

West Jordan: Fair Housing Equity Assessment

Prepared by

Bureau of Economic and Business Research
David Eccles School of Business
University of Utah

James Wood
John Downen
DJ Benway
Darius Li

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SUMMARY OF FAIR HOUSING EQUITY ASSESSMENT

Background

- While minorities accounted for 26 percent of the city's net population growth from 1990 to 2000, they constituted nearly 44 percent of the city's growth in the following decade. For this reason, the non-Hispanic white share of the city population declined from 91 percent in 1990 to 75 percent in 2010, despite nearly doubling in size during this period.
- While the non-Hispanic white average household size decreased from 3.8 in 1990 to 3.3 in 2010, the Hispanic average household size increased from 3.6 to 4.2 during this period.

Segregation

- Non-Hispanic white homeownership rates have been at levels of 80 percent from 1990 to 2010. On the other hand, minority homeownership rates decreased from 73 percent in 1990 to 63 percent in 2010.
- More than one-fifth of minority rental units are in the new neighborhoods on the west side between 7800 South and New Bingham Highway. However, there are virtually no bus routes on the west side of the city.

RCAP/ECAP

- The overall poverty rate in West Jordan in 2010 was about 6 percent. A minority resident was three as likely to be poor as a non-Hispanic white resident and comprised about 44 percent of the total poor in the city.
- The city has no racially or ethnically concentrated areas of poverty, and only one tract where Hispanics are more than 10 percentage points above the county average, which it shares with Kearns. Similarly, the eastern boundary of West Jordan is adjacent to Midvale, which has high concentrations of minorities.

Disparities in Opportunity

- HUD provided an opportunity index that aggregated a variety of factors such as school proficiency, job access, poverty, and housing stability. Overall, West Jordan's score was close to the county average score of 4.5. However, the opportunity within the city varies greatly depending on the location. The public schools also aggregate to score average rankings in the county, but also vary greatly within the city itself.
- The assessed single-family home values in the city are also mid-range, with much variation within the city. Though the median home value of a tract tends to be higher on the west side, the individual homes tend to follow a similar geographic pattern as the poor residents living in West Jordan.
- From 2006 to 2011, the mortgage approval rates for non-Hispanic white applicants were near or above 70 percent for all income levels. However, the Hispanic approval rate ranged from 45 percent for the lowest income level (below \$35,000/year) to 60 percent for the highest income bracket (above \$173,000/year).

FAIR HOUSING EQUITY ASSESSMENT ANALYSIS

In recent decades West Jordan has seen large population growth, in part due to new home construction in recent years. Much like the rest of the county, the minority populations are increasing at a rate higher than that of non-Hispanic whites. Almost half of the population growth between 2000 and 2010 was attributed to minorities. However, the minority growth is not consistent across all income levels or geographic location in the city. Though non-Hispanic white homeownership rates have remained about 80 percent in the last two decades, minority homeownership rates have decreased for 73 percent in 1990 to about 63 percent in 2010. Therefore, more minority households are renting, and more than one-fifth of them are in the new neighborhoods on the west side of West Jordan between 7800 South and New Bingham Highway. However, there are virtually no bus routes on the west side of the city. This creates potential difficulties in commuting to large low-wage employment centers such as the South Valley Regional Airport. Although the TRAX line does service several locations in the southeastern part of the city, but this area has relatively few low-wage opportunities and low concentrations of minority households.

The impediments to housing opportunities for minorities have increased as a result of changing demographics. While the city average household size decreased from 3.8 in 1990 to 3.5 in 2010, the Hispanic average household increased from 3.6 to 4.2 during this period. Pacific Islander households consistently averaged more than five members during this period. The large average household sizes among Hispanics/Latinos and Pacific Islanders could pose several housing impediments, including the difficulty in locating rental units with enough bedrooms and potentially large rental cost burden resulting from suitable rental units. Additional housing impediments arise from mortgage lending practices in the county. While non-Hispanic whites hold an approval rate of 70 percent for nearly all income levels from 2006 to 2011, the approval rate for Hispanics has been highly dependent on income. Even at the highest income levels, the approval rate between the two groups has not closed. Furthermore, even when Hispanics do receive approvals on mortgages, they face the possibility of unfair lending practices. Nearly 38 percent of the approved loans for Hispanic applicants from 2006 to 2011 were considered high interest—more than triple the rate for non-Hispanic white applicants. High-interest loans could be a precursor to foreclosures, thereby decreasing housing stability.

In addition to public transit improvements in the city, West Jordan could benefit from the open space and additional zoning changes that are possible in the city. In addition to the open space on the west side which can be developed for many purposes including commercial to residential areas, the city could also benefit from mixed-use zoning and increased transportation options and infrastructure. Through multi-use zoning, micro-urban centers can be developed in areas lacking major public transportation options. This can create a more focused economic center of commercial activity with low-wage jobs and other amenities. A city master plan that includes mixed housing would improve the housing options for low-income renter households in West Jordan earning below 50 percent of the area median family income, of which the housing stock is considered extremely unaffordable. With many smaller neighborhood centers of both residential and commercial activity, new bus routes, bike lanes and walking routes can be focused to these areas. This will help ensure that directed bus routes and transit options are available in the areas of highest need, creating less of a burden on households of protected classes.

BACKGROUND

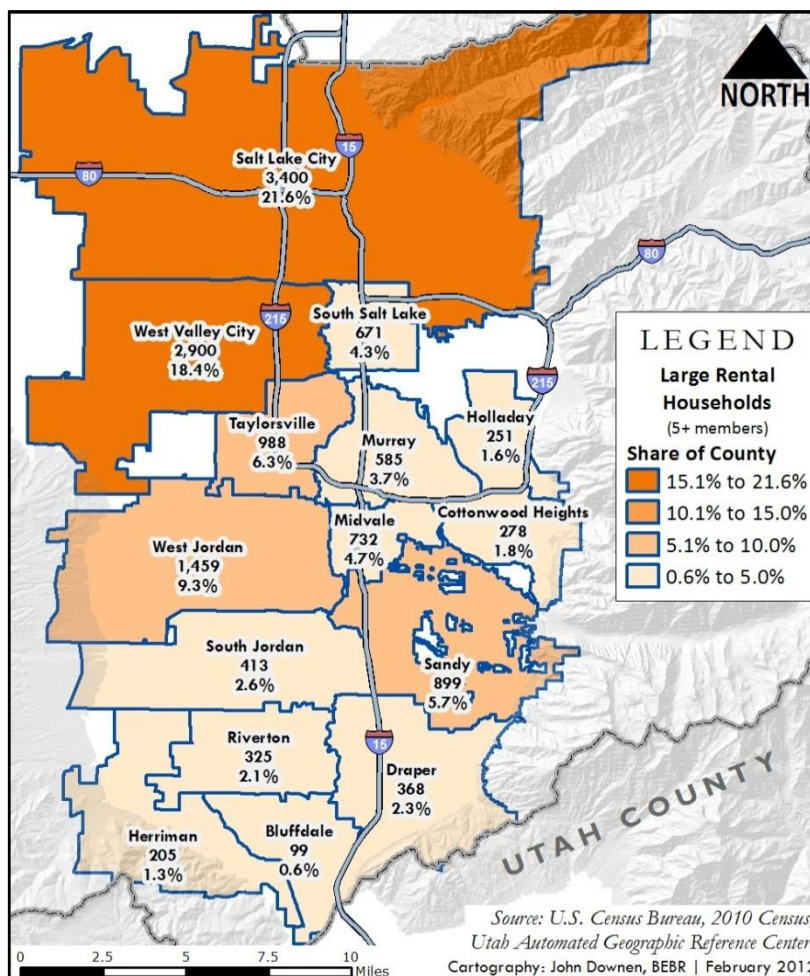
With recent residential development on the west side of West Jordan, the city has more than doubled its population since 1990. Recent minority growth in the last decade has been concentrated near the South Valley Regional Airport and new residential developments on the west side. These areas not only have large shares of minority rental and owner-occupied units but also the largest number of low-wage jobs in the city. However, the city has virtually no public transportation on the developing west side, creating potential difficulties in commuting to employment centers.

Table 1 shows selected demographic trends in West Jordan from 1990 to 2010. The non-Hispanic white share of the city's population declined from over 90 percent in 1990 to under 75 percent in 2010. Even though the non-Hispanic white population doubled during this time period, the Hispanic/Latino population experienced nearly a seven-fold increase from 1990 to 2010, now constituting nearly 18 percent of the population.

While the share of households with children under 18 decreased from 70 percent in 1990 to 55 percent in 2010, the share of households with persons 65 and over increased from 7.5 percent in 1990 to 12 percent in 2010. Single-parent households with children increased by 80 percent from 2000 to 2010—nearly twice the percent change from the previous decade.

Figure 1 shows each city's share of Salt Lake County's large rental households, which are defined as having five or more persons. Over 9 percent of large rental households reside in West Jordan. The six entitlement cities—Salt Lake City, West Valley, Taylorsville, West Jordan, Sandy, and South Jordan—constitute nearly 64 percent of the county's large rental households. The non-entitlement cities in the southern and eastern regions of the county each have very minimal county shares. Although not pictured in Figure 1, the unincorporated areas are home to nearly 14 percent of the county's large rental households.

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



**Table 1
Demographic Trends for Protected Classes
West Jordan, 1990–2010**

	1990		2000		2010	
	Count	Share	Count	Share	Count	Share
Total Population	42,892		68,336		103,712	
White (not Hispanic)	38,947	90.8%	57,688	84.4%	77,360	74.6%
Black (not Hispanic)	99	0.2%	396	0.6%	855	0.8%
Asian ¹	588	1.4%	1,381	2.0%	2,732	2.6%
Hispanic/Latino	2,784	6.5%	6,882	10.1%	18,364	17.7%
Minority (all except non-Hispanic white)	3,945	9.2%	10,648	15.6%	26,352	25.4%
Persons with disabilities ²	—	—	7,986 ± 429	13.3% ± 0.7%	6,344 ± 662	6.8% ± 0.7%
Total Households	11,143		18,897		29,849	
Households with Children under 18 years	7,751	69.6%	11,542	61.1%	16,281	54.5%
Households with Persons 65 years or over	841	7.5%	1,530	8.1%	3,582	12.0%
Single Parent with Children under 18 years	1,239	11.1%	1,741	9.2%	3,140	10.5%
Large Families (5 or more persons)	3,748	33.6%	5,209	27.6%	7,746	26.0%
Owner-occupied Housing Units	8,777	78.8%	15,478	81.9%	23,024	77.1%
Renter-occupied Housing Units	2,366	21.2%	3,419	18.1%	6,825	22.9%

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

² The disability data account for only the population ages 5 and older, since Census 2000 did not gather disability data on the population under 5. The 2010 data was derived from the 2009-2011 American Community Survey 3-year estimates by aggregating only the age groups older than 5. The margins of error for the disability data are associated with 90% confidence intervals. The margin of error for the 2010 data was recalculated to account for only the population ages 5 and older. The margin of error for the 2000 data was calculated using the methodology described in the Census 2000 Summary File 3 Technical Documentation. Despite these adjustments to make the 2000 and 2010 data encompass the same age groups, these two data points are not comparable given changes in survey design and revisions in the definition of disability.

Source: U.S. Census Bureau

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

	1990– 2000	2000– 2010
Total Population	25,444	35,376
White (not Hispanic)	18,741	19,672
Black (not Hispanic)	297	459
Asian (not Hispanic)	793	1,351
Hispanic/Latino	4,098	11,482
Minority	6,703	15,704
Total Households	7,754	10,952
Households with Children <18	3,791	4,739
Households with Persons 65+	689	2,052
Single Parent with Children < 18	502	1,399
Large Families (5+ persons)	1,461	2,537
Owner-occupied Housing Units	6,701	7,546
Renter-occupied Housing Units	1,053	3,406

Source: U.S. Census Bureau

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

	1990– 2000	2000– 2010
Total Population	59.3%	51.8%
White (not Hispanic)	48.1%	34.1%
Black (not Hispanic)	300.0%	115.9%
Asian (not Hispanic)	134.9%	97.8%
Hispanic/Latino	147.2%	166.8%
Minority	169.9%	147.5%
Total Households	69.6%	58.0%
Households with Children <18	48.9%	41.1%
Households with Persons 65+	81.9%	134.1%
Single Parent with Children < 18	40.5%	80.4%
Large Families (5+ persons)	39.0%	48.7%
Owner-occupied Housing Units	76.3%	48.8%
Renter-occupied Housing Units	44.5%	99.6%

Source: U.S. Census Bureau

Table 4 lists the average household sizes in West Jordan by race and ethnicity. The citywide average household size steadily decreased from 3.82 in 1990 to 3.46 in 2010. Despite this overall downward trend, the average household size for Hispanics/Latinos increased from 3.63 in 1990 to 4.15 in 2010. The average household size for Pacific Islanders has hovered around 5.4 in the past 20 years. While many minority groups had average household sizes in 1990 and 2000 that exceeded four members, Hispanics/Latinos and Pacific Islanders were the only remaining racial and ethnic groups above this threshold in 2010.

The higher average household sizes among minority groups could pose difficulties in finding affordable and suitable rental locations as well as higher rent burdens. Thus, limited selection and affordability of rental units with three or more bedrooms could disproportionately affect minority groups, especially Hispanics/Latinos and Pacific Islanders.

Table 4
Average Household Size by Race/Ethnicity in West Jordan, 1990–2010

Race/Ethnicity	1990¹	2000	2010
White (not Hispanic)	3.82	3.53	3.30
Hispanic/Latino	3.63	4.12	4.15
American Indian (not Hispanic)	4.34	3.51	3.65
Asian/Pacific Islander (not Hispanic)	4.24	4.41	4.17
Asian ²	3.87	4.05	3.66
Pacific Islander ²	5.41	5.34	5.40
Black (not Hispanic)	3.21 ⁵	3.50	3.18
Other Race (not Hispanic)	2.67 ⁵	— ⁴	3.31
Two or More Races (not Hispanic)	— ³	3.20	3.88
Total Population	3.82	3.60	3.46

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

² The 1990 Census Summary Tape File 2B does not further disaggregate Asian and Pacific Islander populations by Hispanic origin. However, this lack of detailed disaggregation in the census raw data only overcounts the total number of households in Salt Lake County by 91, given the relatively few Hispanic Asians and Hispanic Pacific Islanders in the total population. Note that the Asian and Pacific Islander categories for 2000 and 2010 are non-Hispanic given the availability of disaggregation by Hispanic origin for these two races in the last two censuses to avoid overlap with the Hispanic/Latino population.

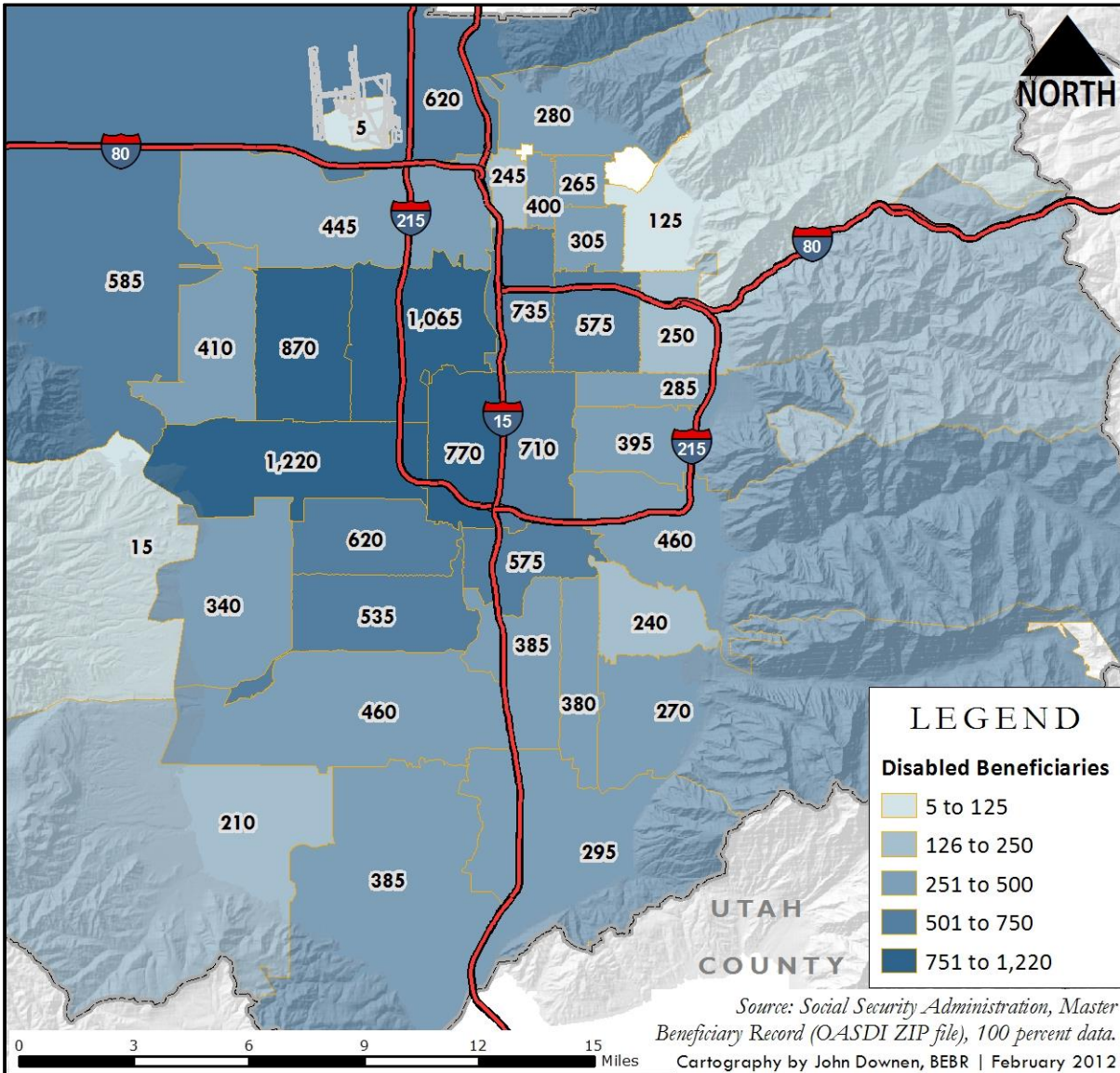
³ The 1990 Census did not include “Two or More Races” as an option for race.

⁴ The 2000 and 2010 Census did not provide average household sizes for these groups due to low numbers of households.

⁵ These groups have fewer than 30 households. Please refer to the exact number of households for these groups in Table 7.

Source: U.S. Census Bureau

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



The number of disabled social security disability beneficiaries in Salt Lake County is shown in Figure 2 at the zip code level. The beneficiaries are heavily concentrated in West Valley City, Taylorsville, and Kearns as well as parts of South Salt Lake and Murray. Though West Jordan does not have as extreme numbers of Social Security beneficiaries, it still has more than many of the southern and eastern zip codes in the county.

SEGREGATION

Homeownership rates in West Jordan peaked at 82 percent in 2000, falling slightly below 1990 levels in 2010 (Table 5). While non-Hispanic whites, Hispanics/Latinos, and non-Hispanic minorities all had homeownership rates above 70 percent in 1990, this indicator has diverged between non-Hispanic whites and minorities in the following two decades. Non-Hispanic white homeownership rates reached nearly 81 percent in 2010, while minority homeownership rates decreased to below 63 percent in 2010. Asians were the only minority group in 2010 to have homeownership rates comparable to those of non-Hispanic whites.

Table 5
Homeownership Rate by Race/Ethnicity
West Jordan, 1990–2010

Race and Ethnicity	1990	2000	2010
White (not Hispanic)	79.3%	83.4%	80.6%
Minority	73.1%	71.4%	62.8%
Hispanic/Latino	74.2%	70.6%	61.7%
Non-Hispanic Minority	70.1%	73.0%	65.4%
American Indian	— ²	— ²	58.1%
Asian or Pacific Islander	73.7%	80.0%	69.8%
Asian	— ¹	83.8%	79.5%
Pacific Islander	— ¹	70.2%	46.6%
Black	— ²	60.2%	48.9%
Other Race	— ²	— ²	— ²
Two or More Races	— ¹	67.7%	63.6%
Total	78.8%	81.9%	77.1%

Source: U.S. Census Bureau

Table 6
Rental Tenure Rate by Race/Ethnicity
West Jordan, 1990–2010

Race and Ethnicity	1990	2000	2010
White (not Hispanic)	20.7%	16.6%	19.4%
Minority	26.9%	28.6%	37.2%
Hispanic/Latino	25.8%	29.4%	38.3%
Non-Hispanic Minority	29.9%	27.0%	34.6%
American Indian	— ²	— ²	41.9%
Asian or Pacific Islander	26.3%	20.0%	30.2%
Asian	— ¹	16.2%	20.5%
Pacific Islander	— ¹	29.8%	53.4%
Black	— ²	39.8%	51.1%
Other Race	— ²	— ²	— ²
Two or More Races	— ¹	32.3%	36.4%
Total	21.2%	18.1%	22.9%

Source: U.S. Census Bureau

¹ The 1990 Census did not further disaggregate Asian or Pacific Islander into separate groups for tenure data. In addition, the 1990 Census did not include multiple races as an option.

² All homeownership and rental tenure rates are not listed for any racial or ethnic group with fewer than 100 households.

Table 7 and Table 8 include the composition of total households and rental households, respectively, by race and ethnicity. The non-Hispanic white share of rental households in West Jordan has become increasingly lower than the share of total households. In 1990, 89 percent of total rental households in West Jordan were headed by non-Hispanic whites, fairly commensurate with the 91 percent non-Hispanic white share of total households. However, in 2010, while the non-Hispanic white share of total households decreased to 80.5 percent, the non-Hispanic white share of rental households constituted a much smaller 68 percent. This means that the rental composition by race and ethnicity has diverged from the overall household demographics in West Jordan. Minorities now represent slightly over 30 percent of all rental households yet only comprise a fifth of the total households in the city.

**Table 7
Total Households by Race and Ethnicity
West Jordan, 1990–2010**

Race and Ethnicity	1990		2000		2010	
	Number of Households	% Share	Number of Households	% Share	Number of Households	% Share
White (not Hispanic)	10,177	91.3%	16,512	87.4%	24,026	80.5%
Minority	966	8.7%	2,385	12.6%	5,823	19.5%
Hispanic/Latino	698	6.3%	1,556	8.2%	4,131	13.8%
Non-Hispanic Minority	268	2.4%	829	4.4%	1,692	5.7%
American Indian	50	0.4%	84	0.4%	124	0.4%
Asian or Pacific Islander	186	1.7%	471	2.5%	1,032	3.5%
Asian	—	—	340	1.8%	727	2.4%
Pacific Islander	—	—	131	0.7%	305	1.0%
Black	29	0.3%	103	0.5%	221	0.7%
Other Race	3	0.0%	7	0.0%	32	0.1%
Two or More Races	—	—	164	0.9%	283	0.9%
Total	11,143	100.0%	18,897	100.0%	29,849	100.0%

Source: U.S. Census Bureau

Note: For the 1990 data, the number of households by race and ethnicity of householder is not further disaggregated to distinguish between Asian and Pacific Islander.

**Table 8
Rental Households by Race and Ethnicity
West Jordan, 1990–2010**

Race and Ethnicity	1990		2000		2010	
	Number of Households	% Share	Number of Households	% Share	Number of Households	% Share
White (not Hispanic)	2,106	89.0%	2,738	80.1%	4,657	68.2%
Minority	260	11.0%	681	19.9%	2,168	31.8%
Hispanic/Latino	180	7.6%	457	13.4%	1,582	23.2%
Non-Hispanic Minority	80	3.4%	224	6.6%	586	8.6%
American Indian	17	0.7%	33	1.0%	52	0.8%
Asian or Pacific Islander	49	2.1%	94	2.7%	312	4.6%
Asian	—	—	55	1.6%	149	2.2%
Pacific Islander	—	—	39	1.1%	163	2.4%
Black	13	0.5%	41	1.2%	113	1.7%
Other Race	1	0.0%	3	0.1%	6	0.1%
Two or More Races	—	—	53	1.6%	103	1.5%
Total	2,366	100.0%	3,419	100.0%	6,825	100.0%

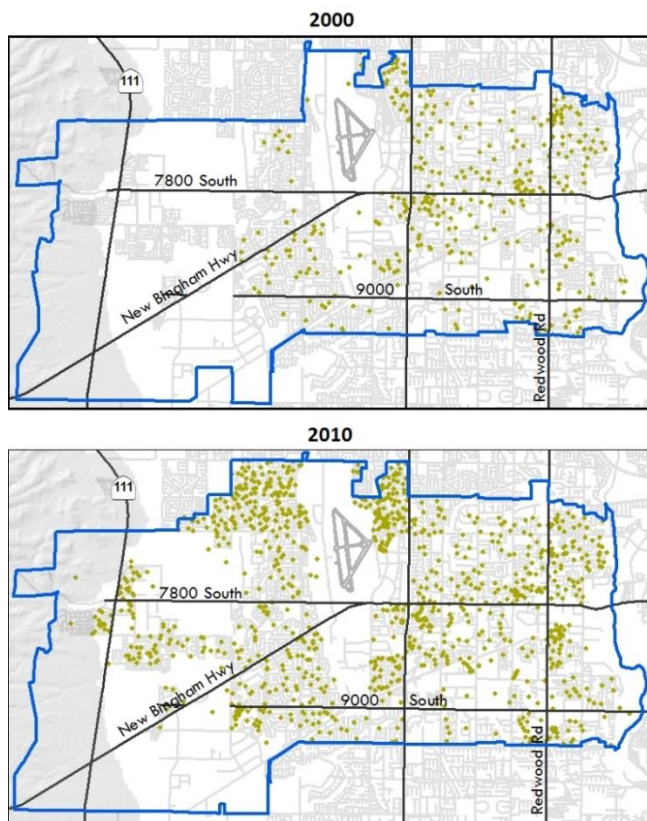
Source: U.S. Census Bureau

Note: For the 1990 data, the number of households by race and ethnicity of householder is not further disaggregated to distinguish between Asian and Pacific Islander.

Figure 3 shows West Jordan’s minority population densities in 2000 and 2010. The west side of the city has seen rapid minority growth from 2000 to 2010 given the recent developments of this area. The minority population has grown rapidly near the South Valley Regional Airport since 2000.

The 2010 map of Figure 3 is denser than the 2000 panel, meaning that the minority population growth has intensified in the last decade. As shown in Figure 4, while very few census tracts had minority shares over 20 percent in 2000, nearly all the census tracts to the west of the airport and the easternmost census tracts have minority shares over 25 percent in 2010. Note that the 2000 census tract containing the airport (represented as a triangular structure in Figure 4) and the census tract between 7800 South and New Bingham Highway have merged into one 2010 census tract.

Figure 3
Minority Population Concentrations
in West Jordan, 2000 and 2010

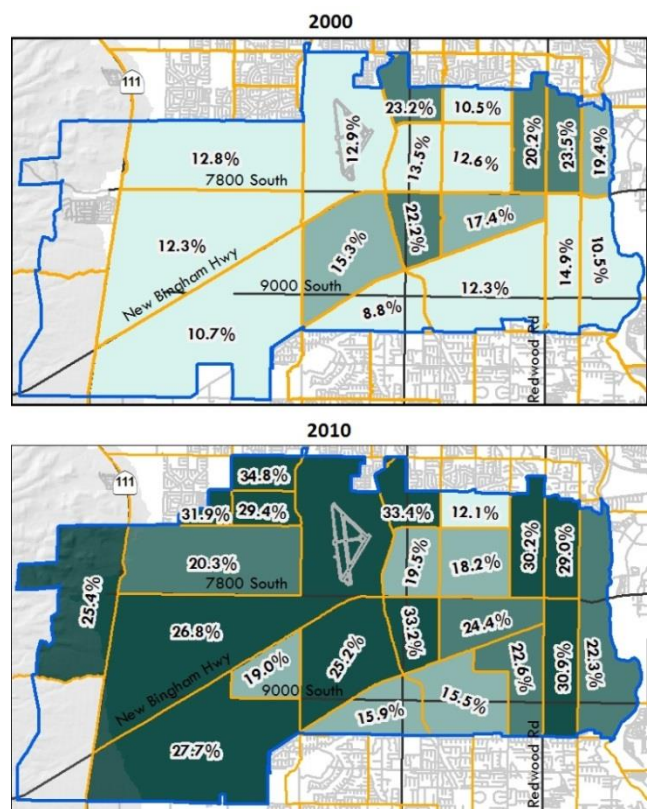


LEGEND

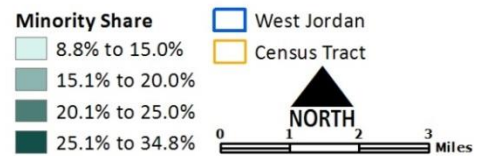


Note: City boundaries and some census block boundaries changed between 2000 and 2010.

Figure 4
Percent of Minority Population by Tract
in West Jordan, 2000 and 2010



LEGEND



Note: City boundaries and some census tract boundaries changed between 2000 and 2010.

Source: U.S. Census Bureau, 2000 and 2010 Censuses;
 Utah Automated Geographic Reference Center.
 Cartography: John Downen, BEBR | February 2012

Source: U.S. Census Bureau, 2000 and 2010 Censuses;
 Utah Automated Geographic Reference Center.
 Cartography: John Downen, BEBR
 January 2012

Figure 5
Minority Owner-Occupied Units in West Jordan, 2010

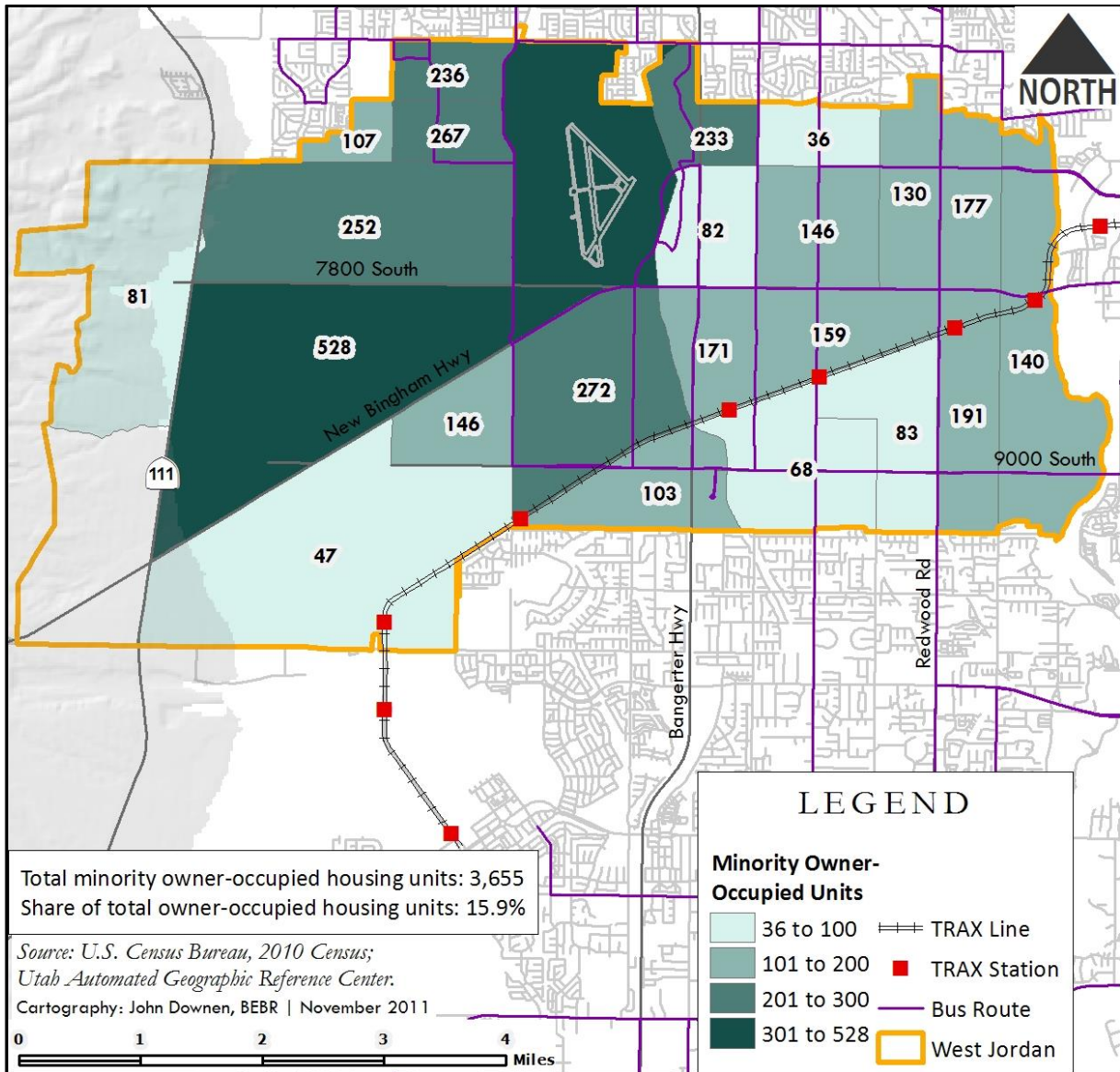


Figure 5 shows the number of minority occupied units by census tracts in West Jordan. The census tracts to the west of the airport have the most minority owner-occupied units (Figure 5). Note that the census tract containing the airport has 528 minority owner-occupied units, most of which are in the new residential developments to the southwest of the airport between 7800 South and New Bingham Highway (Figure 5).

Figure 6
Share of Owner-Occupied Units in West Jordan
Occupied by Minority Households, 2010

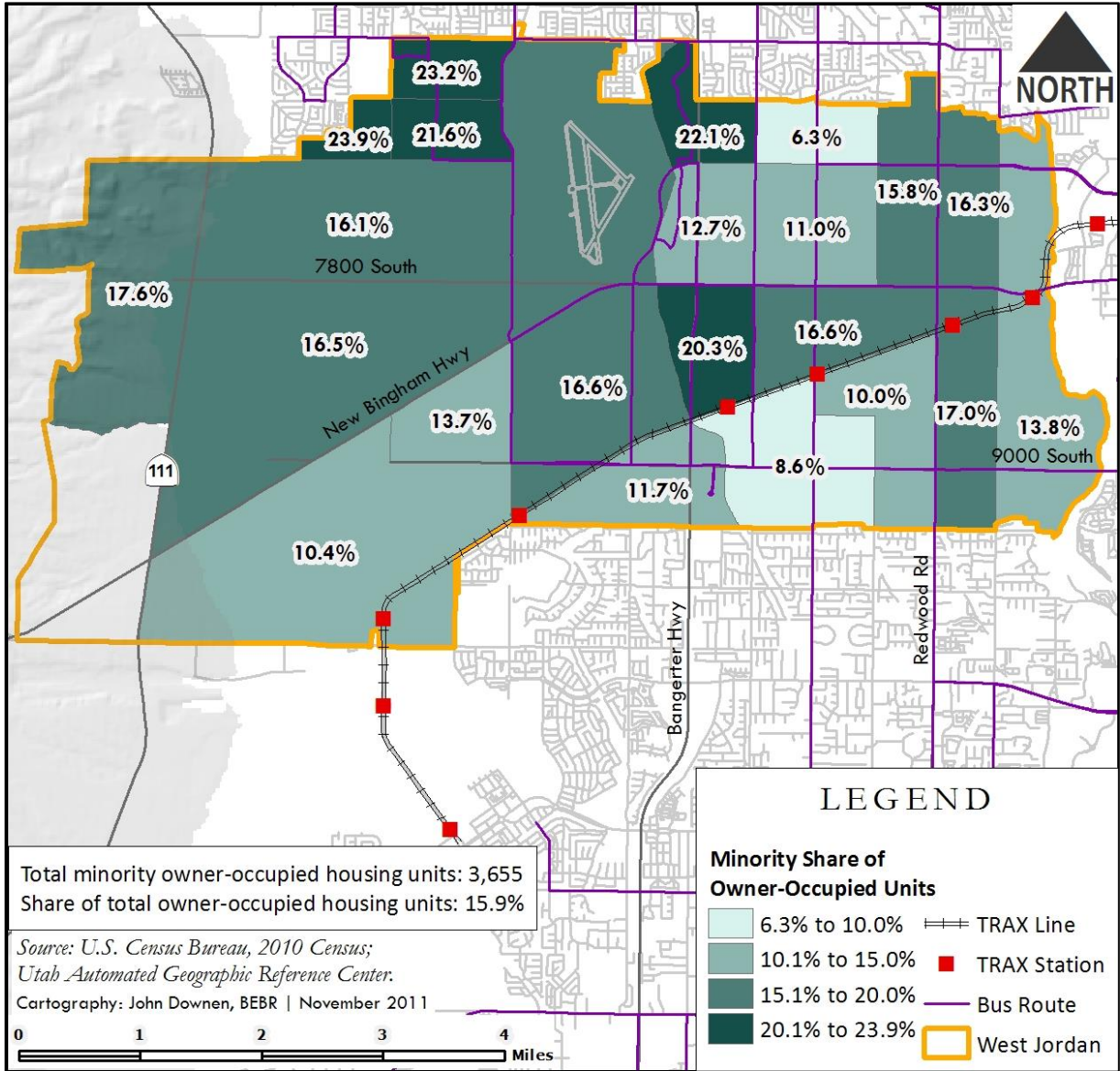


Figure 6 provides the percent of owner-occupied units that are minority households. Four census tracts—three bordering the northwest corner of the airport and another one next to the northeast side—have the highest minority shares of owner-occupied units in the city (Figure 6).

Figure 7
Minority Owner-Occupied Units and Proximity to Low-Wage Jobs in West Jordan, 2010

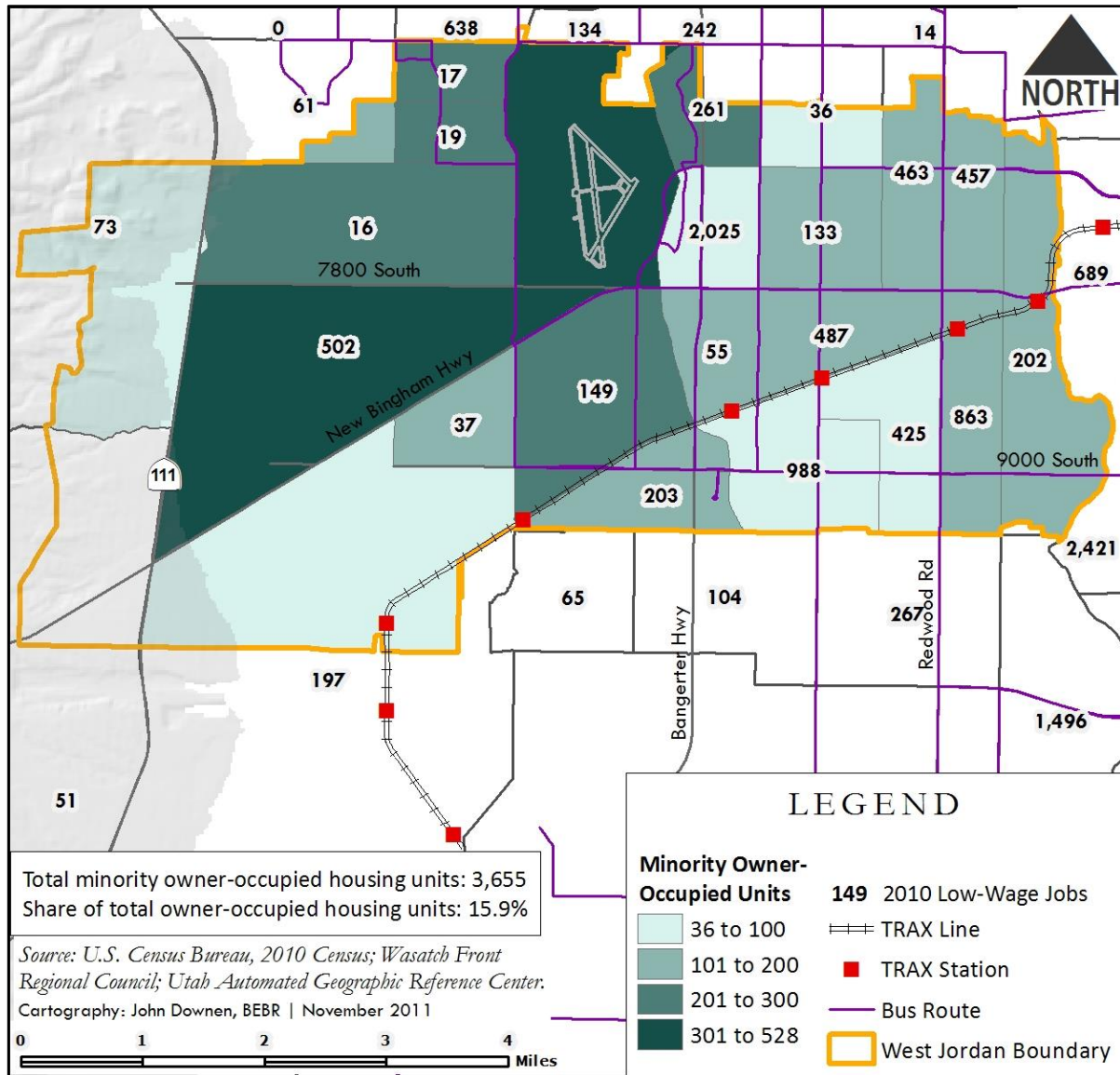


Figure 7 overlays the density of minority owner-occupied units (in shades of green) with the number of low-wage jobs. The purple lines in Figure 7 represent the bus routes in the city. Most of the low-wage jobs are at or near the South Valley Regional Airport. The census tract east of the airport has over 2,000 low-wage jobs, mostly in retail stores and restaurants in this area. The TRAX line runs through the southeast region of the city, where there are relatively few low-wage jobs and low minority density of homeownership. Even though the concentration of low-wage jobs and minority owner-occupied households are in the areas surrounding the airport, there is virtually no public transportation on the newly developing west side of the city, making it difficult to reach employment centers at or near the airport.

Figure 8
Minority Renter-Occupied Units by Tract in West Jordan, 2010

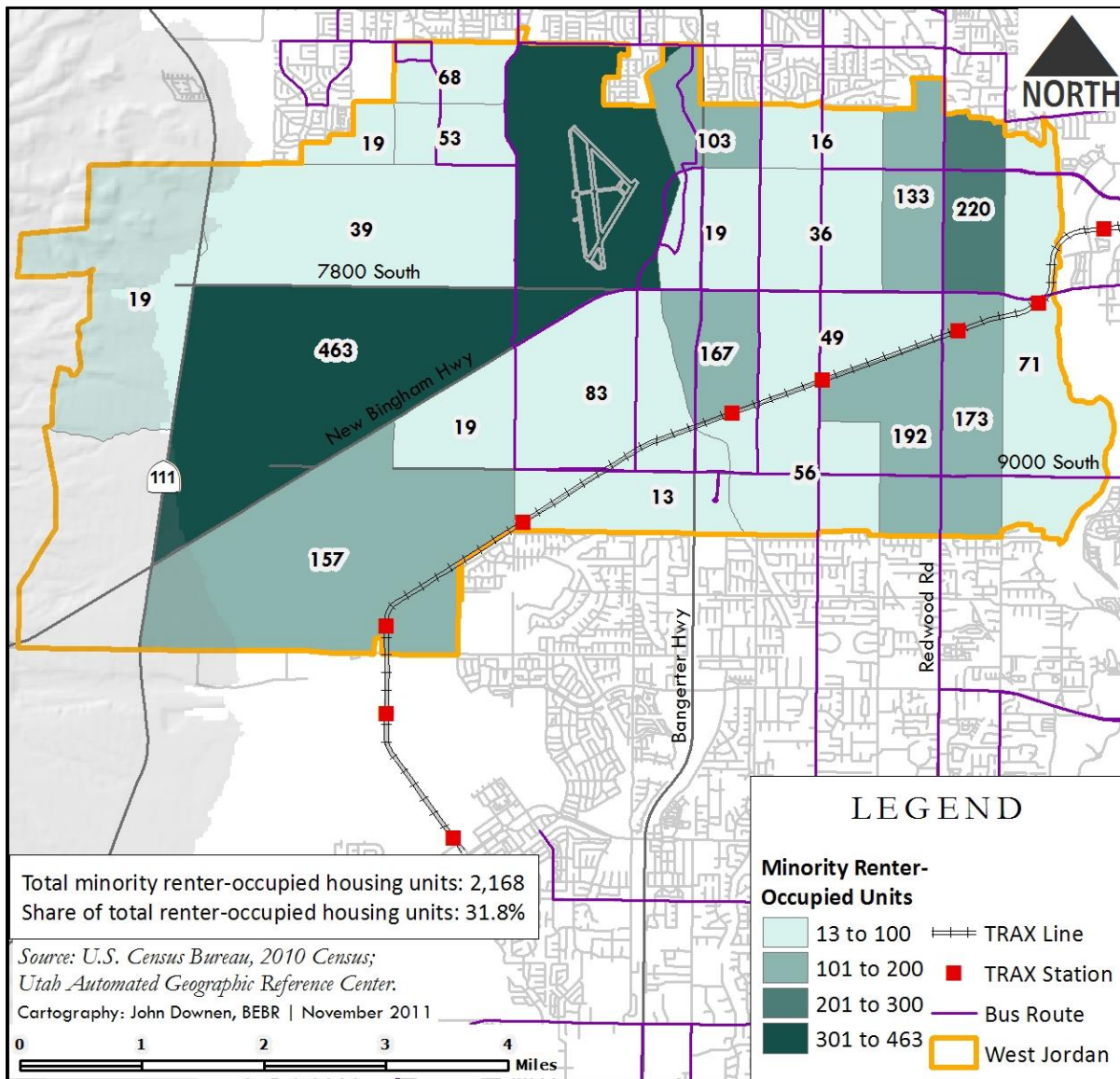


Figure 8 shows the number of minority renter-occupied units in West Jordan. While the minority owner-occupied units are concentrated in several census tracts surrounding the airport (Figure 5), minority renter-occupied units are mostly situated in the newly developing residential areas southwest of the airport. This concentration is almost identical to the distribution of minority owner-occupied homes (Figure 5). This could be due to a variety of factors including, but not limited to: self-selection bias, lack of affordable housing, or systematic discrimination.

Figure 9
Minority Share of Renter-Occupied Units by Tract in West Jordan, 2010

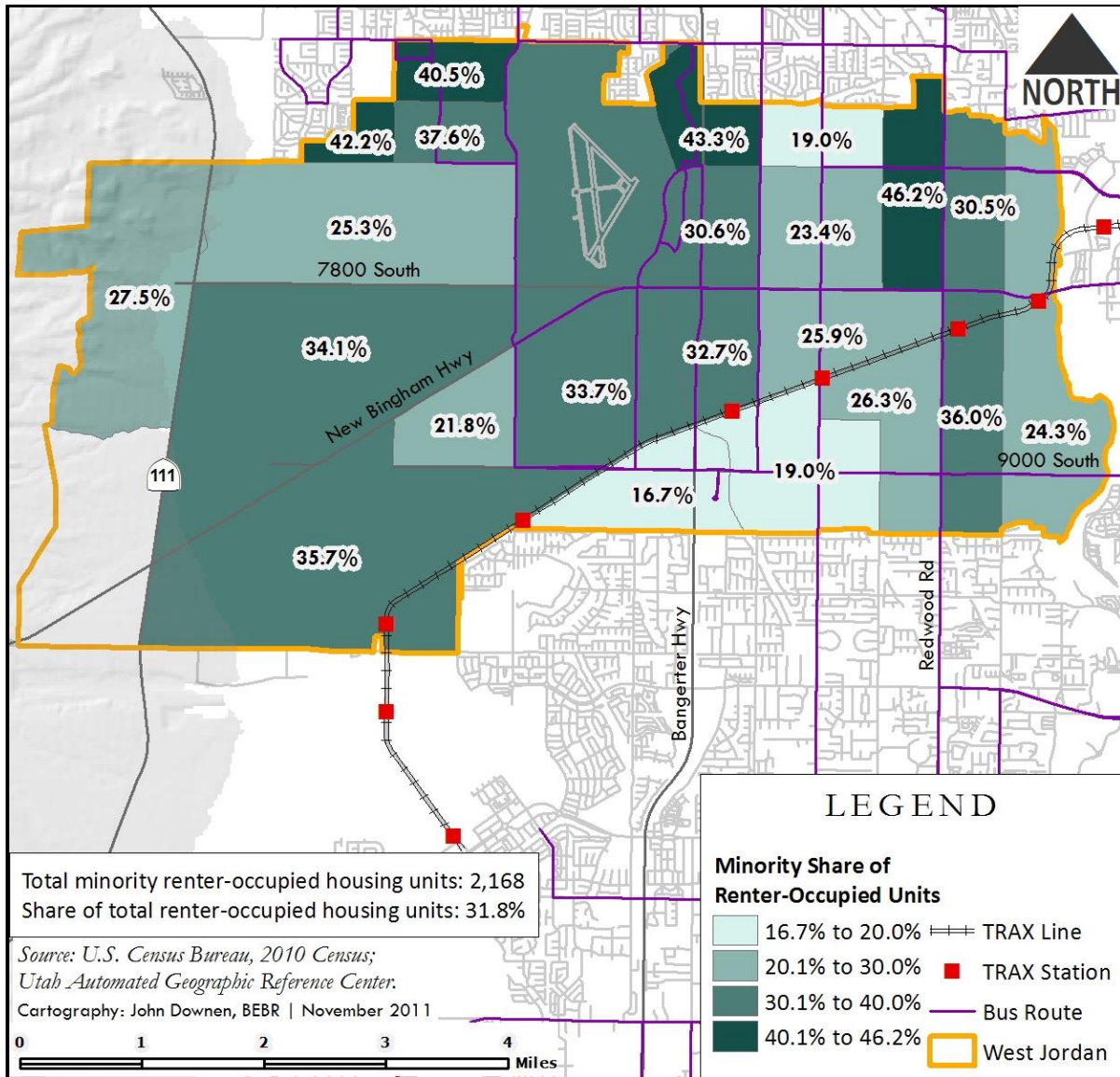


Figure 9 shows the minority share of renter-occupied units in Jordan. Despite the relatively few minority rental units in the small census tracts northwest and northeast of the airport (Figure 8), the central and southwestern census tracts have the highest minority shares of rental-occupied units (Figure 9). Similarly, over a third of the rental units in the developing residential communities southwest of the airport are minority households

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

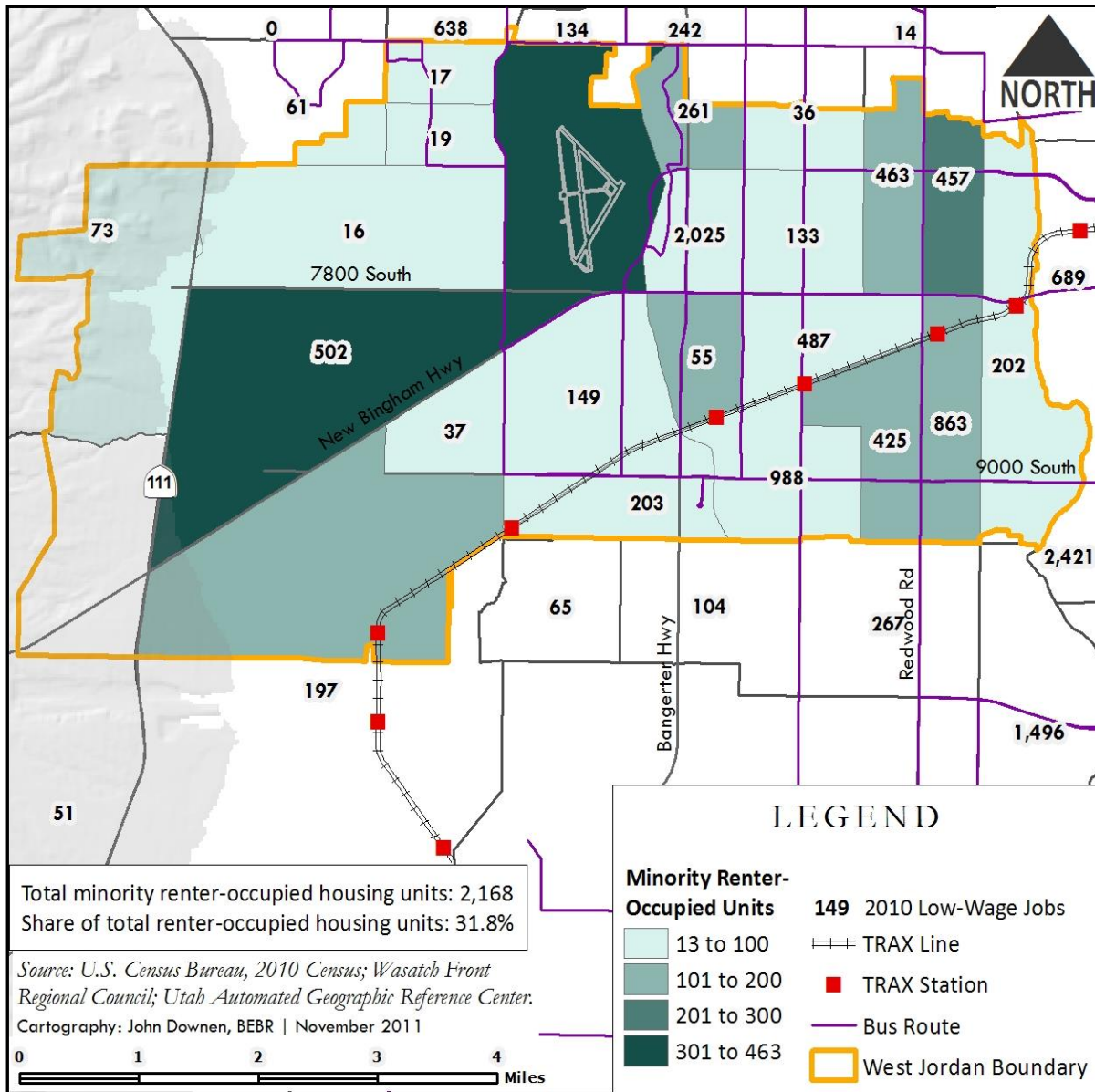


Figure 10 overlays the density of minority renter-occupied units with the number of entry-level wage jobs. The highest concentrations of minority rental units are in newly developing neighborhoods between 7800 South and New Bingham Highway (southwest of the airport). However, there are no bus routes on the west side of the city, making it difficult to commute via public transit to employment centers at and near the airport. The TRAX line runs through the southeast corner of city and thus does not serve the newly developing west side and low-wage employment centers near the airport.

**Table 9
Predicted Racial/Ethnic
Composition Ratio
West Jordan**

	Percent of Households		Actual/ Predicted Ratio
	Actual	Predicted	
Minority	16.9%	14.2%	1.18
Asian	1.7%	2.1%	0.83
Black	1.1%	1.0%	1.15
Hispanic/Latino	12.1%	9.4%	1.29

Source: HUD Spreadsheet for Sustainable Communities Grantees

Actual/Predicted Ratio Scale

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

Table 9 shows the ratio between predicted and actual racial/ethnic composition in West Jordan. The predicted percent of minority households is the expected composition based on the income distribution in the metropolitan area by race and ethnicity. The actual composition is based on the 2005-2009 American Community Survey 5-year estimates. Based on this methodology, Asians are mildly below the predicted value.

Table 10 compares the affordability of rental housing units in West Jordan with the metro area for rental prices based on AMI. Affordability is based on the threshold that rent would not amount to more than 30 percent of total income. Only 0.4 percent of West Jordan's total housing units are deemed affordable on a rental basis below the 30 percent AMI level. The percent of fair share need below the 30 percent AMI level is 8 percent, meaning that

**Table 10
Fair Share Affordable Housing Index
West Jordan**

	A	B	C	D	E	F
Income Level	Total Housing Units	Number of Affordable Rental Units	% of Affordable Rental Units in City (B/A)	% of Affordable Rental Units in Metro Area	Fair Share Need (D x A)	% of Fair Share Need (C/D)
<30% AMI	29,883	139	0.4%	6%	1,828	8%
30%-50% AMI	29,883	624	2%	12%	3,454	18%
50%-80% AMI	29,883	3,214	11%	19%	5,642	57%

Source: HUD Spreadsheet for Sustainable Communities Grantees

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

the city's share of affordable rental units at this income level is only 8 percent of the metro area's share. According to HUD's scale for the fair share affordable housing index, this means that West Jordan's housing stock is extremely unaffordable for those with incomes below the 30 percent AMI threshold. The city's housing units are also considered extremely unaffordable for those with incomes at 30-50 percent AMI. For the 50-80 percent AMI income bracket, the city's overall housing stock is still moderately unaffordable to rent.

Percent of Fair Share Need Scale

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

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

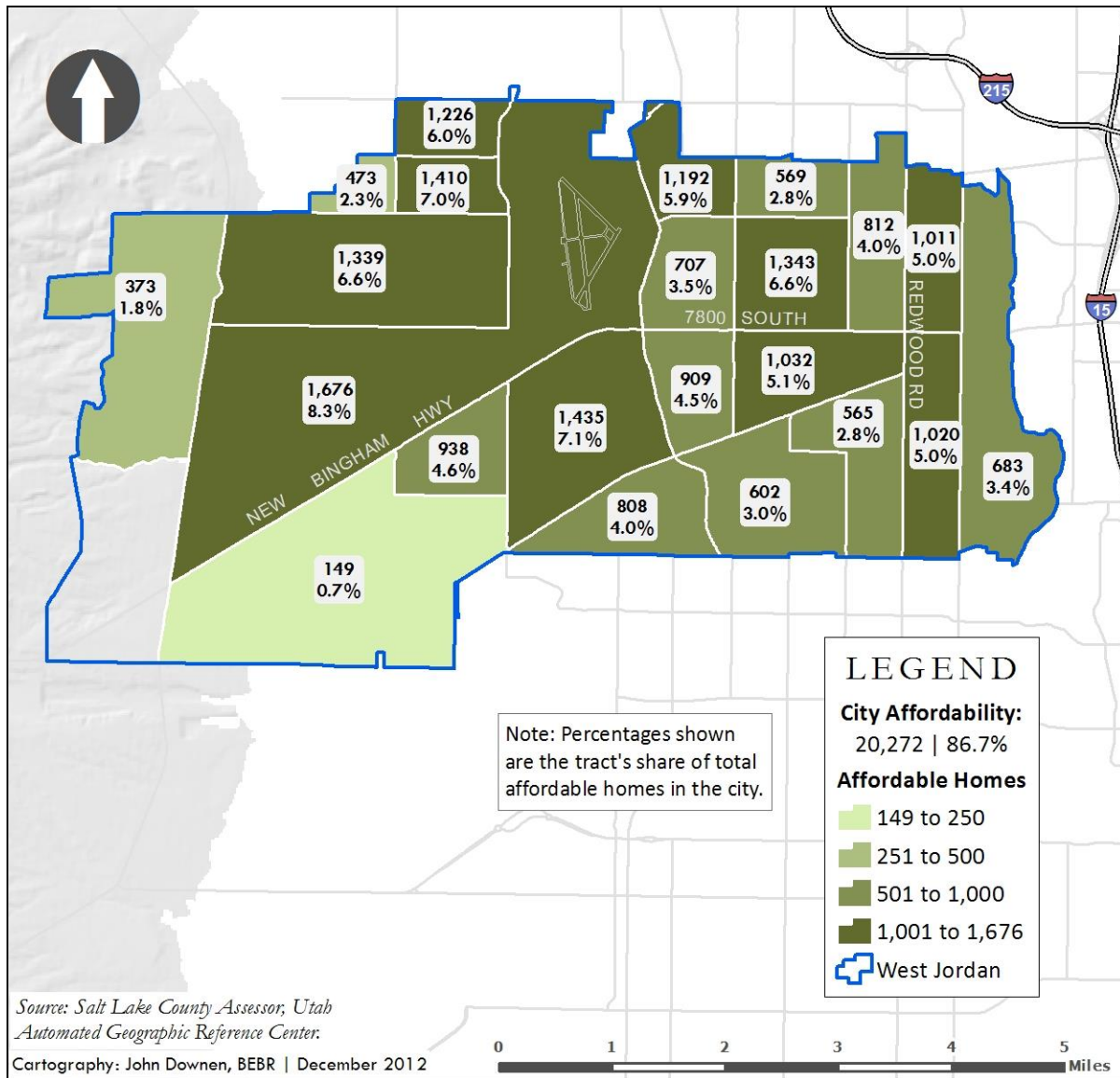


Figure 11 shows the number and share of single-family homes in West Jordan census tracts that are affordable at 80 percent AMI in 2011. The percentages shown in Figure 11 are each census tract's share of the total affordable homes in the city. Affordability calculations are based on 30 percent of annual income, accounting for taxes, home insurance, and mortgage insurance. The maximum affordable single-family home price at 80 percent AMI is \$255,897. Only 8.3 percent of all affordable single-family homes in West Jordan are located in the census tract containing South Valley Regional Airport (Figure 11). This census tract has 14 percent of minority owner-occupied units (Figure 5) and 21 percent of minority rental units in the city (Figure 8).

**Table 11
Dissimilarity Index**

Group	Dissimilarity Index		Dissimilarity Index Scale	
	West Jordan	Salt Lake County	Value Ranges	Interpretation
Minority	0.28	0.43	≤ 0.40	Low Segregation
Hispanic/Latino	0.33	0.50	0.41-0.54	Moderate Segregation
Non-Hispanic Minority	0.34	0.41	≥ 0.55	High Segregation

Source: BEBR computations from 2010 Census

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

The dissimilarity index is calculated as follows:

$$Dissimilarity (W, M)_j = \frac{1}{2} \sum_{i=1}^N \left| \frac{M_i}{M_j} - \frac{W_i}{W_j} \right|$$

where

W = non-Hispanic population

M = minority population

i = i^{th} census block group

j = geographic area (city or county)

N = number of census blocks in geographic area j

Another measure of segregation is the dissimilarity index shown in Table 11. The dissimilarity indices for West Jordan are below the county levels. In order for the minority and non-Hispanic white geographic distribution in West Jordan to match, 28 percent of minorities would have to move to other census blocks in the city. While the dissimilarity index itself does not provide any geospatial information about segregation, Figure 12 shows the dissimilarities between minorities and non-Hispanic white populations at the census block level.

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

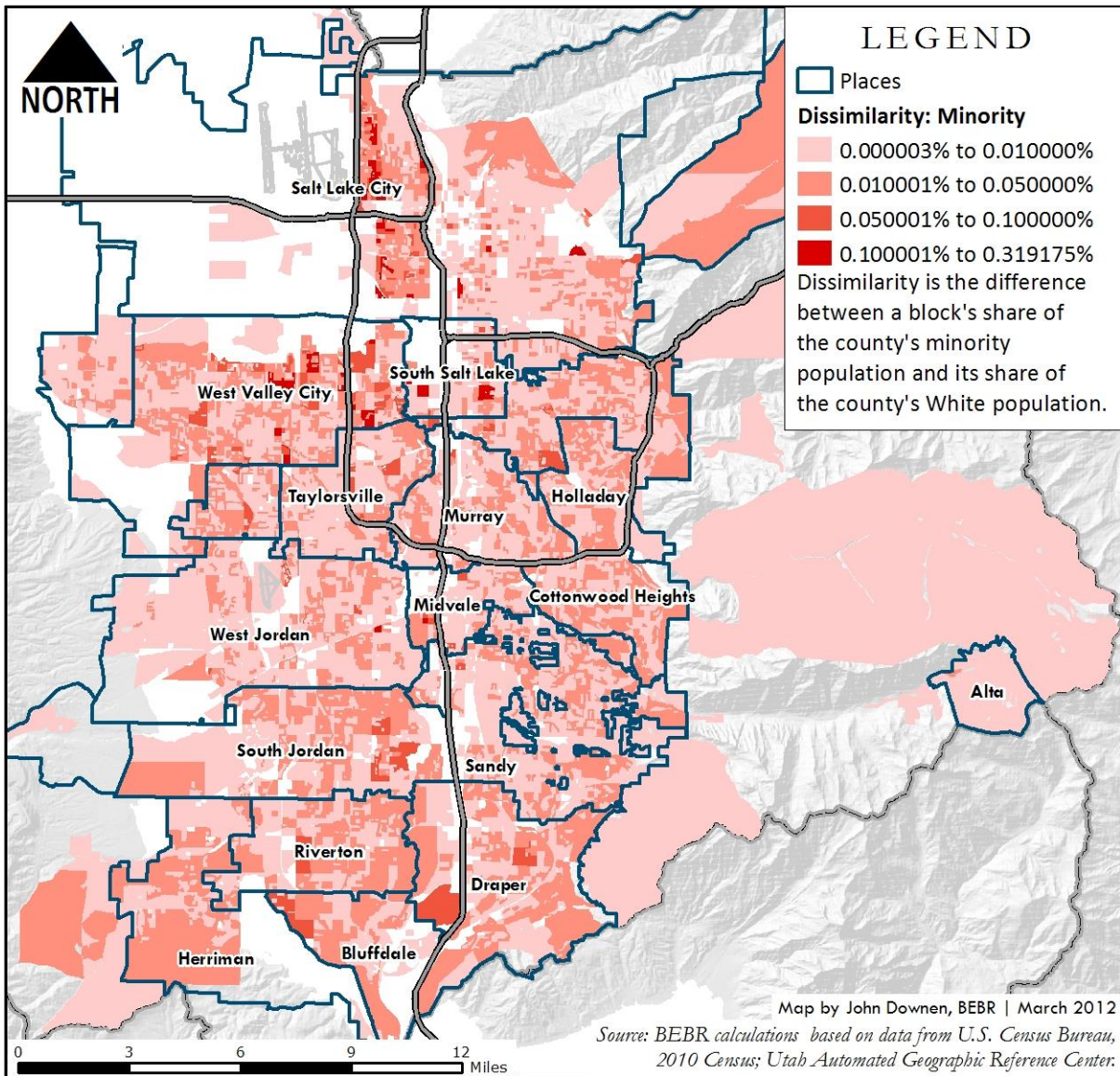


Figure 12 shows the absolute difference between each census block’s county share of the minority and non-Hispanic white population. These absolute differences are used to calculate the dissimilarity index in Table 11. West Jordan has two census blocks on the east side with dissimilarities greater than 0.1 percent. Noticeably large dissimilarities between the minority and non-Hispanic white county shares at the block level are concentrated in Salt Lake City’s west side neighborhoods of the River District. Some census blocks in West Valley City and South Salt Lake also have dissimilarities greater than 0.1 percent. Only two census blocks in West Jordan have dissimilarity indexes greater than 0.1%

RCAP

In 2010, there were 5,582 poor individuals living in West Jordan, approximately 5.6 percent of the city's population (Table 12). A minority was almost three times as likely to be poor as a non-Hispanic white person. Pacific Islanders had the highest rate of poverty of any racial/ethnic group at 22.8 percent. Similarly, 15.8 percent of Native Americans and 11.3 percent of Hispanics in the city were poor. The lowest prevalence of poverty was among blacks at 4.6 percent and non-Hispanic whites, of whom only 4 percent were poor. Even though non-Hispanic whites had the lowest rate of poverty, they comprised just over half of the poor population in West Jordan (Table 13). Hispanics composed 31.2 percent of the poor population, while every other ethnic group was less than a tenth of the poor population in the city. Overall, poor non-Hispanic whites only outnumbered poor minorities by about 700 individuals.

Table 12
Number and Share of Poor Persons by
Race and Ethnicity in West Jordan,
2010

		Poor	Total	% Poor
West Jordan	Black	37	809	4.6%
	Native Am.	103	650	15.8%
	Asian	174	2244	7.8%
	Pacific Island	380	1665	22.8%
	Hispanic	1739	15404	11.3%
	Total Minority	2433	20772	11.7%
	White	3149	78924	4.0%
	Total	5582	99696	5.6%

Source: HUD Spreadsheet for Sustainable Communities Grantees

Table 13
Poor in West Jordan by Race and
Ethnicity, 2010

	Race/Ethnicity	Persons	Share
West Jordan	Black	37	0.7%
	Native Am.	103	1.8%
	Asian	174	3.1%
	Pacific Island	380	6.8%
	Hispanic	1739	31.2%
	Total Minority	2433	43.6%
	White	3149	56.4%
	Total Poor	5582	100.0%

Source: HUD Spreadsheet for Sustainable Communities Grantees

Figure 13 maps the concentrations of poor people living in West Jordan in 2010. There are three main areas of dense concentrations of poor residents. One is in the northeast corner of the city, north of 7800 South and east of 1700 West. This area is along bus routes headed north to south and east to west, as well as TRAX and the interstates of I-15 and I-215. This cluster is heavily concentrated with poor non-Hispanic whites, Hispanics and Asians. A second area is just south of the South Valley Regional Airport between 4800 West and Bangerter Highway. This area is also along TRAX and a few bus routes, but what is most noticeable is the acute density of the poor Pacific Islanders living there. This area contains all of the mapped poor Pacific Islanders in the city. A third area that is heavily concentrated with poor Hispanics is in the northwest corner of the city, just west of the airport and north of 7000 South. Beyond the concentrations around the airport and in the northeast corner of the city, West Jordan is broadly covered with poor residents, even on the west side where there are no bus routes and few amenities. Despite the concentrations and number of the poor living in West Jordan, there are no HUD-defined areas of racial or ethnic concentrated areas of poverty (Figure 14). Even the south central area, which is heavily concentrated with poor Pacific Islanders, is not concentrated enough with poor residents or any single race or ethnicity to be considered an RCAP. However, this is most likely due to the high population of the city, compared to smaller cities which have fewer residents, but higher concentrations of minorities and poverty.

Figure 13
Poor by Census Tract in West Jordan, 2010

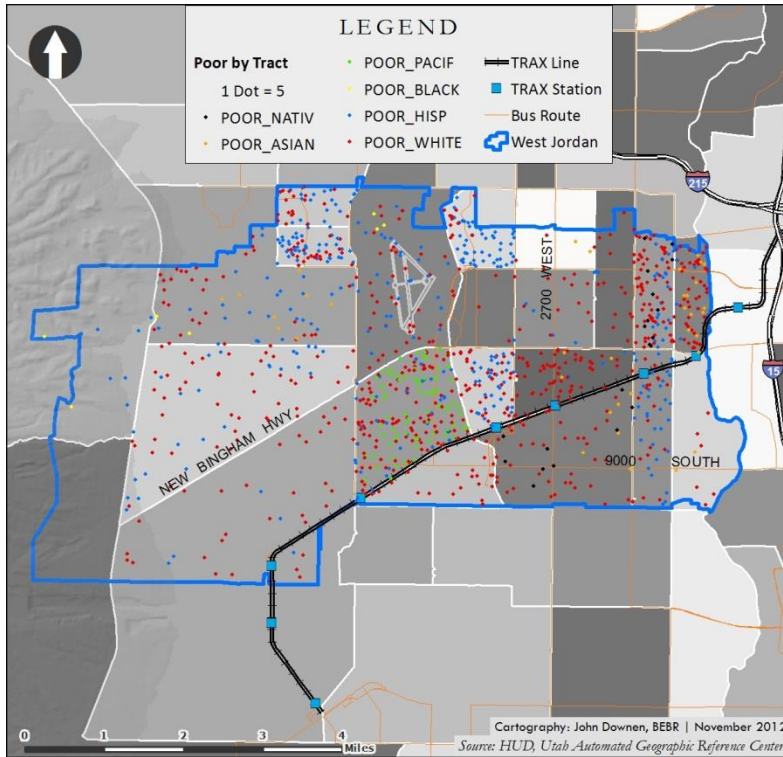
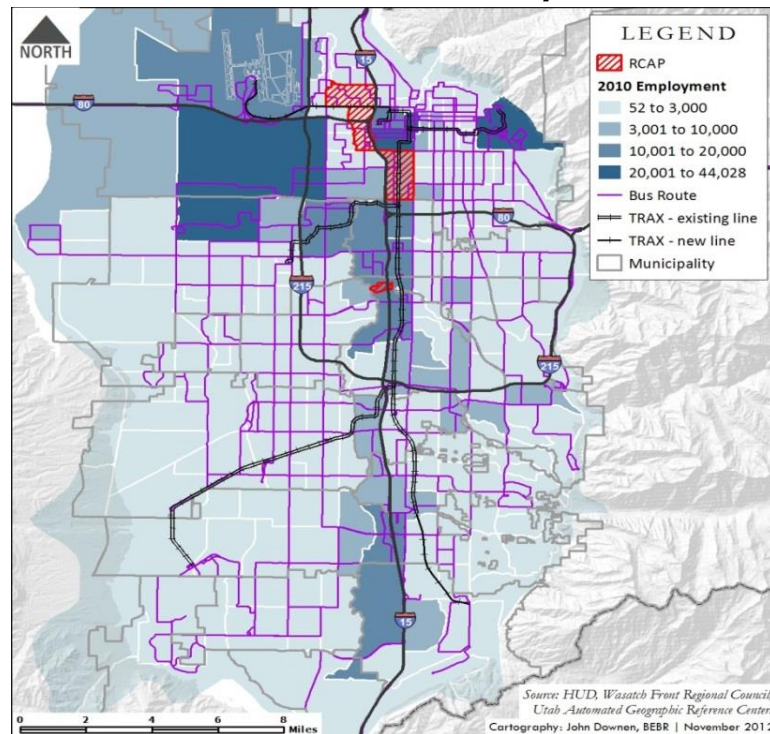


Figure 14
Racially/Ethnicly Concentrated Areas of Poverty in Salt Lake County



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

The following three figures (Figure 15, Figure 16 and Figure 17) show concentrations of poverty in Salt Lake County, estimated from the 2007-2011 American Community Survey. Here, an area of poverty is considered concentrated when it has three times the countywide average share of the population living below the countywide poverty line. The countywide average is approximately 11.6 percent, so an area is considered highly concentrated when it has 34.7 percent or more of the population living in poverty. Figure 15 overlays these areas of poverty with census tracts that have minority-majority populations, which are defined as having a minority share greater than 50 percent of the census tract population. Figure 16 overlays the concentrations of poverty with tracts that have a Hispanic population of 10 percentage points or more above the county’s population of 17.1 percent. Figure 17, on the other hand, overlays the concentrated areas of poverty with a county map showing the census tracts where the minority population is 10 percentage points above the county average of 26 percent. In all cases, the concentrated areas of poverty are along Interstate 15 in Salt Lake City. None of the concentrations are in the city of West Jordan. However, there are some census tracts with a minority-majority and higher concentrations of Hispanics just along the eastern border of the city in Midvale, and the northern border of Kearns, one of which stretches into West Jordan. As a result, it is not surprising to see the concentration of minorities living on the eastern border of West Jordan. In some cases, minority households chose to live in an area where they feel comfortable, which in some cases means neighborhoods with higher concentration of people who share similar cultural characteristics. This could also explain the concentration of poor Pacific Islanders in the south-central region of the city (Figure 13).

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

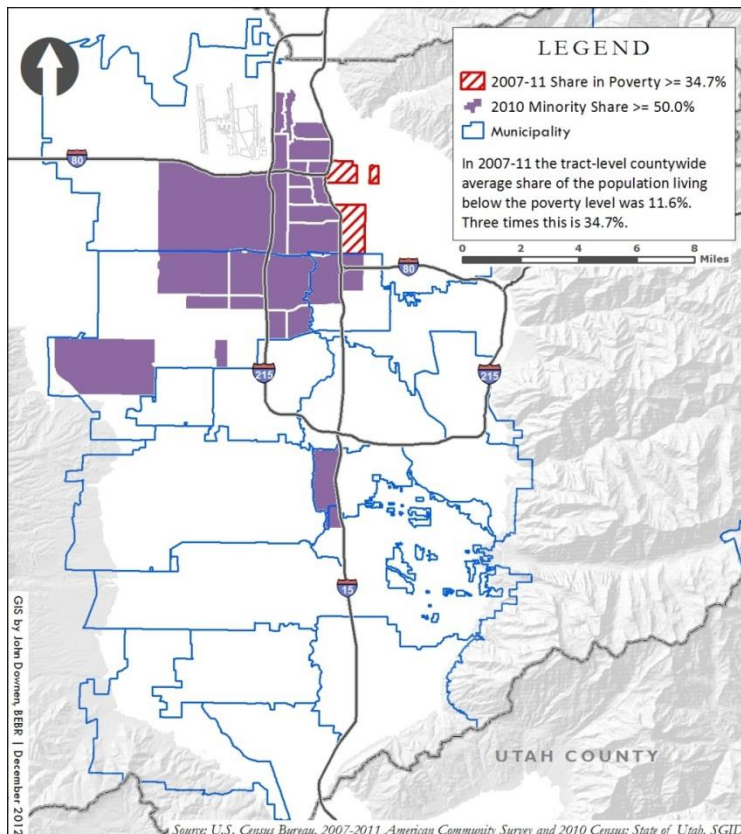


Figure 16
Concentrations of Poverty and
Hispanics by Tract in Salt Lake
County, 2007–2011

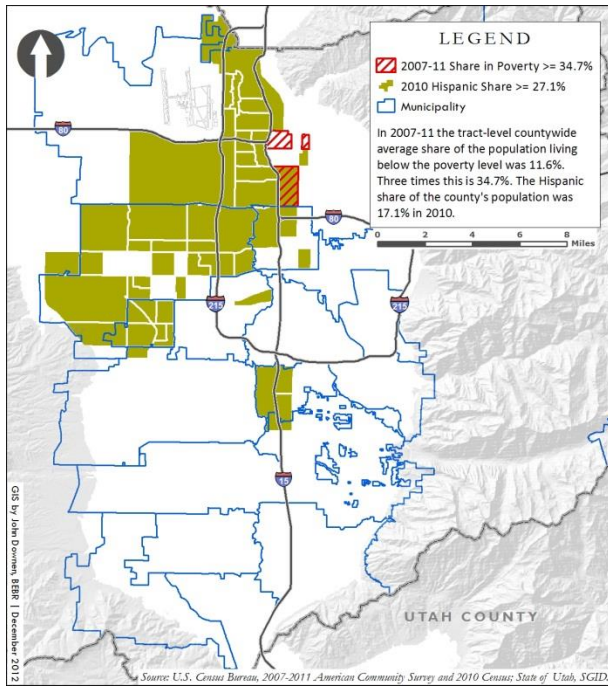


Figure 17
Concentrations of Poverty and
Minorities by Tract in Salt Lake
County, 2007–2011

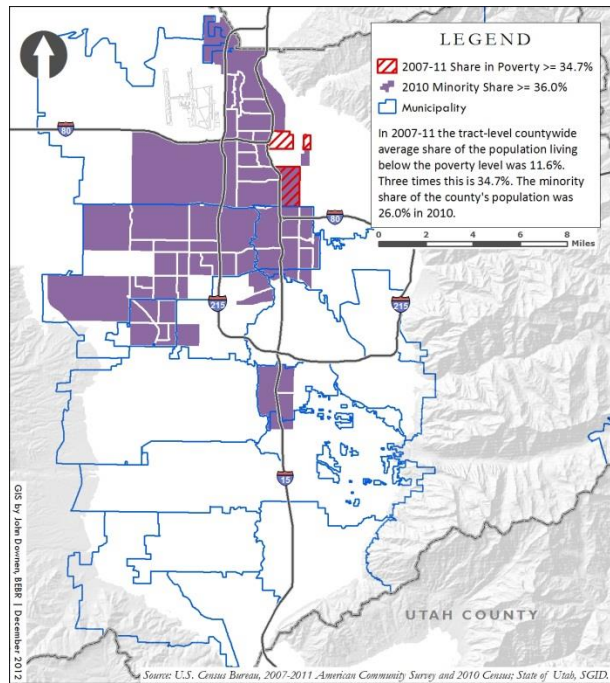
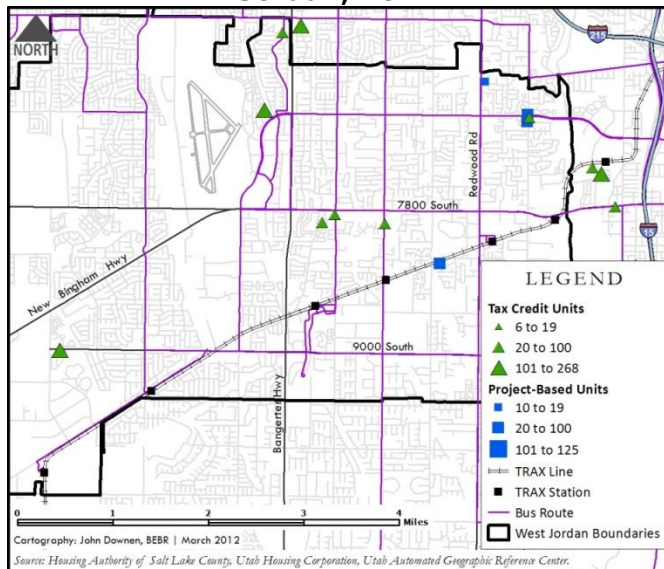


Figure 18
Subsidized Apartment Projects in West Jordan, 2011



In West Jordan, there are 11 subsidized apartment projects dispersed throughout the city, each mapped in Figure 18. With one exception of a tax credit unit located at the west end of 9000 South, all the projects are located on the eastern side of the city, a majority near 7800 South and north. None are located to the western or southern neighboring of the airport, despite the dense concentrations of poor residents living in these areas (Figure 13). Though some units are located in heavily poor areas of the city, they do not fill the need for affordable housing in all areas of the city. This is indicated by the dense concentration of poor residents living on the west side, far from any subsidized apartment projects. Similarly, there are none located in the neighborhoods south of the airport, where the densest concentration of poor Pacific Islanders live.

The use of Section 8 vouchers, as shown in Figure 19, follow a similar special pattern as the poor residents of the city, (Figure 13). This could indicate a desire for low-income renters and homeowners to live in less concentrated areas of the city, perhaps in the higher-opportunity tracts. A majority of the vouchers are used in the eastern and north sections of the city, with very few being used in the far west census tracts. Many vouchers are used around the South Valley Regional Airport, with a small but dense concentration in the neighborhoods north of the intersection of Jordan Landing Boulevard and Central Park Drive. There are also concentrations along the Old Bingham Highway and Redwood Road. Other voucher concentrations are just past the northern border of the city in Kearns and Taylorsville. This is not surprising, considering the dense use of vouchers along the border as well. Clearly, these neighborhoods are areas of higher concentrations of low-income households that transcend city borders. Potential actions taken to improve these areas would be most effective if the efforts are not bound by city jurisdictions.

Figure 19
Section 8 Vouchers in West Jordan, 2011

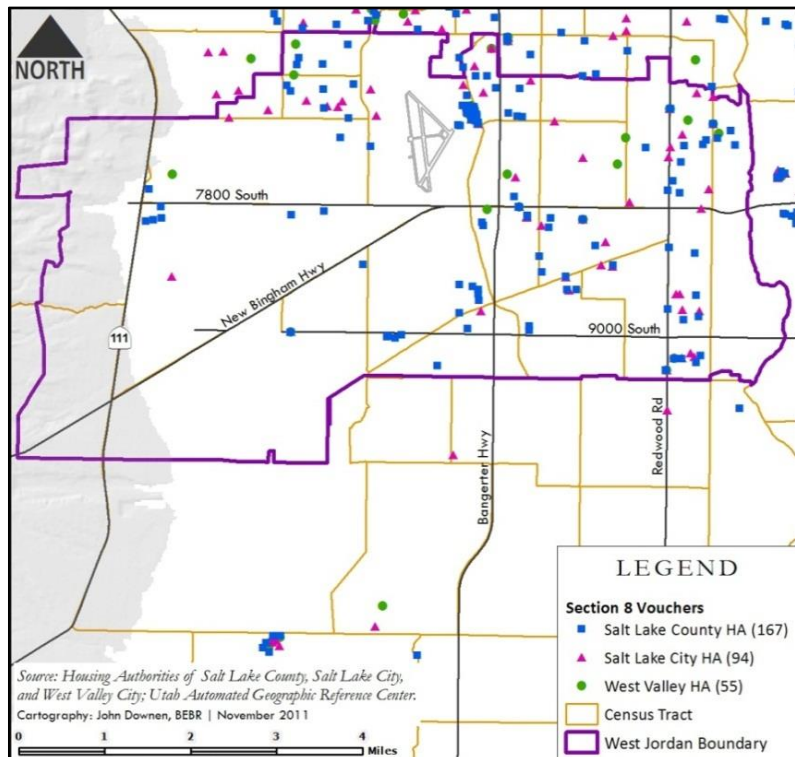


Table 14 displays the number of individuals receiving public assistance in Salt Lake County disaggregated by city and zip code. Each count in 2007 and 2012 is a distinct individual living in that zip code receiving assistance from a state program such as food stamps, Temporary Assistance for Needy Families (TANF) or any other financial, medical or child care services from the Department of Workforce Services (DWS). DWS estimates its services capture at least 70 percent of all poor living in these areas; the other 30 percent may be living in poverty, but are not using any form of public assistance. Though zip code 84084 shows a decline between 2007 and 2012, it is important to note the addition of zip code 84081 post 2007, which was created in part from 84084 and 84088. Therefore, a more accurate measurement for the change in public assistance recipients in Taylorsville comes from the aggregated total of the zip codes in each year. Overall, the city of West Jordan is estimated to have experienced an increase in its number of public assistance recipients by over 50 percent, just above the county total of 47 percent. This equates to over 7,000 more recipients in 2012 than 2007 which is about a tenth of the total number of additional recipients in the entire county.

Table 14
Distinct Individuals on Public Assistance, 2007–2012

City	Zip Code	2007 Individuals	2012 Individuals	Absolute Change	Percentage Change
West Jordan*	84081	N/A	5,621	—	—
West Jordan*	84084	7,633	7,493	-140	-1.8%
West Jordan*	84088	5,698	7,296	1,598	28.0%
West Jordan Totals		13,331	20,410	7079†	53.1%†
Salt Lake County		146,699	215,426	68,727	46.8%

* ZCTA 84081 is a new Zip Code since post 2007 and was cut from 84088 and 84118.

† Absolute and percentage change totals are based on the change in the sum of all ZCTAs from each year, based on the assumption that ZCTA 84081 was cut from the other two. Therefore the changes are an approximation of actual change.

Source: BEBR Calculations from Utah DWS Data

The number of individuals receiving public assistance in 2012 is mapped in Figure 20 by zip code. Each zip code with fewer than ten recipients was suppressed in the data, and each zip code without any residences or missing data are also removed. It should be noted that the zip codes used in the map are based on the total population from the U.S. Census Bureau’s “zip code tabulation areas” (ZCTAs) which do not exactly correspond to the zip code boundaries used by DWS. Regardless, the general trends of public assistance recipients can be seen. Overall, the number of recipients ranged from under 10 to over 18,000 in a single zip code in 2012. While a few zip codes declined in the number of recipients, most increased by over 50 percent in all regions of the county. When comparing 2007 to 2012, it is important to note, any zip code marked with an asterisk was reshaped, or is a new zip code between 2007 and 2012. The 20,410 individuals on public assistance in West Jordan account for about 9.5 percent of the county total. Not surprisingly, the east side of Jordan shares many similar characteristics with other centrally located cities like Midvale and east Murray, and as a result falls in the mid-to-high range for total number of recipients. However, the west-side zip code of 84081, though less populated than the east side, does have almost 2,000 fewer recipients than those closer to the interstate.

Figure 20
Individuals Receiving Public Assistance by Zip Code, 2012

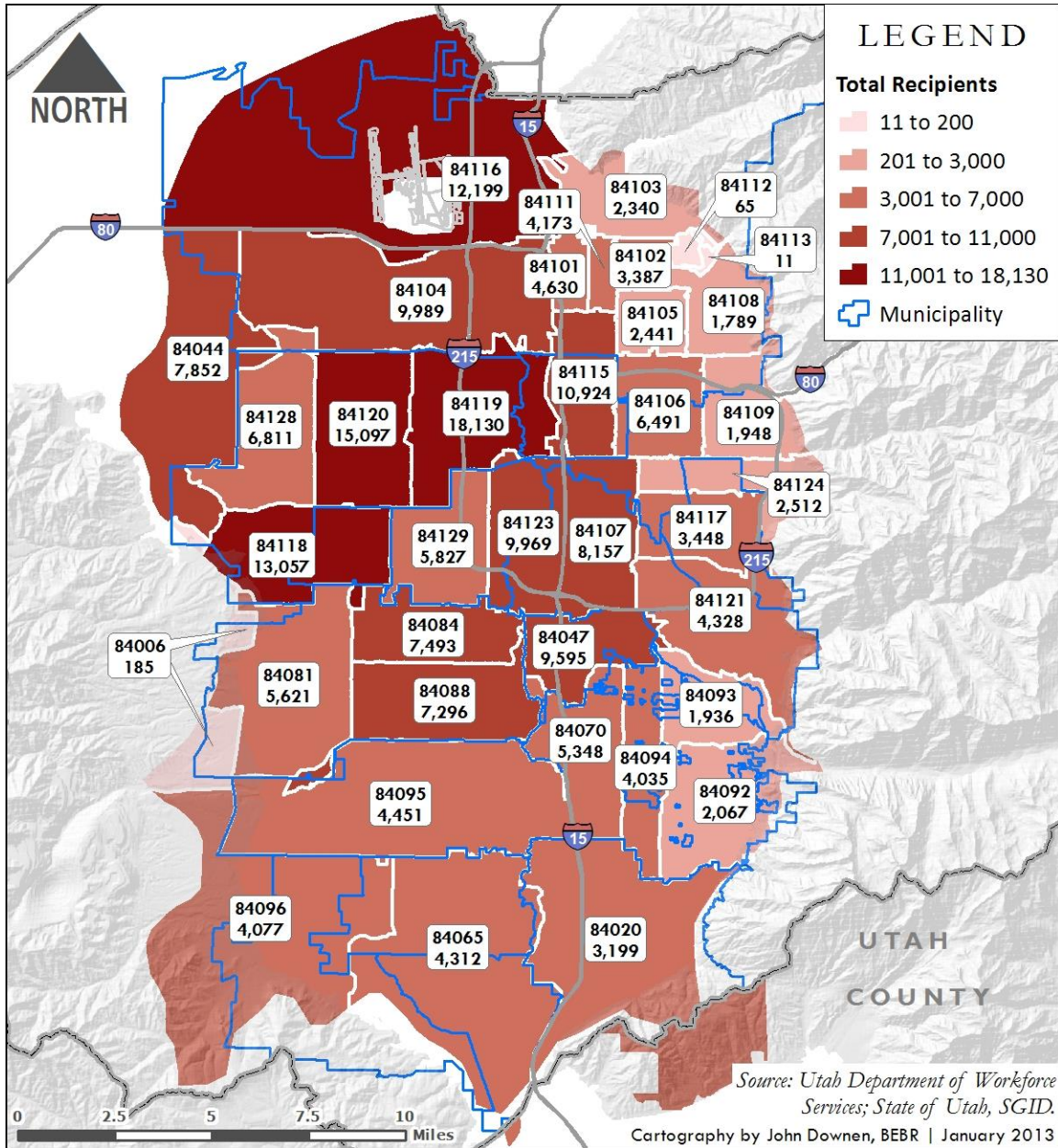


Table 15 uses the same DWS data on public assistance to calculate the number of large family households in 2007 and 2012 on public assistance. A large family size is classified as a household with five or more individuals living together. The approximate increase in large families on public assistance in West Jordan is 59.9 percent, only one percentage point below the county. Overall, there is an estimated increase of 1,924 large families on public assistance in the city from 2007-2012. Figure 21 displays the concentrations of these large families by zip code in Salt Lake County. West Jordan again has numbers of recipients close to the neighboring cities of Midvale and Taylorsville, while still a few thousand fewer than West Valley City farther north.

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

City	Zip Code	2007 Family Size ≥5	2012 Family Size ≥5	Absolute Change	Percentage Change
West Jordan*	84081	N/A	1,647	—	—
West Jordan*	84084	1,871	1,746	-125	-6.7%
West Jordan*	84088	1,339	1,741	402	30.0%
West Jordan Totals		3,210	5,134	1,924†	59.9%†
Salt Lake County		30,473	49,019	18,546	60.9%

* ZCTA 84081 is a new Zip Code since post 2007 and was cut from 84088 and 84118.

† Absolute and percentage change totals are based on the change in the sum of all ZCTAs from each year, based on the assumption that ZCTA 84081 was cut from the other two. Therefore the changes are an approximation of actual change.

Source: BEBR Calculations from Utah DWS Data

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

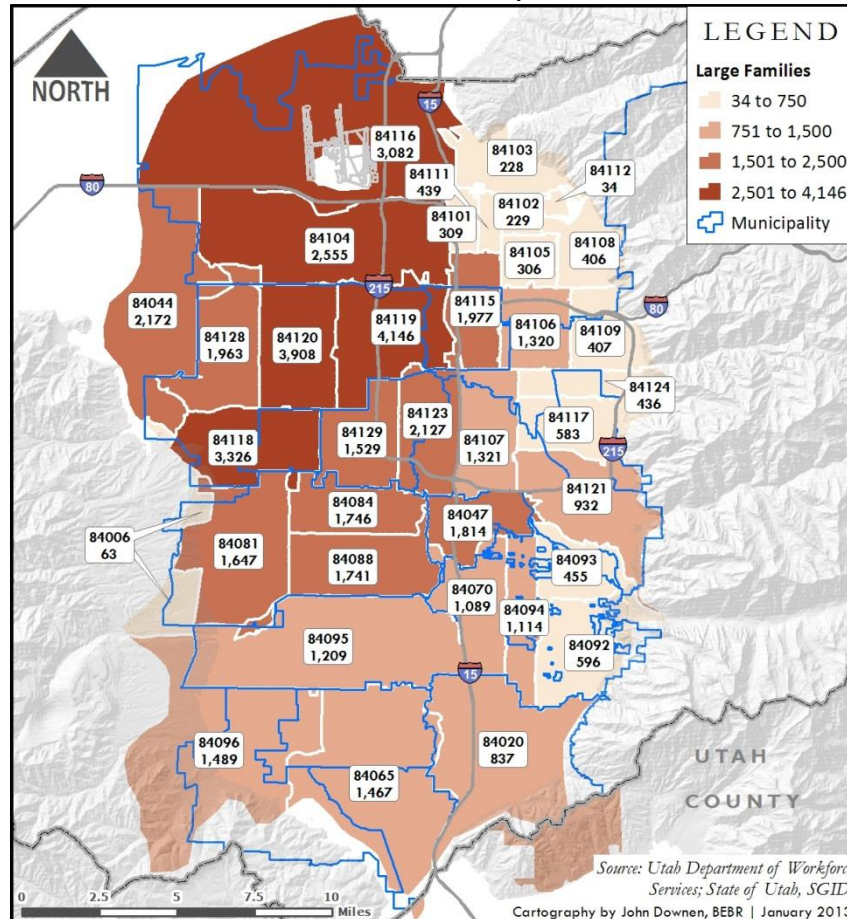


Table 16 shows the number of disabled individuals receiving public assistance in 2007 and 2012. To be considered disabled and on public assistance by DWS standards, each individual must be receiving financial assistance and have a verified condition by the Medical Review Board. West Jordan saw an increase of about 455 disabled individuals on public assistance between 2007 and 2012. This is about a 30 percent increase, about 9 percentage points above the county total. Figure 22 maps the number of disabled individuals on public assistance in 2012 by zip code in Salt Lake County. West Jordan has a mid-range number of disabled resident, in respect to the county, on public assistance, much like its neighboring zip codes of western Sandy, Midvale and western Murray.

Table 16
Disabled Individuals on Public Assistance, 2007–2012

City	Zip Code	2007 Disabled	2012 Disabled	Absolute Change	Percentage Change
West Jordan*	84081	N/A	315	—	—
West Jordan*	84084	836	805	-31	-3.7%
West Jordan*	84088	706	877	171	24.2%
West Jordan Totals		1542	1997	455†	29.5%†
Salt Lake County		21,460	25,942	4,482	20.9%

* ZCTA 84081 is a new Zip Code since post 2007 and was cut from 84088 and 84118.

† Absolute and percentage change totals are based on the change in the sum of all ZCTAs from each year, based on the assumption that ZCTA 84081 was cut from the other two. Therefore the changes are an approximation of actual change.

Source: BEBR Calculations from Utah DWS Data

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

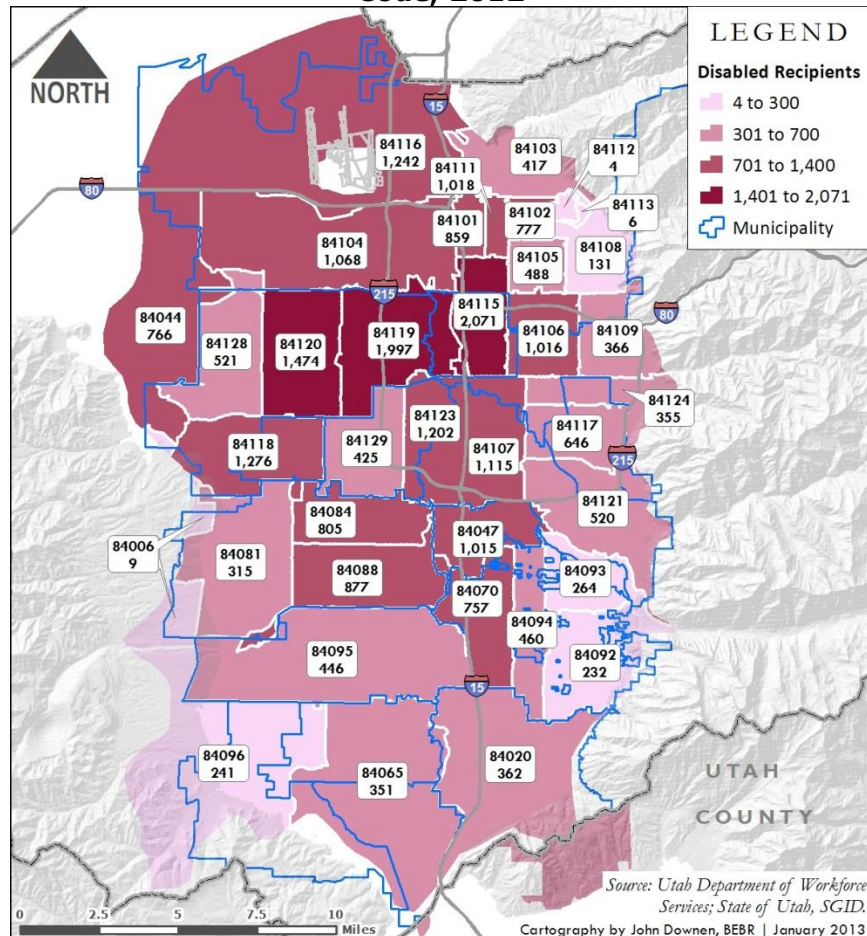


Table 17 uses the DWS data for the number of Hispanic individuals who received public assistance from the state in 2007 and 2012. The number of Hispanic individuals in West Jordan receiving public assistance increased by 27 percent, or 925 more individuals in 2012 than 2007. This is about six percentage points higher than the county total. Figure 23 maps the number of Hispanic recipients in 2012 by zip code in Salt Lake County. West Jordan clearly has higher numbers of Hispanic recipients than the cities to the south, but still has substantially fewer than those in the northwestern zip codes in cities like West Valley City and the west side of Salt Lake City.

Table 17
Hispanic Individuals on Public Assistance, 2007–2012

City	Zip Code	2007 Hispanic	2012 Hispanic	Absolute Change	Percentage Change
West Jordan*	84081	N/A	1,039	—	—
West Jordan*	84084	2,006	1,671	-335	-16.7%
West Jordan*	84088	1,406	1,627	221	15.7%
West Jordan Totals		3412	4337	925†	27.1%†
Salt Lake County		37,911	46,019	8,108	21.4%

* ZCTA 84081 is a new Zip Code since post 2007 and was cut from 84088 and 84118.

† Absolute and percentage change totals are based on the change in the sum of all ZCTAs from each year, based on the assumption that ZCTA 84081 was cut from the other two. Therefore the changes are an approximation of actual change.

Source: BEBR Calculations from Utah DWS Data

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

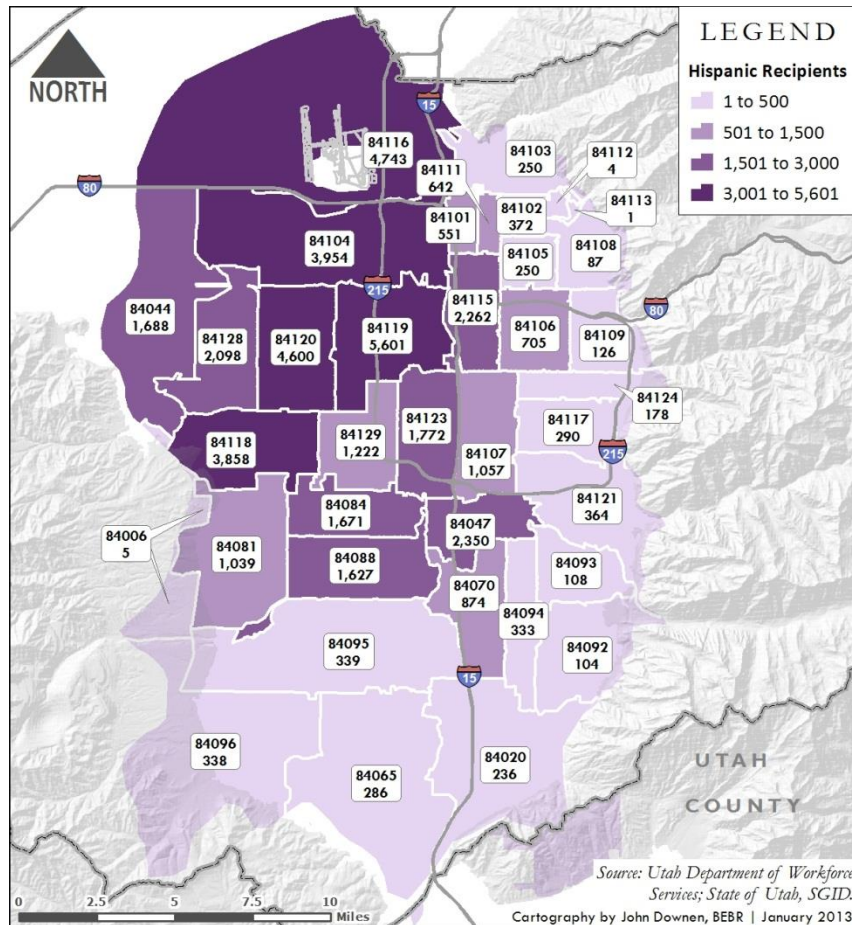
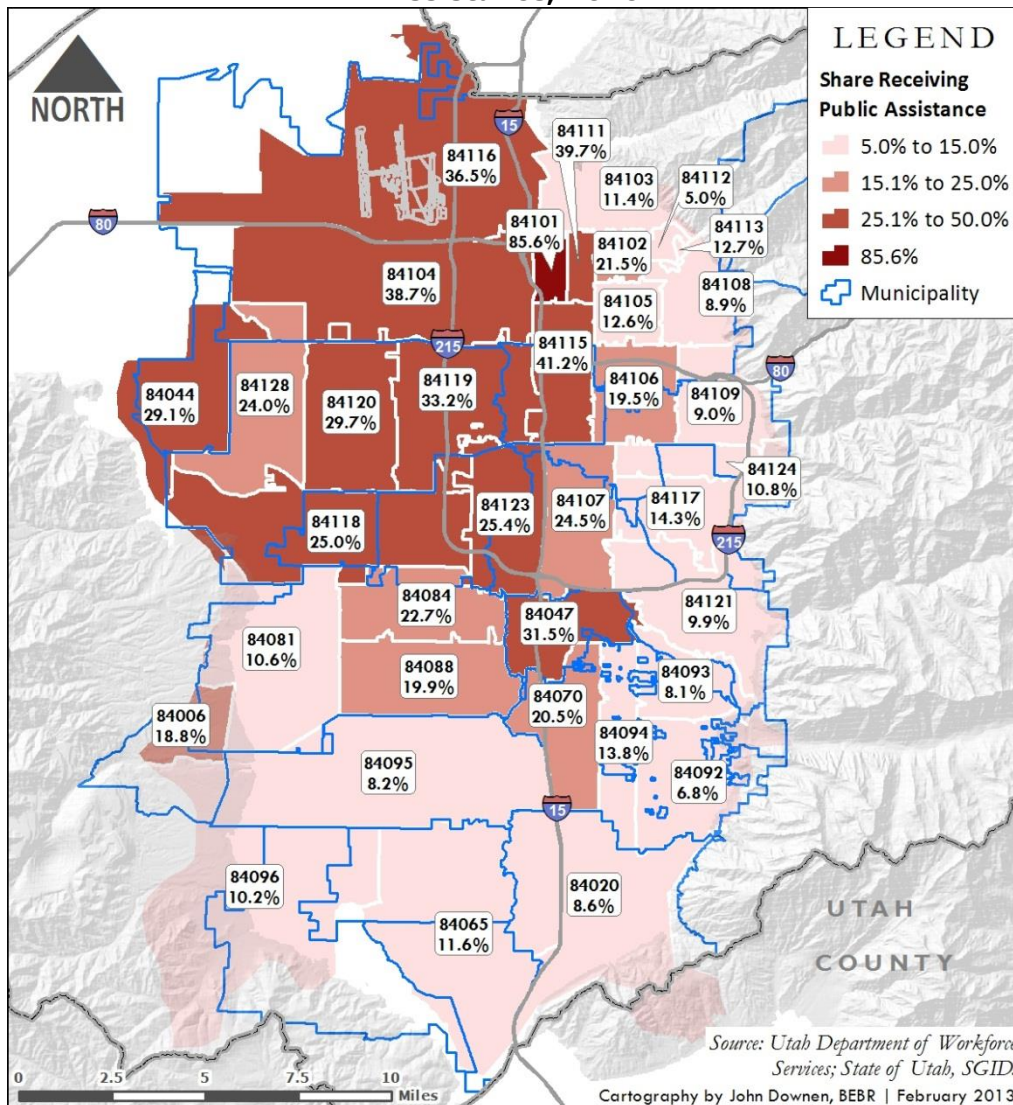


Figure 24 maps the percentage of individuals receiving public assistance in each zip code in Salt Lake County. It should be noted that the zip codes used in the map are the U.S. Census Bureau's ZCTAs which do not exactly correspond to the zip code boundaries used by DWS. Regardless, the general trends of public assistance recipients as a share of the region's population can be seen. Again, there is a clear difference between the east and west sides of Interstate 15, and even more so between the northwestern and southeastern region. Much higher proportions of the populations in the northwest and west are recipients of some form of public assistance from the state. The east side of West Jordan has higher percentages of public assistance recipients than the southern cities, but still not quite as concentrated as the cities further north. More specifically, the concentration of individuals on public assistance is clearly in the two eastern zip codes of the city, closer to more transportation options and commercial centers. This could be due to a choice to live near these amenities, or an inability to afford to live further west due to inadequate housing options, lack of transportation or a variety of other reasons, forcing them to find housing further east in the city.

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



DISPARITIES IN OPPORTUNITY

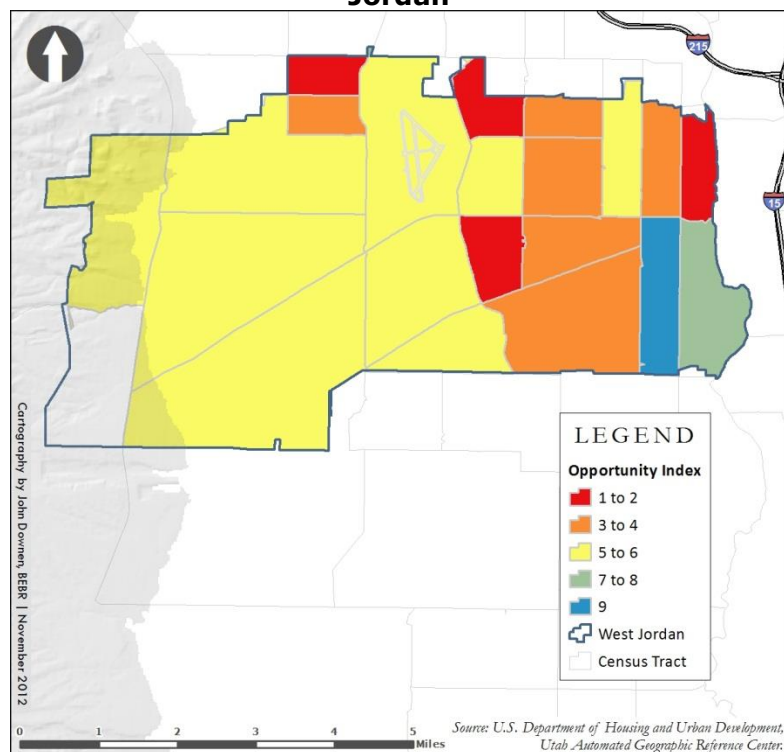
HUD provided six measurements of opportunity for each census tract with which to quantify the number of important “stressors” and “assets” that influence the ability of an individual or family to access and capitalize on opportunity. These six measures were aggregated to the city level using the population of each census tract within the city boundaries of West Jordan. Using the population of each tract within the city boundaries of West Jordan, it received an overall opportunity score of 4.5 out of 10, just barely below the county average (Table 18). Three out of the five component indices scored above the county average including the labor market engagement index at 0.4 points above the county average, housing stability score 0.5 points above, and poverty score the highest at 1.1 points above the county. None of these indices were that far above the county average. Unfortunately, job access scored a full point below the county and school proficiency, the lowest-scoring index of the city, received a 2.7, over 1.5 points below the county. Overall, the city of West Jordan scored about average for the county in terms of access to opportunity. With the mid-range poverty rate (Table 12) and centralized location, the city is considered on par with the county.

Table 18
Weighted, Standardized Opportunity Index

	School Proficiency	Job Access	Labor Market Engagement	Poverty	Housing Stability	Opportunity
West Jordan	2.7	4.4	5.4	6.0	5.8	4.5
Salt Lake County	4.3	5.4	5.0	4.9	5.3	4.9

Source: HUD Spreadsheet for Sustainable Communities Grantees

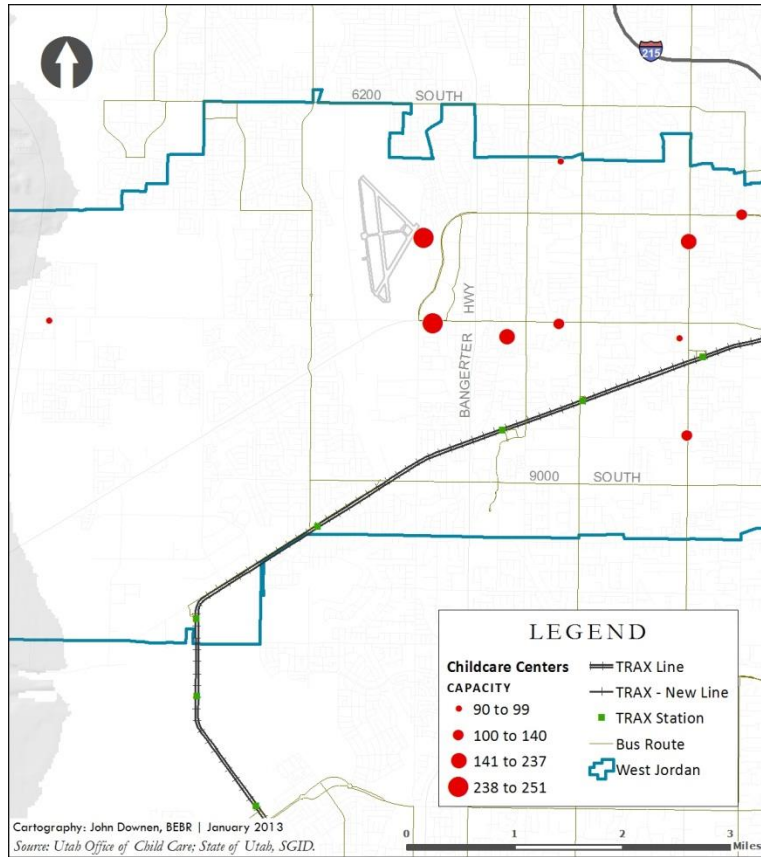
Figure 25
Opportunity Index by Census Tract in West Jordan



Though the aggregate opportunity in the city is about average, the individual tract opportunities vary greatly within the city itself. Figure 25 displays a map of all the census tracts in West Jordan and each individual opportunity score for each tract. Four tracts scored in the lowest possible category, three of which are surrounding the airport. The last one is in the farthest northeast corner, right on the boarder of Midvale. Almost the entire western half of the city scored between a 5 and 6 on the HUD opportunity score. Only one tract in the entire city scored a 9, located between Redwood Road and Temple Dr., which includes the Stonebridge apartments and shopping. The tract directly west also scored a 7 on HUD’s opportunity scale, showing the highest opportunity in West Jordan is in the southeast corner of the city by Sandy and South Jordan.

Figure 26 maps the active childcare centers in West Jordan by size. The larger the dot is on the map, the higher the maximum capacity of the center. Access to daycare can be considered an advantage in terms of fair and equitable housing as well as access to opportunity for many reasons. For one, if a household relies on low-wage jobs for stability, it is valuable to have affordable childcare so that adults are able to earn income for their families. Similarly, without access to childcare, more parents will be forced to stay at home with their children, thereby forgoing potential earned wages. Likewise the further the distance to childcare, the higher the time commitment and less time available to work and earn income. This is especially important for Hispanics, who on average have larger household sizes than their non-Hispanic white counterparts (Table 4). As a result, a lack of adequate childcare can restrict a family's mobility and time they can invest in opportunities outside the home. This can present an impediment to housing choice for minorities, larger families, and low-income households. As it can be seen in Figure 26, all of the childcare centers in West Jordan are located east side of the city. The two westernmost centers are just on the east side of the airport, in an area of low opportunity (Figure 25). In all cases, the centers relocated along public bus routes. However, there are large portions of the minority and low income populations living in the south central and western portions of the city, where there are virtually no bus routes connecting the city. This creates a major impediment to fair housing for the poor and minority residents, especially the poor Pacific Islanders, living south of the airport (Figure 13). Over a fifth of minority renters, who live in the new neighborhoods on the west side, do not have easy access to these facilities (Figure 8). Without adequate transportation to, or proximity to childcare facilities, the opportunities available to many protected classes are further reduced. As a result, more families, especially Hispanics, who on average have larger household sizes than others, need to live within a closer proximity to childcare facilities, oftentimes in lower opportunity tracts. This further exacerbates existing disparities in opportunity between lower-income minorities and more affluent non-Hispanic whites in the city.

**Figure 26
Childcare Centers in West Jordan, 2010**



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

As a further assessment of opportunity in West Jordan, an index is created as a representation of opportunity with K-12 public schools in Salt Lake County. This is done by summing two normalized, positive indicators: percent proficiency in language arts and science for elementary, middle and high schools. Subtracted from this indicator is the summation of four negative proxies for home environment and educational quality: free and reduced lunch percentage, percentage of minority students, percentage of students with limited English proficiency parents/guardians and average classroom size. Each school containing data on all of these indicators is then ranked based on their normalized index score by the county. From there, the ranking is split into decile ranks across the county, with a score of 10 representing the highest opportunity score. Overall, there are 204 schools with complete data on all the indicators, 20 of which are in West Jordan and four unranked schools (Table 19).

The scores range from the singular lowest score of 3 from Majestic School to the singular highest score of 8 at Hayden Peak School. The vast majority of schools scored a 5 or 6, which is right in the middle range of all schools in the county. The county rankings ranged from 54th to 155th with half of the schools ranking in above 100. Overall, the schools tend to rank near the average for the county,

much like HUD’s opportunity index (Table 18). Also, like the HUD’s opportunity index, there is still a great amount of variance within the city itself (Figure 25). Even though opportunity tends to aggregate toward the county average in West Jordan, that does not mean there is no discrimination in access to opportunity for people, specifically the protected classes in West Jordan. The ability to access opportunity within the city itself tends to vary quite a bit based on location within West Jordan.

Table 19
West Jordan School Opportunity

District	School	County Ranking	Opportunity Index
Jordan	Majestic School	155	3
Jordan	Columbia School	132	4
Jordan	Oquirrh School	129	4
Jordan	Heartland School	124	4
Jordan	West Jordan Middle	120	5
Jordan	Mountain Shadows School	119	5
Jordan	Riverside School	118	5
Jordan	Copper Hills High	116	5
Jordan	West Jordan High	112	5
Jordan	Westvale School	106	5
Jordan	West Jordan School	99	6
Jordan	Copper Canyon School	94	6
Jordan	West Hills Middle	93	6
Jordan	Terra Linda School	91	6
Jordan	Sunset Ridge Middle	89	6
Jordan	Oakcrest School	86	6
Jordan	Westland School	85	6
Jordan	Falcon Ridge School	84	6
Jordan	Jordan Hills School	79	7
Jordan	Hayden Peak School	54	8
Jordan	Joel P Jensen Middle	—	—
Jordan	Fox Hollow School	—	—
Granite	Jim Bridger School	—	—
Jordan	South Valley School	—	—

Source: BEBR computations from Utah State Office of Education data

The following six figures (Figure 27, Figure 28, Figure 29, Figure 30, Figure 31 and Figure 32) each depict most the elements of the school opportunity index, the exceptions being the addition of free and reduced lunch change from 2005-2011(Figure 28) and the exclusion of class size due to the small changes between schools. Not surprisingly, most of the non-Title I schools, and schools with little to no change in number of free and reduced lunch eligible students are on the west side of the city. Similarly, the west-side schools tend to have a lower rate of minority enrollemnts and students with limited English proficient parents/guadians. However, there are exceptions to these trends on both sides of the city. As a result, the language arts and science proficiencies for public schools in the ciy tend to be relatively homogenous around the city. Even though the school opportunity index range is quite large, from a score of 3 at Majestic School to an 8 at Hayden Peak School, a majority of the schools in the city lie in the mid-range, scoring a 5 or 6. Recalling the dispersion of the poor residents in the city from Figure 13, it comes as no surprise that there is little difference between the schools due to geographical location.

Figure 27
Free/Reduced Lunch Eligibility in West Jordan, 2011

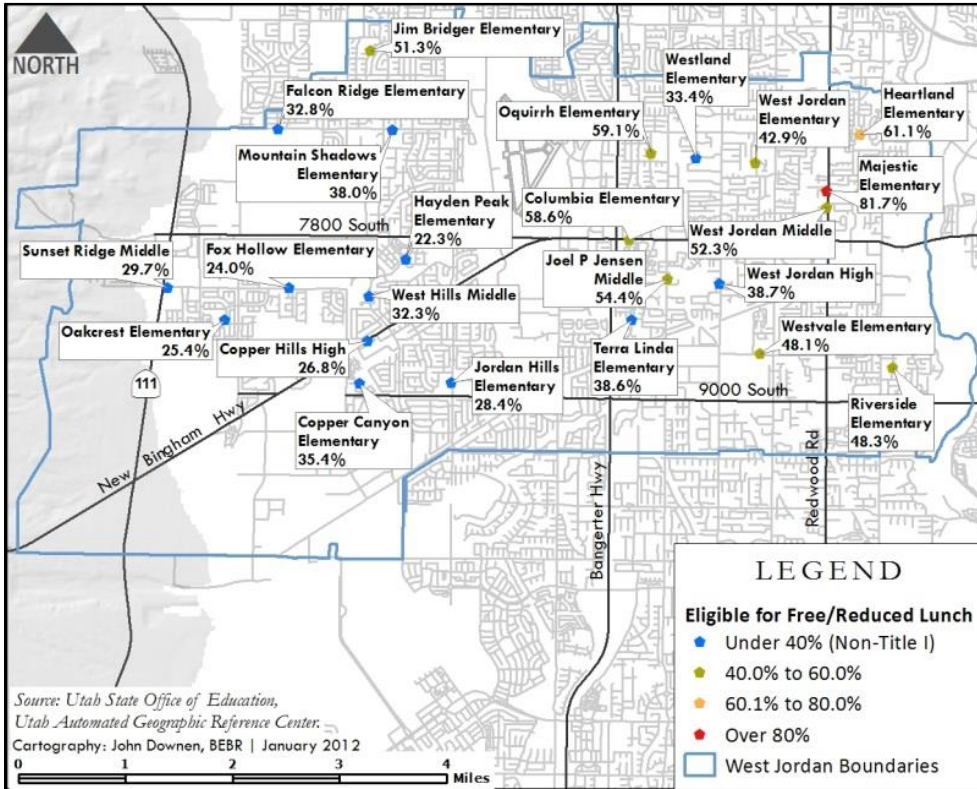


Figure 28
Free/Reduced Lunch Eligibility Change in West Jordan, 2005–2011

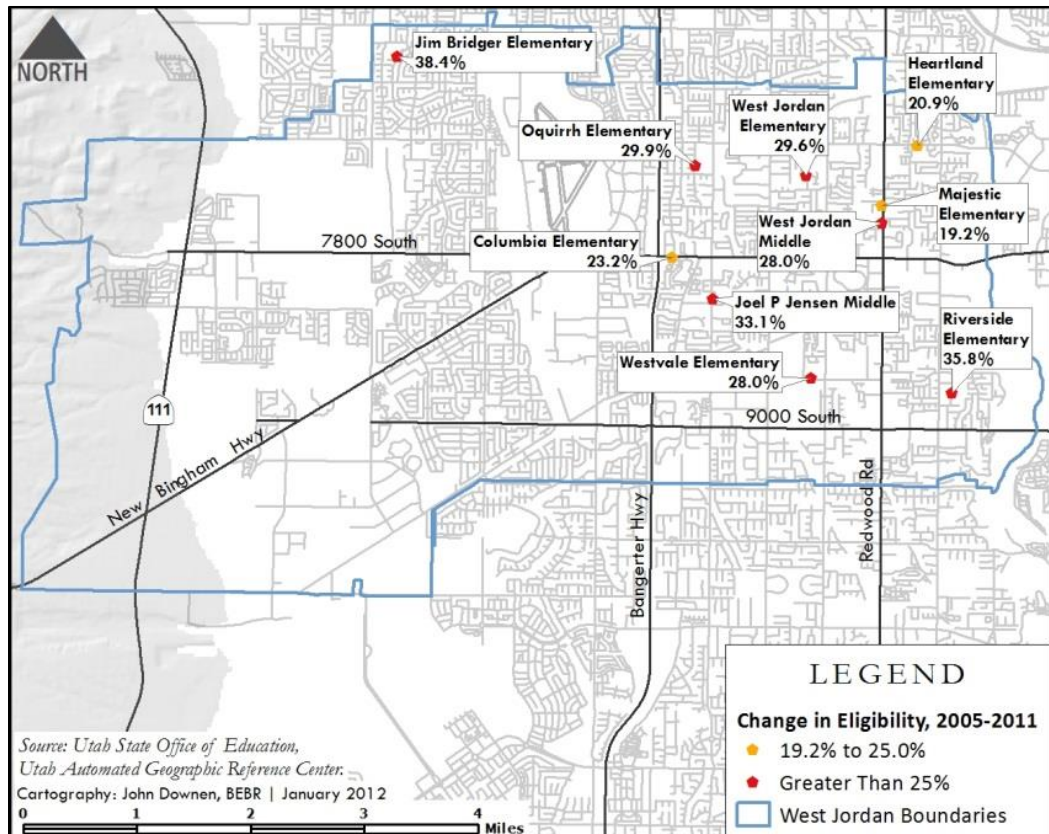


Figure 29
Share of Students Proficient in
Language Arts in West Jordan Public
Schools, 2011

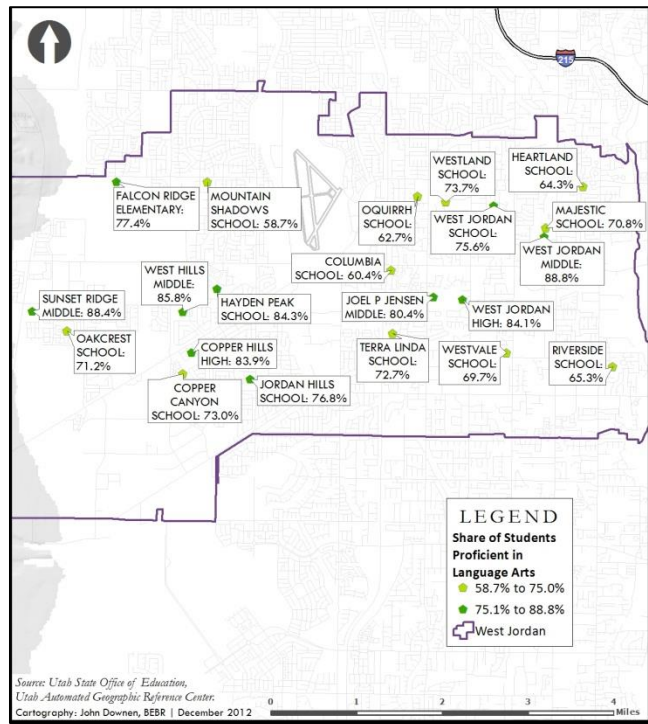


Figure 30
Share of Students Proficient in Science
in West Jordan Public Schools, 2011

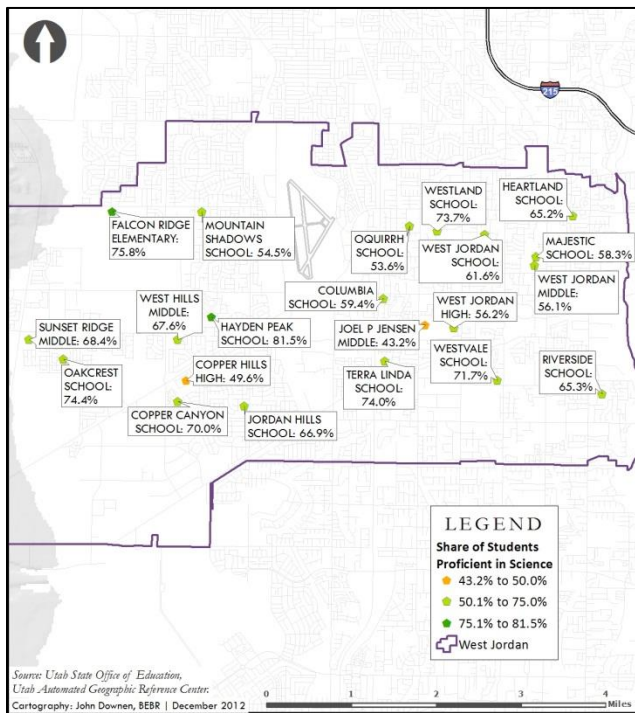


Figure 31
Minority Share of Enrollment in Public Schools in West Jordan, 2011

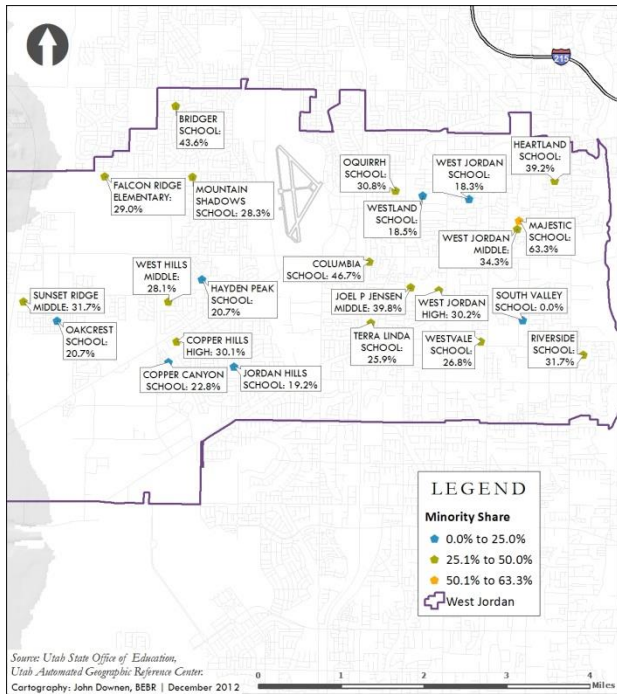
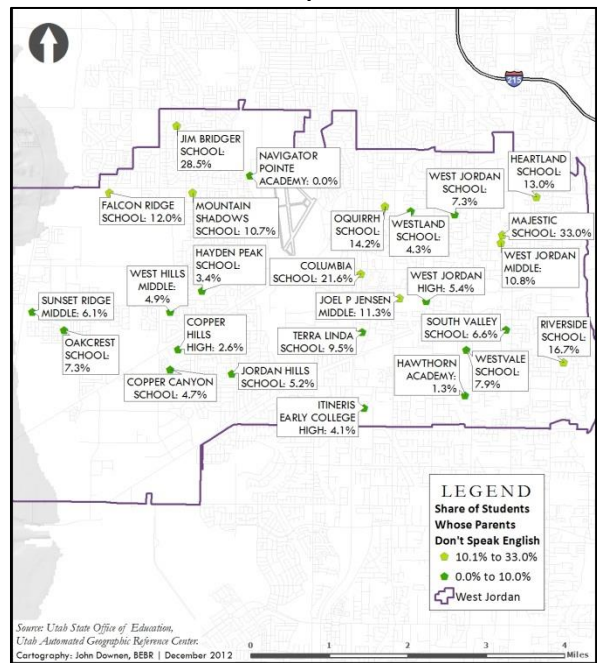


Figure 32
Share of Students with Parents of Limited English Proficiency in West Jordan, 2010



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

Table 20
Enrollment Percentage by Race in Public Schools, 2011

School	Minority	African Am or Black	American Indian/ Alaskan Native	Asian	Hispanic/ Latino	Multi- Race	Pacific Islander
West Jordan School	18.3%	0.7%	0.7%	0.7%	11.9%	2.7%	1.4%
Fox Hollow School	18.3%	1.0%	0.5%	2.4%	11.5%	2.2%	0.8%
Westland School	18.5%	0.3%	0.3%	1.1%	9.9%	3.3%	3.6%
Jordan Hills School	19.2%	0.8%	1.0%	2.2%	9.3%	3.2%	2.6%
Oakcrest School	20.7%	0.2%	0.6%	0.7%	15.0%	2.3%	1.8%
Hayden Peak School	20.7%	1.1%	0.3%	2.4%	12.0%	3.2%	1.7%
Copper Canyon School	22.8%	1.5%	0.6%	2.6%	12.0%	3.9%	2.1%
Terra Linda School	25.9%	0.4%	1.6%	1.4%	18.1%	2.7%	1.8%
Westvale School	26.8%	1.4%	0.7%	1.6%	18.3%	2.6%	2.2%
West Hills Middle Mountain Shadows School	28.1%	1.1%	0.9%	2.6%	18.1%	3.6%	1.7%
Falcon Ridge School	28.3%	0.7%	0.1%	2.3%	19.2%	2.4%	3.6%
Copper Hills High	29.0%	1.2%	0.7%	2.3%	18.7%	2.7%	3.5%
West Jordan High	30.1%	1.3%	0.6%	2.7%	20.8%	3.3%	1.4%
Oquirrh Hills School	30.2%	1.2%	0.7%	1.9%	20.9%	3.7%	1.7%
Riverside School	30.8%	1.2%	0.4%	1.0%	22.7%	2.3%	3.1%
Sunset Ridge Middle	31.7%	1.5%	0.5%	2.4%	24.6%	1.2%	1.5%
West Jordan Middle	31.7%	1.0%	0.6%	1.9%	22.9%	3.2%	2.2%
Heartland School	34.3%	0.9%	0.8%	3.2%	24.7%	2.5%	2.2%
Joel P Jensen Middle	39.2%	2.7%	1.2%	3.4%	24.1%	3.6%	4.1%
Jim Bridger School	39.8%	2.2%	0.5%	2.1%	27.2%	4.0%	3.8%
Columbia School	43.6%	2.0%	1.5%	2.0%	34.6%	1.7%	1.7%
Majestic School	46.7%	1.1%	0.7%	2.3%	37.6%	3.7%	1.3%
West Jordan Totals	63.3%	1.2%	2.1%	0.6%	53.6%	1.8%	4.1%
	29.5%	1.2%	0.7%	2.1%	20.3%	3.0%	2.2%

Source: BEBR Computations from Utah State Office of Education Data

The enrollment data from the Utah State Office of Education from the years 2006-2007 and 2010-2011 provides information on ethnicity enrollments in Salt Lake County public schools. The data came from the Superintendent's Annual Report for each respective year, and were then matched based on school name, district and location. From there, the data was separated by city, and in some cases by township. If a school is not located inside an incorporated city, or one of the two townships, Kearns or Magna, then they are included in the analysis for the closest city to their physical location. While the data sets from each year is not organized or collected in the exact same manner, they are still comparable. For example, in 2007, there is a category for "unknown" ethnic/racial identity, whereas in 2011 there is no "unknown category" but there is a "multi-race" category. These

two classifications cannot be assumed to be the same, as someone who claims to be “unknown” is not necessarily a multi-race individual. However, both of these categories were used in the calculation for total enrollments and total minority enrollments in each respective year.

In West Jordan, there are 23 schools that were included in both the 2007 and 2011 Superintendent’s Annual Report and are therefore in this analysis. Fox Hollow School and Falcon Ridge School both opened post-2007, but are still used to calculate city overall totals, while South Valley School is a special education school that did not report any enrollment data in 2011 and is excluded. Overall, West Jordan overall experienced a relatively low increases in total enrollments between 2007 and 2011, but fairly high increases in minority enrollments. This shows a clear change in the demographics of West Jordan schools becoming more populated with minority students, less dominated by the non-Hispanic white population. Figure 33 displays the absolute change in minority enrollments by ethnicity in elementary, middle and high schools in West Jordan. Decreases in enrollments were mostly confined to the non-Hispanic white population, though blacks saw a minor decrease of 18 enrollments in elementary schools. By far, the largest increases in student enrollments were among Hispanic students with steady enrollment increases across all levels of school. Enrollment changes in other ethnicities only experienced minimal changes, each by less than 40 students.

Figure 33
Total Minority Enrollment Changes, 2007–2011

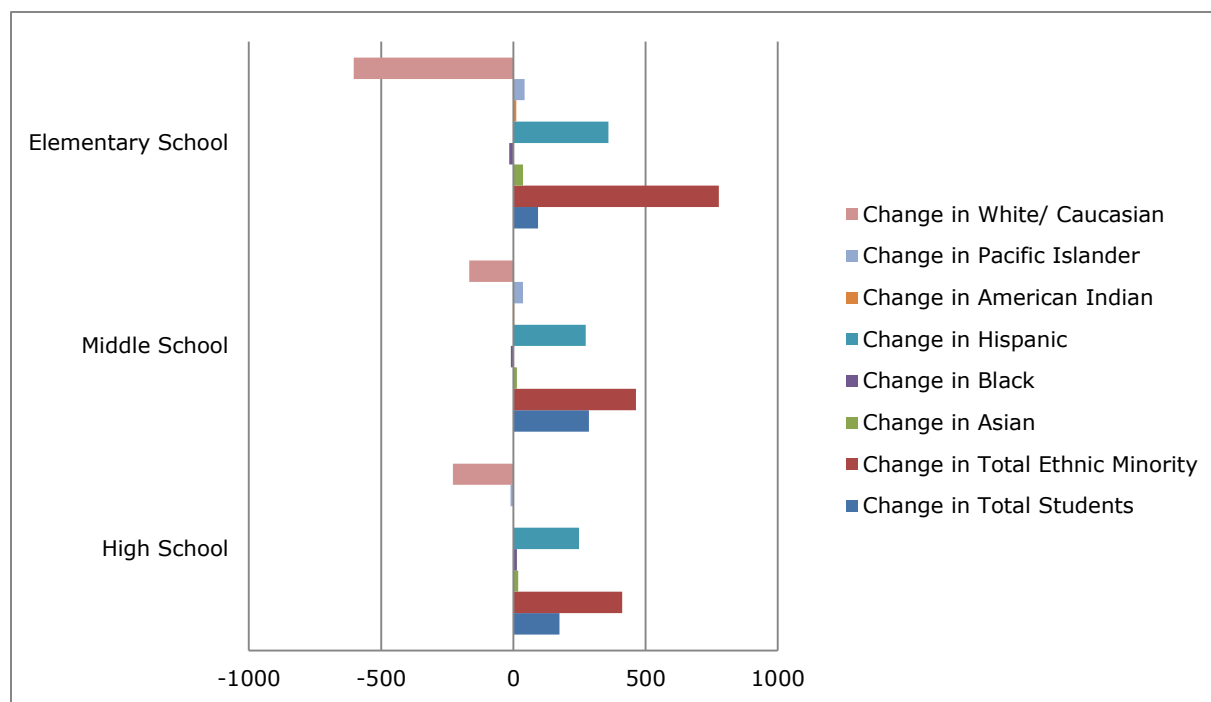
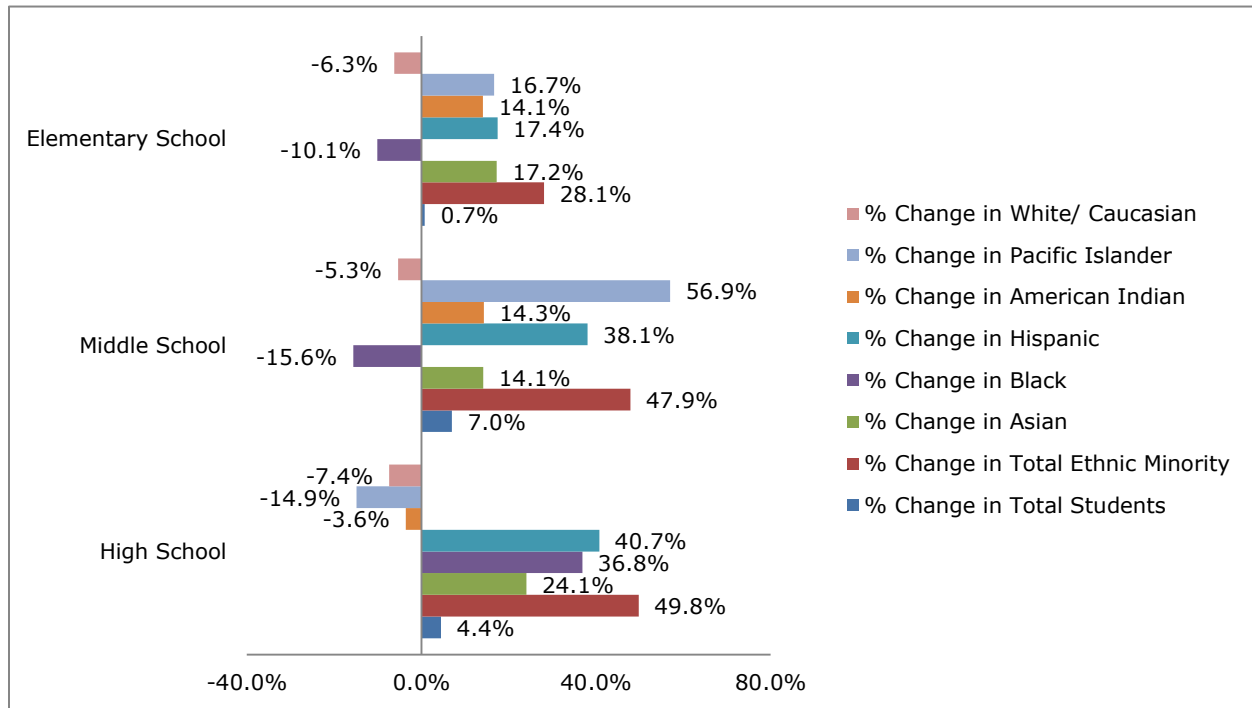


Figure 34 on the other hand displays the percentage change of each ethnic group in all public elementary, middle and high schools in West Jordan. Though the non-Hispanic white enrollments decreased in the highest numbers, they experienced some of the smallest percentage changes. It is important to note the higher-percentage changes in other ethnicities in West Jordan are due to relatively low numbers of minority students overall. Nonetheless, the second most populous ethnicity

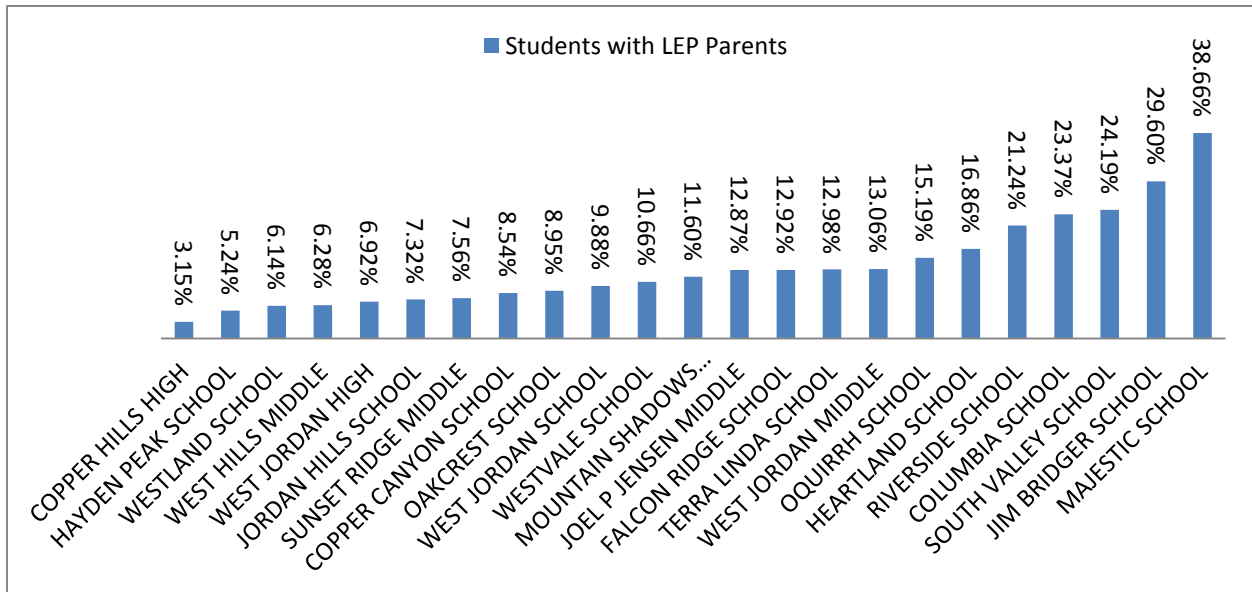
in the city is Hispanic/Latino students, which experienced a 57 percent increase in West Jordan middle schools. Nonetheless, it is clear the minority enrollments are an increasingly large share of the overall student enrollment growth and a growing share of the overall student body.

Figure 34
Minority Enrollment Percentage Change, 2007–2011



In accordance with Title VI of the Civil Rights Act of 1964, HUD recognizes persons who, as a result of national origin, do not speak English as their primary language and have a limited ability to read, write, or understand the language. As the major metropolitan center of the state, Salt Lake County must account for the percentage of Limited English Proficiency, or LEP, persons living in the county. According to data from the county’s public schools, there are concentrated areas of both high and low numbers of LEP households. The city has significantly more schools than any of the more southern cities, containing 23 total public schools. There are 17 elementary schools, four junior highs and two high schools. The percent of students with LEP parents at each school is bounded on the low end of roughly 3.2 percent at Copper Hills High School to the high end of 38.6 percent at Majestic Elementary School. The distribution of percentages of LEP parents at each school can be seen in Figure 35. Similar to the other cities in the middle of Salt Lake County, West Jordan schools report relatively low to middle ranges of percentage of students with LEP parents.

Figure 35
Percent of Students with LEP Parents, 2010



The following two maps depict home values in West Jordan, where Figure 36 depicts the median home value by tract, and Figure 37 depicts the assessed value of detached single family homes from 2011. The general trend in the city is the further west the tract, the higher the home values. The two main exceptions are the easternmost tract which has a median home value of over \$40,000 more than its neighboring tracts, and the westernmost tract, where the median home price dips a bit compared to its eastern neighbors. Overall, the range of home prices is quite wide from under \$150,000 in some neighborhoods to up over \$400,000 in others. There are quite a few pockets of both high-valued and low-valued homes in the city. However, the largest concentration of low-valued homes is north of 7800 South, especially up around the South Valley Regional Airport. However there are other concentrations along Redwood Road, Bangerter, and the Day-break TRAX line. None of these areas of low-valued homes is surprising, considering these are also the areas of concentrations for poor residents (Figure 13), subsidized apartment projects (Figure 18) and Section 8 Voucher holders (Figure 19). Overall, these patterns could indicate a pattern of discrimination in that low income households are restricted to these areas of lower home values and lower opportunity (Figure 25) due to the inability to find adequate affordable housing to accommodate their needs.

Figure 36
Median Home Value by Tract in West Jordan, 2011

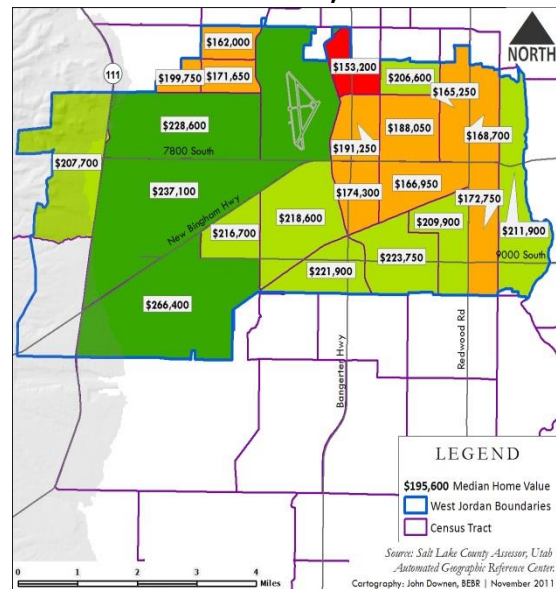
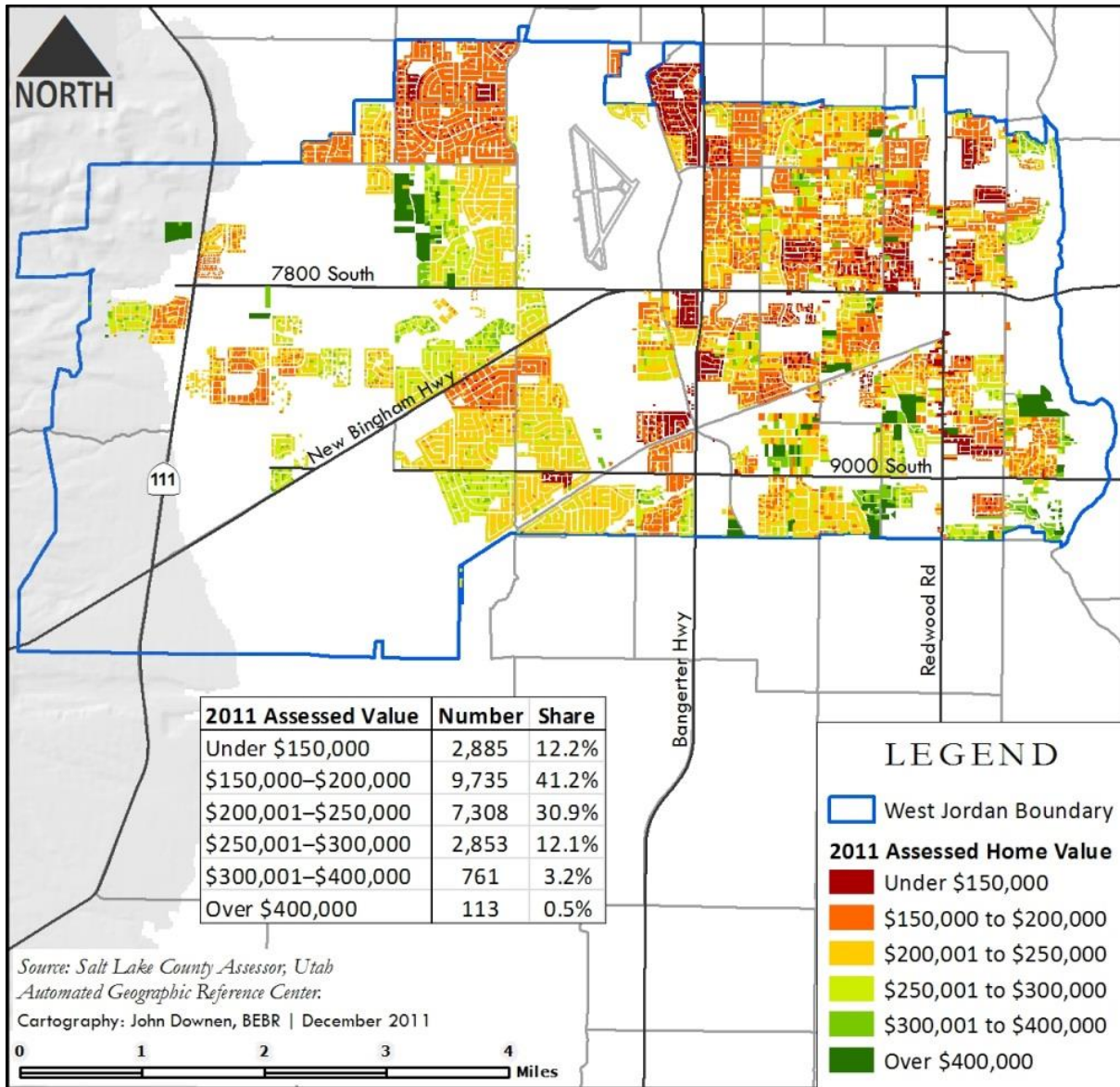


Figure 37
Assessed Value of Detached Single Family Homes in West Jordan, 2011



Foreclosed homes not only have a negative effect on the residents who lost their homes, but can also negatively affect neighboring homes and real estate values in the area. Table 21 estimates the percentage of the owned housing stock that was foreclosed in the last few years for Salt Lake County. The calculations use total foreclosures between 2008 and 2012 from the Wasatch Regional Front Multiple Listing Service, and the total owned homes from the 2010 U.S. Census as the best approximation of the total housing stock in a zip code. An aggregate of all zip codes in West Jordan yields an approximate share of the housing stock in foreclosure of 2.7. Though this foreclosure rate is not much higher than that of the county aggregate of all ZCTAs, the zip codes in West Jordan do vary widely. The lowest foreclosure rate of less than one percent in 84081 is more than three percentage points lower than the highest rate in zip code 84084.

**Table 21
Foreclosed Homes in Salt Lake County, 2008–2012**

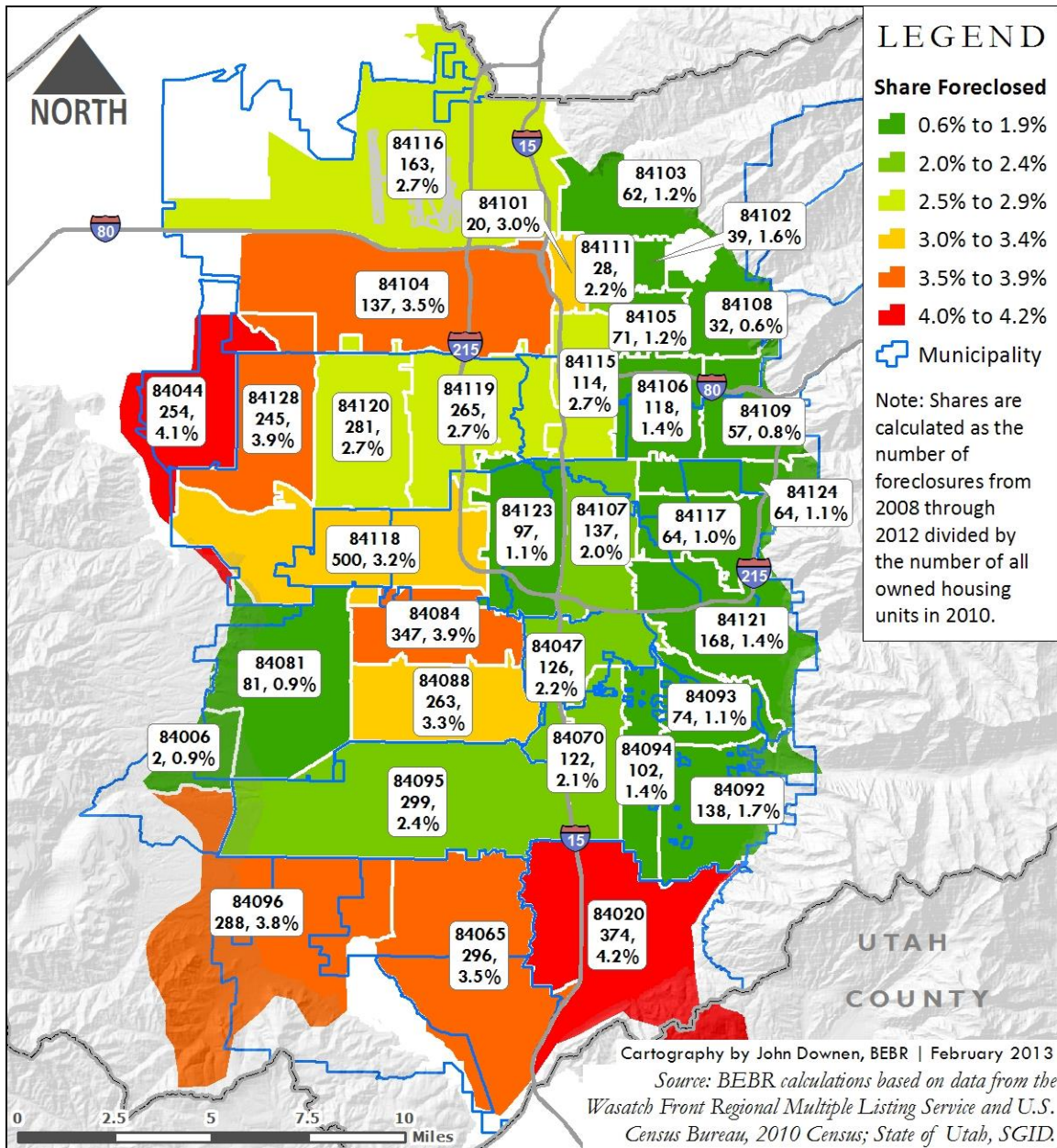
City	Zip Code Tabulation Area	Total Owned Units	Total Foreclosures for 2010 ZCTA (2008-2012)	Share of Foreclosed Homes
Bluffdale/Riverton	84065	8534	296	3.47%
Cottonwood Heights (and Big Cottonwood)	84121	11692	168	1.44%
Draper	84020	8852	374	4.23%
Herriman	84096	7597	288	3.79%
Holladay	84117	6588	64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

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

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

Figure 38 maps the share of the foreclosed homes in each zip code in Salt Lake County, based on the 2010 owned housing stock and Zip Code Tabulation Areas (ZCTAs) from the U.S. 2010 Census. The variance among the zip code foreclosure rates in West Jordan is quite wide. Though the trend in the county is the more eastern a zip code is located, the lower the foreclosure rate, the opposite is true within the city of West Jordan. In fact the housing market seems more stable on the west side than in the two zip codes on the eastern half. However, this is not surprising considering the relative location of both minorities (Figure 17) and low-income residents in the city (Figure 13). Overall, it seems the members of the protected classes are concentrated in the areas with higher foreclosure rates and therefore lower-valued homes.

Figure 38
Share of Foreclosed Owned Housing Units, 2008–2012



Lending Practices

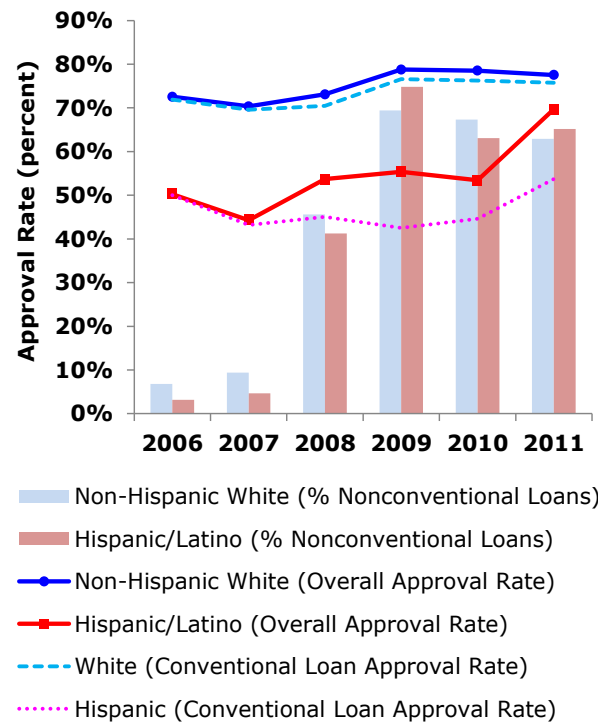
- Approval/
Denial
Rates
(Figure 40)
- With the exception of 2011, during which Hispanic/Latino approval rates reached 70 percent, the Hispanic-white gap was consistently around 20-25 percentage points from 2006 to 2010.
 - Despite the dramatic shift to nonconventional loans since 2008, the conventional loan approval rate for white applicants only slightly trailed behind the overall approval rate. However, the 6-year conventional loan approval rates for Hispanic/Latino applicants have diverged from the overall approval rate after 2007.

- High-Interest
Loans
(Figure 39)
- The overall percentage of high-interest loans given to Hispanic/Latino approved applicants from 2006 to 2011 was 38 percent—more than triple the rate for white applicants.
 - The gap between the percent of high-interest loans given to Hispanics and whites does not close even at the highest income levels.

- Neighborhood
Selection
(Figure 44)
- West Jordan has a few remaining census tracts that have less than 20 percent minority share in 2010. Only 10 percent of the Hispanic applications in 2008 were for properties in these census tracts, trailing behind their white counterparts by 7.4 percentage points.
 - However, this rate for Hispanic applicants soared to 26 percent in 2011, even surpassing the rate of white applicants. This shift in neighborhood selection could signal an increase in minority share in these relatively homogeneous areas.

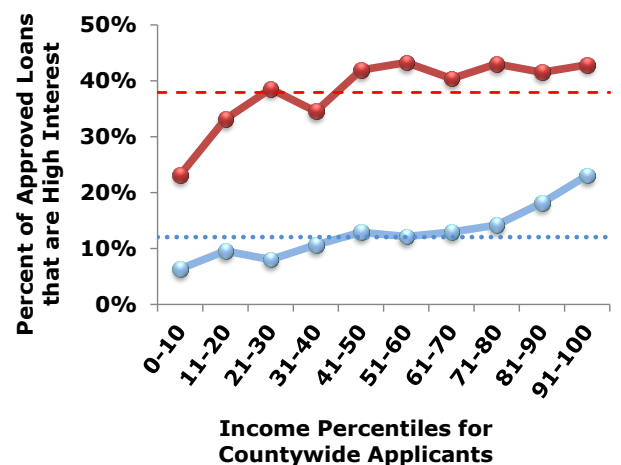
- Applicant
Income &
Loan
Amount
(Figure 42)
- The reported applicant median incomes for both groups have fallen in tandem from 2007 to 2010.
 - While the median loan amount for both groups was comparable from 2006 to 2009, Hispanic applicant median loan amounts have since fallen more rapidly than those of their white counterparts.

Figure 39
Approval Rates
(Total and Conventional Loans)
with Loan Type Composition
West Jordan, 2006–2011



Source: HMDA LAR Raw Data by MSA (2006-2011)

Figure 40
Percent of High-Interest Loans
by Income Level
West Jordan, 2006–2011

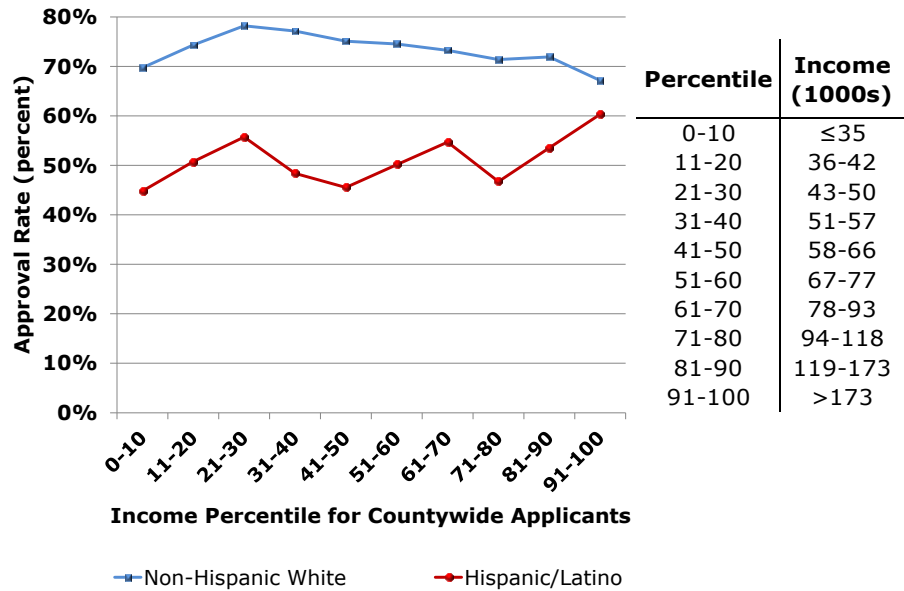


Source: HMDA LAR Raw Data by MSA (2006-2011)

The income percentiles were determined from the entire Salt Lake County HMDA dataset from 2006-2011. Refer to Figure 41 for the corresponding income levels in nominal amounts.

The disparities in approval rates between non-Hispanic white and Hispanic/Latino applicants cannot be explained by differences in income distributions. Figure 41 shows the approval rates by income level. The percentiles shown on the horizontal axis represent nominal dollars that are constant across both groups, since these percentiles were determined from the entire Salt Lake County Home Mortgage Disclosure Act (HMDA) 2006–2011 dataset. The corresponding income levels for each income decile can be found on the table in Figure 41.

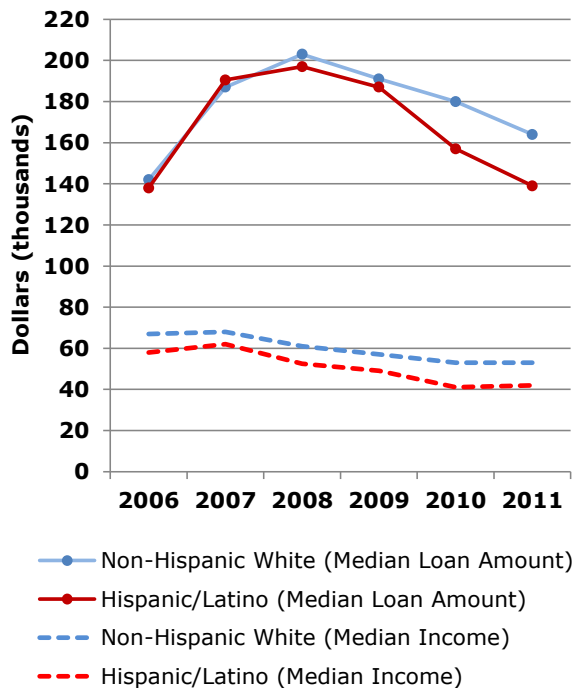
Figure 41
Approval Rates by Income Level and Race/Ethnicity
West Jordan, 2006–2011



Source: HMDA LAR Raw Data by MSA (2006-2011)

Note: The percentiles are determined from the reported incomes of all applicants in the entire Salt Lake County HMDA dataset from 2006 to 2011. The table above shows the correspondence between the percentiles and the income in nominal dollars.

Figure 42
Median Loan Amount and Income
of Approved Applicants
West Jordan, 2006–2011



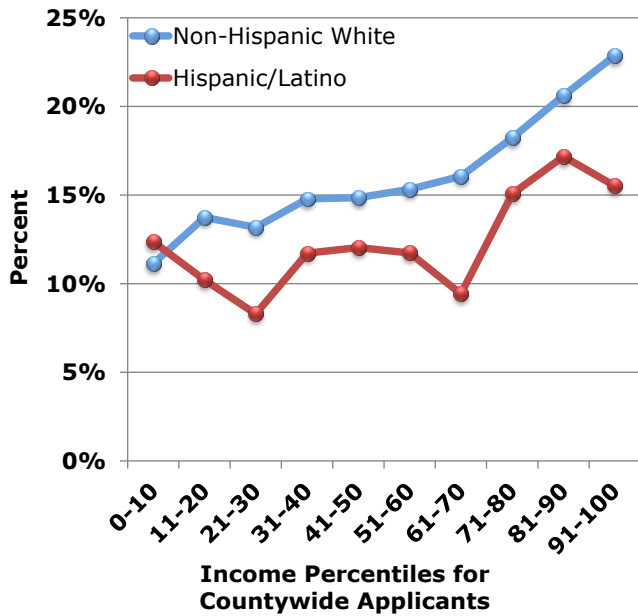
For nearly all income levels, the overall 2006–2011 approval rate for non-Hispanic whites hovered near or above 70 percent. On the other hand, the Hispanic/Latino approval rate does not reach 60 percent other than for the highest income decile (greater than \$173,000). Even at this highest income level, the approval rate gap does not completely close between the two groups.

Compared to other cities, West Jordan has relatively comparable median incomes between the two groups, although the gap is widening. As shown in Figure 42, the Hispanic/Latino reported median applicant income has trailed behind that of their white counterparts by \$6,000 in 2007, which then doubled to \$12,000 in 2010.

On the other hand, while both groups had comparable median loan amounts from 2006 to 2009, Hispanic/Latino applicants had a median loan amount that was \$25,000 less than that of their white counterparts in 2011.

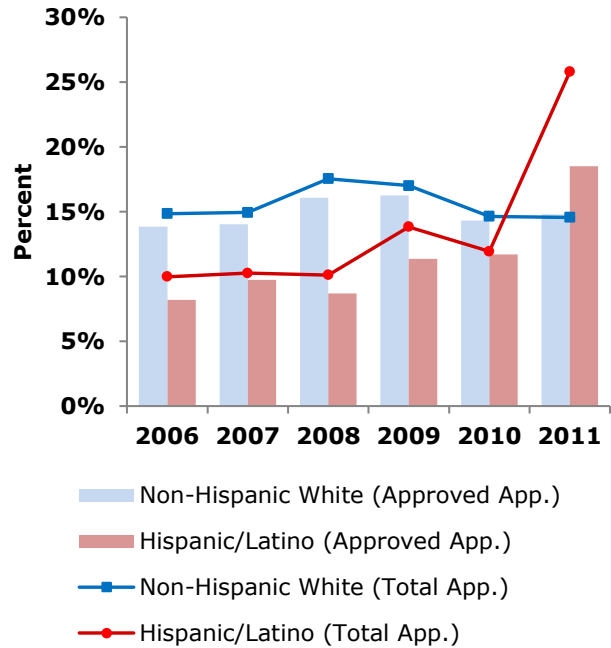
Source: HMDA LAR Raw Data by MSA (2006-2011)

Figure 43
Percent of Applications for Properties in Census Tracts with Less Than 20% Minority Share in West Jordan, 2006–2011



Source: HMDA LAR Raw Data by MSA (2006-2011)

Figure 44
Percent of Total/Approved Applications for Properties in Census Tracts with Less Than 20% Minority Share in West Jordan, 2006–2011



Source: HMDA LAR Raw Data by MSA (2006-2011)

A potential reason for the widening loan amount gap between the two groups could be that Hispanic/Latino applicants are selecting more affordable properties in particular neighborhoods. While West Jordan does not have any distinctive infrastructural border that demarcates racial segregation and disparities, a few census tracts with less than 20 percent minority share were selected to test if Hispanic/Latino applicants were disinclined to apply for properties in those areas. The selected census tracts are those with less than 20 percent minority share as shown in Figure 4 with a few exceptions.¹ These census tracts with less than 20 percent minority will hereafter be referred to as homogeneous areas for the sake of brevity.

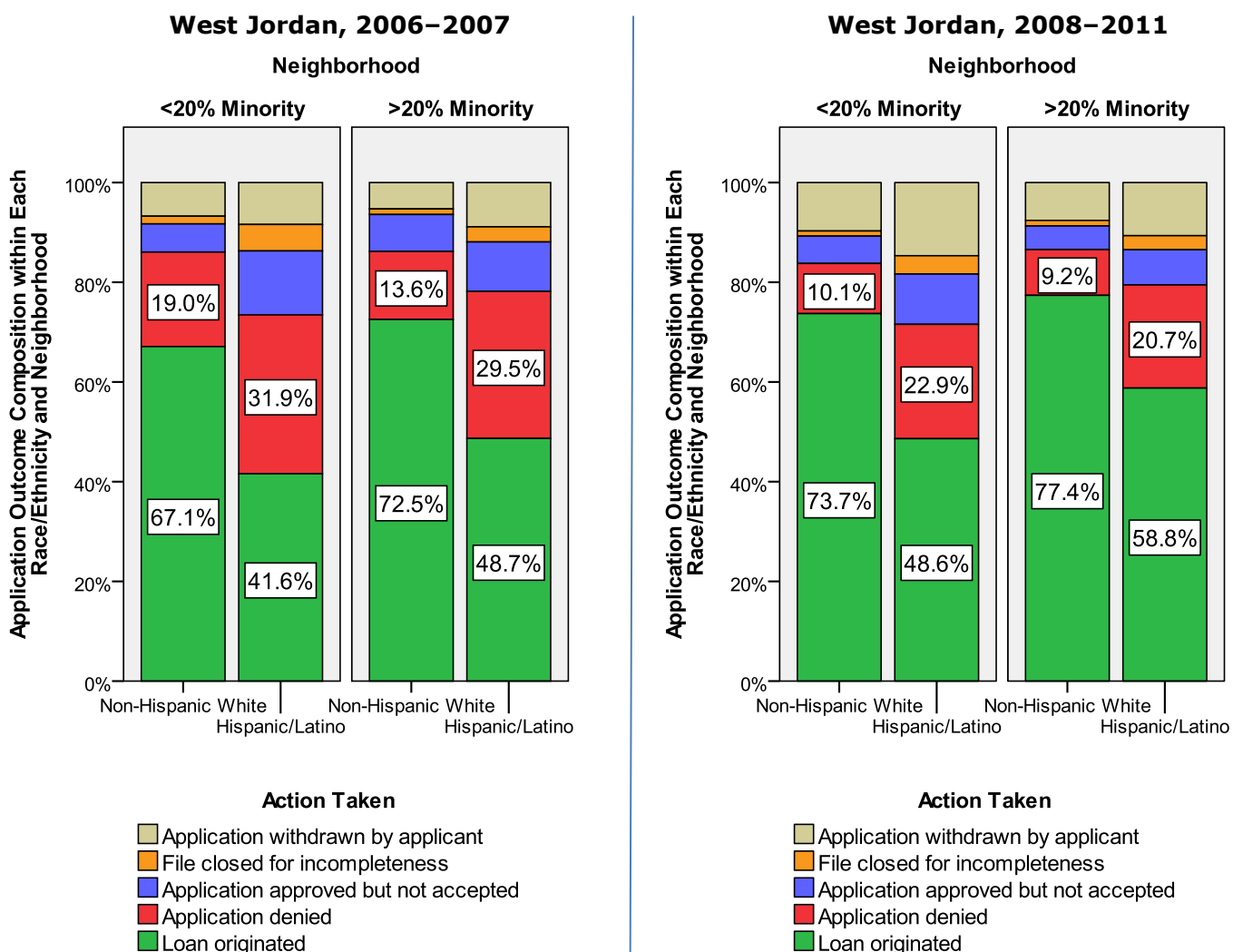
Figure 43 shows that the percent of West Jordan applications for properties in these homogeneous areas generally increase with income level. For instance, while only 11 percent of white applicants at the lowest income decile (earning less than \$35,000/year) applied for properties in homogeneous

¹ The selection of homogeneous areas was based on the 2010 minority share of the census tract populations in West Jordan. The HMDA data are geocoded using 2000 census tracts, so some exceptions exist when dealing with boundary changes. In cases in which a 2000 census tract was split into two 2010 census tracts, the entire 2000 census tract was selected as a homogeneous area if the combined minority share of the two split 2010 census tracts was less than 20 percent. There were two instances of split census tracts in West Jordan. One southwestern 2000 partial census tract was split into two 2010 census tracts. This 2000 census tract was not selected as a homogeneous area, since the combined minority share of the two split 2010 census tracts (27.7 and 19.0 percent) was 22.9 percent. Another 2000 census tract on the southern end of the city just west of Redwood Road was split in 2010. This census tract was selected, since the combined minority share of the two split 2010 census tracts (15.5 and 22.6 percent) was 19.5 percent.

areas, the rate doubles to nearly 23 percent for white applicants at the highest income decile (earning more than \$173,000/year). However, Hispanic/Latino applicants select properties in homogeneous areas at lower rates than their white counterparts for nearly all income levels. The higher volatility in the neighborhood selection rates across income levels for Hispanic applicants is due to the relatively small application volume among Hispanics.

Figure 44 shows the neighborhood selection effect from 2006 to 2011 for both groups by total applications and approved applications. Notably, the Hispanic/Latino application rate for properties in homogeneous areas more than doubled from 12 percent in 2010 to 26 percent in 2011. This surge could partly be attributed to the small Hispanic application volume but might also signal a shift in neighborhood selection that might increase the minority shares of these homogeneous areas in the future. As shown in Figure 44, the approval process has in fact widened the neighborhood selection gap between the two groups from 2006 to 2010 given the lower Hispanic share of approved loans compared to total loans for properties in homogeneous areas. Despite having 26 percent of Hispanic West Jordan applications in homogeneous areas in 2011, only 18.5 percent of Hispanic/Latino approved loans were for properties in these areas. This disproportionately lower

Figure 45
Mortgage Application Outcomes by Race/Ethnicity and Neighborhood, and Housing Period



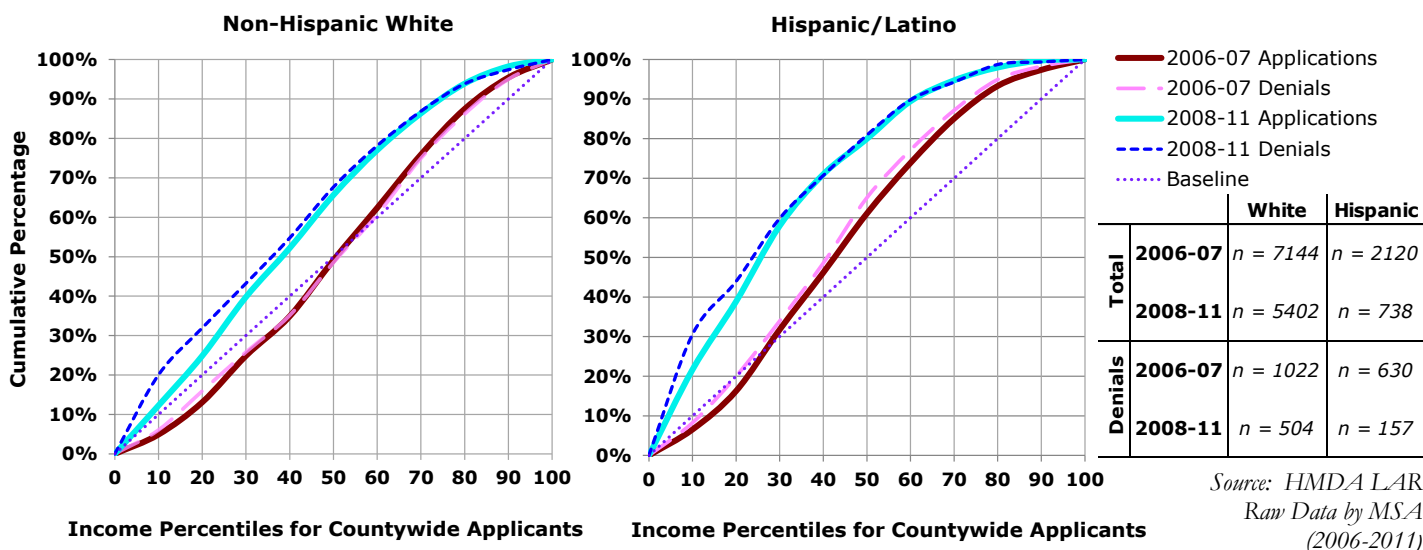
Source: HMDA LAR Raw Data by MSA (2006-07)

Source: HMDA LAR Raw Data by MSA (2008-11)

Hispanic share of approvals for properties in homogeneous areas (Figure 44) is also reflected in the application outcomes across neighborhoods by race/ethnicity as shown in Figure 45. The left-hand panel shows the overall application outcomes during the housing boom from 2006 to 2007. The right-hand panel shows the application outcomes during the housing bust from 2008 to 2011. Each panel disaggregates the application outcomes by neighborhood (based on minority share of census tracts) and race/ethnicity.

The 2008–2011 approval rate gap between the two groups for properties in the homogeneous areas was 25 percentage points—comparable to the gap in both neighborhoods during the housing boom from 2006 to 2007. On the other hand, the 2008–2011 approval rate gap between the two groups was slightly lower at 18.6 percentage points for the areas with minority shares greater than 20 percent. Thus, even as approval rates have increased since the end of the housing boom for both groups—mostly due to the increase in nonconventional loans—the approval rate gap between the two groups did not close in the homogeneous areas. From 2008 to 2011, Hispanic/Latino applicants had an approval rate of 59 percent in diverse areas (greater than 20 minority share), compared to only a 49 percent approval rate in homogeneous areas.

Figure 46
Cumulative Distribution of Applications and Denials across Income Levels by Race/Ethnicity in West Jordan, 2006–2011



The income percentiles were determined from the all applicants with reported incomes in the Salt Lake County HMDA dataset from 2006-2011. Thus, the income percentiles represent constant income levels for both groups. Please refer to Figure 41 on page 50 for the corresponding income levels in nominal dollar amounts.

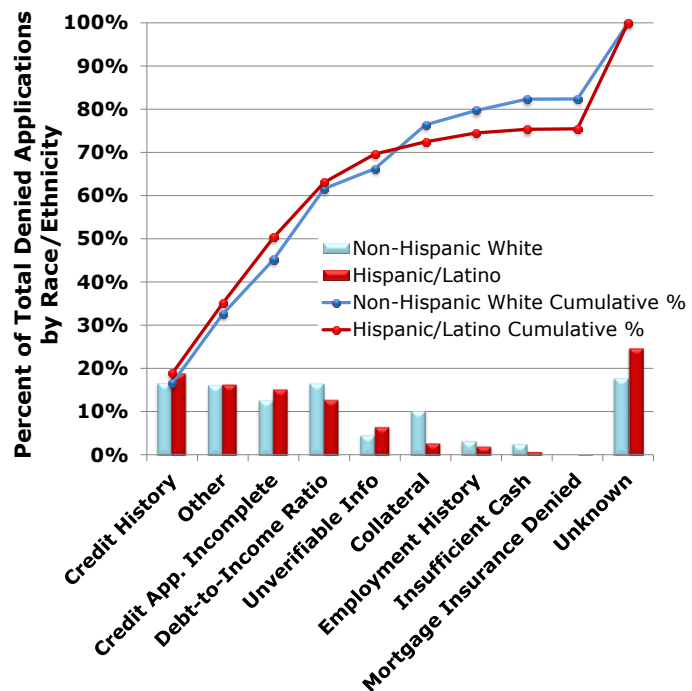
Figure 46 shows the cumulative percentage of total applications and denials across income levels by race/ethnicity and housing periods. The purple dotted line is the baseline, meaning that curves that approach the shape of this baseline have distributions similar to the overall reported income distribution of all applications in Salt Lake County in the HMDA dataset from 2006 to 2011. Cumulative application distributions for a subpopulation above the baseline suggest that this group has more applicants in the lower income deciles compared to the entire 2006 to 2011 Salt Lake County HMDA dataset. Likewise, cumulative application distributions below the baseline mean that the group has more applicants in higher income deciles.

The two panels in Figure 46 each overlay the cumulative application distributions (solid lines) with the corresponding cumulative denial distributions (dashed lines) for the two housing periods. For both non-Hispanic white and Hispanic/Latino applications, the distributions have skewed more to the lower income levels after the housing boom. During the housing boom from 2006 to 2007, the cumulative denial distributions for both groups did not deviate significantly from the cumulative application distributions. This means that applicants were not disproportionately denied mortgage loans solely on the basis of income. Thus, the higher denial rates among Hispanic/Latino applicant cannot be explained simply in terms of income disparities across racial and ethnic groups.

Interestingly, during the housing bust from 2008 to 2011, the cumulative denial distribution (dashed dark blue line) for both groups was more skewed toward the lower income group than the cumulative application distribution (solid light blue line). For instance, while 20 percent of non-Hispanic white denied applicants were in the lowest income decile, only 12 percent of the total white applicants reported incomes at this level. Similarly, nearly 31 percent of Hispanic/Latino denied applicants were in the lowest income decile, but only 22 percent of total Hispanic applicants were in this income bracket. For both groups, the gap between the two cumulative distribution curves closes near the 30th income percentile. Thus, despite the higher approval rates for both groups during the housing bust period with the surge in nonconventional loans, the denials have shifted more disproportionately to applicants at the lowest income level. However, since this shift occurred for both groups, income disparities across racial and ethnic groups still cannot explain the higher denial rates among Hispanic/Latino applicants. Additional information such as credit history would need to be investigated in order to understand the approval and denial rate gaps.

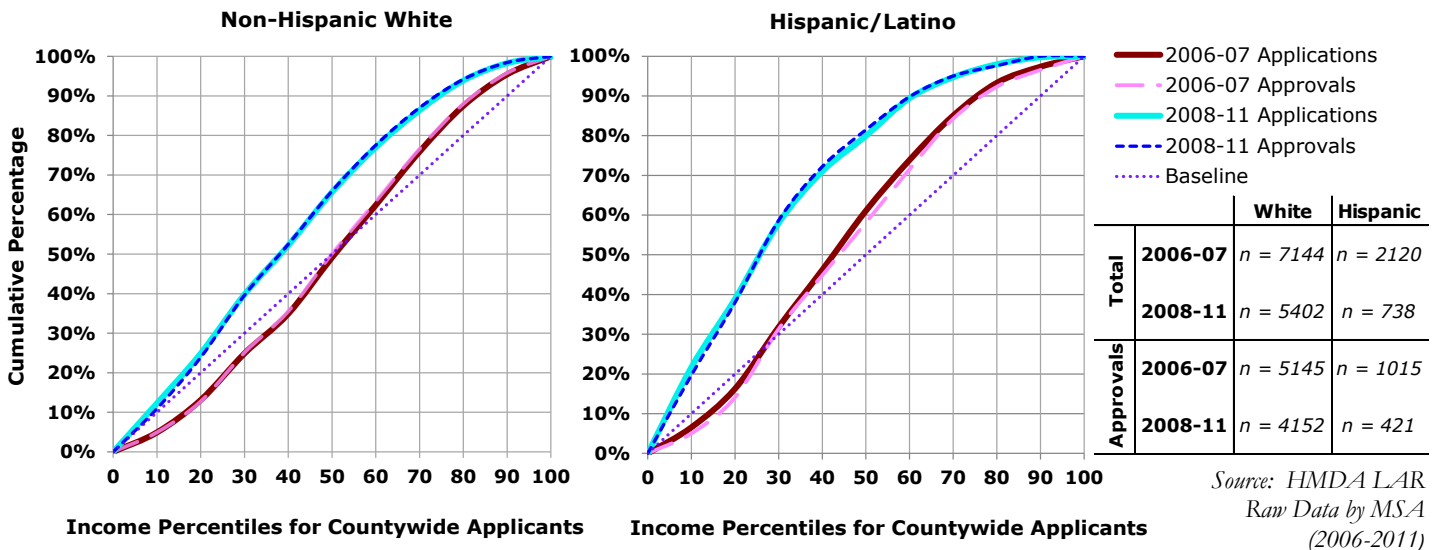
The HMDA dataset includes reasons for denied mortgage applications. Figure 47 shows the percent of denied applications by race/ethnicity attributed to each denial reason. The denial reasons are ordered from the most to least common denial reason among Hispanic/Latino applicants with the exception of categorizing all denied applications with unreported reasons at the end. The line graphs in Figure 47 show the cumulative percentage aggregated in the order of the denial reasons that are listed on the horizontal axis. Roughly 46 percent of the denials for both groups are due to poor credit history, high debt-to-income ratios, and incomplete credit applications. Unfortunately, 18 percent and 25 percent of the denied applications for whites and Hispanics, respectively, do not have reported reasons, making it difficult to develop conclusive analysis on the denial reasons across racial and ethnic groups.

Figure 47
Primary Denial Reason by Race/Ethnicity in West Jordan, 2006–2011



Source: HMDA LAR Raw Data by MSA (2006-2011)

Figure 48
Cumulative Distribution of Applications and Approvals by Income and Race/Ethnicity in West Jordan, 2006–2011



The income percentiles were determined from the all applicants with reported incomes in the Salt Lake County HMDA dataset from 2006-2011. Thus, the income percentiles represent constant income levels for both groups. Please refer to Figure 41 on page 50 for the corresponding income levels in nominal dollar amounts.

Note that the cumulative income distributions among approved and total applications for both groups are fairly comparable as shown in Figure 48. This means that approvals are not disproportionately concentrated among applicants in the higher income brackets. This similarity in both distributions is also reflected in the indices of dissimilarity between total applications and the approved subset, which have been below 0.05 for both groups (Table 22).

The index of dissimilarity (Table 22) measures the extent to which the income distributions of approved and denied applicants differed from the income distribution of total applicants. The indices are interpreted as the proportion of applicants that must move to another income decile in order to make the overall distribution and the approval/denial distributions identical. The Index of Dissimilarity section has a detailed explanation of this metric.

For both groups, the index of dissimilarity doubled from the housing boom to housing bust period given the emergence of disproportionately high percentage of denials attributed to applicants at the lowest income as graphically represented in Figure

Table 22
Indices of Dissimilarity for Denials & Approvals by Race/Ethnicity in West Jordan, 2006–2011

	Denials		Approvals	
	<i>Boom</i>	<i>Bust</i>	<i>Boom</i>	<i>Bust</i>
Non-Hispanic White	0.05	0.09	0.01	0.02
Hispanic/Latino	0.06	0.12	0.05	0.04

Source: HMDA LAR Raw Data by MSA (2006-2011)

46. This shift in the denial income distribution is apparent for both groups, not just Hispanic/Latino applicants. Thus, neither the indices nor the graphical representations of the income distributions suggest that the low approval rates among Hispanic/Latino applicants are due to the income disparities across racial and ethnic groups.

FAIR HOUSING INFRASTRUCTURE

The city of West Jordan has a webpage on the city's website regarding fair housing and complaint contact information. The website, currently only written in English, will soon be translated into Spanish. The contents of the website include prohibitions under fair housing regulations, information on protected classes, the types of housing covered, additional protections for disabled individuals, new building requirements, housing opportunities for families, and references to HUD for further fair housing information. On this webpage, there is also a link to more specific complaint information that describes the laws regarding housing and discrimination, giving a phone number for the Utah Antidiscrimination and Labor Division (UALD), with TDD and Spanish options. It also defines predatory lending practices, protected classes, family status, and source of income. There is also a link to another page with more specific information on senior housing in the city. Similarly, West Jordan participates in the Good Landlord program to help promote fair housing practices in the city.

Though there is not a formal complaint process in the city of West Jordan, they city will welcome complaints from residents, mostly via the phone, but also through email. When this happen the complainant will be put into contact with the head of the Community Development Block Grant program who will then review the complaint to verify its merit as a fair housing complaint before passing it along to HUD or the UALD. This is done by speaking to the parties involved first, and the current CDBG coordinator has not had a single fair housing complaint in 13 years. Most complaints are instead landlord disputes, not resulting from discrimination. To advertise fair housing in the city, West Jordan publishes an annual notice in the local newspaper promoting the law and initiatives of the city. However, this publication is currently just provided in English. Similarly, they have also instituted a fair housing awareness month in the city. If a complaint ever does come to the city, there are Spanish translators on staff. The city is also willing to seek out translator services as the need arises. Within the year, one such service, South Valley Sanctuary, is relocating to West Jordan's city hall, opening direct access to translator services in the same building.

APPENDIX

Explanation of Opportunity Indices

Index of Dissimilarity for Mortgage Denials and Approvals

The degree of difference between two distribution curves can be calculated using the index of dissimilarity. The formula² for the index of dissimilarity Δ shown below is tailored specifically to describe the difference between the income distribution of mortgage applications and that of denied mortgage applications:

$$\Delta = \frac{1}{2} \sum_{i=1}^k \left| \frac{a_i}{A} - \frac{r_i}{R} \right|$$

where

a_i = the number of mortgage applications with reported incomes in the i^{th} income decile

A = the total number of mortgage applications

r_i = the number of denied applications with reported incomes in the i^{th} income decile

R = the total number of denied applications

The index of dissimilarity is interpreted as the percentage of one group that must move to other income deciles in order to create a distribution equal to that of the other group. For instance, in comparing the application volume and denial distributions across the countywide deciles, an index of dissimilarity of 0.03 means that 3 percent of the denied applicants would have to move to another income decile in order to match the overall application distribution. This index in itself cannot specify if approvals and denials are occurring disproportionately at certain income levels. Cumulative distribution curves of total applications and approved/denied applications can provide this information graphically.

² Shryock, Henry S., Jacob S. Siegel and Associates. *The Methods and Materials of Demography*, ed. Edward G. Stockwell. Condensed Edition. San Diego: Academic Press, 1976.