

West Valley City: Fair Housing Equity Assessment

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[DRAFT]

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SUMMARY OF FAIR HOUSING EQUITY ASSESSMENT

Background

- West Valley City is on the verge of having a minority-majority population given its tremendous increase in the minority share of the city population from 13 percent in 1990 to over 46 percent in 2010.
- While Hispanics represented 66 percent of the net minority population growth from 1990 to 2000, they accounted for over 82 percent of the minority growth in the following decade.

Segregation

- Over a third of the minority rental units are located in the Decker Lane and City Centre neighborhoods (east of I-215). This area has most of the city's low-wage employment opportunities.
- Homeownership rates for non-Hispanic whites increased from 69 percent in 1990 to 77 percent in 2010. Minority homeownership rates have been below 60 percent during this period.
- In 2010, minorities accounted for over half of the city's rental households while only constituting 35 percent of the city's total households.

RCAP/ECAP

- The overall poverty rate in West Valley City in 2010 was about 11 percent, while a minority resident was more than twice as likely to be poor as a non-Hispanic white resident and comprised about almost two thirds of the total poor population.
- The city has no racially or ethnically concentrated areas of poverty; however, much of the city has concentrations of minorities or Hispanics more than 10 percentage points above the county average. Some tracts in the northeast even constitute minority-majorities.

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 Valley City received a low score of only 2 out of 10, which is 2.9 points below the county average.
- The opportunity scores at individual schools in West Valley City also scored relatively low compared to the rest of the county. For the most part, the lowest-ranked schools are located in the northeast in the areas highly concentrated with poor and minority residents.
- The assessed single-family home values in the city are very low, with the median home value less than \$160,000. Many low-income and protected class households live in the poorer areas of the city, despite the low access to opportunity.
- Nearly 40 percent of approved loans for Hispanic applicants from 2006 to 2011 were high interest—2.5 times higher than among non-Hispanic white approved applicants.

FAIR HOUSING EQUITY ASSESSMENT ANALYSIS

In the recent decades, the population has been steadily increasing in West Valley City, and the increase is largest among minority populations. In 2010, the minority population of the city was about 46 percent the highest minority population in the county. As the number of minority residents continues to increase, the entire city is on the verge of having a minority-majority population. In fact, several tracts in the city already have minority-majority populations. However, as the city grows, a disproportionate amount of the minority population, especially Hispanics, are of lower income and living in rental units. In fact, while minorities accounted for over half of the city's rental households, they constitute only 35 percent of the city's total households. This means, even in a city with a high minority resident population, non-Hispanic whites are still, on average, disproportionately more affluent than minorities.

In addition to the shifting racial and ethnic demographics in West Valley City, the changing household demographics have implications for housing impediments. While the non-Hispanic white average household size steadily declined from 3.30 in 1990 to 2.99 in 2010, the Hispanic average household size increased from 3.35 to 4.49 during this period. Pacific Islander average household sizes have been even larger, increasing from 5.21 in 1990 to 5.45 in 2010. The large household sizes among Hispanics and Pacific Islanders could pose housing impediments in finding suitable rental units with an adequate number of bedrooms without bearing large rent burden.

Furthermore, the cost of transportation added upon rent burden could lead to neighborhood self-selection effects. Whereas only 14 percent of minority owner-occupied units are in the Decker Lane and City Centre neighborhoods (east of I-215), over a third of minority renter units are in this location. This neighborhood selection effect could be due to the large number of low-wage employment opportunities in this area. The neighborhood selection effect has become increasingly apparent in the mortgage market, as the share of Hispanic applicants who selected Decker Lane and City Centre neighborhoods have increased from under 25 percent in 2007 to nearly 40 percent in 2011. On the other hand, the share of non-Hispanic white applicants who selected these neighborhoods declined from 30 percent in 2007 to less than 20 percent in 2011. The widening gap suggests that non-Hispanic whites who choose to live in West Valley City are increasing selecting the Hunter/Granger residential neighborhoods located west of I-215, while Hispanics/Latinos choose residential areas near the city center and commercial areas east of I-215.

Overall, the city ranks low in terms of access to opportunity, with a majority of tracts scoring a 1 or 2 out of 10 in terms of access to opportunity. The only index that scored near the county average in the West Valley City is job access. Therefore, though the public transit options are not the most plentiful in the city, there are enough transportation options and commercial centers with low-wage jobs within a reasonable access to the aggregate neighborhoods of West Valley City. However, due to the low home values and high rates of poverty, many of the other indices rank much lower. Therefore, simple access to jobs, schools and amenities is not the simple solution in terms of fair housing and equity in the city. Instead, underlying opportunity factors need particular attention, including high poverty rates, low housing stability, low labor market engagement in the city and most importantly, low school proficiency. Further integration of the neighborhoods with a wider range of socioeconomic levels can help to combat these issues. The availability of affordable housing throughout the city will avert the patterns of segregation seen in neighborhood selection effects and lending practices.

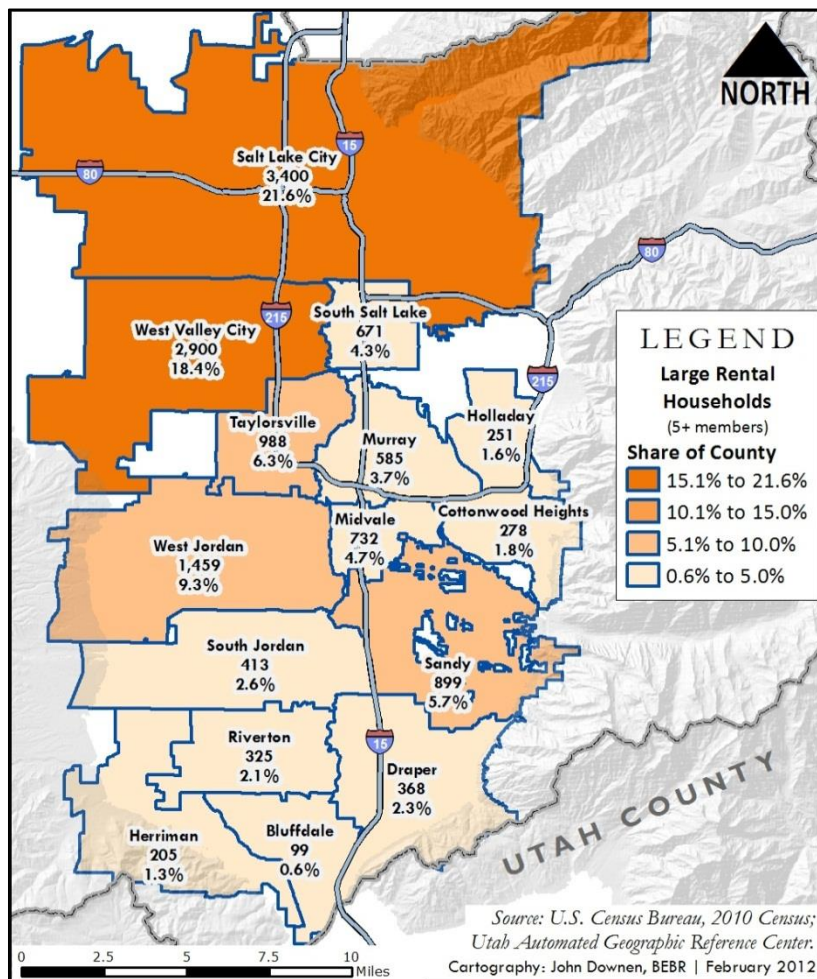
BACKGROUND

The dramatic minority increase in West Valley City from 1990 to 2010 has transformed the city into a very diverse community on the verge of having a citywide minority-majority population in the near future. Table 1 shows the demographic trends in West Valley City from 1990 to 2010 for selected protected classes. While the non-Hispanic white share of the West Valley City population was 87 percent in 1990—higher than Salt Lake City’s 82.6 percent non-Hispanic white share—West Valley’s non-Hispanic white share decreased to 54 percent in 2010. The Hispanic/Latino population was the largest driving force behind the minority increase, comprising only a 7 percent share in 1990 before becoming over a third of the city’s population in 2010.

While the share of households with children under 18 decreased from 57 percent in 1990 to 51 percent in 2010, the share of households with persons 65 and over increased from 11 percent in 1990 to nearly 18 percent in 2010. Single-parent households with children have remained around 12 percent from 1990 to 2010.

Figure 1 shows each city’s share of Salt Lake County’s large rental households, which are defined as having five or more persons. Over a fifth of the county’s large rental households reside in Salt Lake City. The six entitlement cities—Salt Lake City, West Valley City, Taylorsville, West Jordan, Sandy, and South Jordan—constitute nearly 64 percent of the county’s large rental households. Over 18 percent of large rental households reside in West Valley City. 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 in West Valley City, 1990–2010**

	1990		2000		2010	
	Count	Share	Count	Share	Count	Share
Total Population	86,976		108,896		129,480	
White (not Hispanic)	75,748	87.1%	76,545	70.3%	69,498	53.7%
Black (not Hispanic)	687	0.8%	1,090	1.0%	2,254	1.7%
Asian ¹	2,099	2.4%	4,614	4.2%	6,303	4.9%
Hispanic/Latino	6,212	7.1%	20,126	18.5%	42,892	33.1%
Minority (all except non-Hispanic white)	11,228	12.9%	32,351	29.7%	59,982	46.3%
Persons with disabilities ²	—	—	18,206 ± 626	18.9% ± 0.6%	10,093 ± 1,015	8.7% ± 0.9%
Total Households	25,933		32,253		37,139	
Households with Children under 18 years	14,784	57.0%	16,895	52.4%	18,864	50.8%
Households with Persons 65 years or over	2,722	10.5%	4,348	13.5%	6,619	17.8%
Single Parent with Children under 18 years	3,283	12.7%	3,664	11.4%	4,466	12.0%
Large Families (5 or more persons)	6,148	23.7%	7,636	23.7%	9,891	26.6%
Owner-occupied Housing Units	17,456	67.3%	23,418	72.6%	25,975	69.9%
Renter-occupied Housing Units	8,477	32.7%	8,835	27.4%	11,164	30.1%

¹The 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.

²The 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	21,920	20,584
White (not Hispanic)	797	-7,047
Black (not Hispanic)	403	1,164
Asian (not Hispanic)	2,515	1,689
Hispanic/Latino	13,914	22,766
Minority	21,123	27,631
Total Households	6,320	4,886
Households with Children <18	2,111	1,969
Households with Persons 65+	1,626	2,271
Single Parent with Children < 18	381	802
Large Families (5+ persons)	1,488	2,255
Owner-occupied Housing Units	5,962	2,557
Renter-occupied Housing Units	358	2,329

Source: U.S. Census Bureau

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

	1990– 2000	2000– 2010
Total Population	25.2%	18.9%
White (not Hispanic)	1.1%	-9.2%
Black (not Hispanic)	58.7%	106.8%
Asian (not Hispanic)	119.8%	36.6%
Hispanic/Latino	224.0%	113.1%
Minority	188.1%	85.4%
Total Households	24.4%	15.1%
Households with Children <18	14.3%	11.7%
Households with Persons 65+	59.7%	52.2%
Single Parent with Children < 18	11.6%	21.9%
Large Families (5+ persons)	24.2%	29.5%
Owner-occupied Housing Units	34.2%	10.9%
Renter-occupied Housing Units	4.2%	26.4%

Source: U.S. Census Bureau

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lists the average household sizes in West Valley City by race and ethnicity. While the citywide average household size steadily increased from 3.34 in 1990 to 3.48 in 2010, the non-Hispanic average household size declined from 3.3 to 2.99 during this 20-year period. Interestingly, the Hispanic/Latino average household size of 3.35 in 1990 was fairly comparable to that of non-Hispanic whites but quickly increased by 34% to 4.49 by 2010—nearly 1.5 times larger than the non-Hispanic white average household size in 2010.

Pacific Islanders have the highest average household size, increasing from 5.21 in 1990 to 5.45 in 2010. In fact, the Pacific Islander average household size in 2010 was 1.8 times larger than the non-Hispanic white average household size.

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 Valley City, 1990–2010**

Race/Ethnicity	1990 ¹	2000	2010
White (not Hispanic)	3.30	3.10	2.99
Hispanic/Latino	3.35	4.28	4.49
American Indian (not Hispanic)	3.86	3.65	3.80
Asian/Pacific Islander (not Hispanic)	4.47	4.66	4.41
Asian ²	4.03	4.17	3.85
Pacific Islander ²	5.21	5.57	5.45
Black (not Hispanic)	2.98	3.11	3.55
Other Race (not Hispanic)	3.13 ⁵	— ⁴	3.88
Two or More Races (not Hispanic) ³	—	3.61	3.52
Total Population	3.34	3.36	3.48

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.

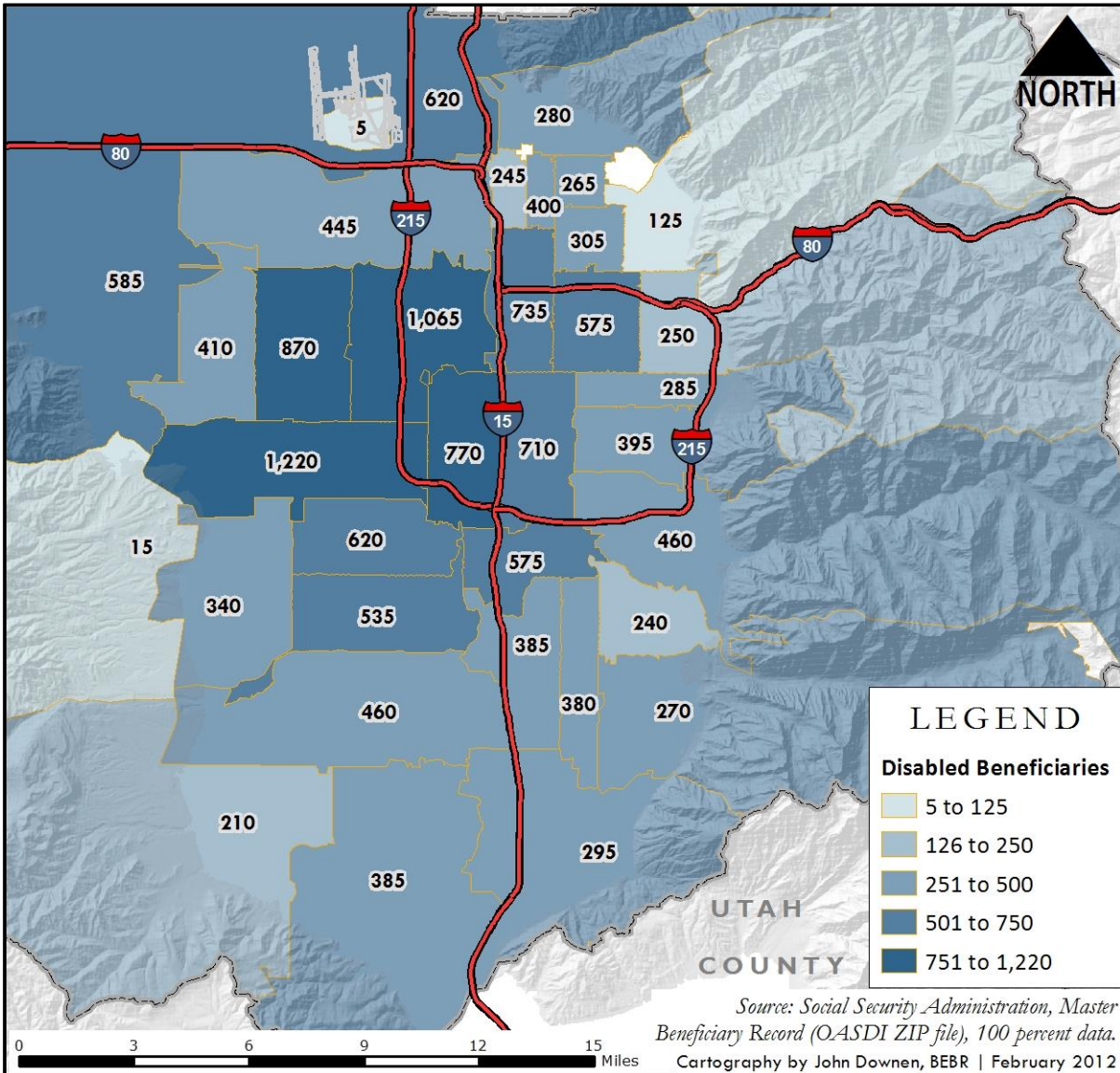
³ The 1990 Census did not include “Two or More Races” as an option for race.

⁴ The 2000 Census Summary File 2 did not tabulate average household size for “Other Race” due to the low number 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 **Error! Reference source not found.** 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. In fact, the highest absolute number of social security beneficiaries is in West Valley City zip codes.

SEGREGATION

Homeownership rates in West Valley City increased from 67 percent in 1990 to 73 percent in 2000 before falling to 70 percent in 2010 (Table 5). Non-Hispanic white homeownership rates increased from 69 percent in 1990 to 77 percent in 2010. On the other hand, minority homeownership rates increased from 54 percent in 1990 to 60 percent in 2000 before dropping to 57 percent in 2010. The homeownership rate for blacks in 2010 even decreased below the 1990 rate of 45 percent. Asians were the only minority group with homeownership rates comparable to that of non-Hispanic whites.

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

Race and Ethnicity	1990	2000	2010
White (not Hispanic)	69.0%	76.3%	76.9%
Minority	53.5%	59.8%	57.3%
Hispanic/Latino	54.6%	58.3%	56.2%
Non-Hispanic Minority	52.0%	62.2%	59.8%
American Indian	33.9%	42.3%	44.2%
Asian or Pacific Islander	60.1%	70.1%	65.8%
Asian	—	75.4%	74.8%
Pacific Islander	—	60.2%	49.3%
Black	44.9%	52.1%	43.3%
Other Race	46.7%	45.5%	68.8%
Two or More Races	—	53.3%	59.1%
Total	67.3%	72.6%	69.9%

Source: U.S. Census Bureau

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

Race and Ethnicity	1990	2000	2010
White (not Hispanic)	31.0%	23.7%	23.1%
Minority	46.5%	40.2%	42.7%
Hispanic/Latino	45.4%	41.7%	43.8%
Non-Hispanic Minority	48.0%	37.8%	40.2%
American Indian	66.1%	57.7%	55.8%
Asian or Pacific Islander	39.9%	29.9%	34.2%
Asian	—	24.6%	25.2%
Pacific Islander	—	39.8%	50.7%
Black	55.1%	47.9%	56.7%
Other Race	53.3%	54.5%	31.3%
Two or More Races	—	46.7%	40.9%
Total	32.7%	27.4%	30.1%

Source: U.S. Census Bureau

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 Valley City has become increasingly lower than the share of total households. In 1990, 84.1 percent of total rental households in West Valley City were headed by non-Hispanic whites, fairly commensurate with the 88.8 percent non-Hispanic share of total households. However, in 2010, while the non-Hispanic white share of total households decreased to 65 percent, the non-Hispanic white share of rental households plummeted to below 50 percent. This means that the rental composition by race and ethnicity has diverged from the overall household demographics in West Valley City. Minorities now represent slightly over 50 percent of all rental households yet only comprise 35 percent of the total households in the city.

Table 7
Total Households by Race and Ethnicity
West Valley City, 1990–2010

Race and Ethnicity	1990		2000		2010	
	Number of Households	% Share	Number of Households	% Share	Number of Households	% Share
White (not Hispanic)	23,036	88.8%	24,988	77.5%	23,993	64.6%
Minority	2,897	11.2%	7,265	22.5%	13,146	35.4%
Hispanic/Latino	1,686	6.5%	4,482	13.9%	9,260	24.9%
Non-Hispanic Minority	1,211	4.7%	2,783	8.6%	3,886	10.5%
American Indian	230	0.9%	274	0.8%	292	0.8%
Asian or Pacific Islander	730	2.8%	1,694	5.3%	2,506	6.7%
Asian	—	—	1,101	3.4%	1,625	4.4%
Pacific Islander	—	—	593	1.8%	881	2.4%
Black	236	0.9%	363	1.1%	656	1.8%
Other Race	15	0.1%	22	0.1%	48	0.1%
Two or More Races	—	—	430	1.3%	384	1.0%
Total	25,933	100.0%	32,253	100.0%	37,139	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.

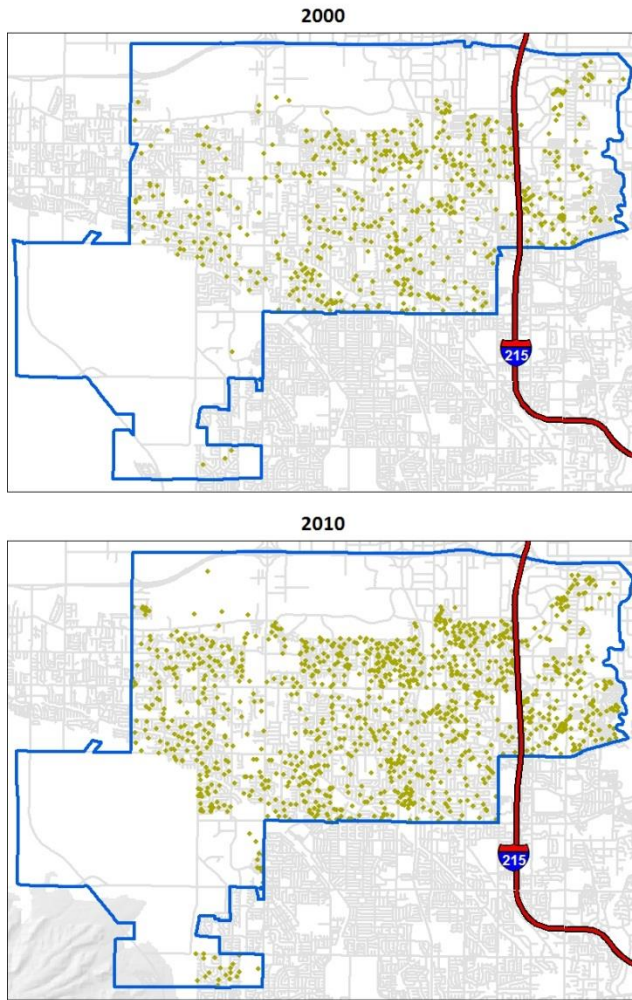
Table 8
Rental Households by Race and Ethnicity
West Valley City, 1990–2010

Race and Ethnicity	1990		2000		2010	
	Number of Households	% Share	Number of Households	% Share	Number of Households	% Share
White (not Hispanic)	7,130	84.1%	5,916	67.0%	5,547	49.7%
Minority	1,347	15.9%	2,919	33.0%	5,617	50.3%
Hispanic/Latino	766	9.0%	1,867	21.1%	4,054	36.3%
Non-Hispanic Minority	581	6.9%	1,052	11.9%	1,563	14.0%
American Indian	152	1.8%	158	1.8%	163	1.5%
Asian or Pacific Islander	291	3.4%	507	5.7%	856	7.7%
Asian	—	—	271	3.1%	409	3.7%
Pacific Islander	—	—	236	2.7%	447	4.0%
Black	130	1.5%	174	2.0%	372	3.3%
Other Race	8	0.1%	12	0.1%	15	0.1%
Two or More Races	—	—	201	2.3%	157	1.4%
Total	8,477	100.0%	8,835	100.0%	11,164	100.0%

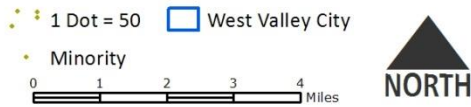
Source: U.S. Census Bureau

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
Minority Population Concentrations
in West Valley City, 1990–2010



LEGEND

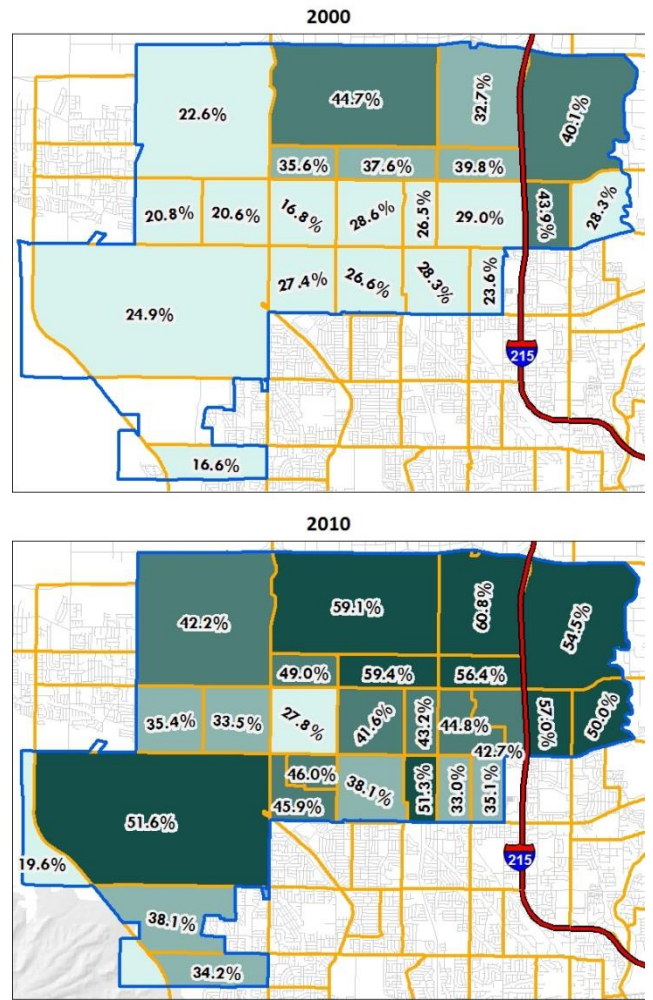


Note: City boundaries and some census block boundaries changed between 2000 and 2010.

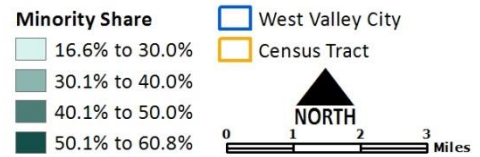
Cartography: John Downen, BEBR
 February 2012

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

Figure 4
Percent of Minority Population by Tract
in West Valley City, 1990–2010



LEGEND



Note: Some census tract boundaries changed between 2000 and 2010.

Cartography: John Downen, BEBR
 January 2012

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

Figure 3 shows West Valley City’s minority concentrations in 2000 and 2010. The northern and southwestern regions of West Valley City do not have any dots in Figure 3, because these are manufacturing centers rather than single-family residential neighborhoods. 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 none of the West Valley census tracts had minority shares above 50 percent in 2000, several census tracts have become minority-majorities in 2010.

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

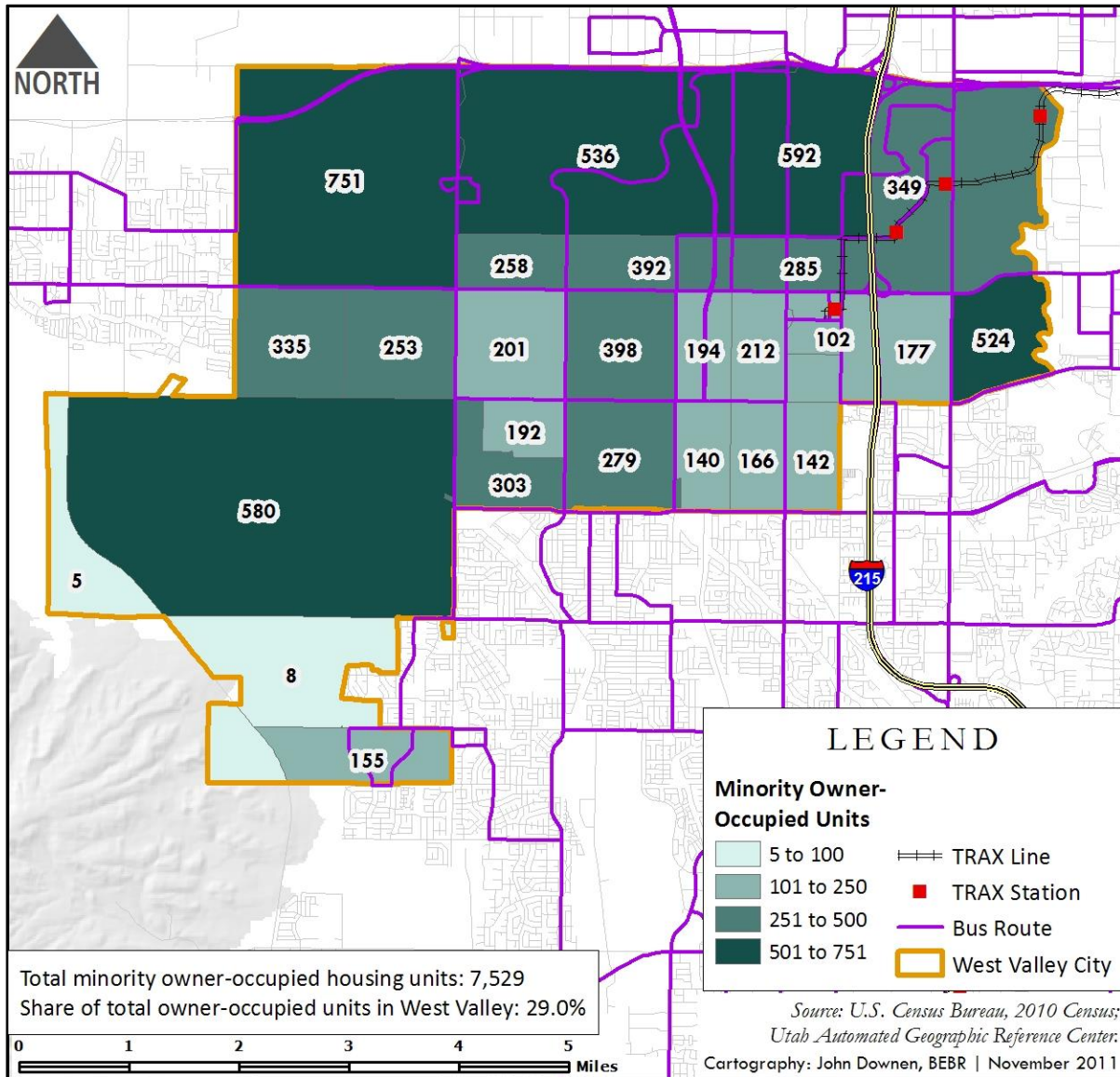
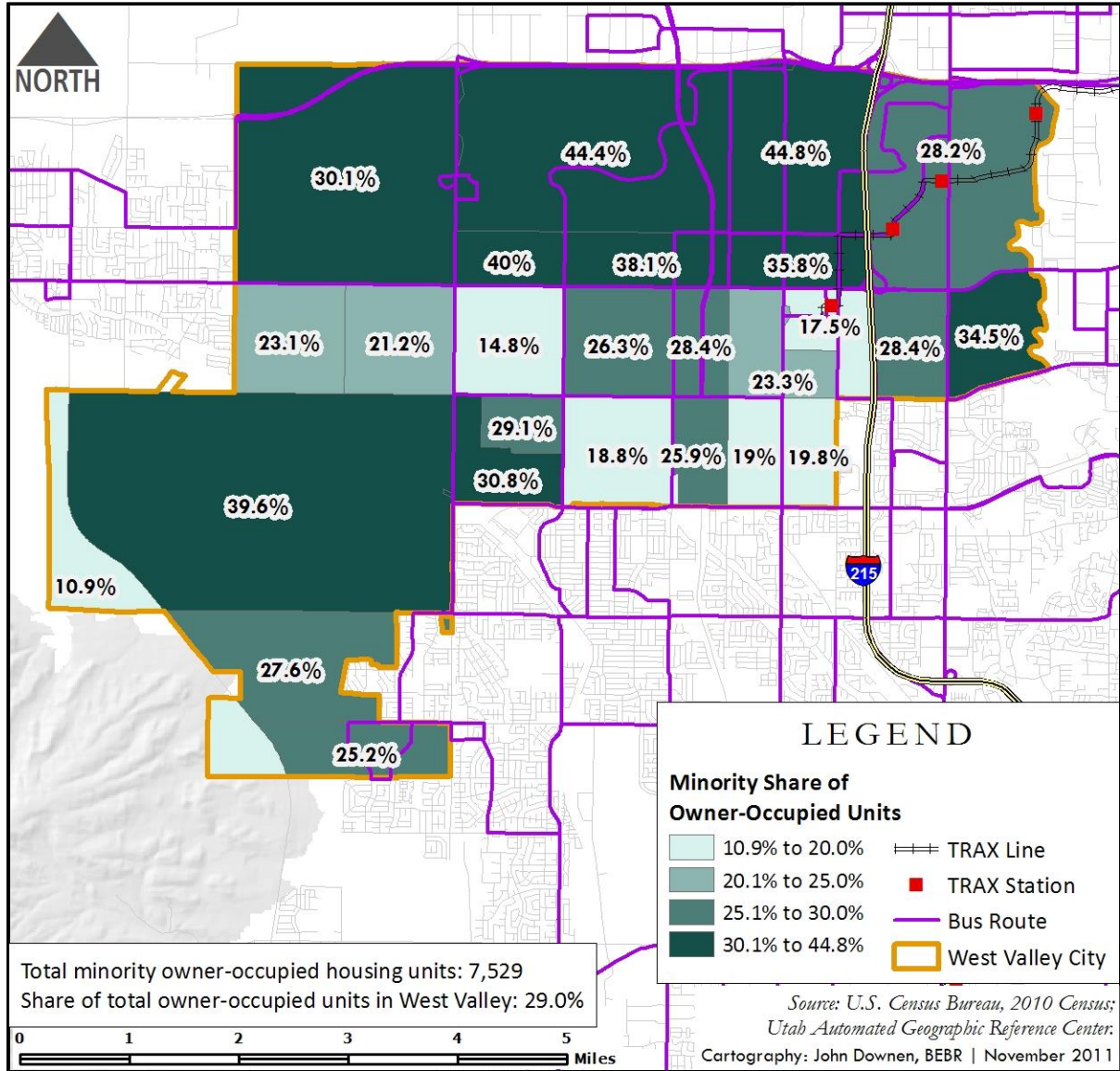


Figure 5 shows the number of minority owner-occupied units by census tracts in West Valley City. Figure 6 provides the percent of owner-occupied units that are minority households. Interestingly, the areas with the highest number of minority owner-occupied units are in the northern and south-western regions near manufacturing centers. Thus, the 2010 minority growth in West Valley City is concentrated in areas with lower minority homeownership rates.

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



As shown in Figure 6, the minority share of owner-occupied units for many census tracts in the southern regions of West Valley City are below 20 percent. These census tracts are mostly single-family residential areas. However, most of these census tracts have minority populations above 40 percent of the respective census tract populations (Figure 4).

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

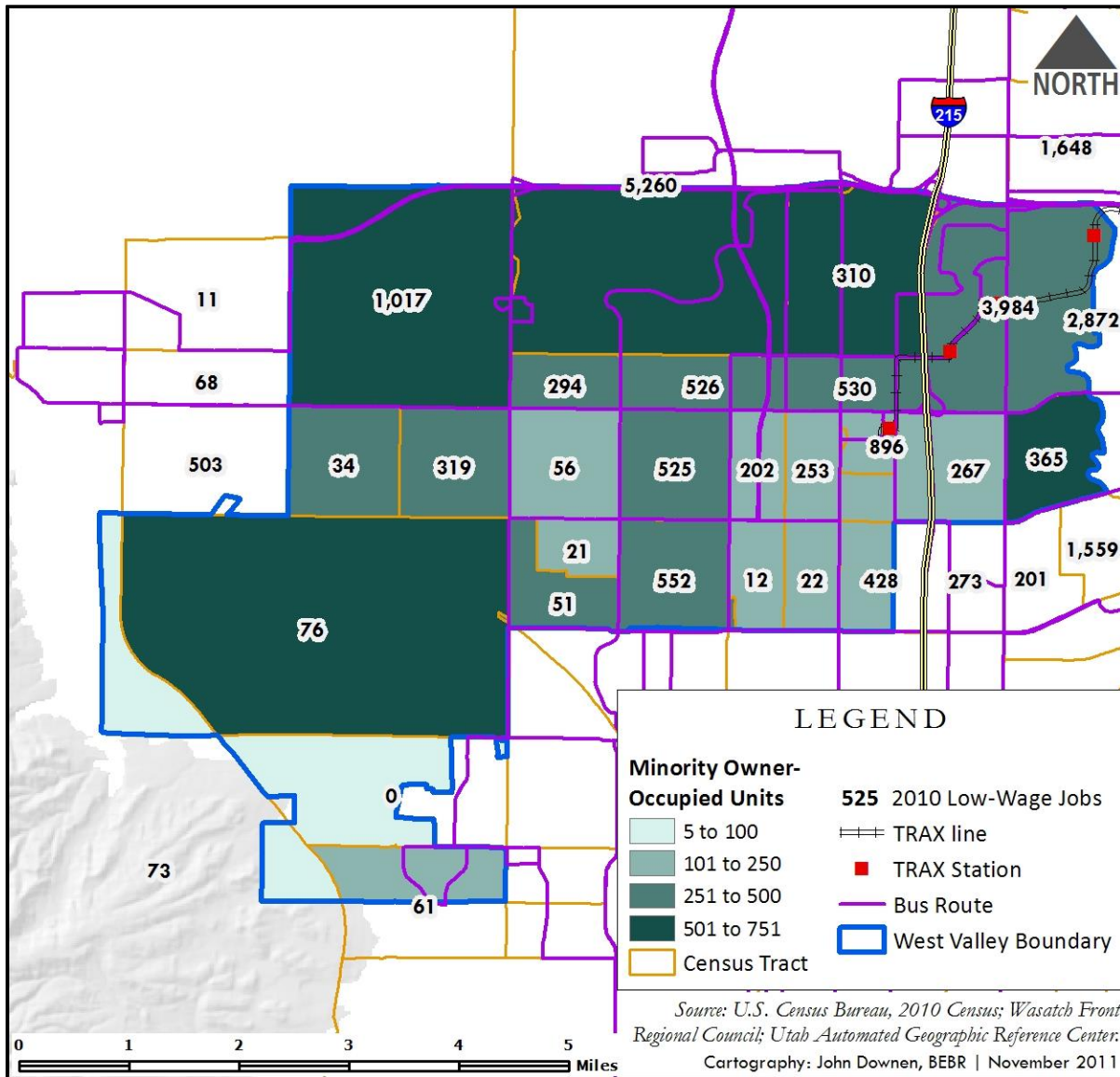


Figure 7 overlays the density of minority owner-occupied units (in shades of green) with the number of entry-level jobs. Most of the entry-level and low-wage jobs are located in the northern and northeastern regions of the city. The purple lines in Figure 7 represent the bus routes in the city. While the northern census tracts with high minority ownership also have many entry-level wage jobs, the sparse bus routes could make commuting difficult without a car. Most noticeably, the large southwestern census tract with high minority homeownership has no bus routes and few low-wage jobs in the proximity. The households in this southwestern census tract are concentrated mostly in the northeastern residential corner of the tract, since most of this area is a manufacturing center with few entry-level opportunities.

The TRAX line only has three stations serving entry-level employment centers in the northeastern corner, which are not close to the census tracts with high minority homeownership. The southeastern census tract includes a mix of mobile homes and single-family units near a commercial area, most likely the source of the entry-level wage jobs in the area.

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

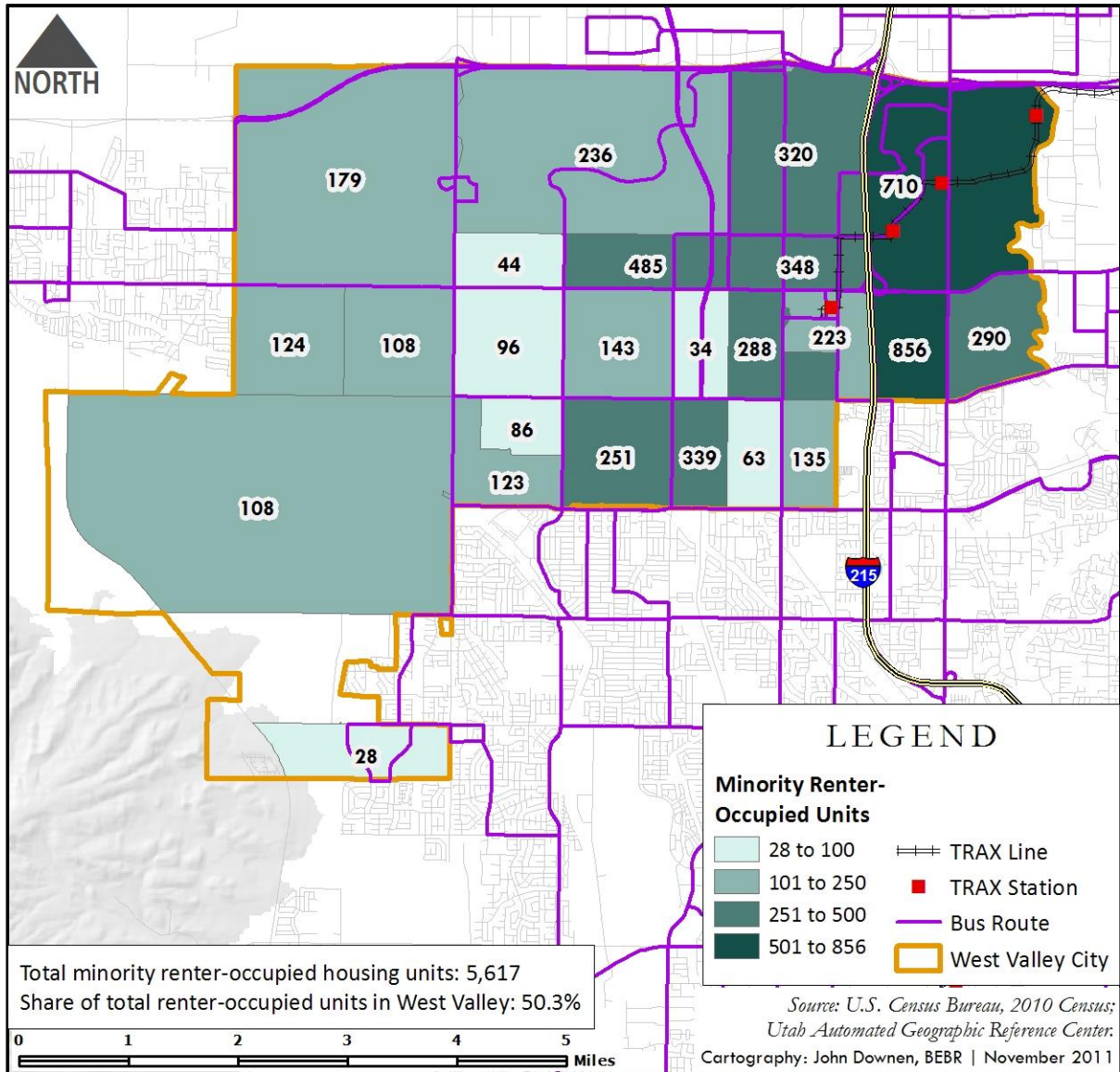


Figure 8 shows the number of minority renter-occupied units in West Valley City. While the minority owner-occupied units are concentrated in the northern and southwestern regions near manufacturing centers (Figure 5), minority renter-occupied units are mostly situated east of I-215.

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

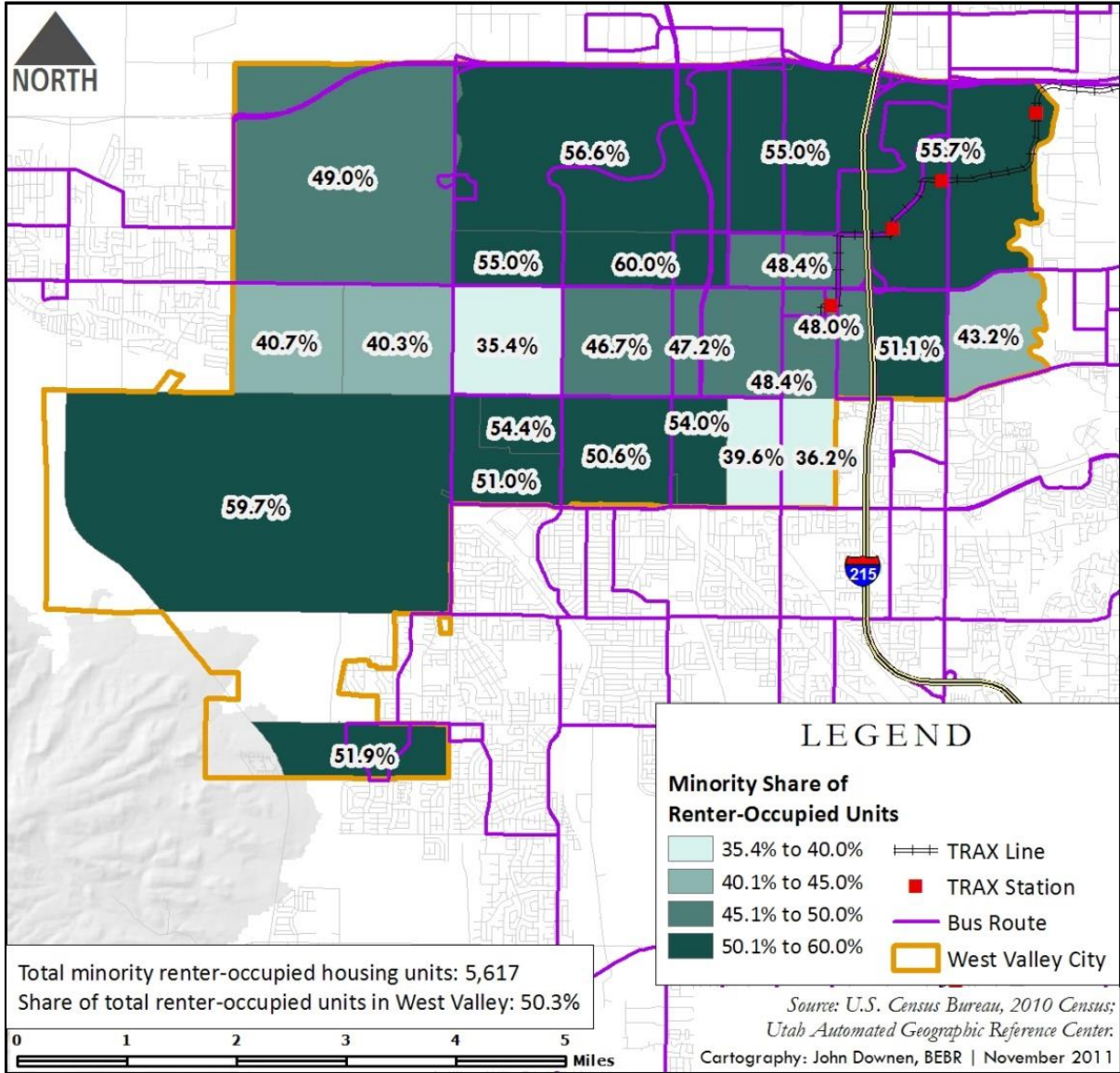


Figure 9 shows the minority share of renter-occupied units in West Valley City. The southern census tracts, which have disproportionately low minority share of owner-occupied units, have minority rental shares commensurate with the minority shares of the respective census tract populations. In fact, the minority rental shares are much more uniform throughout the entire city than the minority homeownership shares.

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

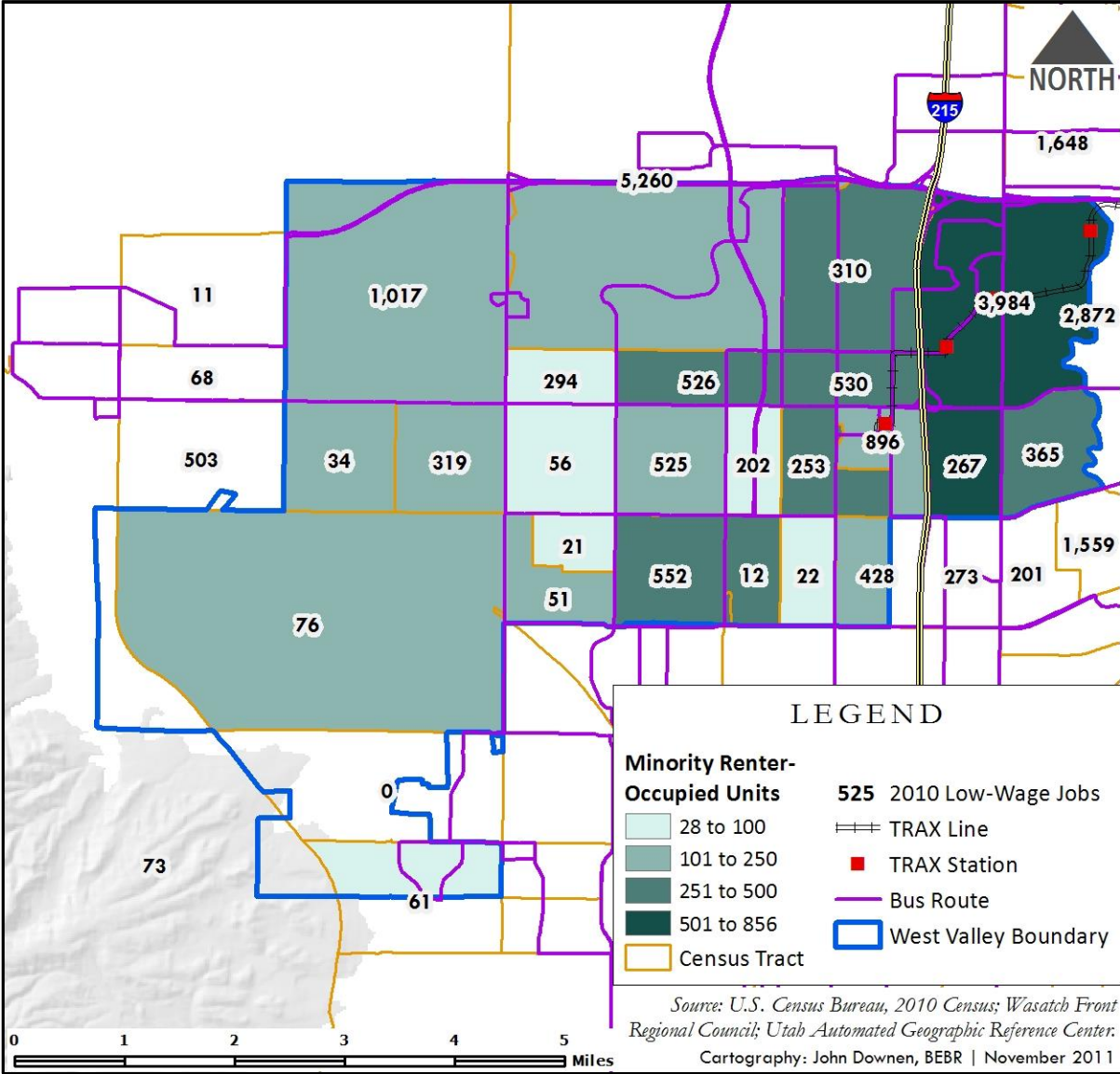


Figure 10 overlays the density of minority renter-occupied units with the number of entry-level jobs. The minority rental units are concentrated in the census tracts east of the I-215. The TRAX line cuts diagonally across the northeastern census tract, making it difficult to reach all neighborhoods in that area. In addition, given the few bus routes in this dense entry-level employment center, residents might have difficulty commuting without personal transportation unless they live within walking distance to their workplace.

**Table 9
Predicted Racial/Ethnic
Composition Ratio
West Valley City**

	Percent of Households		Actual/ Predicted Ratio
	Actual	Predicted	
Minority	32.8%	15.8%	2.08
Asian	5.2%	2.1%	2.40
Black	0.8%	1.2%	0.67
Hispanic/Latino	23.7%	10.6%	2.23

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 Valley City. 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.

Blacks are considered moderately below predicted share of the city population based on this metric. Nonetheless, the minority share of the city population is considered above predicted.

Table 10 compares the affordability of rental housing units in West Valley City 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 1 percent of West Valley's total housing units are deemed affordable below the 30 percent AMI level. The percent of fair share need

**Table 10
Fair Share Affordable Housing Index
West Valley City**

	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 × A)	% of Fair Share Need (C/D)
<30% AMI	37,656	410	1%	6%	2,303	18%
30%-50% AMI	37,656	2,684	7%	12%	4,352	62%
50%-80% AMI	37,656	7,029	19%	19%	7,109	99%

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.

below the 30 percent AMI level is 18 percent, meaning that the city's share of affordable rental units at this income level is only 18 percent of the metro area's share. According to HUD's scale for the fair share affordable housing index, this means that West Valley's housing stock is extremely unaffordable for those with incomes below the 30 percent AMI threshold. Similarly the fair share need

**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

based on affordability at the 30-50 percent AMI level is 62 percent, meaning that West Valley City's housing stock is considered moderately unaffordable for people in this income range. For incomes above 50 percent AMI, West Valley's housing units are considered affordable.

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

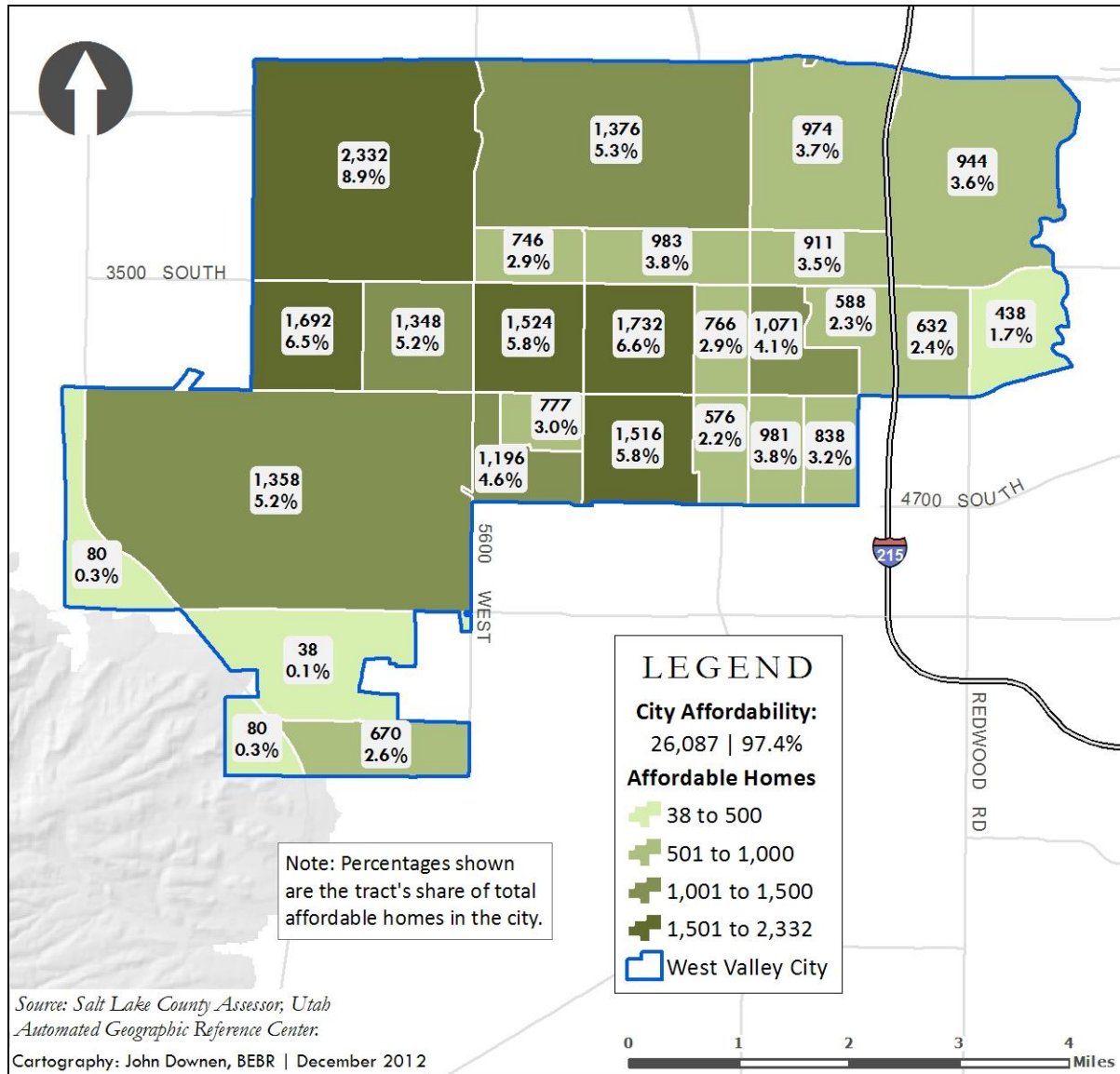


Figure 11 shows the number and share of single-family homes in West Valley City census tracts that are affordable at 80 percent AMI in 2011. The percentages shown in Figure 11 are each census tract's share of the total affordable homes in the city. Affordability calculations are based on 30 percent of annual income, accounting for taxes, home insurance, and mortgage insurance. The maximum affordable single-family home price at 80 percent AMI is \$255,897. Over 97 percent of the city's single-family homes are affordable at 80% AMI. Nearly 9 percent of the city's affordable single-family homes are in the northwestern census tract in West Valley City.

**Table 11
Dissimilarity Index**

Group	Dissimilarity Index		Dissimilarity Index Scale	
	West Valley	Salt Lake County	Value Ranges	Interpretation
Minority	0.29	0.43	≤ 0.40	Low Segregation
Hispanic/Latino	0.31	0.50	0.41-0.54	Moderate Segregation
Non-Hispanic Minority	0.36	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 Valley City are below the county levels. In order to the minority and non-Hispanic geographic distribution in West Valley City to match, 29 percent of minorities would have to move to other census blocks in the city. While the dissimilarity index itself does not provide any geospatial information about segregation, Figure 12 shows that the highest levels of dissimilarities are in census blocks right below the manufacturing centers in the northern region of the city and areas east of I-215.

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

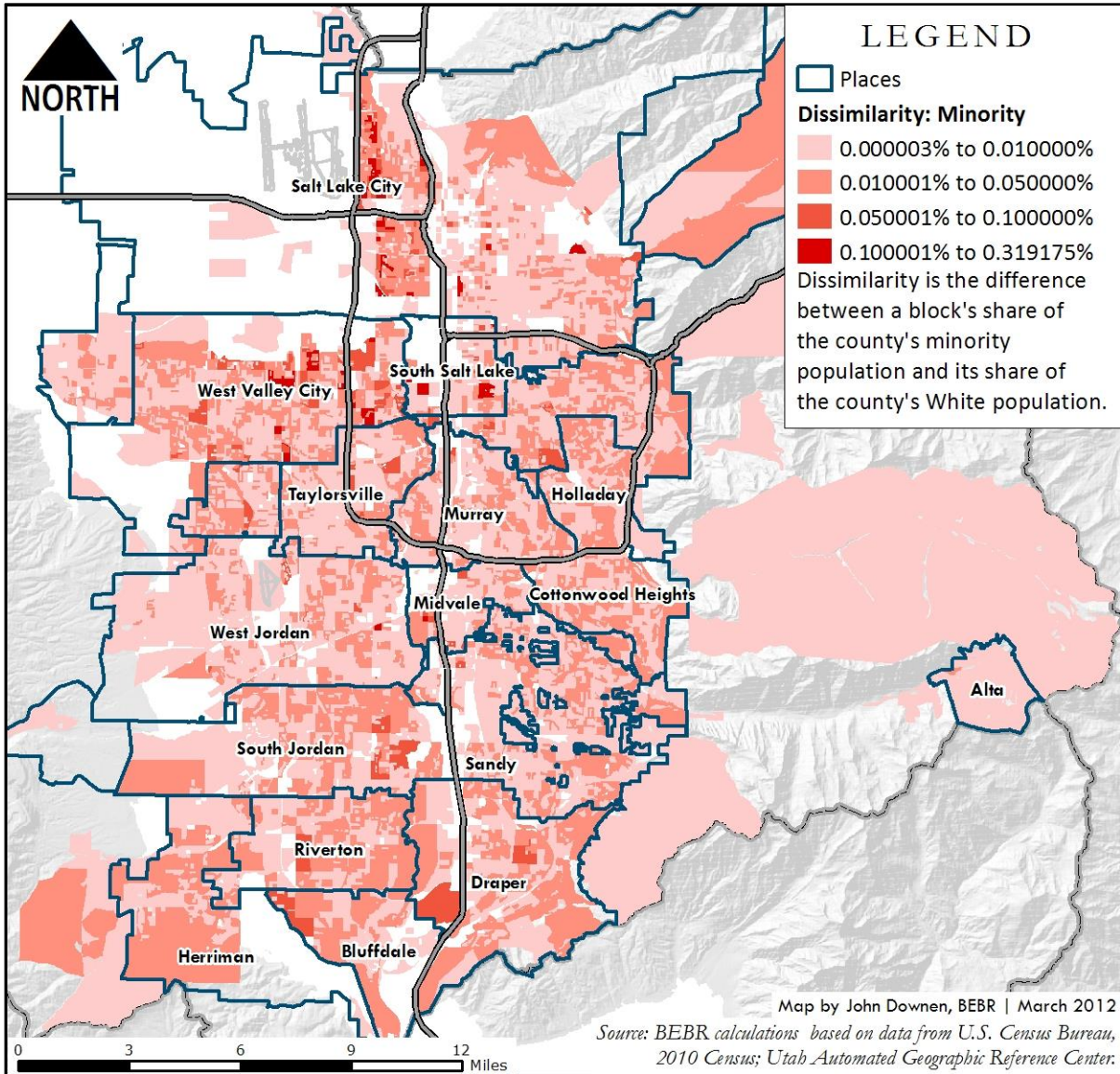


Figure 12 shows the absolute difference between each census block's county share of the minority and non-Hispanic white population. These absolute differences are used to calculate the dissimilarity index in Table 11. Noticeably large dissimilarities between the minority and non-Hispanic white county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

RCAP

In 2010, 10.7 percent of the people living in West Valley City were poor, which equated to approximately 12,787 residents (Table 12). A minority individual was about twice as likely to be poor as a non-Hispanic white individual. A black person was over four times as likely to be poor than a non-Hispanic white person. The highest prevalence of poverty was among blacks at almost 30 percent, followed by Pacific Islanders and Hispanics, each at approximately 17 percent. About sixty percent of the total poor are minorities, while Hispanics accounted for 47.9 percent of all poor people in the city (Table 13). Poor minorities in West Valley City outnumber whites by over 2,700 individuals. Together, poor blacks, Native Americans, Asians and Pacific Islanders only composed about 12 percent of the total poor in the city.

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

		Poor	Total	% Poor
West Valley City	Black	379	1300	29.2%
	Native Am.	89	1832	4.9%
	Asian	427	6655	6.4%
	Pacific Island	738	4381	16.8%
	Hispanic	6130	35614	17.2%
	Total Minority	7763	49782	15.6%
	White	5024	70000	7.2%
	Total	12787	119782	10.7%

Source: HUD Spreadsheets for Sustainable Communities Grantees

Table 13
Poor in West Valley City by Race and Ethnicity, 2010

	Race/ Ethnicity	Persons	Share
West Valley City	Black	379	3.0%
	Native Am.	89	0.7%
	Asian	427	3.3%
	Pacific Island	738	5.8%
	Hispanic	6130	47.9%
	Total Minority	7763	60.7%
	White	5024	39.3%
	Total Poor	12787	100.0%

Source: HUD Spreadsheets for Sustainable Communities Grantees

Figure 13 maps the concentrations of poor individuals living in West Valley City in 2010. Many poor residents live near Interstate 215 and near the end of the TRAX line along 3500 South in the eastern portion of West Valley City. There is also a large portion of poor individuals in the tract just north of 4700 South in the southern portion of the city, with a majority concentration of Pacific Islanders in these tracts. The southwestern corner of the city is sparsely populated with poor non-Hispanic white and Hispanic residents. This is most likely due to the lack of bus routes and adequate public transportation alternatives to get residents to employment centers and the low number of residences in the far west by the power plant. Nonetheless, fewer poor residents are choosing, or even able to live in this part of West Valley City. Despite these concentrations and high number of poor individuals, there are no racially or ethnically concentrated areas of poverty, according to the HUD definition (Figure 14). Even though there are no HUD-defined RCAPs in the city, it does not mean there are not relatively high numbers of minorities and poor residents living in the city. Rather, the city is highly populated with over 119,000 residents (Figure 13) of many races and ethnicities. As a result, the concentrations are easily diluted due to the sheer number of people living in the city.

Figure 13
Poor by Census Tract in West Valley City, 2010

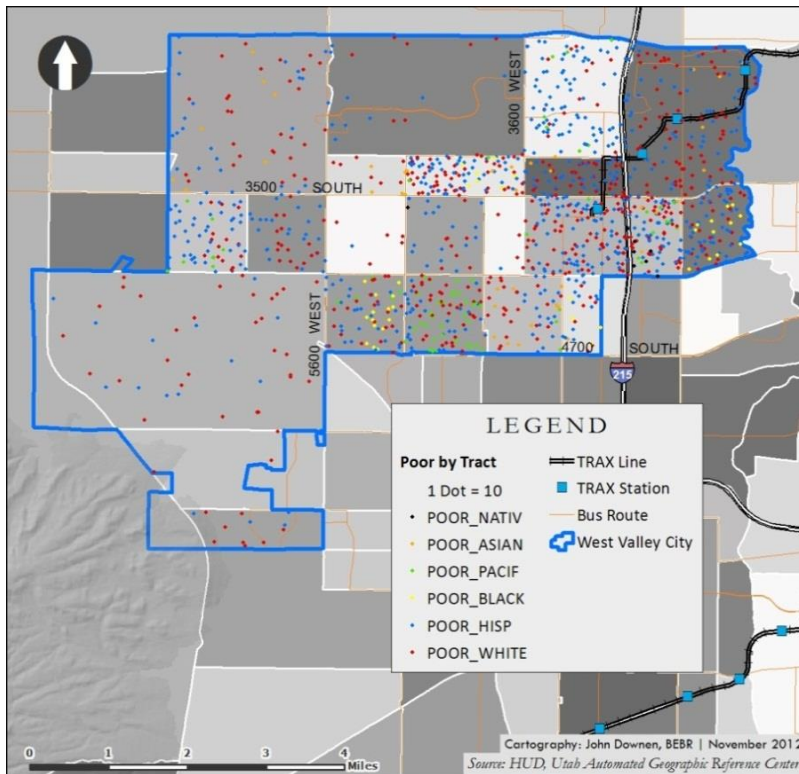
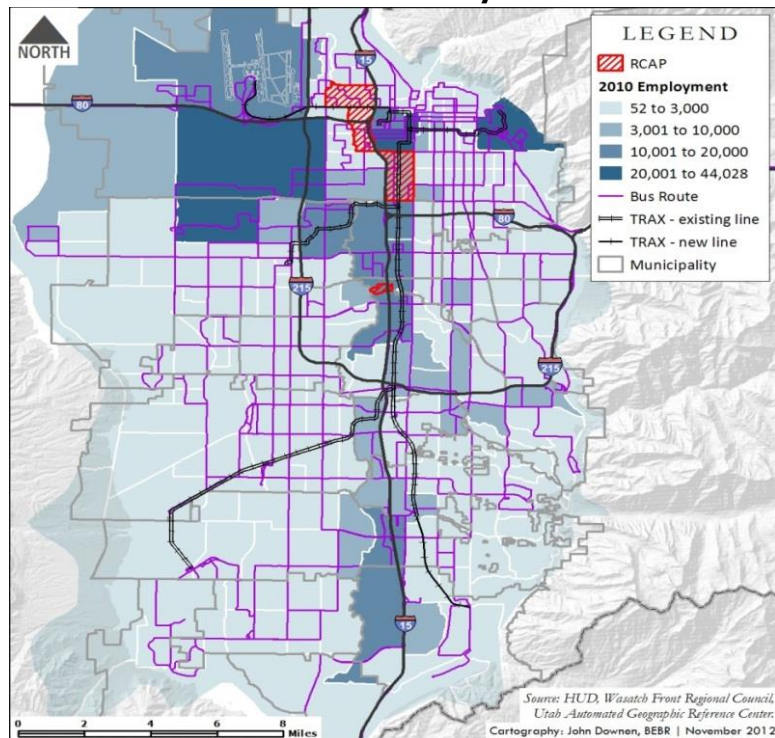


Figure 14
Racially/Ethnically Concentrated Areas of Poverty in Salt Lake County



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 a 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 Valley City. However, there are some census tracts with minority-majorities in the city, mostly in the northeast. Similarly, most of the city’s census tracts are more than 10 percentage points above the county average in terms of minorities and Hispanics living in the city. Overall, a majority of the city has a significantly high concentration of minority residents. Likewise, almost a sixth of the minority population in the city is poor (Table 12). Therefore, fair housing practices and access to opportunity are critical components in West Valley’s planning and redevelopment.

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

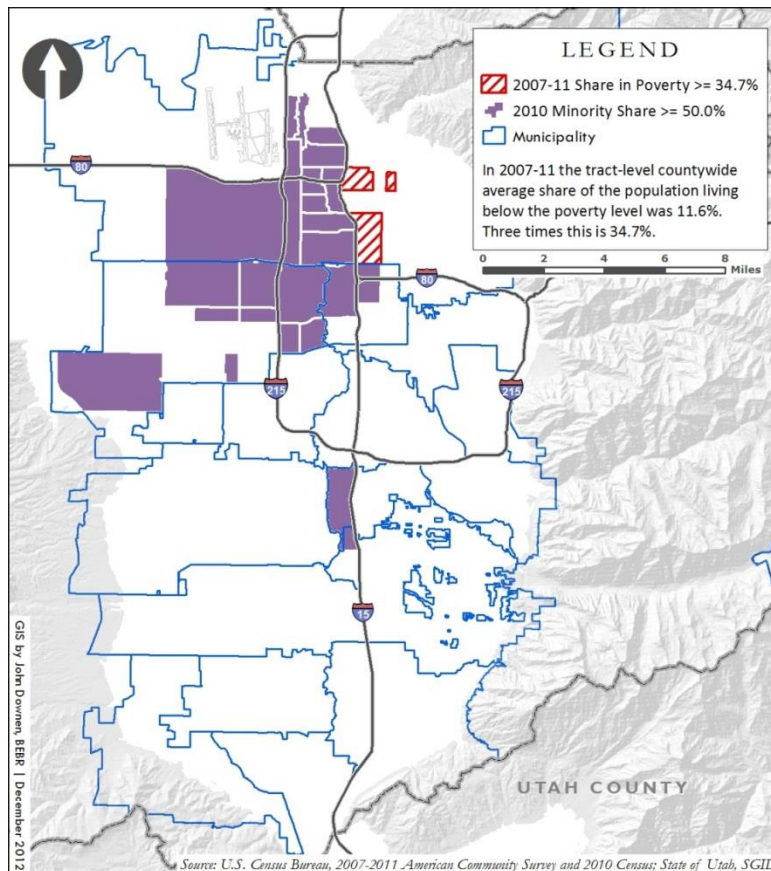


Figure 16
Concentrations of Poverty and
Hispanics by Tract in Salt Lake
County, 2007–2011

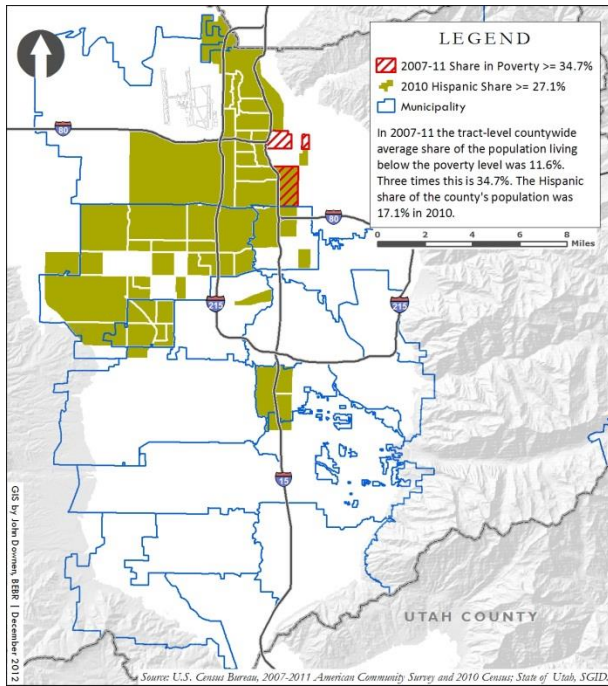


Figure 17
Concentrations of Poverty and
Minorities by Tract in Salt Lake
County, 2007–2011

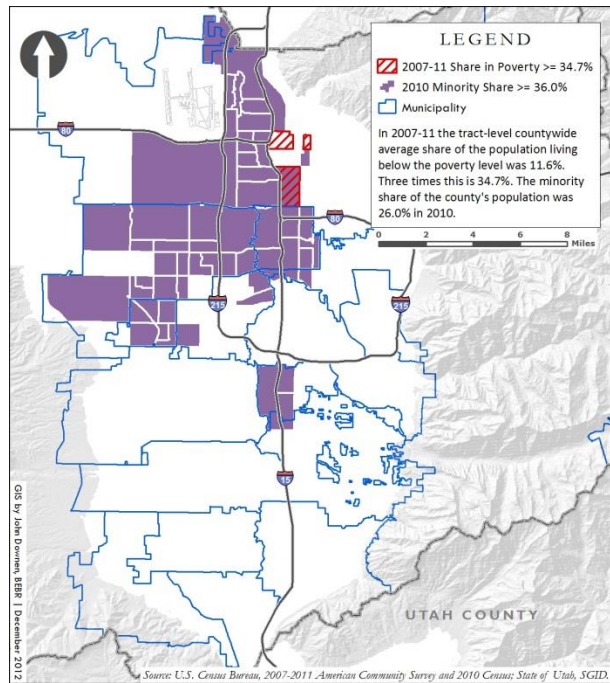
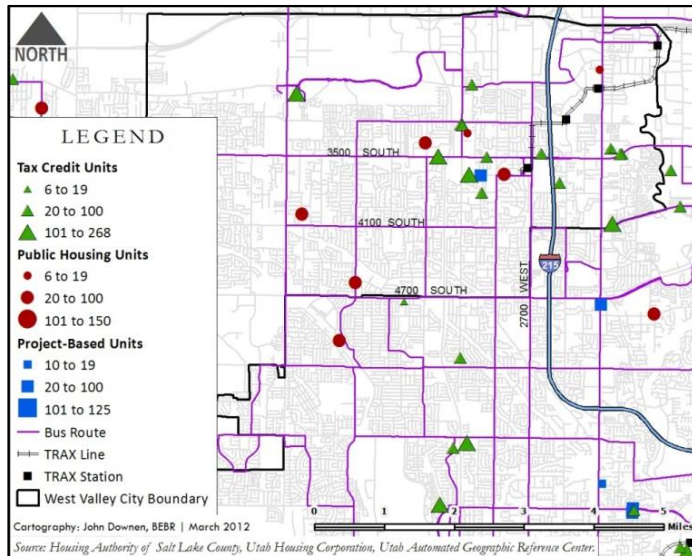
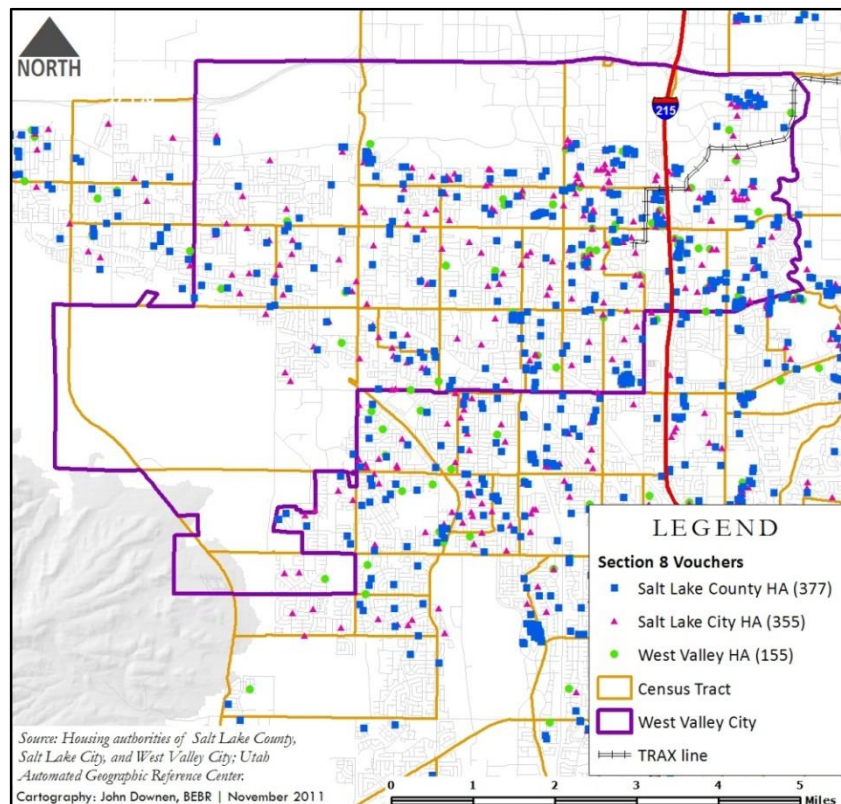


Figure 18
Subsidized Apartment Projects in West Valley City, 2011



The subsidized apartment projects in West Valley City are primarily located on the eastern side of the city (Figure 18). A majority are clumped around 3500 South, just west of I-215, close to the end of the TRAX line. This is not surprising as this is also an area highly concentrated with poor individuals, as displayed in Figure 13. There are a few other projects scattered around the central and south parts of the city, but none in the southwest. Once again, this could either be a result of a lack of demand for subsidized housing in this area, or instead lower-income households are unable to find adequate, affordable housing in this area. Either way, a majority of the subsidized housing projects are located in areas more densely populated with low-income households.

Figure 19
Section 8 Vouchers in West Valley City, 2011



Similarly, the location of Section 8 vouchers in the city mirror the geographic patterns of poor individuals (Figure 13), most located in the central and eastern portions of the city (Figure 19). An overwhelming majority are used on the eastern edges of the city around I-215, as well as a portion in the southern region near 4700 South. Almost none are used in the southwestern corner of the city, namely where there are almost no bus routes traveling into that tract. This indicates a need for low-income households with Section 8 vouchers to be more centrally located in the valley, and along major public transit lines. Without adequate public transportation in areas such as the southwest region of West Valley City closer to the power plant, low-income families are unable to support themselves in these areas, even if they have better schools and higher-ranked access to opportunity.

Table 14 displays the number of individuals receiving public assistance in West Valley City 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. Between 2007 and 2012, it is estimated that the zip codes covering West Valley City gained 13,374 more recipients, for a 50 percent increase. This increase is more than 3 percentage points above the county total and accounts for 20 percent of the total change in the county. Not a single zip code in the city experienced zero or negative growth, even in the smallest zip code 84170, with an increase of 2 more individuals.

Table 14
Distinct Individuals on Public Assistance, 2007–2012

City	Zip Code	2007 Individuals	2012 Individuals	Absolute Change	Percentage Change
West Valley City	84120	10,058	15,097	5,039	50.1%
West Valley City	84127	Less than 10†	12	≥3	≥25.0%
West Valley City	84128	4,201	6,811	2,610	62.1%
West Valley City	84170	24	26	2	8.3%
West Valley City*	84119	12,414	18,130	5,716	46.0%
West Valley City Totals		26,702	40,076	13,374†	50.1%†
Salt Lake County		146,699	215,426	68,727	46.8%

*A portion of ZCTA was removed post 2007 to become part of ZCTA 84129 in Taylorsville, and therefore the totals are affected.

†the 2007 number of individuals is estimated at 5 individuals, and this count is used to calculate West Valley City's totals.

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 as a share of the region's population 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 that any zip code marked with an asterisk was reshaped, or is a new zip code between 2007 and 2012. Not surprisingly, considering the high concentration of poor (Figure 13) and minority (Figure 17) residents in West Valley City, the number of public assistance recipients is also highest in the county. The largest increases in the city were in the eastern and southern tracts of the city. Overall, the city, along with the west side of Salt Lake City, has the highest overall number of individuals receiving public assistance in the county.

Figure 20
Individuals Receiving Public Assistance by Zip Code, 2012

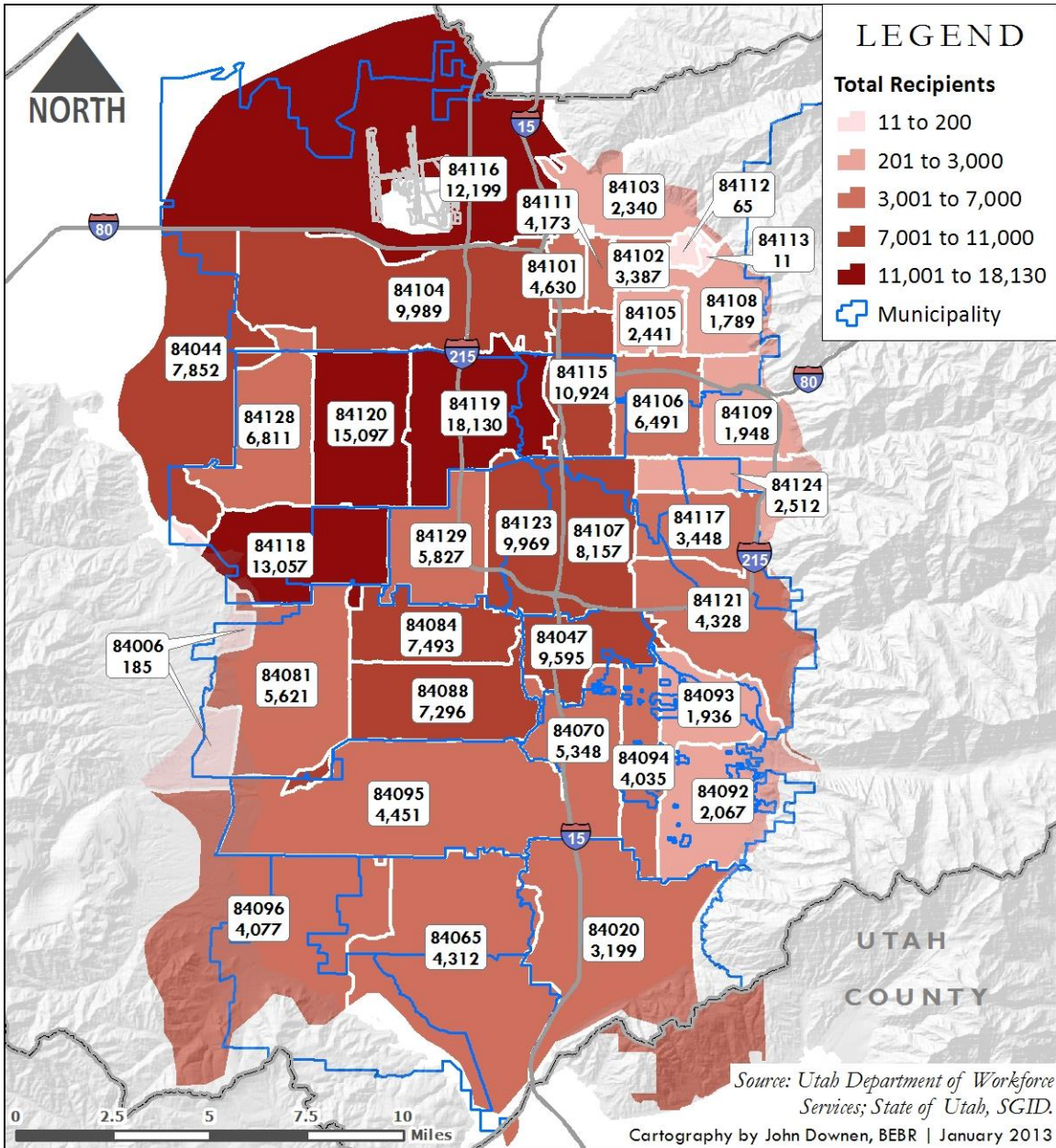


Table 15 uses the same DWS data on public assistance to calculate the number of large family households in 2007 and 2012 on public assistance. A large family size is classified as a household with five or more individuals living together. Countywide, the number of large families receiving public assistance increased by about 61 percent over the five year period. West Valley City saw an increase of approximately 3,959 large families on public assistance for a 65 percent increase. In 2012, the total number of large family recipients living in West Valley City zip codes comprised more than a fifth of the county total. Only the smallest zip code of 84127 saw a decrease in recipients, from a five families to zero. This does not necessarily mean however, that these families are no longer on public assistance. It is more likely that these five families are no longer calculated in this zip code when it was rezoned. This is contrary to zip code 84128, which saw the number of families receiving assistance almost double.

**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 Valley City	84120	2,532	3,908	1,376	54.3%
West Valley City	84127	—	5	—	—
West Valley City	84128	1,020	1,963	943	92.5%
West Valley City	84170	5	0	-5	-100.0%
West Valley City*	84119	2,506	4,146	1,640	65.4%
West Valley City Totals		6,063	10,022	3,959†	65.3%†
Salt Lake County		30,473	49,019	18,546	60.9%

*A portion of ZCTA was removed post 2007 to become part of ZCTA 84129 in Taylorsville, and therefore the totals are affected.

†The city total numbers are approximate because ZCTA had fewer than 10 recipients in 2007, so they were removed from the reporting and it is impossible to say what the exact change is. Instead the 2007 and 2012 totals are used to calculate change.

Source: BEBR Calculations from Utah DWS Data

Figure 21 displays the concentrations of these large families by zip code in Salt Lake County. Again, West Valley City zip codes have the highest number of large families receiving public assistance in the county, followed by west Salt Lake City. The higher numbers of families receiving assistance tend to live in the more eastern zip codes as well as 84118, which is shared with the township of Kearns. This could be a result of higher-density housing, a proximity to major public transit options and employment centers, or a lack of adequate affordable housing further west. Nonetheless, in West Valley City, the closer a zip code is to Interstate 215, the higher the number of large families on public assistance.

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

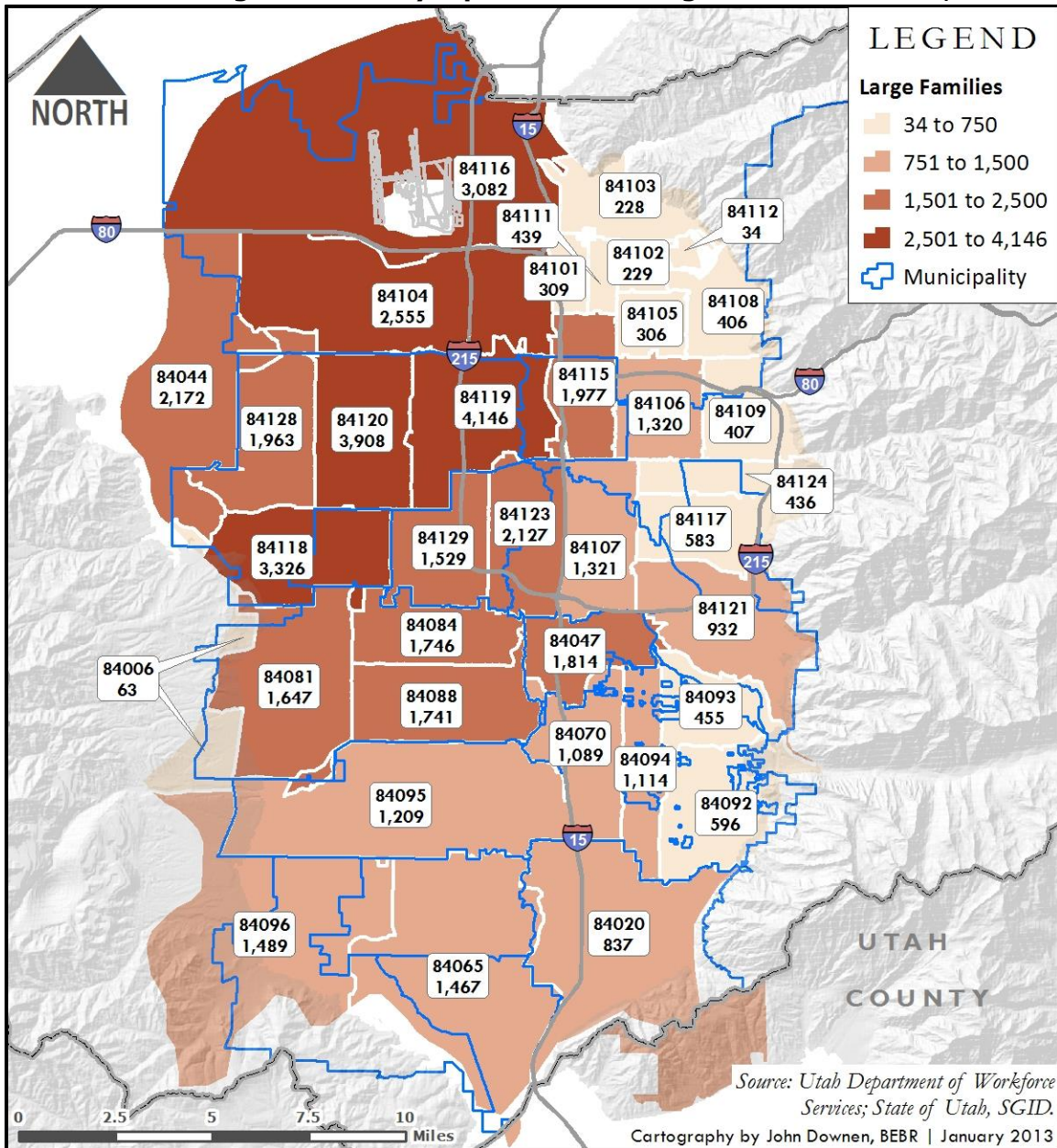


Table 16 shows the number of disabled individuals receiving public assistance in 2007 and 2012. To be considered disabled and on public assistance by DWS standards, each individual must be receiving financial assistance and have a verified condition by the Medical Review Board. West Valley City saw an increase of disabled recipients by about 27.5 percent, almost seven percentage points higher than the county. Again, the only zip code in the city to see a decline is the small zip code of 84170, which dropped from 6 disabled recipients in 2007 to 5 in 2012.

Table 16
Disabled Individuals on Public Assistance, 2007–2012

City	Zip Code	2007 Disabled	2012 Disabled	Absolute Change	Percentage Change
West Valley City	84120	1,101	1,474	373	33.9%
West Valley City	84127	—	1	—	—
West Valley City	84128	382	521	139	36.4%
West Valley City	84170	6	3	-3	-50.0%
West Valley City*	84119	1,644	1,997	353	21.5%
West Valley City Totals		3,133	3,996	863†	27.5%†
Salt Lake County		21,460	25,942	4,482	20.9%

*A portion of ZCTA was removed post 2007 to become part of ZCTA 84129 in Taylorsville, and therefore the totals are affected.

†The city total numbers are approximate because ZCTA had fewer than 10 recipients in 2007, so they were removed from the reporting and it is impossible to say what the exact change is. Instead the 2007 and 2012 totals are used to calculate change.

Source: BEBR Calculations from Utah DWS Data

Figure 22 maps the number of disabled individuals on public assistance in 2012 by zip code in Salt Lake County. Two of the three zip codes with the highest number of disabled recipients are in West Valley City, the third just east in South Salt Lake. Overall, the city has nearly 20 percent of the county’s disabled residents on public assistance. This is one of the highest rates in the county. Overall, a majority of the disabled residents on public assistance in the county tend to be centrally located in the northern cities surrounding the downtown metropolitan area of Salt Lake City. This could be due to low-cost housing, transportation options, or proximity to employment centers. Each of these factors highly dictates the ability for a disabled individual to be able to live and work. As a result, their housing options can be limited further from the downtown center, in the higher-opportunity areas of the county. Thus, West Valley City tends to have a lot of disabled recipients despite the low overall access to opportunity that the city provides (Figure 13).

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

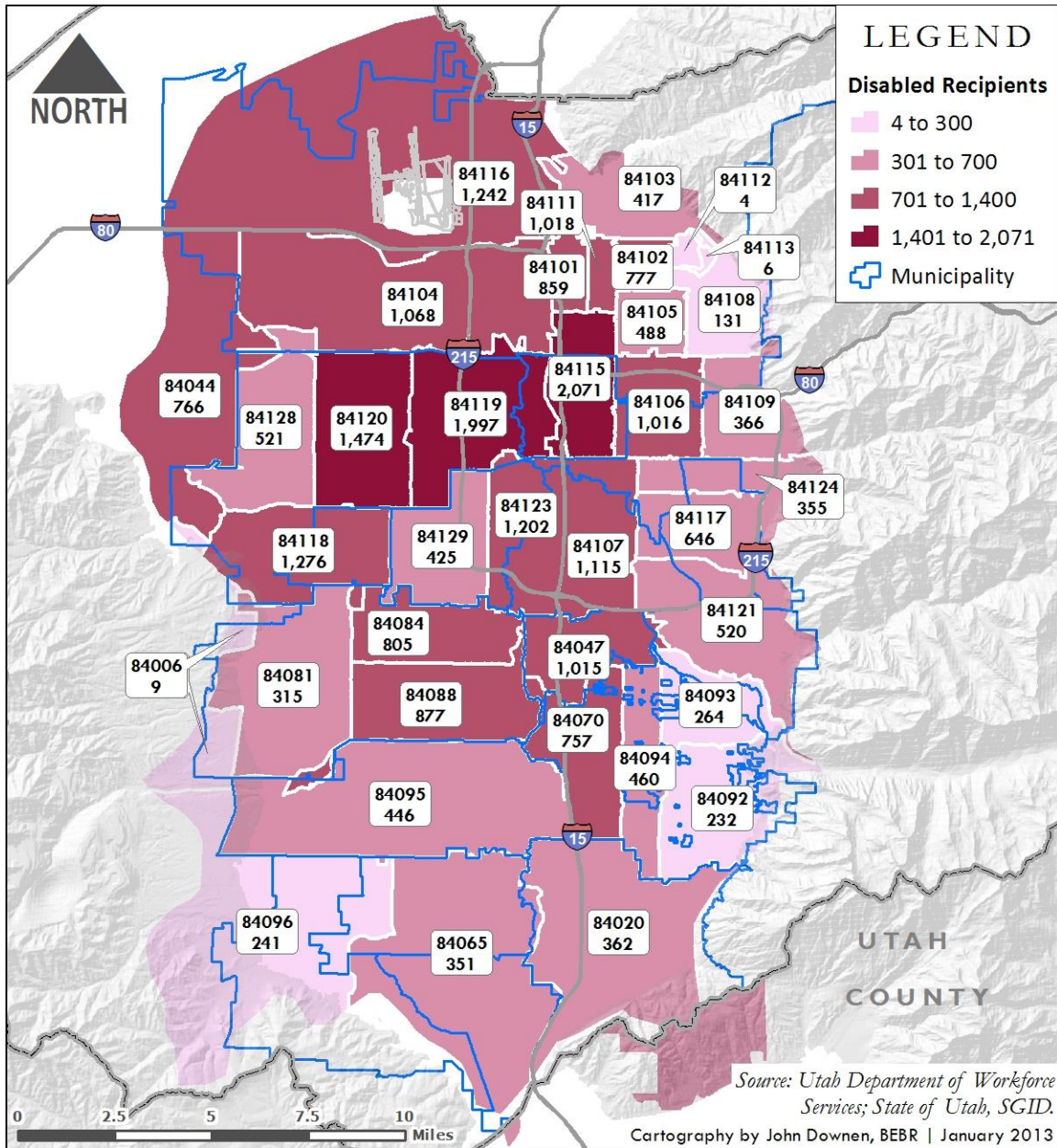


Table 17 uses the DWS data for the number of Hispanic individuals who received public assistance from the state in 2007 and 2012. Overall, West Valley City saw an increase in the number of Hispanic recipients by about 30 percent, almost nine percentage points higher than the county aggregate. In this particular case, not a single zip code in West Valley City saw a decline in the number of Hispanics on public assistance. The largest increase is in 84119, which even though a chunk of it was reallocated to become zip code 84129 in Taylorsville, still saw an increase of over 1,300 Hispanic recipients.

Table 17
Hispanic Individuals on Public Assistance, 2007–2012

City	Zip Code	2007 Hispanic	2012 Hispanic	Absolute Change	Percentage Change
West Valley City	84120	3,716	4,600	884	23.8%
West Valley City	84127	—	0	—	—
West Valley City	84128	1,465	2,098	633	43.2%
West Valley City	84170	6	10	4	66.7%
West Valley City*	84119	4,280	5,601	1,321	30.9%
West Valley City Totals		9,467	12,309	2,842†	30.0%†
Salt Lake County		37,911	46,019	8,108	21.4%

*A portion of ZCTA was removed post 2007 to become part of ZCTA 84129 in Taylorsville, and therefore the totals are affected.

†The city total numbers are approximate because ZCTA had fewer than 10 recipients in 2007, so they were removed from the reporting and it is impossible to say what the exact change is. Instead the 2007 and 2012 totals are used to calculate change.

Source: BEBR Calculations from Utah DWS Data

Figure 23 maps the number of Hispanic recipients in 2012 by zip code in Salt Lake County. Consistent with the location of minorities (Figure 17) and poor residents (Figure 13) in both West Valley City and the county, it is no surprise West Valley City and the neighboring zip codes have the highest number of Hispanic recipients. Overall, all the zip codes with the highest number of Hispanic recipients are in the northwest quadrant of the county. This could be attributed to a lack of adequate and affordable home in the southern zip codes, or a self-selection bias by Hispanic individuals wanting to live in neighborhoods with others who share similar social and cultural characteristics.

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

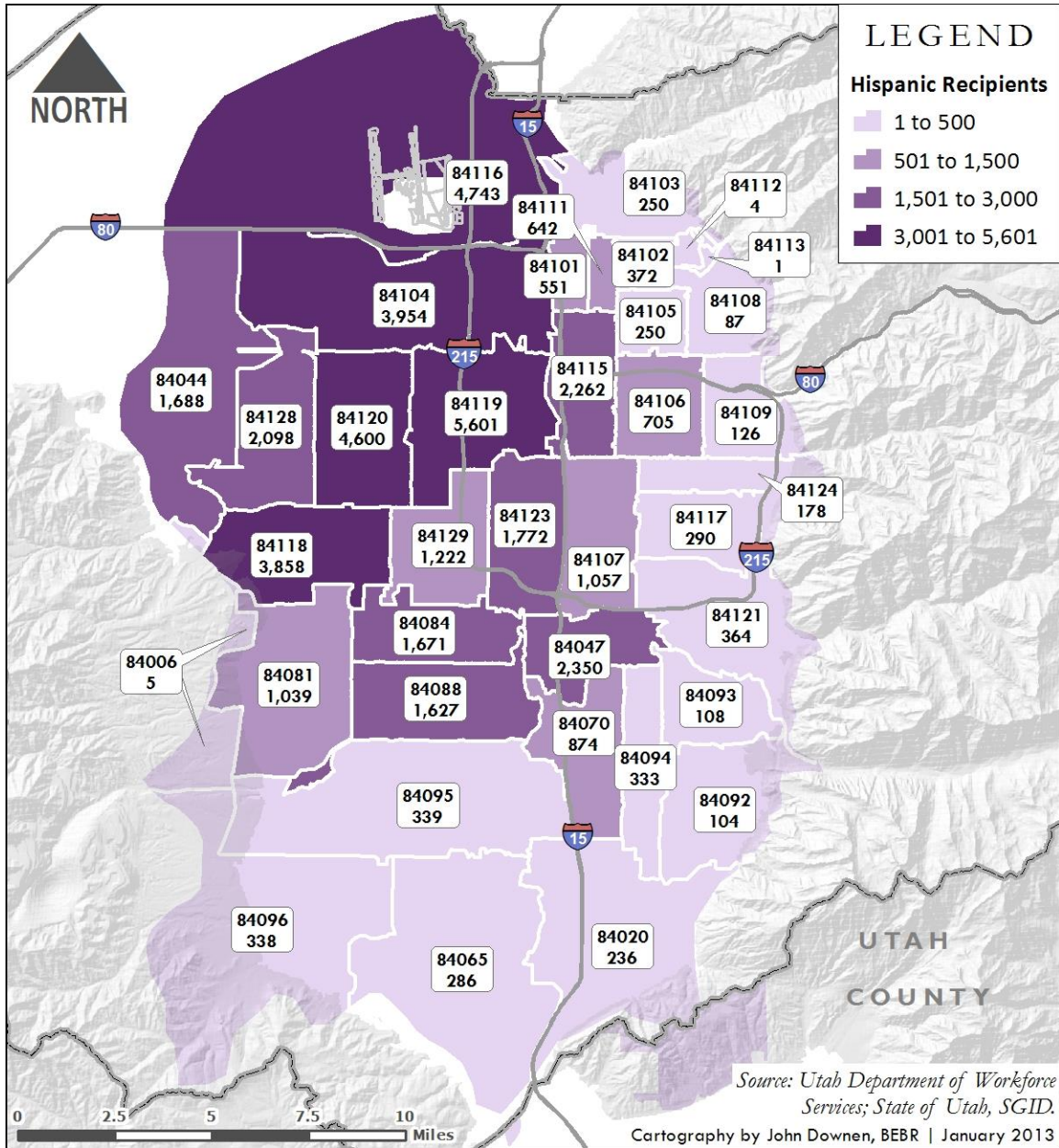
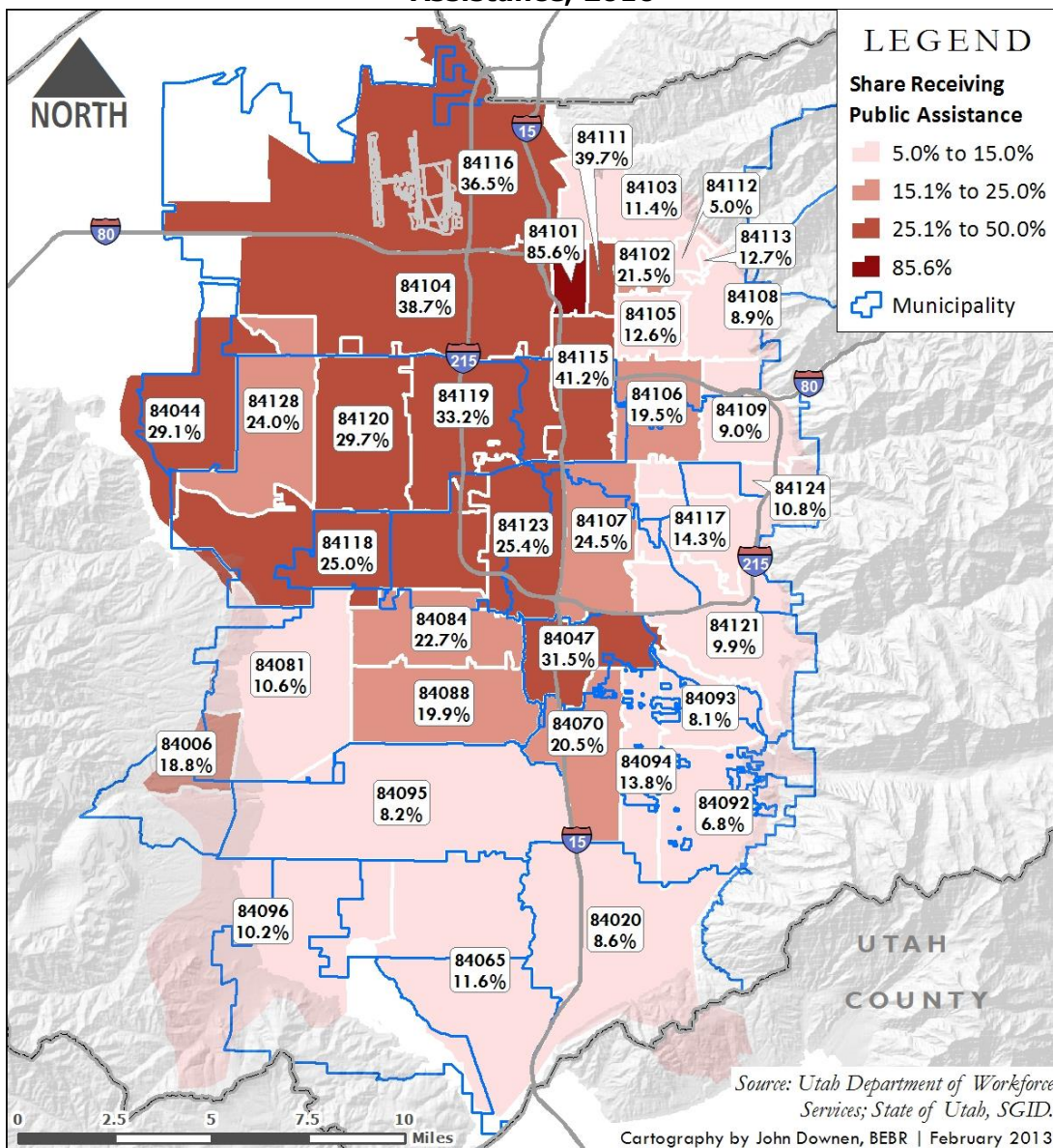


Figure 24 maps the percentage of individuals receiving public assistance in each zip code in Salt Lake County. Again, though the ZCTAs do not exactly correspond to the zip code boundaries used by DWS. Regardless, the general trends of public assistance recipients as a share of the region’s population can be seen. Again, there is a clear difference between the east and west sides of Interstate 15, and even more so the northwestern region and the southeastern region. Much higher proportions of the populations in the northwest and west are recipients of some form of public assistance from the state, especially in West Valley City and the neighboring zip codes. This shows a clear geographic disparity between the location of public assistance recipients, who tend to be among the protected classes, and those not on public assistance. Clearly, there is a disparity in the location of affordable and adequate housing options, as well as adequate access to employment and opportunity in the southern cities, and the location of minority, large family, and disabled public assistance recipients.

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



DISPARITIES IN OPPORTUNITY

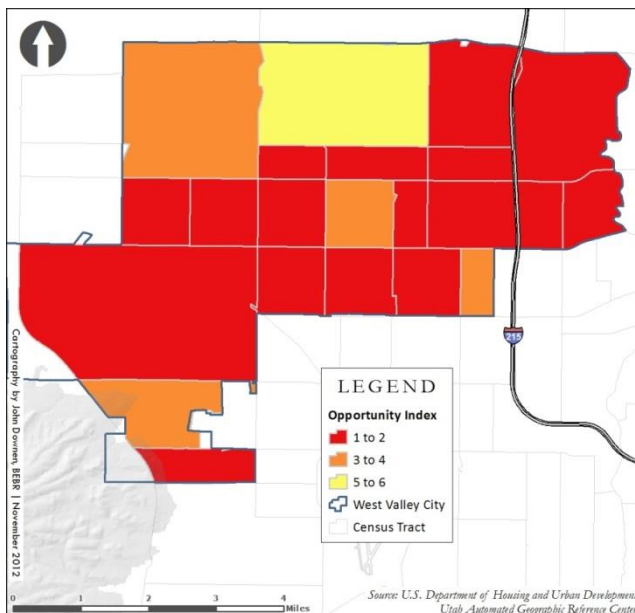
HUD provided six measurements of opportunity for each census tract with which to quantify the number of important “stressors” and “assets” that influence the ability of an individual or family to access and capitalize on opportunity. These six measures were aggregated to the city level using the population of each census tract within the city boundaries of West Valley City. Using the population of each tract within the city boundaries of West Valley City, it received an overall opportunity score of 2 out of 10, almost 3 points below the county average (Table 18). The most significant factors affecting this index in West Valley City are the school proficiency index and the housing stability index. For school proficiency, West Valley City gets a score of 1.6, compared to the county average of 4.3, and housing stability receives a score of 2.5, compared to the 5.3 county average. Both of these indexes are most likely indirectly affected by the high rate of poverty and low tax revenues from the low income and poor residents of the city. However, job access was the highest contributing index for West Valley, receiving a score of 5.4, the same as the county average, even though labor market engagement in the city is 1.9 points below the average. This indicates that there are many opportunities for employment, or at least adequate transportation to employment within the city. However, these benefits are not readily being exploited by a majority of residents. As job access ranks highly, and labor market engagement low, the employment issues in the city are not necessarily a result of transportation issues, but rather other factors.

Table 18
Weighted, Standardized Opportunity Index

	School Proficiency	Job Access	Labor Market Engagement	Poverty	Housing Stability	Opportunity
West Valley City	1.6	5.4	3.1	3.8	2.5	2.0
Salt Lake County	4.3	5.4	5.0	4.9	5.3	4.9

Source: HUD Spreadsheet for Sustainable Communities Grantees

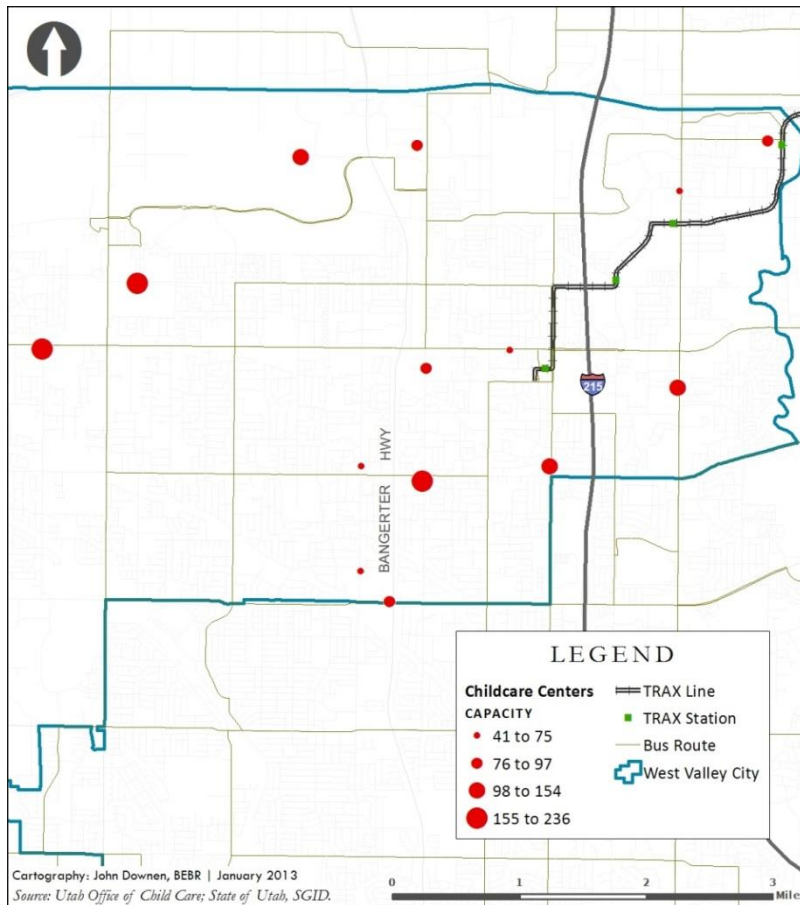
Figure 25
Opportunity Index by Census Tract in West Valley City



As shown in Figure 25, only one census tract received a score above 5. This tract, just west of Bangerter Highway and south of the 2100 South Freeway, is home to many business and corporations including an Intermountain Healthcare branch, Knight Transportation, and golf courses. As a result, it has high employment opportunities and is also a more affluent section of West Valley City, located close to major roadways running north-south and east-west. The lowest-scoring tracts are all located on the eastern side of the city, and down 3500 South to 4700 South. As shown in Figure 13, there is a high concentration of poor persons in these tracts. The tracts in the southwest corner of the city are of less concern since there are few residents in this area in general as it is mostly comprised of unoccupied land and the Hercules Power Plant.

Figure 26 maps the active childcare centers in West Valley City 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. This is especially important for Hispanics, who on average have larger household sizes than

Figure 26
Childcare Centers in West Valley, 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.

on public transportation and are therefore less mobile than other populations. Similarly, minorities, especially Hispanics, often have larger family sizes (Table 4) and they would arguably require these services at a disproportionately higher rate than other populations. Figure 26 does not show licensed families or residential certificates that also provide childcare. However, with a maximum capacity of eight children per provider, licensed families and residential certificates are unlikely to offset the need. Overall, the sparseness and general lack of adequate childcare services in the city can provide a major impediment to fair and equitable housing choice.

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, there are a few childcare center options, many within close proximity to the bus routes running through the city. However, considering the relatively low number of bus routes and highly residential nature of much of the city, there are few options for residents, especially those living in the northeast corner and southwest tracts. West Valley City has one of the highest poverty rates (Table 12) and a high prevalence of minorities, much of the city even having minority-majority populations. This can cause major impediments to housing choice as low-income and minority residents disproportionately rely

As a further assessment opportunity in West Valley City, 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, 29 of which are in West Valley City (Table 19). The highest scoring school is Diamond Ridge School, which received the only 6 of all the schools in the city. Overall, 19 schools scored a 3 or below, and as many as 5 of them received a school opportunity score of 1, the lowest score available. Not surprisingly, considering the school proficiency index from HUD (Table 18), the individual schools also rank low in terms of opportunity in West Valley City. This is more concerning, considering the high number of poor, minority and especially poor minority residents in the city (Table 12). As long as the children of protected classes are forced to attend low proficiency schools with little access to more opportunity, the opportunity gap between the privileged and disenfranchised will continue to widen.

Table 19
West Valley City School Opportunity

District	School	County Ranking	Opportunity Index
Granite	Stansbury School	197	1
Granite	Redwood School	196	1
Granite	West Lake Jr High	195	1
Granite	Hillsdale School	191	1
Granite	Monroe School	190	1
Granite	Jackling School	182	2
Granite	Valley Jr High	180	2
Granite	Granger High	179	2
Granite	Pioneer School	177	2
Granite	Granger School	174	2
Granite	Academy Park School	173	2
Granite	West Valley School	169	2
Granite	Hillside School	166	2
Granite	Hunter School	165	2
Granite	Robert Frost School	157	3
Granite	Valley Crest School	151	3
Granite	Hunter High	148	3
Granite	Douglas T. Orchard School	146	3
Granite	Rolling Meadows School	145	3
Granite	Carl Sandburg School	143	4
Granite	Hunter Jr High	141	4
Granite	Whittier School	113	5
Granite	Diamond Ridge School	102	6
Granite	Silver Hills School	—	—
Granite	Gerald Wright School	—	—
Granite	Harry S. Truman School	—	—
Granite	John F. Kennedy Jr High	—	—
Granite	Philo T. Farnsworth School	—	—
Granite	Young Parents Program	—	—

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 schools in each figure are red and orange, meaning that most of the indicators are affecting them negatively. Two of the schools that consistently seem to score well in each map is Monticello and East Hollywood High (an alternative school for filmmaking), both located in/near the highest opportunity tract in the city (Figure 25). Similarly, most of the lower-ranking schools are located in the northeastern portion of the city. Unfortunately, this is also an area densely concentrated with low-income and minority residents (Figure 13), as well as subsidized housing projects (Figure 18) and Section 8 vouchers users (Figure 19). As a result, there is a clear disparity in the access to opportunity between the protected classes and non-protected classes in the city.

Figure 27
Free/Reduced Lunch Eligibility in West Valley City, 2011

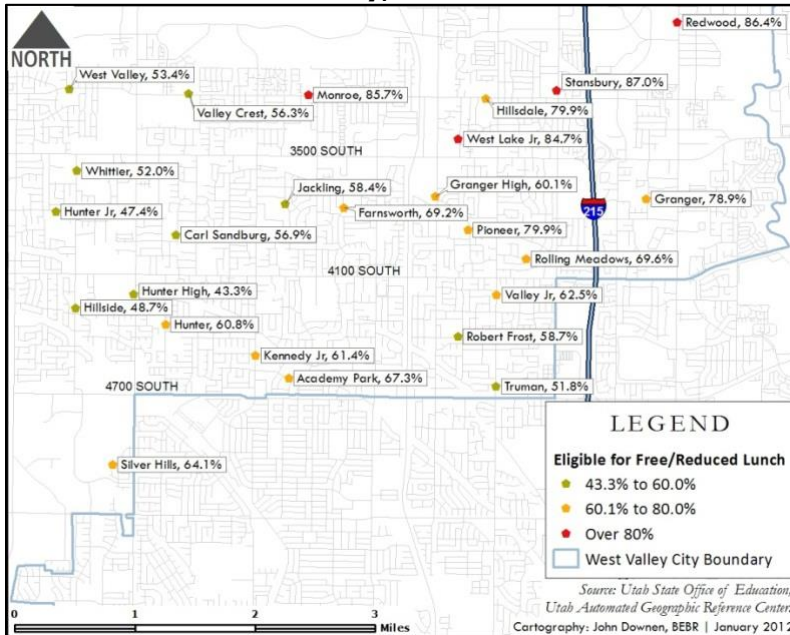


Figure 28
Free/Reduced Lunch Eligibility Change in West Valley City, 2005-2011

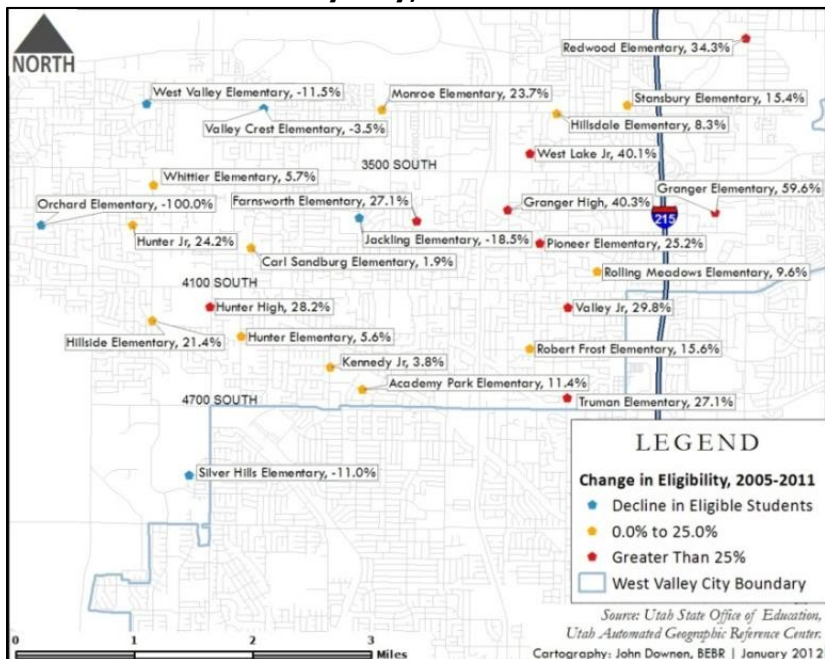


Figure 29
Share of Students Proficient in Language Arts in West Valley City Public Schools, 2011

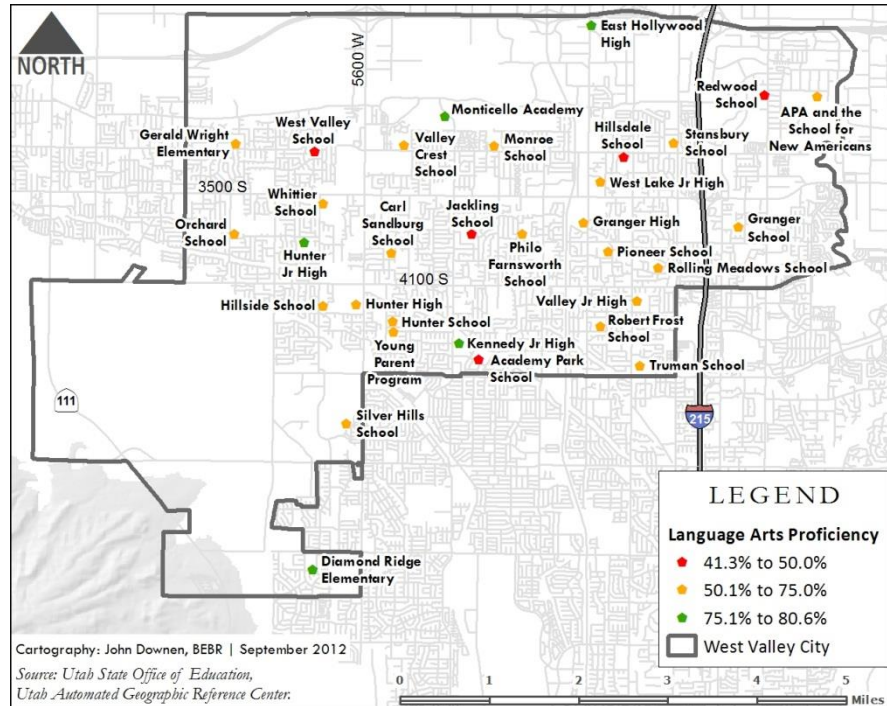


Figure 30
Share of Students Proficient in Science in West Valley City Public Schools, 2011

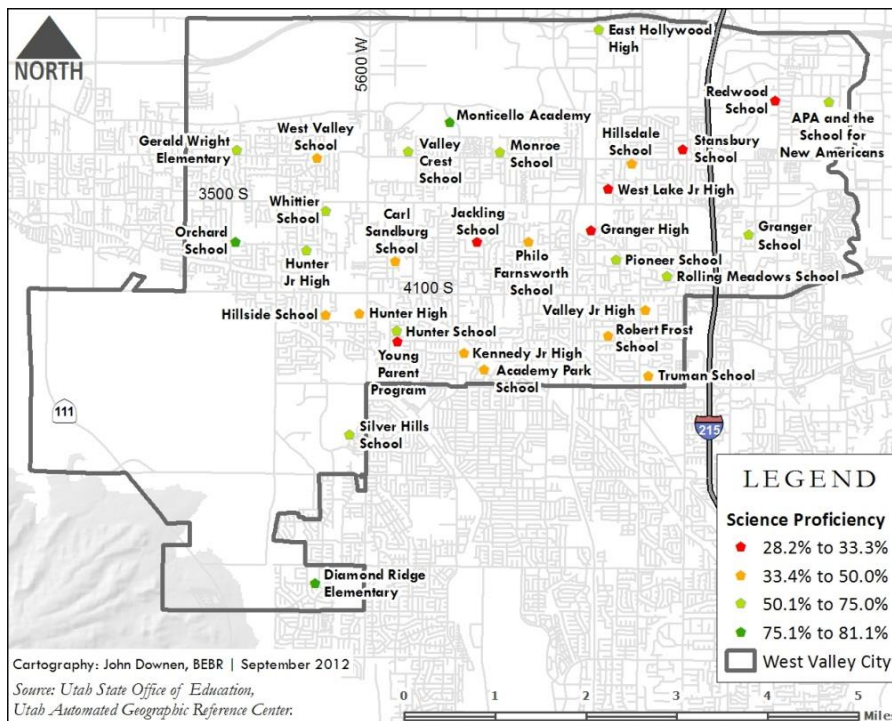


Figure 31
Minority Share of Enrollment in Public Schools in West Valley City, 2011

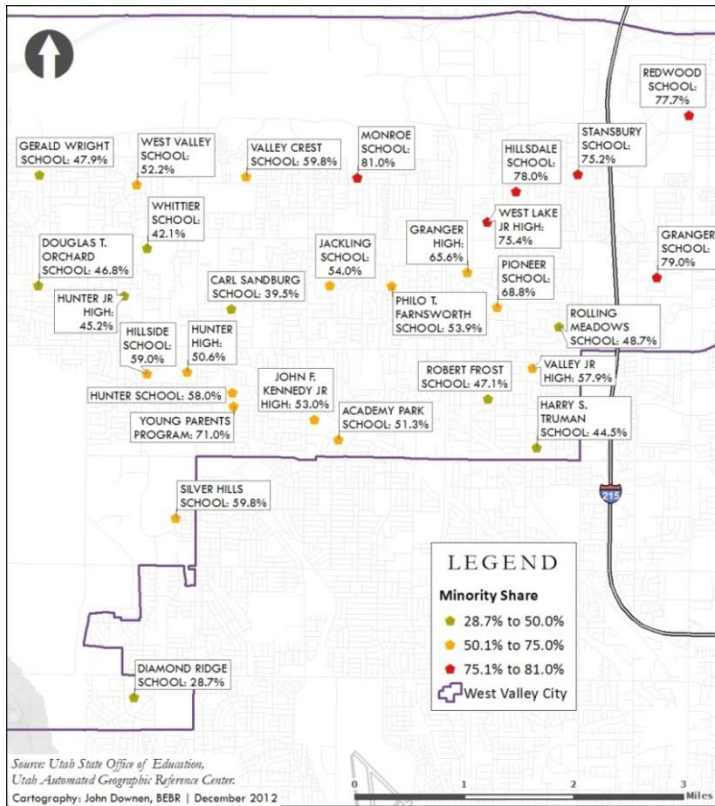
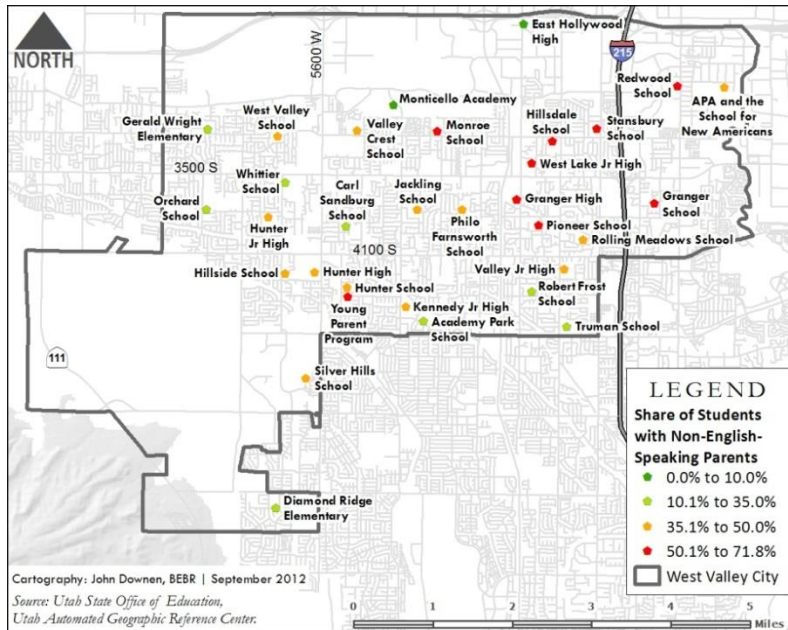


Figure 32
Share of Students with Parents of Limited English Proficiency in West Valley City, 2010



One way to measure the racial and ethnic diversity of an area is to use readily available public school enrollment data. Every year, the Utah System of Education collects data on the fall enrollments of each school in the state. Included in this data collection is data on race and ethnicity of each student enrolled in a public school in grades K through 12. In one particular survey, it allows each student to choose only a single race/ethnicity category, or select a multi-race category, creating distinct count per student. Allowing each student to only be classified by one race/ethnic category eliminates the issue of double counting individual students who identify as more than one distinct race. This allows for a unique analysis of racial and ethnic makeup of public schools in Utah. Similarly, the number of minority students enrolled in public schools can be used as a proxy for estimating the diversity of families residing in each city. Table 20 shows the 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
Diamond Ridge School	28.7%	1.8%	0.9%	2.4%	21.4%	0.3%	1.8%
Carl Sandburg School	39.5%	1.9%	2.1%	3.8%	23.7%	1.7%	6.3%
Whittier School	42.1%	2.9%	0.7%	2.1%	32.3%	0.3%	3.9%
Harry S. Truman School	44.5%	0.6%	2.9%	3.7%	29.6%	0.4%	7.4%
Hunter Jr High	45.2%	3.1%	2.0%	5.4%	30.1%	0.4%	4.3%
Robert Frost School	47.1%	2.9%	3.3%	4.3%	30.5%	0.0%	6.1%
Gerald Wright School	47.9%	1.7%	0.1%	3.6%	39.1%	0.2%	3.1%
Rolling Meadows School	48.7%	6.0%	3.8%	1.6%	32.9%	0.2%	4.2%
Hunter High	50.6%	1.9%	1.5%	4.9%	36.6%	0.1%	5.5%
Academy Park	51.3%	3.8%	0.2%	1.5%	38.6%	0.2%	7.1%
West Valley School	52.2%	3.0%	1.5%	4.5%	40.7%	0.0%	2.5%
John F. Kennedy Jr High	53.0%	2.1%	0.7%	2.2%	40.9%	0.5%	6.7%
Philo T. Farnsworth School	53.9%	3.6%	1.5%	1.6%	40.1%	0.4%	6.6%
Jackling School	54.0%	1.7%	1.9%	1.3%	40.7%	0.0%	8.4%
Valley Jr High	57.9%	4.6%	2.3%	5.4%	39.8%	0.0%	5.8%
Hunter School	58.0%	2.2%	0.2%	1.1%	48.5%	1.1%	5.0%
Hillside School	59.0%	3.4%	1.6%	7.8%	40.5%	0.0%	5.6%
Silver Hills School	59.8%	2.3%	1.9%	7.5%	45.2%	0.2%	2.7%
Valley Crest School	59.8%	3.5%	1.0%	9.7%	37.7%	1.1%	6.8%
Granger High	65.6%	3.9%	2.8%	5.8%	45.6%	0.2%	7.4%
Pioneer School	68.8%	3.6%	0.9%	6.1%	50.3%	0.0%	7.9%
Young Parents Program	71.0%	1.4%	5.8%	1.4%	59.4%	1.4%	1.4%
Stansbury School	75.2%	3.3%	2.6%	2.6%	59.1%	0.1%	7.4%
West Lake Jr High	75.4%	2.8%	2.8%	5.7%	57.6%	0.2%	6.4%
Redwood School	77.7%	5.2%	4.3%	4.8%	58.9%	0.2%	4.3%
Hillsdale School	78.0%	3.4%	1.7%	6.1%	61.4%	0.1%	5.3%
Granger School	79.0%	3.6%	2.0%	7.4%	60.3%	0.4%	5.4%
Monroe School	81.0%	2.0%	1.9%	2.6%	67.3%	0.0%	7.1%
West Valley City Totals	58.3%	3.0%	1.8%	4.5%	43.1%	0.3%	5.6%

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 are not organized or collected in the exact same manner, however 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.

As a result of its large size and suburban composition, West Valley City is home to 27 public schools, mostly elementary level. Overall, West Valley City saw a decrease in students from 2007 to 2011 of 621 enrollments across all schools. The largest decreases of any ethnic group are among non-Hispanic whites who saw a decline of almost 1200 enrollments in elementary schools and about 400 in high schools. Across all three levels of schools, total minority enrollments in the city increased. The largest increases were among the Hispanic/Latino students, with an increase of over 700 enrollments in West Valley elementary schools. For the most part, all other enrollment changes were relatively small in comparison. However, this shows the shift demographics in the West Valley schools and the entire Granite School District as disproportionately fewer non-Hispanic whites are enrolled and these schools and Hispanic/Latino enrollments continue to rise.

Figure 33
Total Minority Enrollment Changes, 2007–2011

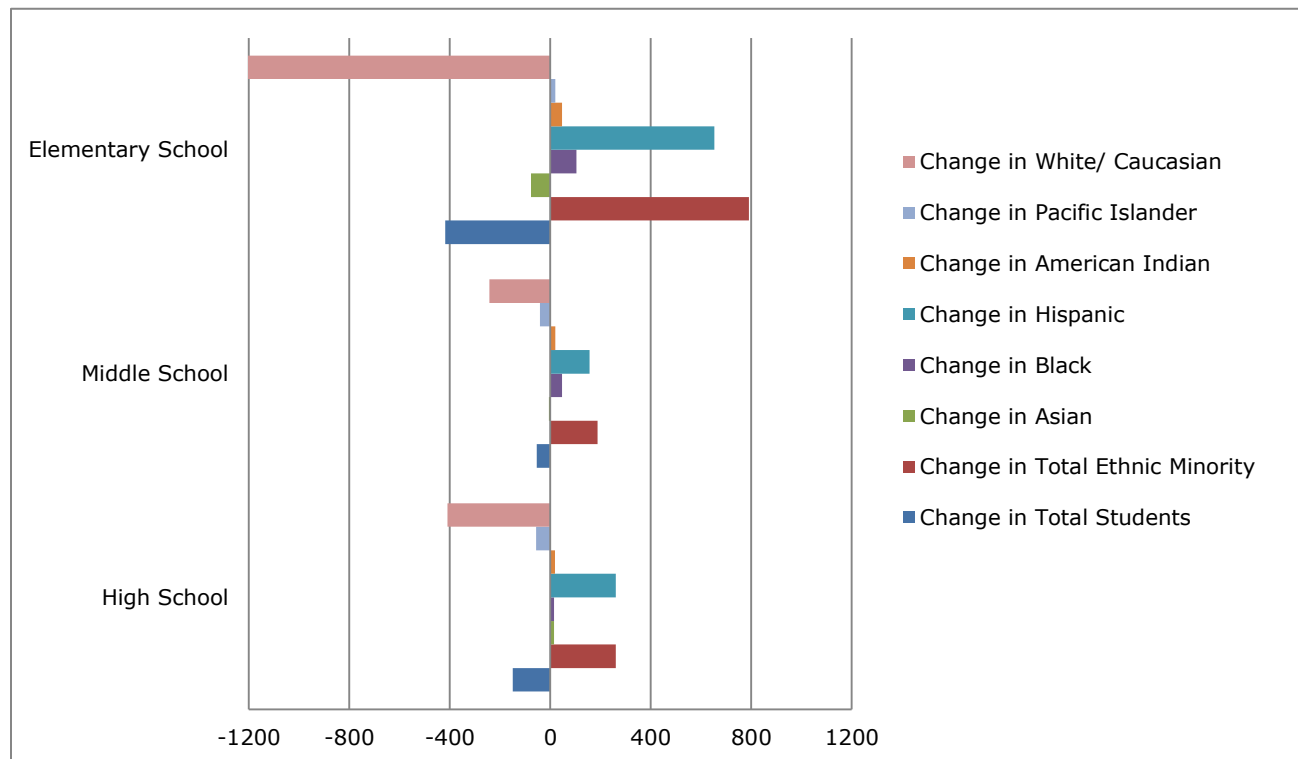
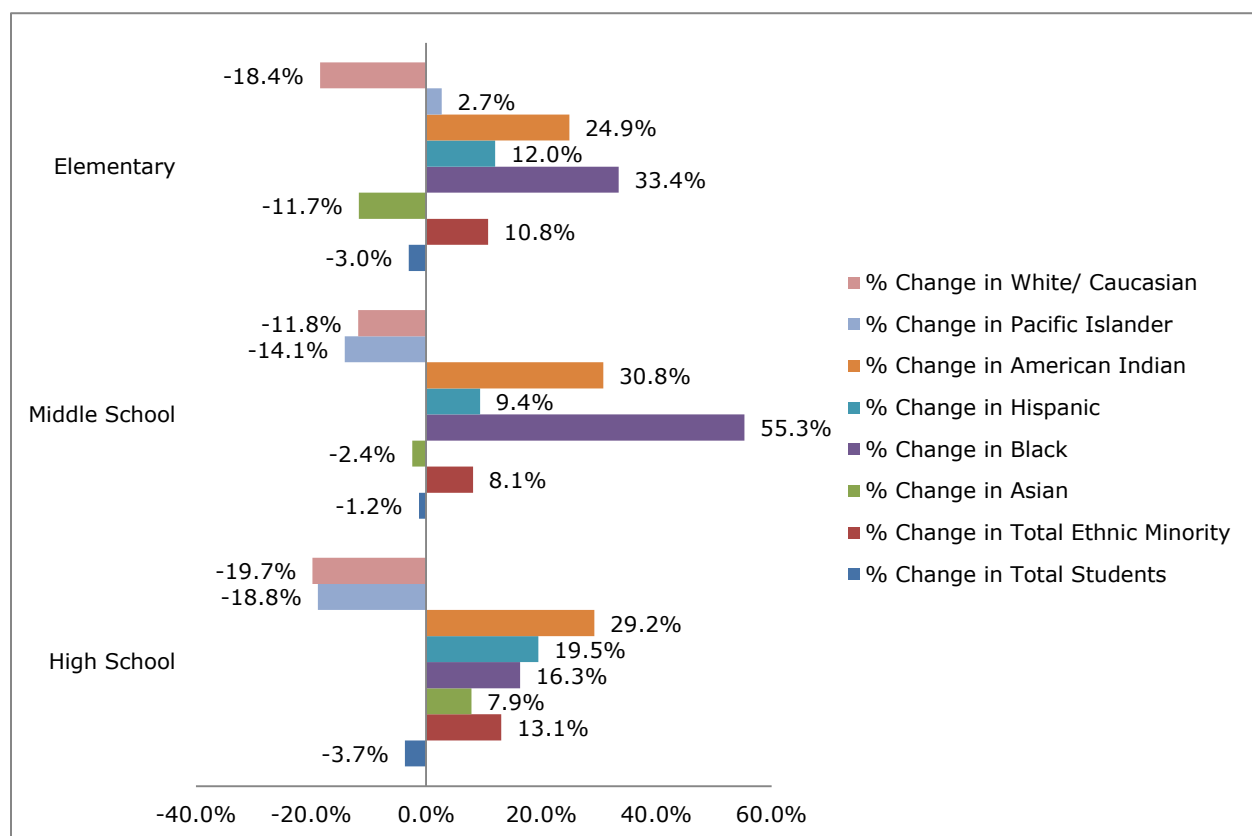


Figure 34 shows the enrollment percentage changes among the racial/ethnic groups in West Valley City by school level. Though the largest decrease in enrollments was among non-Hispanic whites in elementary schools, the largest percentage decrease was among non-Hispanic whites in high schools. Similarly, the largest percentage increase was among Hispanic enrollments in West Valley middle schools. Similarly, though the overall numbers of enrollment changes among the other ethnic minorities were small they account for large percentage increases for each school level. Across all levels of schools in the city, the total ethnic minority enrollments increased by about 10 percent. The only minority enrollment decreases were among Asian and Pacific Islander enrollments. However, due to their low overall numbers in general, these decreases do not equate to more than 75 enrollments for any one ethnicity.

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. Included in this analysis of West Valley City’s public schools is the unincorporated township of Magna. Due to the small size of the unincorporated township and the presence of its only neighboring city, West Valley City, Magna schools are considered a part of West Valley City. As a result, there are a total of 34 public schools considered a part of West Valley City. The percentage of LEP parents/guardians at each school in West Valley has

one of the largest range of any other city, second only to Salt Lake City. It ranges from 15.6 percent of the student body at Magna Elementary School having LEP parents to 72.3 percent at Monroe Elementary School, the highest rate in the county. Not surprisingly, 22 of West Valley City's 34 total public schools reports parental LEP rates above 35 percent. The total percentages at each school can be seen in Figure 35.

Figure 35
Percent of Students with LEP Parents, 2010

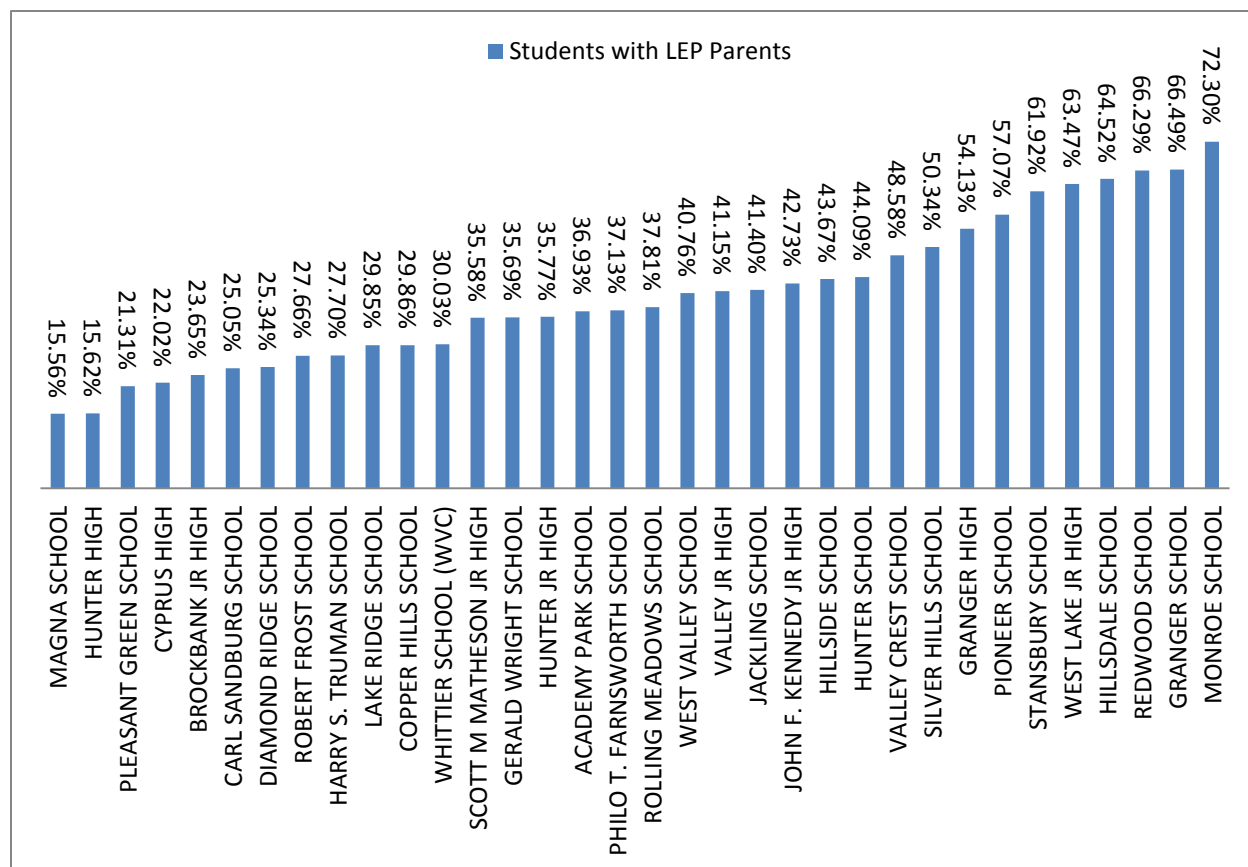
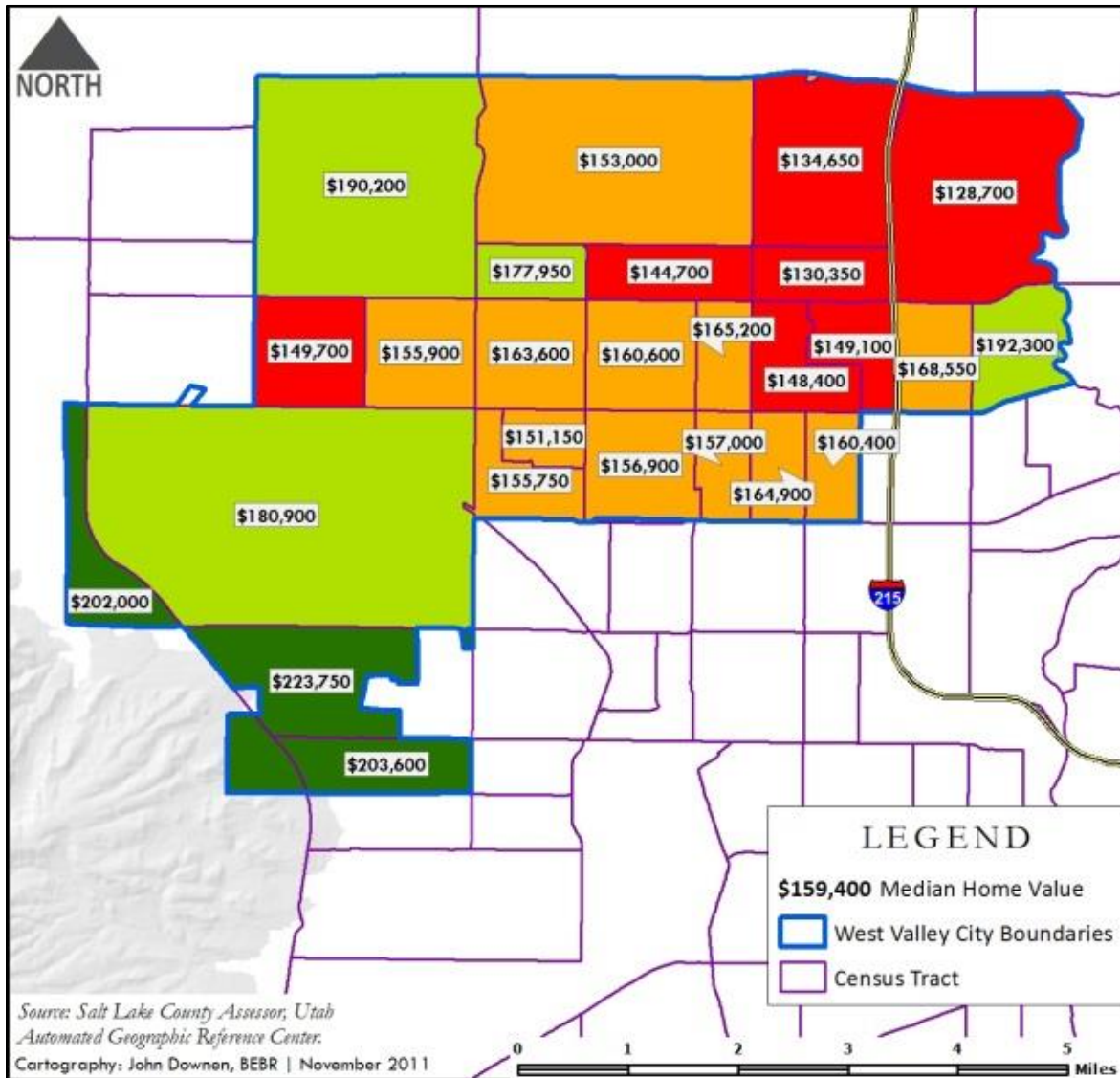


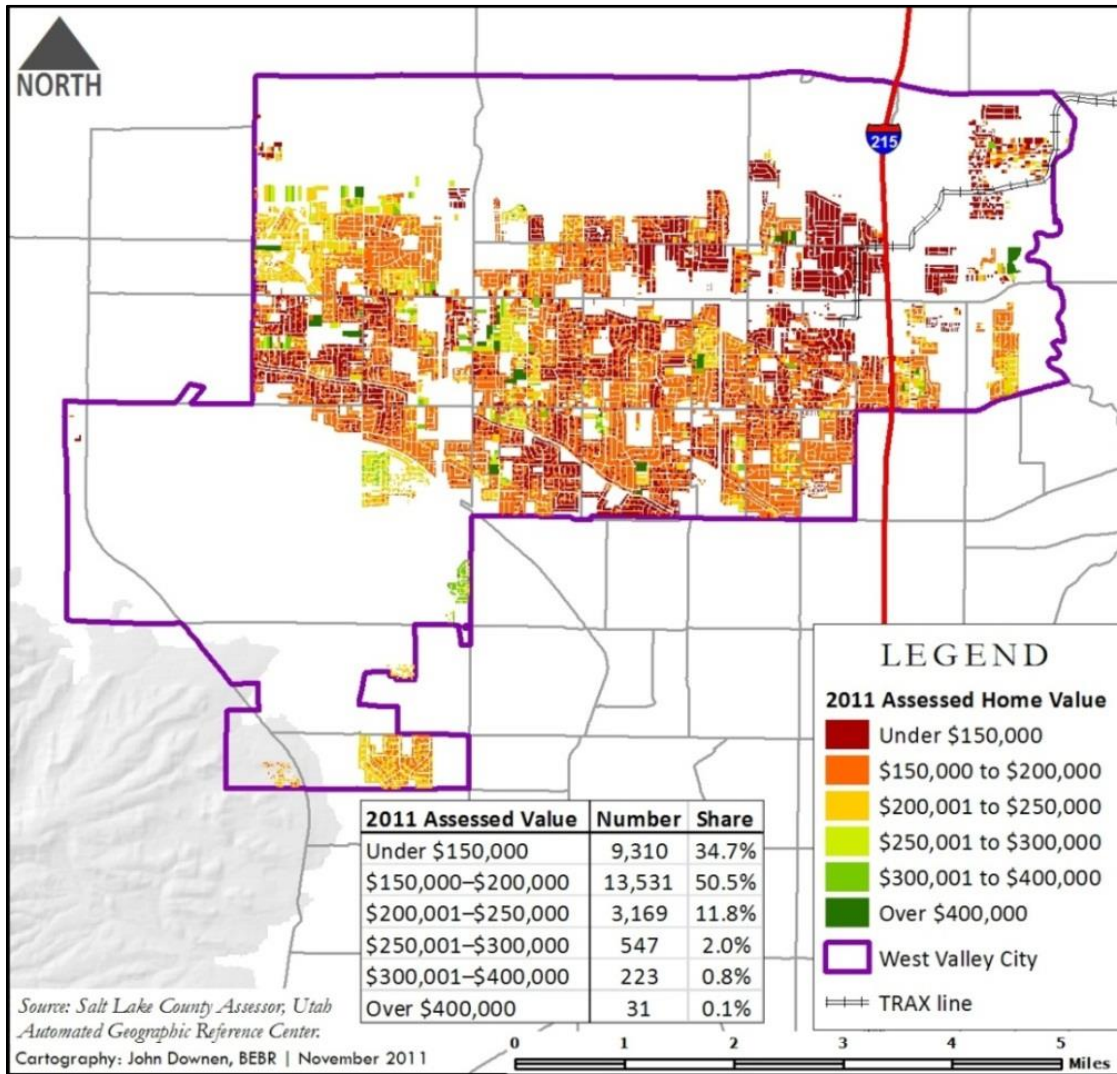
Figure 36 and Figure 37 show the 2011 assessed value of homes and the median home value by tract in West Valley City, respectively. Not surprisingly, the lowest assessed home values are located along the central strip of West Valley around 3500 South and 4700 South, the largest concentration being directly surrounding the end of the TRAX line just north of 3500 South. A similar concentration exists just north of 4700 South in the heavily concentrated area of poor American Indians (Figure 13). Not surprisingly, the concentration of census tracts with low median home values also exists in these areas, primarily in the northeast corner. The census tracts with the highest-valued homes are on the west side, primary in the southwest. Overall, a majority of the homes in West Valley City are valued quite low, most under \$200,000. Due to the lower home prices, there are more low-income and minority families living here, even though the access to opportunity is quite low in the city itself.

Figure 36
Median Home Value by Tract in West Valley City, 2011



Red and orange tracts have median value less than city

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



Foreclosed homes not only have a negative effect on residents who lost their homes, but can also negatively affect neighboring housing 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. Of all the zip codes in West Valley City, not a single one has a share of its housing stock in foreclosure less than that of the county aggregate. In fact, the city’s share of housing stock in foreclosure between 2008 and 2012 was almost a full percentage point above the county share. Overall, West Valley City had one of the highest overall foreclosure rates, though still less than all three of the southernmost zip codes in the county.

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

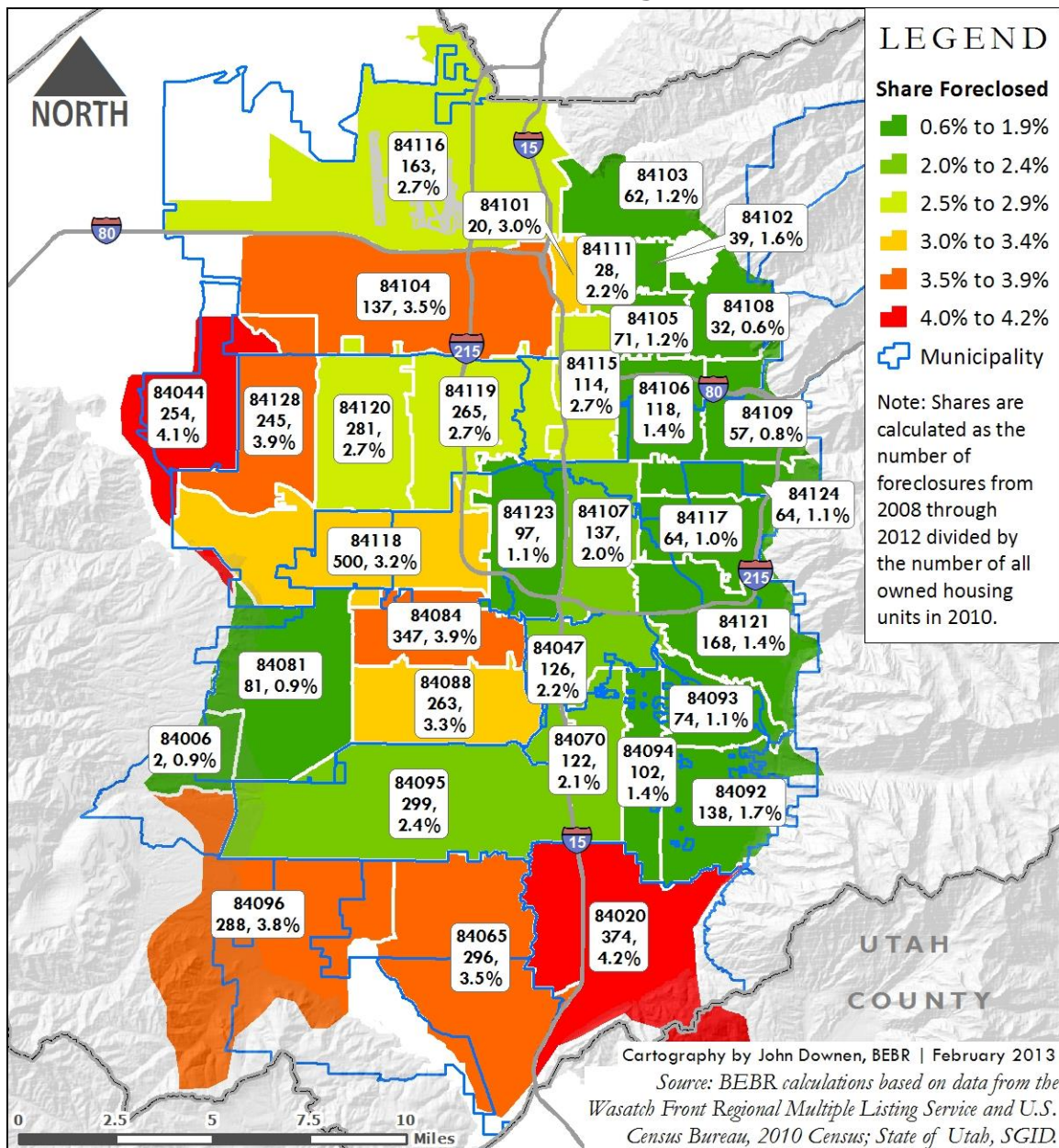
City	Zip Code Tabulation Area	Total Owned Units	Total Foreclosures for 2010 ZCTA (2008-2012)	Share of Foreclosed Homes
Bluffdale/Riverton	84065	8534	296	3.47%
Cottonwood Heights (and Big Cottonwood)	84121	11692	168	1.44%
Draper	84020	8852	374	4.23%
Herriman	84096	7597	288	3.79%
Holladay	84117	6588	64	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 2010 U.S. Census. Not surprisingly, the zip codes in northwest Salt Lake County, including those in West Valley City have a higher share of foreclosed homes. This is especially apparent when comparing the share of housing stock in foreclosure between the east and west sides of Interstate 15 in the northern and central parts of the county. Surprisingly, however, the foreclosure rates in West Valley City are less than those in the southern city zip codes like Draper, Herriman and Bluffdale. This could be due to higher rental rates or even lower home values in the northwestern zip codes, making it less likely that homeowners are unable to afford their mortgage and end up in foreclosure.

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



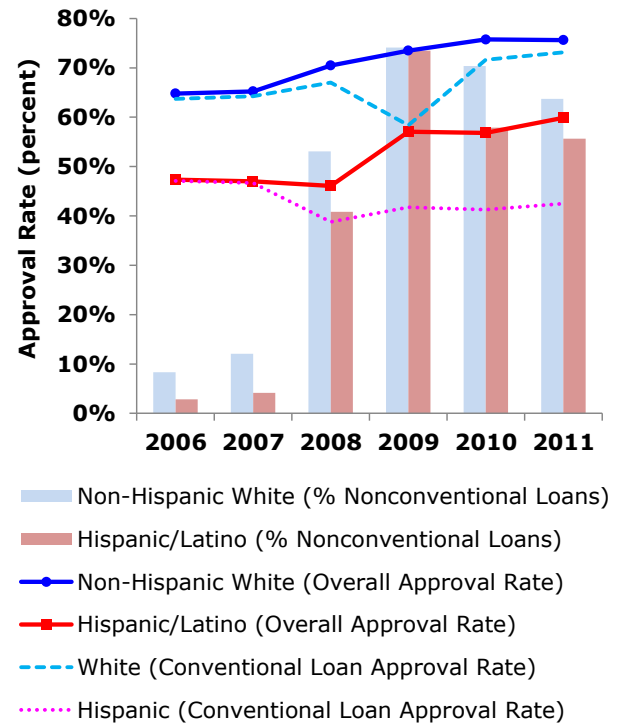
Lending Practices

- Approval/
Denial
Rates
(Figure 39)
- While nonconventional loans represented a small portion of total loans prior to 2008, nearly 3 out of every 4 loans were nonconventional in 2009.
 - The conventional loan approval rate for white applicants have not diverged significantly from the overall approval rate with the exception of 2010, which saw a 58 percent conventional loan approval rate compared to an overall 73 percent approval.
 - The Hispanic/Latino approval rate has slightly increased since 2009 even as the share of nonconventional loans began to fall from its 2009 peak.

- High-Interest
Loans
(Figure 40)
- Nearly 40 percent of Hispanic/Latino approved applicants received high-interest loans—a rate 2.5 times higher than among white approved applicants.
 - The neighborhood selection effect has increased since 2006.
 - Roughly a quarter of white and Hispanic/Latino applicants selected the less affluent City Centre/Decker Lane areas (roughly east of I-215) in 2006.
 - In 2011, nearly 40 percent of Hispanic/Latino applicants selected these neighborhoods compared to less than 20 percent of white applicants.

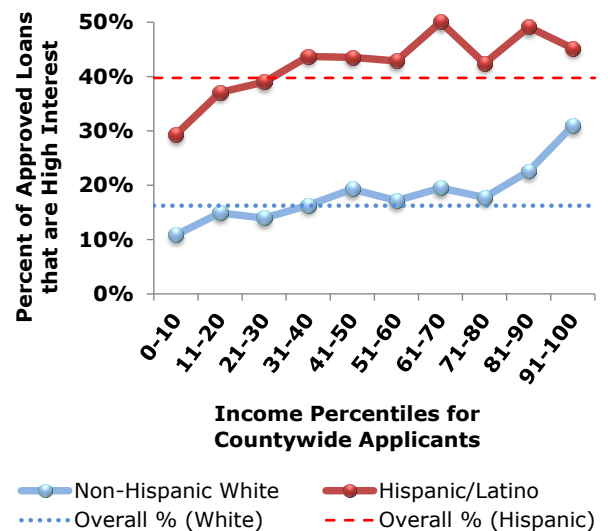
- Applicant
Income &
Loan
Amount
(Figure 43)
- The median loan amount among Hispanic applicants was higher than that of white applicants from 2007 to 2008. However, the median loan for Hispanic applicants decreased from \$152K in 2009 to \$102K in 2011. The median loan amount for white applicants decreased more slowly to \$120K in 2011, which is comparable to 2006 levels.
 - Since 2007, the median applicant incomes for both groups have fallen in tandem with Hispanic/Latino applicants trailing slightly behind their white counterparts.

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



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

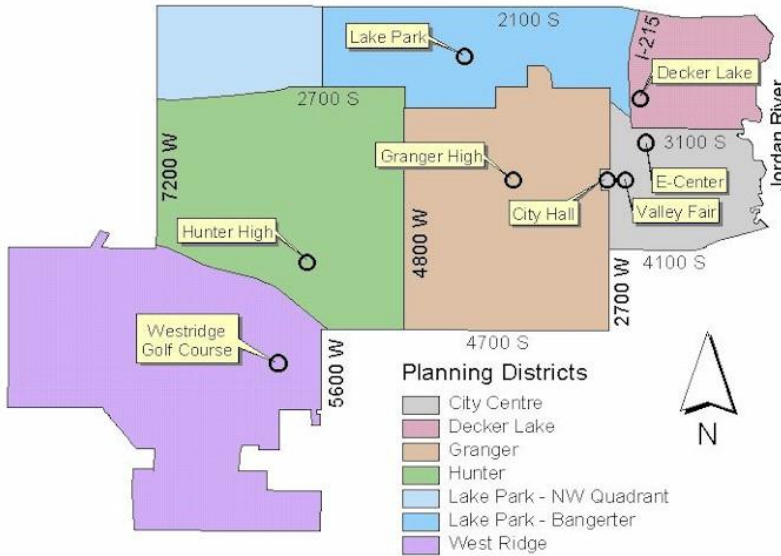
Figure 40
Percent of High-Interest Loans
by Income Level
West Valley, 2006–2011



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. Please refer to Figure 46 on page 56 for the corresponding income levels in nominal amounts.

**Figure 41
West Valley Planning Districts**

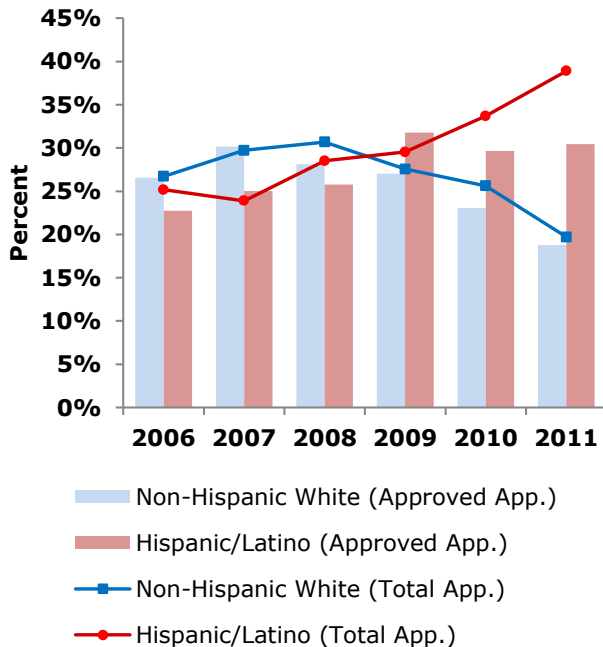


Source: West Valley City Maps

Figure 41 shows the West Valley planning districts, which were used to approximate neighborhoods in the city. The Decker Lane and City Centre planning district boundaries roughly encompass 2000 Census Tracts 1133.04, 1133.05, 1133.06, 1133.07, 1133.08, and 1135.09 (hereafter referred to as “Centre City/Decker Lane”). The remaining census tracts within the West Valley City boundaries approximate the Lake Park (NW Quadrant and Bangerter), Granger, Hunter, and West Ridge planning districts (hereafter referred to as “Hunter/Granger/Lake Park”). The west-side neighborhoods in

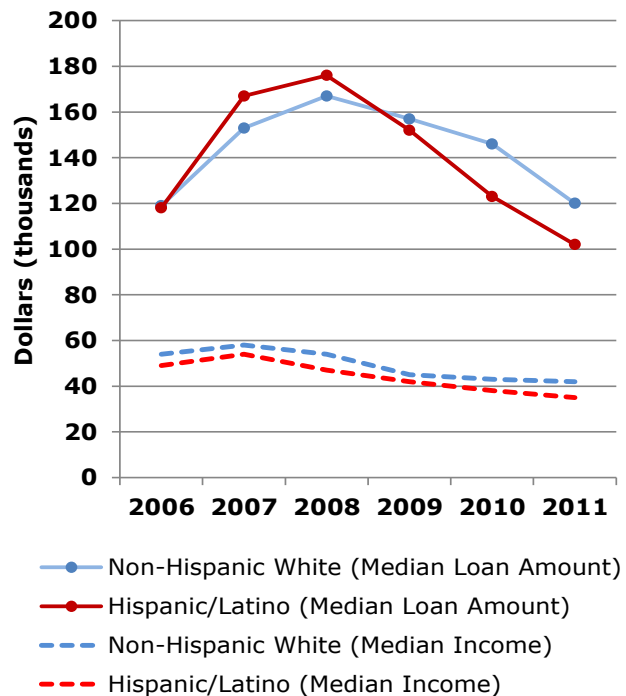
West Valley are relatively more affluent than the easternmost census tracts.

**Figure 42
Percent of Total/Approved Applications for City Centre/Decker Lane Properties by Race/Ethnicity West Valley, 2006–2011**



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

**Figure 43
Median Loan Amount and Income of Total Applicants by Race/Ethnicity West Valley, 2006–2011**

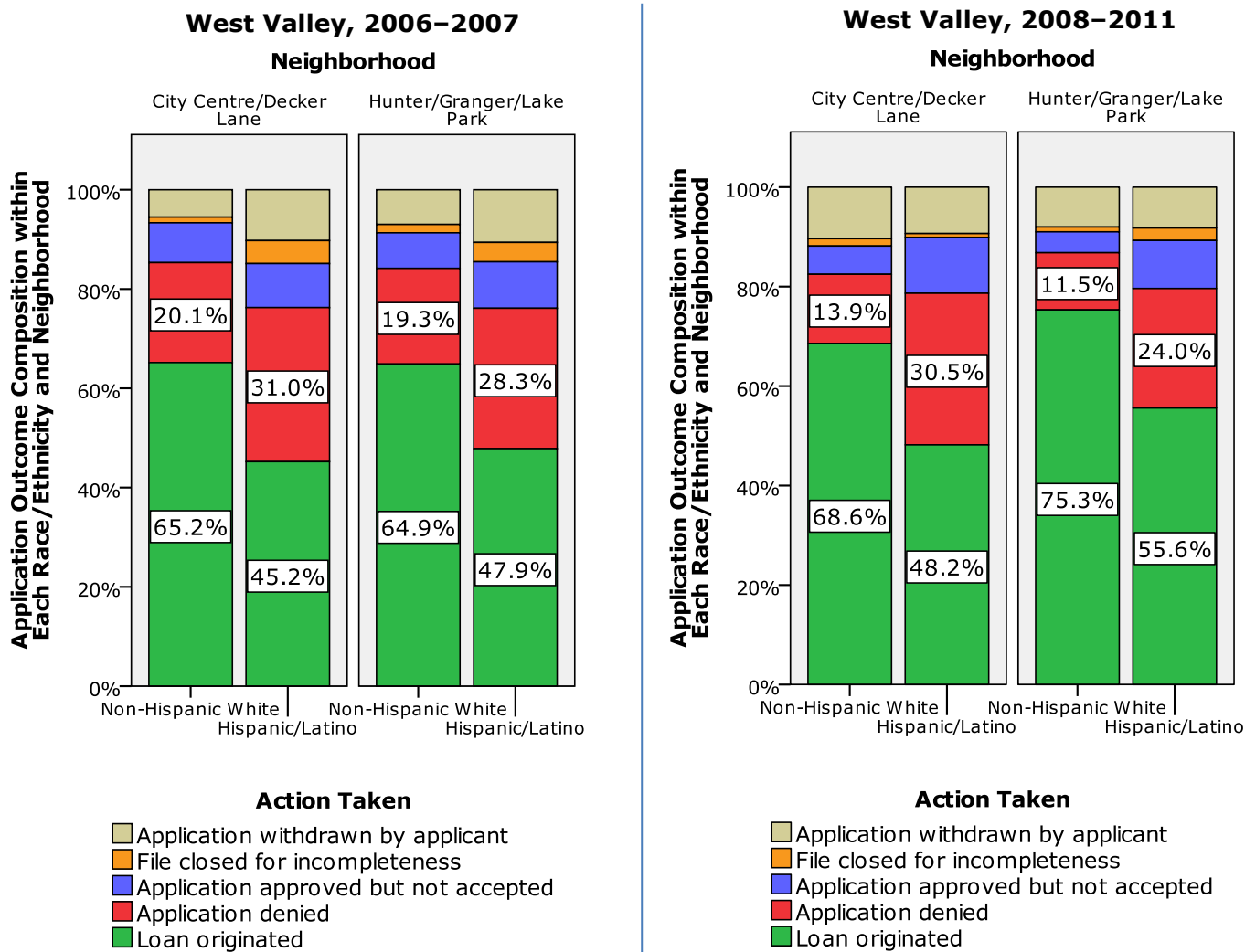


Source: HMDA LAR Raw Data by MSA (2006-2011)

Figure 42 shows the percent of prospective West Valley City homebuyers who selected the City Centre/Decker Lane neighborhoods. Since the housing market collapse, the share of Hispanic applicants who selected these neighborhoods has risen from under 25 percent in 2007 to nearly 40 percent in 2011. Meanwhile, the share of white applicants these neighborhoods decreased from 30 percent in 2007 to under 20 percent in 2011. Interestingly, white applicants applied for City Centre/Decker Lane neighborhoods at slightly higher rates than their Hispanic counterparts from 2006 to 2008 before the trend reversed and widened from 2009 to 2011. This widening gap could result in increasing segregation as white applicants increasingly select Hunter/Granger residential neighborhoods located west of I-215, while Hispanic applicants choose residential areas near the city center and commercial areas east of I-215. The median loan amounts for Hispanic applicants have fallen much more sharply than for white applicants from 2009 to 2011 (Figure 43), suggesting that Hispanic applicants have increasingly selected properties of lower value. The increasing self-selection effect among Hispanic applicants in selecting properties near the city center could also be a factor in the decreasing median loan amount trend.

Figure 44

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



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

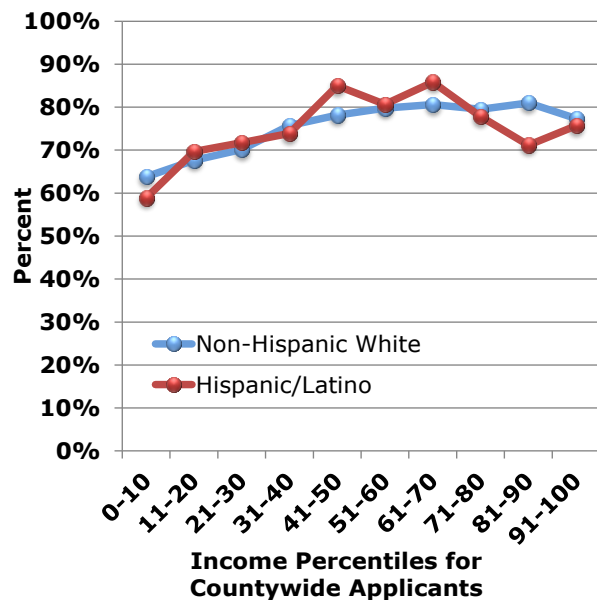
Source: HMDA LAR Raw Data by MSA (2008-11)

The approval process has slightly attenuated this gap. The bar graphs in Figure 42 show the share of approved applicants who selected the City Centre/Decker Lane neighborhoods. Most notably, even though nearly 40 percent of West Valley City-prospective Hispanic applicants selected City Centre/Decker Lane neighborhoods, only 30.5 percent of the Hispanic approved applicants chose properties in these areas. This means that Hispanic applicants who selected City Centre/Decker Lane neighborhoods are receiving a decreasing share of the total Hispanic approved mortgage applications in West Valley City.

Figure 44 shows the application outcomes by race/ethnicity, neighborhood, and housing period. From 2006 to 2007, the approval rate differentials across racial/ethnic groups were comparable across neighborhoods. The City Centre/Decker Lane approval rate for white applicants was 20 percentage points higher than for their Hispanic counterparts. The approval rate gap in the Hunter/Granger neighborhoods was slightly lower at 17 percentage points. Similarly, the approval rate gap for both neighborhoods was around 20 percentage points from 2008 to 2011. In fact, the change between the two housing periods lies not in the intergroup differences for each neighborhood but rather the intragroup gap across neighborhoods. In other words, the approval rate gap across racial/ethnic groups has persisted with the same magnitude from the housing boom to housing bust. However, while the approval rates within each group were fairly similar across neighborhoods during the housing boom, both groups saw approval rates that were roughly 7 percentage points higher in Hunter/Granger neighborhoods than in the City Centre/Decker Lane area. This suggests the applicant pool differs greatly by the selection of neighborhoods in West Valley City.

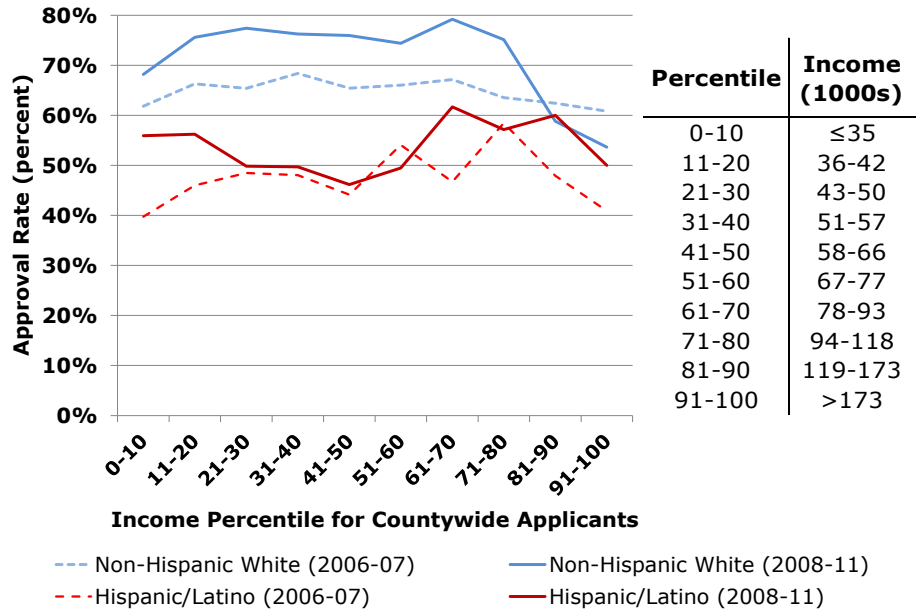
Perhaps Figure 45 better depicts the socioeconomic differences by the selection of neighborhoods. Figure 45 shows the percent of applications for properties in the Hunter/Granger neighborhoods by race/ethnicity and income decile. The income deciles were predetermined from the entire Salt Lake County HMDA dataset from 2006 to 2011, so these percentile ranges represent constant dollars, which are shown in Figure 46. Interestingly, while Hispanic applicants selected Hunter/Granger neighborhoods at lower rates than white applicants, the neighborhood selection effect nearly diminished when holding income constant. For both white and Hispanic applicants, the share of applications for Hunter/Granger neighborhoods gradually increased from roughly 60 percent at the lowest income bracket (below \$35,000/year) to nearly 80 percent at the highest income bracket (above \$173,000/year).

Figure 45
Percent of Applications for Properties
in Hunter/Granger Neighborhoods
West Valley, 2006–2011



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

Figure 46
Approval Rates by Income Level and Race/Ethnicity
West Valley, 2006–2011



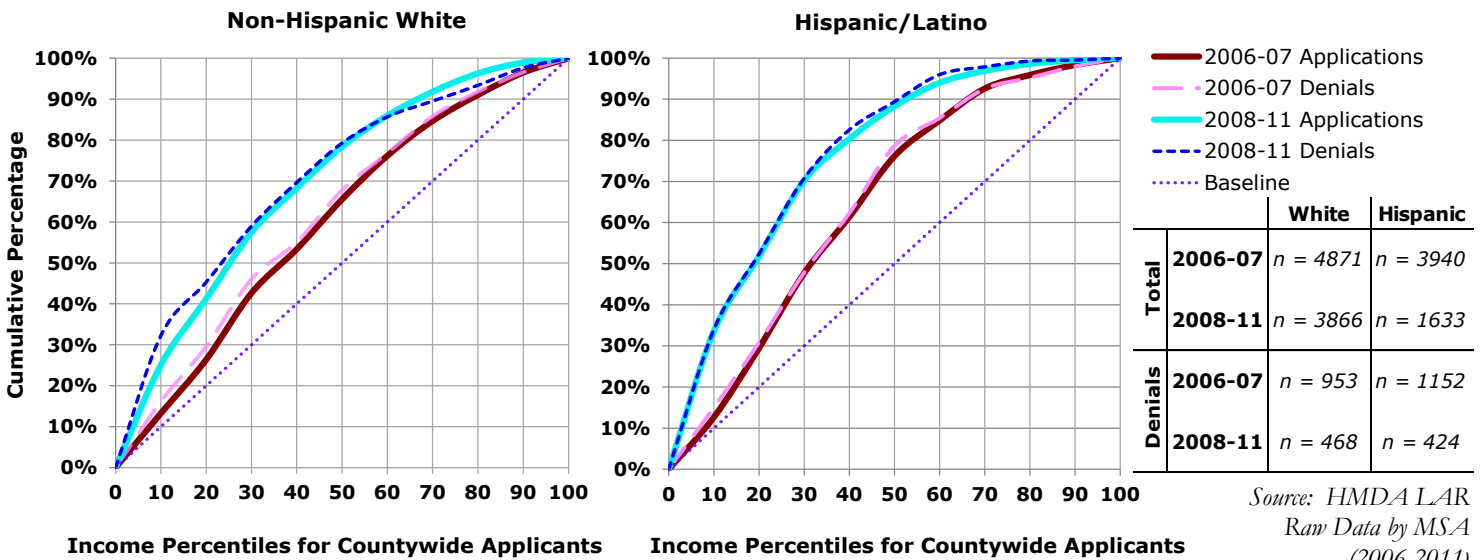
Despite the similar neighborhood selection patterns across income levels for both racial/ethnic groups, the approval rate gap does not diminish when holding income constant. Figure 46 shows the approval gap even when disaggregated by countywide income deciles. The dashed lines in Figure 46 are the approval rates during the housing boom, whereas the solid lines are the approval rates during the housing bust.

Note that the overall increases in approval rates from the housing boom to housing bust periods shown in Figure 46 can partly be attributed to the changes in loan type composition. Figure 39 shows that while only 2.8 percent and 8.3 percent of the 2006 West Valley City applications were nonconventional for Hispanic/Latino and white applicants, respectively, this rate rose to roughly 74 percent in 2009 for both groups. Despite the similarity of loan type composition for both groups from 2006 to 2011, white applicants have seen a larger increase in approval rates after the housing crash for all income levels below the 80th percentile (Figure 46). Interestingly, the approval rates for both groups are fairly similar above the

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 47
Cumulative Distribution of Applications and Denials across Income Levels by Race/Ethnicity



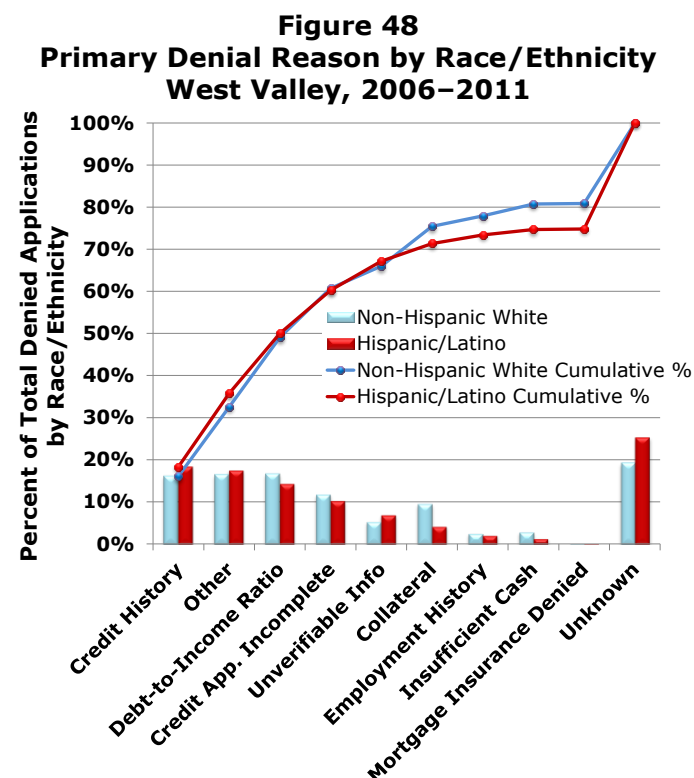
Source: HMDA LAR Raw Data by MSA (2006-2011)

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 46 on page 56 for the corresponding income levels in nominal dollar amounts.

80th percentile, because the approval rates for white applicants at the higher income brackets strangely plummeted to levels below 60 percent.

Figure 47 shows the cumulative distribution of applications and approvals by race/ethnicity and housing period. The distributions are cumulative across income deciles. 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 47 each overlay the cumulative application distributions with the corresponding cumulative denial distributions for the two housing periods. The cumulative distribution curves for both groups have become more convex during the housing bust, meaning the income distributions have shifted to lower income brackets. Interestingly, the cumulative income distribution of Hispanic denied applicants very closely aligned with the cumulative income distribution of total Hispanic applicants. Rather, white applicants at the lower income decile were receiving disproportionately more mortgage denials. While 25 percent of white applicants during the housing bust reported incomes at the lowest decile, nearly a third of the denials fell under this income category.



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

Although HMDA data do not include specific credit history information to develop a more conclusive analysis on the racial disparities in mortgage outcomes, the dataset includes denial reasons. Figure 48 shows the percent of denied applications by race/ethnicity attributed to each denial reason. The line graphs in Figure 48 show the cumulative percentage aggregated in the order that the denial reasons are listed on the horizontal axis. 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. Slightly under 45 percent of all denied applications for both groups were attributed to poor credit history, high debt-to-income ratios, and incomplete credit applications.

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

	Denials		Approvals	
	<i>Boom</i>	<i>Bust</i>	<i>Boom</i>	<i>Bust</i>
Non-Hispanic White	0.04	0.10	0.01	0.03
Hispanic/Latino	0.05	0.03	0.03	0.03

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

order to make the overall distribution and the approval/denial distributions identical. The Index of Dissimilarity section has a detailed explanation of this metric.

The indices suggest that Hispanic/Latino applicants are not receiving disproportionately more approvals at higher income levels and disproportionately more denials at lower income levels, since the overall distributions nearly mirror the approval and denial distributions. The indices of dissimilarity, however, cannot provide insight into disproportional allocation of denials and approvals by income. These indices simply show the percent of applicants that must move to another income decile in order to make the overall distribution and the approval/denial distributions completely identical. Thus, the indices of dissimilarity have to be considered in conjunction with the overall graphical representation.

Note that the non-Hispanic white index of dissimilarity for denials increased from 0.04 during the housing boom to 0.10 during the housing bust. This is also graphically evidenced by the disproportionate uptick in denied applications assigned to non-Hispanic white applicants at the lowest income decile during the housing bust (Figure 47). Since denials are not disproportionately concentrated among Hispanic/Latino applicants at the lower income brackets, inherent income disparities across racial and ethnic groups cannot explain the high mortgage denial rates among Hispanic/Latino applicants.

Lastly, 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

FAIR HOUSING INFRASTRUCTURE

West Valley City Housing Authority is the main authority in the city regarding fair housing equity and law. The office is relatively small, consisting of five employees working in all aspects of fair housing from applications to inspections to grants. However, they do maintain a website¹ with a single page dedicated to fair housing law. Though this webpage appears to only be offered in English, there is a link at the bottom of the page which connects a user to Google Translator services to help facilitate navigation in other languages. This website provides a short overview of fair housing law, including the types of discrimination covered under the Civil Rights Act of 1866 and Title VIII of the Civil Rights Act of 1968, including race, color, religion, sex, national origin, handicap or familial status. It also includes a short list of warning signs for discrimination and provides a outlet for discrimination complaints stating: “Fair Housing Discrimination forms can be picked up at: West Valley Housing Authority, 4522 West 3500 South, West Valley City, UT 84120.” This is the only means of complaint processing that the West Valley Housing Authority provides. Of course, this provides great limitations to the complaint form process as the forms have to be picked up in person and there are no online or phone in options available. This limits the ability of residents to obtain these forms as this requires travel to the location during their operating hours of 7 a.m. to 6 p.m. Monday to Thursday. This may be inaccessible to many residents due to their inability to easily travel to the HA office, public transportation limitations in West Valley City, and inconvenient hours for parents and working adults who are likely to be busy during these hours.

Regardless of the accessibility of the housing discrimination forms, the West Valley City Housing Authority does not field any actual complaints against fair housing and equity. Instead the complaints are passed along to the Utah Antidiscrimination and Labor Commission Division of HUD. The only times the housing authority deals directly with a complaint is when a resident feels discriminated against and is directly unhappy with the housing authority. This is reported to rarely happen, with a frequency of, about once a year. In addition to the complaint form, the HA provides posters, pamphlets and flyers as well as additional paperwork to all housing applications regarding fair housing law. Each of these materials is offered in both English and Spanish. They also provide orientations to all new applicants, refugees and residents involved with the West Valley City Housing Authority. Whenever these orientations are offered, the housing will set up a translator of other foreign languages as needed. Approximately twice a year, the HA offers training for landlords and owners, regarding fair housing policy and ordinances in the city. Likewise, the city participates in the Good Landlord Program which provides landlords with a discount on their business license for committing to keep in proper coordination with fair housing law and practices. Though the city has a forward-thinking plan in Vision West 2030, the Housing Authority has little to no involvement in the planning, beyond the offering of financial assistance for the construction of new affordable homes in the area. Likewise, the West Valley Housing authority has no plans to further expand their fair housing advertisement, complaint process or implement a city-specific fair housing complaint process in the future.

¹ <http://www.wvc-ut.gov/index.aspx?NID=323>

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.