some variability in denial rate gaps due to smaller application volumes, but the overall denial gap persists regardless of income bracket.

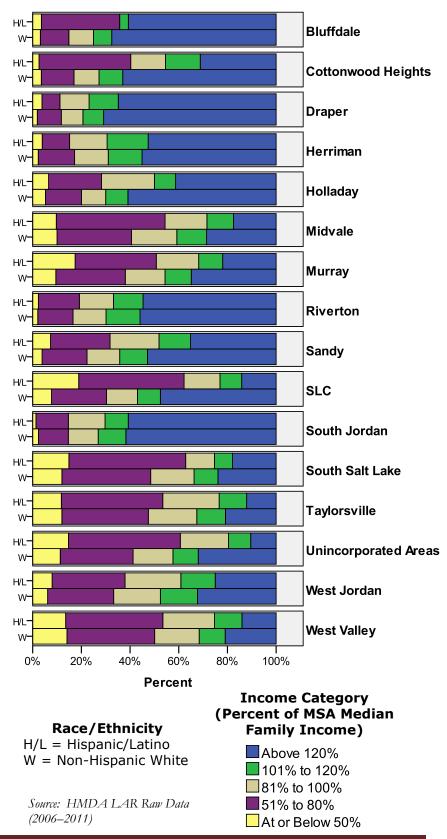
Given that Bluffdale has the lowest number of Hispanic/Latino applications among all incorporated cities in the county, lack of affordable housing and other fundamental housing impediments could be preventing members of protected classes from even entering the housing market. This trend could continue to exacerbate the disparity in homeownership rates between non-Hispanic white and minority residents. Thus, fair housing in Bluffdale must be analyzed not only from the lens of lending practices but only through an assessment of potential underlying factors that are impeding participation in the mortgage market among minorities and other members of the protected classes.

Figure 40 shows the applicant income distribution by race and ethnicity for each city in Salt Lake County. The income categories are based on the reported incomes as a percentage of the metropolitan statistical area median family income (MSA MFI). Each reported income has been adjusted as a percentage of the median family income for the year that the mortgage application was submitted.

The income distribution between the two groups selected Bluffdale properties differ the most at the 51 to 80 percent MFI level. While only 12 percent of non-Hispanic white applicants who selected Bluffdale properties from 2006 to 2011 reported incomes between 51 and 80 percent AMI, nearly a third of Hispanic/Latino applicants were in this income category. Nonetheless, the shares of applicants in the lowest and highest income levels among both groups are fairly similar.

On the other hand, the applicant income distribution for Salt Lake City differs significantly between the two groups. While 48 percent of the non-Hispanic white applicants who selected Salt Lake City properties have incomes above 120 percent of the MSA median family income

Figure 40
Applicant Income Distribution by Race/Ethnicity in Salt Lake County Cities, 2006-2011



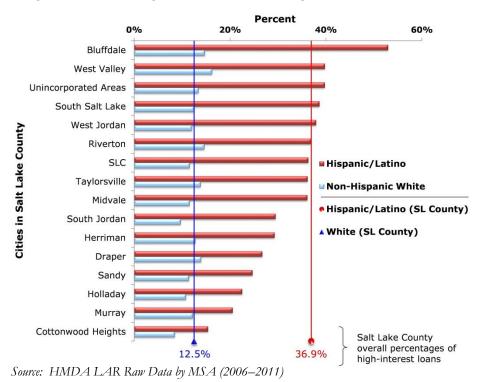
(MFI), only 14 percent of Hispanic applicants reported incomes in this bracket. Thus, the self-selection effect is particularly striking in Salt Lake City, where Hispanics mostly apply for the more affordable housing on the west-side River District neighborhoods, while white applicants predominantly selected east-side properties. Please see the fair housing equity assessment on Salt Lake City for more analysis on the self-selection effect.

With Salt Lake City as an exception, the income distributions between the two groups are in fact more similar within cities than across cities. For instance, both groups had roughly 14 percent of West Valley City applicants with reported incomes at or below 50 percent MFI. On the other hand, in southern cities such as Draper, Herriman, and Riverton, the share of applicants above the median family income is near or above 70 percent for both groups. Thus, more affluent applicants, regardless of race, have a tendency to apply for properties in the southern part of the county, whereas low-er-income applicants tend to select West Valley City, West Jordan, Taylorsville, and South Salt Lake. With the exception of Salt Lake City, the self-selection effect is more prominent across cities in the county rather than within cities.

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

For the purposes of this study, high-interest loans are defined as any loan with a reported rate spread that exceeds 3 percent for first liens and 5 percent for subordinate liens. This is the threshold that lenders have been required to disclose since 2004. The rate spread is the difference between the loan APR and the yield of comparable Treasury securities. The Federal Reserve Board selected threshold with the intent that the rate spread for most subprime loans would be reported and that most prime loans would not require this disclosure<sup>1</sup>. Thus, the

Figure 41
Percent of High-Interest Loans among Approved Applicants by Race/Ethnicity in Salt Lake County Cities, 2006–2011



<sup>&</sup>lt;sup>1</sup> Avery, Robert B., Kenneth P. Brevoort and Glenn B. Canner. "Opportunities and Issues in Using HMDA Data." *Journal of Real Estate Research* 29.4 (2007).

BLUFFDALE: FAIR HOUSING EQUITY ASSESSMENT

rate spread disclosure can serve as a proxy for subprime lending.

This disproportionately high share of high-interest loans among Hispanic applicants could be a precursor to foreclosures and thus increased housing instability. Thus, even for Hispanics with approved mortgage loans, their disproportionately high rate of high-interest loans still reflects an ununderlying housing impediment that could have repercussions in long-term housing stability.

The disproportionately high prevalence of high-interest loans among Hispanic applicants is apparent across all cities in Salt Lake County. Figure 41 shows the percent of high-interest loans among non-Hispanic white and Hispanic/Latino applicants during the 2006–2011 period. At the county level, nearly 37 percent of Hispanic approved loans are considered high interest—nearly triple the rate among non-Hispanic white applicants. Over half of Bluffdale's approved applications among Hispanics/Latinos are considered high-interest loans. While this represents the highest rate of high-interest loans in the county, Bluffdale only had 30 Hispanic/Latino applicants during this 6-year period. The percentage of high-interest loans for Hispanic applicants selecting South Jordan, Herriman, Draper, Sandy, Holladay, Murray, and Cottonwood Heights are significantly lower than the county-level average. Nonetheless, the high-interest loan gap between the two groups still range from 7 to nearly 20 percentage points for these cities.

Housing instability has implications in a larger context of infrastructural opportunity. Furthermore, the disparities in mortgage outcomes could lead to broader economic repercussions associated with the gap of homeownership rates across race/ethnicity. Hispanic families, faced with higher-interest loans and potentially higher rates of foreclosure, could be forced to move frequently, resulting in elevated school mobility rates for their children. In turn, housing instability could result in lower educational opportunities and diminished household wealth. Furthermore, high turnover in neighborhoods can negatively affect housing desirability and home values in the area. The county should examine housing and mortgage data in a broader context of opportunity.