



2019 Analysis of Impediments to Fair Housing Choice

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City of St. George
Community Development
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Executive Summary

The following Analysis of Impediments to Fair Housing Choice (AI) serves as a comprehensive look at fair housing issues in the City of St. George. The report includes an analysis of various demographic, economic, and housing indicators, a review of public and private sector policies that affect fair housing, and a review of the city's efforts to affirmatively further fair housing (AFFH) per federal law. This report is set up in three main sections: 1) Community Profile; 2) Public Sector Analysis; and 3) Fair Housing. A final section identifies the impediments to fair housing choice in the city and recommends actions that can be taken to address each of these impediments.

Located in southwestern Utah, St. George is the major transportation hub in the area, while also being a travel destination for many visitors each year. The city comprises a total area of 65 square miles and had a population of 78,573 in 2016, a growth of 58.2 percent since 2000 – making it one of the fastest growing metro areas in the country.

With the rising pressure to create affordable housing in St. George, the city faces barriers and impediments such as discrimination in the effort to realize fair housing for all residents seeking homes. To ensure that all residents in the city are protected under state and local law, and to adhere with the Department of Housing and Urban Development (HUD) regulations on fair housing as required by HUD entitlement grants, the City of St. George has taken steps to promote fair housing and to educate its leadership, staff, and residents on what HUD defines as fair housing and discrimination in housing. Further, the City has identified what steps it must take to overcome the barriers identified and what the consequences are for those who do not adhere to a policy of fair housing and non-discrimination.

This report provides an analysis of the most recent data available from the Home Mortgage Disclosure Act (HMDA) database. HMDA data provides insight into the mortgage lending practices and trends throughout St. George. In 2017, there were approximately 9,000 applications for single-family home purchase, refinance or home improvements that were submitted with nearly 5,000 of those applications resulting in a loan origination – a 55 percent approval rate. Just over 700 mortgage applications were neither denied nor originated (most commonly these applications were withdrawn, closed before processing, or approved but not accepted), leaving an 8 percent overall denial rate. Throughout the city, Hispanic applicants had a higher denial rate than White applicants; 8 percent of Hispanic applicants were denied for conventional single-family home purchases, while 5 percent of White applicants were denied for the same type of loan. The leading cause of loan application denial was high debt-to-income ratios.

The conclusion of this analysis has identified several current impediments to fair housing choice. For each impediment, recommendations and outcome measures have been identified for activities that can help to alleviate these impediments moving forward. The current impediments to fair housing choice are:

- Impediment 1: There is a lack of fair housing programs in St. George
- Impediment 2: Limited affordable housing in St. George
- Impediment 3: Lack of state or local fair housing laws
- Impediment 4: Lack of Public Resources in Spanish

Methodology

The Analysis consists of a comprehensive review of laws, regulations, policies and practices affecting housing affordability, accessibility, availability and choice within the City of St. George. The assessment specifically includes an evaluation of:

- Existing socio-economic conditions and trends in the city, with a particular focus on those that affect housing and special needs populations;
- Public and private organizations that impact housing issues in the city and their practices, policies, regulations and insights relative to fair housing choice;
- The range of impediments to fair housing choice that exists within both the urban center communities and other areas of the city;
- Specific recommendations and activities for the city to address any real or perceived impediments that exist; and
- Effective measurement tools and reporting mechanisms to assess progress in meeting fair housing goals and eliminating barriers to fair housing choice in the city.

The planning process was launched with a comprehensive review of existing studies for information and data relevant to housing need and related issues. These documents included local comprehensive plans and ordinances, the Housing and Community Development Consolidated Plan for St. George, the previous Analysis of Impediments to Fair Housing Choice, and other policy documents. Stakeholder input and observations were incorporated as well.

Additional quantitative data were obtained from sources including U.S. Census Bureau reports, American Community Survey data (ACS), the Utah Foundation, the US Bureau of Labor Statistics (BLS), Boxwood Means Inc. via PolicyMap, Federal Financial Institutions Examination Council

(FFIEC) and the Utah Antidiscrimination and Labor Division (UALD).

Purpose of Fair Housing

Fair housing has long been an important issue in American urban policy – a problem born in discrimination and fueled by growing civil unrest that reached a boiling point in the Civil Rights Movement. The passing of the Fair Housing Act in 1968 was a critical step towards addressing this complex problem, but it was far from a permanent solution. Since the passing of the Act, community groups, private businesses, concerned citizens, and government agencies at all levels have worked diligently to battle housing discrimination. The Fair Housing Act mandates that HUD ‘affirmatively further fair housing’ through its programs. Towards this end, HUD requires funding recipients to undertake fair housing planning (FHP) in order to proactively take steps that will lead to less discriminatory housing markets and better living conditions for minority groups and vulnerable populations.

As part of the HUD-mandated Consolidated Planning process, the City of St. George adopted its Five Year Consolidated Plan in 2014. The Five Year Consolidated Plan is an assessment of the economic and social state of the city, as well as local government policies and programs aimed at improving the living environment of its low- and moderate-income residents. The Strategic Plan includes a vision for the region that encompasses the national objectives of the Community Development Block Grant (CDBG) program and is accompanied by a first year Action Plan that outlines short-term activities to address identified community needs. As part of the planning process, St. George must also affirmatively further Fair Housing and undertake Fair Housing planning. This process includes the preparation of an Analysis of Impediments to Fair Housing Choice.

This 2019 Analysis of Impediments to Fair Housing Choice is an in-depth examination of potential barriers, challenges and opportunities for housing choice for St. George residents on a citywide scale. Impediments to Fair Housing are defined as any actions, omissions, or decisions based upon race, color, religion, national origin, disability, gender, or familial status that restrict, or have the effect of restricting, housing choice or the availability of housing choice. Fair Housing Choice is the ability of persons of similar income levels – regardless of race, color, religion, national origin, disability, gender, or familial status – to have the same housing choices.

The Analysis of Impediments is an integral component of the fair housing planning process and consists of a review of both public and private barriers to housing choice. It involves a comprehensive inventory and assessment of the conditions, practices, laws, and policies that impact housing choice within a jurisdiction. It provides documentation of existing, perceived and

potential fair housing concerns, and specific action strategies designed to mitigate or eliminate obstacles to housing choice for the residents. The Analysis is intended to serve as a strategic planning and policy development resource for local decision makers, staff, service providers, the private sector, and community leaders in the city. As such, this Analysis of Impediments will ultimately serve as the foundation for fair housing planning in the region.

The long-term objective of this Analysis of Impediments to Fair Housing Choice is to make fair housing choice a reality for residents of St. George through the prevention of discriminatory housing practices. One goal of the study is to analyze the fair housing situation in the city and assess the degree to which fair housing choice is available for area residents. A second goal is to suggest ways to improve the level of choice through continued elimination of discriminatory practices, if any are found to exist. The sections that follow provide a succinct overview of the legal and conceptual aspects of fair housing planning and policy.

Fair Housing Concepts

Housing choice plays a critical role in influencing individuals' and families' abilities to realize and attain personal, educational, employment and income potential. The fundamental goal of HUD fair housing policy is to make housing choice a reality through sound planning. Through its ongoing focus on Fair Housing Planning, HUD "is committed to eliminating racial and ethnic discrimination, illegal physical and other barriers to persons with disabilities, and other discriminatory practices in housing." Among the recurring key concepts inherent in fair housing planning are:

- *Affirmatively Further Fair Housing (AFFH)* – Under its community development programs, HUD requires its grantees to affirmatively further fair housing through three broad activities: 1) conduct an *Analysis of Impediments to Fair Housing Choice*; 2) act to overcome identified impediments; and 3) track measurable progress in addressing impediments and the realization of fair housing choice.
- *Affordable Housing* – Decent, safe, quality housing that costs no more than 30% of a household's gross monthly income for utility and rent or mortgage payments.
- *Fair Housing Choice* – The ability of persons, regardless of race, color, religion, national origin, disability, gender, or familial status, of similar income levels to have the same housing choices.
- *Fair Housing Planning (FHP)* – Fair Housing Planning consists of three components: the *Analysis of Impediments*, a detailed *Action Plan* to address identified impediments, and a monitoring process to assess progress in meeting community objectives. FHP consists of a close examination of factors that can potentially restrict or inhibit housing choice and

serves as a catalyst for actions to mitigate identified problem areas.

- *Impediments to Fair Housing* – Any actions, omissions, or decisions based upon race, color, religion, national origin, disability, gender, or familial status that restrict, or have the effect of restricting, housing choice or the availability of housing choice.
- *Low and Moderate Income* – Defined as 80% of the median household income for the area, subject to adjustments for areas with unusually high or low incomes or housing costs. *Very low-income* is defined as 50% of the median household income for the area, subject to adjustments for areas with unusually high or low incomes or housing costs. Poverty level income is defined as 30% or below median household income.
- *Private Sector* – Private sector involvement in the housing market includes banking and lending institutions, insurance providers, real estate and property management agencies, property owners, and developers.
- *Public Sector* – The public sector for the purpose of this analysis includes local and state governments, regional agencies, public housing authorities, public transportation, community development organizations, workforce training providers, and community and social services.

Community Profile

The goal of the community profile is to paint a picture of the current demographic, economic, and housing framework of the City of St. George in order to aid decision makers in affirmatively furthering fair housing. The Community Profile is broken into two key sections: (1) the Demographic and Economic Profile, and (2) the Housing Profile. The Demographic and Economic profile looks at the city from the perspective of its people, exploring variables such as race and ethnicity, age, disability status, income, employment, and poverty. The Housing Profile looks at the area's housing stock from various angles such as home values, rents, housing cost burden, vacancy, and substandard housing to provide a snapshot of the physical environment of St. George. Together, these pieces provide a data-driven view of the city that will empirically advance fair housing planning efforts.



Demographic and Economic Profile

Population

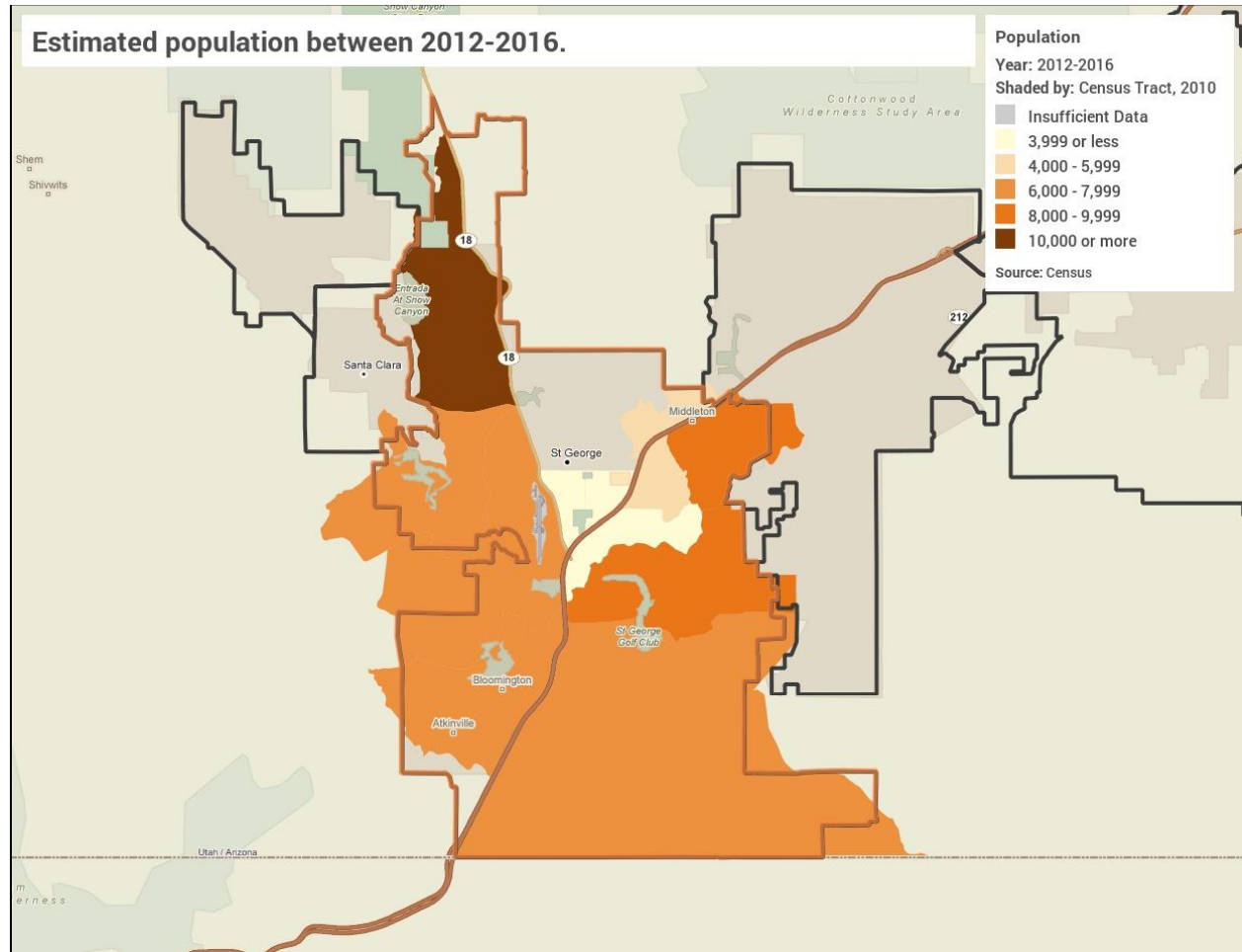
The most current population of the City of St. George is 78,573, according to 2012-2016 American Community Survey 5-Year Estimates. This represents a 58.2% growth since 2000 – almost twice that of the state. The state growth rate for the same period was 32%. The data table below details population change in the city and the State of Utah between 2000 and 2016.

TABLE: Population - 2000 to 2016			
City/State	2000	2016	% Change 2000-2016
St. George	49,663	78,573	58.2%
Utah (state)	2,233,169	2,948,427	32.0%
Source: 2000 Census DP-1, 2012-2016 American Community Survey 5-Year Estimates (DP05)			

Population change is one of the most pertinent issues St. George will face in the next few years. In a recent report by the United States Census Bureau, the St. George metro area, of which St. George is the principle city, was ranked the fastest growing metro area in the country by percentage rate from July 1, 2016 to July 1, 2017. The Utah Foundation estimates that St. George's population will continue to grow rapidly from 72,897 in 2010 to 249,421 by 2050 – a substantial increase of 242%. (Source: Utah Foundation 2014, *A Snapshot of 2050*)

The following map geographically displays the distribution of the population throughout the city. Lighter colored shades represent areas with lower populations and darker shades represent areas with higher populations.

MAP: Population



Source: 2012-2016 ACS via PolicyMap

According to the map above, the largest concentrations of population are in the northwest tip and northeast areas of the city. This fact is not surprising as these are the primary residential areas of St. George.

Age

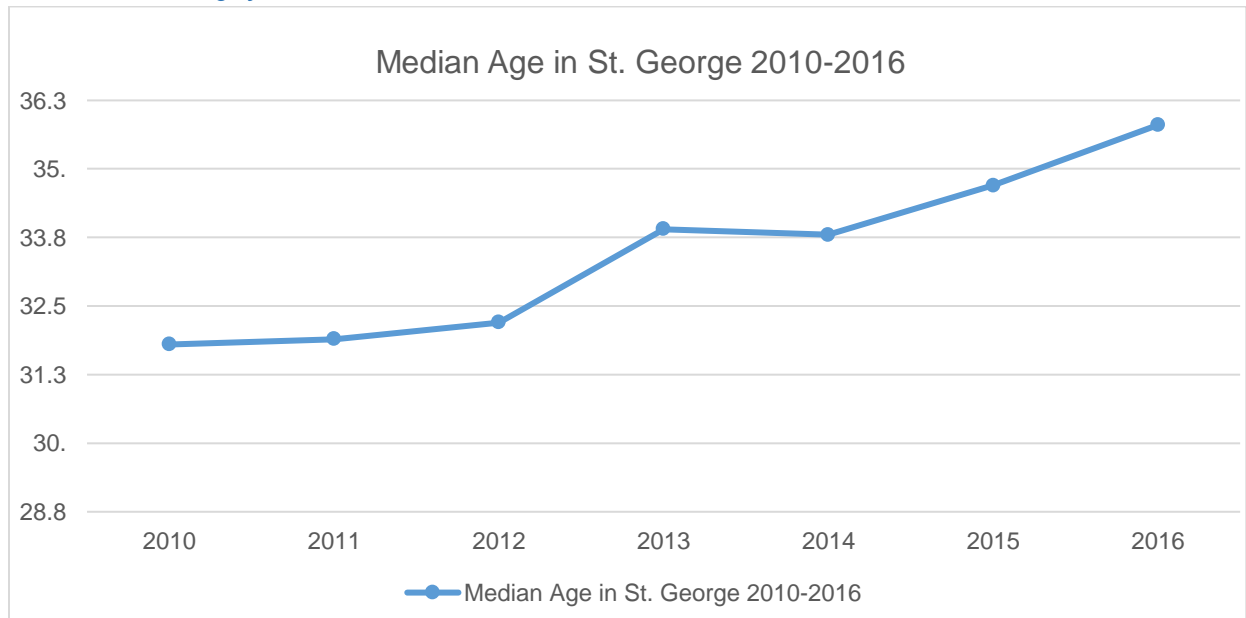
Like much of the country, demographic data from the city indicates that the age of the population is growing. In 2016, elderly 65 years and older were 20.9% of the total population in St. George. That represents an increase of 1.6% from 2000, when people aged 65 and older also made up 19.3% of the total population. In addition to the percentage growth in elderly residents, the population of elderly in the city grew from 9,566 in 2000 to 16,465 in 2016. In 2016, the largest age cohort in the city was 25 to 34 years with 12% of the total population (9,446 persons).

TABLE: Age Distribution

Age Cohort	Number of People in Age Group	Percent of People in Age Group
	St. George	
Under 5 years	5,757	7.3%
5 to 9 years	6,071	7.7%
10 to 14 years	5,671	7.2%
15 to 19 years	5,562	7.1%
20 to 24 years	6,143	7.8%
25 to 34 years	9,446	12.0%
35 to 44 years	7,939	10.1%
45 to 54 years	7,154	9.1%
55 to 59 years	3,839	4.9%
60 to 64 years	4,526	5.8%
65 to 74 years	8,361	10.6%
75 to 84 years	5,692	7.2%
85 years and over	2,412	3.1%
Median Age	35.8	N/A
Source: 2012-2016 American Community Survey 5-Year Estimates (DP05)		

The median age in St. George has been rising. St. George's median age is 3.9 years older than the statewide median. In 2016, the median age in Utah was 30.3 years according to American Community Survey 5-Year Estimates. This represents a 11.8% increase in the median age since the 2000 Census when the median age was 27.1 years of age. In comparison, over the same period the citywide median age in St. George increased 12.8%, from 31.2 to 35.8 years.

CHART: Median Age from 2010-2016



Source: 2006-2010 to 2012-2016 American Community Survey 5-Year Estimates (S0101)

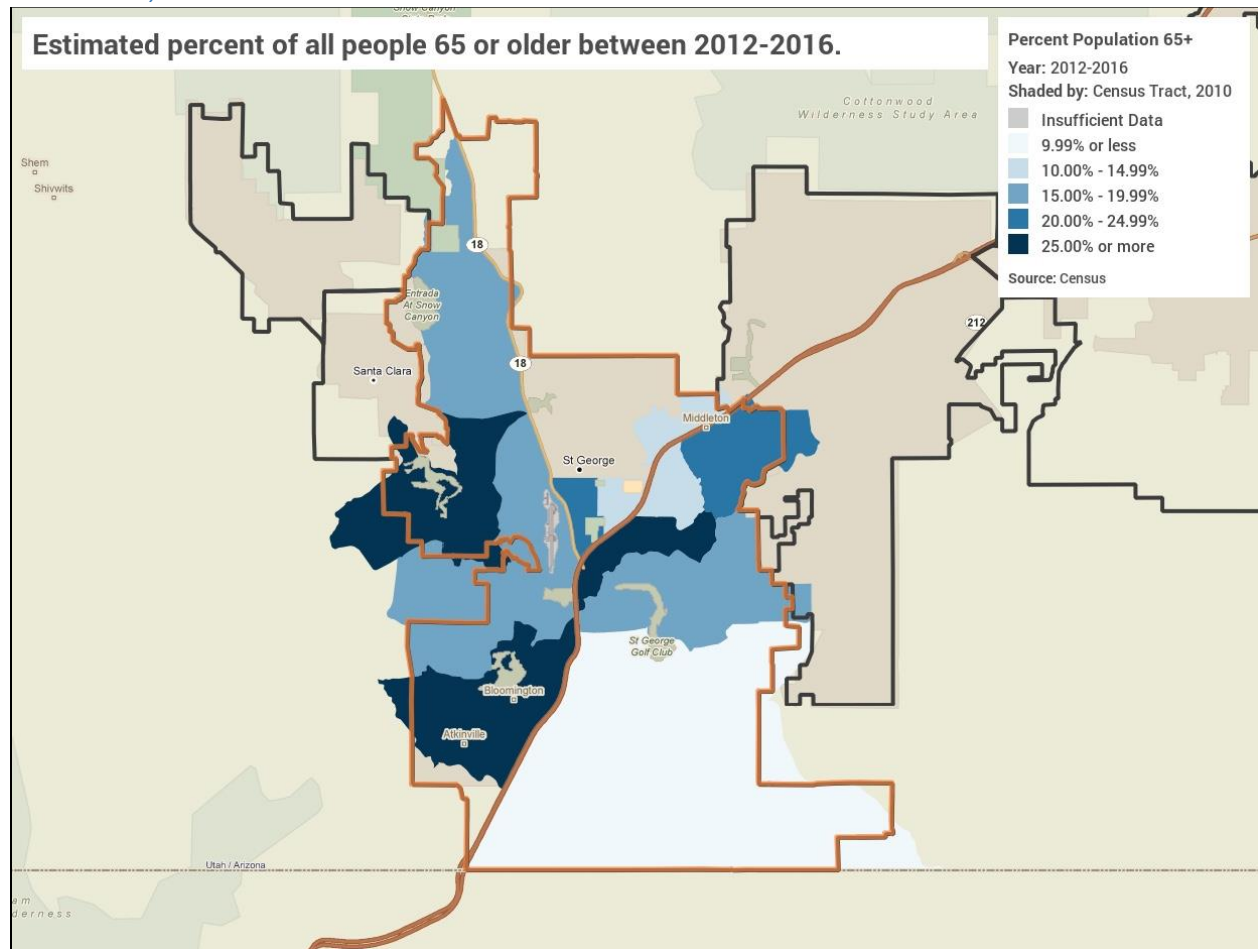
Elderly

Where housing is concerned, the needs of people aged 65 and over are particularly important. As people age they may require new types of social services, healthcare, and housing. As communities across the nation grow proportionately older, the needs of the elderly become an increasingly important aspect of both public and private decision-making. Central to these evolving needs is access to housing options that are decent, safe, affordable, accessible, and located in proximity to services and transportation. Housing is one of the most essential needs of the elderly because the affordability, location, and accessibility of where they live will directly impact their ability to access health and social services – both in terms of financial cost and physical practicality. With a population aging in St. George (11.8%) at similar rate compared to the state as a whole (12.8%), housing issues among the elderly will become increasingly salient to St. George policy makers in the years to come.

People aged 65 and over comprise a higher percentage of St. George's population than that of Utah as a whole. Approximately 20.9 percent of the city's population was over the age of 65 (16,465 persons) - compared to the state at 10 percent (2012-2016 ACS). Furthermore, 3.1 percent of the city's population was aged 85 years and over (2,412 persons) – compared to just 1.1 percent in the state as a whole.

The following two maps highlight the geographic distribution of the elderly population throughout the city. The first map details the distribution of those aged 65 and older; the second map details the distribution of those aged 85 and older. Lighter colored shades represent areas with lower populations and darker shades represent areas with higher populations.

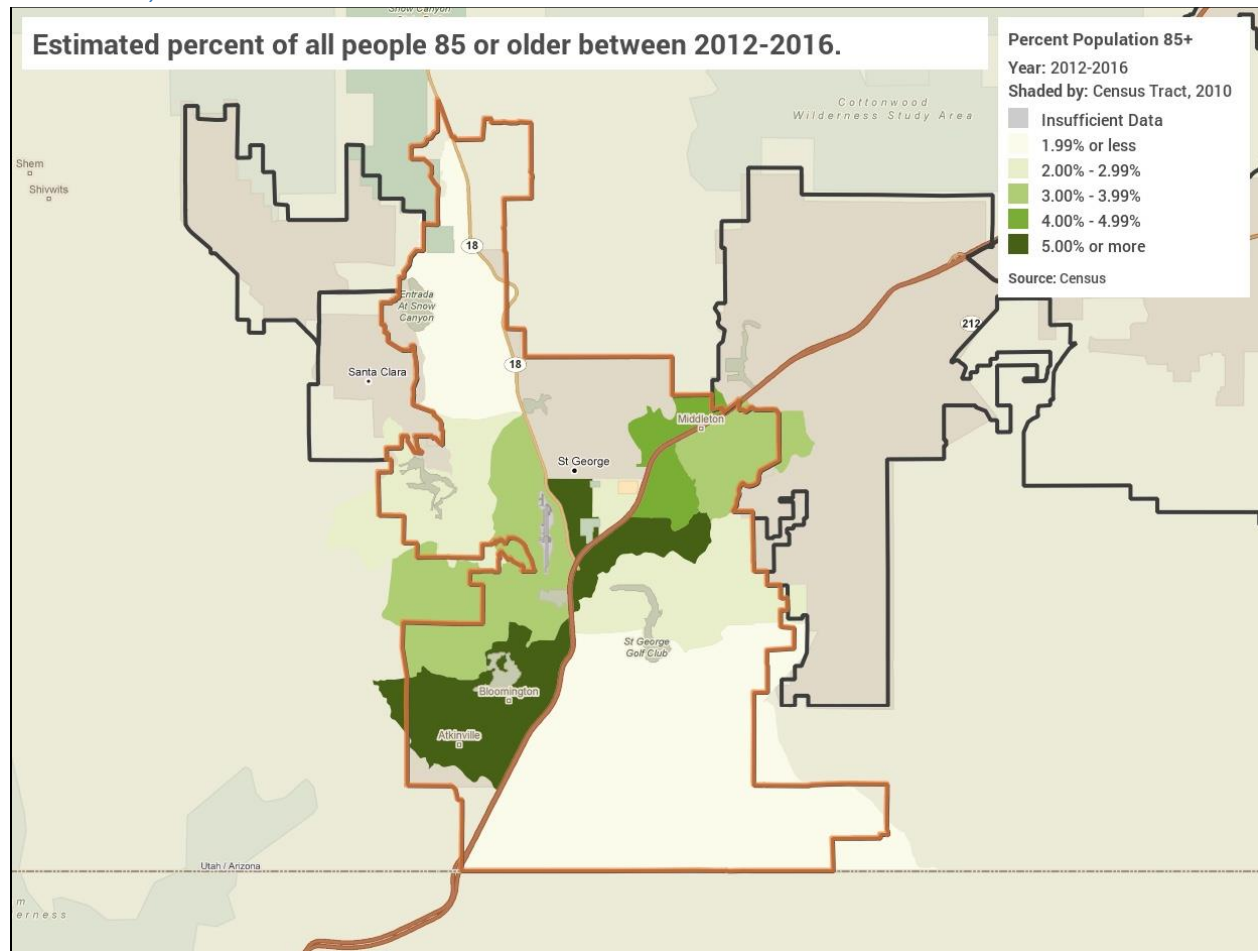
MAP: Elderly - 65 and Older



Source: 2012-2016 ACS via PolicyMap

There are three areas in the city where elderly make up 20% or more of the population – almost one in five persons. These areas are found along I-15 and in the northwest part of the City up and down along Dixie Dr. and Valley View Dr.

MAP: Elderly - 85 and Older



Source: 2012-2016 ACS via PolicyMap

Age Dependency Ratios

Age dependency ratios relate the number of working-aged persons to the number of dependent-aged persons (children and the elderly). An area's dependency ratio is comprised of two smaller ratios – the child dependency ratio and the old-age dependency ratio. These indicators provide insight into the social and economic impacts of shifts in the age structure of a population. Higher ratios of children and the elderly require higher levels of services to meet the specific needs of those populations. Furthermore, a higher degree of burden is placed on an economy when those who mainly consume goods and services become disproportionate to those who produce. It is important to note that these measures are not entirely precise – not everyone under the age of 18 or over 65 is economically dependent, and not all working age individuals are economically productive. With these caveats in mind, dependency ratios are still helpful indicators in gauging the directional impacts of shifting age structures.

TABLE: Age Dependency Ratio

City/State	Old-age Dependency Ratio	Child Dependency Ratio	Age Dependency Ratio
St. George	39.9	50.4	90.3
Utah (state)	16.9	51.8	68.7
Source: 2012-2016 American Community Survey 5-Year Estimates (S0101)			

Given the shifting demographics discussed in the previous sections, the age dependency ratios across the city will continue to rise in St. George. A 2010 US Census report on aging trends in the United States provides insight into the extent of the coming shift in the United States: “By 2030, all of the baby boomers will have moved into the ranks of the older population. This will result in a shift in the age structure, from 13 percent of the population aged 65 and older in 2010 to 19 percent in 2030.” As this shift occurs, the working age population will simultaneously be shrinking. Sixty percent of the nation's population was aged 20-64 in 2010. The Census estimates that by “2030, as the baby boomers age, the proportion in these working ages will drop to 55 percent.”¹

¹ US Census Bureau, *The Next Four Decades: The Older Population in the United States: 2010 to 2050*. Retrieved from: <https://www.census.gov/prod/2010pubs/p25-1138.pdf>

Being mindful of these changes in old-age dependency ratios is especially important for communities with a growing elderly population. In addition to the percentage of persons aged 65 and older growing slightly from 2000 to 2016, the population of elderly in the city grew from 9,566 in 2000 to 16,465 in 2016 (St. George's population grew 58.2% in this time period). A shrinking working age population means fewer workers producing goods and services, and consequently generating less tax revenue. An aging population also increases demand for social services, healthcare, and housing for the elderly. The intersection of these two trends presents a unique challenge for communities such as St. George in the coming years.

Race and Ethnicity

According to the 2012-2016 ACS 5-Year Estimates, Whites comprised 89.4% of the population, American Indians and Alaska Natives comprised 1.2%, and all other races made up 9.4% in the city. Approximately 13% of the population identify as ethnically Hispanic (persons can identify as both ethnically Hispanic and racially as another group). The table below provides a detailed breakdown of the racial and ethnic composition of the city as compared to the state as a whole.

TABLE: Racial and Ethnic Composition				
Race	St. George	Percentage	Utah (state)	Percentage
White	70,228	89.4%	2,572,595	87.3%
Black or African American	716	0.9%	32,512	1.1%
American Indian and Alaska Native	919	1.2%	31,686	1.1%
Asian	490	0.6%	66,039	2.2%
Native Hawaiian / Other Pacific Islander	821	1.0%	26,411	0.9%
Some other race	3,373	4.3%	141,374	4.8%
Two or more races	2,026	2.6%	77,810	2.6%
Hispanic or Latino (of any race)	10,301	13.1%	397,915	13.5%
Source: 2012-2016 American Community Survey 5-Year Estimates (DP05)				

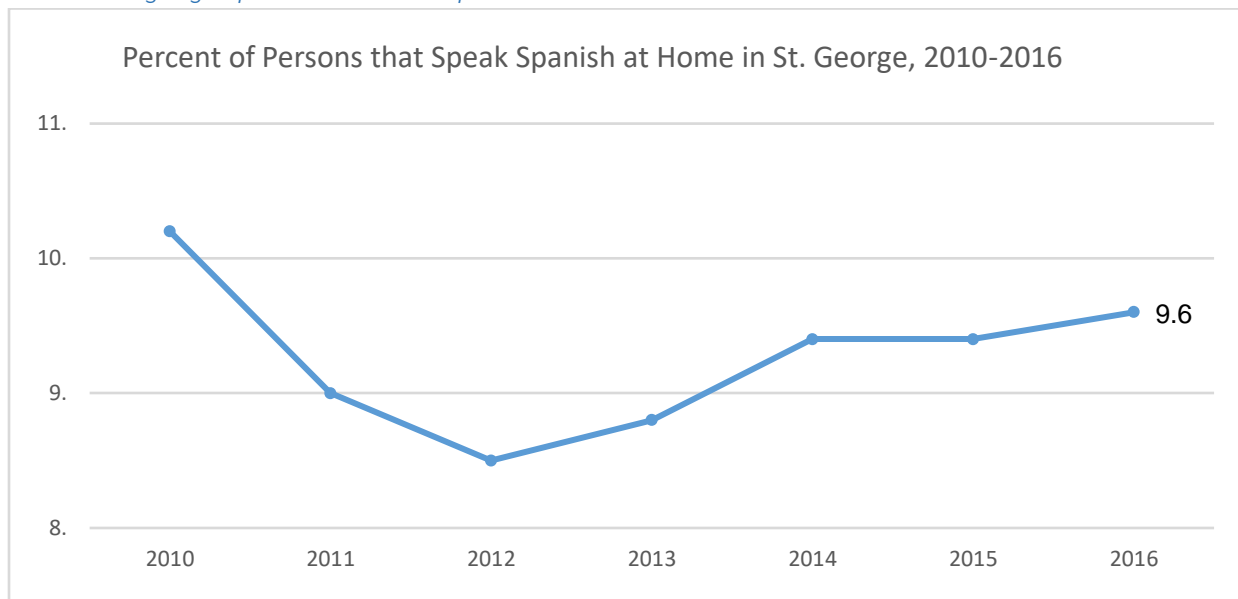
While the percentages of all races have remained relatively constant since 2000, the composition of St. George's ethnicity is changing. In 2000, 6.7 percent of the population in St. George identified ethnically as Hispanic or Latino. By 2016, that figure almost doubled (13.1%). In an analysis of the projected population change in the state, the Utah Foundation reports, "Utah's current racial demographics are similar to the nation as a whole in the 1950s – four-fifths of the population is white with a much smaller proportion of other races. Although racial diversity is shifting slowly toward the national average, Utah's ethnic diversity is changing more rapidly."²

With the number of individuals who identify as ethnically Hispanic rising in St. George, the needs of the community will also shift accordingly, particularly in the areas of communication and

² Utah Foundation (2014), *A Snapshot of 2050*

language. While English is the primary language in St. George, as is common across the country, there are many people who still speak another language at home. In the case of the Hispanic population, Spanish is the primary language spoken. According to the 2012-2016 ACS, over one-third of those who speak Spanish do not speak English very well (37.4%). Below is a chart showing the change in the number of individuals in the city who speak Spanish at home.

CHART: Language Spoken at Home – Spanish



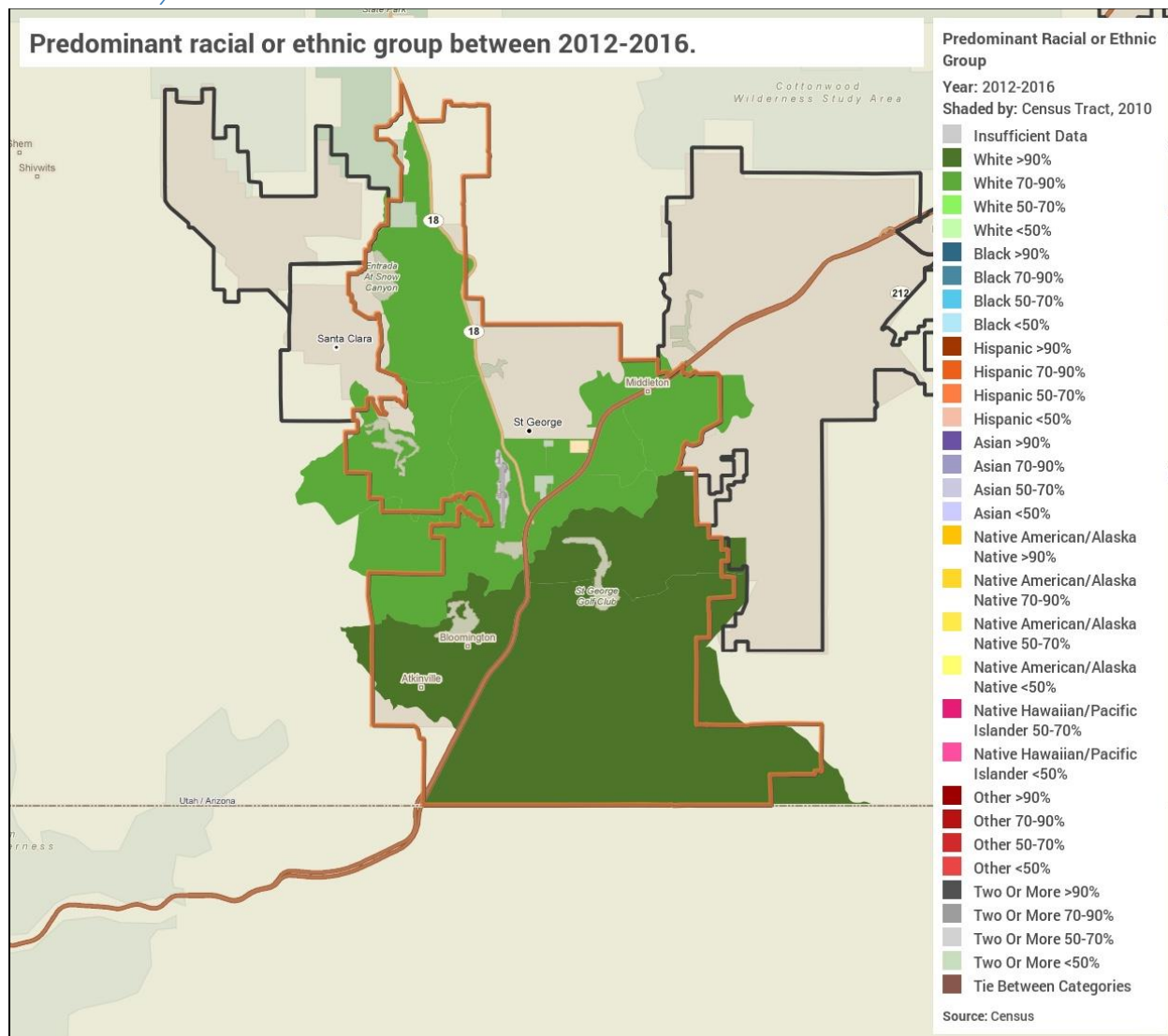
Data Source: 2006-2010 ACS – 2012-2016 ACS (S1601)

From 2010 to 2012, St. George saw a decline in the percent of people who spoke Spanish at home, however since then it has been steadily rising. With the rate of individuals who identify as Hispanic expected to continue rising, it is also anticipated that the use of Spanish in the city will increase.

Diversity

The diversity map below provides a visual representation of the predominant race within St. George. The city is predominantly White (89.4%) and there is a higher concentration of White residents in the southern census tracts. Although race is just one factor affecting fair housing choice, it is a useful tool in understanding the demographics of individual tracts across the city.

MAP: Diversity – Predominant Race

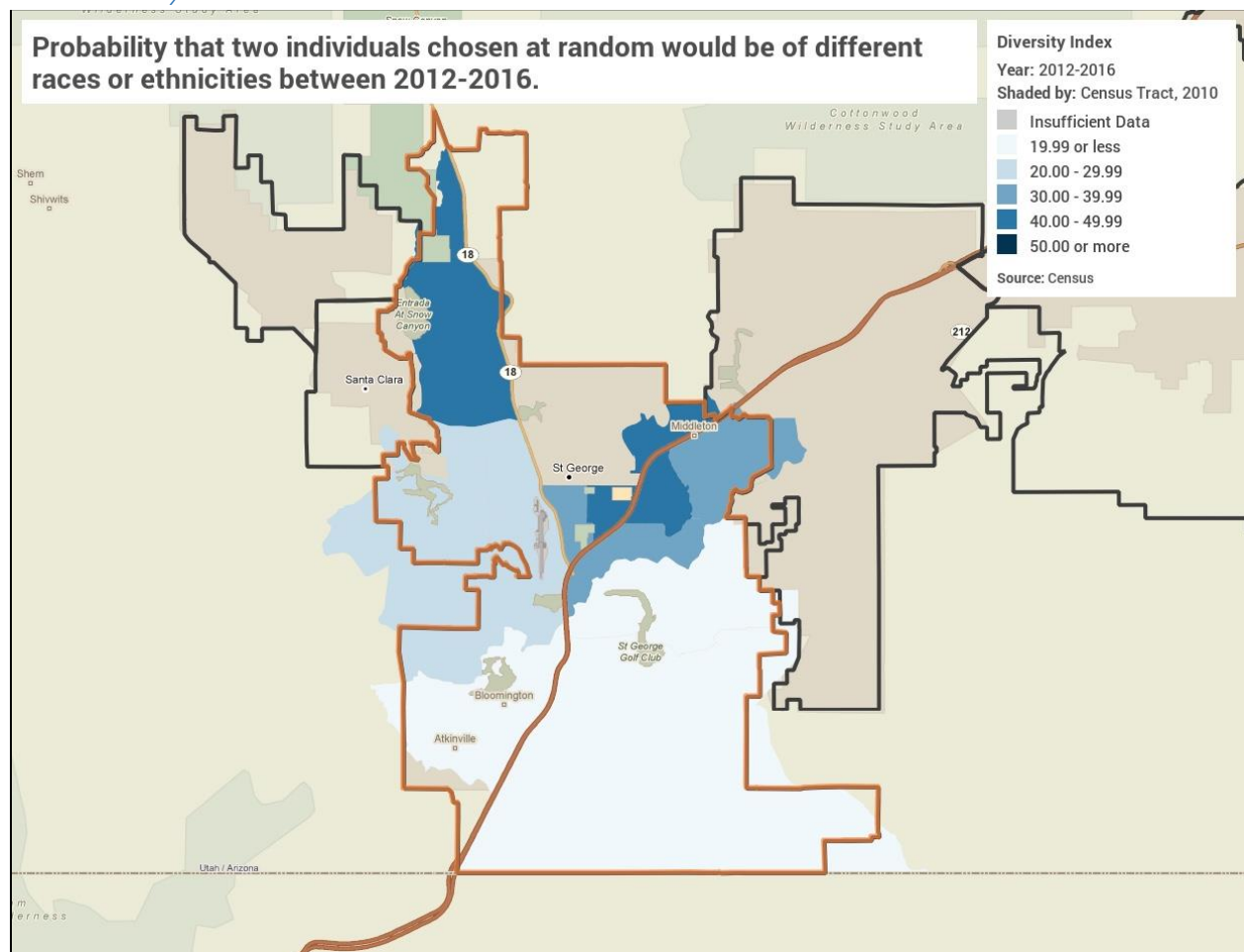


Source: 2012-2016 ACS via PolicyMap

The map below displays the Diversity Index ranking for census tracts in St. George, based on data from Policy Map. As Policy Map explains: “The diversity index is an index ranging from 0 to 87.5 that represents the probability that two individuals, chosen at random in the given geography,

would be of different races or ethnicities between 2012-2016. Lower index values between 0 and 20 suggest more homogeneity (similar) and higher index values above 50 suggest more heterogeneity (diverse). Racial and ethnic diversity can be indicative of economic and behavioral patterns. For example, racially and ethnically homogenous areas are sometimes representative of concentrated poverty or concentrated wealth. They could also be indicative of discriminatory housing policies or other related barriers.” While St. George is 89.4% White, the diversity index ranges across the city. The index score is higher in the northern areas of the city (more diverse) than the southern areas of the city (less diverse).

MAP: Diversity Index



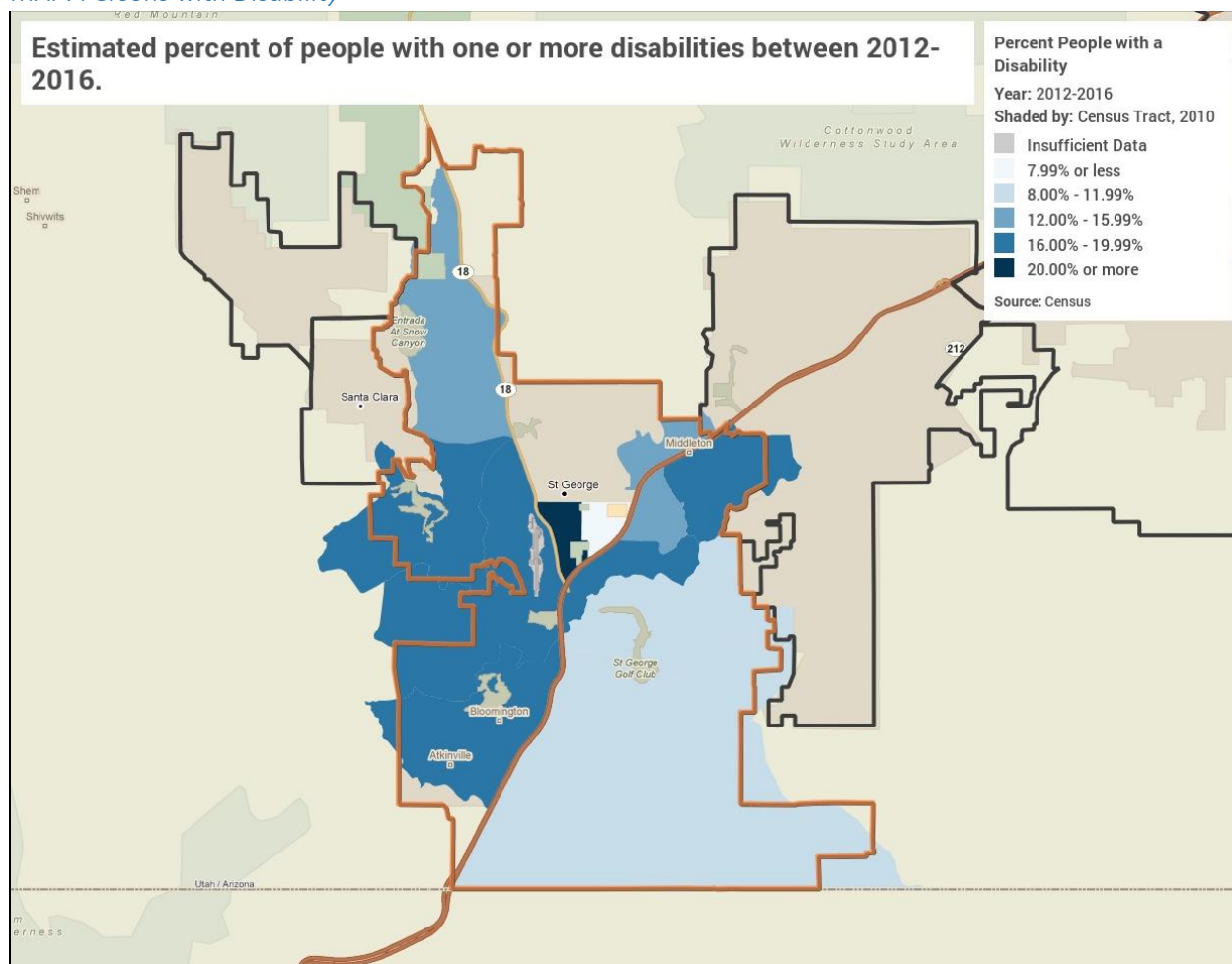
Source: 2012-2016 ACS via PolicyMap

Disability

In addition to having to overcome barriers such as housing discrimination and difficulty in finding accessible units, people with disabilities face financial hardships at much higher rates than the average person. An estimated 14.3 percent of the total population of St. George (11,165 people) had a disability of some sort, and only 29.3 percent of those in the labor force are employed. Unfortunately, accessible and affordable housing remains firmly out of reach for a large portion of the disabled population.

The map below shows the distribution of people with a disability in St. George. Like many of the variables studied in this analysis, the concentration of people with a disability is disproportionate across the city. Over 20 percent of the population in one census tract are disabled.

MAP: Persons with Disability



Source: 2012-2016 ACS via PolicyMap

The following tables provide data on the number of people with a disability in St. George, broken down by age and compared to the state. In St. George, only one age cohort has a lower disability rate in the city than in the state (5-17 years old). As is typical across the state and the country, the elderly experience a higher rate of disability across the board in comparison to other age cohorts.

TABLE: Disability and Age				
	St. George	Percent of population in age group w/ a disability	Utah (state)	Percent of population in age group w/ a disability
Persons with a disability	11,165	14.3%	279,406	9.6%
Under 5 years	175	3.0%	1,812	0.7%
5 to 17 years	430	2.9%	28,210	4.4%
18 to 34 years	1,182	6.6%	43,179	5.6%
35 to 64 years	3,041	13.0%	104,410	10.9%
65 to 74 years	2,287	27.7%	41,929	24.5%
75 years and over	4,050	50.8%	59,866	49.7%
Source: 2012-2016 American Community Survey 5-Year Estimates (S1810)				

The following table provides data on the extent of disabilities among different racial and ethnic groups for both the city and the state as a whole. With the exceptions of American Indians and Alaska Natives, Native Hawaiian/Other Pacific Islanders and residents who identify as “some other race”, all of the city’s minorities experience disabilities at rates higher than the statewide rates for their race or ethnicity.

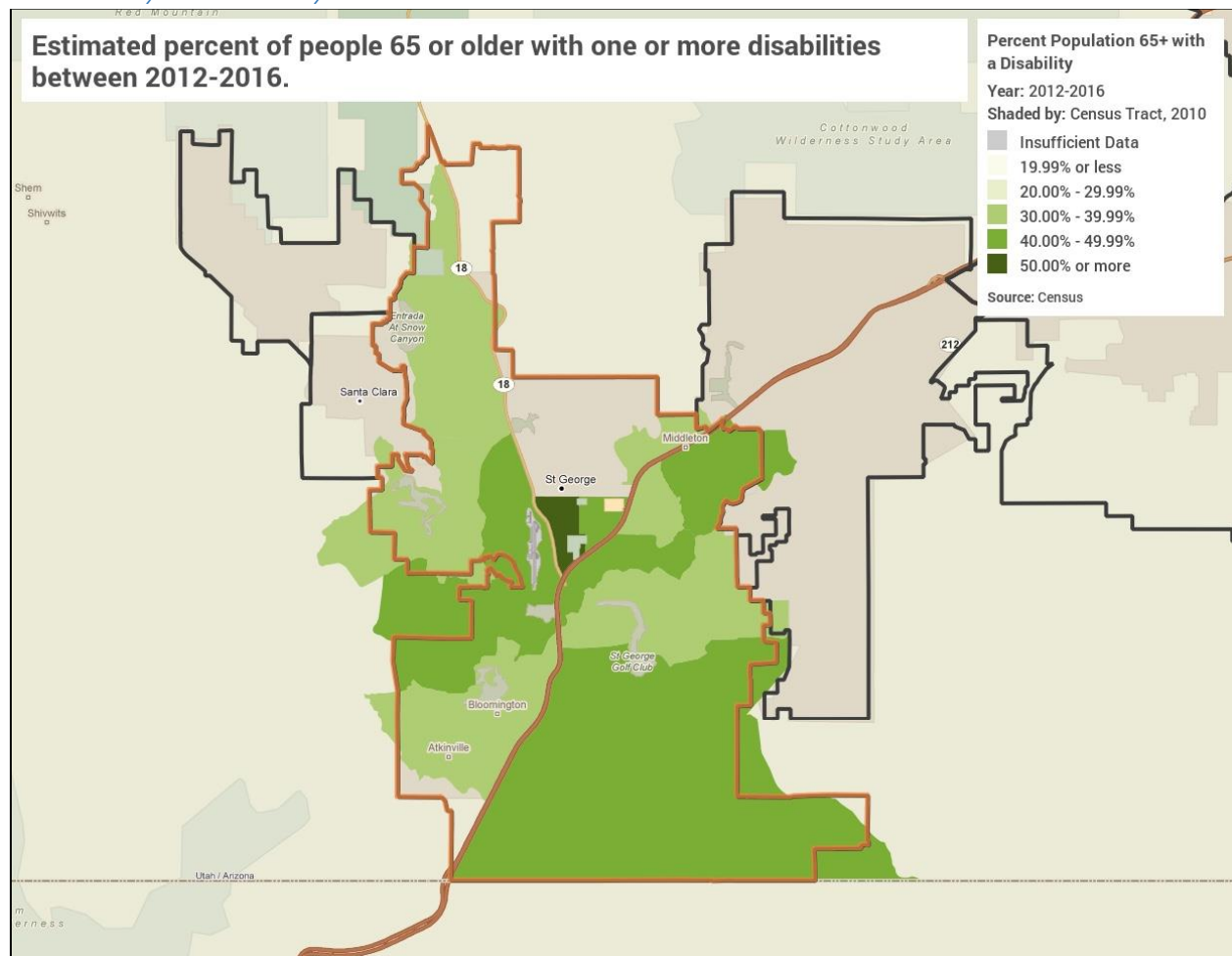
TABLE: Disability and Race

Race	St. George	Percent of race/ethnic group w/ a disability	Utah (state)	Percent of race/ethnic group w/ a disability
White	10,598	15.2%	253,095	9.9%
Black or African American	72	10.4%	2,991	9.5%
American Indian and Alaska Native	74	8.4%	3,868	12.5%
Asian	69	14.1%	3,779	5.7%
Native Hawaiian and Other Pacific Islander	24	2.9%	1,633	6.2%
Some other race	136	4.0%	7,208	5.2%
Two or more races	192	9.6%	6,832	8.9%
Hispanic or Latino (of any race)	759	7.4%	25,760	6.5%
Source: 2012-2016 American Community Survey 5-Year Estimates (S1810)				

For many people, the struggle to find affordable housing is compounded by the need for housing that can accommodate a disability – particular for the elderly, the unemployed, and people living in poverty.

The following series of maps highlights the geographical distribution of the disabled population across differing variables. Lighter colored shades represent areas with lower populations and darker shades represent areas with higher populations.

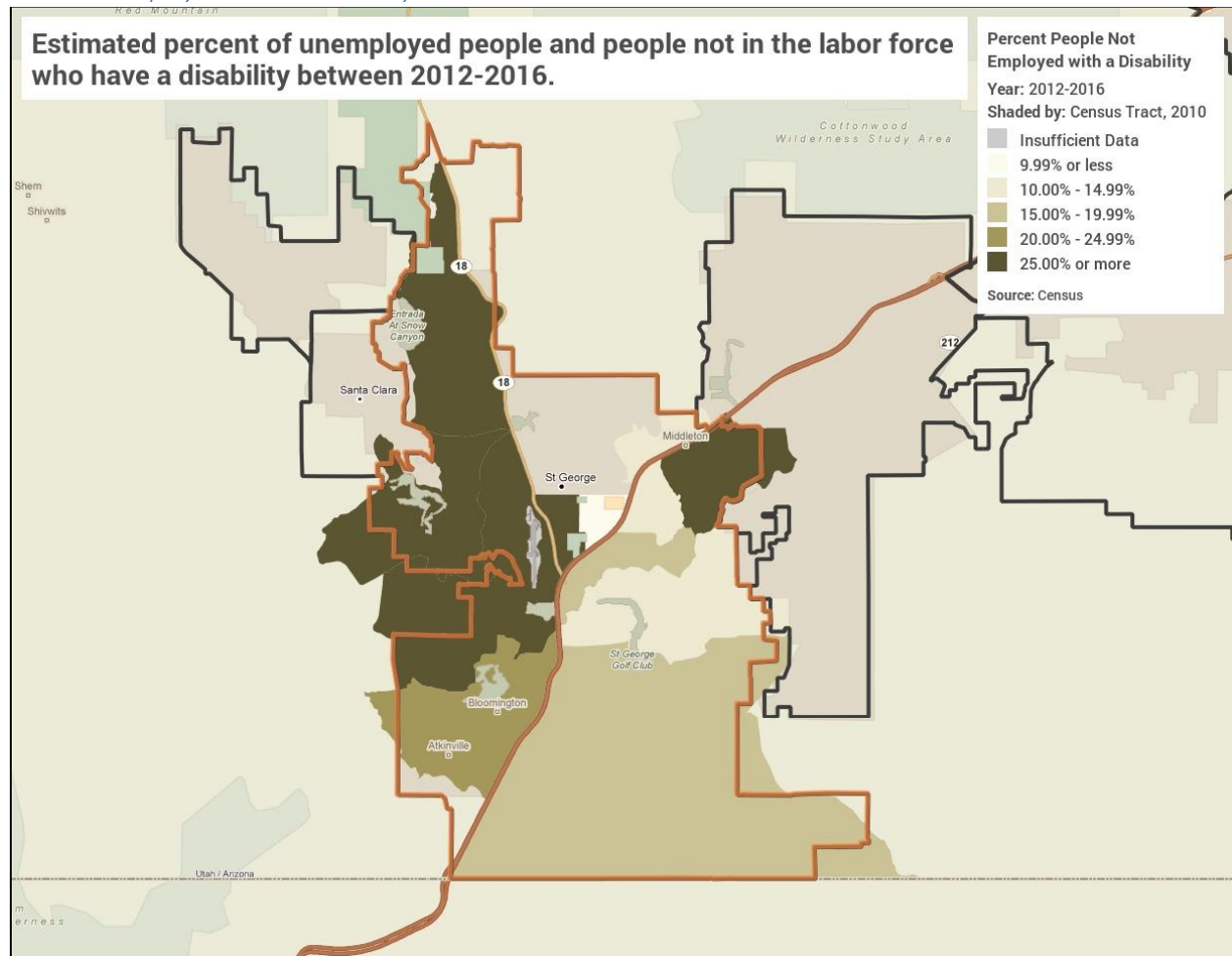
MAP: Elderly with Disability



Source: 2012-2016 ACS via PolicyMap

The area with the highest percent of elderly living with a disability is in the central parts of St. George east of Bluff Street and north of I-15 – over half the elderly population. In general, there is a higher percentage of elderly living with a disability than all other age groups, and in many areas of the city over 40 percent of elderly are living with a disability.

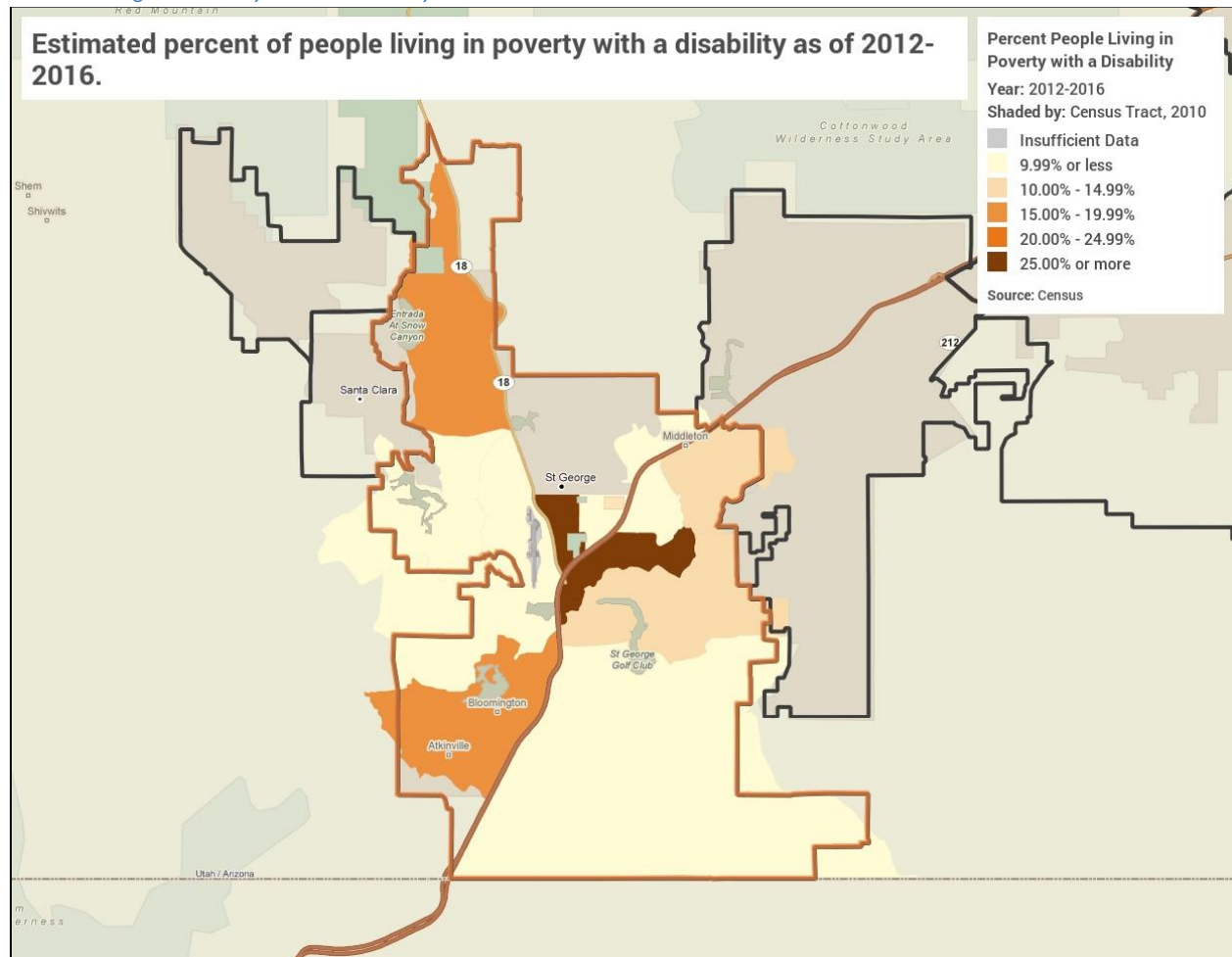
MAP: *Unemployed with a Disability*



Source: 2012-2016 ACS via PolicyMap

There is a higher percentage of unemployed people with a disability living in the northwest and northeast areas of the City.

MAP: Living in Poverty with Disability



Source: 2012-2016 ACS via PolicyMap

The areas with the highest percent of people in poverty living with a disability are in the central parts of St. George east of Bluff Street and north of East Riverside Drive along I-15.

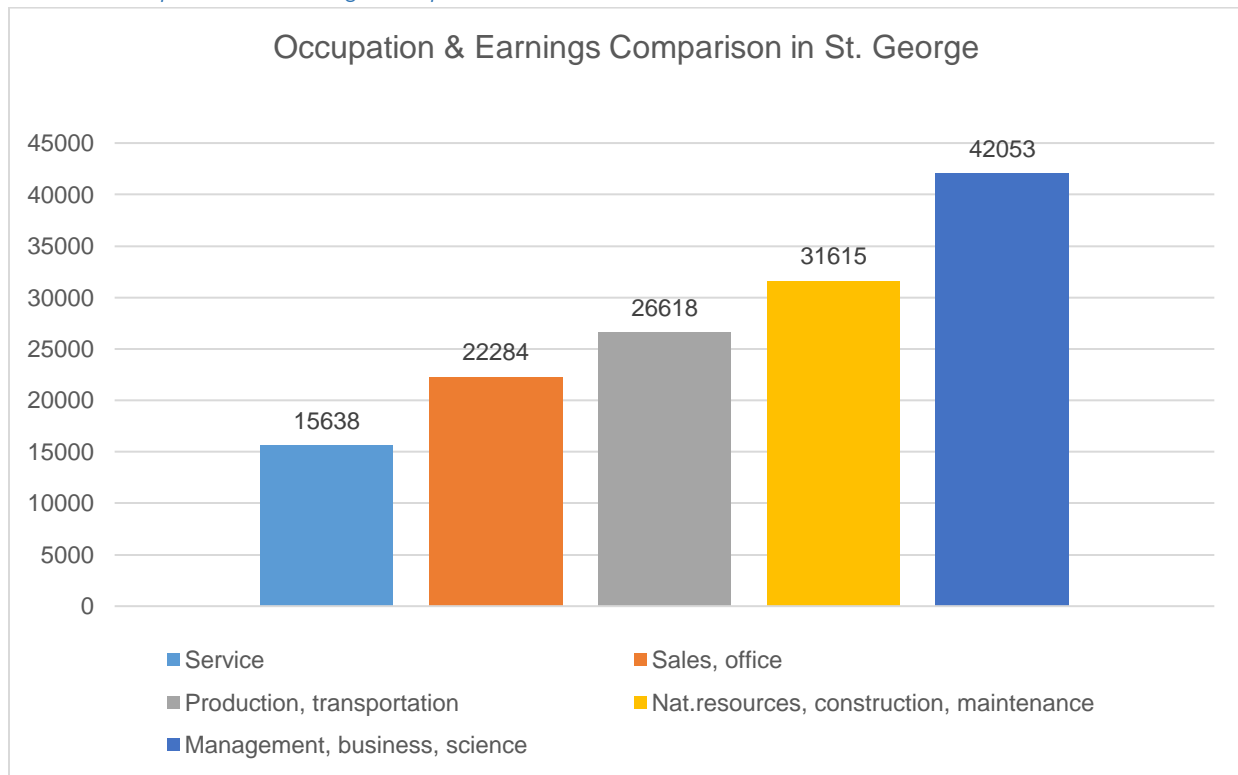
Income

According to 2012-2016 American Community Survey figures, the median household income (MHI) in St. George was \$51,228. This was less than the statewide MHI of \$62,518. However, MHI grew from 2000 to 2016 in the city (40.3%) at a greater rate than the state as a whole (36.7%), which suggests the MHI gap may decrease over time.

TABLE: Median Household Income			
City/State	2000	2016	Percent Change 2000-2016
St. George	36,505	51,228	40.3%
Utah (state)	45,726	62,518	36.7%
Source: 2012-2016 American Community Survey 5-Year Estimates (DP03)			

The citywide median household income can be affected by any number of variables in St. George, but the difference in the type of jobs in the city compared to the state is particularly noteworthy. As discussed in more detail in the Industry and Jobs section, the largest industry by far is Education and Health Care Services with 24 percent, which is in line with the state estimates. However, St. George is unique in that it has a noticeably larger job-producing industry in Retail trade with 16.7 percent, followed by Arts, entertainment, recreation, accommodation and food services at 13.4 percent. The jobs in these industries are predominantly service occupations and sales and office occupations – two of the lowest-earning occupations in the city.

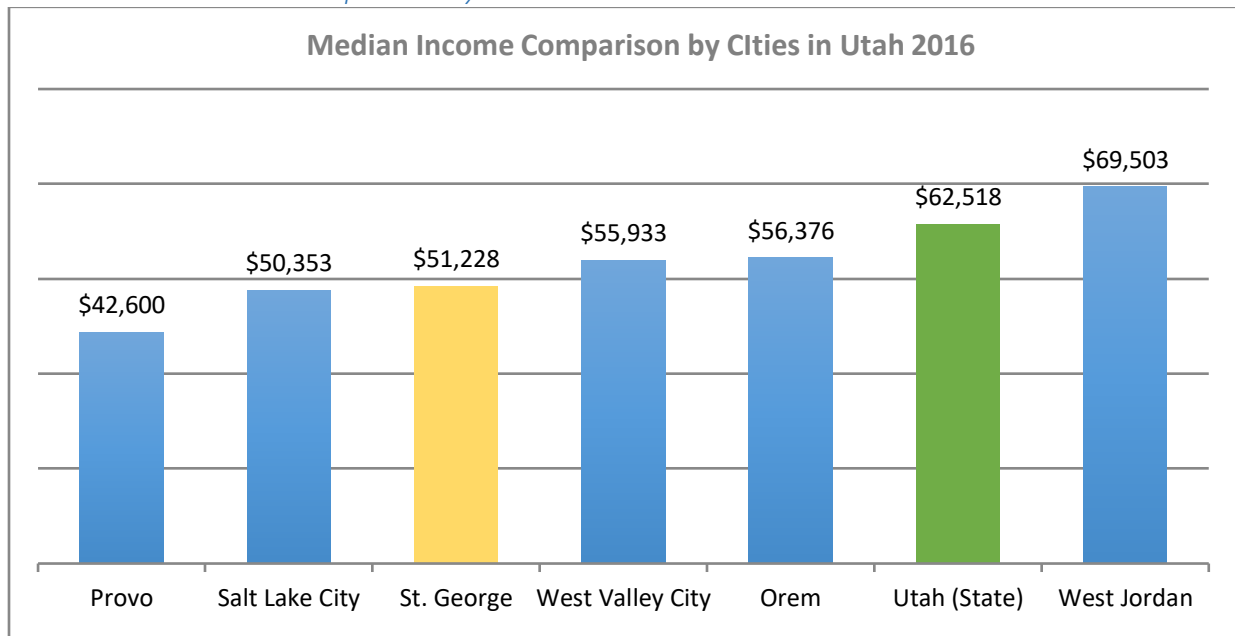
CHART: Occupation & Earnings Comparison



Data Source: 2012-2016 American Community Survey 5-Yr Estimates (S2411)

It must be noted that comparing median household incomes and median earnings is not a “like for like” equation – households may have a combination of persons earning income, whereas median income is tied to the income of one person. However, these two figures, considered in combination, can be a useful indicator of income in the city.

CHART: Median Income Comparisons by Cities in Utah 2016

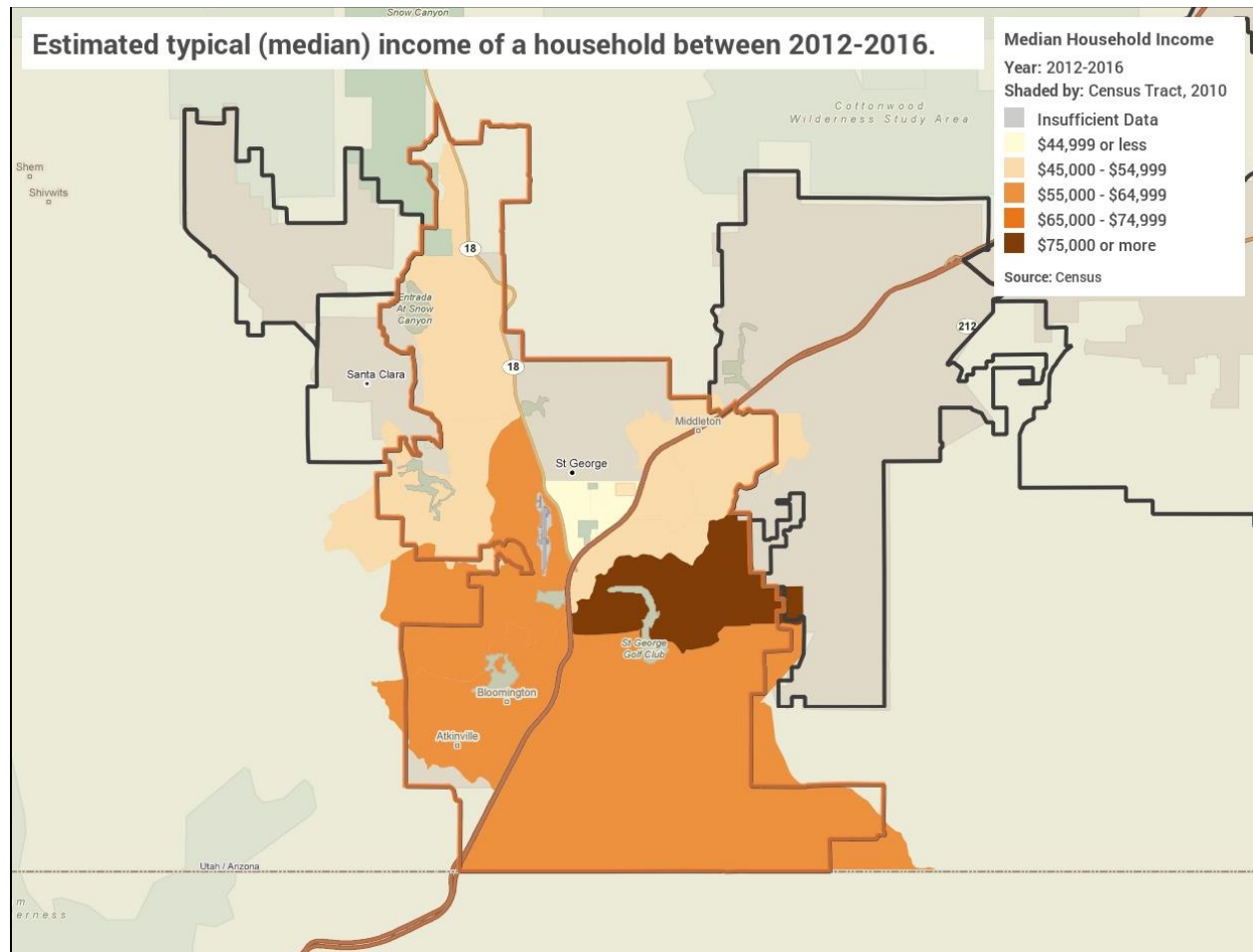


Data Source: 2012-2016 American Community Survey 5-Yr Estimates

The City of St. George has a lower median household income average than the state as a whole. The chart above compares St. George to a select few other cities in the state.

The map below displays the geographical distribution of median household income throughout St. George. Lighter colored shades represent areas with lower MHI and darker shades represent areas with higher MHI. There is a clear concentration of wealth in areas east of I-15/Veterans Memorial Hwy – the only census tract where MHI is \$75,000 or more. On the opposite end of the spectrum, the center of the city between Bluff Street and I-15/Veterans Memorial Hwy has an MHI below \$45,000. It must be noted that the MHI in this area is slightly skewed due to students living near and attending Dixie State University.

MAP: Median Household Income

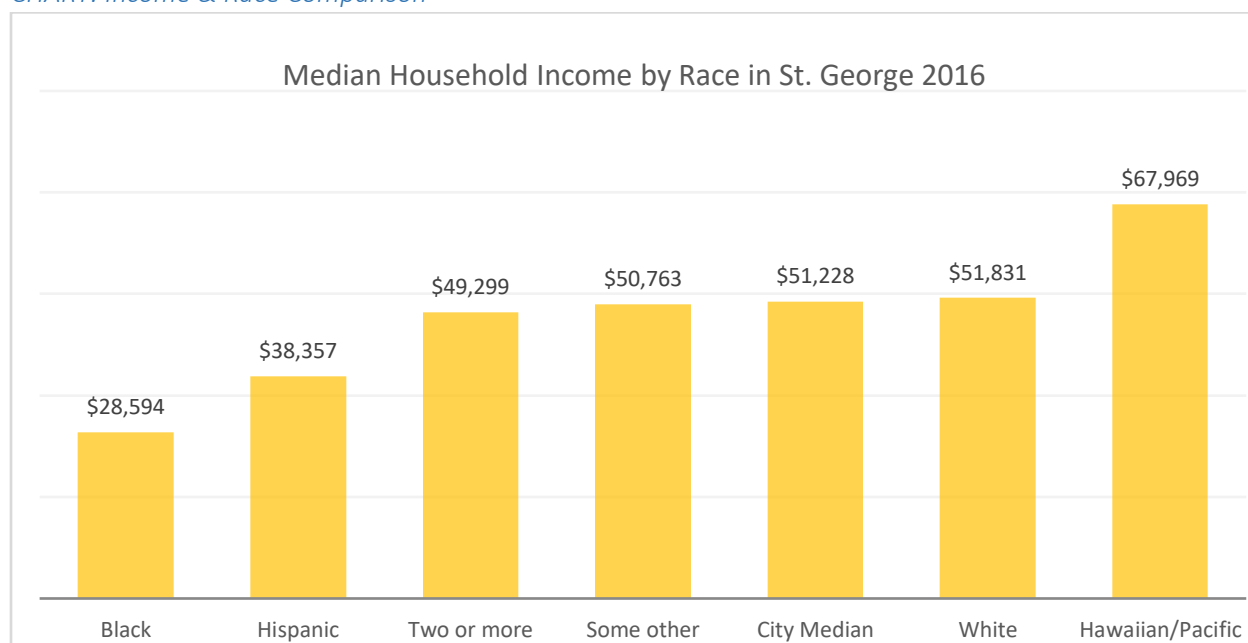


Source: 2012-2016 ACS via PolicyMap

Income and Race

While the 2016 citywide median household income (MHI) was approximately \$51,228, there was a significant disparity among different racial and ethnic groups in the city. Whites, the largest racial group by far in St. George, had an MHI slightly higher than the citywide median with \$51,831. Hispanics (ethnic group), the second largest group in the city, had an MHI much lower than the citywide MHI with \$38,357. Native Hawaiian and Other Pacific Islanders in St. George had the highest MHI of all races by far at \$67,969. All other races earned less than the citywide MHI, and in some cases significantly less. The chart below displays the difference of MHI between all races in the city.

CHART: Income & Race Comparison

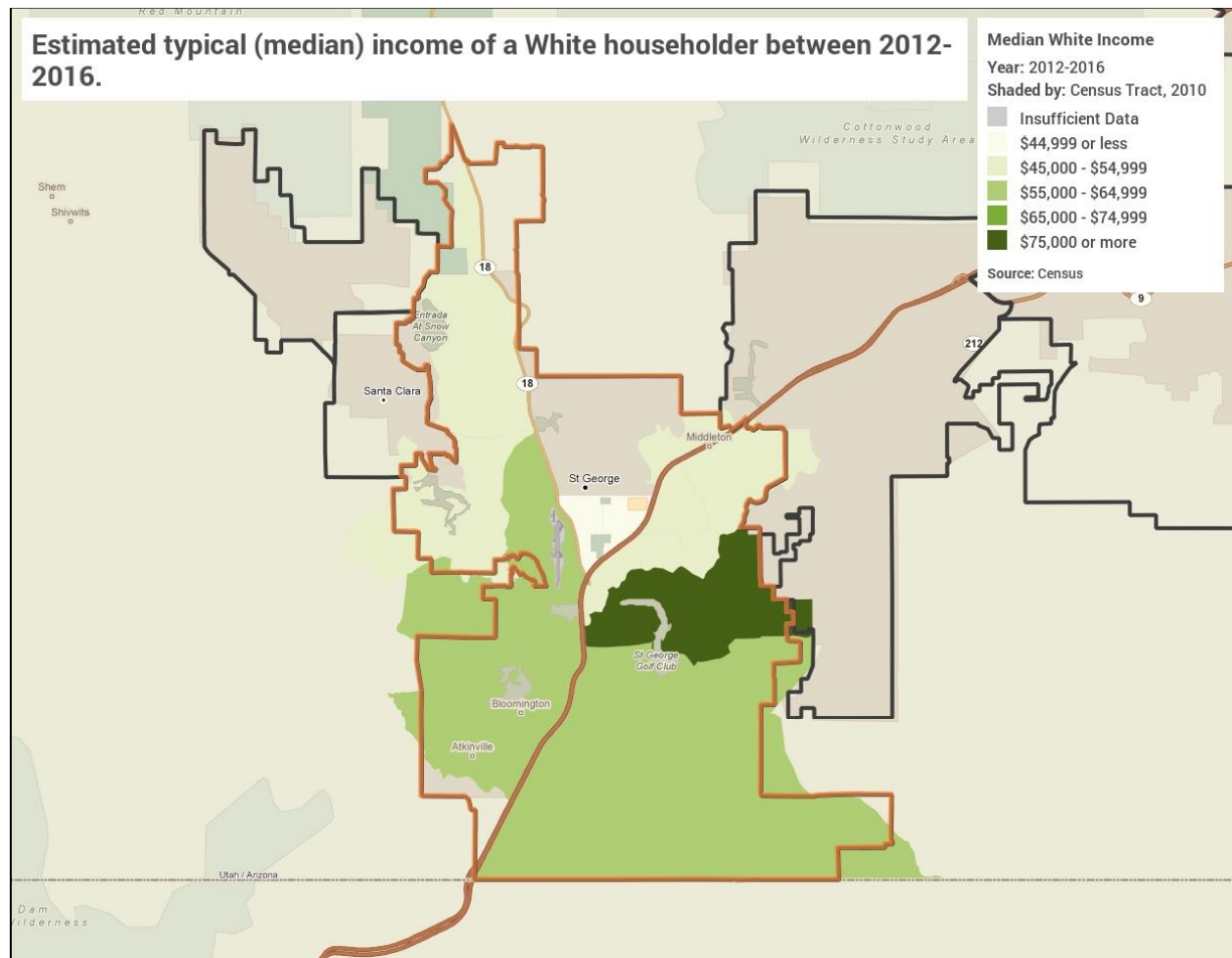


Data Source: 2012-2016 American Community Survey 5-Yr Estimates (S1903)

Data Notes: Data was not available for American Indians/Alaskan Natives and Asians.

The following two maps display racial and ethnic groups and the distribution of median household income in St. George. Lighter shaded areas represent areas where the groups have lower MHIs and darker shaded areas represent areas where the groups have higher MHIs.

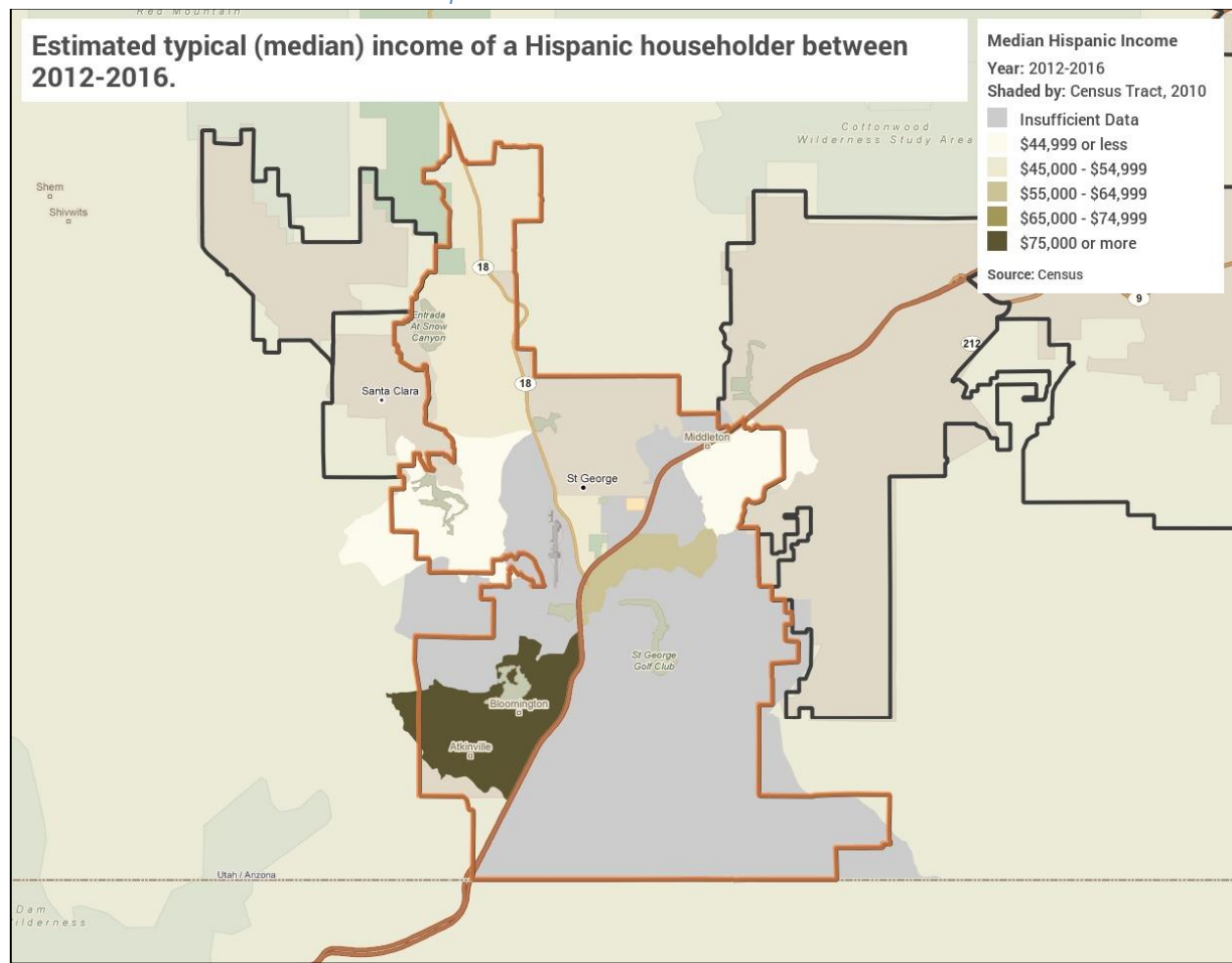
MAP: Median Household Income – White Households



Source: 2012-2016 ACS via PolicyMap

One area in particular has a very low MHI in comparison to the rest of St. George for White households. In the center of St. George between Bluff Street and I-15/Veterans Memorial Hwy, Whites have an MHI of less than \$45,000. Less than a mile away, southeast of this area, Whites have the highest MHI in the city with \$75,000 or more.

MAP: Median Household Income – Hispanic or Latino Households



Source: 2012-2016 ACS via PolicyMap

There are significant differences between MHI for Hispanic residents based on census tract. Two census tracts, to the northeast and northwest of downtown, have an MHI of less than \$45,000. Less than a mile away, southwest of this area, Hispanic and Latino households in St. George have the highest MHI in the city with \$75,000 or more. There is insufficient data in the several areas of the city for this ethnic group.

There was insufficient data to provide income distribution maps for MHI for all other race groups.

Poverty

According to 2012-2016 American Community Survey figures, the poverty rate for all individuals in St. George was 15.6 percent, which was higher than the statewide rate of 11.7 percent. From 2000 to 2016 the poverty rate in the city increased 34.5 percent; during the same time period the state poverty rate grew 24.5 percent. At this rate, the percent of people in poverty in the city will continue to remain higher than in the state as a whole.

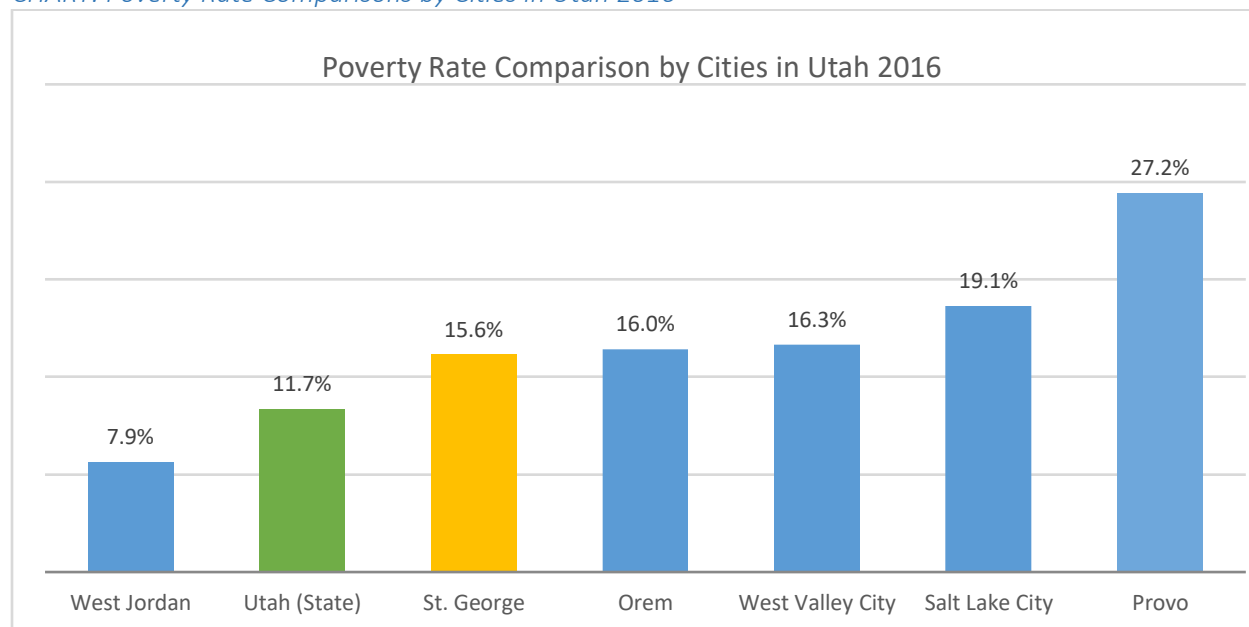
TABLE: Poverty Rate

City/State	Percentage of population in poverty 2000	Percentage of population in poverty 2016	Percent change 2000-2016
St. George	11.6%	15.6%	34.5%
Utah (state)	9.4%	11.7%	24.5%

Source: Census 2000, 2012-2016 American Community Survey 5-Year Estimates (S1701)

While St. George has a poverty rate higher than the state as a whole, the poverty rate in the city is still lower than several comparable cities in the state.

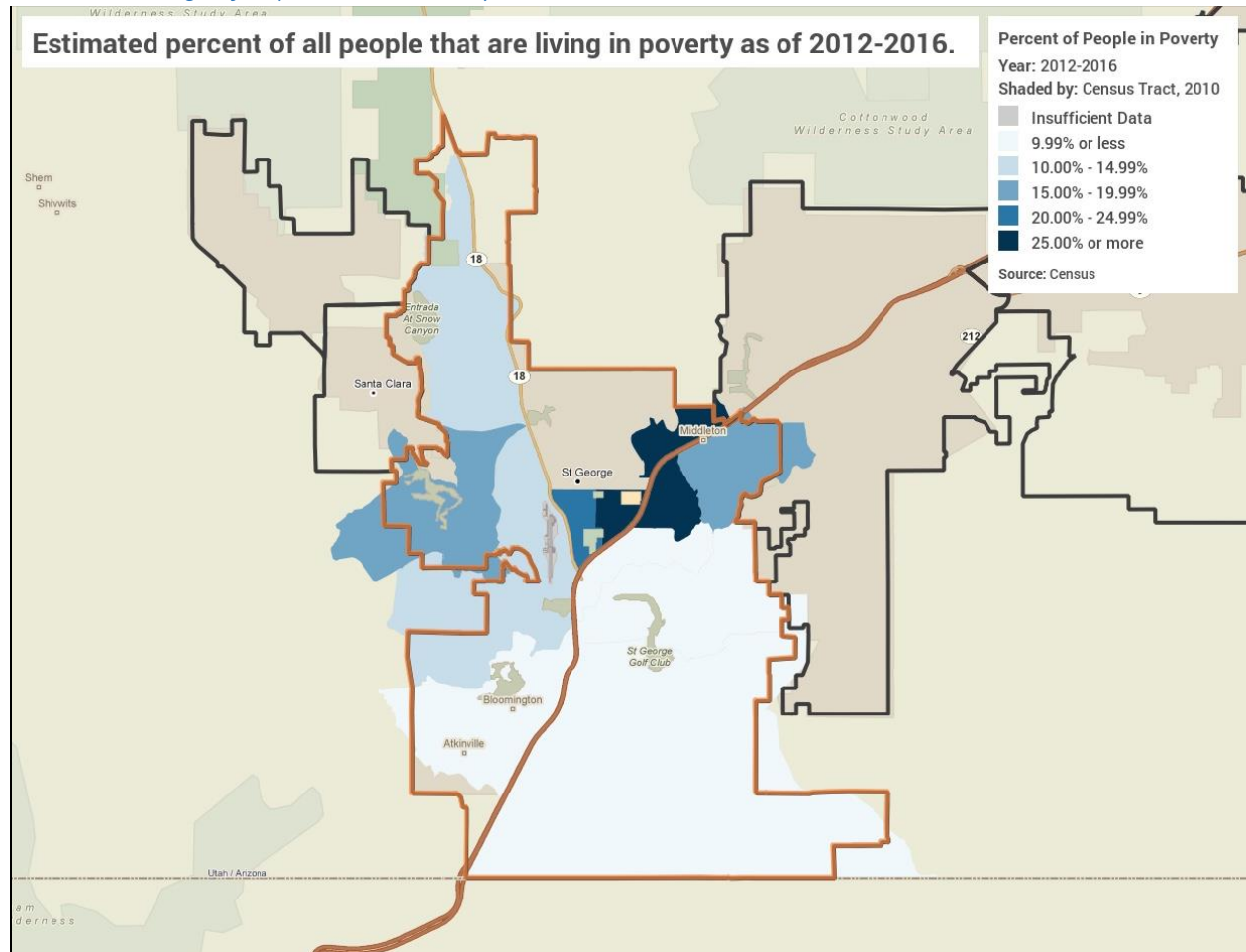
CHART: Poverty Rate Comparisons by Cities in Utah 2016



Data Source: 2012-2016 American Community Survey 5-Yr Estimates

The following series of maps displays the geographical distribution of poverty throughout St. George. The lighter shaded areas represent a smaller percent of families in poverty and the darker shaded areas represent a higher percent of families in poverty.

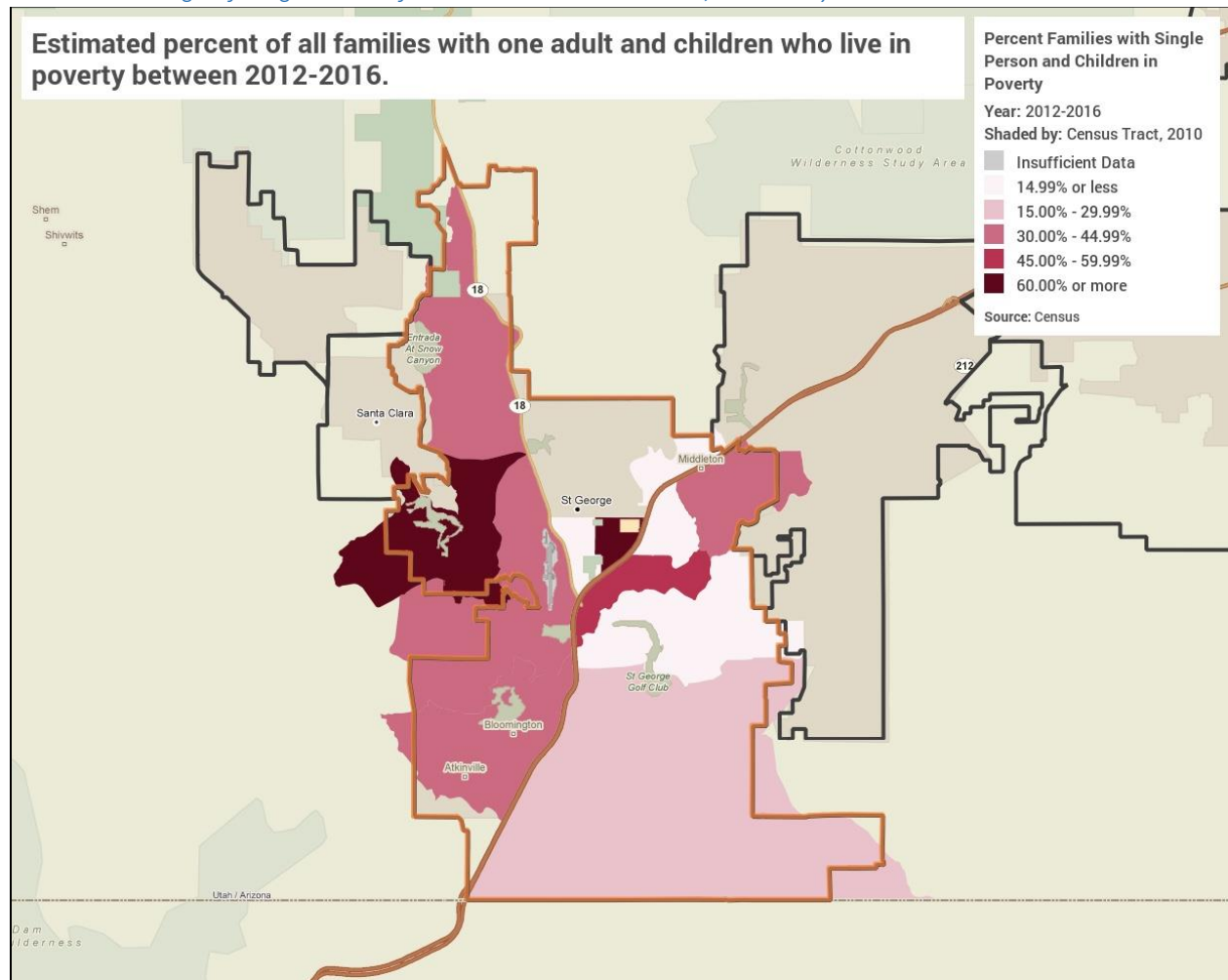
MAP: Percentage of Population in Poverty



Source: 2012-2016 ACS via PolicyMap

Census tracts in the center and northeast area of St. George following I-15 have 25 percent or more persons living in poverty, which is the highest in the city. Just southeast of the interstate, and in southwest areas of St. George, persons living in poverty drop to 9.9 percent or less – among the lowest percentage areas in the city, and much less than the citywide rate of 15.6 percent.

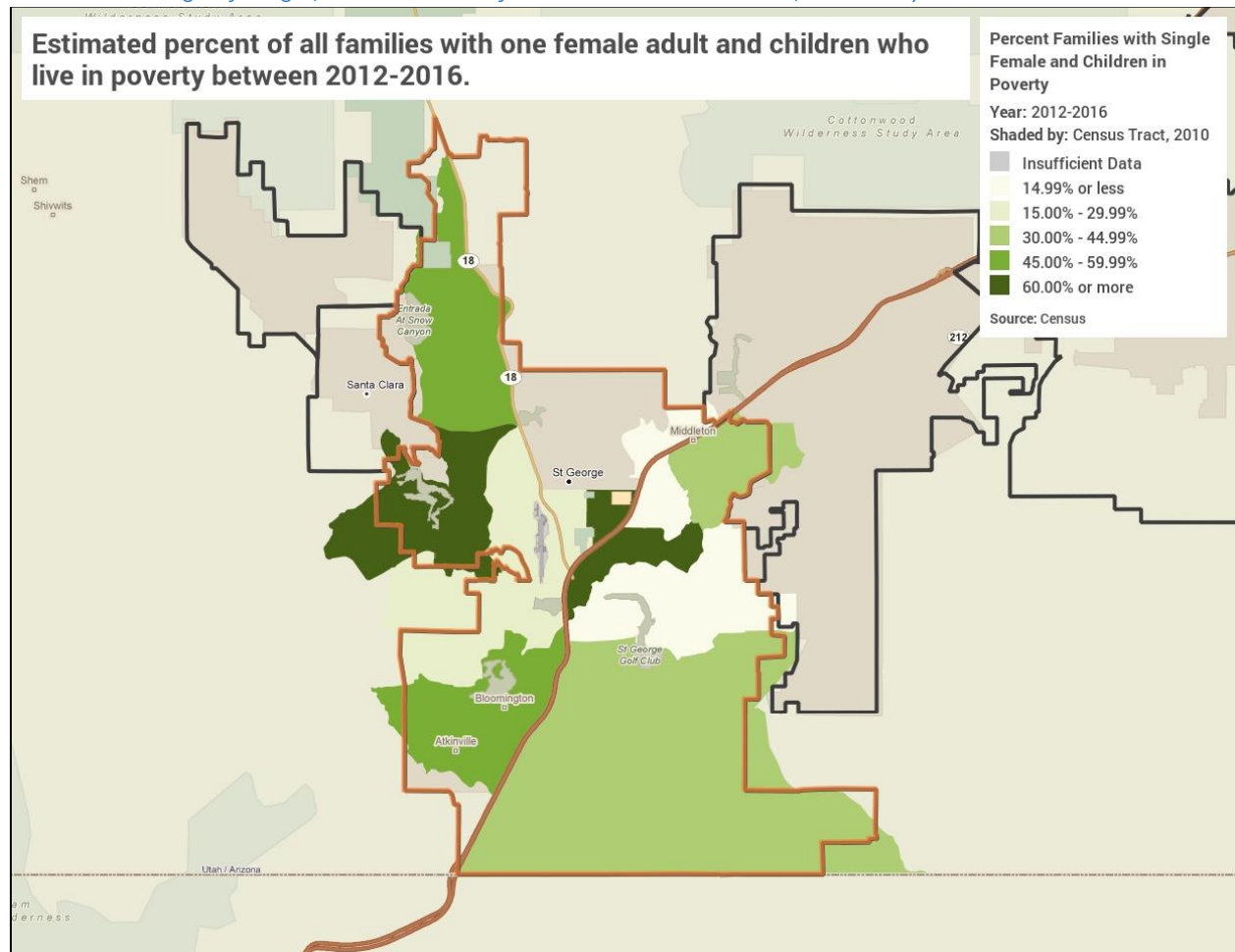
MAP: Percentage of Single Head of Households with Children, in Poverty



Source: 2012-2016 ACS via PolicyMap

There are high concentrations of single-headed families with children in poverty throughout the northern areas of the city, particularly on the western part of the city and the east part of downtown. These areas have a poverty rate of single-parent families of 60 percent or more.

MAP: Percentage of Single, Female Head of Household with Children, in Poverty



Source: 2012-2016 ACS via PolicyMap

High concentrations of single female-headed families with children in poverty are located throughout the city in similar areas as single-headed families with children in poverty (from previous map) – especially the northwest area of St. George and just south along I-15.

Poverty and Race

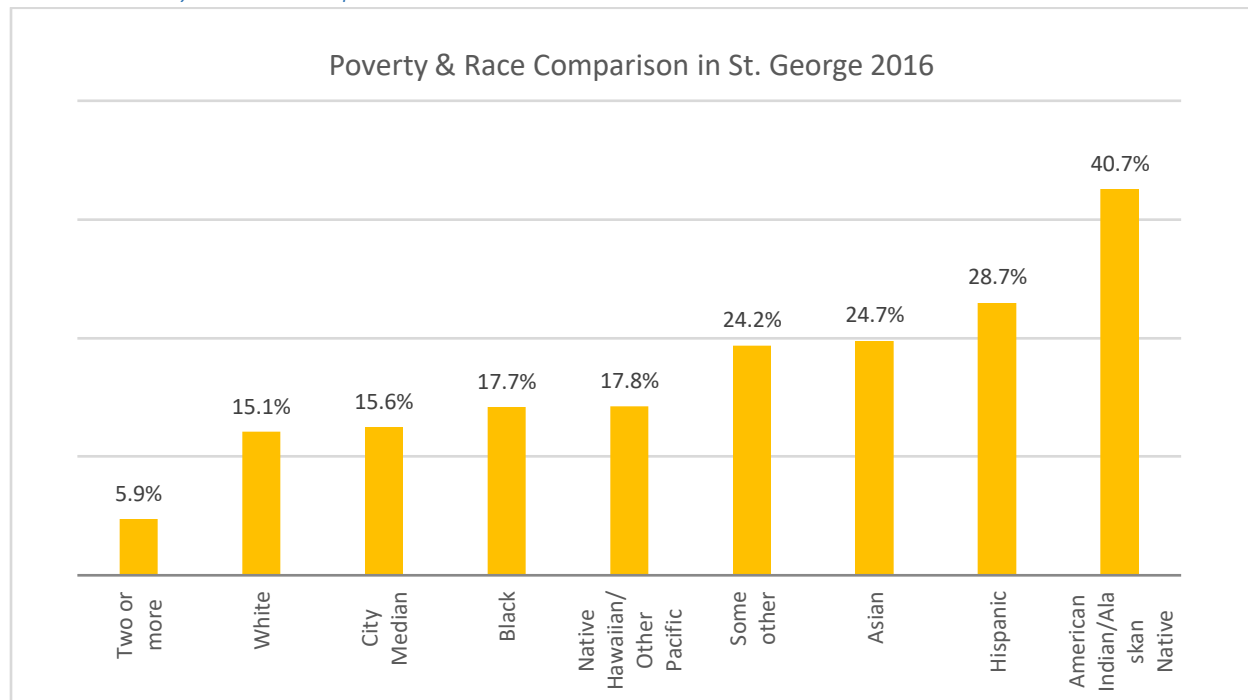
The 2016 citywide poverty rate was 15.6 percent, but there was significant disparity among differing racial and ethnic groups. Whites, the largest racial group in St. George, had a slightly lower poverty rate than the citywide rate. In comparison, Blacks and African Americans, Asians, American Indian and Alaska Natives and individuals identifying ethnically as Hispanic or Latino had poverty rates higher than the citywide rate – in some cases at more than twice the poverty rate.

TABLE: Poverty and Racial / Ethnic Composition

Race	Estimate	Percentage
White	10,478	15.1%
Black or African American	121	17.7%
American Indian and Alaska Native	339	40.7%
Asian	118	24.7%
Native Hawaiian / Other Pacific Islander	146	17.8%
Some other race	812	24.2%
Two or more races	118	5.9%
Hispanic or Latino (of any race)	2,920	28.7%
St. George	12,132	15.6%
Source: 2012-2016 American Community Survey 5-Year Estimates (S1701) Data Note: Hispanic and Latino identify as an ethnic group.		

The following chart visually compares the 2016 poverty rate of all races and individuals that identify ethnically as Hispanic against the citywide poverty rate.

CHART: Poverty & Race Comparison

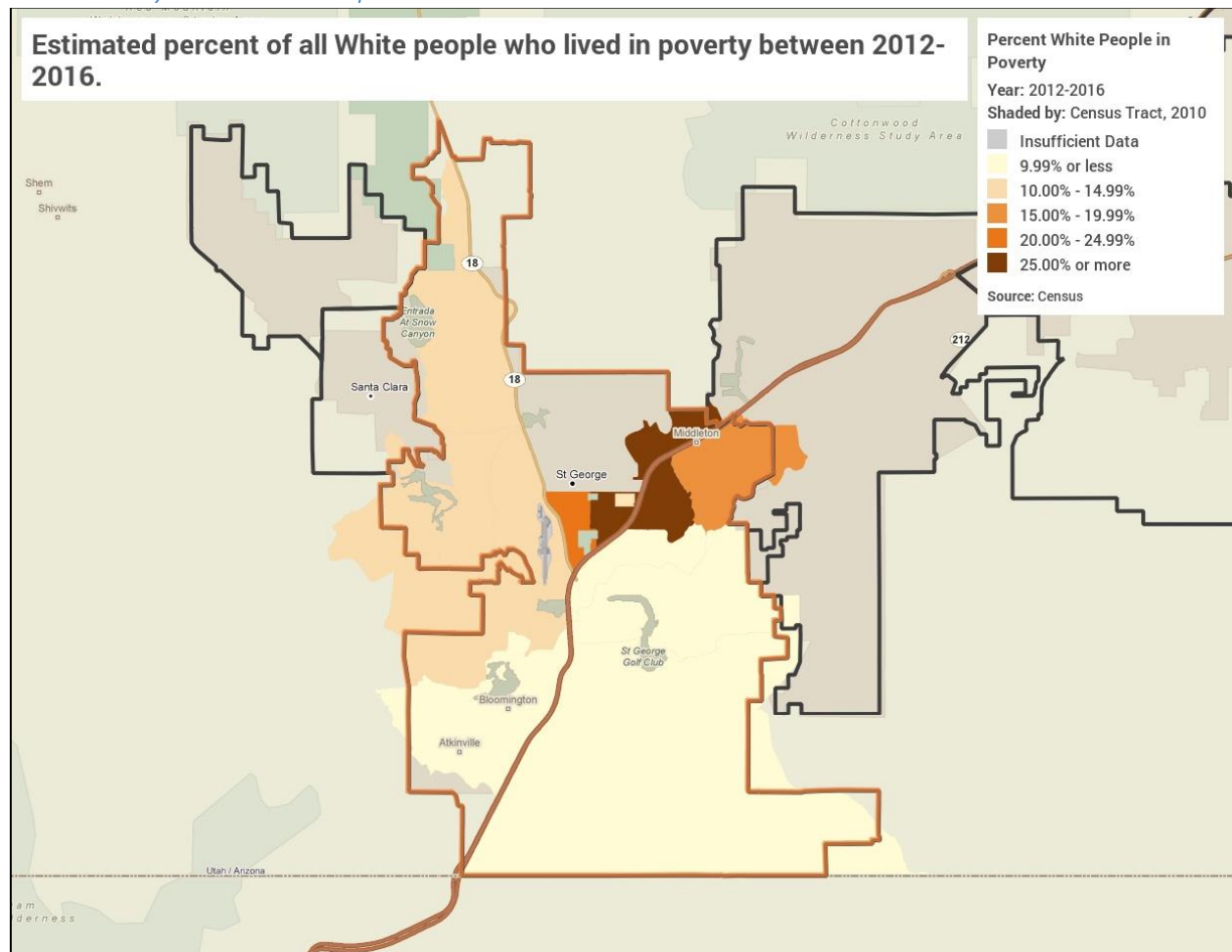


Data Source: 2012-2016 American Community Survey 5-Yr Estimates

While the citywide poverty rate was 15.6 percent in 2016, American Indians and Alaskan Natives had a drastically disproportionate poverty level as compared to the rest of St. George at 40.7 percent. The high margin of error (+/- 23.7%) of this assessed poverty level should be noted, though not dismissed. Individuals that identified as ethnically Hispanic also had a disproportionate poverty level with 28.7 percent.

The following series of maps displays the poverty rate based on race or ethnicity. Lighter shaded areas represent areas where the particular groups have lower rates of poverty and darker shaded areas represent areas where the groups have higher poverty rates.

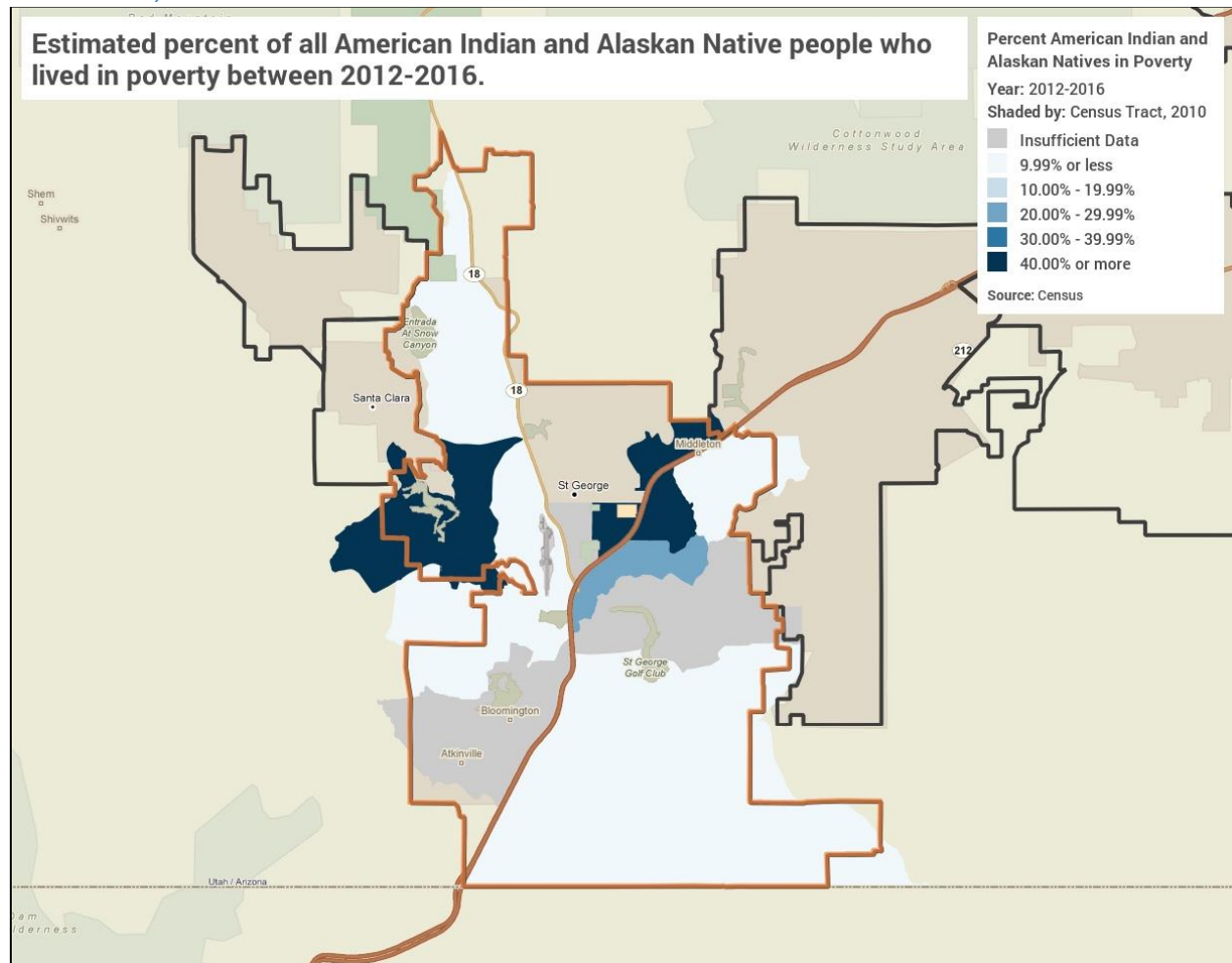
MAP: Poverty Rate – White Population



Source: 2012-2016 ACS via PolicyMap

Poverty rates were highest for White Americans along the northern areas following I-15. This area had poverty rates of 25 percent or more.

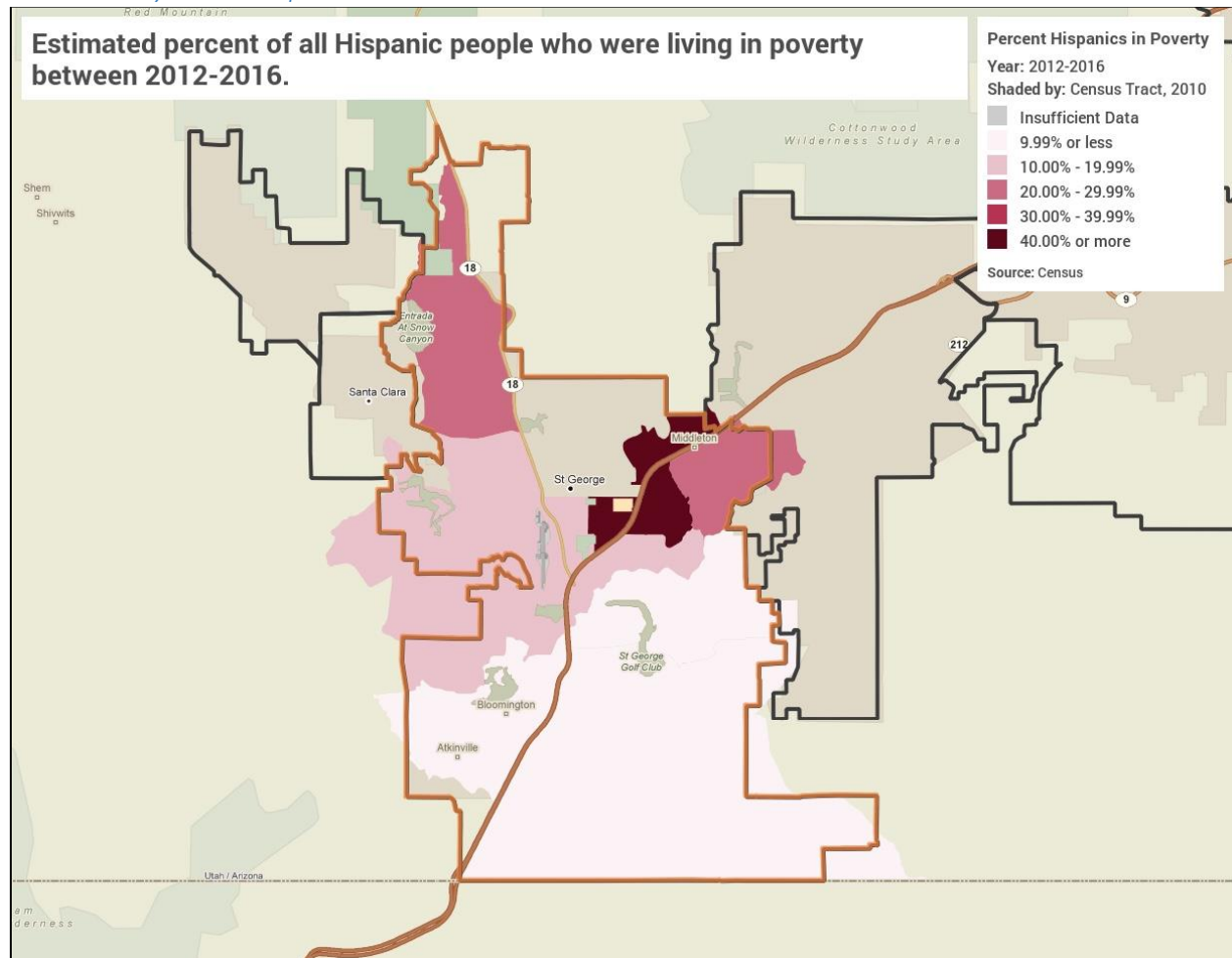
MAP: Poverty Rate – American Indian and Alaskan Native



Source: 2012-2016 ACS via PolicyMap

Poverty rates were highest for American Indian and Alaskan Natives in the northwestern areas and the eastern downtown areas near the I-15 corridor. There are a lot of incomplete data for this demographic, but the available information shows that tracts with high poverty rates are similar to the overall distribution of people in poverty in the city.

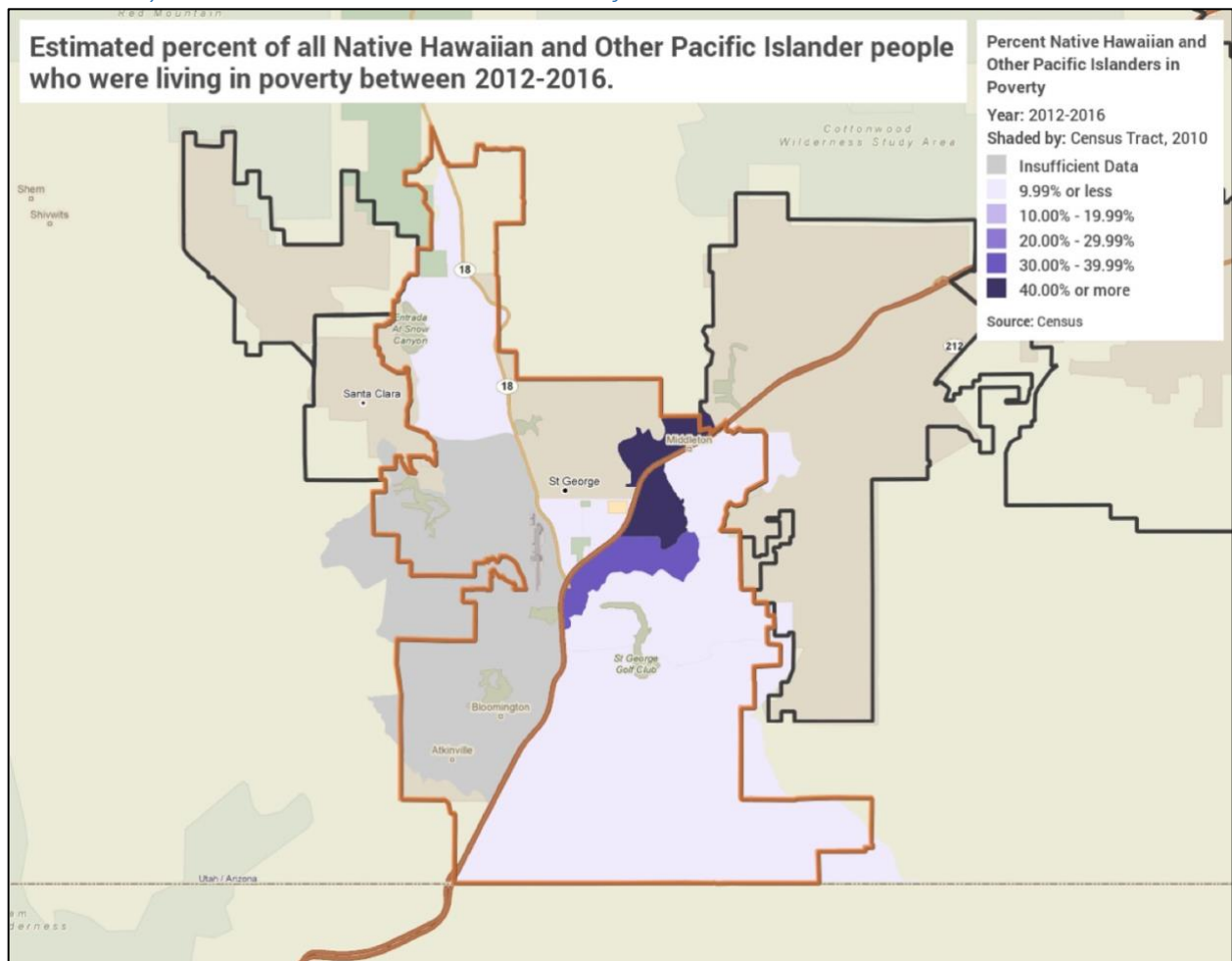
MAP: Poverty Rate – Hispanic or Latino



Source: 2012-2016 ACS via PolicyMap

Hispanic or Latino persons had higher poverty rates along the northern areas following I-15 and the northwestern border of the city. For this ethnic group, tracts with high poverty rates are similar to the overall distribution of people in poverty in the city.

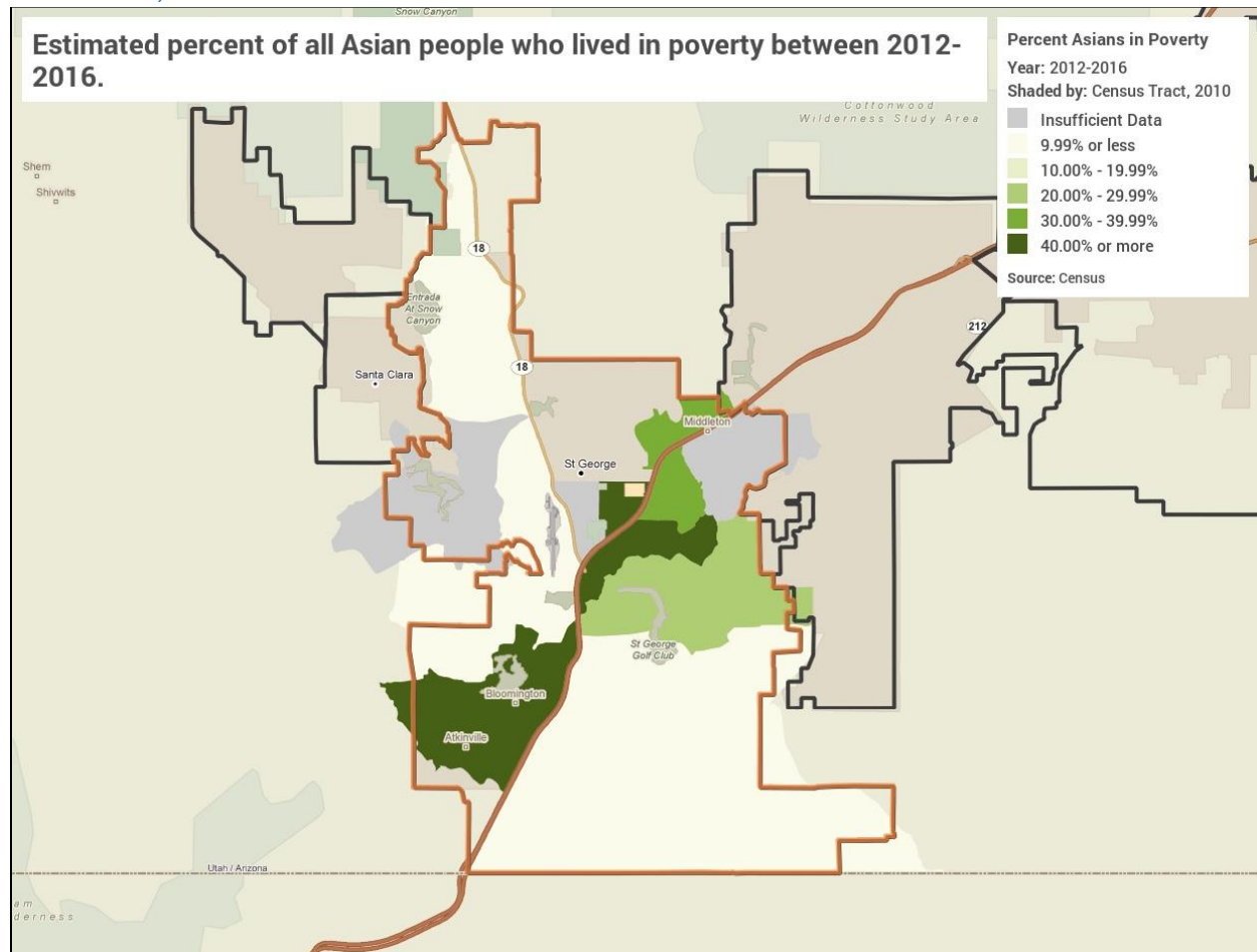
MAP: Poverty Rate – Native Hawaiian and Other Pacific Islander



Source: 2012-2016 ACS via PolicyMap

Native Hawaiian and Other Pacific Islander persons also had higher poverty rates in the Census tracts in the center and northeast area of St. George following I-15. For this ethnic group, tracts with high poverty rates are similar to the overall distribution of people in poverty in the city.

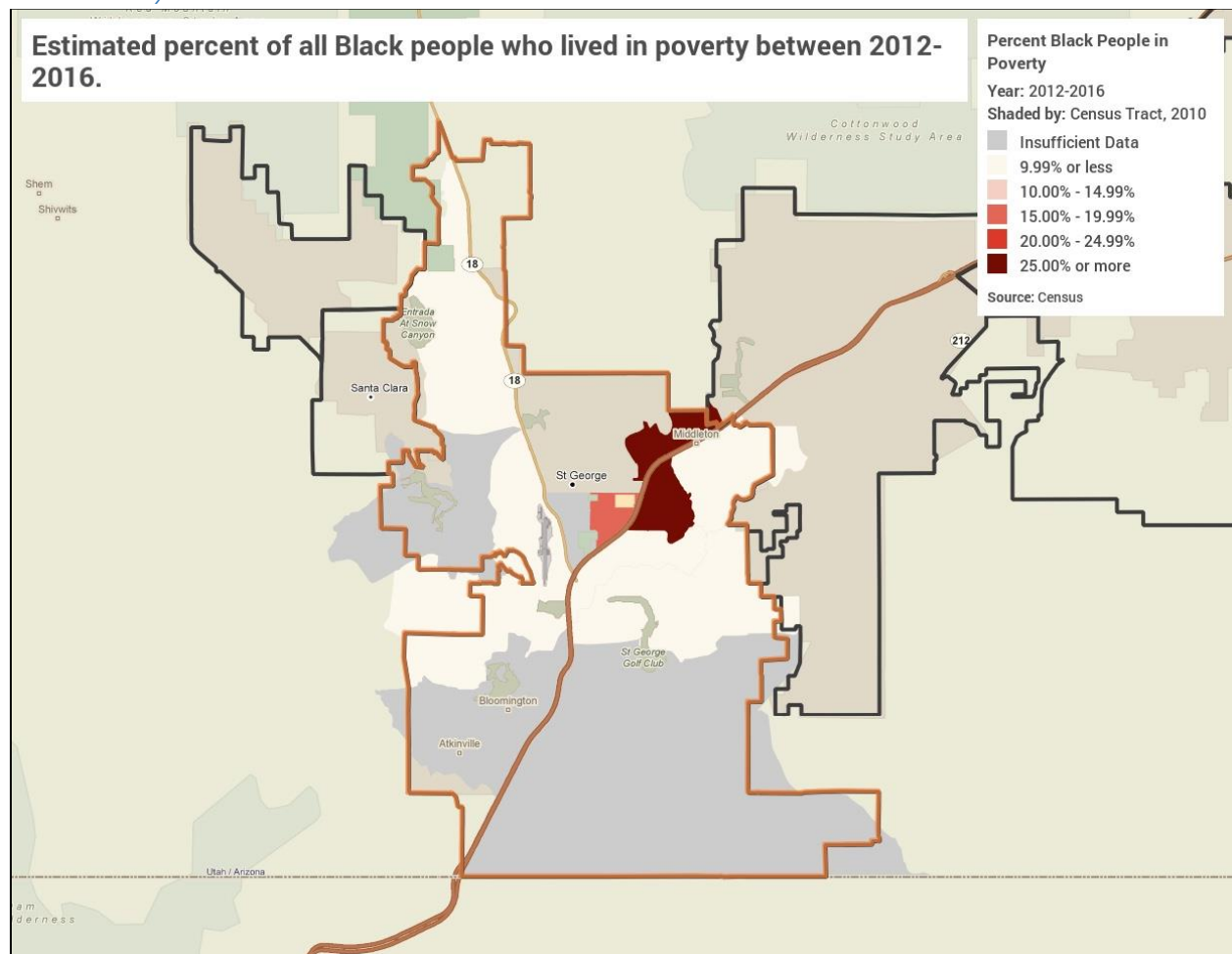
MAP: Poverty Rate – Asian



Source: 2012-2016 ACS via PolicyMap

Within the Asian population, residents had the highest poverty rates along the I-15 corridor. Tracts to the southeast of the freeway and downtown had poverty rates of 40% or more.

MAP: Poverty Rate – Black



Source: 2012-2016 ACS via PolicyMap

Poverty rates for black residents is disproportionately high in the northeast part of the City. These tracts have poverty rates of 25% or more.

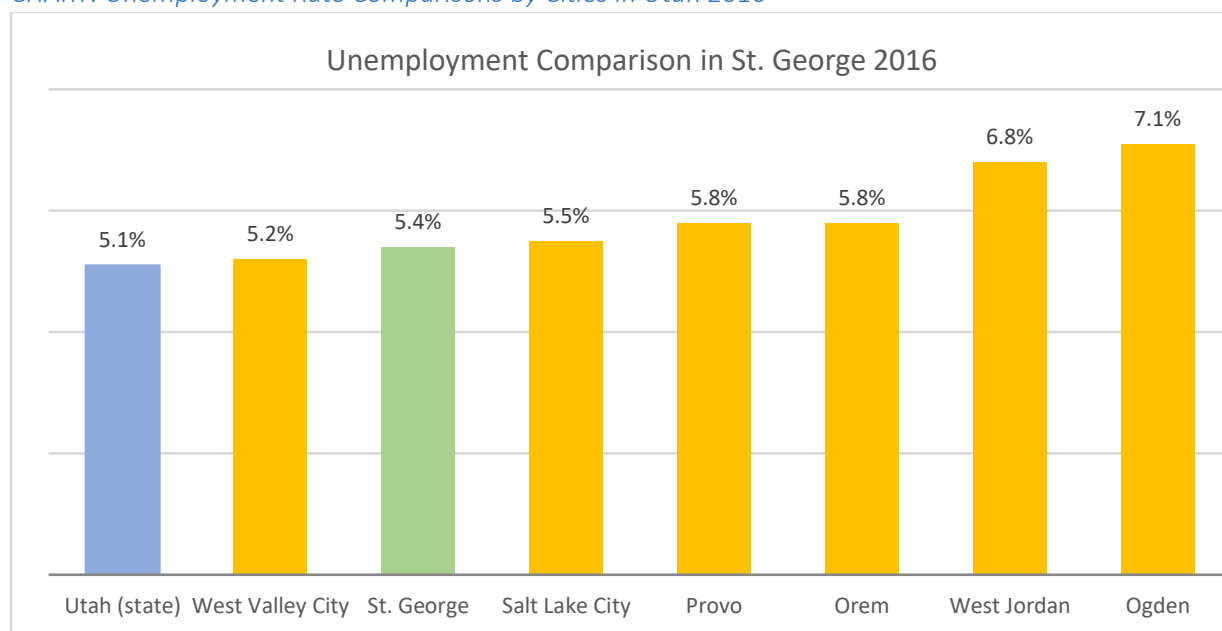
Employment

According to 2012-2016 American Community Survey figures, the unemployment rate for all individuals in St. George was 5.4 percent. This was slightly higher than the state rate of 5.1 percent. From 2000 to 2016 the unemployment rate in the city decreased 11.5 percent; during the same time period the statewide unemployment rate grew by 2 percent. St. George and Utah, like the rest of the country, were hit hard by the Great Recession of 2007-2009, but St. George is recovering.

TABLE: Unemployment Rates			
Area	Percent unemployed 2000	Percent unemployed 2016	Percent change 2000-2016
St. George	6.1%	5.4%	-11.5%
Utah (state)	5.0%	5.1%	2.0%
Source: Census 2000, 2012-2016 American Community Survey 5-Year Estimates (DP03)			

The following chart compares the unemployment rate of St. George (5.4%) against other major cities in Utah including the statewide rate (5.1%). While St. George has a higher unemployment rate than the statewide rate, it compares favorably among some of the other major cities in Utah.

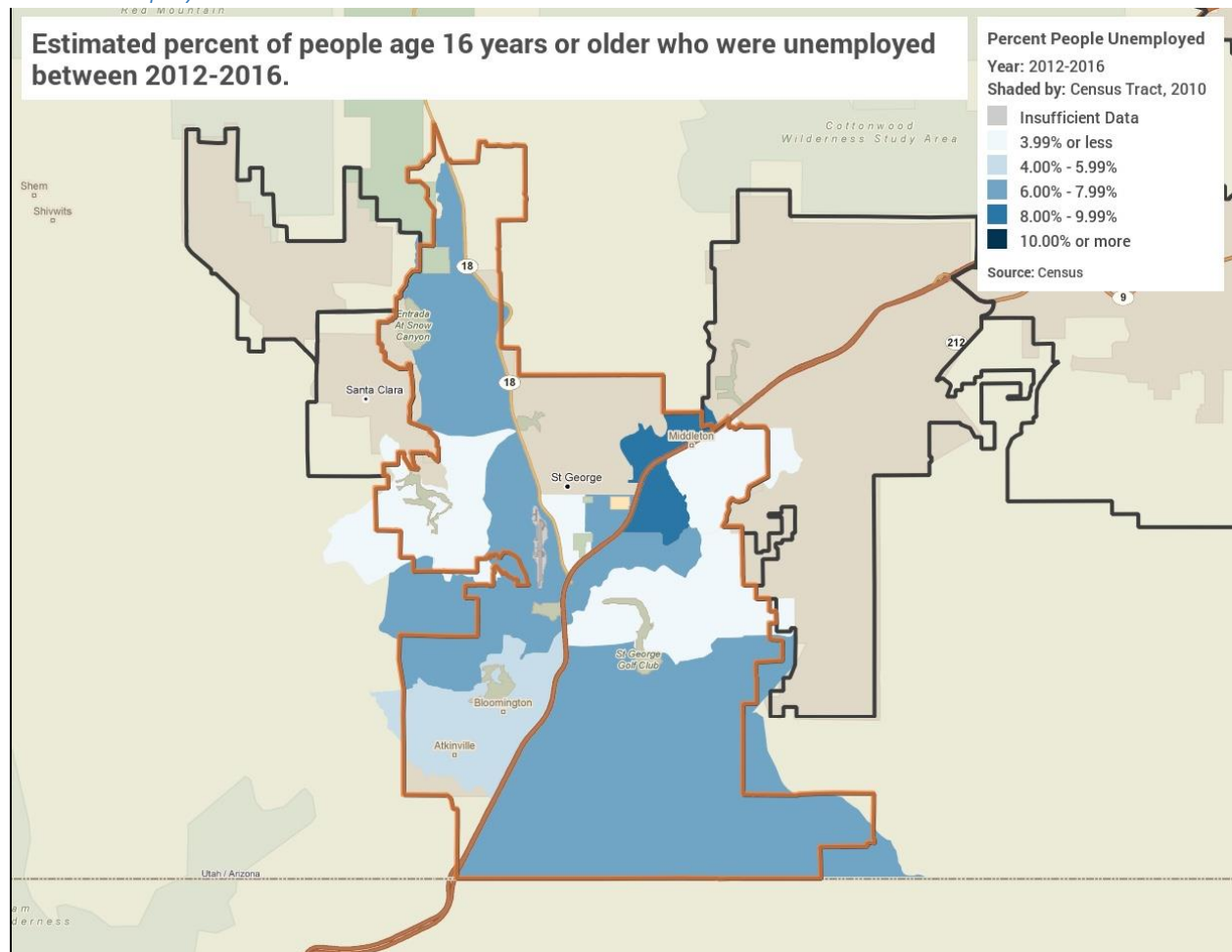
CHART: Unemployment Rate Comparisons by Cities in Utah 2016



Data Source: 2012-2016 American Community Survey 5-Yr Estimates

The map below shows the geographical distribution of the unemployment rate throughout St. George. The lightest shade of blue represents areas with the lowest unemployment rate, and the unemployment rate increases as the shade darkens. According to the 2012-2016 ACS, one area of the city has an unemployment rate higher than 8%. This area is located in the northeast area of the city along the I-15 corridor.

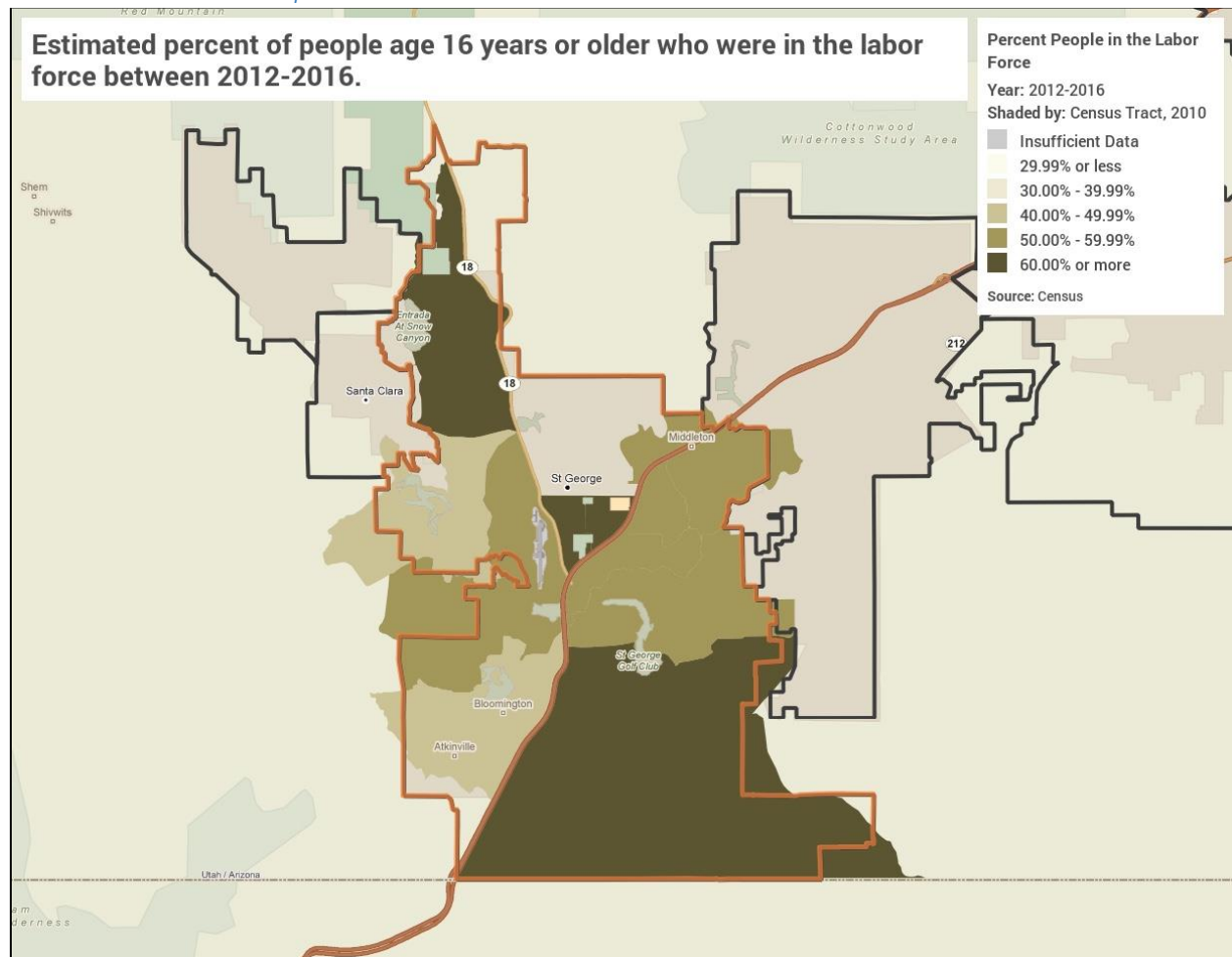
MAP: Unemployment Rate



Source: 2012-2016 ACS via PolicyMap

The map below displays the geographical distribution of the labor force in St. George. The lightest shade represents areas where the percentage of the population participating in the labor force is less. The percent participating in the labor force increases as the shade darkens. The concentration of the St. George's labor force is spread out across the city, however there is less of a concentration in two areas on the western border.

MAP: Labor Force Participation Rates

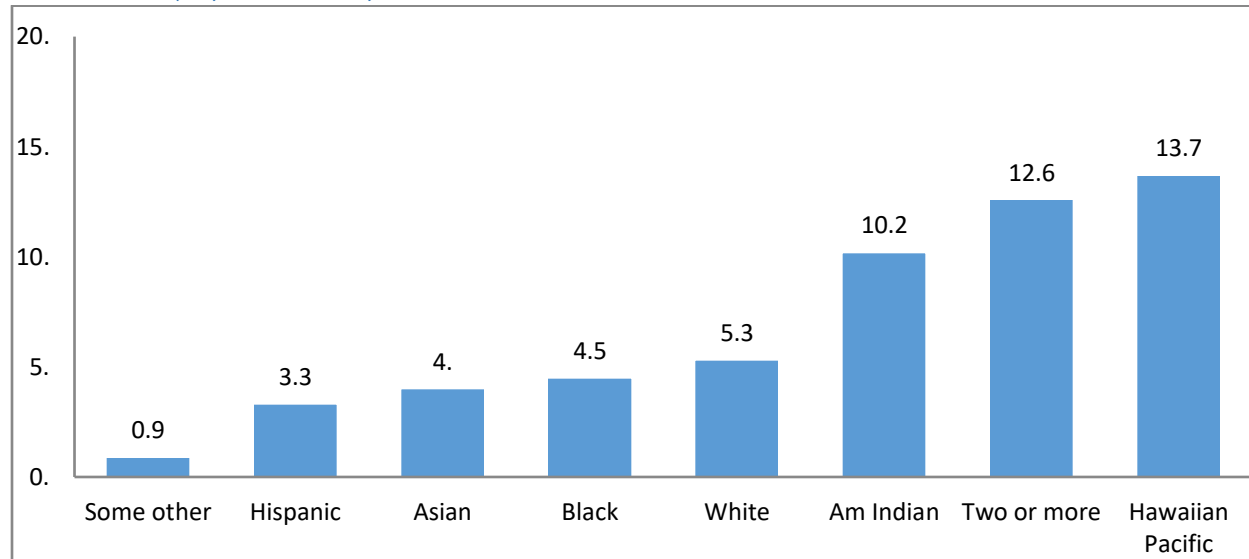


Source: 2012-2016 ACS via PolicyMap

Unemployment and Race

The City of St. George's unemployment rate was 5.4% in 2016, but the rate varied widely by race. American Indians, Hawaiian and Other Pacific Islanders, and residents who identify as two or more races had disproportionately high levels of unemployment. The chart below displays a comparison for unemployment rates for each race group.

CHART: Unemployment Rate by Race



Data Source: 2012-2016 American Community Survey 5-Yr Estimates (S2301)

Jobs by Industry

The table below outlines the labor statistics in St. George by industry. The largest industry by far is Education and Health Care Services at 23.9 percent. The second largest job-producing industry is Retail trade with 16.4 percent, followed by Arts, entertainment, recreation, accommodation and food services at 14.5 percent. Many industries are within 1-2 percent of the state representation, though some key industries do stand out. St. George has a very small sector in Manufacturing compared to the State, while the city has larger sectors in Arts, entertainment, recreation, accommodation and food services and Retail trade. It should be noted that according to the Bureau of Labor Statistics, the fastest growing sector in the United States is the Health Care and Social Assistance sector while Manufacturing is one of the most rapidly declining sectors in the US.

Large business sectors in Arts, entertainment, recreation, accommodation and food services and Retail trade can be attributed to the outdoor natural attractions and tourism that the city has available. Including the natural park attractions nearby, there are five national parks in the southern half of Utah, with Grand Canyon National Park also nearby (approximately 135 miles southeast of St. George).

St. George also serves as an important hub for travelers commuting between Salt Lake City and Las Vegas, NV. It is the first major city in Utah for travelers traveling into the state from Nevada on I-15, which is approximately 120 miles southwest of the city.

TABLE: Business by Sector				
Industry	Number of Workers	Share of Workers (%)	Number of Workers	Share of Workers (%)
	St. George		Utah	
Agriculture, forestry, fishing and hunting, mining	181	0.6%	27,264	2.0%
Construction	2,451	7.6%	89,593	6.5%
Manufacturing	1,709	5.3%	148,823	10.8%
Wholesale trade	583	1.8%	35,772	2.6%
Retail trade	5,251	16.4%	166,843	12.1%
Transportation and warehousing, and utilities	1,410	4.4%	63,570	4.6%
Information	824	2.6%	31,602	2.3%
Finance and insurance, real estate, rental, leasing	1,696	5.3%	91,093	6.6%
Professional, scientific, management, administrative and waste management services	3,333	10.4%	164,485	12.0%
Educational services, health care, social assistance	7,664	23.9%	301,073	21.9%
Arts, entertainment, recreation, accommodation and food services	4,653	14.5%	125,293	9.1%
Other services, except public administration	1,324	4.1%	61,426	4.5%
Public administration	996	3.1%	67,309	4.9%
Total	32,075	-	1,374,146	-
Source: 2012-2016 American Community Survey 5-Year Estimates (DP03)				

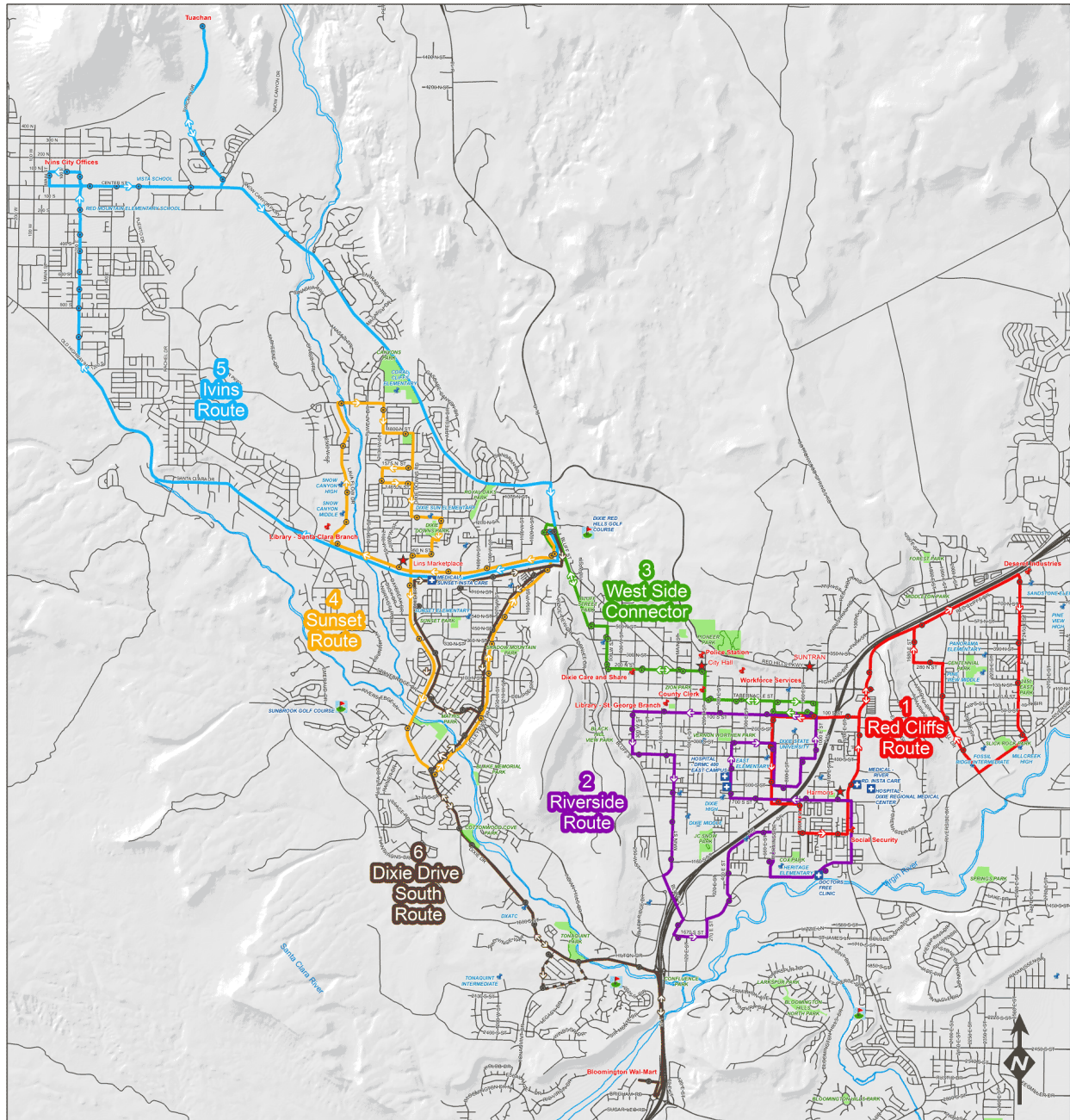
Transportation

According to 2012-2016 American Community Survey figures, driving a vehicle alone is by far the most popular form of transportation in St. George with 79.6 percent of the labor force using their personal vehicles for their work commute. A distant second is carpooling (10.9%), followed by walking (3.1%) and working from home (3.6%). These figures are all consistent with statewide rates with the exception of public transportation. Notably, statewide commuters as a whole take public transportation 4 times more than commuters in St. George. In the city, 5 times more people walk to work than take public transportation. A more robust public transportation system in St. George will open up new employment opportunities to residents, thereby expanding housing options.

TABLE: Commuting to Work (Method)		
	St. George (%)	Utah (%)
Workers 16 years and over	31,174	1,355,380
Car, truck, or van	90.5%	87.5%
Drove alone	79.6%	75.9%
Carpooled	10.9%	11.6%
Public transportation (excluding taxicab)	0.6%	2.6%
Walked	3.1%	2.6%
Bicycle	1.0%	0.8%
Taxicab, motorcycle, or other means	1.3%	1.1%
Worked at home	3.6%	5.4%
Source: 2012-2016 American Community Survey 5-Yr Estimates (S0801)		

SunTran is St. George's public transit system. Routes run Monday through Saturday, but there are only 6 routes in the city. Buses run from 5:40 a.m. to 8:30 p.m. preventing workers who work odd shifts from using the bus to commute to and from work. The map below displays the SunTran routes in the city.

MAP: SunTran Bus Routes (6)



SunTran routes cover much of the residential and business areas of the city, but because there are only 6 routes throughout the entire city, public transportation is still not a viable option for commuters, as evidenced by the 0.4 percent usage for people who use it to commute to work. In interactive map can be found at: www.suntranutah.com.

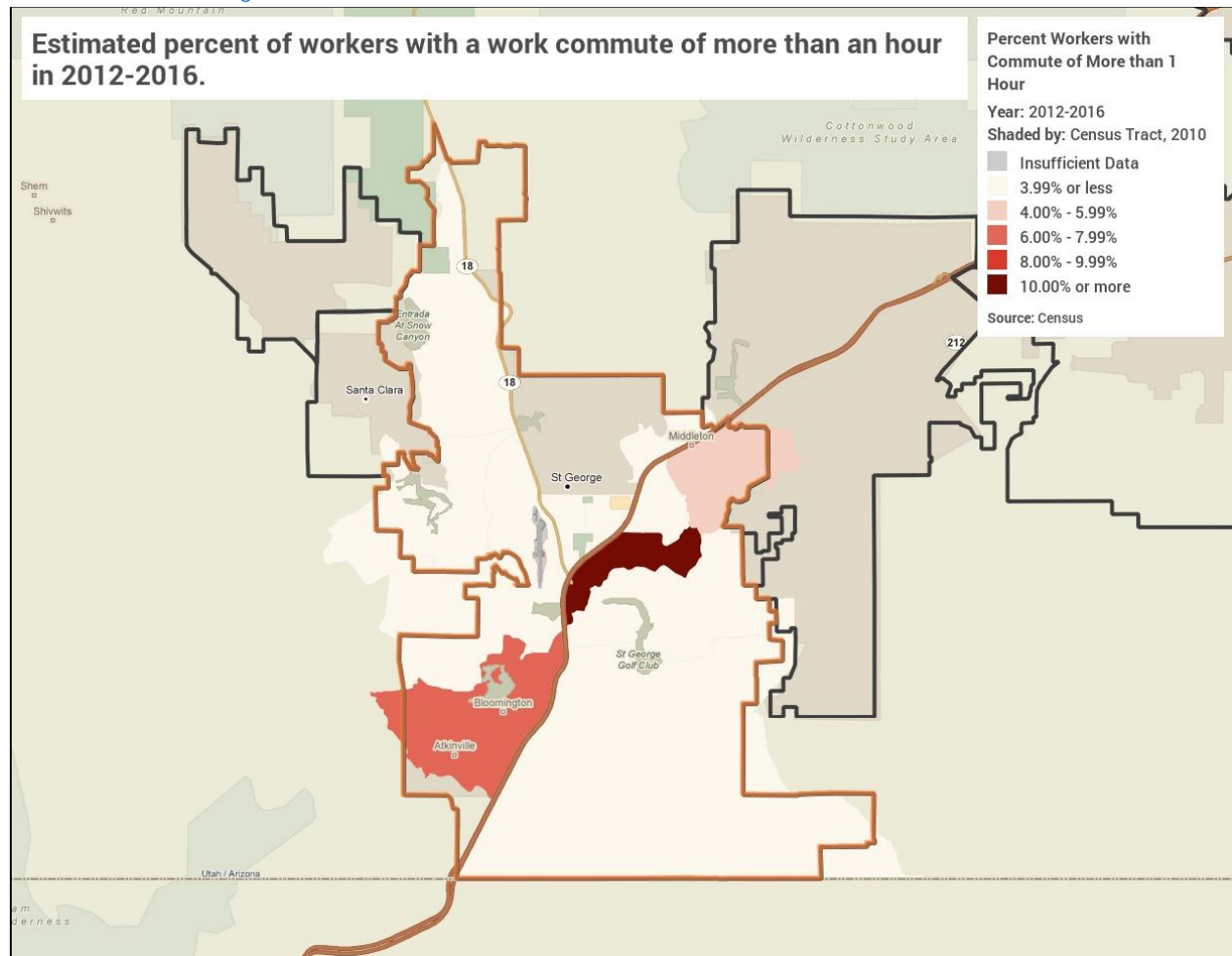
TABLE: Travel Time to Work

St. George	2000	2016	Percent Change
Workers 16 years and over who did not work at home	18,837	30,063	59.6%
Less than 10 minutes	30.1%	28.5%	-5.3%
10 to 19 minutes	52.8%	48.5%	-8.1%
20 to 29 minutes	8.8%	12.8%	45.5%
30 to 59 minutes	6.0%	7.4%	23.3%
60 or more minutes	2.4%	2.9%	20.8%
Mean travel time to work (minutes)	14.4	15.3	6.3%
Source: 2012-2016 American Community Survey 5-Yr Estimates (S0801)			

Travel time to work in St. George is steadily increasing. In 2000, 17.2 percent of workers commuted over 20 minutes. In 2016, that figure rose to 23.1 percent. The city has been able to handle the growth from 2000 to 2016, but the population growth estimates reported earlier demands the attention of thoughtful planning now. As the city becomes more densely populated, a more robust public transportation system will be key in managing the rapid growth.

The following series of maps shows travel data in St. George. The first map shows the percentage of the population who commutes more than one hour to work. The lightest shade means that less than 4 percent of the population must commute one hour or more. The darkest shade represents areas where 10 percent or more of the population commutes one hour or more. Gray shaded areas represent areas with insufficient data.

MAP: Commute Longer Than One Hour

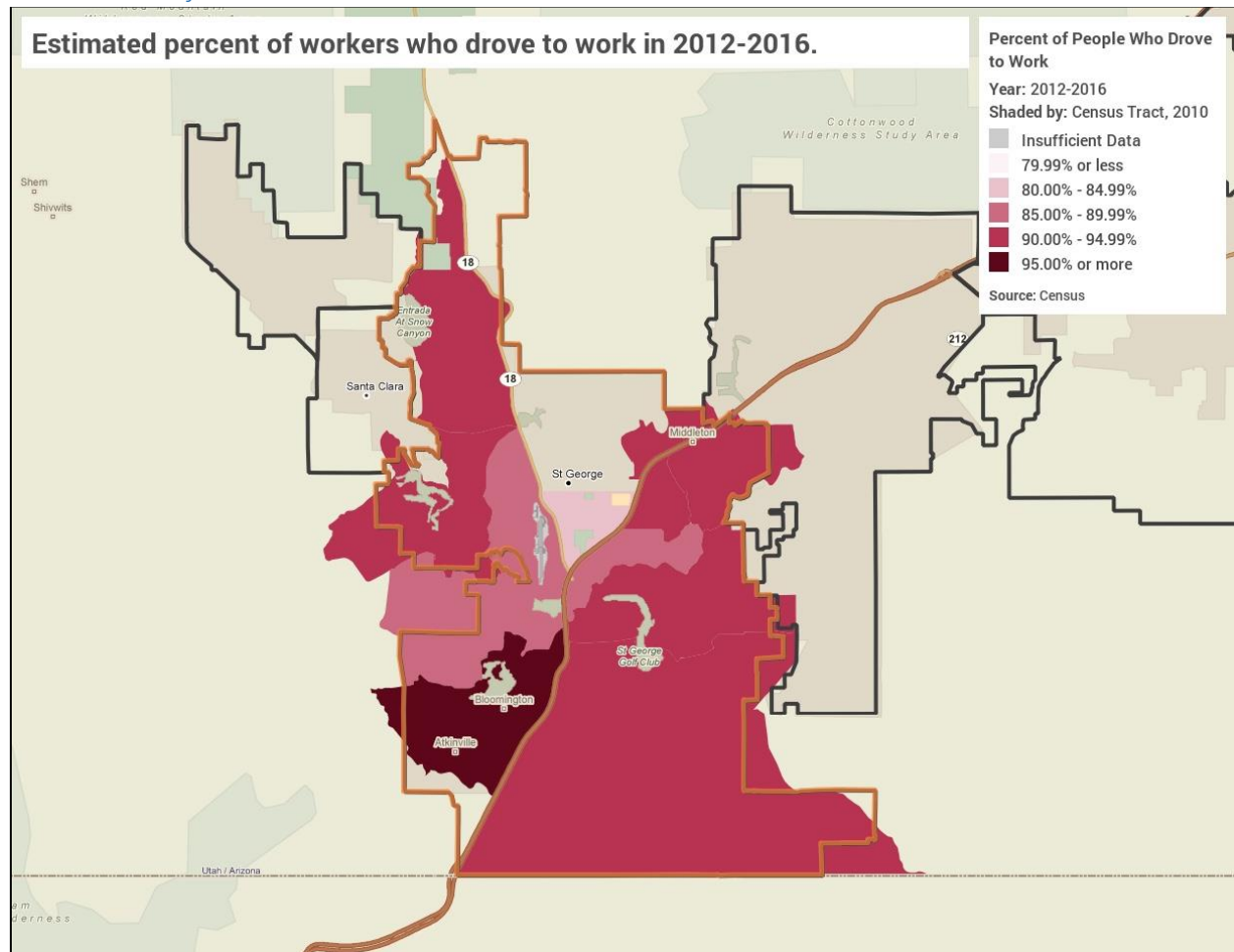


Source: 2012-2016 ACS via PolicyMap

In the central areas of the city, right along the I-15 corridor, workers in St. George took the most time to travel to work. It suggests workers in this area do not work where they reside. This also creates congestion for those traveling into the city for work.

According to the 2012-2016 ACS, 80 percent of the labor force in St. George drove alone using personal vehicles. This map shows the percent of the population that drives to work. Lighter shades indicate a lower concentration of people who drive alone to work; darker shades indicate a higher concentration.

MAP: Percent of Workers Who Drove to Work



Source: 2012-2016 ACS via PolicyMap

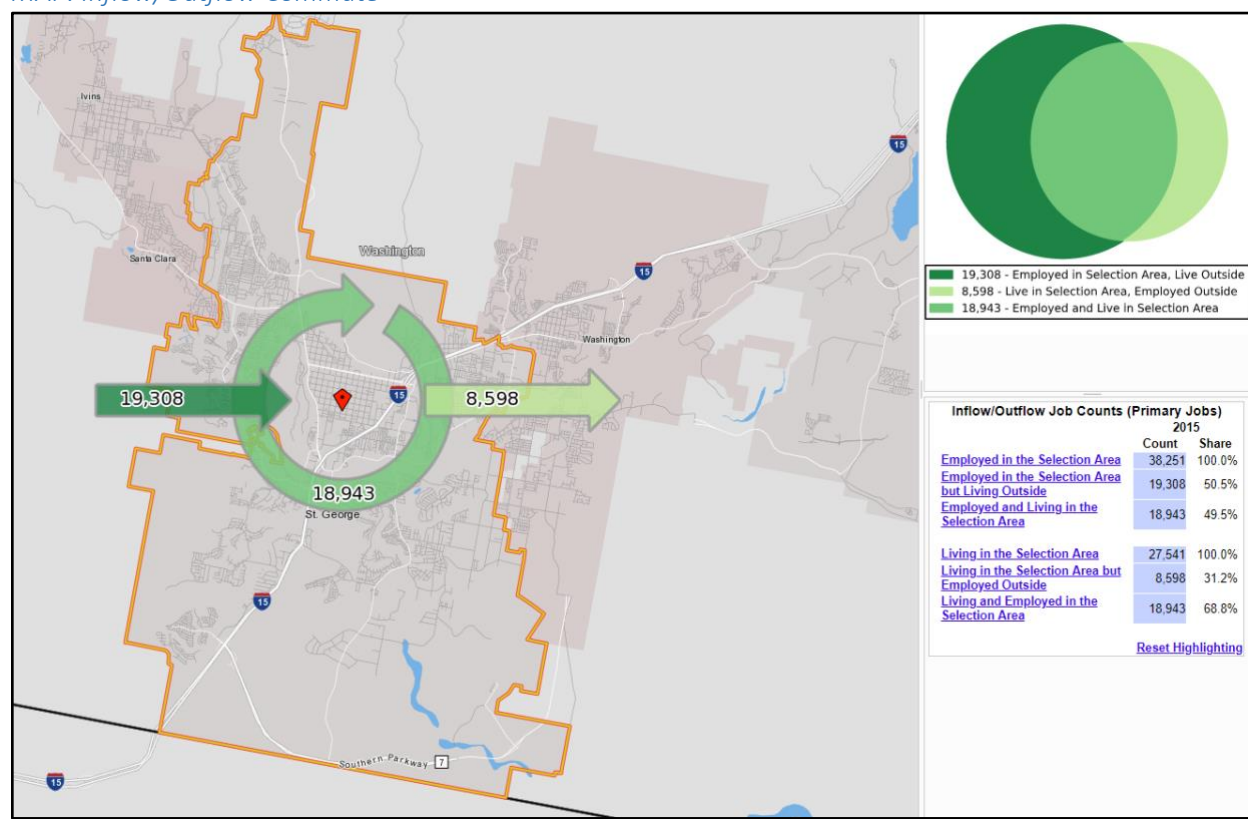
The southwest area of St. George has the highest percent of workers who drove to work in 2016. One explanation to this observation is that there are some residential areas in this tract, yet there is only one public transit route that is run by SunTran in this location.

In addition to analyzing St. George residents who commute, it is important to capture residents who work in St. George but do not live in the city. These individuals contribute significantly to traffic. There is an apparent disconnect between the availability of housing within the city. There are benefits for residents in living closer to their places of employment than further away. Reduced commute times can increase health, happiness, and productivity of employees while reducing wear and tear on public roads.

The following map shows that nearly 20,000 residents, or 50 percent of employed workers in the city, live outside of St. George. The most common home locations for residents commuting into the city are Washington (11.2%), Hurricane City (5%), Santa Clara (4.3%), Ivins (3.8%), and Cedar City (2.7%).

Additionally, nearly 9,000 residents are commuting to employment locations outside of the city. The most common cities of employment are Washington (5.1%), Hurricane (3.7%), and Salt Lake City (2.3%).

MAP: Inflow/Outflow Commute



Source: Longitudinal Employer-Household Dynamics (LEHD)

Veterans

As of the 2012-2016 ACS, there were 5,049 veterans living in the City of St. George – 8.7 percent of the population over 18 years old. Of those, 97 percent were White, approximately 95.7 percent were male and 4.3 percent were female. St. George veterans also have a median income significantly higher than non-veterans in the city. The city’s veterans are also more likely to have a bachelor’s degree or higher than non-veterans. Veterans experienced nearly half the unemployment rate at 3.1 percent compared to non-veterans in St. George at 5.4 percent.

TABLE: Veterans

St. George	Veterans	Non-veterans
Civilian population over 18 years old	5,049	52,704
Median Income	35,717	21,957
Labor force participation rate	71.3%	75.0%
Unemployment rate	3.1%	5.4%
Below poverty in the past 12 months	6.1%	14.8%
With any disability	39.1%	16.5%
Source: 2012-2016 American Community Survey 5-Year Estimates (S2101)		
Data Note: Median Income in the past 12 months		

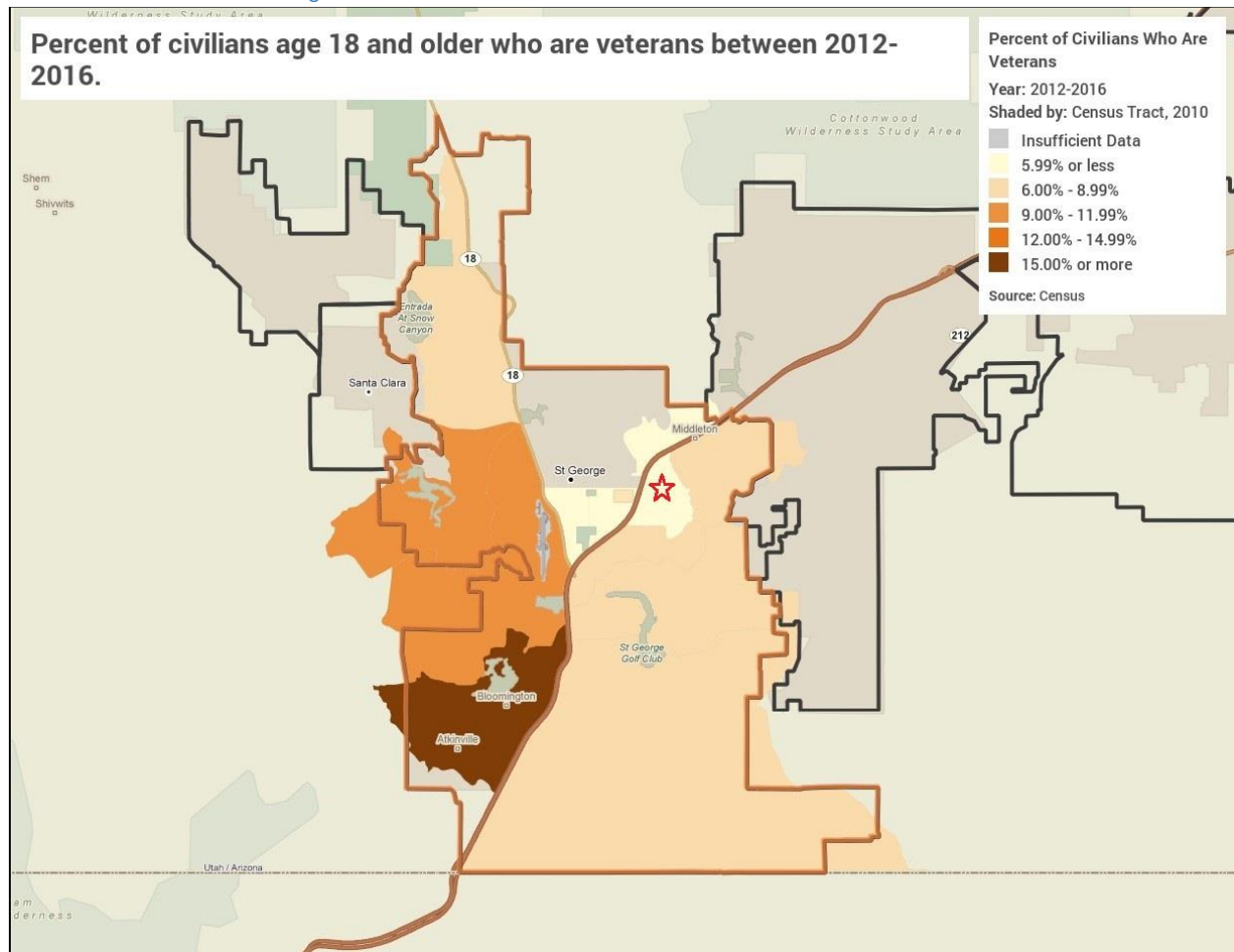
Economically, St. George’s veterans enjoyed more prosperity than non-veterans in the city, but a higher percentage of veterans are living with a disability than non-veterans. In 2016, veterans were more than twice as likely to have a disability than non-veterans in the city. Approximately 1,963 veterans in the City of St. George have a disability.

The table below compares the City of St. George's veterans to the state as a whole.

<i>TABLE: Veterans – State Comparison</i>		
Veterans	St. George	Utah (state)
Civilian population over 18 years old	5,049	129,748
Median Income	35,717	41,113
Labor force participation rate	71.3%	79.1%
Unemployment rate	3.1%	5.1%
Below poverty in the past 12 months	6.1%	6.1%
With any disability	39.1%	29.1%
Source: 2012-2016 American Community Survey 5-Year Estimates (S2101)		

While St. George veterans had a higher MHI, higher labor force participation rate, and lower unemployment rate than non-veterans in the city, the same cannot be said in comparison to other veterans in the state as a whole. St. George veterans compared unfavorably in many categories when compared to state veterans as a whole. The city veterans had lower incomes than the state's veteran population (over 18 and with an income) and lower labor participation rates. The unemployment rate for veterans in the city was lower than the state. The poverty level for veterans in the city and the state as a whole is the same at 6.1 percent. Finally, veterans in St. George also have a higher disability rate than the rest of the state.

MAP: Veterans in St. George



Source: 2012-2016 ACS via PolicyMap

While 8.7 percent of the population 18 years and older in St. George are veterans, the concentration number of veterans varied widely throughout the city. There were fewer veterans on the east side of St. George, with more concentrated on the west side of the city – especially along the southwestern side of I-15. The VA St. George Community Based Outpatient Clinic (referenced by the star in the map) is located at 230 North 1680 East, which is across town from the highest concentration of veterans in the city. Due to the way public transportation is organized in the city, it can take long commutes (sometimes up to 90 minutes) to travel from the tracts with a high veteran concentration to the VA clinic. Connecting Route 2 and Route 6 would help correct this issue.

Housing Profile

Housing Type & Size

According to the 2012-2016 American Community Survey estimates, 1-unit detached structures were the most prevalent type of housing in St. George, comprising 67.1 percent of the housing stock (22,529 units). The second most prevalent unit type in the city was 1-unit attached structures at 8.3 percent of the housing stock (2,786 units). Since the 2000 Census, there has been a slight shift in St. George in the type of housing units. The proportion of the housing stock made up of 1-unit, attached structures has been reduced by almost half and there have been increases in 1-unit, detached structures and smaller multi-unit structures (3 or 4 units and 5-9 units). There has also been a slight decrease in the relative presence of larger multi-unit structures (10-19 units and 20 or more units). The proportion of mobile homes has also been reduced significantly.

HUD defines a single-family structure as a structure with one to four units. HUD's definition of a multifamily structure is a structure with five or more housing units. Given HUD's definitions of single-family housing, the data shows that the most prevalent housing type in St. George was overwhelmingly single-family, with 83.2 percent of all housing units located in structures of one to four units.

TABLE: Residential Properties by Type & Number of Units				
	2000		2016	
Property Type	Number	%	Number	%
1-unit, detached structure	12,004	56.9%	22,529	67.1%
1-unit, attached structure	3,111	14.8%	2,786	8.3%
2 units	518	2.5%	853	2.5%
3 or 4 units	894	4.2%	1,774	5.3%
5-9 units	906	4.3%	1,732	5.2%
10-19 units	889	4.2%	1,005	3.0%
20 or more units	913	4.3%	1,430	4.3%
Mobile Home	1,703	8.1%	1,427	4.3%
Boat, RV, van, etc.	145	0.7%	24	0.1%
Total	21,083	100%	33,560	100%
Data Source: 2000 Census H030, 2012-2016 American Community Survey 5-Year Estimates (B25024)				

Housing Unit Size

According to the 2012-2016 ACS, three-bedroom units make up the largest portion of St. George's housing stock at 40.3 percent of all units. The second most prevalent housing size were 2-bedroom units at 24.2 percent of the city's housing stock. At 16.5 percent of the housing stock, 4-bedroom unit's account for the third largest housing size in St. George.

The table below compares unit sizes from 2000 to 2016. The bedroom count in housing units is increasing throughout the city. The proportion of homes with no bedrooms, 1-bedroom, 2-bedrooms, and 3-bedrooms has decreased while the proportion of homes with 4-bedrooms and 5 or more bedrooms has increased.

<i>TABLE: Housing Units by Size</i>				
	2000		2016	
Bedroom Count	Number	%	Number	%
No bedroom	424	2.0%	362	1.1%
1 bedroom	2,244	10.6%	2,521	7.5%
2 bedrooms	5,734	27.2%	8,131	24.2%
3 bedrooms	8,807	41.8%	13,539	40.3%
4 bedrooms	2,387	11.3%	5,533	16.5%
5 or more bedrooms	1,487	7.1%	3,474	10.4%
Total	21,083	100%	33,560	100%
Data Source: 2000 Census H041, 2012-2016 American Community Survey 5-Year Estimates (B25041)				

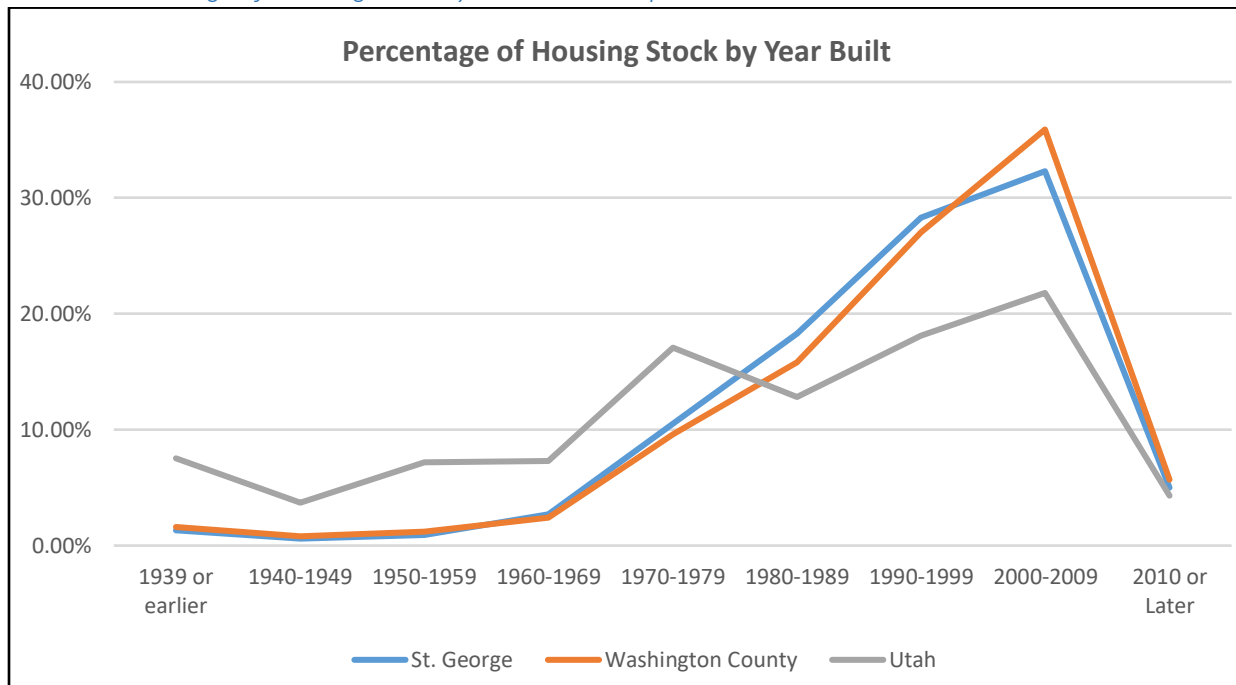
Housing Conditions

The table below provides data on the age of St George's housing stock by year cohort in comparison to Washington County and the state of Utah. The largest cohort in the city was units built between 2000 and 2009, comprising 32.3 percent of the housing stock (10,855 units). Washington County has a similar housing age demographic with 35.9 percent being built between 2000 and 2009. The state of Utah as a whole generally has older homes – the largest cohort is also homes built between 2000 and 2009, but only 21.8 percent of the homes fall in this range.

TABLE: Year Unit Built						
	St George		Washington County		Utah	
Range	Number	%	Number	%	Number	%
Built 2010 or Later	1,684	5.0	3,540	5.7	43,833	4.3
Built 2000 to 2009	10,855	32.3	22,430	35.9	223,737	21.8
Built 1990 to 1999	9,502	28.3	16,830	27.0	185,792	18.1
Built 1980 to 1989	6,146	18.3	9,837	15.8	131,506	12.8
Built 1970 to 1979	3,523	10.5	5,994	9.6	175,470	17.1
Built 1960 to 1969	916	2.7	1,493	2.4	74,459	7.3
Built 1950 to 1959	318	0.9	733	1.2	74,209	7.2
Built 1940 to 1949	187	0.6	524	0.8	37,805	3.7
Built 1939 or earlier	429	1.3	1,012	1.6	77,236	7.5
Total	33,560	100%	62,393	100%	1,024,047	100%
Data Source: 2012-2016 American Community Survey 5-Year Estimates (B25034)						

The chart below displays the data from the above table. The housing stock in St. George and Washington County was relatively small until the 1970s, at which point significant linear growth occurred until the housing crash in the late 2000s. The state as a whole has a more diverse housing stock with 25.7 percent of homes built before 1970.

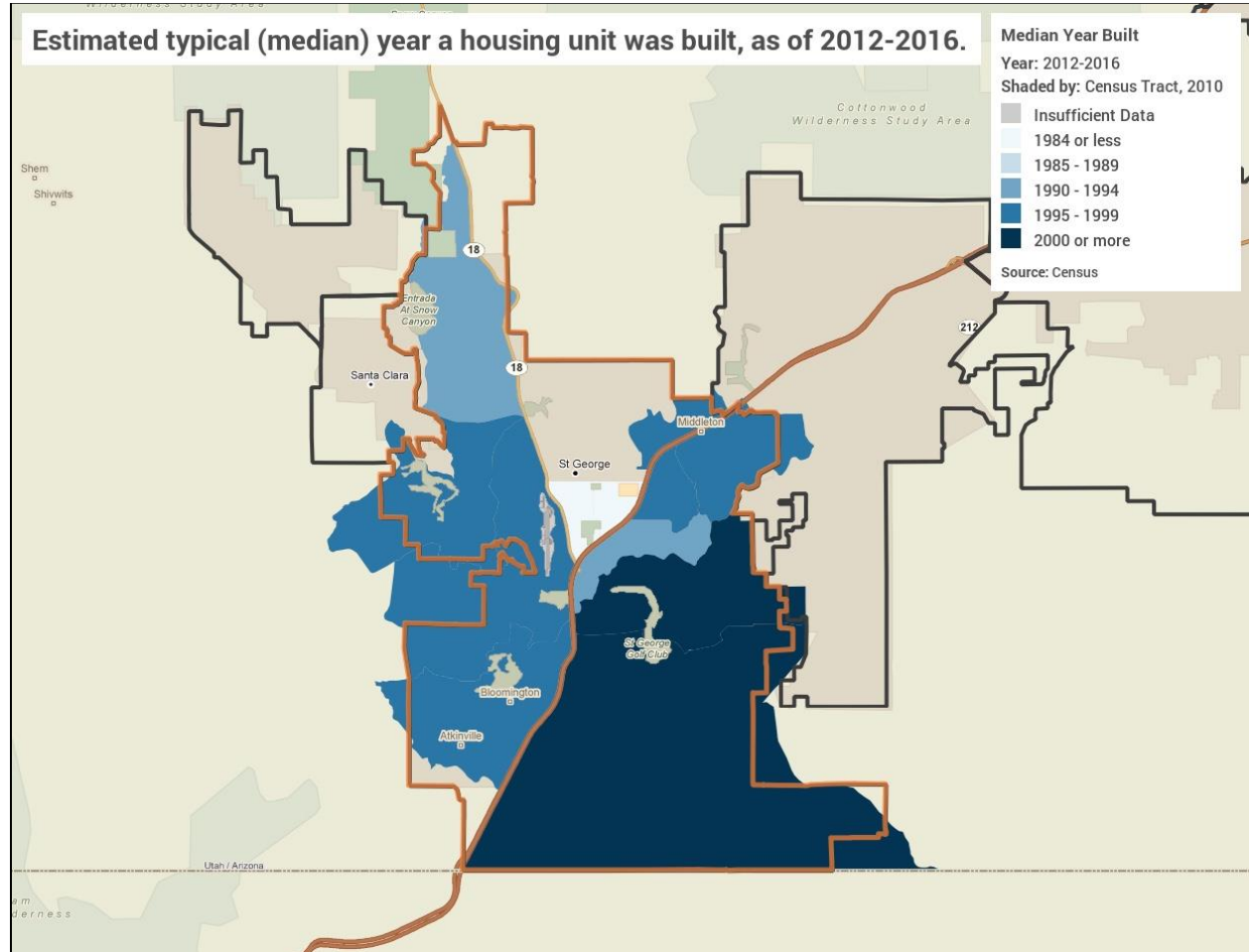
CHART: Percentage of Housing Stock by Year Built Comparison



Data Source: 2012-2016 American Community Survey 5-Year Estimates (B25034)

The following map shows the median year built for housing units by census tract in St. George, Utah.

MAP: Median Year Built



Source: 2012-2016 ACS via PolicyMap

As noted in the table above, there are fewer homes in St. George with housing older than 1990. However, older housing can be found in the central part of the city and newer housing is in the southern census tracts.

Housing Occupancy Characteristics

The table below compares renter and owner occupancy data across St. George between 2000 and 2016. Since the 2000 Census, the percentage of occupied housing units has decreased slightly in St. George. The total number of housing units increased by over 12,000 units, which is close to a 50 percent increase. The percentage of owner-occupied housing units decreased slightly from 67.9 percent to 65.7 percent.

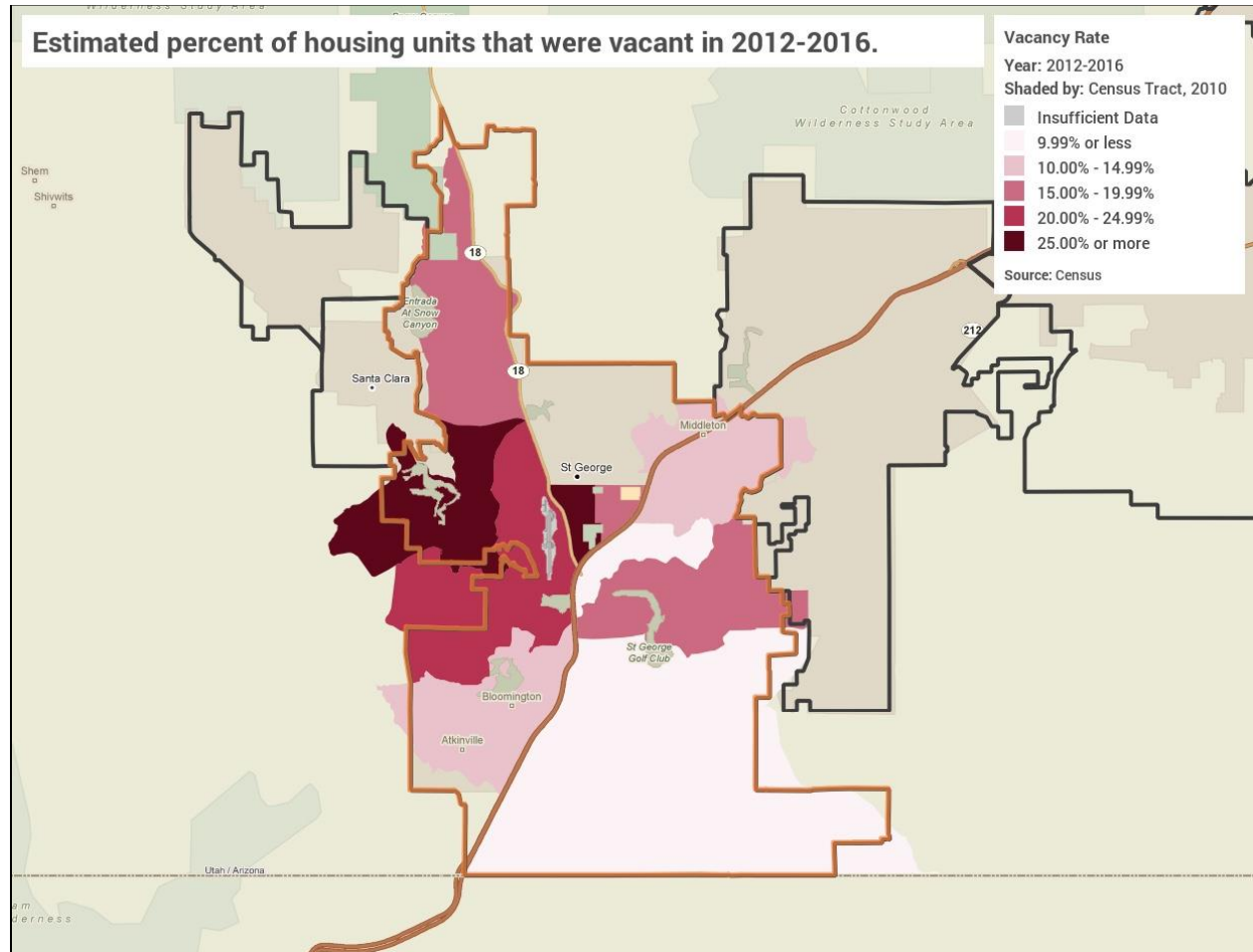
TABLE: Housing Occupancy				
	2000		2016	
	Number	%	Number	%
Total Housing Units	21,083	100%	33,560	100%
Occupied Housing Units	17,367	82.4%	26,939	80.3%
Owner Occupied Housing Units	11,795	67.9%	17,699	65.7%
Renter Occupied Housing Units	5,572	32.1%	9,240	34.3%
Data Source: Census 2000 (DP-1), 2012-2016 American Community Survey 5-Year Estimates (DP04)				

The following table shows the vacancy rates for renters and homeowners in both St. George and Utah. A property is considered vacant if no one is living in it at the time of enumeration and it is available for occupation (for example, it does not contain any structure that is damaged to a point where it would be deemed unfit for occupation). From 2000 to 2016, rental vacancy rates increased, and homeowner vacancy rates decreased very slightly in St. George. St. George has slightly higher vacancy rates than the state as a whole, 0.2 percent higher for homeowners and 1.7 percent higher for renters.

TABLE: Vacancy Rate				
	2000		2016	
	Homeowner Vacancy Rate	Rental Vacancy Rate	Homeowner Vacancy Rate	Rental Vacancy Rate
St George	3.7%	6.6%	1.7%	7.3%
Utah	2.1%	6.5%	1.5%	5.6%
Data Source: Census 2000 (DP-1), 2012-2016 American Community Survey 5-Year Estimates (DP04)				

The map below depicts the residential vacancy rates by census tract in St. George. The lightest shade signifies a vacancy rate under 10 percent, and the rate increases as the shade darkens. The southernmost census tract (southeast of I-15) has the lowest vacancy rate. This is also the census tract with the newest housing.

MAP: Vacancy

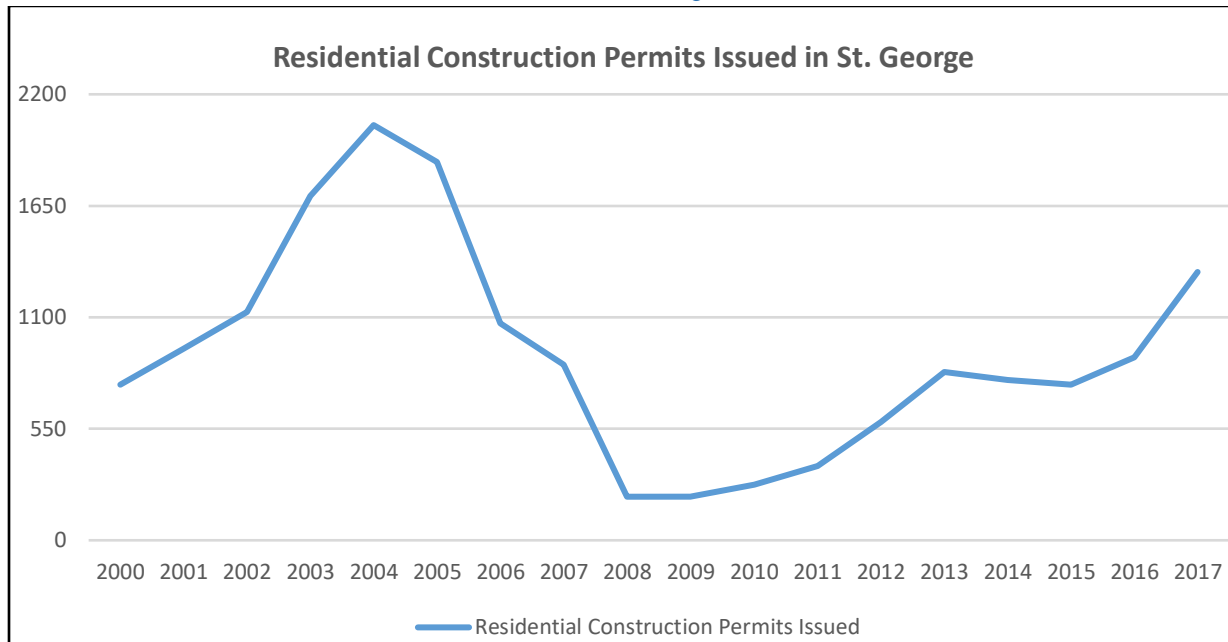


Source: 2012-2016 ACS via PolicyMap

Construction Activity

The line graphs on this and the following page depict perhaps the best representation of the collapse of the housing boom and recovery between 2004 and 2017 throughout St. George. This first graph displays the decline in the number of residential building permits issued each year between 2004 and 2008, then the beginning of a slow recovery starting in 2009.

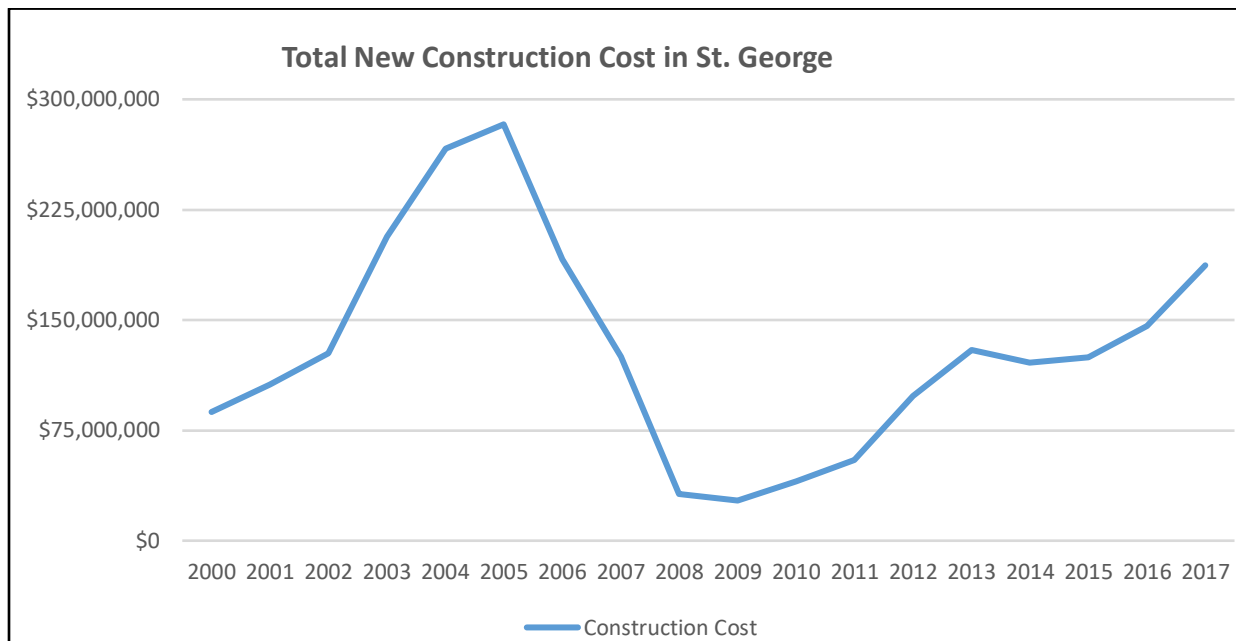
CHART: Residential Construction Permits Issued in St. George



Source: US Census Bureau

This second graph details the precipitous drop in the total valuation of new construction building permits each year during the same period. The reduction in construction cost mirrors the construction permits issued, but the drop is even more significant starting in 2005 and a slow recovery beginning in 2010.

CHART: Total New Construction Cost



Source: US Census Bureau

Housing Market and Demand

The table below further demonstrates the ongoing negative impact of the 2007 housing market collapse on annual housing sales in St. George. Starting in 2007 there was a significant decrease in housing sales that is still being felt. Total sales in 2007 were 2,504, but in 2016 the total sales were less than half of that with 1,107. The median sales price has also dropped from a high in 2007 of \$241,395 to \$166,606 in 2016 (Though there were short signs of increasing median sales price from 2012-2015).

TABLE: Annual Housing Sales in St. George

	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
Number	2,504	1,893	2,185	1,749	1,503	1,244	1,341	1,396	1,373	1,107
Median Sale Price	\$241,395	\$193,750	\$173,630	\$145,780	\$144,431	\$168,147	\$187,700	\$188,030	\$207,150	\$166,606
Data Source: Boxwood Means Inc. via Policy Map										

Housing Costs

The following section examines data on housing costs for owners and renters across St. George. The data tables provide a comparison between the 2000 Census and the 2012-2016 American Community Survey 5 – Year Estimates.³ Housing costs across St. George increased significantly between 2000 and 2016. Median home values for owner-occupied homes increased by 55.9 percent and the median rent increased by 56.4 percent across St. George, even with the valuation decreases caused by the 2007 housing crash.

As detailed above, new unit production is only a fraction of what it once was and thus the relatively fewer units coming to market each year have added to the upward pricing for both owner and renter options.

TABLE: Change in Cost of Housing			
	2000	2016	Percent Change 2000-2016
Median Home Value	\$143,200	\$223,200	55.9%
Median Gross Rent	\$591	\$924	56.4%
Data Source: Census 2000 (DP-1), 2012-2016 American Community Survey 5-Year Estimates (DP04)			

The following table compares 2000 and 2016 home value cohort data for the city. In St. George the general trend over time is that lower price cohorts are accounting for smaller portions of the housing stock, while higher value cohorts are accounting for a larger share. The one exception to this is extremely low-cost homes (less than \$50,000); there has been significant growth in raw numbers as well as the percentage of the housing stock for this cohort.

³ There are several instances where the methods in which the data were collected and/or reported changed between the Census and ACS. In each case, a note is provided to clarify the data sets being presented.

TABLE: Median Home Value for Owner-Occupied Units

	2000		2016	
	Number	Percentage	Number	Percentage
Less than \$50,000	61	0.6%	708	4.0%
\$50,000 to \$99,999	1,718	17.5%	961	5.4%
\$100,000 to \$149,999	3,588	36.6%	2,308	13.0%
\$150,000 to \$199,999	2,296	23.4%	3,475	19.6%
\$200,000 to \$299,999	1,473	15.0%	5,324	30.1%
\$300,000 to \$499,999	518	5.3%	3,732	21.1%
\$500,000 to \$999,999	137	1.4%	1,078	6.1%
\$1,000,000 or more	20	0.2%	113	0.6%
Total Units/Median Value	9,811	\$143,200	17,699	\$223,200
Data Source: Census 2000 (DP-1), 2012-2016 American Community Survey 5-Year Estimates (DP04)				

The following line graph visually displays the shifts in median home value cohorts in St George from 2000 to 2016. The median home value has shifted considerably in this time period. In 2000 the largest price cohort was \$100,000-\$149,999 and in 2016 the largest cohort was \$200,000-\$299,999. The overall median home value increased by \$80,000, and the number of \$1 million homes increased by nearly over 6 times, from 2000 to 2016.

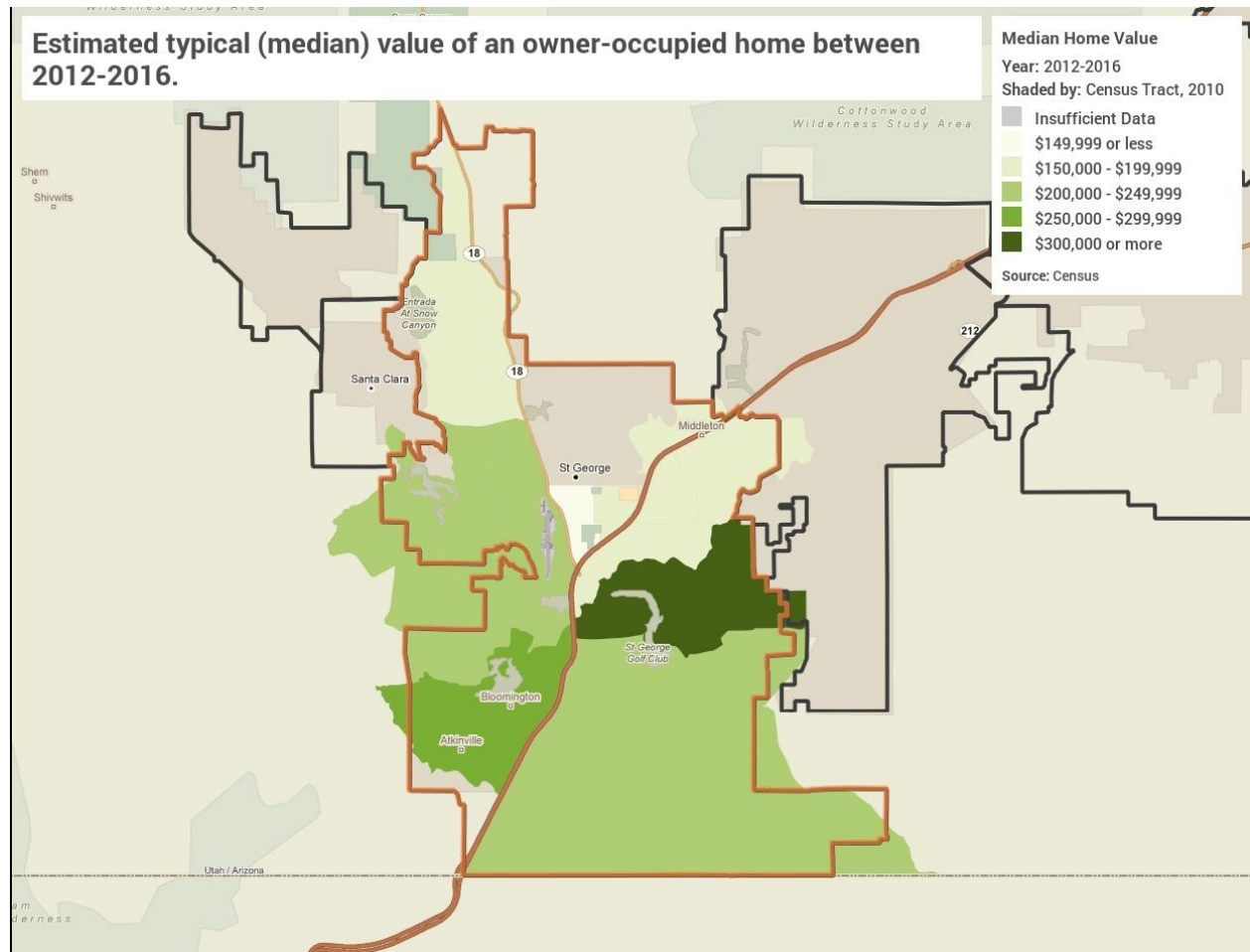
CHART: Median Home Value Per Price Cohort (%)



Source: Census 2000 (DP-1), 2012-2016 American Community Survey 5-Year Estimates (DP04)

The following map displays the median home value across St. George. The lightest green shaded areas are where median home values were less than \$150,000, and the shade darkens as the home value increases. The highest value homes are concentrated in the eastern portion of the city and the lowest value homes are in the downtown and northern areas.

MAP: Median Home Value



Source: 2012-2016 ACS via PolicyMap

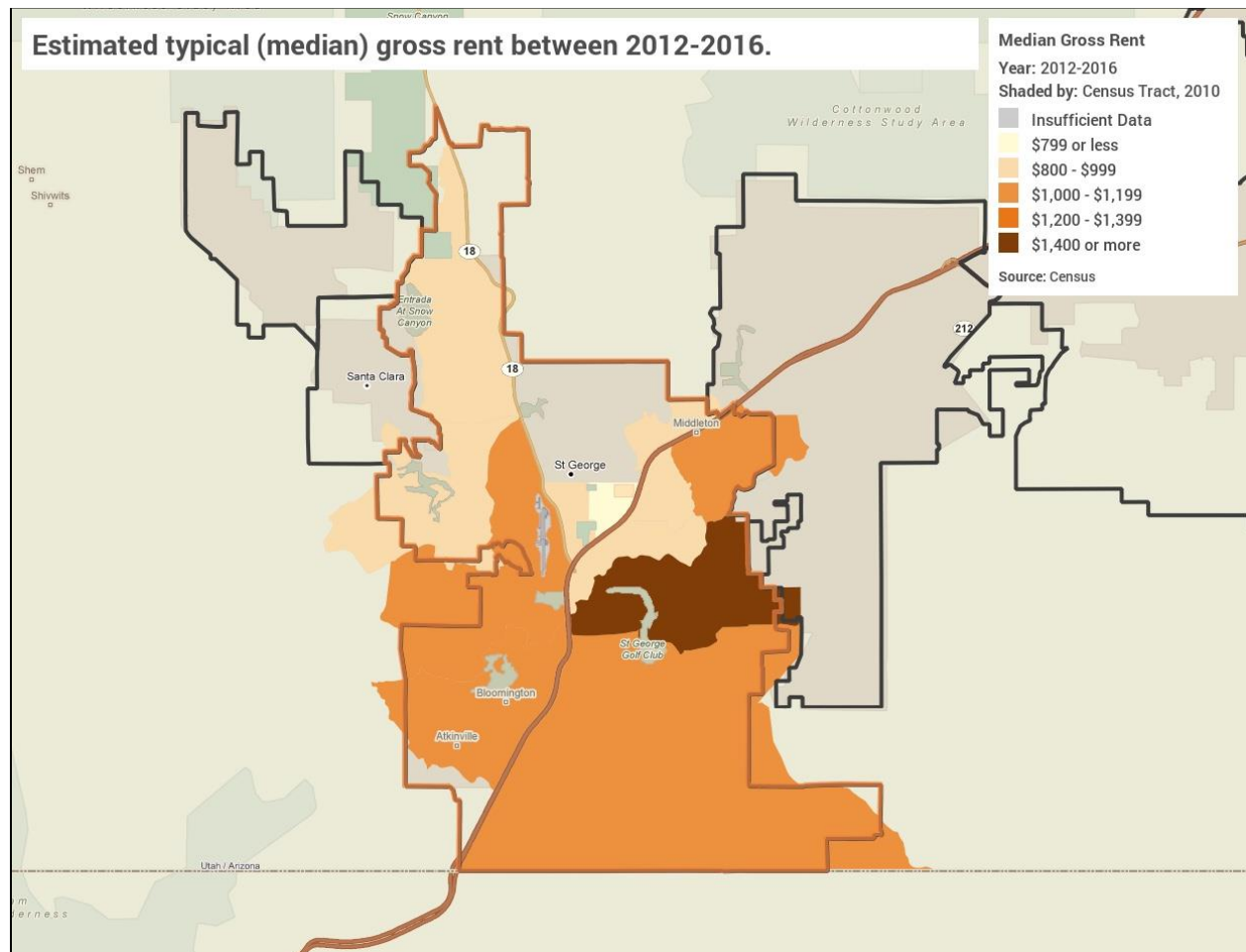
Median Rent

The table below compares 2000 and 2016 rent cohort data for St. George. The general trend over time is that there are fewer units available in the lower rent cohorts and increasing numbers of units available in the higher rent cohorts. This is to be expected in light of the nearly 50 percent growth in rents since 2000.

TABLE: Median Rent				
	2000		2016	
	Number	Percentage	Number	Percentage
No rent paid	283	N/A	330	N/A
Less than \$500	1,628	29.3%	559	6.3%
\$500-999	3,234	58.1%	4,724	53.0%
\$1,000-\$1,499	347	6.2%	2,491	28.0%
\$1,500 or more	72	1.3%	1136	12.8%
Total Units/Median Rent	5,564	\$591	8,910	\$924
Data Source: Census 2000 (DP-4), 2012-2016 American Community Survey 5-Year Estimates (DP04) Note: Median Rent is calculated based solely on those renters actually paying rent.				

The following map displays the distribution of median rent throughout St. George. While the median rent in the city is \$924 there is some variety among census tracts. The lightest orange shaded areas represent where median rent was less than \$800, the shade darkens as the median rent increases. The highest median rents paid are for housing in the central eastern portion of the city.

MAP: Median Rent



Source: 2012-2016 ACS via PolicyMap

Housing Affordability

By HUD's definition, households paying in excess of 30 percent of their monthly household income towards housing costs (renter or owner) are said to be cost burdened. The tables below detail data on owner costs as percentage of household income for homeowners with a mortgage, homeowners without a mortgage, and renter costs as a percentage of income.

Over 35 percent of homeowners with a mortgage are cost-burdened in St. George. Homeowners without a mortgage are significantly better off. Only 8.7 percent of homeowners without a mortgage are cost burdened. Renters face the highest rate of cost burden at 52.9 percent.

<i>TABLE: Selected Monthly Costs of Home Owners with Mortgage</i>		
	Number	Percentage
Less than 20%	3,899	35.6%
20 to 24.9%	1,611	14.7%
25 to 29.9%	1,496	13.7%
30 to 34.9%	1,011	9.2%
35% or more	2,927	26.7%
Not Computed	12	--
Data Source: 2012-2016 American Community Survey 5-Year Estimates (DP04)		

TABLE: Selected Monthly Costs of Home Owners without a Mortgage

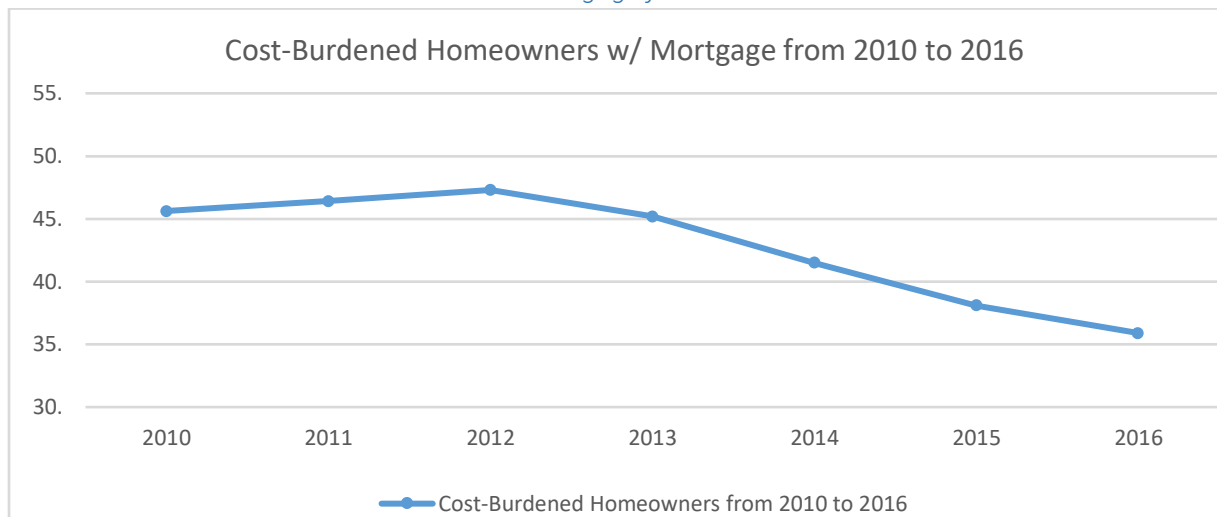
	Number	Percentage
Less than 10%	3,625	54.4%
10 to 14.9%	1,063	15.9%
15 to 19.9%	628	9.4%
20 to 24.9%	547	8.2%
25 to 29.9%	229	3.4%
30 to 34.9%	145	2.2%
35% or more	431	6.5%
Not Commuted	75	--
Data Source: 2012-2016 American Community Survey 5-Year Estimates (DP04)		

TABLE: Selected Monthly Costs of Renters

	Number	Percentage
Less than 15%	979	11.2%
15 to 19.9%	1,125	12.9%
20 to 24.9%	1,158	13.2%
25 to 29.9%	853	9.8%
30 to 34.9%	764	8.7%
35% or more	3,864	44.2%
Not Commuted	497	--
Data Source: 2012-2016 American Community Survey 5-Year Estimates (DP04)		

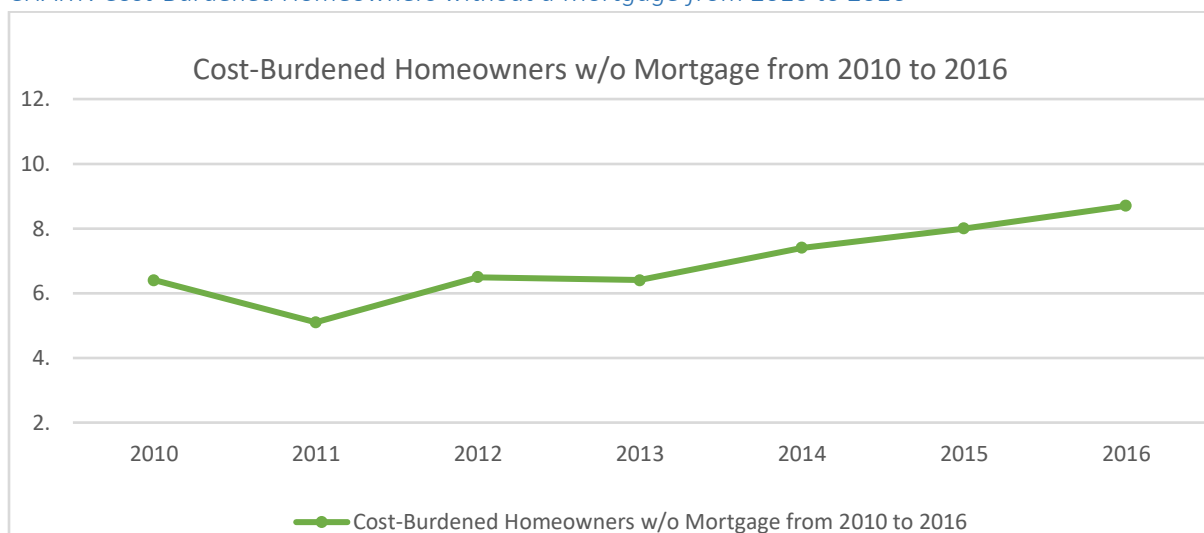
In the following charts, show the change in households which were cost burdened from 2010 to 2016. Cost burdened homeowners with a mortgage saw a decline in households with cost burden, however homeowners without a mortgage and renters saw an increase in cost burden since 2010. Since 2012, the rate of cost burdened renters has become relatively stable at approximately 53 percent.

CHART: Cost-Burdened Homeowners with a Mortgage from 2010 to 2016



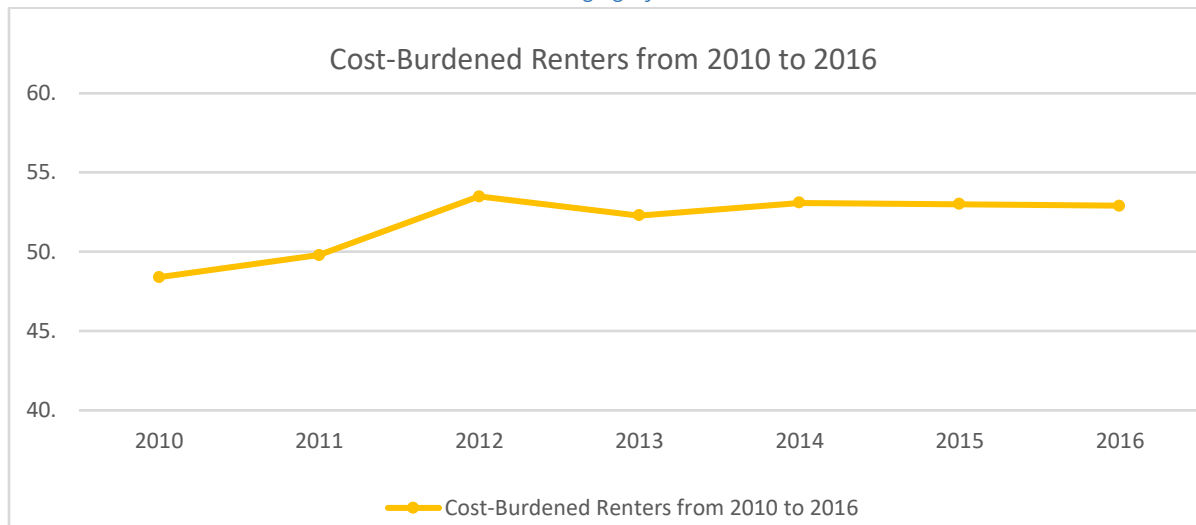
Source: 2006-2010 to 2012-2016 American Community Survey 5-Year Estimates

CHART: Cost-Burdened Homeowners without a Mortgage from 2010 to 2016



Source: 2006-2010 to 2012-2016 American Community Survey 5-Year Estimates

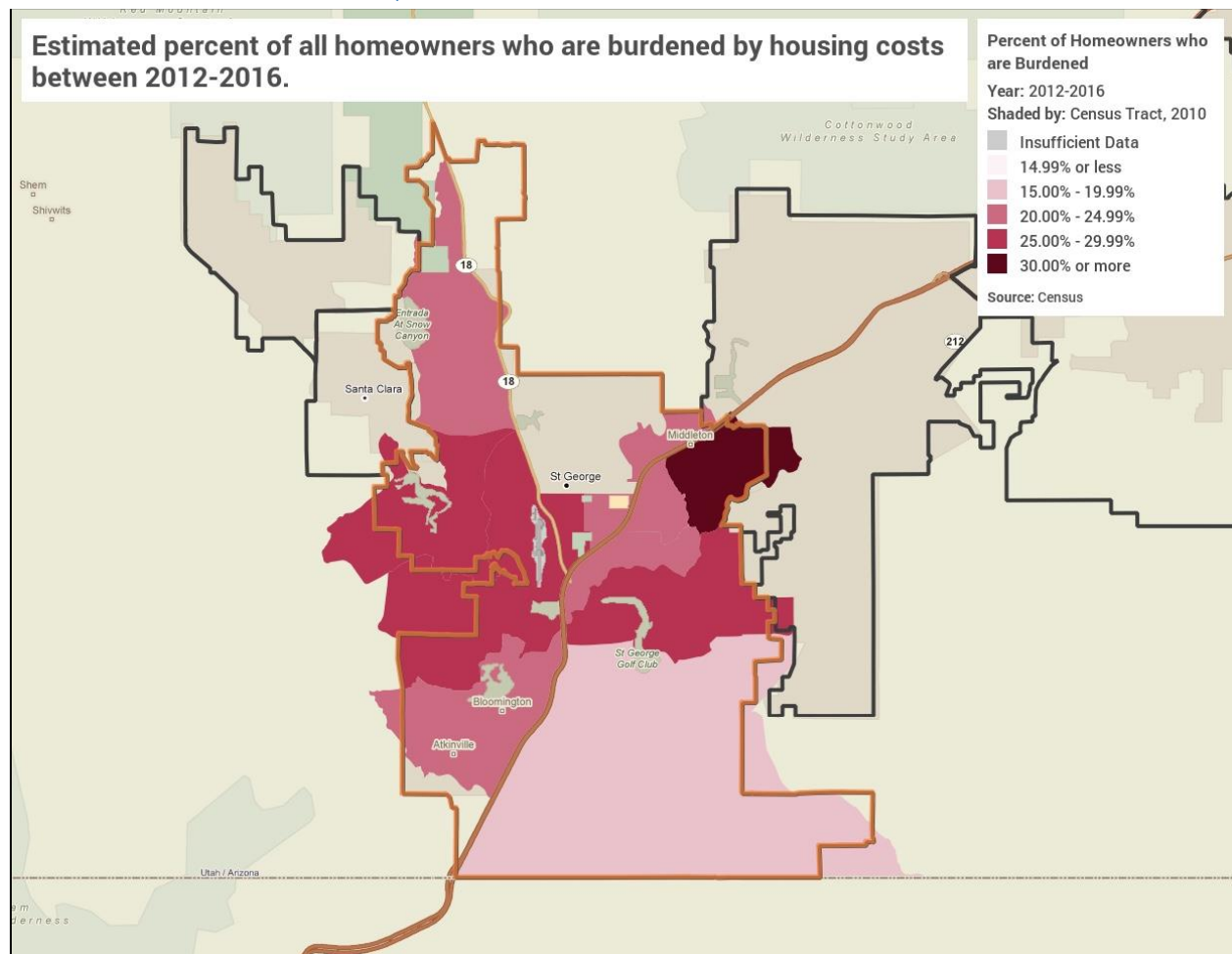
CHART: Cost-Burdened Homeowners with a Mortgage from 2010 to 2016



Source: 2006-2010 to 2012-2016 American Community Survey 5-Year Estimates

The following four maps depict concentrations of cost burdened households. The first two show owner-occupied households (entire population and those 65 years or older) and the second pair of maps shows renter-occupied households (entire population and those 65 years or older).

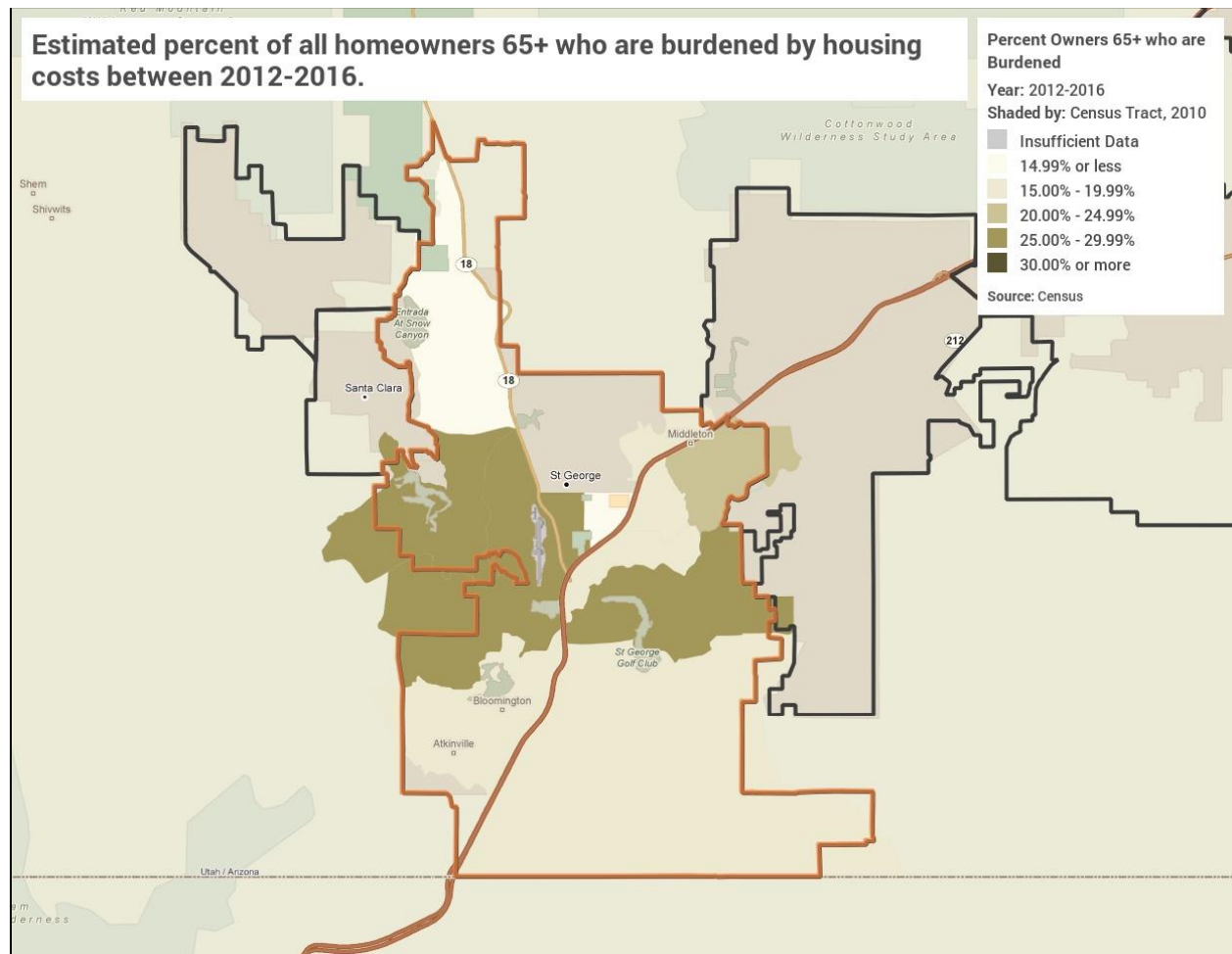
MAP: Cost Burdened Owner-Occupied Households



Source: 2012-2016 ACS via PolicyMap

There is a clear difference in cost burdened concentration across the city. The southern portion of the city east of I-15, which also boasts higher rents and median home values, has the fewest cost burdened homeowners. In the central city tracts and also in the northeast tract nearby I-15, cost burden among homeowners is higher.

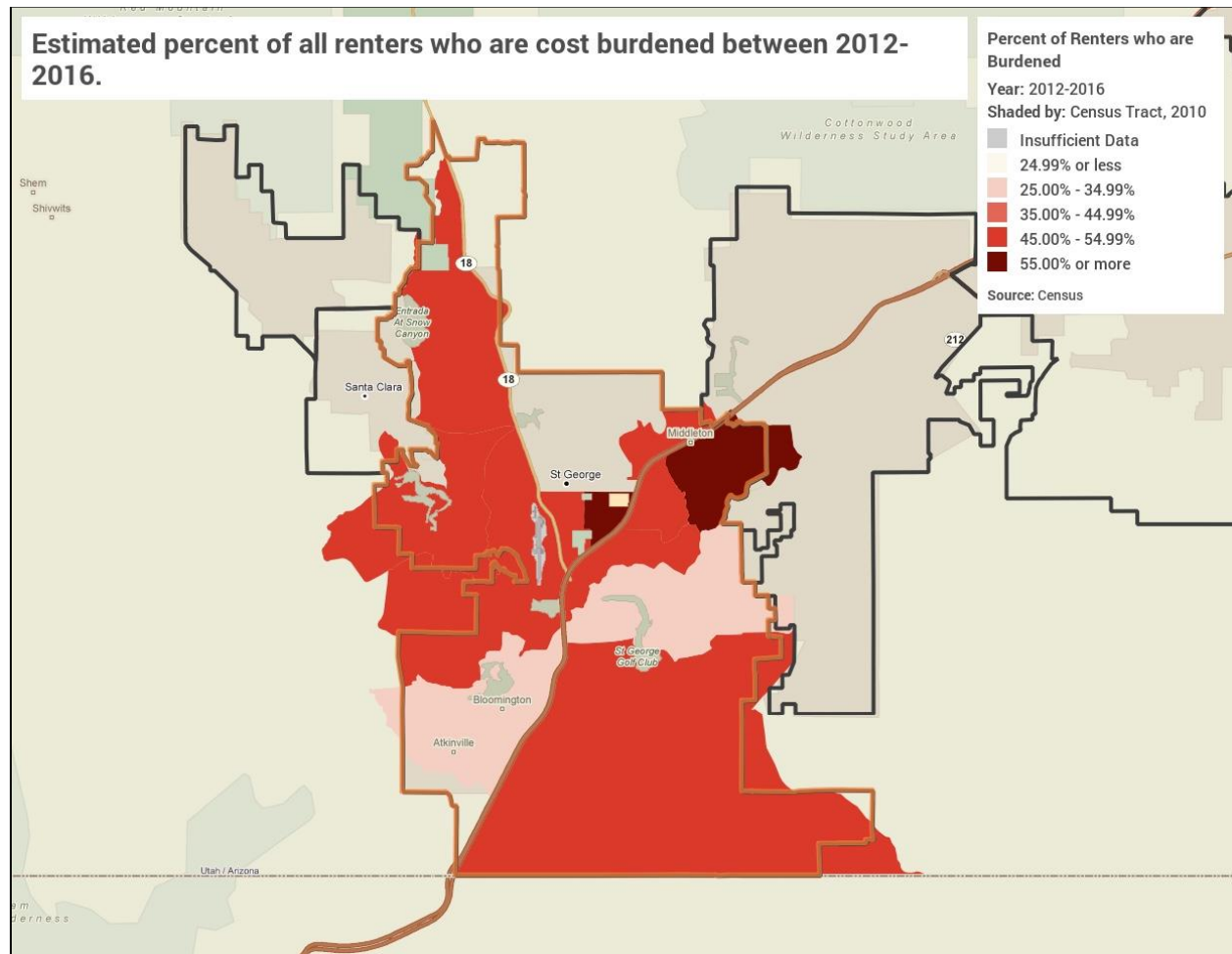
MAP: Cost Burdened Owner-Occupied Households 65 Years and Older



Source: 2012-2016 ACS via PolicyMap

The highest concentration of cost burdened homeowners aged 65 and older is in the central tracts stretching from west to east across the city. The areas with the lowest cost burden are in eastern downtown just north of I-15 and in the northwest tip of St. George.

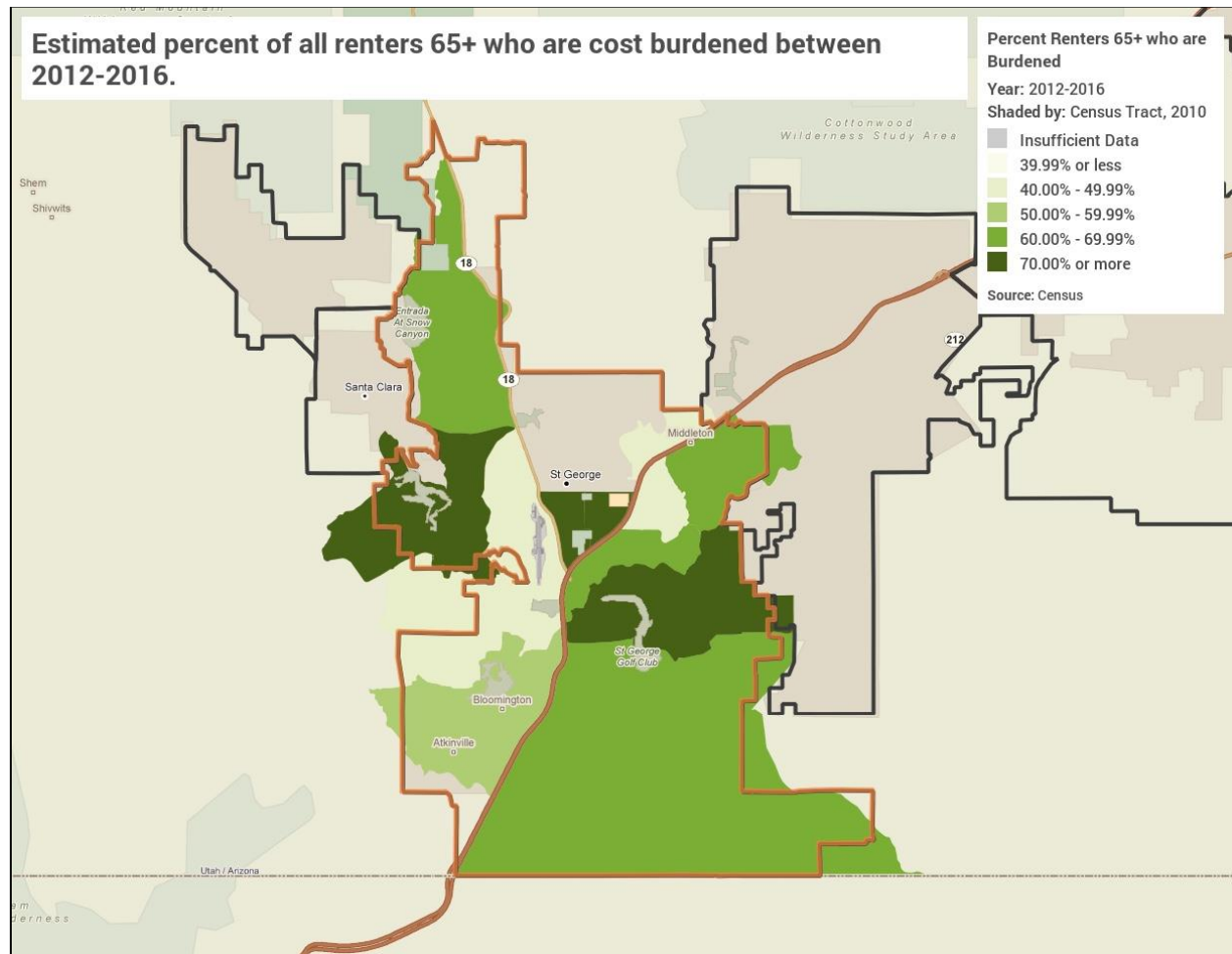
MAP: Cost Burdened Renter Households



Source: 2012-2016 ACS via PolicyMap

Renters in the City of St. George are significantly more likely to be cost burdened than homeowners. The highest concentration of cost burdened renters (55% or more) is in the easternmost tip of the city, along I-15 and in the eastern half of downtown.

MAP: Cost Burdened Renter Households 65 Years and Older



Source: 2012-2016 ACS via PolicyMap

Cost burdened renters aged 65 and over are heavily concentrated in the downtown, central west, and central east census tracts. In those areas, 70 percent or more of renters aged 65 and over are cost burdened.

Lending Practices

An analysis of lending practices is possible through an examination of data gathered from lending institutions in compliance with the Home Mortgage Disclosure Act (HMDA). The HMDA was enacted by Congress in 1975 and is implemented by the Federal Reserve Board as Regulation C. The intent of the Act is to provide the public with information related to financial institution lending practices and to aid public officials in targeting public capital investments to attract additional private sector investments.

Since enactment of the HMDA in 1975, lending institutions have been required to collect and publicly disclose data regarding applicants including: location of the loan (by Census tract, County, and MSA); income, race and gender of the borrower; the number and dollar amount of each loan; property type; loan type; loan purpose; whether the property is owner-occupied; action taken for each application; and, if the application was denied, the reason(s) for denial. Property types examined include one-to-four family units, manufactured housing and multi-family developments.

HMDA data is a useful tool in accessing lending practices and trends within a jurisdiction. While many financial institutions are required to report loan activities, it is important to note that not all institutions are required to participate. Depository lending institutions – banks, credit unions, and savings associations – must file under HMDA if they hold assets exceeding the coverage threshold set annually by the Federal Reserve Board, have a home or branch office in one or more metropolitan statistical areas (MSA), originated at least one home purchase or refinancing loan on a one-to-four family dwelling in the preceding calendar year. Such institutions must also file if they meet any one of the following three conditions: is a federally insured or regulated institution; originates a mortgage loan that is insured, guaranteed, or supplemented by a federal agency; or originates a loan intended for sale to Fannie Mae or Freddie Mac. For-profit, non-depository institutions (such as mortgage companies) must file HMDA data if: their value of home purchase or refinancing loans exceeds 10 percent or more of their total loan originations or equals or exceeds \$25 million; they either maintain a home or branch office in one or more MSAs or in a given year execute five or more home purchase, home refinancing, or home improvement loan applications, originations, or loan purchases for properties located in MSAs; or they hold assets exceeding \$10 million or have executed more than 100 home purchase or refinancing loan originations in the preceding calendar year.

It is recommended that the analysis of HMDA data be tempered by the knowledge that no one characteristic can be considered in isolation, but must be considered in light of other factors. For instance, while it is possible to develop conclusions simply on the basis of race data, it is more

accurate when all possible factors are considered, particularly in relation to loan denials and loan pricing. According to the FFIEC, “with few exceptions, controlling for borrower-related factors reduces the differences among racial and ethnic groups.” Borrower-related factors include income, loan amount, lender, and other relevant information included in the HMDA data. Further, the FFIEC cautions that the information in the HMDA data, even when controlled for borrower-related factors and the lender, “is insufficient to account fully for racial or ethnic differences in the incidence of higher-priced lending.” The FFIEC suggests that a more thorough analysis of the differences may require additional details from sources other than HMDA about factors including the specific credit circumstances of each borrower, the specific loan products that they are seeking, and the business practices of the institutions that they approach for credit.

The following analysis is provided for the City of St. George, summarizing 2017 HMDA data (the most recent year for which data are available), and data between 2007 and 2017 where applicable. Where specific details are included in the HMDA records, a summary is provided below for loan denials including information regarding the purpose of the loan application, race/ethnicity of the applicant and the primary reason for denial. For the purposes of analysis, this report will focus only on the information available and will not make assumptions regarding data that is not available or was not provided as part of the mortgage application or in the HMDA reporting process.

2017 City Overview

In 2017, there were just nearly 9,000 applications for loans to purchase, refinance or make improvements to single family homes in St. George. Of those applications, nearly 5,000 or 55 percent were approved and originated. Of the remaining 4,015 applications approximately 720 or 8 percent of all applications were denied for reasons identified below. It is important to note that financial institutions are not required to report reasons for loan denials, although many do so voluntarily. Also, while many loan applications are denied for more than one reason, HMDA data reflects only the primary reason for the denial of each loan. The balance of the 3,300 applications, that were not originated or denied, were closed for one reason or another including a) the loan was approved but not accepted by the borrower, b) the application was closed because of incomplete information or inactivity by the borrower or c) in many instances the application may have been withdrawn by the applicant.

TABLE: Disposition of Application by Loan Type and Purpose, Single Family Homes (excluding manufactured homes) in 2017

	Loan Type	Home Purchase	Refinance	Home Improvement
Total Applications				
	Conventional	3,770	2,376	364
	FHA	1,225	455	27
	VA	393	324	21
	FSA/RHS	23	7	0
Loans Originated				
	Conventional	2,368	1,174	230
	FHA	651	180	8
	VA	190	140	14
	FSA/RHS	12	3	0
Loans Approved but not accepted				
	Conventional	66	58	10
	FHA	15	9	0
	VA	3	10	1
	FSA/RHS	1	0	0
Applications Denied				
	Conventional	180	313	46
	FHA	50	59	10
	VA	26	29	2
	FSA/RHS	1	1	0
Applications Withdrawn				
	Conventional	372	349	49
	FHA	88	54	7
	VA	46	56	2
	FSA/RHS	2	1	0

Files Closed for Incompleteness				
	Conventional	88	136	13
	FHA	29	25	0
	VA	14	30	0
	FSA/RHS	1	1	0
Source: 2017 HMDA				

Of the home purchase loans for single-family homes that were originated in 2017, (3,221 loans originated, or nearly two-thirds of the city's total) approximately 74 percent of these originations were provided by conventional lenders. The remaining quarter of home purchase originations were provided by federally backed sources including the FHA, FSA/RHS, and VA. The VA had an application/approval ratio of 47 percent, while conventional lenders and FHA home purchase loan applications originated at rates of 58 percent and 49 percent respectively.

A further examination of the 717 denials indicates that 402 or 56 percent of all denials were for applicants seeking to refinance existing mortgages for owner-occupied, primary residences. The number one reason for denial of refinance applications was debt-to-income ratio (28% of refi. denials) followed by incomplete credit applications (19% of refi. denials). The third most common refinance denial reason was lack of collateral at 16 percent. Typically, homeowners seeking to refinance their existing home mortgage are able to use their home as collateral. When the denial reason given for a refinance is a lack of collateral, this would indicate the home is worth less than the existing mortgage and therefore refinancing is not an option – these homes are commonly referred to as “under-water” or the borrowers are “upside-down” in their mortgage.

Application Denials and Race/Ethnicity in 2017

Considering that over 92 percent of all 2017 applications within St. George were from non-Hispanic Whites (hereafter “Whites”), an analysis of mortgage lending outcomes by race is limited. Due to their representation of only 0.3 percent of all 2017 applications in St. George, Black or African American applicants have been excluded from the following analysis. However, while the sample size for Hispanics is also small, they represented 5 percent of all 2017 applications within St. George, allowing for basic comparisons by ethnicity.

The percentage of loan application denials for traditional home purchase loans for one-to-four family housing in St. George varies among Whites and Hispanics. Hispanics were more likely to

be denied for conventional single-family home purchases, at 8 percent, than Whites, at 5 percent, as of 2017.

Additionally, a closer look at home purchase denial rates by ethnicity and income group within St. George, shown below, demonstrates that as of 2017, high-income Hispanics (having greater than 120 percent of Area Median Income) were as likely to be denied for a single-family home purchase as low-income Whites (having 80 percent or less of Area Median Income), both at 7 percent. Low-income Hispanics were denied at a rate of 8 percent, higher than the 7 percent of low-income Whites. The gap between the low-income and high-income denial rates within each group was slightly higher for Hispanics (2%) than Whites (1%).

CHART: Single Family Home Purchase Denial Rate, St. George



Source: 2017 HMDA

Upon a review of denial reasons for conventional loan products, approximately one-third of Whites were denied because of debt-to-income ratio, slightly higher than the 29 percent for federally supported loan products. Nearly 40 percent of conventional Hispanic denials were for credit history, more than 3 times the rate for Whites. The Hispanic sample size of federally supported loan denials was too small to merit inclusion in this analysis.

TABLE: Home Purchase Denials by Race, Ethnicity & by Reason in 2017 (Single Family - Owner Occupied)

Race	Primary Reason for Denial	Percentage of Conventional Loan Denials	Percentage of Federally Supported Loan Denials
Whites	Collateral	12%	13%
	Credit Application Incomplete	8%	9%
	Credit History	12%	20%
	Debt to Income Ratio	33%	29%
	Employment History	3%	0%
	Insufficient Cash	6%	7%
	Mortgage Insurance Denied	0%	0%
	Unverifiable Information	19%	11%
	Other	7%	11%
Hispanic or Latino	Collateral	0%	n/a
	Credit Application Incomplete	13%	n/a
	Credit History	38%	n/a
	Debt to Income Ratio	25%	n/a
	Employment History	13%	n/a
	Insufficient Cash	0%	n/a
	Mortgage Insurance Denied	0%	n/a
	Unverifiable Information	13%	n/a
	Other	0%	n/a

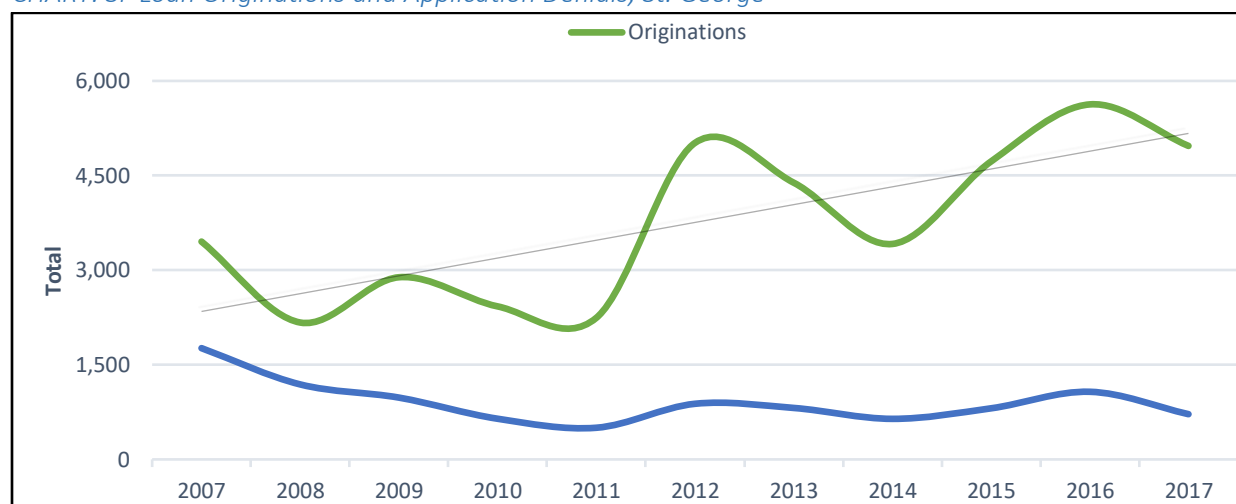
Source: 2017 HMDA

St. George's Single-Family Lending Market, 2007-2017

The following section examines HMDA data over the time period 2007-2017, for the City of St. George as a whole.

Highlighted below, the trajectory of single-family loan originations within St. George between 2007 and 2017 was dynamic, though trended upward overall. While the 2017 origination total was 12 percent lower than the 2016 total, total originations in 2017 were 45 percent higher than 2014, and 129 percent higher than 2008. In contrast to originations, the number of denials had a relatively steadier downward trend between 2007 and 2017, falling by 60 percent, while originations rose 44 percent during the same time period. As a percent of the sum of originations and denials, the share of denials decreased substantially, falling from over one-third to under 13 percent.

CHART: SF Loan Originations and Application Denials, St. George

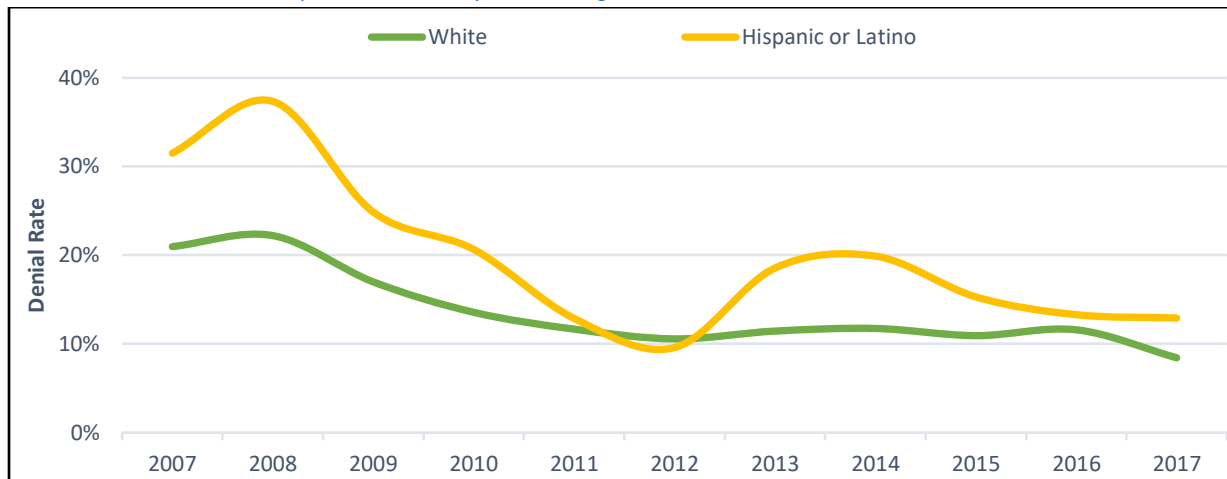


Source: 2017 HMDA

Income, Ethnicity, and Single-Family Loan Denials Over Time

Within St. George, denial rates over time for single-family loans vary by ethnicity. The chart below shows that between 2007 and 2014, Hispanics were denied at higher rates relative to Whites with the exception of 2012. Further, while the gap between Whites and Hispanics narrowed significantly between 2007 and 2012, and the overall denial rate for Hispanics has dropped from 32 percent in 2007 to 13 percent in 2017, Hispanics were 1.5 times as likely to be denied relative to Whites in 2017, the same ratio as 2007.

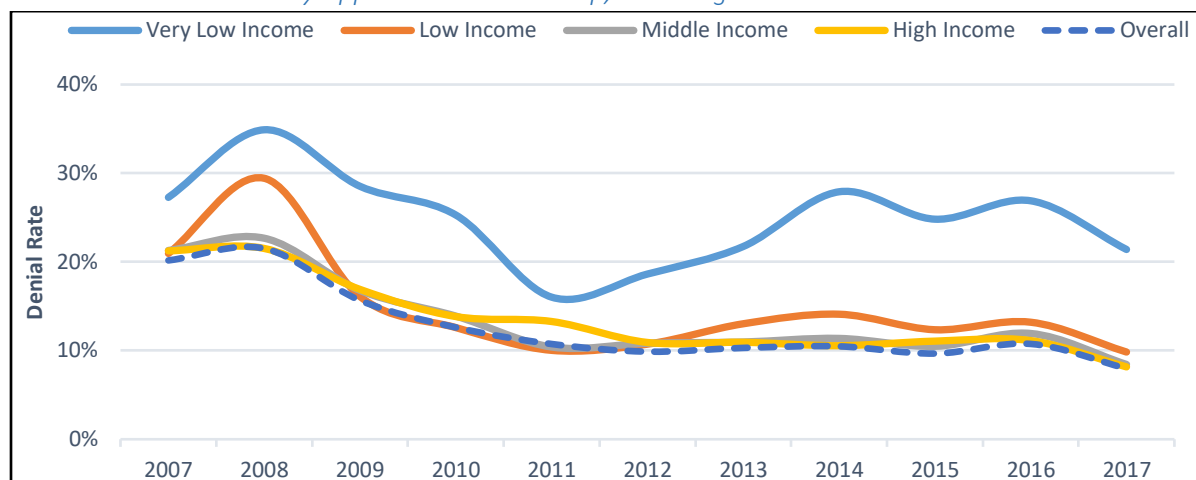
CHART: SF Denial Rate by Race/Ethnicity, St. George



Source: 2017 HMDA

A view of single family denial rates by income group within St. George, highlighted below, shows High Income (greater than 120 percent of Area Median Income), Low Income (80 percent or less of Area Median Income), and Middle Income (80 to 120 percent of Area Median Income) applicants having similar denial rates while Very Low Income (50 percent or less of Area Median Income) applicants are consistently denied at a rate higher than the other groups. Between 2007 and 2017, applicants in the Very Low-Income category were more likely to be denied for a single-family loan than any other income group, with over 20 percent of applications denied in 2017, more than double Low-Income applicants, the second most denied income group. Since 2011, the Very Low-Income group experienced by far the greatest percentage point increase in its denial rate (over 11 percentage points), while during the same period the denial rates for High Income applicants fell by 2 percentage points.

CHART: SF Denial Rate by Applicant Income Group, St. George

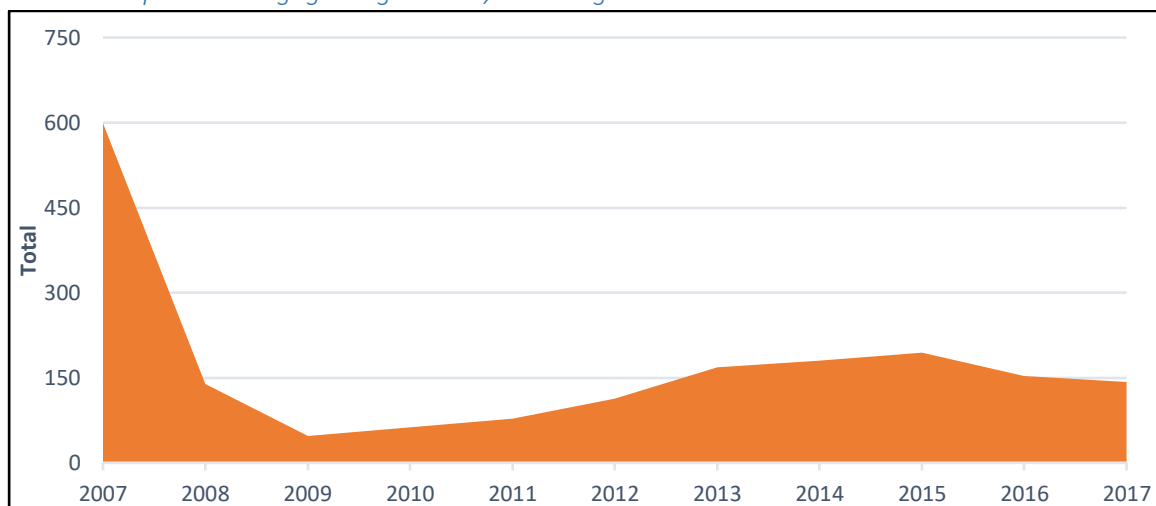


Source: 2017 HMDA

The Subprime Market

Illustrated on the following chart, the subprime mortgage market in St. George has declined significantly since 2007, despite mild increases since the depths of the economic downturn in 2009. The total number of subprime loan originations fell by 76 percent between 2007 and 2017, while prime originations grew by 69 percent during the same time period.

CHART: SF Subprime Mortgage Originations, St. George

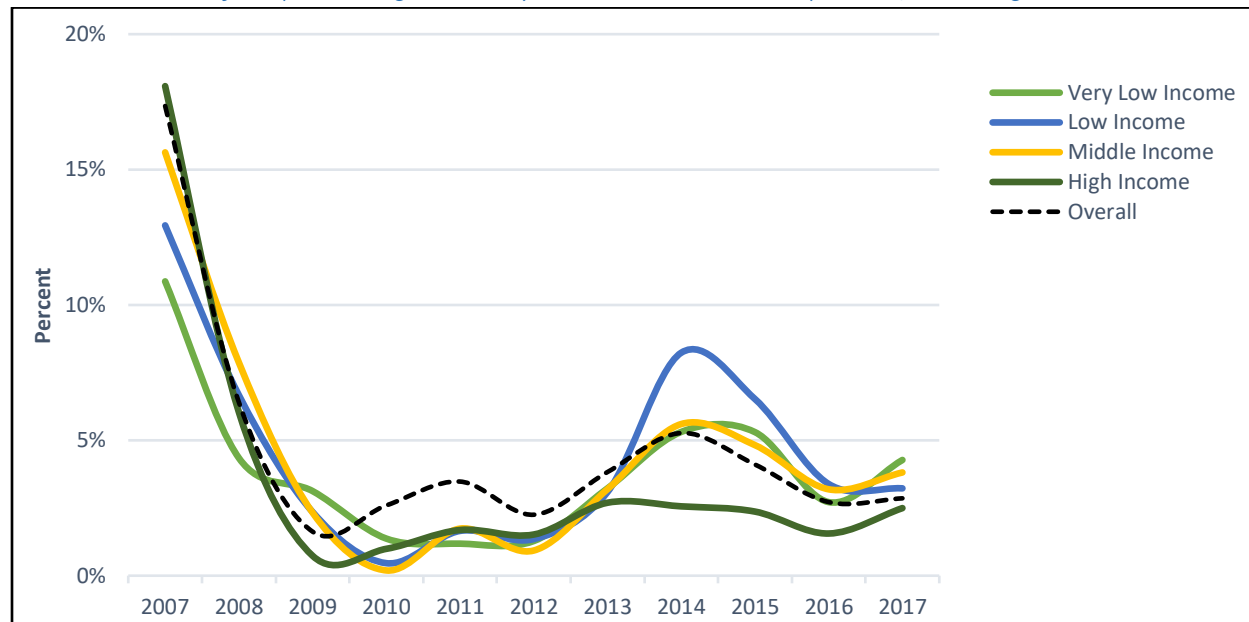


Source: 2017 HMDA

As a percentage of total single-family loan originations, St. George has also seen a significant decrease in subprime originations relative to 2007 levels. As of 2017, subprime originations were less than 3 percent of the city's total, down from over 17 percent in 2007. Subprime originations

as a percent of applicant income group follows a similar pattern, though between 2016 and 2017, the subprime shares for low-income applicants and high-income applicants have started to diverge. The St. George subprime market remains well below 2007 levels as of 2017.

CHART: Percent of Subprime Originations by Borrower Income Group Totals, St. George



Source: 2017 HMDA

St. George's subprime origination trends are consistent with the tightened credit conditions and heightened home lending standards that have taken place in the aftermath of the financial crisis and Great Recession.

Conclusion

Though total mortgage originations fell between 2016 and 2017, the St. George home lending market has trended upward in recent years, including 45 percent growth relative to 2014. Additionally, the subprime market has stabilized to a substantially lower level relative to the years leading up to the housing crisis.

Community Reinvestment Act (CRA)

Since the passage of the Community Reinvestment Act (CRA) in 1977, banks have been strongly encouraged to serve the credit needs of all persons within the community, including those with low and moderate incomes. The CRA establishes a regulatory mechanism for monitoring the level of lending, investments and services in low- and moderate-income neighborhoods that have traditionally been underserved by lending institutions. While most mortgage companies, finance companies, and credit unions are required by HMDA to provide information on their lending activities, many are exempt from CRA coverage and its examination process. Because only federally-insured financial institutions are covered by CRA, mortgage companies, finance companies and credit unions are all exempt from CRA regulations. Commonly, it is considered that only depository financial institutions are covered by CRA.

Currently, three Federal Financial Institutions Examination Council (FFIEC) agencies conduct CRA examinations and enforcement: the Board of Governors of the Federal Reserve System (FRB), the Federal Deposit Insurance Corporation (FDIC), and the Office of the Comptroller of the Currency (OCC). The Office of Thrift Supervision (OTS) was a fourth reporting agency, however as of June 30, 2011 they are no longer an active regulatory agency. Examiners from the three FFIEC agencies assess and “grade” lenders’ activities in low- and moderate-income neighborhoods. Large institutions are graded on how well they meet their CRA obligation according to a three-part test that evaluates actual performance in lending, investing, and providing banking services to the entire community including low- and moderate-income (LMI) borrowers and borrowers (individuals or businesses) located in LMI areas. Smaller institutions are subject to a more streamlined examination that focuses on lending.

Lending institutions receive one of four ratings or grades after a CRA exam. The top two ratings of “Outstanding” and “Satisfactory” mean that a federal examiner has determined that a lender has met its obligation to satisfy the credit needs of communities in which it is chartered. The two lowest ratings, “Needs to Improve” and “Substantial Noncompliance,” reflect a failure on the part of the lending institution to meet the credit needs of communities, particularly the low- and moderate-income communities, in which it is chartered. The three federal agencies examine large banks approximately once every two years. However, large lending institutions with Satisfactory ratings may be examined once every four years and institutions with Outstanding ratings may be examined once every five years.

While poor CRA ratings do not result in immediate sanctions for a lender, receipt of a low CRA rating can curtail an institution’s future plans for service changes or mergers with other financial institutions. When a lender plans to merge with another institution or open a new branch, they

must apply to the Federal Reserve Board and/or to its primary regulator for permission. Receipt of one of the two lowest CRA ratings is considered in the review of the application by the federal agency. The reviewing federal agency has the authority to delay, deny, or add conditions to an application.

A review of the most recent CRA ratings in the last ten years for the St. George lenders surveyed for this analysis reveals that all of the depository financial institutions have received ratings of Satisfactory (source: FFIEC CRA Rating Database 2018).

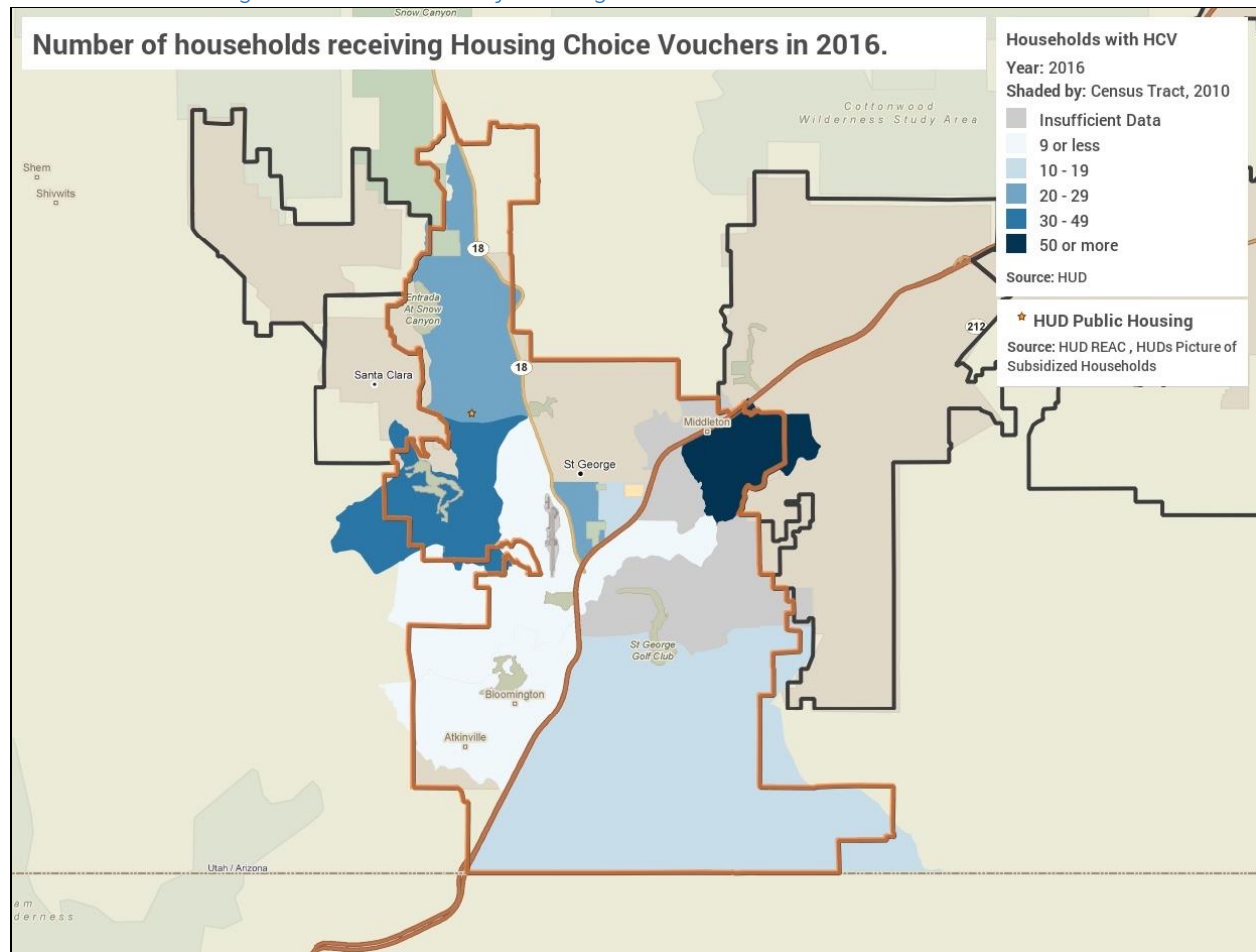
Below is a chart of St. George, Utah lenders and their CRA ratings in the last 10 years.

<i>TABLE: St. George Lenders CRA Ratings (2008-2018)</i>				
Bank	CRA Rating	Rating Period	Bank Size	Location
Sunfirst Bank	Satisfactory	10/06/2008	Small Bank	St. George, UT
The Village Bank	Satisfactory	05/01/2009	Small Bank	St. George, UT
Heritage Bank	Satisfactory	05/13/2009	Small Bank	St. George, UT
Town & Country Bank	Satisfactory	06/01/2010	Small Bank	St. George, UT
Town & Country Bank	Satisfactory	10/01/2013	Small Bank	St. George, UT
Heritage Bank	Satisfactory	10/14/2014	Small Bank	St. George, UT
Source: FFIEC CRA Rating Database 2018				

Public Housing Authority

The St. George Housing Authority (SGHA) is the public housing agency functioning within St. George, Utah. The map below displays the public housing development location and voucher concentration in the area.

MAP: Public Housing and Concentration of Housing Choice Vouchers



Source: HUD REAC via PolicyMap

St. George Housing Authority

The St. George Housing Authority's mission is to assist low-income families with safe, decent, and affordable housing activities. They manage Dixie Sun Manor, a 30-unit senior complex where residents pay approximately 30 percent of their gross adjusted income toward rent and utilities. The waiting list is currently open but wait time is unknown.

SGHA currently administers 244 vouchers that allow recipients to find a unit of their choice within Washington County. The tenants pay approximately 30 percent of their adjusted gross income toward rent and utilities and SGHA pays the remainder.

Public Sector Analysis

Overview

Fair Housing is the right of individuals to obtain the housing of their choice, free from discrimination based on race, color, religion, sex, disability, familial status, or national origin. This right is assured by the Federal Fair Housing Acts of 1968 and 1988, as amended, which make it unlawful to discriminate in the sale, rental, financing, or insuring of housing.

The Fair Housing Acts, as amended, also make it unlawful for municipalities to utilize their governmental authority, including zoning and land-use authority, to discriminate against racial minorities or persons with disabilities. Zoning ordinances codify uses and make differentiations within each use classifications. While many zoning advocates assert that the primary purpose of zoning and land-use regulation is to promote and preserve the character of communities, inclusionary zoning can also promote equality and diversity of living patterns. Unfortunately, zoning and land-use planning measures may also have the effect of excluding lower-income and racial groups.

Zoning ordinances aimed at controlling the placement of group homes are one of the most litigated areas of fair housing regulations. Nationally, advocates for the disabled, homeless, and individuals with special needs have filed complaints against restrictive zoning codes that narrowly define "family" for the purpose of limiting the number of non-related individuals occupying a single-family dwelling unit. For many people who are disabled, the group home arrangement/environment provides the only affordable housing option for residential stability and more independent living. By limiting the definition of "family" and creating burdensome occupancy standards, disabled persons may suffer discriminatory exclusion from prime residential neighborhoods.

This Analysis of Impediments to Fair Housing Choice for the City of St. George discusses the results of recent analyses of impediments and the steps the city intends to take to implement policies that will prevent and eliminate housing discrimination in the community.

Utah Fair Housing Act

The Antidiscrimination & Labor Division (UALD) Fair Housing unit administers and enforces the Utah Fair Housing Act, which prohibits discrimination on the basis of race, color, sex, religion, national origin, disability, source of income, familial status, sexual orientation, and gender identity. The Act specifically prohibits discrimination against anyone who wants to rent or purchase real property (houses, apartments, etc.) based on the listed categories. Additionally,

based on a cooperative agreement with HUD, anyone who files a housing discrimination complaint with this office is automatically filing with HUD. This means the unit is a dual-filing office.

Legislation Pertaining to Fair Housing

Numerous acts, laws, and presidential executive orders have been enacted in order to create fair housing opportunities throughout the US. The following information can be found on the website for the US Department of Housing and Urban Development (HUD). Some of the legislation in the section below does not directly address fair housing, but is included because it promotes the prevention and termination of discrimination, which is related to fair housing law.

Presidential Executive Order 11063

John F. Kennedy, in 1963, created the first piece of fair housing legislation by issuing presidential executive order 11063. The terms of the order stated that “discrimination in the sale, leasing, rental, or other disposition of properties and facilities” is prohibited if the properties or facilities are owned, operated, or funded by the government.

Civil Rights Act of 1964

According to Title VI of the Civil Rights Act of 1964, “discrimination on the basis of race, color, or national origin” is prohibited in programs and activities receiving federal financial assistance.

Presidential Executive Order 11246

Lyndon B. Johnson, in 1965, issued executive order 11246. According to this amended presidential order, discrimination based on race, color, religion, sex, or national origin was forbidden in federal employment.

Fair Housing Act

The Fair Housing Act, which is Title VIII of the Civil Rights Act of 1968, prohibits discrimination or other unfair actions against persons, which “otherwise make unavailable or deny a dwelling to any person because of race, color, religion, sex, familial status, or national origin.” The act prohibits both intentional housing discrimination — disparate treatment — and action or policies that may not seem to discriminate but do have a negative effect on fair housing choice — disparate impact. The federal Fair Housing Act provides for a broad range of sanctions and remedies to cure existing and prevent future violations.

Architectural Barriers Act

In 1968 the Architectural Barriers Act was enacted to increase accessibility for handicapped individuals. The act “requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds [...] must be accessible to and useable by handicapped persons.”

Education Amendments Act

Title IX of the Education Amendment Act of 1972 prohibits discrimination on the basis of sex. This applies to federally funded education programs or activities.

Rehabilitation Act

The Rehabilitation Act of 1973 is a provision of the federal Fair Housing Act administered by HUD. Section 504 of the act prohibits a “refusal to make accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford them [the handicapped person] equal opportunity to use and enjoy a dwelling [...] including public and common use areas.” This act includes nearly all public activities that can adversely affect housing for handicapped people and is not limited to federally funded projects.

Housing and Community Development Act

Section 109 of Title I of the Housing and Community Development Act of 1974 protects against discrimination when HUD funds are involved. That is, programs and activities receiving financial assistance from HUD’s Community Development Block Grant Program cannot discriminate based on race, color, national origin, sex, or religion.

Home Mortgage Disclosure Act

The Home Mortgage Disclosure Act (HMDA), passed by Congress in 1975, was created in order to make loan information publicly available. HMDA mandates that information to help determine how financial institutions are responding to the housing needs be made available to local communities. HMDA also assists public officials in attracting private investors. Additionally, the Act aids in identifying discriminatory lending practices. HMDA requires the disclosure of information from banks, savings associations, credit unions, and other mortgage lending institutions. The required information includes the distribution of home mortgage and home improvement lending on a geographic and demographic basis such as the distribution of mortgage loans to minorities. More specifically, reporting requirements include data on the number, type, and amount of loans as well as the type of action taken — applications approved but not accepted, applications denied, applications withdrawn, or files closed as incomplete. For more information see: (<http://www.ffiec.gov/hmda/history.htm>).

Age Discrimination Act

The Age Discrimination Act of 1975 prohibits discrimination on the basis of age. This applies to federally funded programs or activities.

Community Reinvestment Act

According to the U.S. Environmental Protection Agency, lenders, developers and property owners are concerned about the cost and liabilities of cleaning up and refinancing low-to-moderate income urban neighborhoods, leading them to develop in other areas that are perceived to be less risky. The Community Reinvestment Act (CRA) was enacted by Congress in 1977, to “require banks, thrifts, and other lenders to make capital available in low- and moderate-income urban neighborhoods, thereby boosting the nation’s efforts to stabilize these declining areas.” For more information see: (<http://www2.epa.gov/brownfields>).

The CRA applies to: federally insured depository institutions, national banks, thrifts, and state-chartered commercial and savings banks. It works to prevent redlining – discrimination by refusing to grant loans, mortgages or insurance to people in a specific area, particularly those deemed poor or to be “financial risks.”

In May 1995, the Office of the Comptroller of the Currency revised the CRA to allow lenders to claim community development loan credits for loans “made to help finance the environmental cleanup or redevelopment of an industrial site when it is part of an effort to revitalize the low- and moderate-income community in which the site is located.” This revision was intended to encourage economic activity in inner-city neighborhoods through financing and property redevelopment.

The CRA requires that each insured bank’s record of helping meet the credit needs of its entire community be evaluated periodically. There are several organizations that work to promote and ensure the credibility and compliance of all lenders subject to the CRA: Office of the Comptroller of the Currency (OCC), Board of Governors of the Federal Reserve System (FRS), and the Federal Deposit Insurance Corporation (FDIC). The Office of Thrift Supervision (OTS) as of 2011 is no longer an active regulatory agency. The following active institutions are required to report data under the CRA:

- All savings associations except small institutions (those with total assets equaling less than \$1 billion in the past 2 years) regulated by the OTS.
- All state member banks, state nonmember banks, and national banks except small institutions (those with total assets less than \$250 million in the past 2 years) regulated by the FRS, FDIC, and OCC.

Amendment of the Federal Fair Housing Act

In 1988 the federal Fair Housing Act was amended to include handicapped persons among those protected; those with one or more handicaps are discriminated against when there is a failure to make reasonable modifications to residential premises which may be necessary to enable a handicapped person “full enjoyment of the premises.”

Americans with Disabilities Act

Title II of the Americans with Disabilities Act of 1990 prevents discrimination against disabled persons. More specifically, public programs, services, and activities cannot discriminate based on disabilities. Further, “HUD enforces Title II when it relates to state and local public housing, housing assistance, and housing referrals.”

Presidential Executive Order 12892

In 1994 President William J. Clinton issued his first presidential executive order pertaining to fair housing. The amended executive order 12892 “requires federal agencies to affirmatively further fair housing in their programs and activities.”

Presidential Executive Order 12898

In 1994, President Clinton issued his next presidential executive order pertaining to fair housing. According to executive order 12898, federal agencies must conduct programs, policies, and activities that have an impact on the environment and individuals’ health in a way that does not exclude anyone based on race, color, or national origin.

The Quality Housing and Work Responsibility Act

The Quality Housing and Work Responsibility Act (QHWRA), signed by President Clinton in 1998, applies to public housing and public housing voucher programs. Its purposes range from “reducing the concentration of poverty in public housing,” to creating opportunities and incentives for public housing residents to find work, to rehabilitating public housing units through the establishment of the HOPE VI program.

Presidential Executive Order 13166

In 2000, President Clinton issued his final presidential executive order pertaining to fair housing. Executive order 13166 strives to eliminate the barrier caused by poor English proficiency that would deny benefits from federally funded programs and activities.

Presidential Executive Order 13217

In 2001, President George W. Bush issued the most current fair housing-related executive order.

His executive order 13217 requires federal agencies to examine their policies and programs in order to find way to improve the availability of “community-based living arrangements for persons with disabilities.”

Promoting Fair Housing and Fair Lending

U.S. Department of Housing and Urban Development

In 1965, the Department of Housing and Urban Development Act created the Department of Housing and Urban Development (HUD) as a Cabinet-level agency. The Civil Rights Act of 1968 made most types of housing discrimination illegal and gave HUD “enforcement responsibility” when dealing with fair housing practices. The official website for HUD states that the department’s primary purpose is to “promote non-discrimination and ensure fair and equal housing opportunities for all.” HUD’s main responsibilities involve “implementing and enforcing a wide array of civil rights laws, not only for members of the public in search of fair housing, but for HUD funded grant recipients as well,” and are enforced by a group of laws known as the Civil Rights Related Program Requirements, or CRRPRs.

HUD-funded grant recipients are obligated by law not to discriminate “in housing or services directly or indirectly on the basis of race, color, religion, sex, national origin, age, familial status, or disability.” According to the FHA, the Secretary of HUD “shall administer programs and activities relating to housing and urban development in a manner that affirmatively furthers the policies outlined” within sections of the Act. Some examples of these programs and activities include but are not limited to offering counseling programs, establishing fair housing enforcement organizations in areas of need, working with housing providers, and encouraging banks and lenders to use more non-traditional credit evaluation methods.

The amended Housing and Community Development Act of 1974 is the primary law for the Community Development Block Grant (CDBG) Program. Under this act, every grant recipient is responsible for assuring HUD that the grant will be carried out in a manner that affirmatively furthers fair housing. CDBG recipients are required to:

1. Examine and attempt to alleviate housing discrimination within their jurisdiction
 2. Promote fair housing choice for all persons
 3. Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin
 4. Promote housing that is accessible to and usable by persons with disabilities
 5. Comply with the non-discrimination requirements of the Fair Housing Act
- HUD’s Super Notice of Funding Availability (SuperNOFA) provides funds to ensure that HUD and

grantees work towards furthering fair housing and decreasing housing discrimination.

HUD and Fair Lending

Fair lending plays a major role in fair housing. The FHA states that it is unlawful to discriminate in the following ways based on race, color, national origin, religion, sex, familial status, or disability:

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms of conditions on a loan, such as different interest rates, points, or fees
- Discriminate in appraising properties
- Refuse a loan or set different terms of conditions for purchasing a loan

HUD investigates claims of lending discrimination at no charge. “HUD has conducted a number of studies to determine whether minority homebuyers receive the same treatment and information as whites during the mortgage lending process.” HUD also addresses issues such as subprime lending, predatory lending, and minority homeownership. (Source: <http://portal.hud.gov/hudportal/HUD>)

Community Development Block Grant (CDBG) — St. George

Entitlement Grants are awarded to urban communities on a formula basis to support affordable housing and community development activities. The Community Development Block Grant (CDBG) program is used to plan and implement projects that foster revitalization of eligible communities. The primary goal of the program is the development of viable communities. Program objectives include the provision of decent housing, a suitable living environment, and expanded opportunities principally for low- to moderate-income individuals and families. The City of St. George receives its CDBG allocation directly from HUD. Activities include:

- Acquisition/Rehabilitation
- Homebuyer Assistance
- Homeless Assistance
- Economic Development
- Public Improvements
- Public Services

The city's community and neighborhood development activities are administered through the St. George Community Development Block Grant Program in the Community Development Department. Project eligibility is outlined in accordance to HUD program objectives, which are:

- 1) Development of urban communities including decent housing and a suitable living environment.

- 2) Expanding economic opportunity, primarily for low- and moderate-income persons.

In order to achieve the program objectives, each qualifying activity must meet one of the three broad National Objectives:

- a) Primarily benefit low- and moderate-income families. More specifically, 51% of the project must benefit families with incomes at or below 80% of the median income.
- b) Aid in the prevention or elimination of slum or blight. Activities considered to aid in the prevention or elimination of slum or blight are activities located within a designated area which: 1) meets a definition of a slum, blighted, deteriorated, or deteriorating area under State or local law; and 2) where there is a substantial number of deteriorating or dilapidated buildings or needed improvements throughout the area.
- c) Meet urgent community development needs. The proposed project must meet needs that have a particular urgency where existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet such needs.

The City of St. George posts an annual application with requirements on its website at: <https://www.sgcity.org/administration/formsandapplications/communitydevelopmentblockgrantcdbg>

Applications can also be found and delivered to:

City of St. George
Community Development Department
C/O Genna Singh
175 East 200 North
St. George, UT 84770

HOME Investment Partnership Program

The HOME Investment Partnerships Program (HOME) is authorized under Title II of the Cranston-Gonzalez National Affordable Housing Act, as amended. Program regulations are at 24 CFR Part 92. HOME “provides formula grants to states and localities that communities use – often in partnership with local nonprofit groups – to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or provide direct

rental assistance to low-income people.

HOME is the largest federal block grant to state and local governments designed exclusively to create affordable housing for low-income households.”⁴ Each year it allocates approximately \$2 billion among the states and hundreds of localities nationwide.

Grantees, referred to as Participating Jurisdictions (PJs), may choose among a broad range of eligible activities using HOME funds, including but not limited to: 1) providing home purchase or assistance to new homebuyers, 2) building or rehabilitating housing for rent or ownership, 3) or for other reasonable and necessary expenses related to the development of non-luxury housing, including site acquisition or improvement, demolition of dilapidated housing to make way for new HOME- assisted developments, and payment of relocation expenses.

All HOME-based housing and rental assistance must be targeted to low-income families. Jurisdictions must reserve 15% of their HOME funds for housing that is developed, sponsored, or owned by Community Housing Development Organizations (CHDOs). A CHDO is a private, community-based non-profit that has among its purposes the provision of decent, affordable housing for low-income persons.

The HOME program is administered through the State of Utah along with various participating jurisdictions, which then administer this program throughout non-entitlement HOME areas throughout the state.

Emergency Solutions Grant (ESG)

The Emergency Solutions Grant (ESG) is a Federal grant that was established by the Homeless Housing Act of 1986, in response to the growing issue of homelessness among men, women & children in the United States. In 1987, the ESG program was incorporated into subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371-11378). The ESG program is administered in Utah through the State Community Services Office.

The objectives of the Emergency Solutions Grant program are:

⁴ Housing and Urban Development, “HOME Investment Partnerships Program: FY 2016 HOME Information”

http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/affordablehousing/programs/home/

- Increase the number and quality of emergency shelter and transitional housing facilities for homeless individuals and families
- Operate these facilities
- Provide essential social services
- Help prevent homelessness

The four main ESG Program Eligible Activities are:

- Homeless Prevention
- Essential Services
- Operational and Maintenance
- Renovation, Rehabilitation, and Conversion

[US Department of Agriculture \(USDA\) – Rural Development](#)

The US Department of Agriculture (USDA) administers several housing programs through their Rural Development program. Community development programs are a major focus of the USDA Rural Development mission. The Rural Development programs invest hundreds of millions of dollars each year in rural Utah to improve the quality of life for thousands of individuals through housing; upgrades to rural electric services, water, and wastewater services; community facilities programs; renewable energy and energy efficiency; business and cooperative development; and job creation. The USDA Rural Development program assists families and individuals in Utah with their need for decent, safe, sanitary, and affordable housing. Single Family Housing (SFH) programs administered by USDA offer homeownership and home improvement loans and grants for individuals and families in rural areas. The nearest USDA Rural Development office is located in Cedar City in neighboring Iron County and can be reached at (435) 586-7274.

[Housing Opportunities for Persons with AIDS \(HOPWA\)](#)

The Housing Opportunities for Persons with AIDS (HOPWA) program is designed to provide housing assistance and supportive services for low-income people with HIV/AIDS and their families. HOPWA has been successful in helping organizations work with individuals with HIV/AIDS and their families to deal with crisis management, illness, and the depletion of finances. Funding may be used for a range of activities including: housing information services, resource identification, project- or tenant-based rental assistance, short-term rent, mortgage and utility payments to prevent homelessness, housing and development operations, and supportive services.

In Utah, the State Community Services Office (SCSO) oversees the HOPWA program and contracts

with community partners to implement the program at the local level. These community partners “use the funds for a range of housing, social services, program planning, and development costs. These include, but are not limited to, the acquisition, rehabilitation, or new construction of housing units; costs for facility operations; rental assistance; and short-term payments to prevent homelessness. An essential component in providing housing assistance for this targeted population with special needs is the coordination and delivery of support services. HOPWA grantees through SCSO are expected to participate in coordinating the necessary supportive services for their clients.”⁵

Low-Income Housing Tax Credit Program

The Low-Income Housing Tax Credit Program (LIHTC) was created by the 1986 Tax Reform Act and is designed to provide an incentive to owners developing multifamily rental housing. The Internal Revenue Service and Utah Housing Corporation (UHC) jointly administer the LIHTC program in Utah. Developments that may qualify for credits include new construction, acquisition with rehabilitation, rehabilitation, and adaptive reuse.

Owners of and investors in qualifying developments can use the credit as a dollar-for-dollar reduction of federal income tax liability. Allocations of credits are used to leverage public, private, and other funds in order to keep rents to tenants affordable.

Candidates eligible for Tax Credits include: individuals, partnerships, corporations, for-profit or nonprofit organizations, and other legal entities. Eligible applicants must submit proposals to be ranked in accordance with the Qualified Allocation Plan (QAP). Authority staff will evaluate all applications for LIHTCs to determine if the proposed development meets the State’s housing need priorities.

Eligible developers must submit proposals to be ranked in accordance with the QAP. That ranking is based on housing need, priorities and other criteria. The evaluation will also ensure a development does not receive more tax credits than are needed for it to be financially feasible.

Developers must comply with federal guidelines governing tenant income. To be eligible, a development must have at least 20% of its units occupied by households earning at or below 50% of the area median income, or 40% of its units occupied by households earning at or below 60%

⁵ Utah Department of Workforce Services, “Housing Opportunities for People with Aids.” http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/affordablehousing/programs/home/

of the area median income.

Multi-family Tax Exempt Bond Financing Program

The Multi-Family Tax Exempt Bond Financing Program is designed to promote multi-family rental housing development and has provided permanent financing for thousands of rental-housing complexes throughout Utah. Administered by Utah Housing Corporation (UHC), the program provides permanent real estate financing for properties being developed for multi-family rental use that target low- and moderate-income tenants. Eligible recipients include both non-profit and for-profit developers and must have sufficient experience in multi-family rental housing designed for use by low-to-moderate income tenants.

Utah Housing Corporation Homeownership Programs

The Utah Housing Corporation (UHC) has several mortgage and homeownership programs available to assist in the purchase of a home. If cash is a challenge, UHC has the Down Payment Assistance Program. Qualified borrowers can apply and purchase a home with little or no cash investment. UHC also offered several first mortgage loan programs and can refer to UHC approved lenders to help homebuyers find a loan that matched their needs.

Transportation in St. George

Although public transportation options in St. George are improving, continued efforts to expand services – particularly in rural and poorer areas – are warranted. Transportation efforts in the city are headed by two state entities, the Utah Department of Transportation (UDOT) and the Utah Transportation Commission (UTC). While UDOT is responsible for the day-to-day operations and programming, UTC's role is defined in Utah Statute §72-1-303, which outlines the duties of the Commission: determine the priorities and funding levels of projects, additions, and deletions to state highways; provide hearings and opportunities for public input; develop policies and rules necessary to perform duties; review transit plans and administrative rules; and advise the Department in state transportation systems policy. UDOT has 4 regions in the state; St. George is located in Region 4.

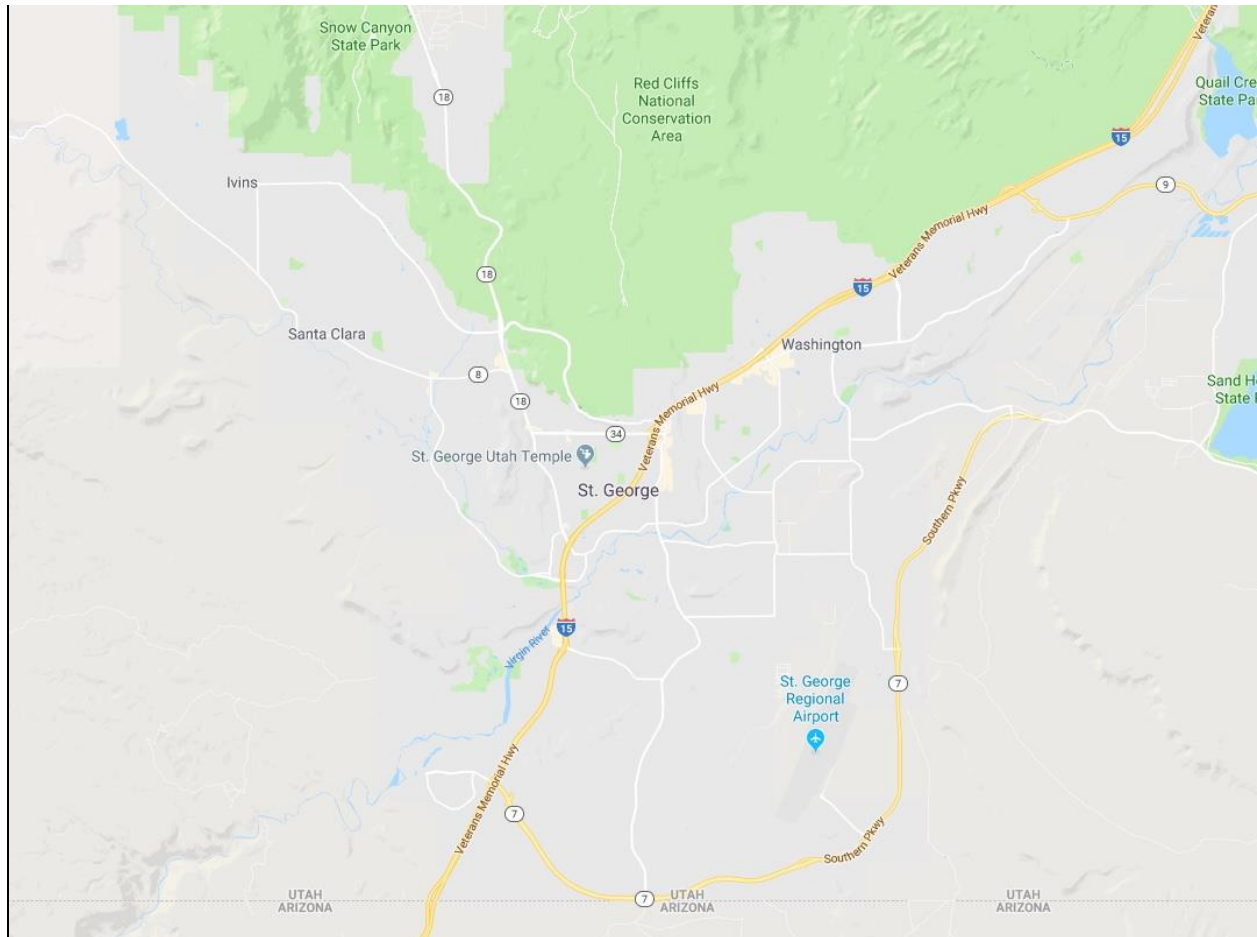
The St. George Regional Airport services flights from both Delta Air Lines, American Airlines, and United Airlines. It provides another option for convenient regional travel. The new airport was completed in 2011. It features a 35,000 sq. ft. terminal building, which is expandable if there are opportunities that arise as the market dictates. This flexibility is necessary, as the city's population is projected to grow rapidly in the next few decades. Primary routes operated by

United and Delta fly to Salt Lake City, Los Angeles, CA and Denver, CO. American Airlines operates a route to Phoenix, AZ.

Travel and Rate of Growth in St. George and the Region

A safe and efficient transportation system is critical to the livelihood of a growing region. The transportation network facilitates the internal day-to-day functioning of the community and provides access to and from centers where goods and services are exported and imported. The two modes of transportation in St. George and the surrounding region are roadways and the airport. There are no railroads in the city. As in all predominately rural areas of the state, a system of roads and highways provides the primary mode of transportation for people traveling into St. George.

MAP: Road Map in St. George



Map data ©2018 Google

Veterans Memorial Hwy/Interstate 15 (I-15) is by far the most important and primary corridor in and out of St. George. Salt Lake City is approximately 302 miles north of St. George, and Las Vegas, NV is 119 miles southwest. I-15 is the sole north-south corridor in the region. People in rural parts of Utah utilize the highway to travel through the state and into St. George. As is standard for an interstate, I-15 has a two-lane minimum in each direction. The only other major mode of transportation in and out of St. George is a plane at the St. George Municipal Airport.

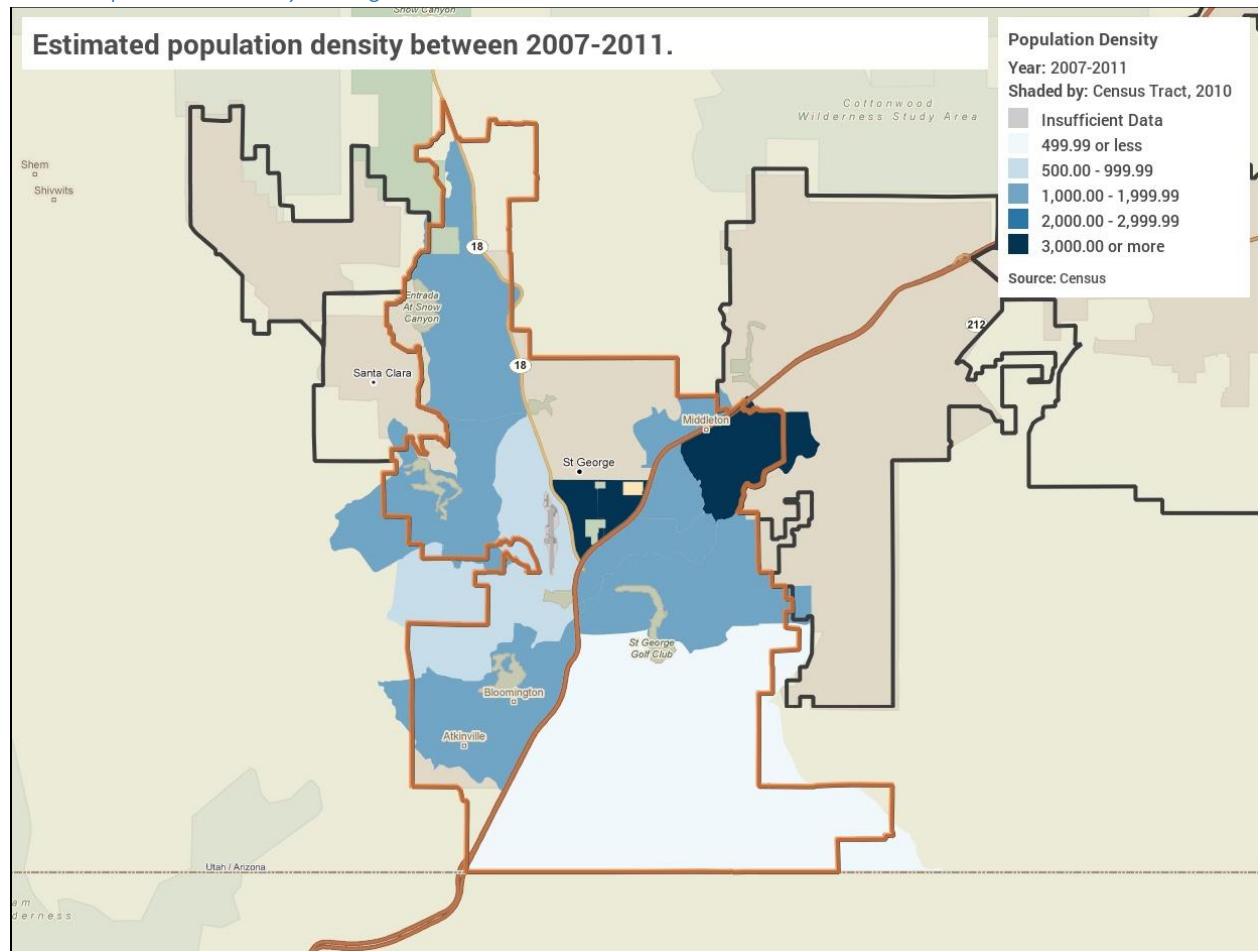
Upkeep and improvements to Interstate 15 and other important roads in the region are essential to the growth of the city. Construction can sometimes create disruptions that cause unwanted congestion and added travel time, not only in the city, but also for people traveling up and down the I-15 corridor and those commuting into St. George. UDOT publishes on its website studies on improving Utah's roads and a list of proposed and current projects on its website. As of 2018, these are three current and recent projects in close proximity to the City of St. George. They are:

- 1) Old Hwy 91, Swiss Village, Santa Clara to 200 E. (status: under construction)
- 2) I-15; Dixie Drive Interchange (status: substantially completed)
- 3) SR-7; Warner Valley to Washington Dam Road (status: substantially completed)

The rate of growth and development can, in large part, be determined by studying the changes in land use in the city. Growth management is best accomplished by identifying the current land uses and projecting future uses based on a number of factors, including population estimates and projections; commercial, residential, and industrial development; and existing land use conflicts.

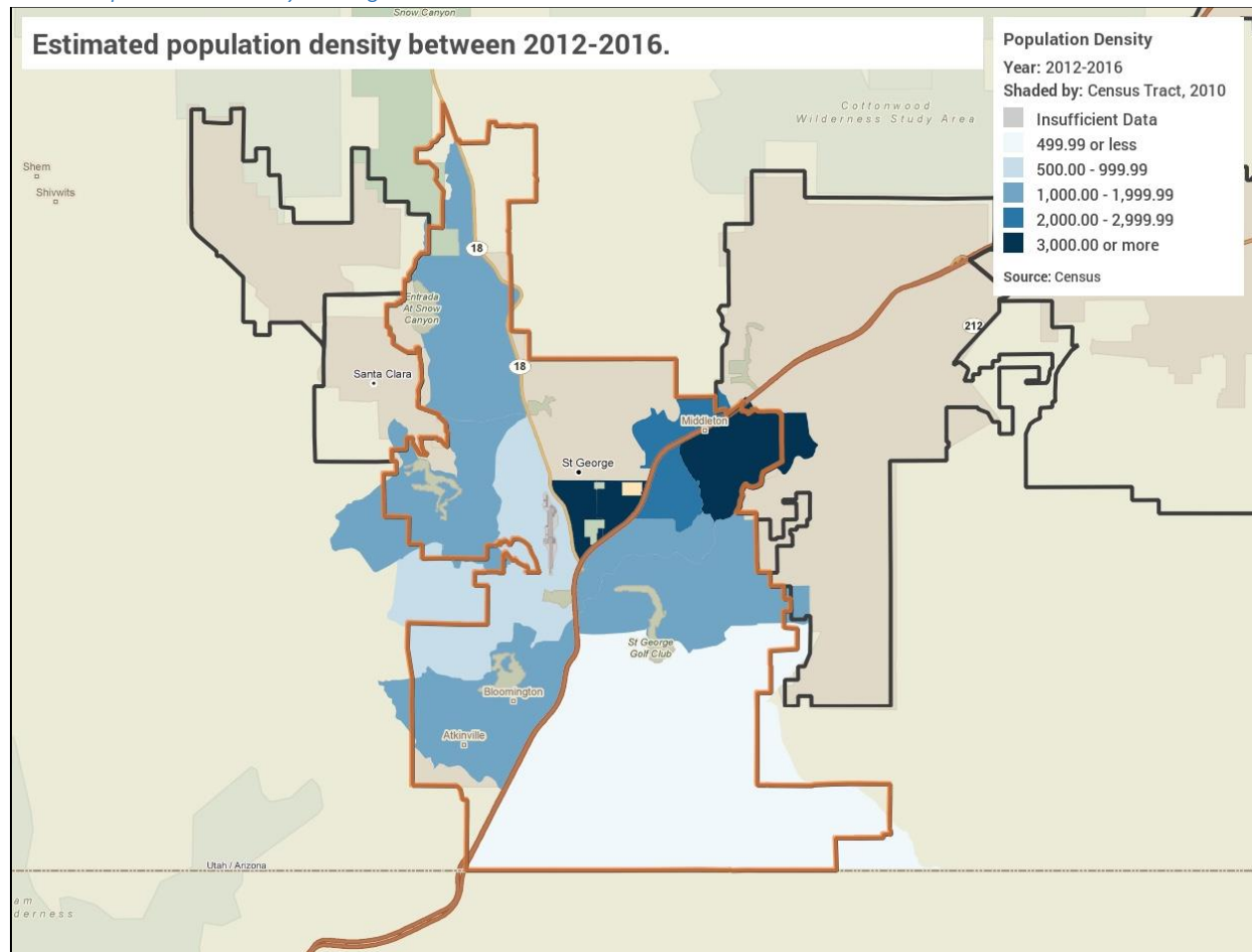
For comparison, the following two maps on the next page display the population densities in 2011 and 2016. The population density is determined by taking the count of people and dividing it by the square mileage of the area. While the population growth in St. George is rising from year to year, the population density is growing more rapidly along I-15.

MAP: Population Density Change 2011



Source: 2007-2011 ACS via PolicyMap

MAP: Population Density Change 2016



Source: 2012-2016 ACS via PolicyMap

The population density between 2011 and 2016 remained static. High growth areas have convenient access to the interstate and progressive economic development activity. There are several other areas that have the potential for this type of high growth and congestion in the future – especially the points of access to I-15.

Property Tax and Insurance

With the support of the Federal government, many of the older counties across the country have begun to invest in economic and community development programs designed to revitalize their crumbling town core. This type of development demands an ability to achieve fairness in the appraisal process within these neighborhoods. Since the starting point for most bank appraisals is the tax department, discriminatory assessment practices can undermine a homebuyer's ability to secure mortgage financing in an amount equivalent to the property's true market value.

Although the Fair Housing Act specifically prohibits the consideration of the racial or ethnic composition of the surrounding neighborhood in arriving at appraised values of homes, no practical means exist to investigate violations of this kind. One reliable approach is to periodically review the assessment policies and practices of the taxing jurisdiction since their valuations generally comprise the basis for private appraisals.

Property tax assessment discrimination against low-income groups occurs when lower value properties and/or properties in poorer neighborhoods are assessed for property tax purposes at a higher percentage of market value, on average, than other properties in a jurisdiction. Regressive assessments (the tendency to assess lower value properties at a higher percentage of market value than higher value properties) are not uncommon in this country. They result from political pressures, practical problems in assessment administration, and the use of certain inappropriate appraisal techniques. Assessments tend to remain relatively rigid at a time when property values are rising in middle-income neighborhoods and are declining or remaining at the same level in low-income neighborhoods.

Inequities in property tax assessments are a problem for both lower-income homeowners and low-income tenants. Millions of low-income families own homes. Variation in assessment-to-market value ratios between neighborhoods or between higher- and lower-value properties can make a difference of several hundred dollars or more each year in an individual homeowner's property tax bill. In addition to causing higher property tax bills, discriminatorily high assessment levels can also have an adverse impact upon property values. Buyers are less likely to purchase a property if the property taxes are perceived as too high, thereby making the property less attractive and reducing its market value.

Another common inequity is the assessment of multi-family dwellings at a higher ratio to market value than single-family dwellings. This type of inequity may be considered a form of discrimination against low-income groups because a higher percentage of low-income than middle-income persons live in multi-family rental dwellings. The requirement to pay a higher

assessment is passed on to the tenant in the form of higher rent. Quite often, higher assessments also make it difficult for landlords to maintain property within the limits of the property's rent structure, leading to substandard housing conditions.

Most jurisdictions rely heavily on a market value approach to determining value when conducting their property assessment appraisals. Under this approach, an appraiser compares recent sale prices of comparable properties within the area – in addition to site visits and a good deal of expert speculation – in the appraisal process. There are many limitations inherent in market value approaches. Most prominent among them is the cumulative result of decades of discriminatory valuations, especially where the neighborhood is a minority one. Unless some radical re-appraisal process has been conducted within the preceding 10-year period, the present market value approach merely compounds past discrimination.

While the market value approach may operate successfully in some jurisdictions, a substantial percentage of jurisdictions rely primarily on a replacement cost approach in valuing properties. Making determinations of value based on comparable sales is a complex task, which requires considerable exercise of judgment. Assessment departments, which must appraise every property within a jurisdiction, often do not find it feasible to make the detailed individual analysis required to apply the market value approach.

As of 2010, the median real estate taxes paid in Washington County, Utah was \$1,231 on a median home value of \$240,900. This was lower than the state average at \$1,340 and the country as a whole at \$1,981 for median real estate taxes paid. The Washington County Assessor's Office is responsible for examination of all properties in the county subject to assessment, ensuring the assessment values are equitable and uniform. Appraisers search for significant information pertaining to a property and analyze factors that affect value in order to estimate the fair market value of a property.

To find the value of any property in the county, the assessor must first know what similar properties are selling for, what it would cost to replace it, how much it costs to operate it and keep it in repair, and what rent it may earn. An employee from the County Assessor's office visits and measures each home to determine square footage. The employee also notes other information, such as age, type of construction, type of heating and air conditioning, number of floors, and whether the structure has a garage, deck, swimming pool, or other amenities.

The Assessor's Office then considers this information alongside similar properties that have sold in the area, adjusting that sales information to fit each property. For rental or commercial property, an evaluation is made on how much income the property produces, what the operating

expenses are, and what kind of investment return can be reasonably expected. With all of this information, the Assessor's Office then determines the market value of the property.

While there were no specific data available for home insurance costs in the County or St. George, home insurance is also an added cost that can affect the cost of housing. (Data Source: The Tax Foundation 2010)

Planning and Zoning

Planning and zoning, new developments, and building and safety regulations in St. George fall under the purview of the Community Development Department. The Department provides support to six city boards: Planning Commission, Board of Adjustments, Board of Appeals, Historic Preservation Commission, Sign Review Board, and Hillside Review Board.

Utilities in St. George

Infrastructure capacity, maintenance, and creation are directly correlated to the economic health of a region. Specifically, access to water and sanitary sewer service are considered by many businesses to be a cornerstone of their operations. Access to safe, affordable energy is also vital. The provision of basic utilities like water and sewer services can sometimes add considerable costs to an affordable housing development. Especially when line extensions are required to a new and previously undeveloped site, the burden on the builder can be enough to make the project unattractive. This may also be the case where there is the need to upgrade and improve service in existing areas. Owners of Low Income Housing Tax Credit (LIHTC) properties must deduct estimated utility costs when they establish the net rent they will charge their tenants. These estimates may be much higher than the actual utility costs if the estimates are based on older properties with less efficient construction and appliances. Gross rents are capped as a percentage of the residents' eligible income, so estimating higher utility costs translates into actual reduced cash flows from the net rents, leaving the owner with less money available to service the mortgage and cover operating and maintenance costs. Water and sewage operations in the city are serviced by the City of St. George Water Services Department (WSD). Further, Washington County Water Conservancy District requires a one-time impact fee to fund the construction of public facilities needed to serve new development activity. This additional cost should be considered in the overall financial estimates. City of St. George's Energy Services Department (SGESD) is responsible for servicing energy needs.

Health Care Facilities

Healthcare is particularly important to the many segments of the population that are heavily represented among the very low- and low-income populations in St. George. The elderly, the disabled, and those with special needs are especially vulnerable to health care issues and in need of ready access to medical facilities. The geographic distribution of these population centers in relation to accessible medical and healthcare facilities should be evaluated periodically. While emphasis may be placed on expanding and improving the new and modern facilities located in the more developed portions of the city, attention should continue to be directed to the older established but poorer communities where many of these populations are clustered.

The table below lists the prominent hospitals and health centers in the City of St. George.

TABLE: St. George Hospitals and Health Centers	
Healthcare Facility	Address
Callahan Clinic	1240 E 100 S St George, UT 84790
Dixie Regional Medical Center - Intermountain Healthcare	1380 E Medical Center Dr. St George, UT 84790
Doctors' Volunteer Clinic of St. George	1036 E Riverside Dr. St George, UT 84790
River Road Instacare	577 S River Rd St George, UT 84790
St. George Clinic - Revere Health	736 S 900 E #203 St George, UT 84790
Sunset Clinic- Intermountain Healthcare	1739 W Sunset Blvd St George, UT 84770

Dixie Regional Medical Center is the major medical referral center in St. George, and also for northwestern Arizona, southeastern Nevada, and southern Utah. The center is located just east of the interstate in the center of the city and has 245 patient beds. It is fully accredited by the Joint Commission and serves as a Level II Trauma Center, caring for almost all trauma patients (with the exception of major pediatric trauma). The Center is managed and operated by Intermountain Healthcare, a nonprofit health care system that is located in the state of Utah, and is the largest healthcare provider in the intermountain west region.

Fair Housing

Under the Utah Fair Housing Act enacted in 1989, it is unlawful to discriminate in housing on the basis of race, color, religion, sex, national origin, familial status, source of income, disability, sexual orientation, or gender identity. With few exceptions, anyone who has control over residential property and real estate financing must adhere to these regulations. This includes rental managers, property owners, real estate agents, landlords, banks, developers, builders, insurers, home inspectors, and individual homeowners who are selling or renting property.

The Fair Housing Unit within the Antidiscrimination & Labor Division of the Utah Labor Commission administers and enforces fair housing law in the state and handles fair housing complaints. The Fair Housing Unit is a dual-filing office: based on a cooperative agreement with HUD, anyone who files a housing discrimination complaint with the office is automatically filing with HUD.

Fair Housing Complaints

To register a complaint with the State of Utah Antidiscrimination & Labor Division (UALD), the aggrieved party must officially file the complaint within 180 days after the date of the alleged discrimination. Within 10 days of the initial filing, the compliance staff of the Labor Commission investigates the complaint and notifies the applicant of the validity of the complaint. If a violation has occurred, a formal complaint form is completed. During this process, every effort is made to mediate and resolve the problem. The primary mechanism used for mediation and resolution of complaints is the Mediation/Alternative Dispute Resolution effort.

On its website, UALD has an 8-step guide on what to expect when a housing complaint is filed with the commission, from deciding whether to file a claim to the appeal process.⁶ Complaints can be received toll free instate at: (800) 530-5090 or at the St. George Office located at Blackridge Terrace Office Building 1, Suite 304, 1173 South 250 West, St. George, UT 84770.

A review of the complaints filed in the City of St. George from 2013-2018

Analyzing the complaints filed under fair housing laws is useful in discerning which types of discrimination are most prevalent among St. George households and which protected groups are most commonly affected. In a sample of the most recent 5 years, the Utah Labor Commission recorded 12 fair housing complaints in the City of St. George. Disability was by far the largest

⁶ http://laborcommission.utah.gov/divisions/AntidiscriminationAndLabor/x_housing_process.html

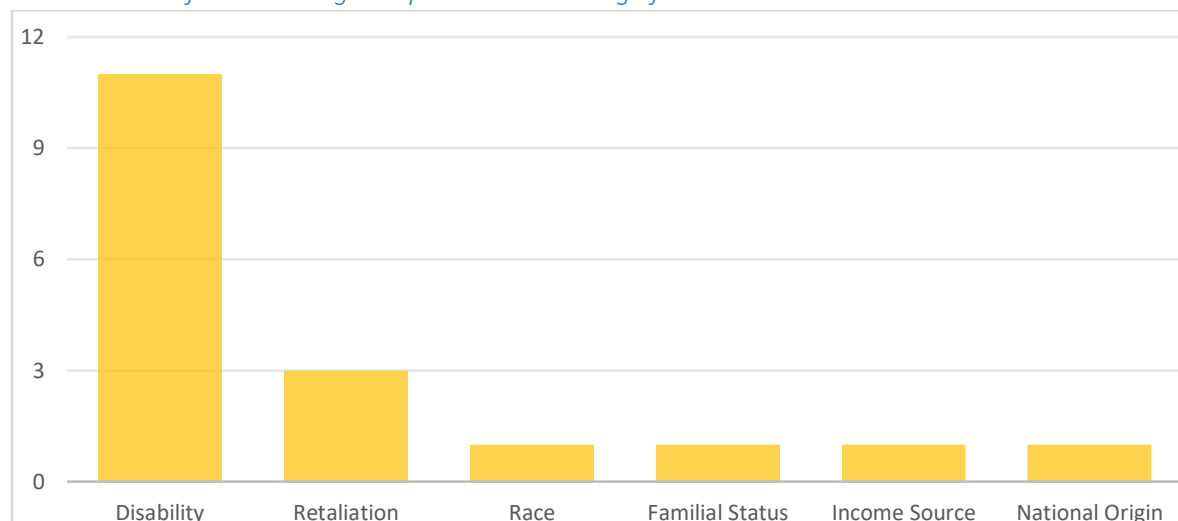
basis of complaint in the city with 11 complaints.

TABLE: Fair Housing Complaints in St. George 2013-2018

Year	Total	Basis
2013	1	Race and Physical Disability (1)
2014	2	Physical Disability (1), Familial Status and Retaliation (1)
2015	1	Mental Disability (1)
2016	3	Mental Disability and Retaliation (1), Physical Disability (1) Income Source and Physical Disability (1)
2017	4	Mental Disability (3) Physical Disability and National Origin (1)
2018	1	Physical Disability and Retaliation (1)
Total	12	

Source: Utah Labor Commission
Data Note: Some cases had more than one basis of complaint.

CHART: Basis of Fair Housing Complaints in St. George from 2013 to 2018



Source: Utah Labor Commission

Data Note: Chart shows the different type of fair housing complaints by basis. Some cases had more than one basis of complaint.

Fair housing complaints based on disability are more evident partially based on the presentation of a dwelling unit. This is easily identifiable partly due to the lack of adequate facilities – meaning housing that has not been adequately adapted to their needs. This basis for complaint is

accompanied by clear, tangible evidence of the discrimination. Generally, because of the needs and accommodations disabled households require, there are fewer options for housing available, and therefore may trigger a higher amount of complaints.

While there could be many reasons why other types of basis of complaints are not as prevalent in the city, proving the validity of a basis for complaint can be difficult. Also, households may simply not/refuse to file a complaint, find other housing, or may not be knowledgeable about how to file a complaint or protection from fair housing laws.

NIMBY (Not in My Backyard)

Opposition by local residents to new developments that may be needed by the overall community, but may be considered unattractive for various reasons is often referred to as NIMBY (Not in My Backyard). In regard to fair housing, NIMBY can create a barrier to the development of certain housing types (e.g. units that are affordable to middle- to low-income residents).

Development of affordable housing is widely seen as a fundamental need for the larger community, however local residents may oppose affordable housing projects for fear that it may have adverse effects on the area, including lowering property values, creating added living costs, and in some cases, increasing crime in the area. The result of protecting the interest of the local residents from adverse effects of new affordable housing development projects is that NIMBY becomes another barrier to fair housing, limiting low-income residents another opportunity to find affordable housing.

In 2013, Steps Recovery introduced a new drug and alcohol addiction recovery center in the Bloomington neighborhood in St. George. Residents opposed the recovery center. The facility was initially proposed to house 24 individuals but was approved for 8. Local residents cited that dropping property values and neighborhood safety were their primary concerns. Other concerns involved the location of the center, which was near an elementary school. The center was again a point of contention in the neighborhood when it expanded from 8 beds to 16 beds in 2017. While this does not directly affect the development of affordable housing in the area, it is closely related. Recovering drug and alcohol addicts are protected by law under the American with Disabilities Act, and also without this service, many recovering individuals may become homeless due to the lack of proper assistance and resources.

Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records⁷

The Fair Housing Act prohibits discrimination in the sale, rental, financing of dwellings and in other housing-related activities on the basis of race, color, religion, sex, disability, familial status or national origin. In April 2016, HUD's Office of General Counsel issued guidance on the discriminatory effect of using criminal history to make housing decisions. If a policy or practice that restricts access to housing on the basis of criminal history has a disparate impact on a protected class (whether or not that effect is intentional), it is in violation of the Fair Housing Act – unless there is a “substantial, legitimate, nondiscriminatory interest” served by the policy.

While it is impossible to know the precise number of people transitioning from a correctional facility at any one point in time, the ability to access safe, secure, and affordable housing is critical for a formerly incarcerated person's reintegration into society. In the most recent Bureau of Justice Statistics report, “Correctional Populations in the United States, 2016” the Bureau estimated Utah had 11,700 incarcerated number in prison or local jail.⁸ In 2014, the St. George Police Department recorded 2,711 arrests. This guidance is intended to eliminate barriers to securing housing for that population, and it is imperative that all jurisdictions make a clear effort to eliminate any discriminatory barriers these individuals may face.

Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity

While the Fair Housing Act prohibits housing discrimination based on race, color, national origin, religion, sex, disability, and familial status (i.e. presence of children in the household), the Act does not specifically include sexual orientation and gender identity as prohibited bases. However, a person's experience with sexual orientation or gender identity housing discrimination may still be covered by the Fair Housing Act. In addition, housing providers that receive HUD funding or have loans insured by the Federal Housing Administration (FHA), as well as lenders insured by FHA, may be subject to “Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity” (2012 Equal Access Rule). This final rule ensures that HUD's housing programs would be open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status.

⁷ U.S. Department of Housing and Urban Development. “Office of General Counsel: Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions,” April 4, 2016.

https://portal.hud.gov/hudportal/documents/huddoc?id=HUD_OGCGuidAppFHASandCR.pdf

⁸ Bureau of Justice Statistics, “Correctional Populations in the United States, 2016”

<https://www.bjs.gov/content/pub/pdf/cpus16.pdf>

In addition, housing providers that receive HUD funding or have loans insured by the Federal Housing Administration (FHA), as well as lenders insured by FHA, may be subject to HUD program regulations intended to ensure equal access of LGBT persons.

As HIV/AIDS disproportionately affects the LGBT community, it is important to note that HIV/AIDS is protected under the Fair Housing Act as a disability. HUD specifically states that housing discrimination because of HIV/AIDS is illegal.

The HUD Office of Policy Development and Research conducted a study in 2013, *An Estimate of Housing Discrimination Against Same-Sex Couples*, as the first large-scale, paired-testing study to assess housing discrimination against same-sex couples in metropolitan rental markets via advertisements on the Internet. Two emails were sent out, with the only difference between the two emails was the sexual orientation of the prospective renting couples. The study finds:

“[... same-sex couples experience less favorable treatment than heterosexual couples in the online rental housing market. The primary form of adverse treatment is that same-sex couples receive significantly fewer responses to e-mail inquiries about advertised units than heterosexual couples. Study results in jurisdictions *with* state-level protections against housing discrimination on the basis of sexual orientation unexpectedly show slightly more adverse treatment of same-sex couples than results in jurisdictions *without* such protections.”⁹

⁹ HUD Office of Policy Development and Research, *An Estimate of Housing Discrimination Against Same-Sex Couples*, June 2013

June 2015 Supreme Court Ruling on Fair Housing

On June 25, 2015 the Supreme Court handed down a landmark fair housing ruling that upheld the ability to bring “disparate impact” claims under Fair Housing Act. The Fair Housing Act of 1968, an integral legislative victory of the Civil Rights Movement, protects people from discrimination when they are renting, buying, or securing financing for housing. The case, *Texas Department of Housing and Community Affairs v. Inclusive Communities Project*, centered on the question of whether a policy or action has to be *intentionally* discriminatory, or merely have a discriminatory *effect*, in order to qualify as a valid basis for a discrimination claim under the Act.

Inclusive Communities, a Dallas-based non-profit, claimed that the Texas Department of Housing and Community Affairs was guilty of housing discrimination because the way in which the state allocated Low Income Housing Tax Credits perpetuated racial segregation by limiting the development of affordable housing into areas that were historically impoverished with high concentrations of minorities. The state claimed that no discrimination occurred because its intention was not to promote racial segregation but to revitalize these underserved areas by injecting much needed capital for the development of new affordable housing. Inclusive Communities claimed that regardless of intention, the state’s decision to fund tax-credit projects only in minority and poverty-laden neighborhoods resulted in segregation, and thus had a discriminatory effect (disparate impact).

Fair housing advocates across the nation watched the case closely and worried if the Supreme Court ruled against disparate impact claims that it would essentially “defang” the Fair Housing Act by removing a key basis for liability. Intent is much harder to prove than effect. In the end the Court ruled 5-4 to uphold the lower court decisions in favor of Inclusive Communities, salvaging fair housing disparate impact claims.

Previously Identified Impediments, 2016 AI

In 2016, the AI was updated to provide emerging impediments to fair housing in the City of St. George. The impediments were found from a thorough review of policies and practices in the public and private sectors, extensive public input, and a detailed examination of social and economic data. These impediments were:

- Lack of sufficient affordable housing options
- Lack of initiatives to affirmatively further fair housing
- Rapid population growth
- A strongly segregated housing market

Impediment 1: Lack of Sufficient Affordable Housing Options

Actions taken to address Impediment 1: The City worked to collaborate with area housing developers who provide additional affordable housing options including mixed use developments, single family and multi-family housing. It continues to promote mixed and various lot sizes in development. It also provided information and technical assistance on housing development programs. There was also support for pre-purchase counseling programs for potential first-time homebuyers.

Impediment 2: Lack of Initiatives to Affirmatively Further Fair Housing

Actions taken to address Impediment 2: It is no longer sufficient for the government to respond after housing problems arise. In order to affirmatively further fair housing, it is incumbent upon the City of St. George to anticipate potential problem areas and proactively seek solutions. Recent HUD guidance suggests broader protections for members of the LGBT community, military personnel, and individuals with a criminal record who may be adversely affected by current fair housing practices. To address this, the City worked to overhaul marketing strategies for all counseling, rehabilitation, and public services. It ensured equal inclusion in housing programs for minorities, the LGBT community, people with a criminal record, and all protected classes in the City of St. George. The city provided technical assistance in affirmative marketing to recipients of city-administered housing development funds. Fair housing training was provided for city government staff, community advocates, housing providers, and financial institutions.

Impediment 3: Rapid Population Growth

Actions taken to address Impediment 3: While the city continues to experience rapid population growth, this growth is not consistent throughout the city geographically. The population density is increasing more rapidly along I-15. This area also boasts the highest poverty rate in the city – a problem that will be compounded if current population growth projections hold true. Along with a rapidly growing population comes a higher demand on the economic, housing, and social services – particularly for the poor, disabled, and elderly. To address this, the city worked to encourage affordable housing developers to build additional units by providing incentives for developing affordable housing within this area. Incentives included density bonuses, fee waivers, planning & permit expediting, and direct financial incentives and subsidies. The city worked to plan and begin conversations to improve the public transportation system, particularly along the I-15 corridor. Finally, the city promoted and supported the incentives for job creation, transportation improvements, and expanded affordable housing development options in areas of high poverty to increase access and opportunities for low-income households.

Impediment 4: A Strongly Segregated Housing Market

Actions taken to address Impediment 4: The City of St. George has some segregated housing markets. To address this impediment the City encouraged development of affordable housing for low- and moderate-income households in high-opportunity neighborhoods. The City also increased development of public infrastructure and public facilities in low wealth, minority concentrated areas to encourage higher opportunities in those neighborhoods. The City continues to encourage mixed-income development in areas with a high concentration of poverty or a single racial group. The City will also undertake any action for affirmatively further fair housing in St. George, such as the development of this AI.

Citizen Participation

This section outlines the Citizen Participation guidelines by the City of St. George and the steps the city takes to involve the public and shareholders in the development of fair housing and HUD programs in St. George.

2019 Fair Housing Survey

The City administered an online survey to gather information about fair housing in St. George. Questions from the survey ranged from demographic information, housing affordability, access to jobs and transportation, to fair housing and discrimination in an effort to gauge the state of fair housing in the city. The fair housing survey was disseminated online in the Spring of 2019 from March 11, 2019 to April 11, 2019. Below are the highlights from the results of the survey.

Overall, 240 people responded to the survey. The participants spanned all age groups over the age of 18 without any particular group being overly represented. Nearly all participants were White (90%) and non-Hispanic (93%), which is consistent with St. George's demographic profile. The largest income group, making up nearly 30% of the responses, was those with a household income of \$50,000-\$74,000. There were 20 respondents whose income was less than \$25,000. Nearly 63% of the survey participants were homeowners.

The results of the survey indicate there is a disconnect with experiencing housing discrimination and reporting that event. Although 67 survey respondents reported having experienced housing discrimination (leading causes are familial status and religion), over the last five years, only 12 complaints were officially filed as previously discussed in the Fair Housing section above. Further education on fair housing rights and violation reporting procedure may benefit the community. Further, fair housing campaign efforts could help promote owner and landlord responsibilities and legal requirements for promoting and ensuring fair housing opportunities. The majority of survey reported discrimination is in the rental markets.

Citizen Participation Plan

The City of St. George adheres to its Citizen Participation Plan adopted in April 2016. In accordance with that plan, the city of St. George hosts training sessions, attends neighborhood outreach meetings, holds public meetings and hearings, places copies of various CDBG plans and reports on the city's website, makes copies of the plans available for review in both draft and final forms, and accepts and incorporates citizen input and feedback. Along with the annual processes, the public is advised of all program planning activities, actions, and plan amendments by published notices, the city's website, and personal mailings as appropriate. In order to

improve program outcomes, the City of St. George also collaborates and cooperates with other governmental agencies, as well as a number of profit and non-profit organizations, to develop viable program activities. For all CDBG activities, the City of St. George works to provide full accessibility for the disabled, and provides translation and hearing-impaired services for those who request them.

As stated in the St. George Citizen Participation Plan: Citizen Participation must be an integral part of the planning process for the Consolidated Submission for all Community Planning and Development Programs (CPD). Much of the citizen participation process involves scheduling, publicizing and conducting meetings/hearings. HUD, in its attempt to assure adequate opportunity for participation by program beneficiaries, has prescribed minimum Citizen Participation, plan submission, performance, and record maintenance requirements. The City adheres to these requirements.

The CDBG Program is administered by the Community Development Department of the City of St. George. The local citizen participation process generally includes a yearly series of well-advertised community/neighborhood public meetings held at city hall to review the Annual Action Plan and the Consolidated Annual Performance Evaluation Report as well as any amendments or changes to the Consolidated Plan and/or the Assessment of Fair Housing (AFH). All meetings/hearings are advertised in accordance with applicable HUD, state and local regulations. Public notices for environmental procedures and project related purposes are also part of the citizen participation process.

The City of St. George will also consult with other public and private agencies that provide assisted housing, health services, and social services, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. The city will also consult with community-based and regionally-based organizations that represent protected class members and organizations that enforce fair housing laws when preparing both the Consolidated Plan and the AFH, including participants in the Fair Housing Assistance Program, Fair Housing organizations, nonprofit organizations that receive funding under the Fair Housing Initiative Program, and other public and private fair housing service agencies, to the extent that such entities operate within the jurisdiction. Additionally, the consultation process will include consultation with regional government agencies in addition to adjacent units of general local government and local government agencies. This includes local government agencies with metropolitan-wide planning and transportation responsibilities, partially for problems and solutions that go beyond the city's jurisdiction.

Current Impediments and Recommendations

The following includes the list of impediments found to be barriers to fair housing choice in St. George. By no means is this an exhaustive list of all impediments that may affect the city. However, this list is an attempt to outline impediments that were found during the development of this AI using various data sources and extensive community input. Each major impediment is summarized on the following pages, along with a brief overview of the existing conditions surrounding each issue and proposed implementation strategies to address identified impediments.

Impediment 1: There is a lack of fair housing programs in St. George

St. George does not currently have a local fair housing agency or program that can assist residents. This absence minimizes planning efforts and strategic coordination to further fair and affordable housing, especially to low- and moderate-income people and households. The lack of an engaged outreach program limits the education and counseling services that could be rendered to improve citizen's understanding of legal rights and to assist in fair housing choice. By partnering with fair housing organizations, St. George can expand its ability to access local data and knowledge that will be useful in fair housing planning and best practices.

Strategies:

- I. Identify existing agencies that have aligned mission and capacity to expand its resources.
- II. Partner with local service provider(s) to establish unified vision and provide collaborative training.
- III. Support funding initiatives to expand fair housing program's establishment and operations.

Outcome Measures:

- I. Establishment of a fair housing program or an expanded mission to a currently operating local service provider.
- II. Increased fair housing campaigns that include education, counseling to the community, landlords, and other stakeholders.

Impediment 2: Limited affordable housing in St. George

A population increase in St. George has put a strain on the housing market, placing a higher burden on low- to moderate-income households. Housing costs are increasing at a rapid pace and income has not kept pace. Median home values for owner-occupied homes increased by nearly 56% from 2000 to 2016. Median rents during this period increased by 56%. Stagnant or fixed incomes have limited people's housing choice and caused more to become housing cost-burdened. Over 35% of homeowners with a mortgage are cost-burdened in St. George. Renters in the City have the highest rate of cost burden at 52.9%. Further, there are fewer rental units available for lower rent cohorts, but an increase in units with higher rent cohorts. More affordable housing options should be made available with an increase in production. Developers need better incentives to reduce costs and encourage affordable housing.

Strategies:

- I. Explore alternatives to decrease development costs to encourage affordable developments.
- II. Provide funding for or identify additional funding sources for affordable housing development and rehabilitation programs.
- III. Support pre-purchase counseling programs for potential first-time homebuyers.

Outcome Measures:

- I. Increased number of affordable housing units developed.
- II. Increased funding for the development of affordable housing in the City.

Impediment 3: Lack of state or local fair housing laws

The Fair Housing Act prohibits discrimination in housing due to race, color, national origin, religion, sex, familial status, and disability. While this Act helps protect St. George's residents from discrimination, it would be beneficial for local legislation to reflect or expand upon the Fair Housing Act. HUD recommends including additional protections for groups that typically face discrimination through local laws prohibiting housing discrimination based on sexual orientation and gender identity, language spoken at home, former incarceration, and income source.

Strategies:

- I. Explore legislative options to support/expand groups protected by the Fair Housing Act.

II. Provide support for local organizations that advocate on behalf of groups that regularly face discrimination.

III. Educate members of the community about their rights and the needs of groups that regularly face discrimination.

Outcome Measures:

I. Local legislation that supports or expands the Fair Housing Act.

II. Increased communication and work with local organizations and landlords.

III. Increased number of landlords willing to accept Section 8 Housing Choice Vouchers and/or similar rental subsidies.

Impediment 4: Lack of Public Resources in Spanish

Currently, over 13% of the City's population identifies as Hispanic, most of whom primarily speak Spanish at home. Hispanic residents have significantly higher rates of poverty and lower household incomes than White residents. City resources are not available online or easily acquired in Spanish which can often prevent access. It is very likely that the number of Hispanic residents will continue to increase in the City and it is imperative that resources are available to support their access to fair housing.

Strategies:

I. Provide written translation of the government website and all vital documents to Spanish in accordance with Title VI Limited-English Language obligations.

II. Develop and implement an outreach strategy to educate the Hispanic population about their housing rights and resources available.

Outcome Measures:

I. Participation in government programs by Hispanic residents that matches their representation in the population as a whole.

II. Increased communication and support with local organizations and leaders of the Hispanic community.