Final Report
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Analysis of Impediments to Fair Housing Choice

Prepared for

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EXECUTIVE SUMMARY

Background and Purpose

The Fair Housing Act, first passed in 1968, prohibits discrimination with respect to most kinds of housing transactions—including rentals, home sales, mortgage lending, home improvement, and zoning—based on race, color, national origin, religion, sex, familial status, disability, and, in Utah, source of income and most recently, sexual orientation and gender identity.[1]

The Community Development Block Grant (CDBG) program, a component of HUD's Community Planning and Development (CPD) programs, contains a regulatory requirement to affirmatively further fair housing based on HUD's obligation under Section 808 of the Fair Housing Act. The ultimate goal of this requirement is to expand mobility and widen a person's freedom of choice in the housing market and, thus, their access to opportunities in their community and society at large. Because Logan City is receiving CBDG funding, the city is tasked with ensuring that it is affirmatively furthering fair housing. One way that cities and jurisdictions fulfill this requirement is through an Analysis of Impediments for Fair Housing Choice (AI). According to HUD's Fair Housing Planning Guide,[2] the AI involves:

(1) A comprehensive review of a State or Entitlement jurisdiction's laws, regulations, and administrative policies, procedures, and practices;
(2) An assessment of how those laws etc. affect the location, availability, and accessibility of housing;
(3) An assessment of conditions, both public and private, affecting fair housing choice for all protected classes; and
(4) An assessment of the availability of affordable, accessible housing in a range of unit sizes

HUD has undergone a devolution process in which the control of implementation, enforcement, and evaluation of fair housing policy is largely placed in the hands of local communities. HUD recognizes that the people who are most knowledgeable about the fair housing challenges their community faces are the people who live in those communities themselves. Therefore, AIs are intended to be a mechanism by which Fair Housing Planning (FHP) efforts are tailored to community needs and nuances while simultaneously adhering to federal Fair Housing Law (FHL) guidelines. Therefore, the purpose of the proposed AI is to provide Logan City with timely, relevant primary and secondary data analyses that will both fulfill their federal reporting mandates, and provide data-driven recommendations for fair housing action in the Logan community.

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[1] U.S. Department of Housing and Urban Development (2014). Fair Housing Trends Report 2014. Retrieved from: http://www.nationalfairhousing.org/Portals/33/2014-08-13_Fair_Housing_Trends_Report_2014.PDF.

[2] Fair Housing Planning Guide, Retrieved from: http://portal.hud.gov/hudportal/documents/huddoc?id=fhpg.pdf

Methodology

In accordance with guidelines laid out in HUD's Fair Housing Planning Guide, this AI follows the methodologies detailed below.

Public Participation. HUD requires that jurisdictions solicit input from community members, particularly those from protected classes. Four methods were used that involved public participation:

(1) The first involved the analysis of data from the "Fair Housing Snap Shot" study.[3] This study involved a community survey on the public's knowledge, attitudes and experiences related to fair housing and was administered in 22 Utah Counties (N=1,022). Data collected in Logan City comprised 23% of the sample (n=237). Logan City data from the "Fair Housing Snap Shot" study are described and mapped according to Census Block Groups in order to provide a context for the public's knowledge, attitudes, and experiences related to fair housing.

(2) The second involved the analysis of data from a qualitative study in which 8 key community stakeholders were interviewed in-person using a semi-structured interview guide. In-depth interview data from key community stakeholders in the private and public non-profit arena paints a more complete picture of the impediments to fair housing in Logan City. Content contained in the interview guide included questions based on stakeholders' perceptions of the prevalence of housing discrimination, the driving forces of housing discrimination, the ways in which Logan City is currently doing well to affirmatively address fair housing choice, and the ways in which Logan City could do better.

(3) The third involved the analysis of data from 6 in-depth, semi-structured interviews with individuals who had experienced housing discrimination while living in Logan City. These interviews were particularly insightful because they provided a contextual understanding of the community survey data that quantitatively described the prevalence of housing discrimination in Logan City. Individuals were recruited for interviews using a variety of efforts. Flyers were placed in over 30 locations throughout Logan City, including being posted in church bulletins, placed under windshields during Spanish Mass at St. Thomas Aquinas Catholic Church, and taped to doors at all affordable and accessible housing structures. Email recruitment messages were also sent to various human service providers and interested interviewees were also encouraged to spread the word. Recruitment occurred over the course of 1 month, and 6 individuals agreed to share their experiences.

(4) The fourth method that involved public participation in Logan City consisted of a 12 week study in which landlords and rental companies were contacted via email by hypothetical renters based on a systematic screening of advertised rental properties. Hypothetical renters' profiles were similarly qualified but manipulated by protected

[3] For details, see: http://laborcommission.utah.gov/media/pdfs/uald/pubs/FairHousingSnapShotProjectExecutiveSummary.pdf

class category. Randomization of hypothetical renters increased the validity of results. This study was undertaken in order to assess the extent to which landlords and rental companies may be screening interested rental applicants at first contact based on their protected class status. Landlords and rental companies were notified of the true purpose of the study following the 12-week study period. In total, 168 emails were sent, and responses were tracked, coded, and analyzed for patterns in responses.

Zoning, Land Use, and Housing Policy Review. A review of Logan City's land use regulations and other pertinent policies related to housing in order to identify potential fair housing impediments was conducted.

Analysis of Demographic, Housing, and Lending Data. Data were compiled from 2000 and 2010 Decennial Censuses as well as 3-year and 5-year estimates from the American Community Survey. Data on population, race/ethnicity, poverty, housing tenure, English proficiency, disability, household composition, housing type, housing problems, housing costs, and lending issues were described and/or mapped.

Identification of Impediments. Based on findings from the public participation, demographic, housing, and lending analyses, and policy review, fair housing impediments and concerns were identified.

Actions to Address Past and Current Impediments. Action items for addressing the noted fair housing impediments and concerns were identified for Logan City's use in fair housing planning efforts.

Impediments

Impediment 1. Racial/Ethnic concentration, particularly concentration of Latino individuals in SW portion of Logan City

Impediment 2. Racial/Ethnic spatial concentration of down payment assistance program participants

Impediment 3. Racial/Ethnic disparities in accessing housing rehabilitation program.

Impediment 4. Lack of public awareness and knowledge regarding their rights under the Fair Housing Law.

Impediment 5. Systematic discrimination in the rental market based on protected class status at first contact in seeking rental housing.

Impediment 6. Lack of affordable and accessible housing options for persons with disabilities.

Action Steps[4]

[4] Action steps are presented in further detail in the final section of the AI, including partners and timelines.

Impediment 1. Logan City investment in ESL/Literacy programs targeted at ESL Latino population that will expand economic opportunities and open up wider array of housing options across the city (particularly on the East portion of Logan City which has higher housing values).

Impediment 2. (1) Work with Neighborhood Nonprofit Welcome Home program administrator to expand program for Latino participants, including developing a program component that encourages participants to view available properties in all neighborhoods in Logan City. **(2)** Outreach to realtors and lenders to promote the program. **(3)** Translate application materials to Spanish.

Impediment 3. Increase outreach efforts to Latino community by first translating advertisements into Spanish with help from USU, and second, outreaching to key Latino community institutions to advertise the program (e.g., St. Thomas Aquinas Catholic Church, Spanish-Speaking Latter Day Saint Congregations, ELC, Latino Advisory Council, Bridger Elementary, USU's Access and Diversity, etc.)

Impediment 4. (1) Targeted educational outreach to vulnerable communities (e.g., persons with disabilities, refugees, LEP persons, etc.). Targeted outreach will involve distributing materials and offering to present to key social service agencies serving vulnerable communities (i.e. Cache Refugee and Immigrant Connection, English Language Learning Center, OPTIONS for Independence, etc.). Logan City will partner with BRAG, NNP, and USU to develop outreach materials. Logan City will work with USU to develop materials in Spanish. **(2)** Public awareness campaigns (e.g., during Fair Housing Month in April, make efforts on social media and in local newspaper to promote fair housing)

Impediment 5. (1) Targeted small-scale educational opportunities for landlords (e.g., informational packets prepared by CDBG coordinator to be sent to all landlords at time of annual license renewal). CDBG Coordinator will work with key professors at USU as well as individuals from Utah's Division of Fair Housing to create content-rich educational mailings. **(2)** Integration of this content in Good Landlord Training. The CDBG coordinator will work with key professors at USU to develop training materials that address the responsibilities of landlords under fair housing law.

Impediment 6. (1) Develop Logan City-sponsored program designed to provide financial assistance for individuals with disabilities who wish to rent housing units in the private market that are not already accessible (i.e., building entrance ramps, etc.). **(2)** The Access and Mobility Plan - Targeted outreach to disabled populations in Logan to collect data regarding infrastructure deficiencies in Logan City. The plan will prioritize improvements for future CDBG funding. The plan is a component of FH as it will reduce the amount of housing that are isolated from the surrounding neighborhoods, and goods and services. **(3)** Use RDA funds for housing rehabilitation assistance used for improvements to owner-occupied homes (including access/ADA issues).

SECTION I. COMMUNITY AND HOUSING PROFILE

This section provides a community and housing profile for Logan City. It includes demographic composition data for Logan's population as well as housing data. The sources for these data include:

- 2000 and 2010 U.S. Census
- 2008 to 2010 and 2010 to 2014 Estimates from the American Community Survey (ACS)
- 2008 to 2014 Federal Financial Institutions Examination Council data (FFIEC)
- 2015 Bear River Association of Governments Annual Housing data
- 2015 Options for Independence data
- 2015 Cache Refugee and Immigrant Connection (CRIC) data
- 2000 to 2010 U.S. Census Data Estimates from National Historical Geographic Information System

First, this section will simply present data, noting in the narrative where there may be cause for concern. At the end of this section, these data will be synthesized and analyzed in terms of their potential contribution to fair housing impediments.

Demographic Profile

Population. According to 2014 ACS 5-year estimates, Logan City's population is 48,933. This number reflects a 12.80% growth rate[5] since the 2000 Census (42,670).

Race and Ethnicity. Table I-1 shows Logan City's population distribution by race/ethnicity. Over the last 10 years, there was significant growth in most non-White racial/ethnic groups. Most notably, there has been a 51.8% increase in Hispanic or Latino persons since 2000.

Table I-1. Population by Race and Ethnicity, Logan City 2000 and 2014

Race/Ethnicity	2000	2014	Growth Rate
Not Hispanic or Latino:	39,151	41,655	5.99%
White Alone	36,458	37,568	(2.95%)
Black or African American Alone	253	563	**55.06%**
American Indian and Alaska Native Alone	327	322	(-1.55%)
Asian Alone	1,528	1,799	**15.06%**
Native Hawaiian and Other Pacific Islander Alone	123	297	**58.59%**

[5] In all demographic tables, growth rates are presented in the context of overall population growth rate or the overall growth rate within main categories (i.e. Not Hispanic or Latino vs. Hispanic or Latino) for Logan City between Census data points 2000 and 2014. When growth rates exceed overall growth rates, they are marked in **bold**. When they are less than overall growth rates, they are marked in parentheses. This distinction allows a comparison between nominal and real growth.

Some other race Alone	26	468	**94.44%**
Two or more races	446	638	**30.09%**
Hispanic or Latino:	3,509	7,278	51.79%
White Alone	1,489	4,305	**65.41%**
Black or African American Alone	19	55	**65.45%**
American Indian and Alaska Native Alone	34	68	(50.00%)
Asian Alone	9	0	(-900%)
Native Hawaiian and Other Pacific Islander Alone	2	0	(-200%)
Some other race Alone	1,714	2,394	(28.40%)
Two or more races	242	456	(46.93%)

Source: 2000 Census and 2014 ACS 5-Year Estimates

Nativity. Table I-2 below shows Logan City's population distribution by nativity. The city has experienced growth in both native and foreign-born populations, with a growth rate that is more than double for foreign-born persons, including naturalized citizens and non-citizens. However, the native-born growth rate is just less than the overall population growth rate in Logan City, suggesting that real growth in the native-born population is negligible. The majority of growth among the foreign-born population has occurred among naturalized citizens. Five-year estimates from the 2014 ACS indicate that 56% of Logan City's foreign-born population are Latin American, 28% are Asian, and 4% are African, with small percentages in other categories.

Table I-2. Population by Nativity, Logan City 2000 and 2014

Nativity	2000	2014	Growth Rate
Native Born:	38,541	43,460	11.32%
Foreign Born:	4,184	5,473	23.55%
Naturalized Citizen	640	1,494	**57.16%**
Not a Citizen	3,544	3,979	(10.93%)

Source: 2000 Census and 2014 ACS 5-Year Estimates

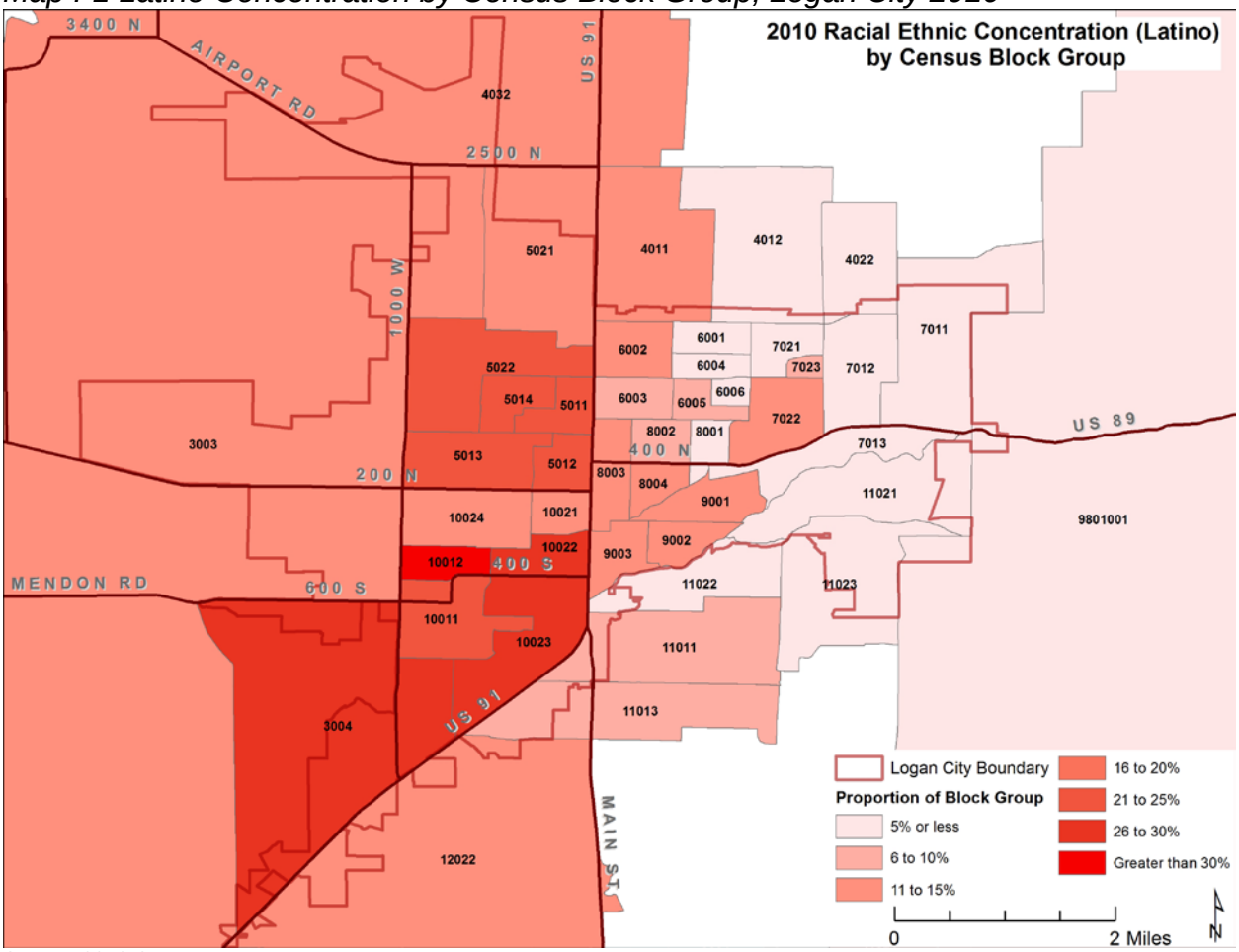
Refugee Population. Although data on Logan City's population is difficult to obtain in cities that are not refugee resettlement areas, Cache Valley Refugee and Immigrant Connection (CRIC) estimates that there are approximately 250 to 300 refugee individuals living in Logan City and surrounding cities in Cache Valley. The majority of refugees in Cache Valley come from Burma, Eritrea, Ethiopia, Sudan, Somalia, and Iran. Very few refugees in Cache Valley are recent arrivals having for the most part arrived in Salt Lake City several or more years ago.

Racial and Ethnic Concentration. HUD defines racial and ethnic concentration in numerous ways and these definitions have been used in other AIs.[6] One definition includes geographic areas in which the concentration of residents of a particular racial or ethnic group is 10% or higher than the community-wide average. A second, more stringent definition occurs when residents of a particular racial or ethnic group are concentrated in a geographic area at a rate 20% or more than the community-wide average. The former definition can be thought of as low concentration and the latter as

[6] See City of Boise's Analysis of Impediments to Fair Housing: http://pds.cityofboise.org/media/55843/fairhousingplan.pdf

high concentration. Because the predominant racial/ethnic minority group in Logan is Latino, racial and ethnic concentration was examined for this group in Map I-1 below. For the whole of Logan City, the Latino population constitutes approximately 15% of the community-wide population. According to the map below, there are three Census block groups in the South West quadrant of the city that meet the low concentration threshold (3004, 10023, 10022) and one Census block group in the same area that meets the high concentration threshold (10012).

Map I-1 Latino Concentration by Census Block Group, Logan City 2010



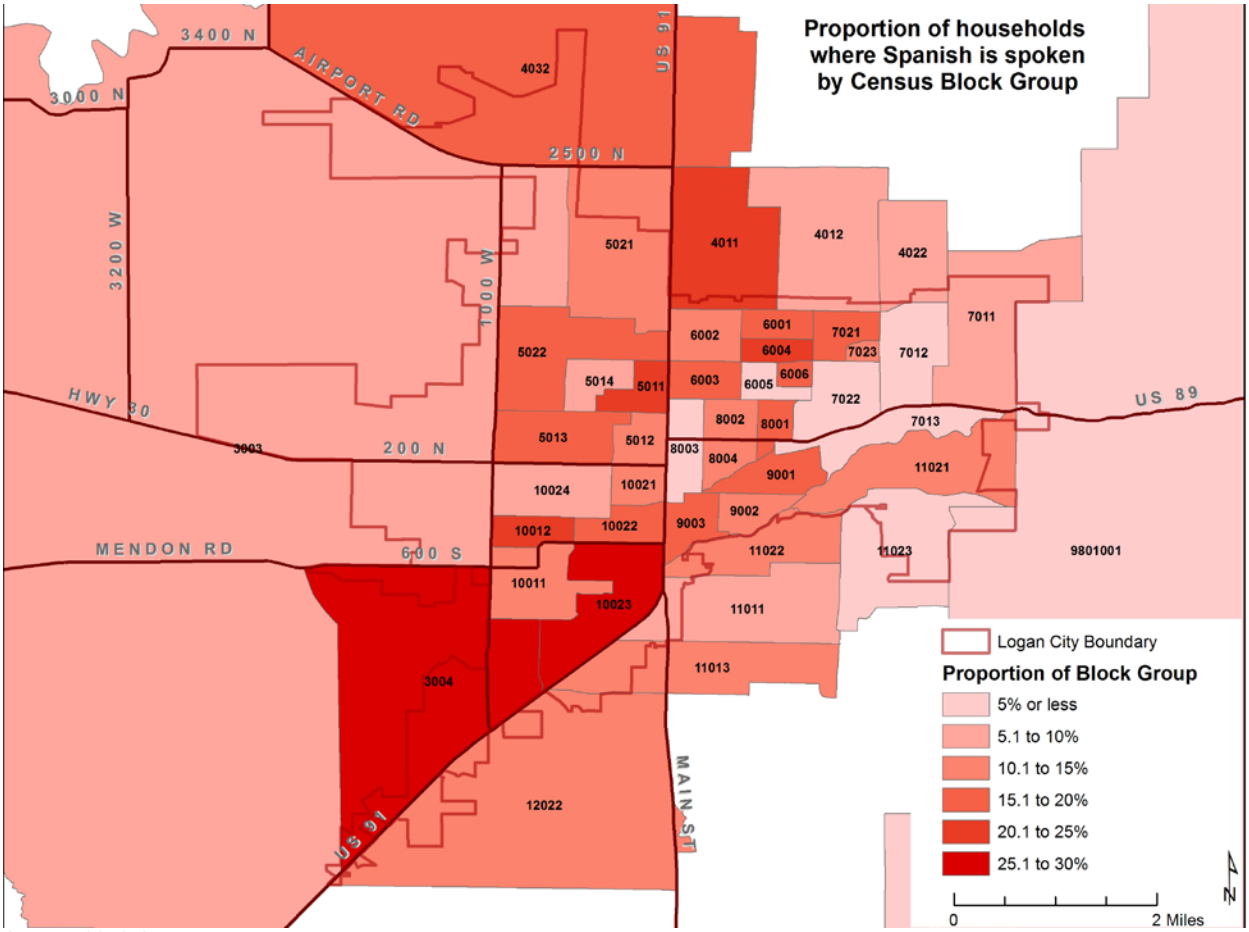
Source: 2010 Census

Racial and Ethnic Segregation. The index of dissimilarity (D) represents the extent to which two subgroups are proportionally distributed across a geographic area. Theoretically, the index measure denotes the percentage of the minority population which would have to move to another area in order to achieve proportional evenness. To examine the extent of racial/ethnic concentration in the area, trends in white-Hispanic dissimilarity indices are examined in Cache County, UT. It is not possible to calculate comparable dissimilarity indices for Logan City over decennial periods due to shifting Census tract and Census block group boundaries. However, the dissimilarity index for 2010 in Logan city was calculated and can be compared to the trends over time in the larger Cache County. In Cache County, the white-Hispanic D for 1990 was 27.0 and increased to 36.1 in 2000—that is, in 1990, 27% of all Hispanics would need to move to another area, and in 2000, 36.1% of all Hispanics would need to move to another area in order to achieve evenness. The white-

Hispanic D for 2010 in Cache County held relatively steady at 35.8. That is, in 2010, 35.8% of all Hispanics would need to move to another area in Cache County to achieve evenness. These numbers indicate that there has been a moderate increase in unevenness since 1990 that held steady in 2010. The white-Hispanic D for Logan City in 2010 was 30.9, slightly less than the D for the entire Cache County in 2010. Dissimilarity indices in this range are relatively common in cities and counties the size of Logan and Cache County. However, they indicate a growth in concentration over time, and are only 8-10% lower than D indices in Weber and Salt Lake County for comparison. In a hypothetical scenario in which white and Hispanic individuals are proportionally spread throughout Logan City neighborhoods, we would see a D index of 0. However, estimates suggest that nearly a third of the Latino population in Logan City would need to relocate to achieve evenness. Given that the D index has remained relatively steady despite a growth of the Latino population in Logan City between 2000 and 2010, it seems that racial/ethnic concentration is not increasing. Nonetheless, Logan City must be responsive to this issue. Specifically, it is important to identify the types, accessibility, and burdens associated with housing in these racially/ethnically concentrated areas. Additionally, it is important to note if housing programs are being accessed equally in these areas (e.g., housing choice vouchers, down payment assistance programs, housing rehabilitation programs, etc.). These issues are investigated in sections below.

Linguistic Isolation. Linguistic isolation is measured as the proportion of households where no one age 14 or older speaks English. Although there are various other racial/ethnic groups in Logan City that may primarily speak languages other than English (e.g., a 3% Asian population), linguistic isolation is examined in the context of Spanish speakers given the larger proportion of Latino individuals who reside in Logan City. In Map I-2 below, it shows that Spanish is spoken in the home for 10% or more households in more than two-thirds of Logan City Census Block Groups. Consistent with the areas of Logan City that have low and high racial and ethnic concentration, the block groups with the highest proportion of households that speak Spanish are located in the South West quadrant of the city.

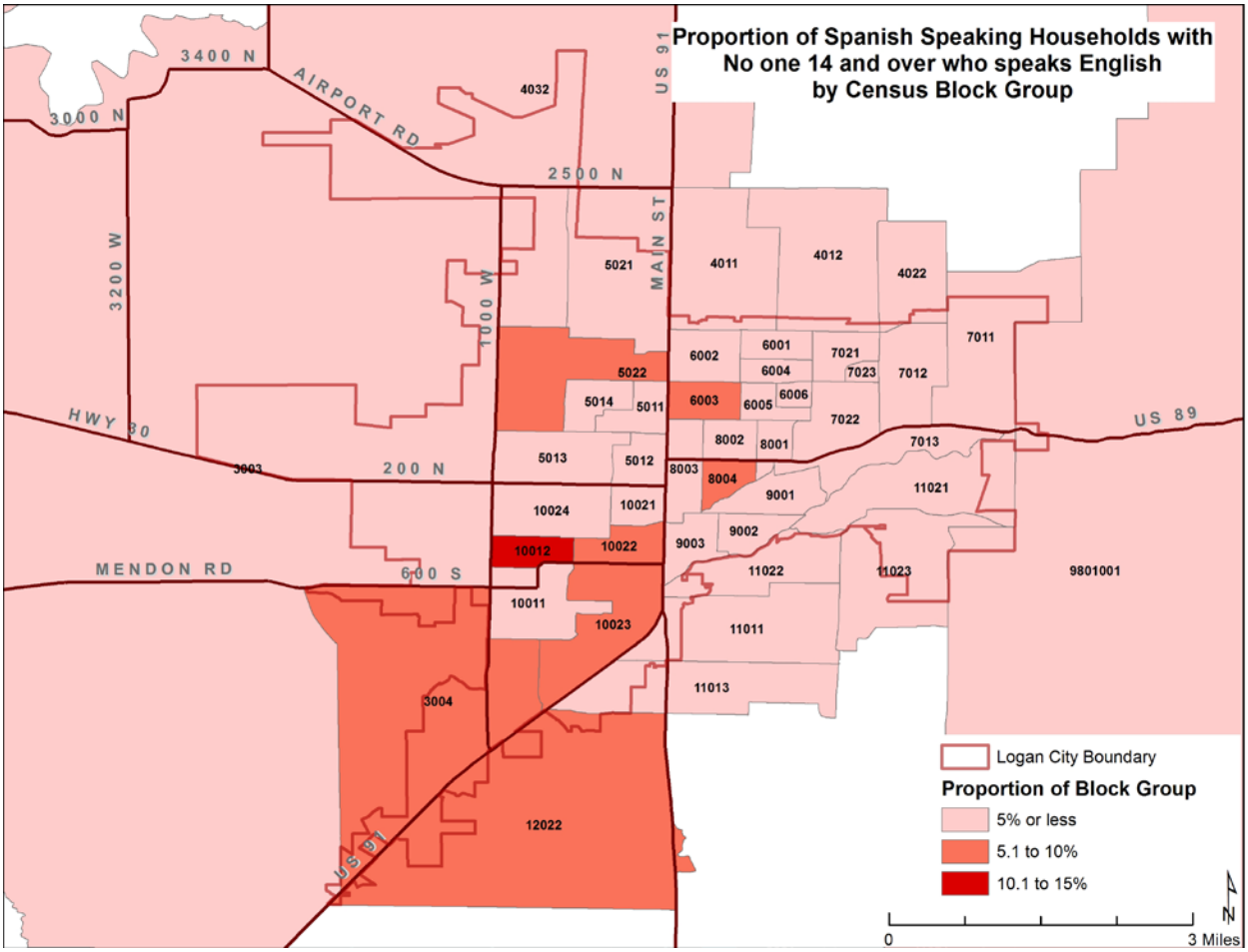
Map I-2. Concentration of Households where Spanish is Spoken by Census Block Group, Logan City 2010



Source: 2010 Census

When linguistic isolation is mapped (Map I-3), we see that about one-fifth of all Logan City Census Block Groups have proportions 5% or higher of Spanish Speaking households where no one age 14 or older speaks English. Only one block group has more than 10% of households that are linguistically isolated (10012). This same block group meets the high concentration of Latino individual definition noted above, but as described below has numerous protective factors as well (e.g., lower poverty rates, higher proportion of single-family housing units, etc.).

Map I-3. Proportion of Spanish Speaking Households with No One 14 and Over who Speaks English by Census Block Group, Logan City 2010



Income and Poverty. Logan City has experienced modest growth in median household income since 2000 (see table I-3 below). However, when compared to the same 2014 estimates for Cache County ($50,367), and for the larger State of Utah ($59,846), it is evident that Logan City has a troublingly lower median household income with a slower growth rate than Cache County and Utah as a whole.

Table I-3 Median Household Income, Logan City 2000 and 2014

Median Household Income	1990	2000	2014	Growth Rate (1990 to 2014)
Logan City	$21,312	$30,778	$35,770	40.4%
Cache County	$26,949	$39,730	$50,367	46.5%
State of Utah	$29,470	$45,726	$59,846	50.8%

Source: 1990, 2000 Census and 2014 ACS 5-Year Estimates

Table I-4 below details the change in poverty rates between 2000 and 2014 for Logan City by age categories and race/ethnicity categories. There has been significant growth

in poverty rates for all age categories since 2000 with the exception of individuals who are age 65 or older. Most notably there has been a 44.7% increase in child poverty since 2000 (in the context of a 23.5% growth rate among the population under 18 years old). Additionally, according to 2014 estimates, more than one-fourth of Logan City's adult population aged 18 to 64 lives in poverty. Some of these estimates can be attributed to the sizable college student population living in Logan City. As can be seen in Map I-4 below, there is a significant poverty concentration in the Census Block Groups encompassing and directly surrounding Utah State University. There are also pockets of more highly concentrated poverty in the East core of Logan City (Adams Neighborhood) and the South West quadrant (Woodruff Neighborhood).

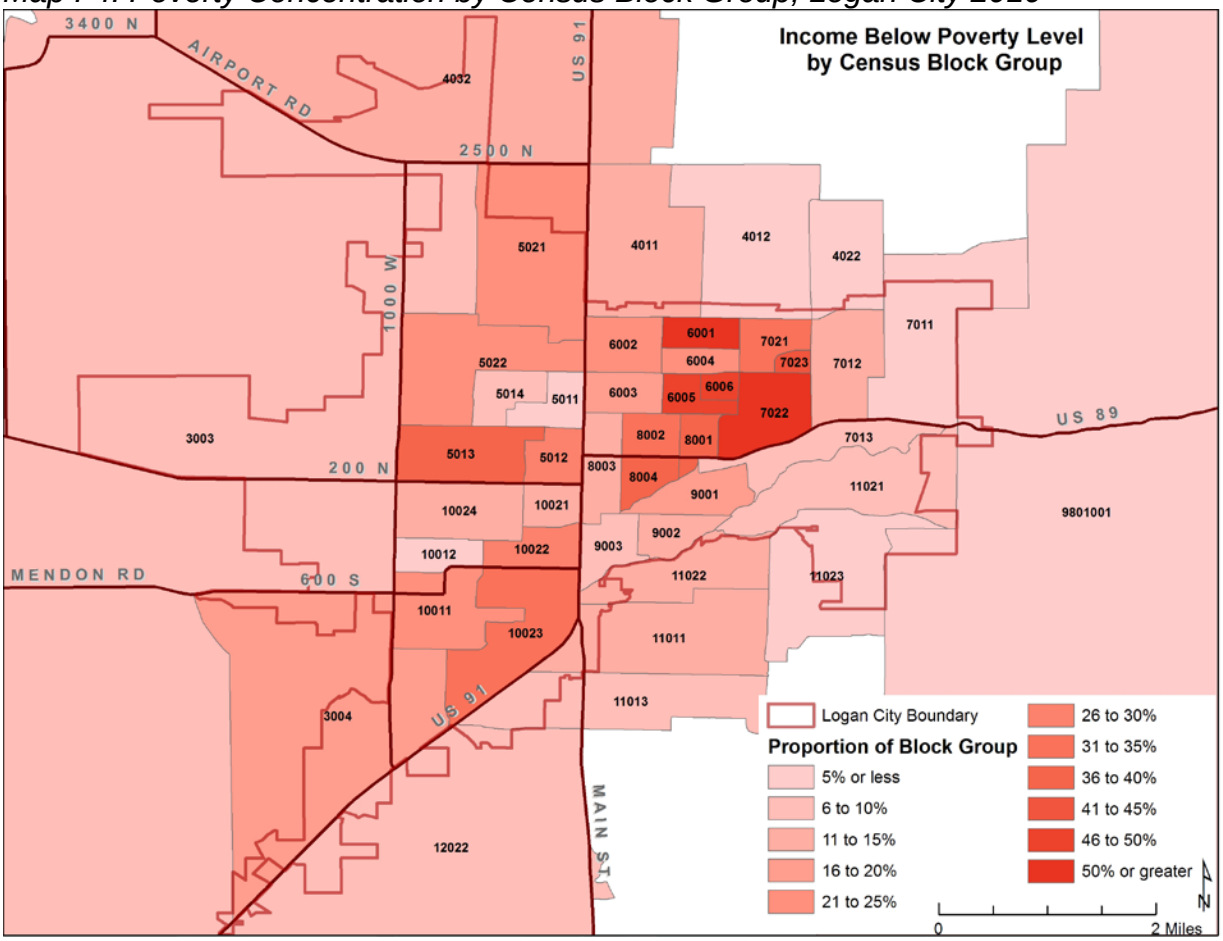
Table I-4 Poverty Status by Age Group, Logan City 1990, 2000 and 2014

	1990		2000		2014		Growth Rate
	N	%	N	%	N	%	
Population Under 18 Years of Age	9,125		9,831		11924		23.5%
Living in Poverty	1,715	18.80%	1,581	16.10%	3080	25.8%	**44.3%**
Not Living in Poverty	7,410	81.20%	8,250	83.90%	8,844	74.2%	(16.2%)
Population Age 18 to 64	19,834		28,138		30148		34.2%
Living in Poverty	4,915	24.80%	7,480	26.60%	8722	28.9%	**43.6%**
Not Living in Poverty	14,919	75.20%	20,658	73.40%	21426	71.1%	(30.4%)
Population Age 65 and Over	2,667		2,679		3086		13.6%
Living In Poverty	217	8.10%	171	6.40%	212	6.9%	(-2.4%)
Not Living In Poverty	2,450	91.90%	2,508	93.60%	2874	93.1%	**14.8%**
Race/Ethnicity							
White Alone	29019		36479		38562		24.7%
Living in Poverty	23212	80.0%	7779	21.3%	10366	26.9%	(-123.9%)
Not Living in Poverty	5807	20.0%	28700	78.7%	28196	73.1%	**79.4%**
Black or African American Alone	212		221		612		65.4%
Living in Poverty	82	38.7%	76	34.4%	133	21.7%	(38.3%)
Not Living in Poverty		130	61.3%	145 65.6%	479	78.3%	**72.9%**
American Indian and Alaska Native Alone	340		359		336		-1.2%
Living in Poverty	223	65.6%	254	70.8%	99	29.5%	(-125.3%)
Not Living in Poverty	117	34.4%	105	29.3%	237	70.5%	**50.6%**
Asian Alone Population	Not Available		1394		1600		12.9%
Living in Poverty			518	37.2%	709	44.3%	**26.9%**
Not Living in Poverty			876	62.8%	891	55.7%	(1.7%)
Native Hawaiian and Other Pacific Islander Alone	1569		37		297		-428.3%
Living in Poverty	935	59.6%	18	48.7%	0	0.0%	
Not Living in Poverty	634	40.4%	19	51.4%	297	100.0%	**-113.5%**
Some Other Race Alone	486		1590		2684		81.9%

Living in Poverty	327	67.3%	434	27.3%	372	13.9%	(12.1%)
Not Living in Poverty	159	40.4%	1156	72.7%	2312	86.1%	**93.1%**
Two or More Races	Not Available		568		1067		46.8%*
Living in Poverty			153	26.9%	335	31.4%	**54.3%***
Not Living in Poverty			415	73.1%	732	68.6%	(43.3%*)
Hispanic or Latino	925		3461		6918		86.6%
Living in Poverty	672	72.7%	890	25.7%	1865	27.0%	(64.0%)
Not Living in Poverty	253	27.4%	2571	74.3%	5053	73.0%	**95.0%**
White Alone, not Hispanic or Latino	Not Available		34825		34439		-1.1%*
Living in Poverty			7420	21.3%	9110.00	26.5%	**18.6%***
Not Living in Poverty			27405	78.7%	25329	73.6%	(-8.2%*)

*Growth rate calculated between 2000 and 2014
Source: 2000 Census and 2014 ACS 5-Year Estimates

Map I-4. Poverty Concentration by Census Block Group, Logan City 2010



Source: 2010 Census

Household Composition. The majority of households in Logan City are designated as family households (64.6%). There has been a modest growth rate in female-headed family households since 2000 (7.7%) to 2014 (8.7%), and among nonfamily households, there has been modest real growth among male householders. Refer to table I-5 for details.

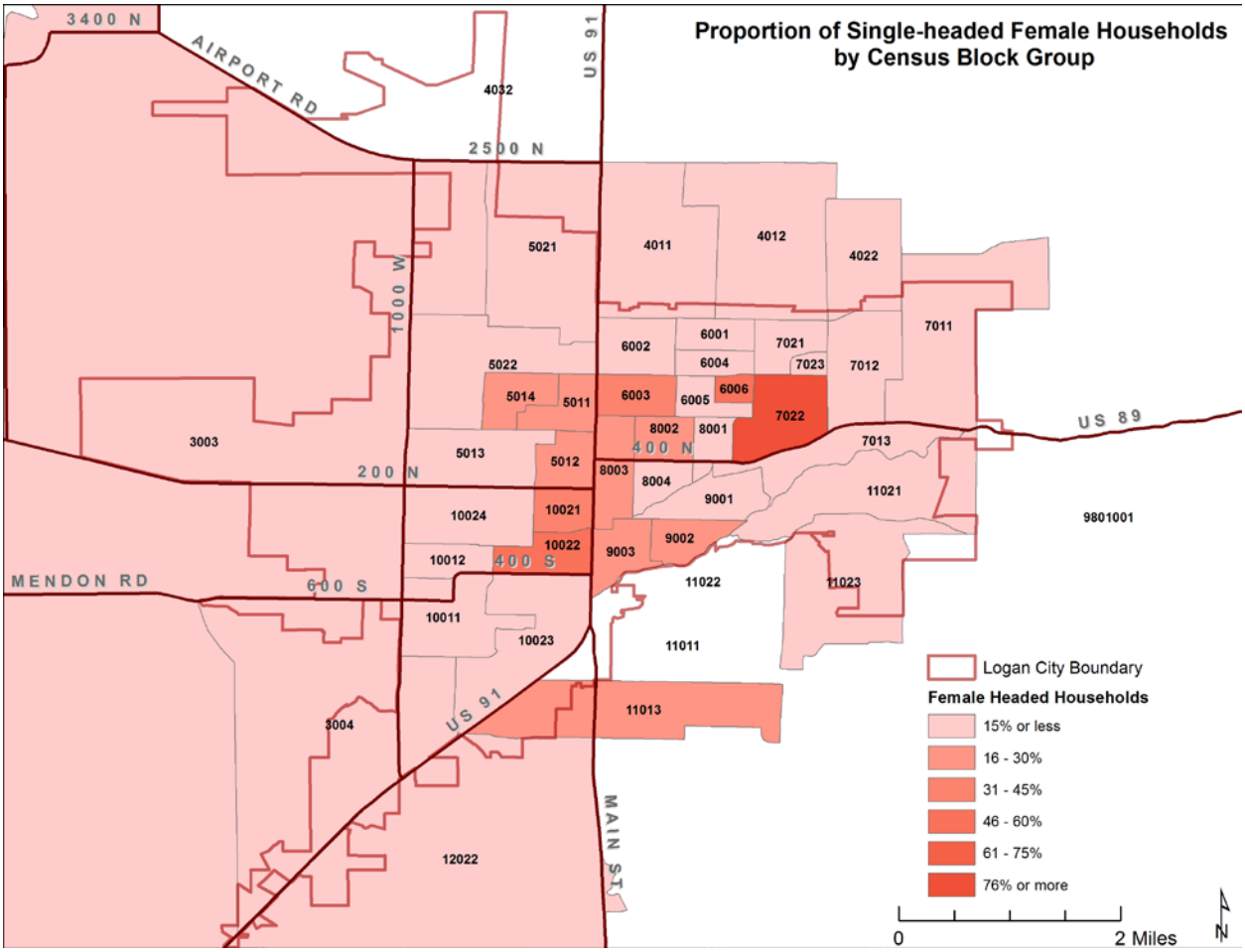
Table I-5. Household Composition for Logan City, 2000 and 2014

	2000		2014		Growth Rate
	N	%	N	%	
Households	13,902		15,839		12.23%
Family households:	9,174	66.0%	10,225	64.6%	10.28%
Married-couple family	7,663	55.1%	8,445	53.3%	(9.26%)
Other family:	1,511	10.9%	1,780	11.2%	**15.11%**
Male householder, no wife present	442	3.2%	410	2.6%	(-7.80%)
Female householder, no husband present	1,069	7.7%	1,370	8.7%	**21.97%**
Nonfamily households:	4,728	34.0%	5,614	35.4%	15.78%
Male householder	2,181	15.7%	2,660	16.8%	**18.01%**
Female householder	2,547	18.3%	2,954	18.7%	(13.78%)

Source: 2000 Census and 2014 ACS 5-Year Estimates

As can be seen in Map I-5 below, there are two census block groups with relatively higher proportions of single-headed female households. In general, there is spatial dispersion across block groups in terms of the concentration of female-headed households.

Map I-5. Female-Headed Household Concentration in Logan City, 2015



Employment and Workforce. There has not been any significant change in employment or unemployment rates since 2000 for Logan City's Population aged 16 years or older. More than two-thirds of Logan City's population aged 16 years or older is in the labor force, and 92% of those are employed according to 2014 estimates. When looking at growth rates in the context of overall population growth among individuals 16 years or older, it is evident that there has been more rapid growth in the armed forces, unemployed, and not in labor force categories even though they account for smaller proportions of the overall population. See table I-6 for details.

Table I-6. Employment Status for Population 16 Years and Over, Logan City 2000 and 2014

	2000		2014		Growth Rate
	N	%	N	%	
Population 16 years and over:	**33,757**		**37,946**		11.04%
In labor force:	23,693	70.2%	26,280	69.3%	(9.84%)
In Armed Forces	17	0.1%	34	0.1%	**50.00%**
Civilian:	23,676	70.1%	26,246	69.2%	(9.79%)
Employed	22,149	65.6%	24,373	64.2%	(9.12%)
Unemployed	1,527	4.5%	1,873	4.9%	**18.47%**
Not in labor force	10,064	29.8%	11,666	30.7%	**13.73%**

Source: 2000 Census and 2014 ACS 5-Year Estimates

Refer to table I-7 for a breakdown of occupational types for the employed civilian population 16 years and older in Logan City. There has been some growth in most categories with the exception of healthcare support occupations, farming, fishing and forestry occupations, construction, extraction, and maintenance occupations, and production occupations. The most sizable growth since 2000 has occurred in management, business, and financial operations occupations, personal care and service occupations, and sales and related occupations.

Table I-7. Occupation for Employed Civilian Population 16 Years and Over, Logan City 2000 and 2014

	2000		2014		Growth Rate
	N	%	N	%	
Employed civilian population 16 years and over:	**22,149**		**24,373**		**9.1%**
Management, business, and financial operations occupations:	1,747	7.9%	2,496	10.2%	**30.01%**
Professional and related occupations	5,493	24.8%	5,614	23.0%	(2.16%)
Healthcare support occupations	514	2.3%	509	2.1%	(-0.98%)
Protective service occupations	254	1.2%	275	1.1%	(7.64%)
Food preparation and serving related occupations	1,279	5.8%	1,468	6.0%	**12.87%**
Building and grounds cleaning and maintenance occupations	749	3.4%	922	3.8%	**18.76%**
Personal care and service occupations	807	3.6%	1,129	4.6%	**28.52%**
Sales and related occupations	1,998	9.0%	2,930	12.0%	**31.81%**
Office and administrative support occupations	3,617	16.3%	3,636	14.9%	(0.52%)
Farming, fishing, and forestry occupations	237	1.1%	171	0.7%	(-38.60%)
Construction, extraction, and maintenance occupations:	1,473	6.7%	1,344	5.5%	(-9.60%)
Production occupations	2,889	13.0%	2,655	10.9%	(-8.81%)
Transportation and material moving occupations	1,092	4.9%	1,224	5.0%	**10.78%**

Source: 2000 Census and 2014 ACS 5-Year Estimates

Educational Attainment. For Logan City's population aged 25 years or older, there has been modest growth in every educational attainment category but when viewed in the context of overall population growth rates, the most sizable growth has occurred among high school graduates, Bachelor's degrees, and Doctorate Degrees. According to 2014 estimates, just over one-third have earned a Bachelor's degree or more (36.9%). About 1 in 10 Logan residents have less than a High School diploma. Refer to table I-8 for details.

Table I-8. Educational Attainment for Population 25 Years and Over, Logan City 2000 and 2014

	2000		2014		Growth Rate
	N	%	N	%	
Population 25 years and over:	**18,147**		**22,200**		18.26%
Less Than High School	2,023	11.2%	2,235	10.1%	(9.49%)
High School Graduate (includes equivalency)	3,301	18.2%	4,205	18.9%	**21.50%**
Some college	6,560	36.2%	7,562	34.1%	(13.25%)
Bachelor's degree	4,034	22.2%	5,506	24.8%	**26.73%**
Master's degree	1,397	7.7%	1,650	7.4%	(15.33%)
Professional school degree	296	1.6%	248	1.1%	(-19.35%)
Doctorate degree	536	3.0%	794	3.6%	**32.49%**

Source: 2000 Census and 2014 ACS 5-Year Estimates

Disability. Persons with disabilities account for almost 10% of Logan City's population according to ACS 3-year estimates (2008-2010). Given that persons with disabilities are the category of protected persons most likely to encounter housing discrimination according to 2013 National estimates,[7] it is important to have a context for this population. According to the estimates presented in table I-9 below, more than half of individuals with disabilities have sensory or cognitive disabilities. Changes in the disability population cannot be calculated due to shifting definitions in disability types between decennial periods. In the Housing Market Analysis section below, housing options for persons with disabilities are discussed.

Table I-9. Number of Persons with Disabilities by Type of Disability, Logan City, 2010

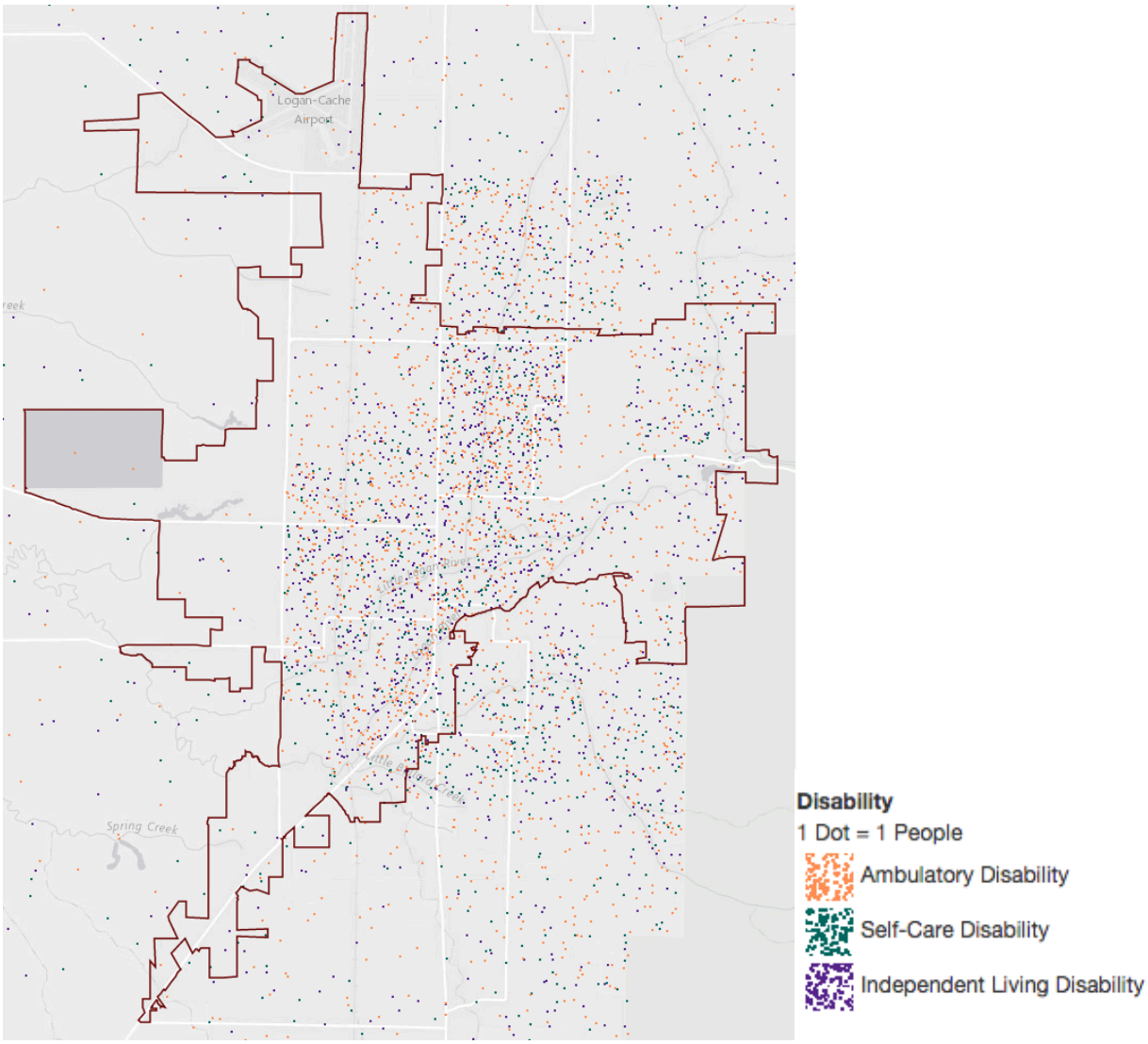
Type of Disability	2010	% of Logan City Population
Sensory Disability	1,416	2.9%
Ambulatory Disability	917	1.9%
Cognitive Disability	1,241	2.5%
Self-Care Disability	388	.01%
Independent-Living Disability	751	1.5%
Total	**4,713**	**9.63%**

Source: ACS 3-Year Estimates (2008-2010)

Map I-6 below depicts the spatial distribution of individuals with ambulatory, self-care, and independent living disabilities in Logan City. As can be seen in the map, individuals with disabilities (regardless of type) seem to be equally distributed across Logan City. There are fewer individuals with disabilities in the neighborhoods nearest the University, but this likely reflects the larger college student population residing in these areas.

Map I-6. Distribution of Persons with Disabilities in Logan City, 2010

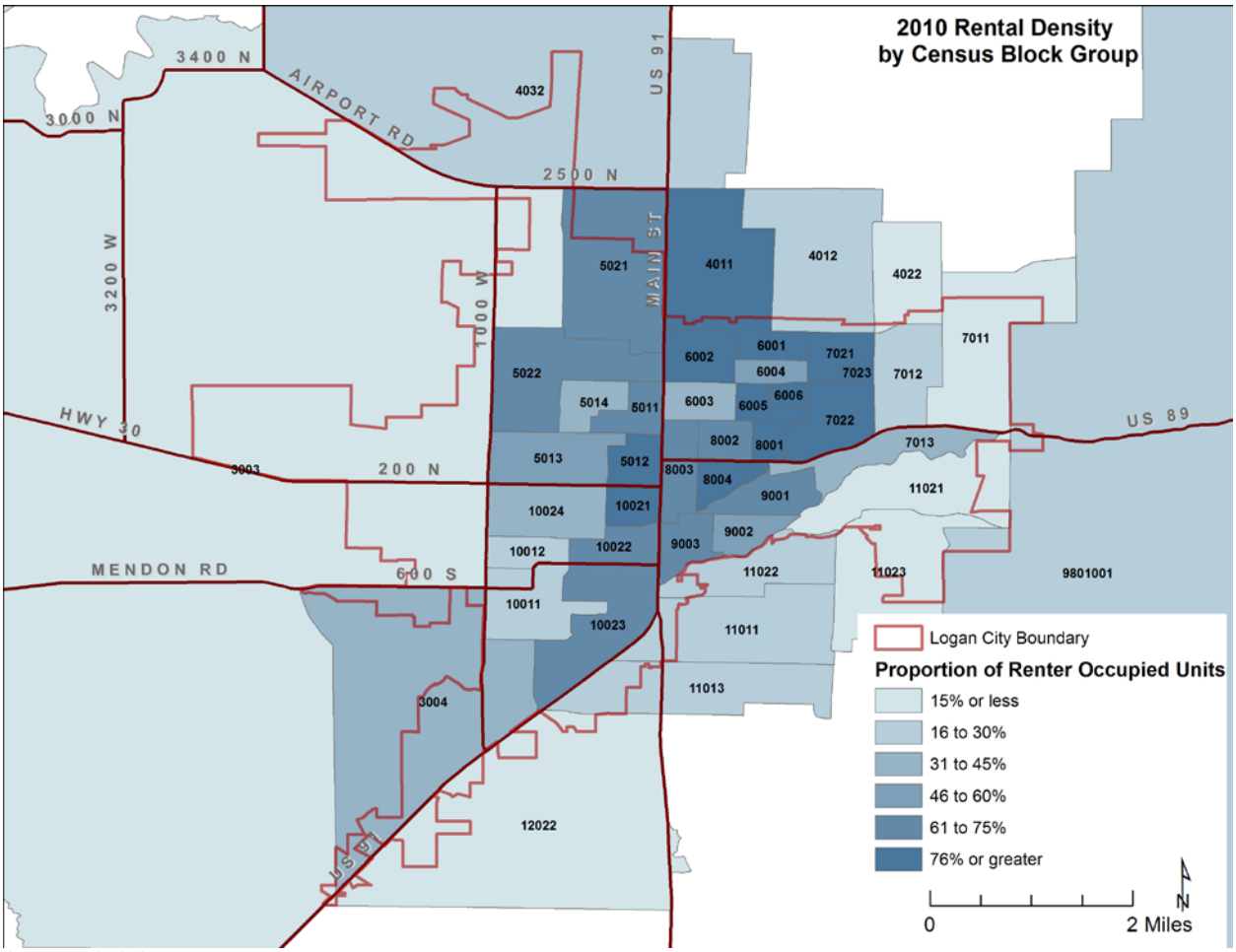
[7] See Fair Housing Trends Report, NFHA, 2014: http://www.nationalfairhousing.org/LinkClick.aspx?fileticket=MqO6AE6loGY%3D&tabid=3917&mid=5321



Housing Market Analysis

According to 2014 American Community Survey estimates, there are 16,865 housing units in Logan City. Logan City added 2,173 units to its inventory since 2000, reflecting a 12.7% increase in the city's housing stock. Currently, 42.3% of housing units are owner occupied (an increase of 8.8% since 2000) and 57.7% are renter occupied (an increase of 14.8% since 2000). See map I-7 and table I-10 below for a depiction of rental density by Census Block Group.

Map I-7. Rental Density by Census Block Group, Logan City 2010



Source: 2010 Census

Table I-10. Rental Density by Census Block Group

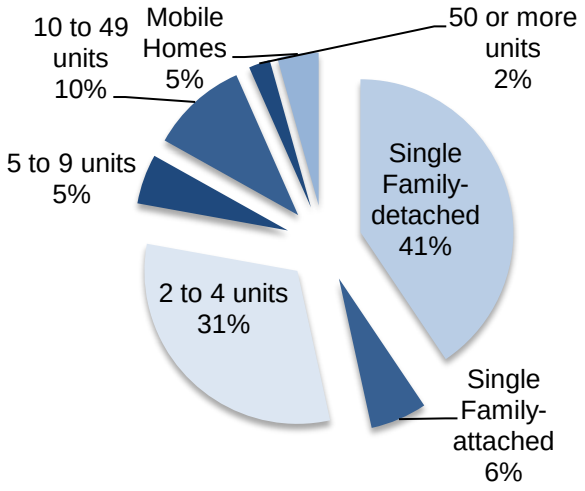
	2000			2010		
Block Group	**Total Units**	**Renter Occupied**	**Proportion of Block Group**	**Total Units**	**Renter Occupied**	**Proportion of Block Group**
3003	652	74	11.3%	490	69	14.1%
3004				903	375	41.5%
4011	358	232	64.8%	741	558	75.3%
4012	327	41	12.5%	405	70	17.3%
4022				447	54	12.1%
4032	591	81	13.7%	354	69	19.5%
5011				400	292	73.0%
5012				547	418	76.4%
5013				505	266	52.7%
5014				437	182	41.6%
5021				1121	823	73.4%
5022				728	532	73.1%
6001	579	370	63.9%	262	211	80.5%
6002	560	448	80.0%	656	553	84.3%
6003	238	77	32.4%	222	77	34.7%
6004	912	811	88.9%	323	175	54.2%
6005				414	341	82.4%

6006				324	319	98.5%
7011	507	30	5.9%	564	34	6.0%
7012	603	55	9.1%	542	117	21.6%
7013	234	89	38.0%	229	87	38.0%
7021	668	613	91.8%	74	74	100.0%
7022	118	117	99.2%	49	49	100.0%
7023				366	366	100.0%
8001	573	518	90.4%	573	526	91.8%
8002	475	326	68.6%	454	316	69.6%
8003	429	322	75.1%	404	296	73.3%
8004	556	419	75.4%	549	437	79.6%
9001	614	391	63.7%	653	428	65.5%
9002	326	136	41.7%	335	155	46.3%
9003	299	163	54.5%	313	189	60.4%
10011				477	110	23.1%
10012				362	96	26.5%
10021				297	227	76.4%
10022				290	212	73.1%
10023				740	462	62.4%
10024				370	161	43.5%
11011	977	210	21.5%	837	210	25.1%
11013				700	177	25.3%
11021	801	40	5.0%	476	21	4.4%
11022	373	59	15.8%	407	65	16.0%
11023				460	23	5.0%
12022				965	85	8.8%
9801001				34	6	17.6%

Source: 2000 and 2010 Census

Although there are currently only 41% single family-detached homes and 6% single family-attached homes in Logan City, these housing types have experienced the most significant growth since 2000 (20.5% and 37.6%, respectively). See figure I-1. below for a breakdown of housing units by type in Logan City.

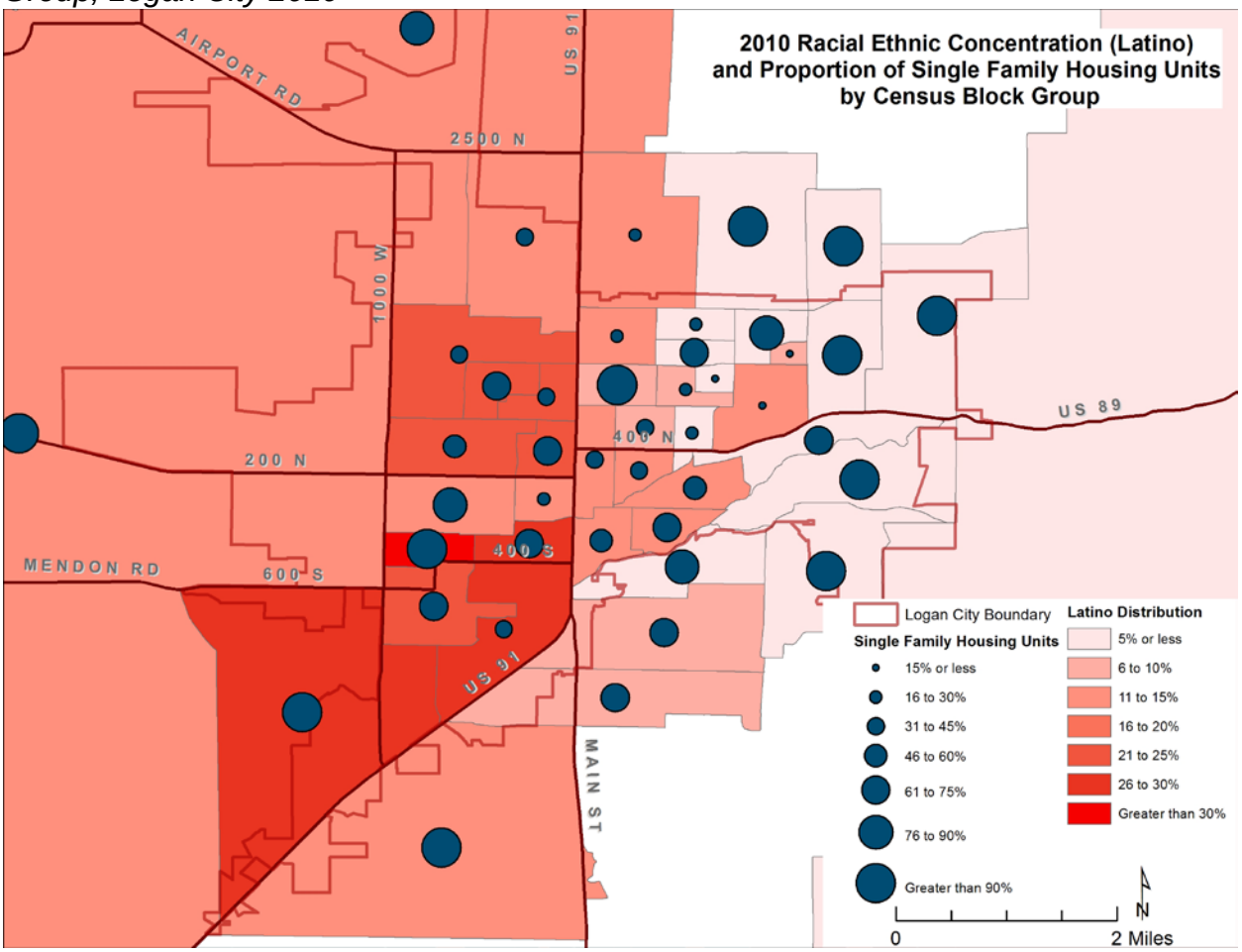
Figure I-1. Housing Units by Type, Logan City 2014



Source: 2014 ACS 5-Year Estimates

Map I-8 below depicts single-family housing density in the context of Latino concentration. Larger blue circles indicate higher densities of single-family housing, while darker red shaded block groups indicate higher concentrations of Latinos. In general, the map depicts good variation in single-family housing density across the city, however, the Northwest quadrant of the city has visibly lower density of single-family housing units with moderately higher concentrations of Latino individuals by block group.

Map I-8. Single-Family Housing Density and Latino Concentration by Census Block Group, Logan City 2010



Household Type. According to 2014 ACS estimates, 45% of housing units in Logan City have 2 bedrooms or less, 28% have 3 bedrooms, and 26% have 4 bedrooms or more. As can be seen in Table I-11 and Map I-9 below, there are between block group differences in the proportions of number of bedrooms per housing unit. Only about 1 in 5 block groups in Logan City have more than half of available housing units with 4 or more bedrooms. These block groups are primarily on the far east side of Logan City. Of the 4 block groups designated as moderately or highly Latino concentrated, 3 have more than 1/3 of its housing units with 4 or more bedrooms (10012, 10022, 3003). Only one Latino concentrated block group (10023) seems to have the majority of its housing units with only 2 or 3 bedrooms. These data suggest that the majority of our Latino

concentrated neighborhoods have access to a wide variation of housing types in terms of bedroom number.

Map I-9. Bedroom-Number per Housing Unit and Latino Concentration by Census Block Group, Logan City 2014

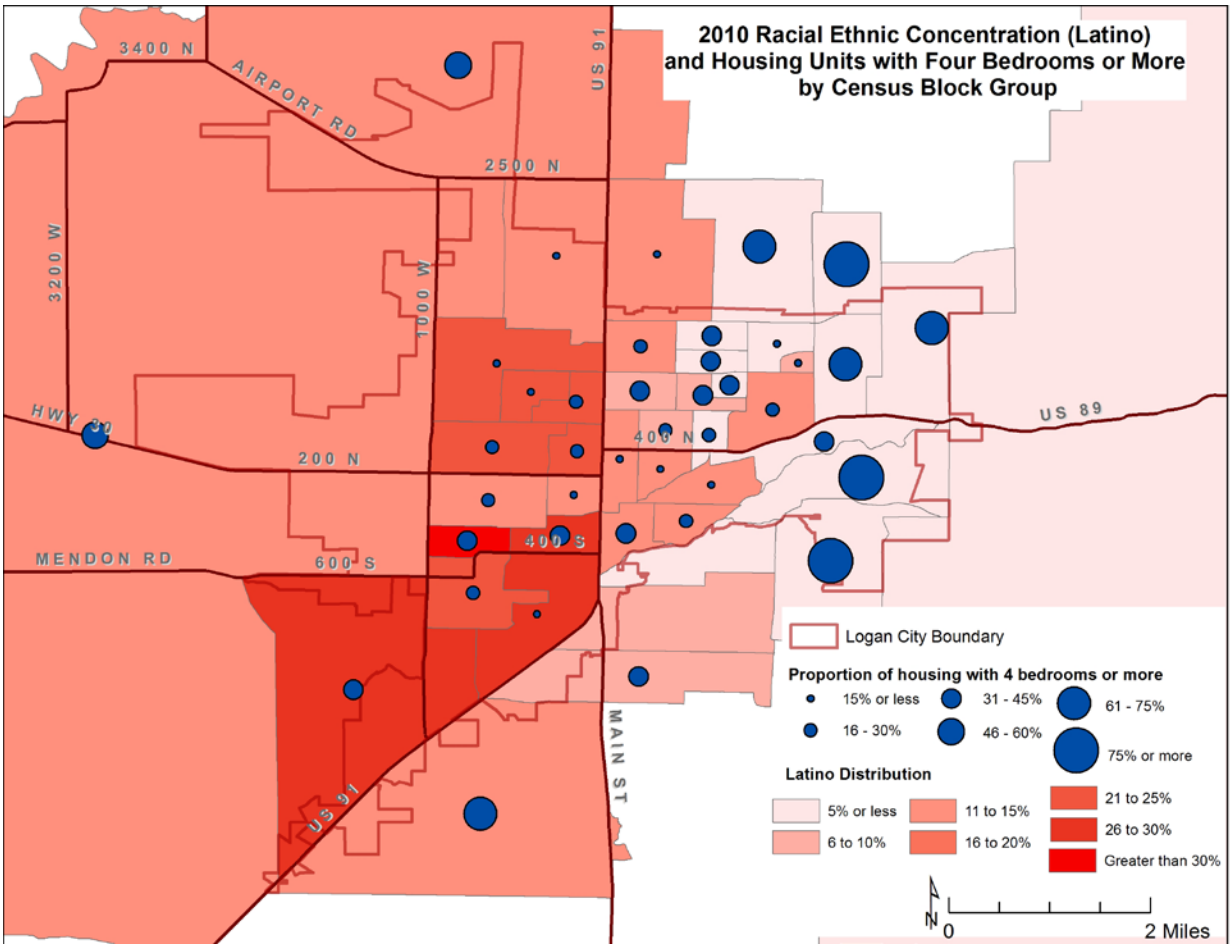


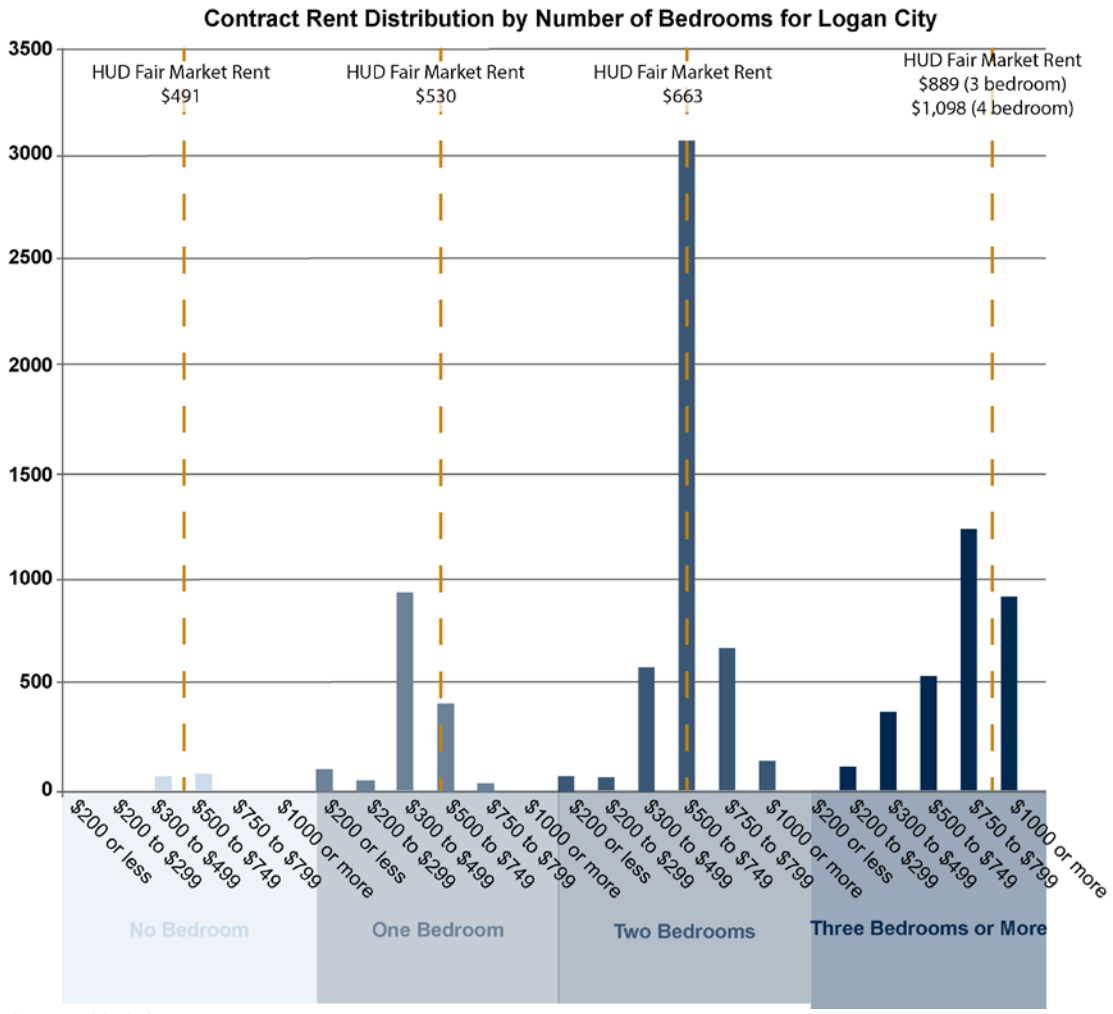
Table I-11. Number of Bedrooms per Housing Unit by Census Block Group

CBG	% no bedroom	% 1 bedroom	% 2 bedroom	% 3 bedroom	% 4 bedroom	% 5 or more

						bedroom
7021	0%	0%	100%	0%	0%	0%
7023	0%	5%	89%	6%	0%	0%
5022	0%	2%	47%	48%	2%	1%
5021	0%	1%	38%	54%	6%	2%
8004	4%	31%	38%	19%	3%	5%
5014	0%	1%	52%	38%	4%	5%
10021	6%	25%	38%	22%	7%	3%
10023	0%	11%	49%	30%	10%	1%
8003	2%	24%	29%	34%	7%	3%
4011	1%	6%	49%	30%	6%	7%
9001	0%	3%	56%	27%	14%	0%
9801001	12%	20%	40%	12%	14%	2%
6002	7%	26%	44%	6%	11%	7%
10024	0%	22%	28%	32%	15%	4%
5012	0%	11%	56%	14%	17%	2%
7022	0%	0%	52%	26%	0%	22%
8001	1%	33%	32%	11%	11%	11%
5013	0%	10%	45%	21%	13%	11%
10011	0%	4%	13%	58%	9%	16%
9002	0%	22%	16%	36%	14%	12%
5011	0%	12%	50%	10%	18%	10%
8002	0%	6%	40%	23%	30%	0%
6006	4%	17%	41%	7%	7%	23%
11013	0%	0%	54%	13%	20%	13%
6005	5%	8%	40%	13%	20%	14%
9003	0%	15%	28%	23%	30%	5%
10012	0%	0%	5%	59%	26%	9%
6001	0%	0%	38%	27%	36%	0%
3004	0%	0%	12%	52%	25%	11%
6004	0%	0%	12%	51%	22%	14%
7013	0%	17%	11%	29%	17%	26%
10022	0%	21%	30%	5%	33%	10%
6003	0%	6%	18%	32%	42%	2%
3003	2%	3%	22%	26%	29%	18%
4032	0%	0%	22%	27%	37%	14%
12022	0%	0%	5%	24%	36%	35%
4012	0%	4%	11%	14%	27%	44%
7011	0%	2%	6%	20%	27%	45%
7012	0%	0%	0%	25%	37%	38%
11023	0%	1%	5%	16%	29%	49%
11021	0%	0%	2%	20%	28%	50%
4022	0%	1%	4%	16%	39%	39%

Rentals. According to 2014 ACS estimates, the median gross rent in Logan City is currently $645, a 146 dollar increase since 2000. Refer to figure I-2 for a breakdown of rental costs by bedroom size of unit. HUD indicates that fair market rent (FMR) for 2015 in Cache County, UT is $490 for a one-bedroom, $649 for a two-bedroom, and $934 for a three-bedroom unit.[8] As can be observed in the figure below, the majority of rental units in each bedroom category fall at or below the FMR for Cache County. However, there are still numerous units that exceed FMR within the city, and map I-9 below shows the spatial patterning of contract rent rates across the city.

Figure I-2. Contract Rent by Number of Bedrooms for Logan City



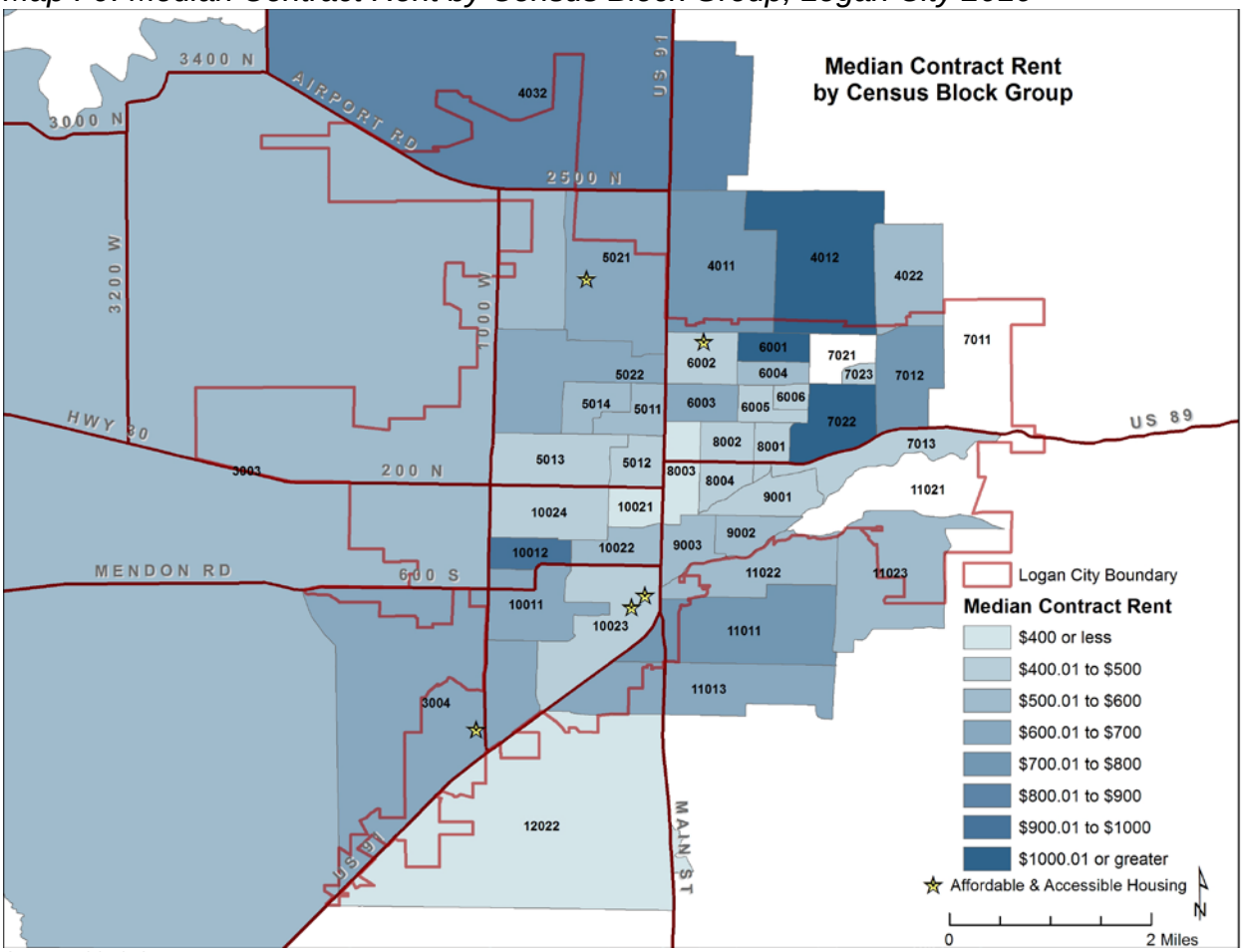
Source: 2010 Census

As can be seen in the map below, the core of Logan City (both East and West of Main Street) has some of the lowest median contract rent rates. Census block groups on the

[8] See HUD's FY2015 FMR and IL Summary System: https://www.huduser.gov/portal/datasets/fmr/fmr_il_history/data_summary.odn

South end of the city and the North East end of the city have moderately higher median contract rent rates. The extent to which these spatial patterns are a result of bedroom size in the available rental units in unclear.

Map I-9. Median Contract Rent by Census Block Group, Logan City 2010



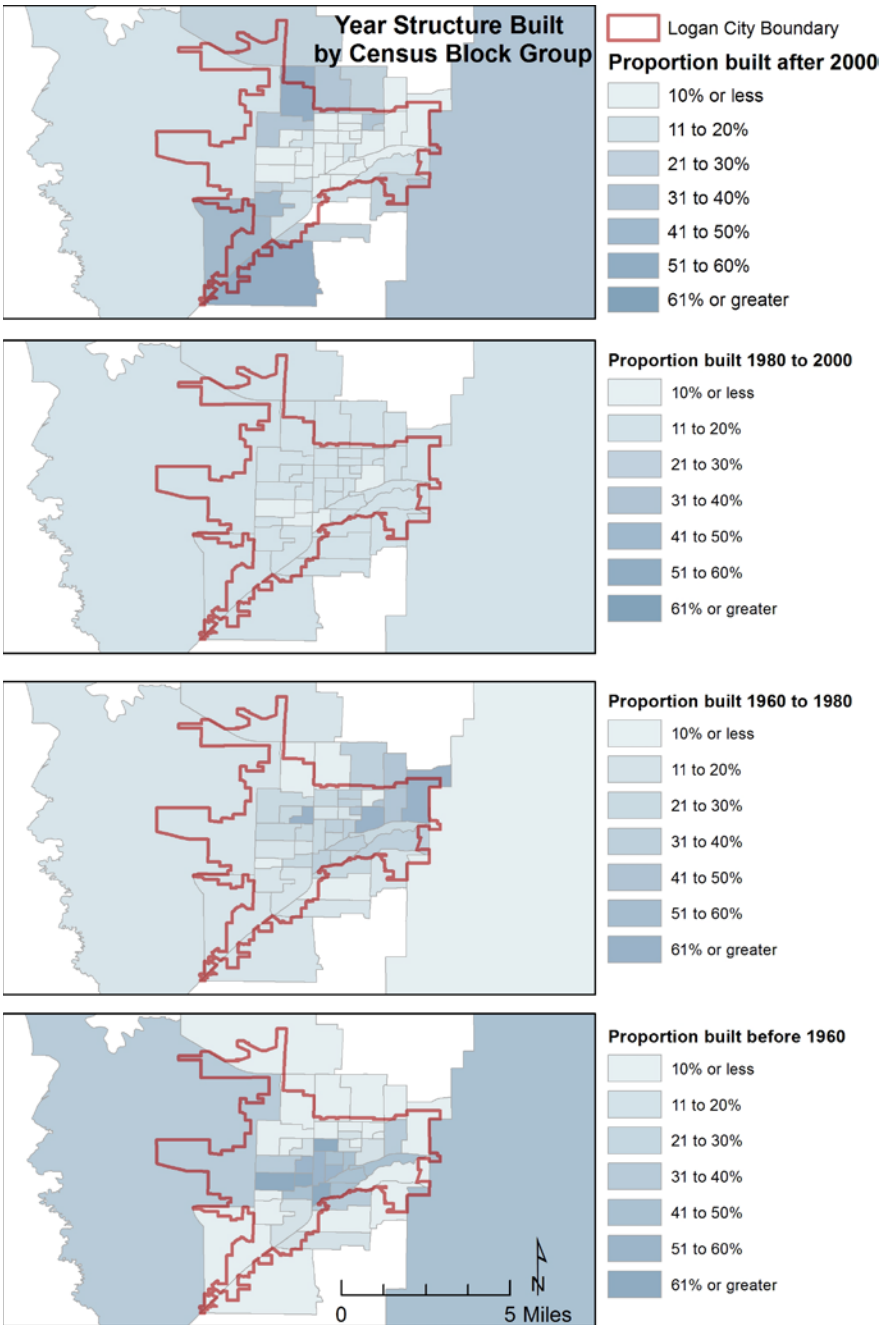
Source: 2010 Census

Housing for Persons with Disabilities. Options for Independence (OPTIONS) is a nonresidential Independent Living Center in Logan City where people with disabilities can learn skills to gain more control and independence over their lives. Caseworkers at OPTIONS often advocate for clients in housing-related issues, and assist clients in finding affordable and accessible housing. According to information from OPTIONS, there are currently five apartment complexes that offer affordable *and* accessible housing units. However, caseworkers at OPTIONS report that waiting lists for these units are very long and there is a need for additional affordable and accessible housing options within Logan City. Yellow stars in map I-6 above denote the locations of the aforementioned affordable and accessible complexes. Four out of the five complexes are located in the west half of Logan City. Data gathered from apartment complex owners or managers indicate that there 422 total units available between these five complexes. However, only 40 total units are fully ADA accessible (i.e. ground level, accessible kitchens and bathrooms, etc.). Despite the numerous block groups with

affordable median contract rent rates in the core of Logan City, there are virtually no affordable and accessible housing units on record. Given the sizable population of persons with disabilities in Logan City, this presents a serious concern for a protected class of persons in being able to access affordable housing in a variety of neighborhoods.

Age of Housing Stock. Map X below depicts the concentration of housing stock built prior to 1960, between 1960 and 19880, between 1980 and 2000, and after 2000. As can be seen in the map, the core of Logan City was built prior to 1960. Additionally, development after 2000 appears to have occurred disproportionately in the South West and North West quadrants of the City (due largely to undeveloped parts of Logan City).

Map I-10. Housing Vintage Concentration in Logan City, 2010

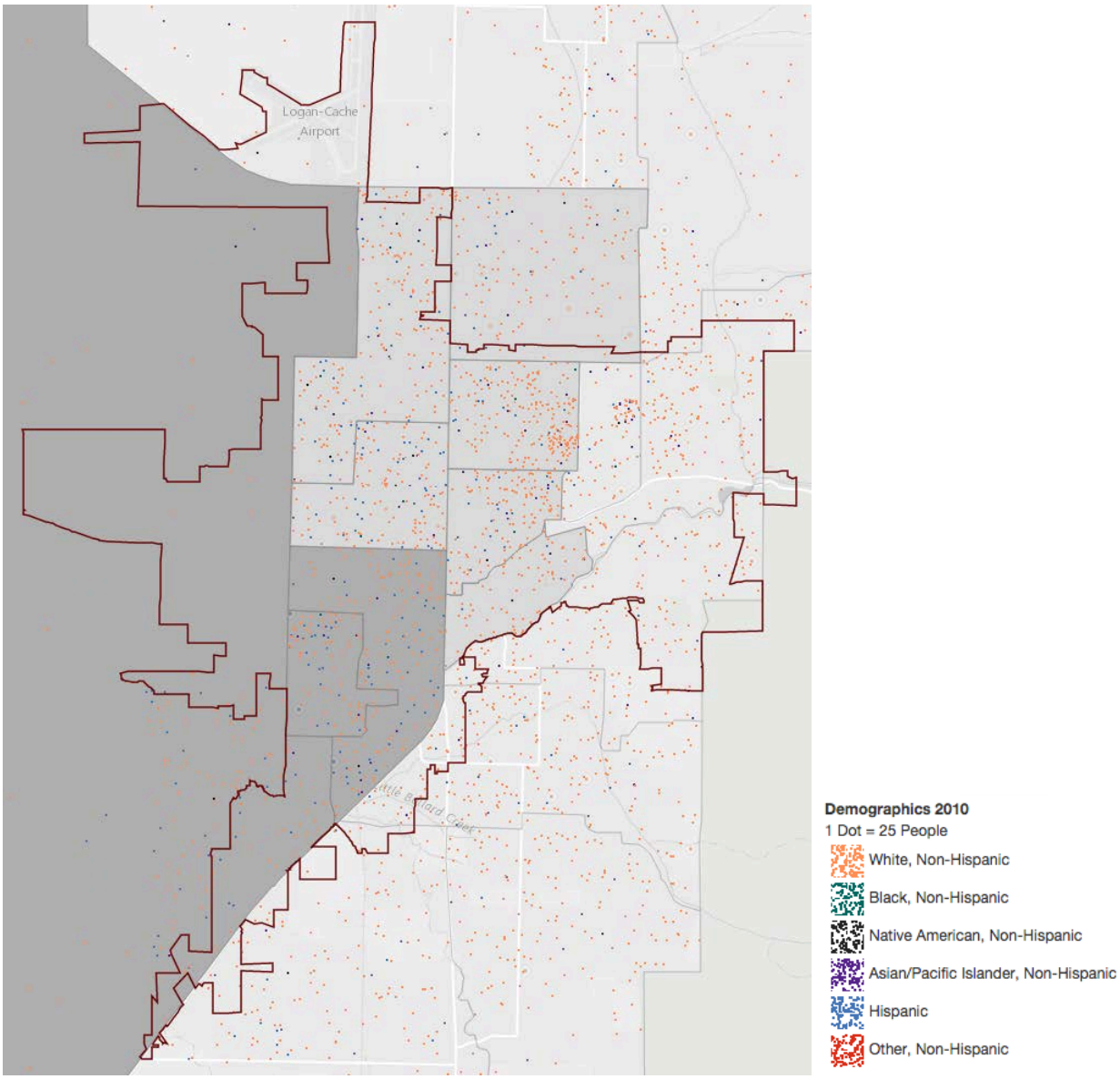


Housing Choice Vouchers and Housing Programs. According to the Logan Housing Plan[9], Logan City offers a large number of homes and condominiums in it's existing housing inventory, even for households with only 80% AMI or less. However, very little new homes that are built in Logan City are considered affordable for households with 80% AMI or less. Logan City does not have a Public Housing Authority; however, Bear River Association of Governments' (BRAG) Housing and Human Services administers

[9] For details see:
http://www.loganutah.org/CD/Planning%20and%20Zoning/pdf/Logan%20Housing%20Plan%202011.pdf

the housing choice voucher (HVC) program. This program provides 566 vouchers for individuals in BRAG's jurisdiction with annual HUD funding of approximately 2.7 million dollars. The most recent figures indicate that Logan City Housing Authority currently has 444 vouchers from HUD. As of February 2016, there were 668 families on the housing choice voucher program waiting list, and 70% of those applicants are from Cache County. The average housing assistance payment for all families receiving assistance is currently $343.00. Per HUDs regulations, 75% of housing participants are extremely low-income—for a family of 4 in Cache County this means an annual income of $24,250. Of HCV program participating families, 23% are single-parent households, 67% have a family member with a disability, and 14% have an elderly household member (62 years or older). The average income of HCV program participants is $96,00 for those receiving social security benefits and $13,000 for those who are employed. Map I-11 below shows that there are a higher proportion of vouchers (denoted by darker shaded gray areas) in the South West quadrant of Logan City. However, the data presented above demonstrates that low rent prices are not concentrated to any particular area. It is likely that fewer housing choice vouchers are being used on the East portion of Logan City due to the rental units in that area being dominated by students. Further participants in the HCV program may wish live in areas that do not have high student populations.

Map I-11. Housing Choice Voucher Use by Race/Ethnicity, 2010

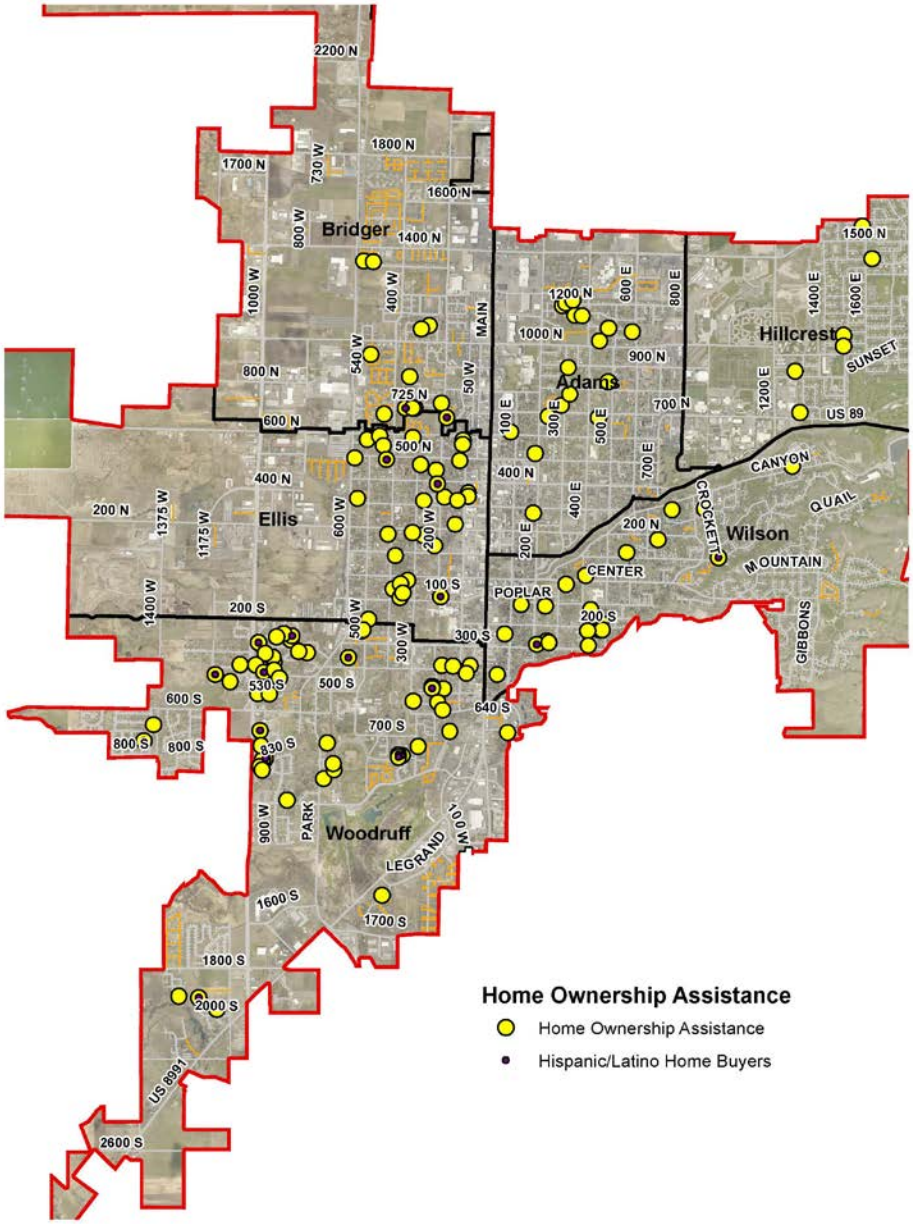


Note: Gradation in gray indicates density of housing voucher use. As can be seen in the map, the West portion of Logan city has the highest density of voucher use, the central portion less, and the East portion the least.

The Welcome Home down payment subsidy assistance program provides homebuyers who meet income eligibility criteria with down payment assistance ranging in the amounts of $5,000 to 12,000. Data spanning the years of 2003 and 2015 indicate that approximately 1.23 million dollars have been spent on this program, and 193 families have been served. On average the annual income of these families is $31,626 and the average family size is 3.4. Almost 15% of participating families are single-headed households, and approximately 16.4% of participating households are Latino. The average vintage for homes that are being bought under this program is 1961, and the average sale price over these years of program implementation is $129,578. Map I-12 below depicts the geographic distribution of homes purchased through this program and indicates which of these homes were purchased by Latino families. As can be seen in

the map below, program participants are purchasing homes in a wide variety of neighborhoods, however, there tends to be more program participants purchasing homes that are West of Main Street. Additionally there are virtually no program participants purchasing homes in the far East portion of the Wilson neighborhood (Cliffside). Furthermore, it appears that only 2 Latino families purchased homes under this program that were East of Main Street, with the majority of Latino program participants purchasing homes in the South West quadrant of Logan City.

Map I-12. Welcome Home Program Participants, 2003-2014

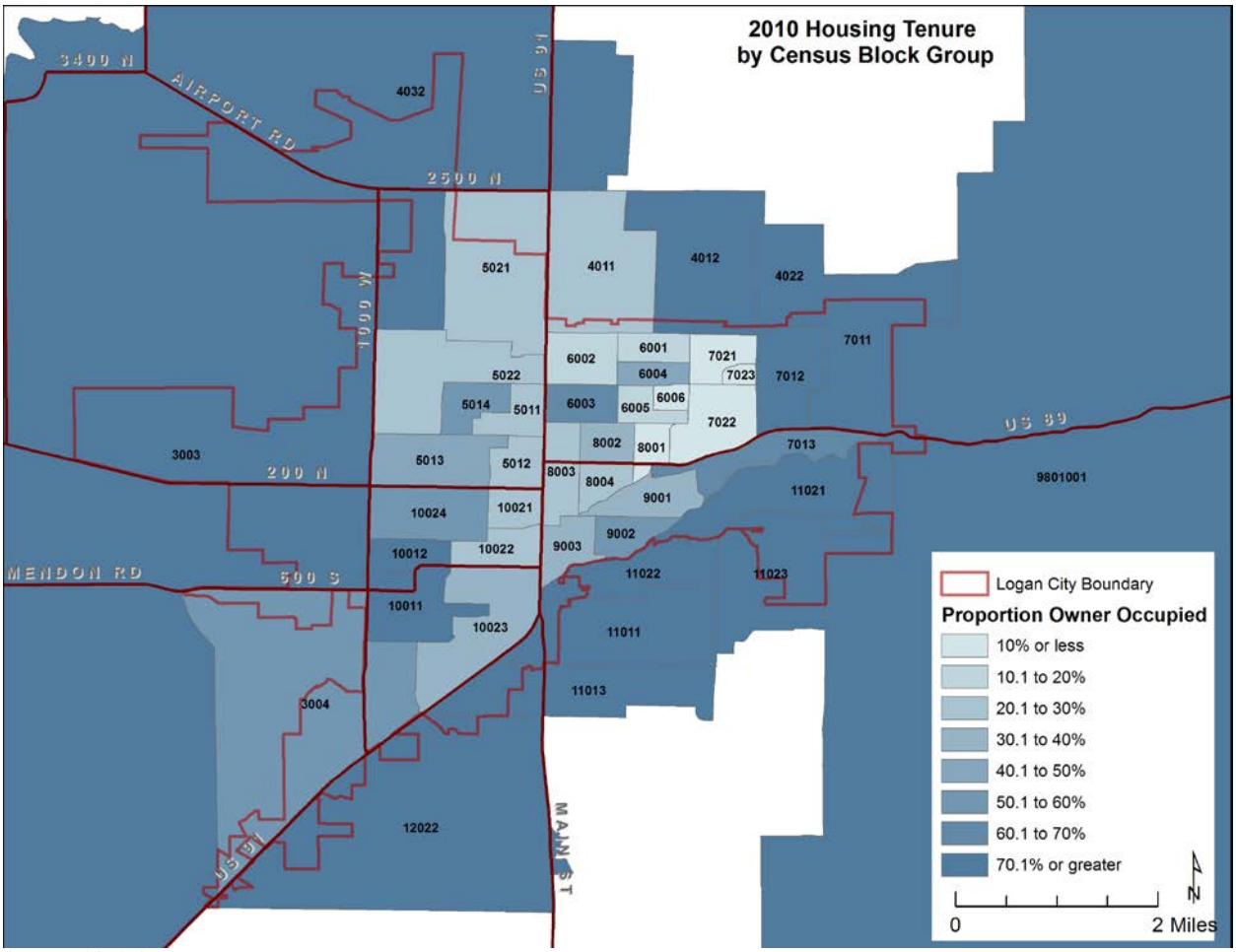


Logan City operates a Housing Rehabilitation Assistance (HRA) program that serves households with annual incomes that are 80% or less than Logan's Annual Median

Income. The HRA program is intended to assist with addressing life-safety issues (e.g., roofs, electrical upgrades, ADA barriers, plumbing, etc.) and requires a 30% match for an improvement project's approval (either through funds from BRAG or sweat equity matches). Administrative data spanning the years of 2012 to 2016 indicate that 24 households have participated in the HRA program, with an average assistance amount of $5,536. Three of the 24 families (12.5%) were Latino, and more than half (58%) were female singled-headed households and the average household size was 3.5. Finally, 3 participating families (12.5%) had a household member with a disability. These data indicate that while single-headed households are accessing the program at high rates, there are fewer Latino families and families with disabilities accessing the HRA program.

Homeownership. As noted above, Logan City's homeownership rate is 42.3% according to 2014 estimates. When compared to Cache County (65.3%) and the State of Utah (69.7%), the homeownership rate in Logan City is significantly lower. As displayed in Map I-13 below, Census block groups located in the South, West, and East boundaries of the city have the highest homeownership rates.

Map I-13. Homeownership Density by Census Block Group, Logan City, 2010



Source: 2010 Census

Housing Problems. In 2013, HUD released a new query tool that allows Comprehensive Housing Affordability Strategy (CHAS) data to be accessed for varying geographic scales. In 2015, HUD released new CHAS data based on the 2008-2012 ACS.[10] These data provide indicators of housing problems, cost burden, and number of low-income households in jurisdictions. According to the 2008-2012 ACS estimates, there were 16,110 housing units in Logan City. Refer to table I-12 for a summary of income distribution, housing problems, severe housing problems and housing cost burden for renters versus owners in Logan City. As can be seen in the table below, renters have disproportionately lower incomes, and almost double the housing problems and severe housing problems when compared to homeowners. These numbers are generally worse for Logan City compared to Cache County. Additionally, renters in Logan City have higher cost burdens when compared to homeowners. Given that nearly 6 out of 10 housing units in Logan City are renter occupied, these data indicate a significant amount of stress that households experience in Logan City.

[10] See https://www.huduser.gov/portal/datasets/cp.html

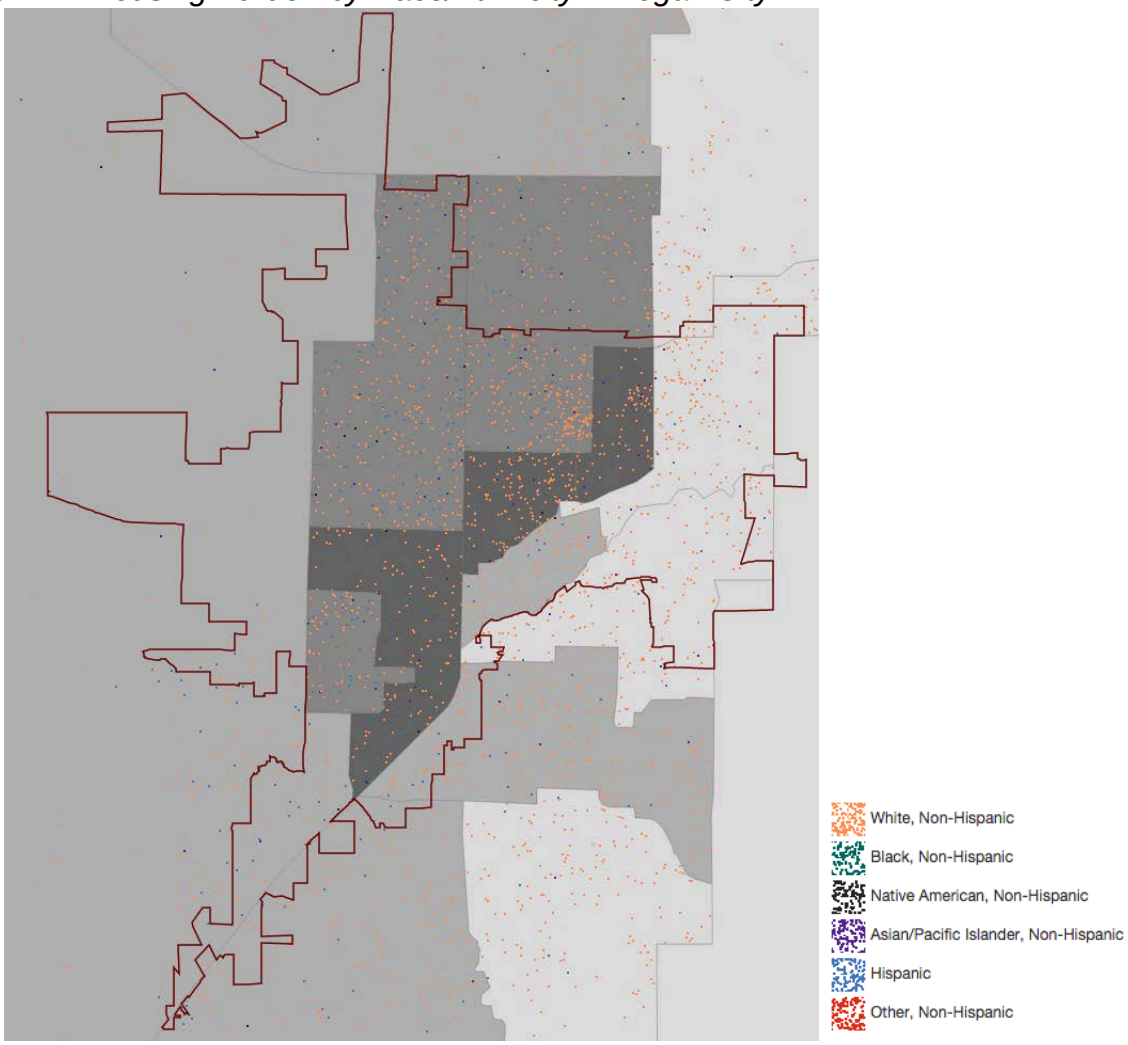
Table I-12. Comparison of Income, Housing Problems, and Cost Burden for Renters and Owners in Logan City and Cache County, 2008-2012

	Logan City			Cache County		
	% Within Owners	% Within Renters	% For Total	% Within Owners	% Within Renters	% For Total
Unit Totals	6455	9655	16110	22605	12630	35235
Income Distribution Overview						
Household Income <= 30% HAMFI	5.03%	20.71%	14.43%	3.54%	19.04%	9.10%
Household Income >30% to <=50% HAMFI	9.22%	24.96%	18.65%	6.24%	23.71%	12.50%
Household Income >50% to <=80% HAMFI	17.82%	23.20%	21.04%	16.32%	23.32%	18.83%
Household Income >80% to <=100% HAMFI	14.10%	13.93%	14.00%	12.30%	14.21%	12.98%
Household Income >100% HAMFI	53.91%	17.19%	31.91%	61.60%	19.75%	46.60%
Housing Problems Overview 1						
Household has 1 of 4 Housing Problems	29.12%	49.20%	41.15%	25.35%	47.31%	33.22%
Household has none of 4 Housing Problems	70.26%	49.25%	57.67%	74.12%	51.35%	65.96%
Severe Housing Problems Overview 2						
Household has 1 of 4 Severe Housing Problems	13.01%	26.15%	20.89%	9.58%	26.29%	15.57%
Household has none of 4 Severe Housing Problems	86.37%	72.35%	77.96%	89.87%	72.37%	83.60%
Housing Cost Burden Overview 3						
Cost Burden <=30%	71.65%	53.91%	61.02%	75.51%	56.85%	68.82%
Cost Burden >30% to <=50%	16.73%	25.06%	21.73%	16.46%	23.08%	18.83%
Cost Burden >50%	11.08%	19.42%	16.08%	7.52%	18.61%	11.49%
Cost Burden not available	0.62%	1.66%	1.24%	0.53%	1.43%	0.85%

Notes: [a]HAMF indicates HUD Adjusted Median Family Incomes; [b]The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%; [c]The four severe housing problems are: incomplete kitchen facilities; incomplete plumbing facilities; more than 1 person per room; and cost burden greater than 50%; [d]Cost burden is the ratio of housing costs to household income. For renters- housing cost is gross rent (contract rent plus utilities). For owners housing cost is “select monthly owner costs” which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

Data from the AFFH mapping tool indicate that housing burdens are higher in parts of the South West quadrants of Logan City, but that they also span to parts of the Adam's neighborhood, showing that higher concentrations of Latinos are not disproportionately affected by housing burdens compared to less segregated areas of the city. Refer to Map I-14. below for a visual depiction of racial/ethnic concentration and housing burden. The darker gray scale areas have higher housing burdens.

Map I-14. Housing Burden by Race/Ethnicity in Logan City



Synthesis of Community and Housing Profile

Refugees

As the community profile data indicated, the refugee population in Logan City has been growing. Cache Refugee and Immigrant Connection (CRIC) works with refugees on various issues including troubleshooting and navigating social service systems. Representatives from CRIC do not report that refugees are facing trouble in the housing

or rental market in Logan City. A large statewide refugee needs assessment was conducted in 2013-2014, and results from interviews with refugees indicated that fair housing issues were a problem in Salt Lake City, but refugees who were interviewed in Logan City did not indicate the same.[11] Nonetheless, it is highly likely that refugees face significant language barriers in locating and securing housing. Currently CRIC offers assistance for refugee individuals in navigating these complex systems (including connecting with BRAG and the Department of Workforce Services and securing translation services over the phone). Additionally the English Language Learning Center is an excellent resource in Logan City. The most recent figures estimate that the ELC teaches 77 ELL classes annually and serves 924 students in these classes. The overwhelming majority of students come from Central America/Caribbean; however, students from 56 countries are served annually at the ELC.[12]

Persons with Disabilities

The data presented above show that persons with disabilities face an extreme shortage of affordable and accessible housing options. Although persons with disabilities appear to be distributed widely across Logan City's neighborhoods, it is likely that low-income persons with disabilities are faced with difficulties in obtaining accessible housing that is also affordable. Although two-thirds of all housing choice voucher participants have a household member with a disability, that only amounts to 379 households. Data indicate that almost 10% of Logan City's population has some form of disability (N=4,713). Data from 5-year ACS estimates (2009-2013) indicate that 1,230 individuals with disabilities had income to poverty ratios less than 1.5—meaning an annual income of $36,375 for a family of 4. Given the overall shortage of affordable *and* accessible housing for persons with disabilities combined with the proportion of low-income persons with disabilities in Logan City, it appears there is a serious problem related to fair housing access.

Concentrations of Poverty and Racial/Ethnic Minorities

As was noted in the demographic profile above, there are higher rates of poverty in the South West and East (Central) quadrants of Logan City. It is important to examine the opportunity structures of these neighborhoods (e.g., quality of schools, transportation, access to jobs, etc.) as well as the extent to which concentrations of poverty and race/ethnicity correlates with other demographics such as disability status, limited English proficiency, family structure, rental tenure, homeownership, housing burdens, use of housing programs, etc.

School Quality. In terms of public school quality, there are a few indicators that suggest the school catchment area or neighborhood one lives in affects the quality of education one is able to access in Logan City. There are 6 elementary schools in Logan City (3 West of Main Street and 3 East of Main Street). All schools are considered Title I schools (meaning at least 40% of enrolled students are income-eligible for Title I services). On average across the 6 schools, 67% of enrolled students meet the

[11] http://socialwork.usu.edu/tci/files/uploads/Utah_Refugee_Needs_Assessment_--_Final_Report.pdf
[12] http://www.elc-cv.org/index.php/about-us/current-statistics

economic disadvantage criteria (range = 44% to 77%). Other shared demographics are evident in Logan City schools. For example, between 11% and 24% of students are considered English Language Learners, and between 19% and 45% of students are ethnic minority students. In terms of school performance, all schools earn either a B or C grade from Utah State Office of Education, meaning they fall between the 45th and 61st percentile in terms of language arts, math, science, and reading scores relative to the State of Utah. Further details can be seen in Table I-13 below. As can be seen in the data below, the quality and demographics of each of Logan's public elementary schools do not vary in any extreme ways. Further, each of the 6 schools has an after school program in partnership with Logan City, and 2 of the 6 schools (Bridger and Hillcrest) offer dual language immersion programs. Finally, it is important to note that Logan City School District offers open enrollment across its 6 elementary schools. If a parent would like for their child to attend the Spanish immersion program and Bridger Elementary, for example, they can apply for the school choice program.

Table I-13. Logan City Public School Demographic and Performance Data, 2015

Elementary	Student Enrollment	Ethnic Minority	ELL	Econ Disadv	Special Ed	Language Arts	Math	Science	School Grade	Overall Performance Percentile
Bridger	608	43%	24%	76%	20%	27%	45%	35%	C	45%
Ellis	360	38%	22%	77%	23%	61%	65%	56%	B	63%
Woodruff	661	45%	24%	71%	21%	42%	51%	50%	B	59%
Hillcrest	481	32%	19%	58%	12%	47%	55%	43%	C	49%
Adams	368	37%	18%	77%	16%	41%	55%	50%	C	50%
Wilson	489	19%	11%	44%	15%	46%	64%	54%	B	61%

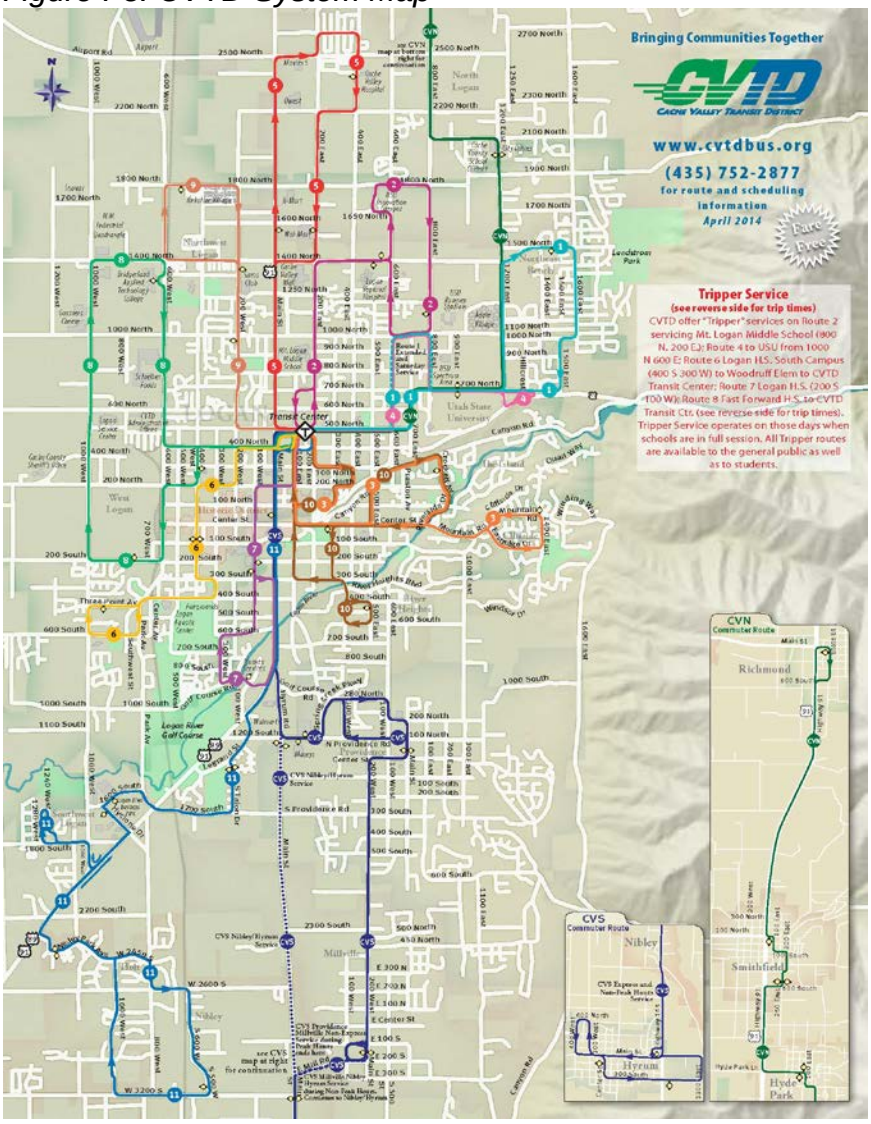
Family Structure. As was noted above, there is generally spatial dispersion across block groups in terms of the concentration of female-headed households. It does not appear that concentrations of racial/ethnic groups are correlated with concentrations of female-headed households.

Housing Programs. As is described above in the community profile, the South West quadrant has higher proportions of Latinos, LEP persons, and housing burdens. Although the Welcome Home down payment assistance program and Housing Rehabilitation Assistance program are effectively serving single-headed households across the city, there could be greater outreach to LEP populations, particularly for the HRA program. Additionally, there should be some investigation as to why Welcome Home program participants are not tending to buy homes in East Logan.

Public Transportation. Cache Valley Transit District (CVTD) provides Logan City with an entirely free public transit system, which spans the entire Cache Valley and offers residents a free, accessible, and comprehensive transit option. The entire system map can be seen in figure X below. In addition, CVTD works with BRAG's Mobility

Program to ensure that bus stops are accessible. Furthermore CVTD offers a Call-A-Ride service that provides a paratransit bus service to assist persons with disabilities who are unable to use CVTD standard buses or arrive at CVTD bus stops.[13] A notable gap in CVTD's services is that they are not open on Sundays. This may create a burden for individuals without transportation to attend their scheduled employment on Sundays. Nonetheless, the comprehensive access to free transit services available in all neighborhoods in Logan City effectively decreases impediments to fair housing choice.

Figure I-3. CVTD System Map



Summary

The community and housing profile data presented above point to numerous impediments to fair housing choice. In particular, these data illuminate issues of

[13] https://www.cvtdbus.org/MIRideInformation/accessibility.php

racial/ethnic concentration and spatial concentrations of housing program participants (including down payment assistance, housing rehabilitation, and housing choice vouchers). Although there does not appear to be disparate opportunity structures associated with living in neighborhoods that have higher concentrations of Latino individuals (measured by school quality, transit access, etc.), it is concerning that housing program participants tend to generally reside West of Main Street. This observation will lead to numerous recommendations further in the report.

SECTION II. PUBLIC PARTICIPATION

Fair Housing Snap Shot Study

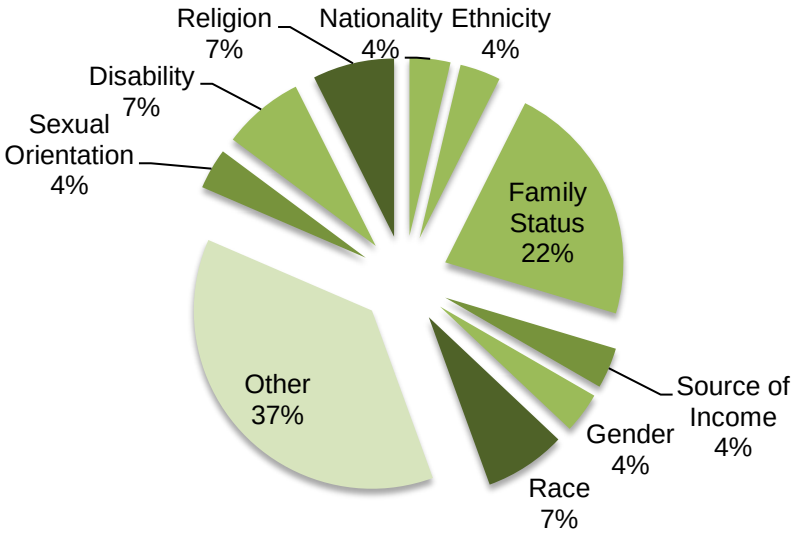
Background

The section below describes the analysis of an already existing data source that has yet to be used for Logan City purposes, the “Fair Housing Snap Shot” data. USU faculty and student researchers collected 237 surveys from a random Logan neighborhood sample (representation from most block groups in Logan) that queried the public on their knowledge of and attitudes regarding the Fair Housing Law. Additionally, the survey probed the public’s experience of housing discrimination. As was noted in the 2013 AI for Logan City, the evidence for housing discrimination is hard to come by and the only available source of evidence as of yet has been complaints made to BRAG. However, with this existing data, responses were coded at the block group-level and maps were produced that convey spatial patterning of knowledge, attitudes, and experience related to fair housing. Spatial analyses offer insight as to whether housing discrimination is a neighborhood-dependent (i.e., block-group level) phenomenon.

Findings

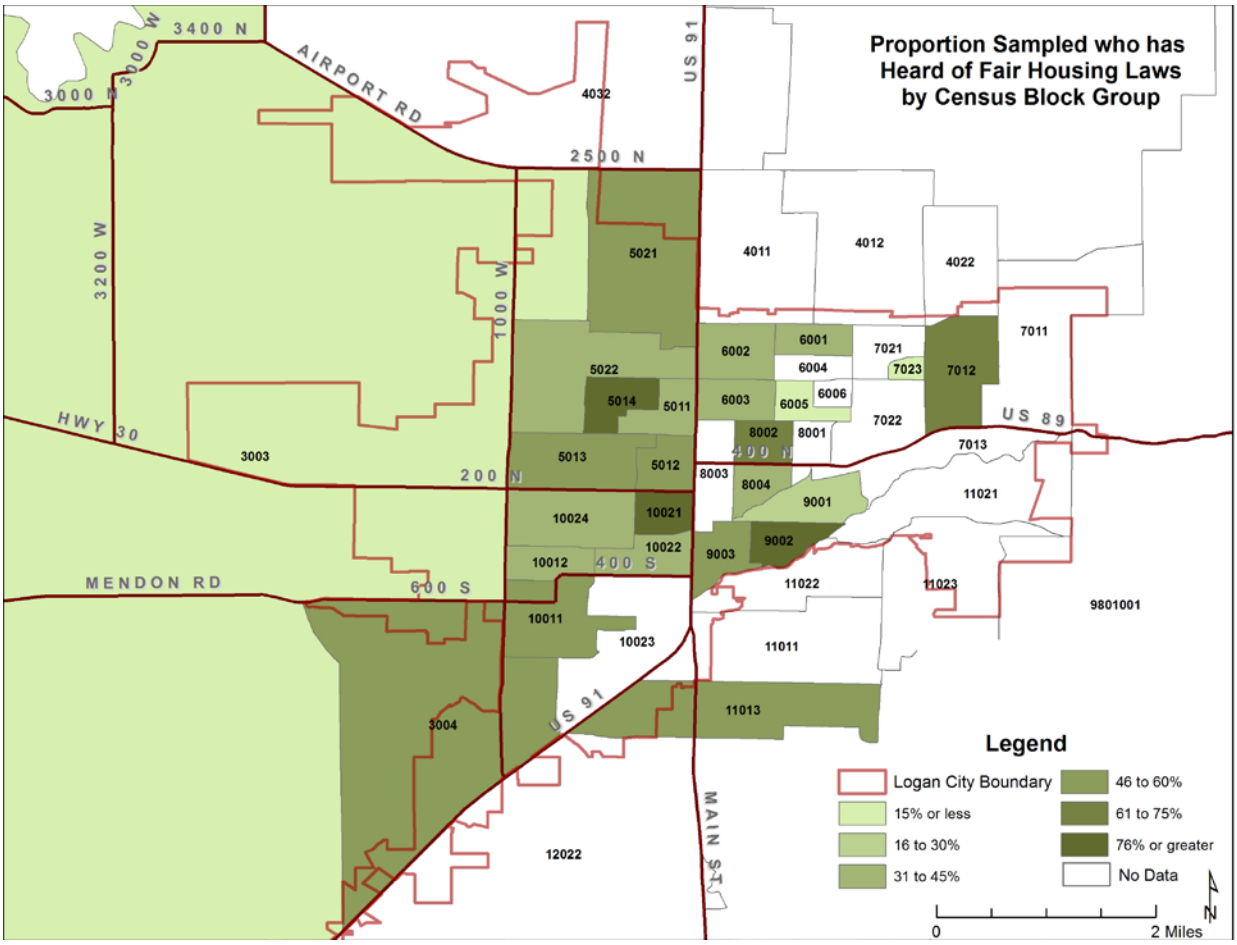
Experience of Housing Discrimination. To assess the extent to which Logan City residents have experienced housing discrimination, two survey questions were used. The first was a close-ended question asking respondents if they had ever experienced housing discrimination, and the second was an open ended question asking respondents if they could describe the circumstances surrounding their experience of housing discrimination. Results indicated that approximately 12% (n=27) of the sampled Logan City residents self-reported having experienced some form of housing discrimination. See figure II-1 for a breakdown of types of discrimination that Logan City residents reported. All types of housing discrimination fit within the state and federally protected class categories with the exception of the “other category.” Individuals who fell into this category tended to describe experiences that related to no smoking, no drinking, or no pets policies by landlords. Although this is a legal restriction to make on the part of landlords and rental companies, many individuals reported this restriction as being a proxy for religion. The most cited type of housing discrimination that coincided with a protected category was based on family status (22%). Individuals who indicated they experienced housing discrimination as a result of their family status described instances where landlords found out how many children they had or that they were single mothers with young children and decided not to rent to them. For example, one woman said, “we were looking at renting a home. When the owner found out we had 6 children, he told us it had been rented and was no longer available. It sat vacant for 6 months after that.”

Figure II-1. Type of Housing Discrimination Experienced by Logan City Residents



In order to ascertain if housing discrimination occurs more or less frequently in certain geographic areas of Logan City, responses were mapped. As can be seen in map II-1 below, higher proportions of the community sample who had experienced housing discrimination tend to live West of Main street and in parts of the Adams neighborhood. It is important to note one weakness of these data, however. The cell counts per block group were relatively small (between 10-15 respondents per block group). The proportional amounts of individuals reporting housing discrimination from any one block group, then are small (between 1 and 3 individuals per block group). However, given the random sampling procedures used, one can extrapolate findings to the larger block group.

Map II-1. Proportion of Sample who Experienced Housing Discrimination by Block Group

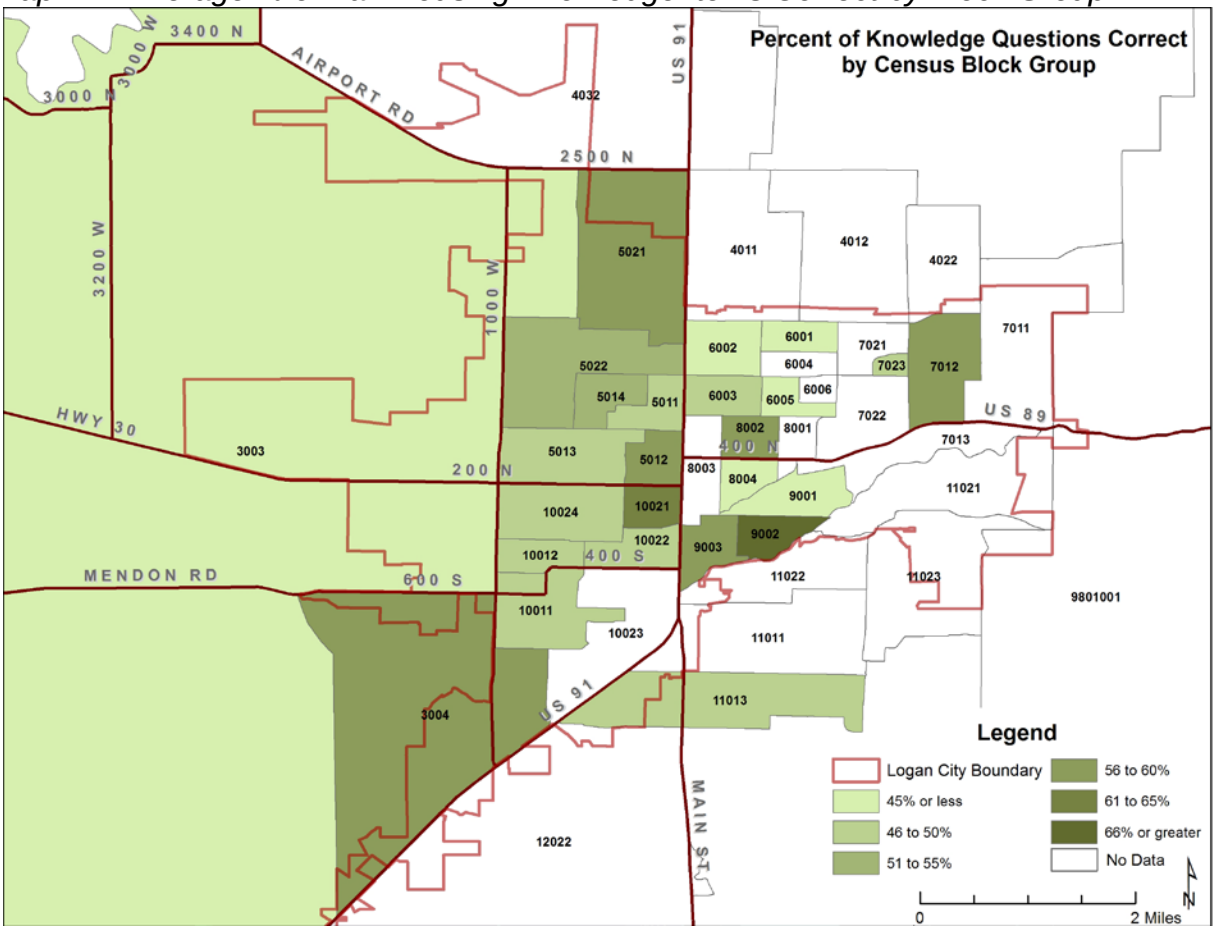


Knowledge and Awareness of Fair Housing Law. In terms of knowledge and awareness, these data indicate that Logan City residents are generally unaware of the Fair Housing Law and the protections they are ensured under the law. To measure how much residents knew about the Fair Housing Law, residents answered 8 true and false questions. Each item had a right or wrong answer, according to the Fair Housing Law (see table II-1 for a full description of each item). Based on responses to these 8 true and false questions related to Fair Housing Law, Logan City residents answered an average of 53% correctly.

Table II-1. Frequencies of Participant Responses to True/False Fair Housing Knowledge Statements

True or False Knowledge Statement (Correct Answer)	True	False
A person can be prevented from renting an apartment if he/she is thought to be too old by the building owner. (True)	11.9%	88.1%
A person that is legally blind cannot rent an apartment alone. (False)	15.0%	85.0%
Single people with children can be restricted from renting in an adults-only building. (False)	71.6%	28.4%
Single people with children can be charged a higher rental deposit than applicants without children. (False)	27.7%	72.8%
People with service animals can be charged a pet deposit. (False)	55.1%	44.9%
A person's country of origin can be used to determine the building where he/she may rent. (False)	7.9%	92.1%
It is within the law to restrict certain hours for the use of the pool by children. (False)	83.7%	16.3%
Landlords have the right to refuse to rent to people of the same gender living together. (False)	16.3%	83.7%

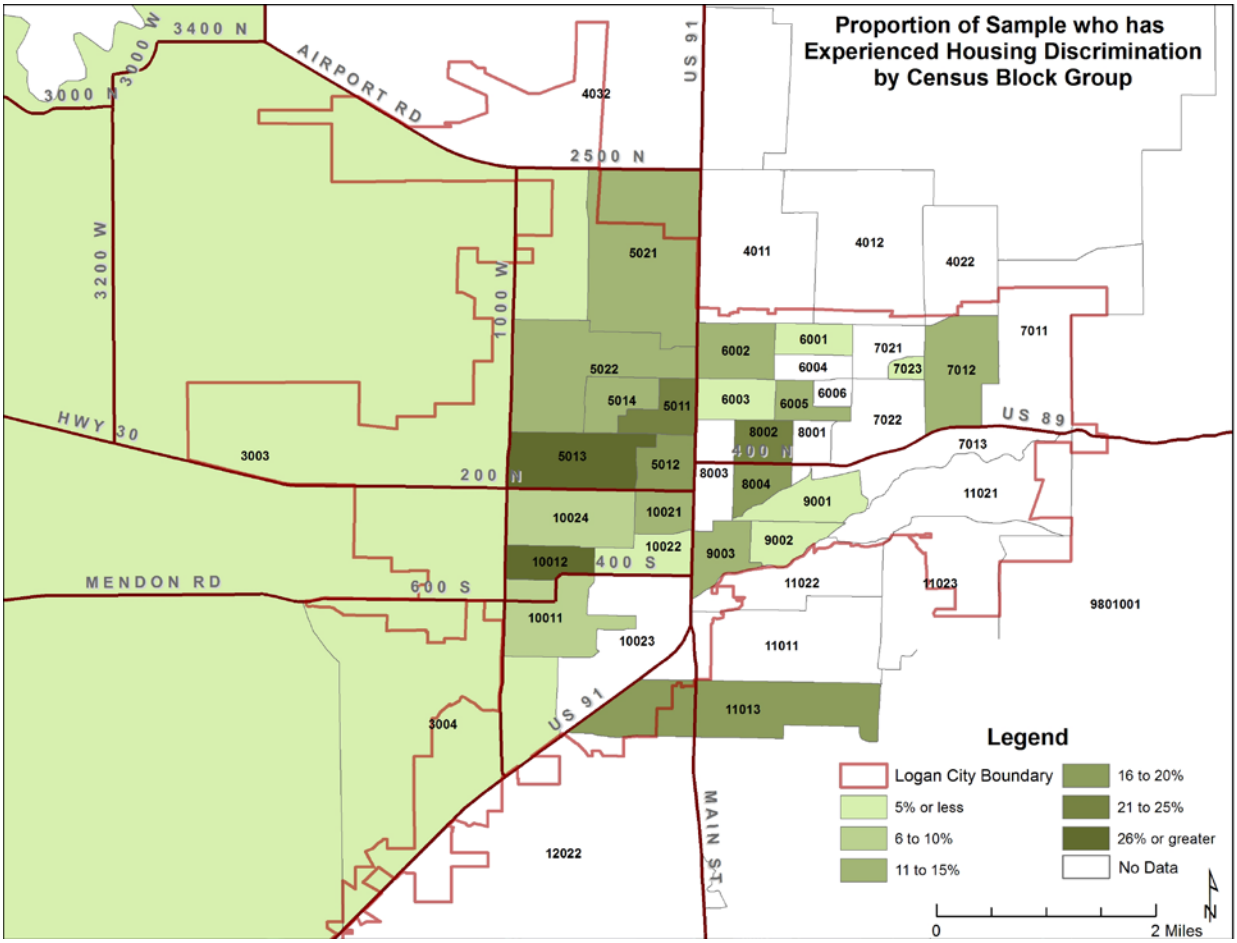
Map II-2. Average % of Fair Housing Knowledge Items Correct by Block Group



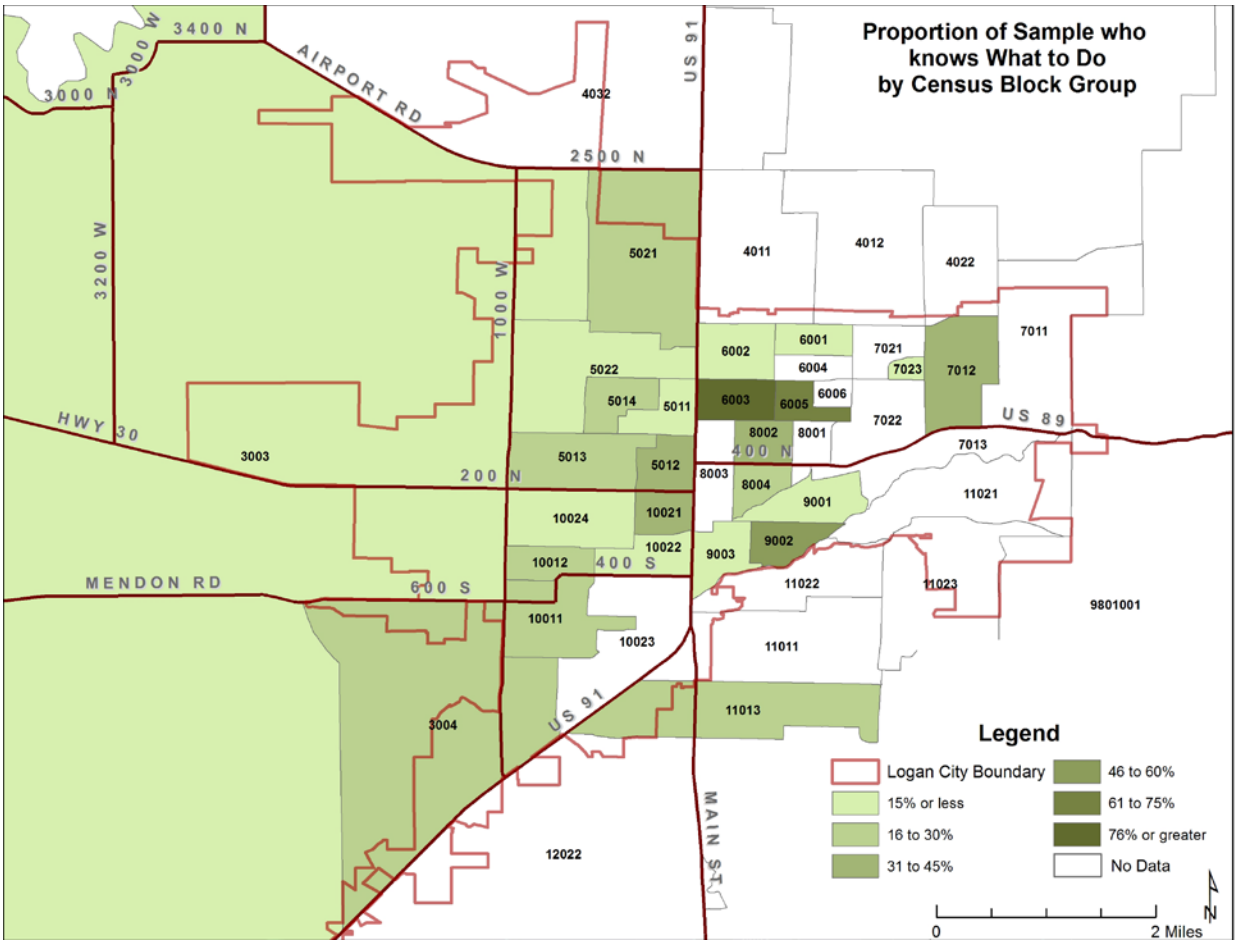
To measure fair housing awareness, two items were used: “I’ve heard of the fair housing law;” and “I know what to do and who to contact if I feel that I am being discriminated against in housing.” Respondents were asked to respond on a 5 point likert scale ranging from 1=Strongly Disagree to 5= Strongly Agree. Participants’ responses were dichotomized such that agreement or strong agreement with the two

statements indicated awareness whereas neutrality, disagreement and strong disagreement indicated a lack of awareness. While nearly 45% of participants had heard of the Fair Housing Law, only 19% knew what to do and who to contact if they experienced housing discrimination. See Maps II-3 and II-4 below for a spatial depiction of these data.

Map II-3. Proportion of Individuals in Logan City who have Heard of the Fair Housing Law by Block Group



Map II-4. Proportion of Individuals in Logan City who Know What to Do and Who to Contact if they Experience Housing Discrimination by Block Group



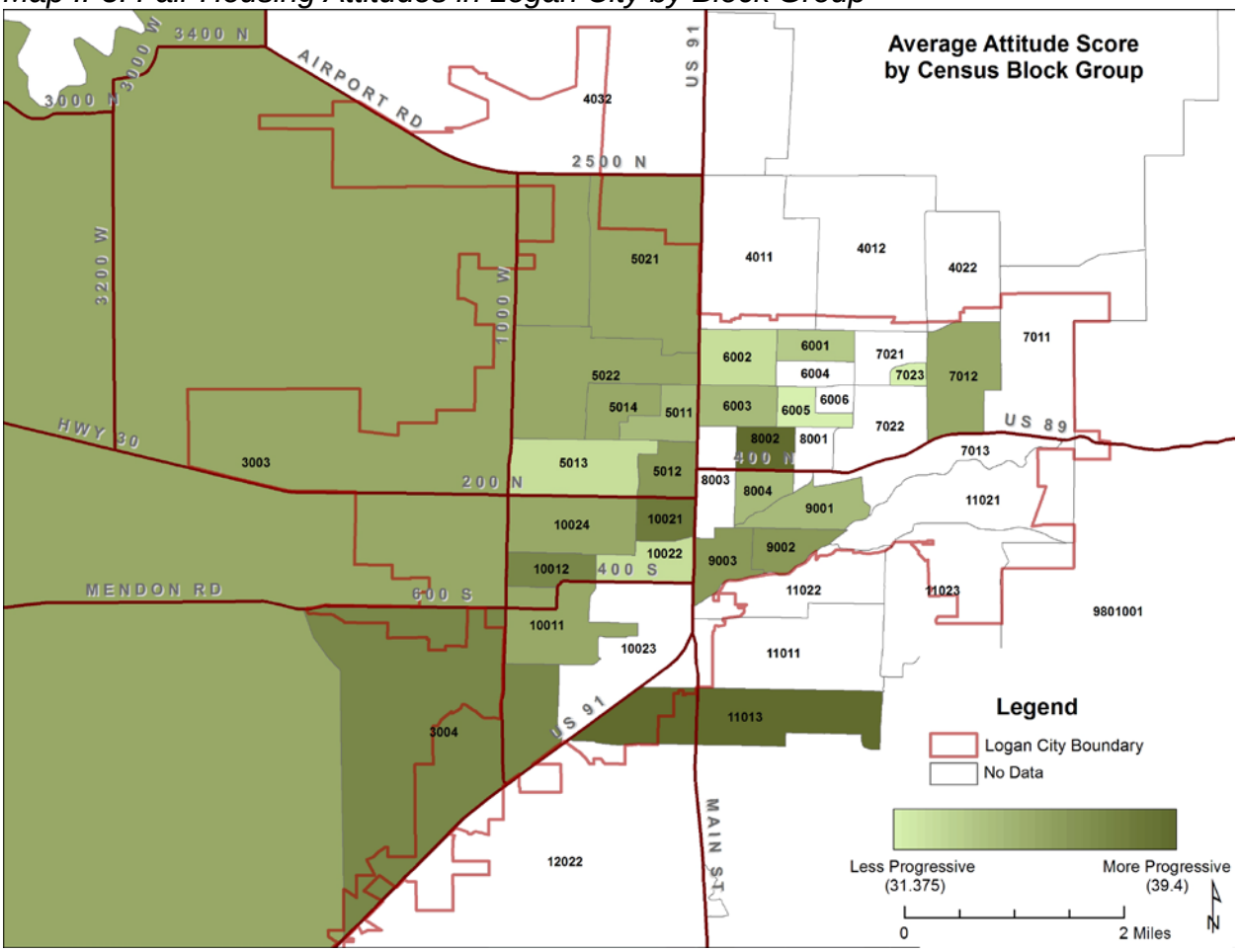
Attitudes related to Fair Housing Law. The Fair Housing Attitude Scale was a nine-item Likert-scale that measured the respondent's attitudes related to fair housing. Respondents were asked to rate how much they agreed or disagreed (1=Strongly Disagree to 5=Strongly Agree with each of the nine items related to Fair Housing (See table II-2 below for details). The nine items were summed to create a scale score of fair housing attitudes, and reverse coding was used where applicable. The scale ranged from 5 to 45, with higher scores indicating more progressive attitudes about fair housing. Participants had an average score of 35.23 (SD=5.3), showing moderately progressive attitudes about fair housing on the whole. For a spatial depiction of fair housing attitudes, please refer to map II-5 below.

Table II-2. Attitudes related to Fair Housing Law, Means and Standard Deviations

Survey Question (1-5, higher numbers indicating higher agreement)	M	SD
Real estate agents should have the right to help people find homes based upon the client's racial preferences.	2.76	1.25

A loan officer should be able to require higher down payments from Hispanic families in order for them to get a mortgage.	1.60	0.77
An apartment building owner should be able to reject an application because of the applicant's religion.	1.45	0.70
An apartment building owner should be able to assign applicants with children to one particular building or section of a building.	2.87	1.13
An apartment building owner should be able to reject an application because of the applicant's (real or perceived) mental illness.	2.35	1.07
Large families should be restricted from renting in specific areas.	2.05	0.98
Housing discrimination should be reported.	4.26	0.72
There is a need for a Fair Housing Law.	3.83	0.96
The Fair Housing Law should not protect single women with children.	1.75	0.84

Map II-5. Fair Housing Attitudes in Logan City by Block Group



Community Stakeholder Interviews

Background

Over the course of three months, community stakeholders were purposively recruited to participate in interviews. Interviewees were initially identified by their involvement in the housing sector in Logan City (planning, nonprofits, real estate, lending). Secondarily, interviewees were identified by referral. All interviews were conducted in person at the work-site of each interviewee. In total, 8 interviews were conducted. In-depth notes were taken and then analyzed for common themes. The semi-structured interview guide is displayed in table II-3 below.

Table II-3. Semi-structured Interview Guide for Community Stakeholders

Question 1	Can you tell me about your professional background and how housing issues relate to your work or interests?
Question 2	Do you believe there are impediments to fair housing in Logan City? If so, what are they and why do you think they exist?
Question 3	Do you think an individual's neighborhood residence in Logan City influences aspects of their or their childrens' lives? If so, how?
Question 4	Have you observed any trends or issues related to the advertisement of available housing in Logan City?
Question 5	Have you observed any trends or issues related to the home sales or rentals in Logan City?
Question 6	Have you observed any trends or issues related to the financing of housing in Logan City?
Question 7	Are you aware of any measures Logan City is currently taking to facilitate fair housing? If yes, what are they?
Question 8	Do you have any insights regarding what Logan City could be doing better to facilitate fair housing? (e.g., information, training, networks, partnerships, policy changes, etc.)
Question 9	Do you have any other recommendations for how the Logan community can overcome impediments to fair housing?
Question 10	Do you have any ideas for other points of contact that I could interview?

Findings

Interviewees had educational backgrounds ranging from Bachelor's degrees to Doctoral degrees in family and consumer sciences, business, family finance, urban planning, social work, and landscape architecture and environmental planning. On average interviewees had 9.5 years of experience in the housing or closely related sectors with a range of 2 years to 23 years. Collectively, the interview data reflect 76 years of professional experience in the housing or related sectors.

Impediments. All interviewees unequivocally agreed that there are currently impediments to fair housing in Logan City, though there were discrepancies in terms of types of impediments reported. In summary, community stakeholders' responses centered on themes of:

(1) Lack of awareness of fair housing law on the part of landlords and renters
(2) Discriminatory beliefs and actions on the part of landlords aimed at:
    a. People with disabilities
    b. Non-English Speakers
    c. Large families with children and/or single mothers

d. People who do not belong to the predominant religion
(3) Discriminatory practices involving home purchasing and lending for the Latino community
(4) Zoning issues related to high density multifamily rental housing
(5) Lack of affordable *and* accessible housing for persons with disabilities

When discussing trends in housing discrimination, 4 of the 8 interviewees noted how conditions have improved over time in Logan City. There was discussion of a movement from overt acts of discrimination (e.g., we will only rent to members of a particular religion), to more covert discrimination (e.g., we will advertise housing that includes statements about seeking renters with "values"). The majority of interviewees noted how the aforementioned groups of people tended to face discrimination in Logan City's rental market, and most attributed discrimination to landlords' preference for renting to people similar to themselves and a general sense of unawareness. Several interviewees noted that the landlords they encountered did not have malicious intent, and were quick to make accommodations (particularly for the disability community) once they were made aware of the unacceptability of their actions.

Few community stakeholders discussed serious concerns related to home-buying and lending, most likely due to the small number of individuals interviewed who felt qualified to speak on the issue. Nonetheless for the 2 who did, they discussed these issues as they relate to the Latino community. Realtors discussed how careful the realtor profession is about adhering to fair housing law and the professional oversight their associations provide; however, they mentioned instances in which there are multiple offers and home-sellers disproportionately accept offers from individuals who do not have Latino surnames. Additionally, the disproportionate amount of paperwork that some banking institutions unwittingly require from their equally as qualified Latino borrowers was discussed.

Five out of eight community stakeholders noted their concerns with Logan City's zoning and development. In particular, the North West quadrant of the city was discussed among interviewees as being problematic in terms of the high density multifamily housing that brings consistent residential turnover and puts stress on infrastructure (roads) and local schools (Bridger Elementary).

Current Measures Logan City is Taking. Seven out of eight community stakeholders were aware of the Good Landlord Program that Logan City offers to their local landlords. The Good Landlord Certification is an optional certification Logan City rewards rental owners with who participate in a Good Landlord course. The course encourages sensible rental practices, safeguarding the community from the unwanted effects of rental properties.[14] Two interviewees mentioned the community meetings, workshops, and focus groups that a previous CDBG administrator had held related to fair housing education and awareness.

[14] For details, see: http://www.loganutah.org/cd/business%20licenses/index.cfm#tab2

Future Measures Logan City should Take. Responses from community stakeholders regarding the ways in which Logan City could better affirmatively further fair housing are summarized in action recommendations below.

(1) Take additional measures to increase landlord awareness regarding fair housing law
(2) Take proactive steps in the form of outreach and education to prevent housing discrimination rather than responding in reactionary measures.
(3) Outreach to targeted communities, including:
    a. Spanish-Speaking Community
    b. Individuals living in high density rental and multi-family housing
    c. Disability Community
    d. Community-wide campaigns
(4) Diversification in zoning
    a. Mixed housing in the core of Logan City
    b. Inclusionary zoning clusters

Individual Interviews on Housing Discrimination

Background

Over the course of two months, individuals who had experienced some form of housing discrimination were recruited for participation in focus group interviews. Flyers were distributed widely throughout the community by targeting over 20 diverse businesses, churches, and community centers. Additionally, recruitment materials were sent out via email list-servs to social service providers and posted on various social media community bulletins. Additionally, postcard flyers were placed on windshields during Spanish Mass at St. Thomas Aquinas Catholic Church and on windshields at Smith's, Family Dollar, Spanish grocers, and Walmart on two Saturdays. Finally, participants were asked to help spread the word regarding the study to friends and family members. Despite a multi-pronged recruitment effort, researchers received relatively few calls or emails. Rather than conduct focus groups, the researchers completed in-depth individual interviews with individuals who met the study criteria (i.e., experienced housing discrimination, 18 years or older, and lived in Logan City at time of housing discrimination)(. community stakeholders were purposively recruited to participate in interviews. All interviews were conducted in person at a location of the interviewees choosing (e.g., home, office, coffee shop). In total, 5 interviews were conducted. In-depth notes were taken and then analyzed for common themes. The semi-structured interview guide is displayed in Table II-4 below, but it should be noted that the interviews took on many forms and were guided largely by the direction of the interviewees.

Table II-4. Semi-structured Interview Guide for Individuals who have Experienced Housing Discrimination

Question 1	Can you tell me a little about yourself? (e.g., how long have you lived in Logan City, do you have a family, what do you do for work, etc.)
Question 2	Can you tell me the story from start to finish about your experience of housing discrimination? (e.g., tangible actions taken by landlord, perceptions of discrimination,

	attributions, etc.)
Question 3	How did you respond to the discrimination you faced? What actions did you take and why?
Question 4	Why do you think housing discrimination occurs in Logan City, and who do you think is most vulnerable?
Question 5	What do you think needs to happen in our community to decrease housing discrimination?
Question 6	What steps could Logan City officials take to minimize housing discrimination?

Findings

Of the five participants interviewed, 2 were Latino/a, 2 were White. Four of the five were women, two of the five had a disability (mental or physical), and 1 of the five identified as gay. The age of interviewees ranged from 23 to 44. All five participants had experienced some form of housing discrimination that is considered illegal under the fair housing law, but the severity of the discriminatory actions varied quite a bit. Participants' experiences are briefly summarized in Table II-5 below.

Table II-5. Summaries of Housing Discrimination by Participant

Participant 1	White, gay, single mother with mental disability who uses a section 8 voucher gave her deposit and secured her apartment but was later contacted by the rental company and told that it was rented to someone else. She was eventually given the apartment after a family member advocated on her behalf. She has experienced numerous hostile situations with her property manager in which he harasses her regarding her bipolar diagnosis.
Participant 2	Latina, cohabiting woman who was told by her landlord she must pay an additional $50 per month for her rental unit because she was not married to her partner. She had numerous encounters in person and over the phone in which the landlord told her he knew he should not have rented to "people like her," presumably talking about her

	race/ethnicity.
Participant 3	White, single mother with 2 children who toured a rental home, wrote the deposit check, and filled out the paperwork in the presence of the landlord. The landlord asked her when her husband would be able to sign the paper work and she indicated that she was not married. The landlord said he would not be able to rent to her because he was worried about the consistency with which she would be able to pay rent (despite her financial records indicating otherwise).
Participant 4	White male with physical and cognitive disability who attempted to rent numerous apartments with a section 8 voucher. He was turned away from 3 first floor rental properties, he believes after each of the landlords saw him in person and in a wheelchair.
Participant 5	Latina, cohabiting woman with white, male partner who was asked by a prospective landlord if she was married to her partner. She tried to rent a 1-bedroom apartment, but was told the 1-bedroom apartments were for married couples only but that she could rent a 2-bedroom apartment for a higher price. Woman believes that religious affiliation may have played a role in being turned away from the rental property she desired.

Responses to Discrimination. Only 1 out of 5 participants took any action in response to her experience of housing discrimination. Participant 2, the Latina, cohabiting woman who was paying additional rent for being unmarried lived for the entire lease period in constant worry due to the hostility the landlord showed them following a noise complaint incident when they first moved in. The participant and her fiancé held a housewarming party and invited numerous family members (all of whom were Latino). The landlord called them, and with a raised voice, told them that he never should have rented to people like them because “they’re always loud and bring family to live with them.” Following another racial incident, the participant called someone at Logan City for help. The individual at Logan City referred her to the Division of Fair Housing at the State, and she filed an official housing discrimination claim. The process from filing to mediation with the landlord took almost a year. She did not file the claim until she had moved out of the rental unit for fear of retaliation. The investigator at the Division of Fair Housing compiled evidence on the claim and eventually held a successful mediation in which the outcomes included the participant being paid the additional $600 in rent that she had paid for being unmarried, and the landlord being required to attend a fair housing training. This participant reported feeling extremely satisfied in the actions taken and the City of Logan’s initial help in getting the process started.

None of the other participants reported taking any tangible actions in response to their experience of housing discrimination, and all of them agreed that they simply did not know what recourse they had.

Perceptions regarding Why Discrimination Occurs. With some very similar concepts brought up by community stakeholders, individual interviewees reported numerous reasons why they believe housing discrimination occurs in Logan City. These perceptions are summarized below.

(1) Lack of awareness on the part of landlords regarding fair housing mandates
(2) Lack of awareness on the part of renters regarding their rights and protections under the fair housing law

(3) Preferences on the part of landlords to rent to people who are similar to them (i.e., race, language, religion, etc.)
(4) Lack of consequences for landlords that allows discriminatory practices to go unchecked and relatedly lack of reporting for individuals who experience housing discrimination that would spur consequences for landlords.

Recommendations from Participants. Again, interviewees had similar recommendations to the community stakeholders. All participants stressed the importance of increased awareness of fair housing laws among both renters and landlords. Two participants indicated that sharing their story for the purposes of the AI was a step in the right direction.

Landlord and Rental Company Study

Background

In order to examine the extent to which landlords and rental companies in Logan city may hold biases against protected categories of persons, an additional study was conducted. For a period of three months, emails were sent in response to advertised rental units in Logan City. Emails were in response to rental advertisements on KSL and Craigslist online search engines on a weekly basis. Each week, listed properties that met inclusionary criteria were identified (between 1 and 3 bedrooms, and with physical addresses located within Logan City). A database was built in which all rental properties that met inclusionary criteria were entered into a list format and each corresponded to an assigned hypothetical renter. The list of hypothetical renters was randomized prior to the study so that each hypothetical renter had an equal chance of sending an email in response to each rental advertisement--this process minimized threats to validity and produced roughly equal numbers of emails sent per hypothetical renter. Our hypothetical renters included nearly identical email content, but we manipulated one sentence in the email inquiry that alluded to their protected class status (e.g., mentioning they have a service animal, using an obviously ethnic name, noting their use of a section 8 voucher, etc.). The demographic profiles of hypothetical renters are displayed in table II-6 below.

Table II-6. Demographic Profile and Email Language for Hypothetical Renters

Name **Email Address** **Condition**	**Email Language**
Jason Benner jasonjbenner@outlook.com **CONTROL**	Hello! I am writing to see if your listed ____-bedroom apartment [home] is still available? I recently graduated from BYU and my wife and I are looking for a nice place in Logan. We're well-qualified renters with good references. Thanks! --Jason
Juanita Ramirez juanita.m.ramierz33@gmail.com **FAMILY STRUCTURE**	Hello! Is your ____-bedroom apartment [home] is still for rent? I am looking for a place for me and my little girl. I am a well-qualified renter with references. Thanks for your time! --Juanita

Andrew Baker andrewbaker_999@yahoo.com **SEXUAL ORIENTATION**	Hello! I am wondering if your ____-bedroom apartment [home] is still available to rent? Our lease is up, and I am looking for a place for my partner and me. He and I both have strong references. Thank you, --Andrew
Jonathon Snyder jonathon.t.snyder@gmail.com **RELIGION**	Hello! I am writing to see if your advertised ____-bedroom apartment [home] is still available to rent? My wife and I are beginning our ministry at a new church start in Logan. We have great references and are financially qualified tenants. Thanks for your help! --Jonathon
Christine Jennings christine_jennings_44@outlook.com **SOURCE OF INCOME**	Greetings! I am curious if your ____-bedroom apartment [home] is available to rent? I have a section 8 voucher and am a very good tenant with references. Thank you for your time, --Christine
Shantel Watson shanmwatson@yahoo.com **DISABILITY**	Hi! Is your listed ____-bedroom apartment [home] still available to rent? I am looking for a place for me and my companion animal. He has all of his papers. I have plenty of references and am financially qualified to rent. Thanks! --Shantel
No Name tr_utah11@yahoo.com **COMPARISON**	Hello! Wondering if your advertised ____-bedroom apartment is still available? Qualified tenant with good references. Thanks for letting me know.

Over the course of three months, the type of response (if any) from the landlord or leasing company that each hypothetical renter received was recorded. Additionally, search engine used, advertised rent amount, number of bedrooms of the unit, type of landlord (private or corporate), and lag time between email sent and response received was recorded. In total, there were 168 rental units that met inclusionary criteria in the three-month study period. The average advertised rent for 1-bedroom rentals was $638 (n=30), for 2-bedroom rentals was $689 (n=82), and for 3-bedroom rentals was $825 (n=56). Eighty-four of the advertised rental properties appeared to be corporately run. At the close of the study period, each email that was sent was followed by a debriefing email that included the true purpose of the study and the chance for study participants (landlords) to withdraw their data. The aggregate results for the study are reported below.

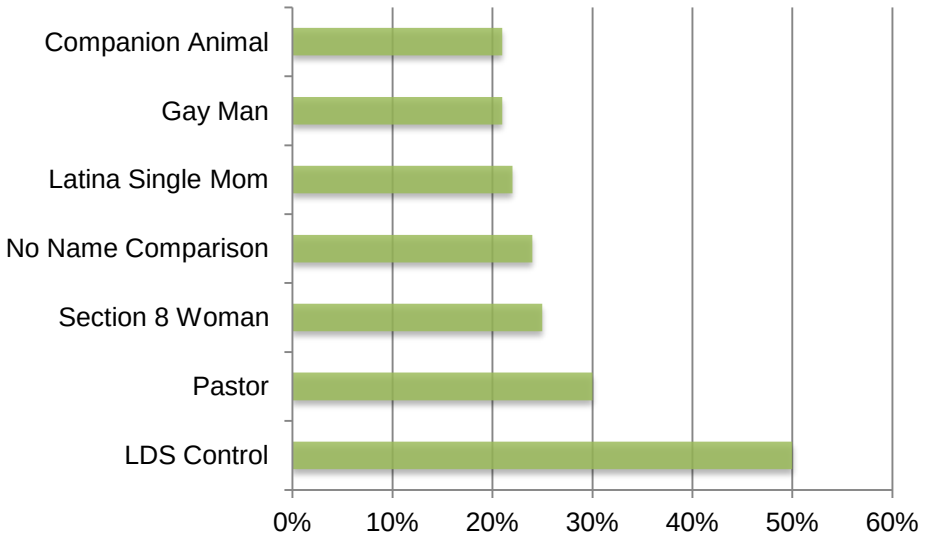
Findings

Of the 168 emails sent, there were 67 unique responses. Of those 67 responses, 46 were affirmative (i.e., the rental unit was indeed still available). It took an average of 1 day for landlords or rental companies to respond to the email inquiry. It is important to note that because online advertisements were sent out on a weekly basis to new listings, it is unlikely that many listed properties had already been rented. The substantial non-response can be expected when using online search engines, but tracking the number of affirmative responses by category uncovered the extent to which landlords disproportionately responded to certain applicants at initial contact based on their protected category status. Affirmative responses were defined as any email

response from the landlord or rental company in which they indicated that the property was still available for rent.

Descriptive results show that the White, presumably Latter Day Saint (LDS) male received more than double the affirmative responses when compared to almost every other protected category. Refer to figure II-2 below for a breakdown of affirmative response rates.

Figure II-2. Affirmative Response Rates by Protected Class Type



Although cell counts do not allow for extensive statistical testing, bivariate tests showed that the LDS control received statistically significantly more affirmative responses than did all other groups combined.

Summary of Public Participation Findings

When considering the findings from the Fair Housing Snap Shot study, community stakeholder interviews, individual interviews, and the landlord/rental company study there are several consistent findings. The first relates to a general sense of unawareness/lack of knowledge among residents of Logan City. Despite relatively high reports of housing discrimination (estimated 12% among community sample), very few people know what to do or who to contact if they experience housing discrimination. These data were triangulated in the qualitative studies, especially the individual interviews. Four out of five individuals who had experienced housing discrimination did not take any action. Further, these data on the whole show that landlords continue to engage in discriminatory practices (whether intentional or unintentional) in part because they, themselves, are unaware of the necessity to comply with fair housing law.

Results from the landlord study indicated that landlords and rental companies may hold biases that result in discriminatory screening of protected category renters despite being equally qualified. Importantly, the landlord study focused on what is the first stage of entering the renter's market: inquiring about the availability of the property. The study does not speak to whether or not rental properties are successfully rented, similar to various HUD matched-pair testing studies.[15] However, the entry point for seeking rental housing is increasingly through online channels and in response to online advertisements. If individuals are disproportionately and systematically screened out at the first stage of seeking housing, then this may evidence itself in unequal access to housing types and locations for all individuals. The screening process may be unintentional on the part of landlords and rental companies; however, it must be addressed.

SECTION III. FAIR HOUSING COMPLAINTS

According to HUD's Fair Housing Planning Guide, jurisdictions should include an evaluation of current fair housing legal status including the number and types of complaints that have been filed alleging housing discrimination. To undertake this task, data from the "FHEO Filed Cases' was used. [16] The Fair Housing Act prohibits most discrimination in housing transactions based on federally recognized bases (race, religion, familial status, etc.). These data reflect cases that are investigated by the Office of Fair Housing and Equal Opportunity (FHEO) within the Department of Housing and Urban Development or by state of local government agencies (FHAP agencies) who partner with FHEO to investigate these complaints. The latest data released show trends in complaints from 2008 to 2013. As can be seen in figure III-1 below, there are relatively little complaints that originate in Cache County, UT on a yearly basis. There

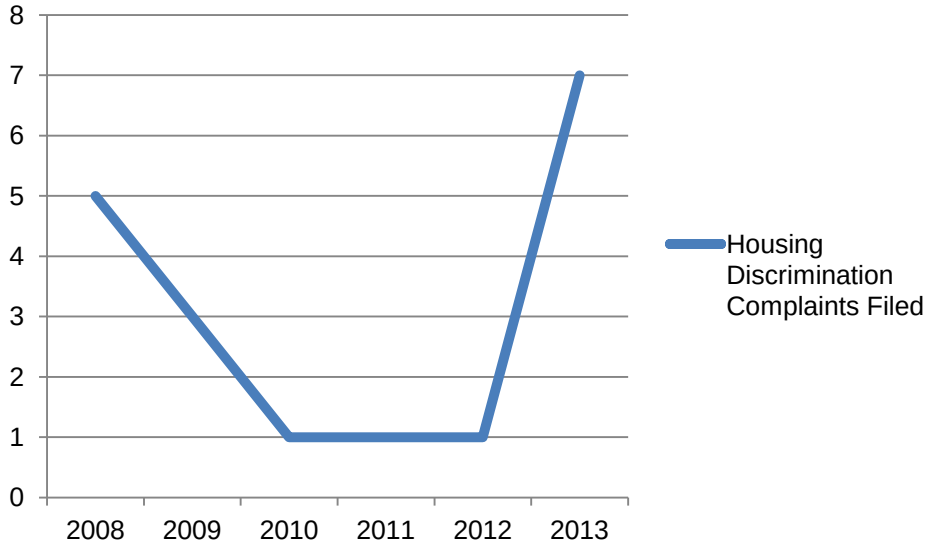
[15] For details, see: https://www.huduser.gov/portal/periodicals/em/spring14/highlight2.html

[16] See: https://catalog.data.gov/dataset/fheo-filed-cases

was a drop in 2008 and a significant spike in 2013, but even at the peak, only 7 complaints were filed in 2013.

Given the general unawareness that Logan City's public has concerning fair housing laws and protections and the 12% estimate of individuals who report having experienced some form of housing discrimination in Logan City from the Fair Housing Snap Shot study, it is highly likely that the number of housing complaints filed are grossly underestimating the number of legitimate housing discrimination acts that are committed in Logan City.

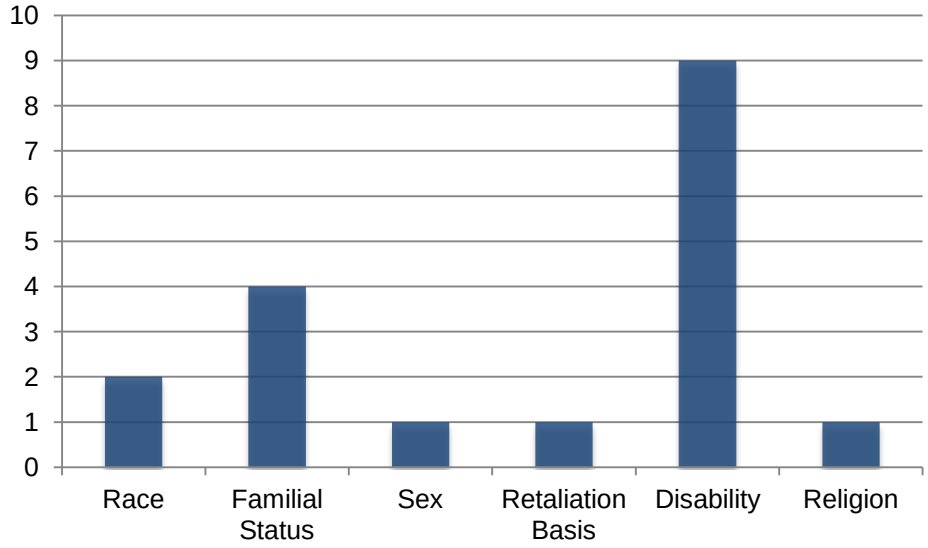
Figure III-1. Number of Housing Discrimination Complaints Filed in Cache County, Utah, 2008 to 2013



Source: FHEO Database, 2008-2013

Figure III-2 below shows the number of housing complaints within each category of federally protected persons as a sum between years 2008 and 2013. The two most often filed complaints in Logan City are on the basis of disability and family status. The larger number of disability complaints could be attributed to more prevalent discrimination against individuals with disabilities, but it could also reflect greater advocacy and empowerment in knowledge about fair housing rights for the disability community. In community stakeholder interviews conducted for the purposes of this AI, one stakeholder working in the disability community discussed how clients often reach out to advocacy organizations for assistance. It is possible that other groups of protected persons have less organized social structures that advocate specifically on their behalf.

Figure III-2. Number of Housing Discrimination Complaints Filed by Protected Category, Cache County, UT 2008-2013



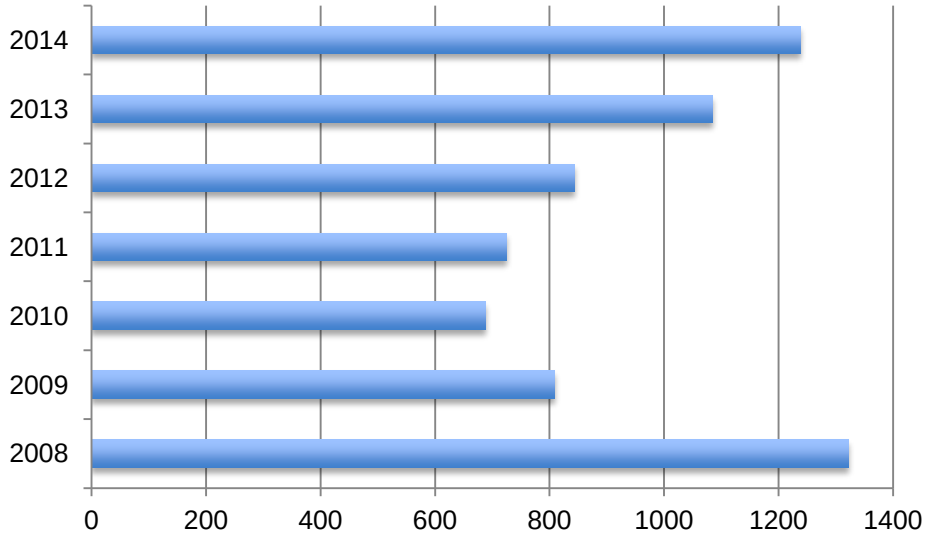
Source: FHEO Database, 2008-2013

SECTION IV. LENDING PRACTICES

HUD requires an analysis of private market conditions that contribute to fair housing impediments. Federal fair housing law prohibits discrimination in mortgage lending on the basis of protected categories (e.g., race, ethnicity, religion, etc.). Although it is difficult to ascertain whether lending trends reflect systematic discriminatory practices or are the result of objective assessment of borrowers' credit worthiness. Nevertheless, examining the trends presented below provide insight into the extent to which the Latino community in Logan City may or may not be subjected to discriminatory lending practices. The years 2008 to 2014 were chosen because the years 2008 and 2009 showed significant transition in lending practices following the mortgage crisis that occurred throughout the U.S. Since lending requirements tightened, an increase in denial rates for protected categories of persons might indicate systemic discrimination in the lending market. Between the years of 2008 and 2014 there was a significant decline in the number of mortgage applications received in Logan City. On average, the number

of applications received over this period of years was 959 per year. See figure IV-1 below for details.

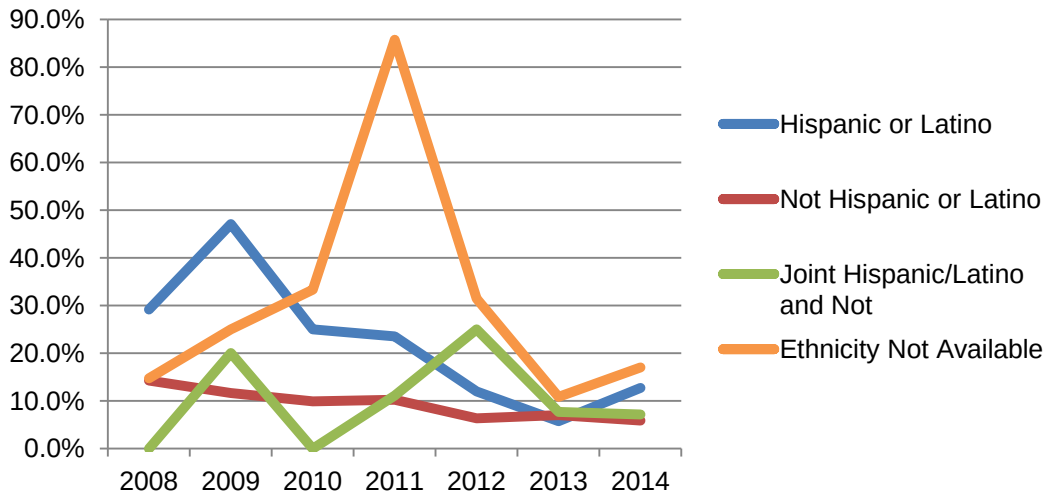
Figure IV-1. Trends in Number of Loan Applications Received in Logan City, 2008-2014



Source: FFIEC Mortgage Disclosure Act Data

As can be seen in figure IV-2 below, individuals who are not Hispanic or Latino (the majority of whom are White in Logan City) have had moderately low and declining mortgage denial rates. Although mortgage denial rates have similarly declined for Hispanics or Latinos they have done so more dramatically. Furthermore, the denial rates have been consistently higher for Hispanic or Latino persons compared to non Hispanic or Latino persons since 2008 with the exception of 2013. Finally, there was a slight upswing in denial rates for Hispanic or Latino persons in 2014. As noted above, there is no way to ascertain if the mortgage denial rates reflected below are a result of differential screening of applicants based on ethnicity or based on their credit worthiness or a combination of both. Nevertheless, it is noteworthy to point out that the denial rate for Hispanic or Latino individuals has steadily approached the denial rate for non Hispanic or Latino individuals indicating that it is unlikely that any discriminatory lending practices based on ethnicity are currently occurring in Logan City.

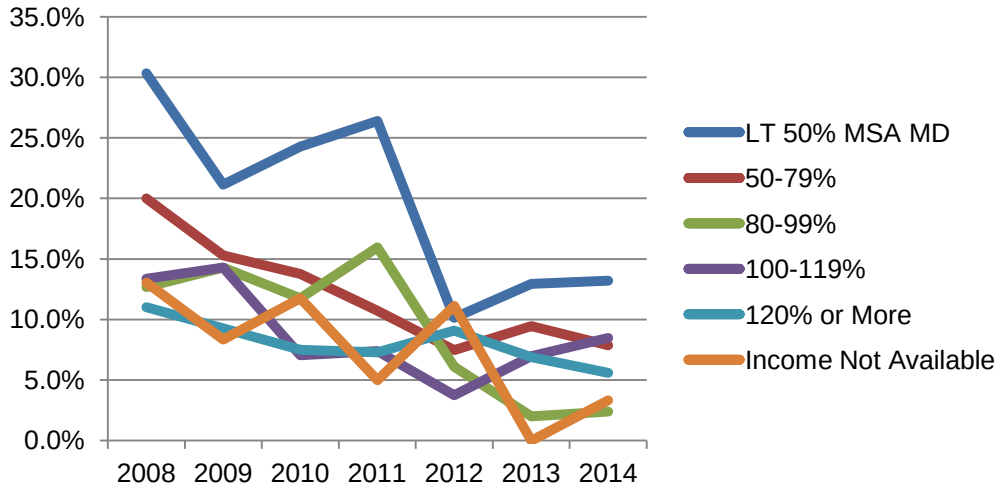
Figure IV-2. Mortgage Denial Rates by Ethnicity, Logan City, 2008 to 2014



Source: FFIEC Mortgage Disclosure Act Data

Figure IV-3 below shows how mortgage denial rates differ between income groups (defined as percentages of Metropolitan Statistical Area Median Income) and how these patterns shifted over time. For the most part, lower income groups tend to have higher denial rates, but all income groups have experienced declining denial rates over time. This is particularly promising for the two lowest income groups, showing increased opportunities for low-income groups to purchase homes in Logan City.

Figure IV-3. Mortgage Denial Rates by Income, Logan City, 2008 to 2014



Source: FFIEC Mortgage Disclosure Act Data

SECTION V. ZONING, LAND USE, AND HOUSING POLICY REVIEW

HUD requires that AIs include an analysis of zoning, land use regulations, and housing policies for CDBG entitlement jurisdictions. To undertake this analysis, Logan City

policies and documentation on the City's webpage were reviewed. Additionally, information gleaned from community stakeholder interviews helped guide the policy analysis. Logan City's previous AI,[17] General Plan,[18] and Housing Plan[19] were reviewed in addition to Logan City's current official zoning plan (see figure V-1 on the next page).

Logan City does not currently have any official fair housing ordinances or policies that are above and beyond compliance with State and Federal fair housing laws. Although the General Plan does not explicitly address fair housing, the most recent Housing Plan for Logan City does. The Housing Plan for Logan City describes goals including:

(1) Increasing number of homeownership opportunities especially for low-income households;
(2) Continuing to ensure that adequate numbers of housing units are available for special needs populations;
(3) Ensuring low- and very-low income, special needs, and minority populations have an adequate understanding of the housing resources available to them; and
(4) Ensuring vulnerable populations have an understanding of their rights and privileges as tenants, as denoted in the federal Fair Housing Act.

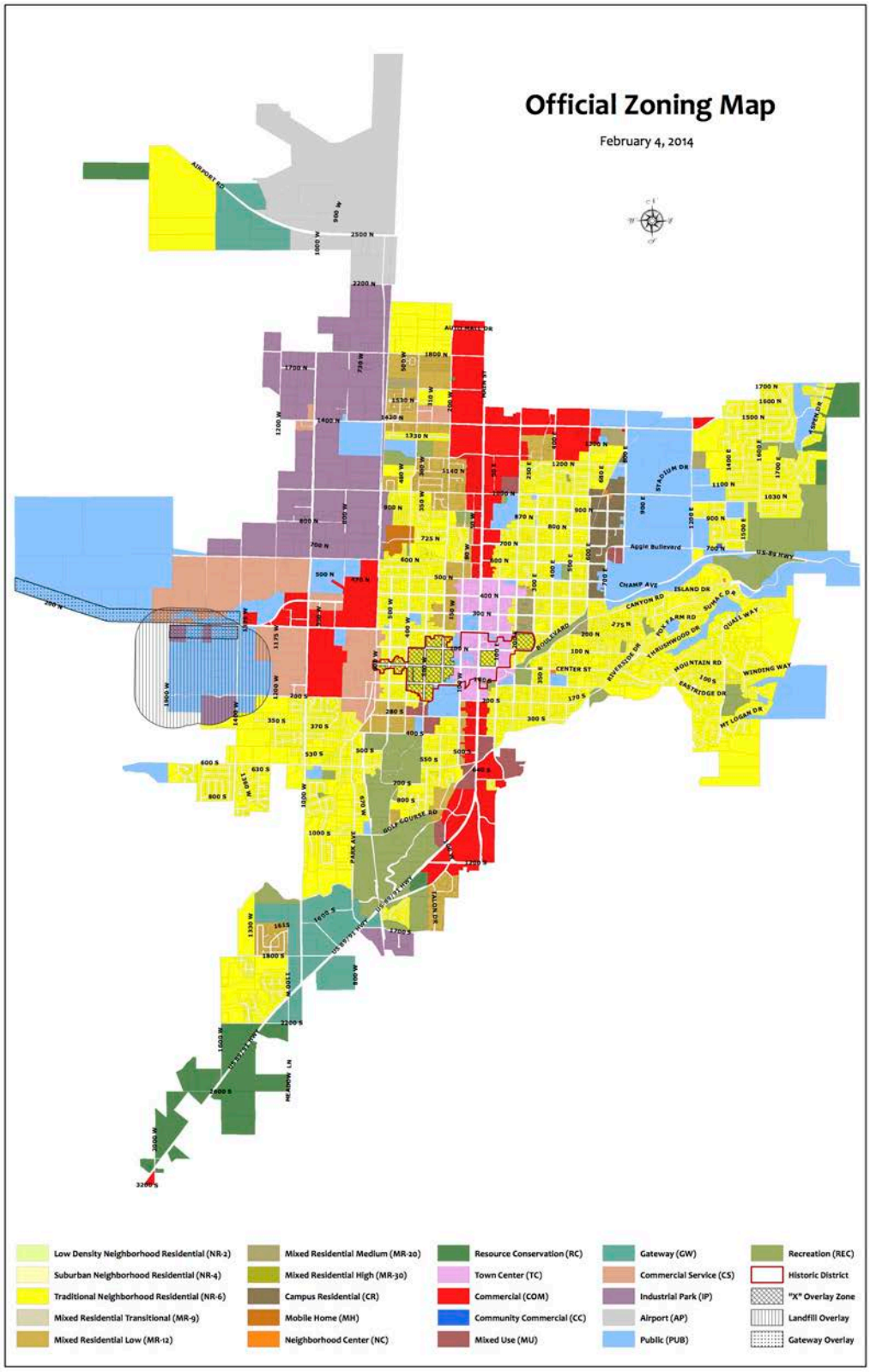
Logan City's previous AI does not make any conclusions about Logan City's current zoning and land use regulation; however, it does note how zoning laws are primarily designed to protect citizen health, safety and welfare by managing traffic, separating incompatible uses, and protecting property values. At the same time, it mentions that zoning laws have the potential to segregate communities by race and class or prevent lower-income individuals from entering particular neighborhoods based on the availability of multifamily rental properties and/or the lot sizes associated with single-family properties. Upon a synthesized analysis of Logan City's demographic profile maps, community stakeholder interviews, and the zoning map below, it is evident that there are concerns related to the high density of multifamily rental housing in the North West quadrant of Logan City and the unavailability of rental properties in the far east sections of Logan City. When comparing maps based on income and ethnicity for Logan City to the zoning map, it is clear that the Latino and lower-income populations in Logan City tend to live in western areas of the city. However, a historical analysis of Logan City's zoning maps shows that every neighborhood (with the exception of Cliffside and Hillcrest in the far east bench of Logan City) has increasingly diversified its zoning regulations to include mixed-residential housing. Several decades ago, the core of Logan City was zoned as rental housing. Over time Logan City has been rezoned mixed-residential in almost every neighborhood. As noted in section I, just over half of all available housing units in Logan City are rentals which indicates an abundance of rental options in varied neighborhoods. In recent years, more single-family housing options have been infused in neighborhoods, particularly more affordable single-family housing options on the west part of Logan City. Although community stakeholders suggest that rezoning parts of targeted traditional neighborhood residential to inclusive

[17] http://www.loganutah.org/CD/CDBG/documents/AI_Logan.pdf
[18] http://www.loganutah.org/CD/Planning%20and%20Zoning/General%20Plan/LoganGenPlan%20v20%20low%20for%20web.pdf
[19] http://www.loganutah.org/CD/Planning%20and%20Zoning/pdf/Logan%20Housing%20Plan%202011.pdf

zoning would expand housing choices in a variety of neighborhoods, Logan City has already taken great strides to increase mixed-residential zoning across the city. In one neighborhood just east of the University that has some available rental units, but few multi-family housing units (Hillcrest), the city has rezoned a large vacant plot of land to include mixed-residential housing. Although development has not yet occurred in that area, this shows a commitment to expanding housing options in a variety of units and in a variety of neighborhoods.

On the whole, Logan City is doing quite well to promote fair housing through zoning and land use regulations although there could be more explicit integration of fair housing in the next General Plan for the city. As noted in section I, segregation indices have held relatively steady in the last two decennial periods; however, Logan City must monitor and be responsive to the potential for increasing racial/ethnic concentration. Revisiting this issue on the next AI will be an important task.

Figure V-1 Logan City Official Zoning Map, 2014


Official Zoning Map
February 4, 2014
Low Density Neighborhood Residential (NR-2)
Suburban Neighborhood Residential (NR-4)
Traditional Neighborhood Residential (NR-6)
Mixed Residential Transitional (MR-9)
Mixed Residential Low (MR-12)
Mixed Residential Medium (MR-20)
Mixed Residential High (MR-30)
Campus Residential (CR)
Mobile Home (MH)
Neighborhood Center (NC)
Resource Conservation (RC)
Town Center (TC)
Commercial (COM)
Community Commercial (CC)
Mixed Use (MU)
Gateway (GW)
Commercial Service (CS)
Industrial Park (IP)
Airport (AP)
Public (PUB)
Recreation (REC)
Historic District
"X" Overlay Zone
Landfill Overlay
Gateway Overlay

SECTION VI. IMPEDIMENTS AND ACTION PLAN

Impediment	Explanation	Action Items	Lead	Collaborating Entities	Timeline	Milestones
1. Racial/Ethnic Concentration	There are currently 4 block groups in Logan City that have moderate or high concentrations of Latino individuals. Although these block groups have demographic profiles that do not point to vulnerability (e.g., quality schools, higher rates of homeownership, wide array of housing types, bedroom size, and vintage, access to transit, etc.) there is a need to address this issue to ensure that racial/ethnic concentration does not increase and impact fair housing choice for Logan's Latino residents.	• Invest in ESL/literacy programs as an opportunity to help ESL Latino residents achieve economic goals that could open up a wider variety of housing options across the city (e.g., on the East side of Logan where there tend to be higher housing values).	Logan City		Investment in ESL/literacy programs: *In progress*	During the remainder of the current CDBG Consolidated Plan, which expires after Program Year 2018, invest in at least 2 ELS/Literacy programs.
2. Racial/Ethnic spatial concentration of down payment assistance	Although there was a proportional representation of Latinos (16.4%) participating in the Welcome Home	• Work with Neighborhood Nonprofit Welcome Home program administrator to expand program for Latino participants, including developing a	Logan City	Neighborhood Nonprofit Utah State University CRIC	Outreach to lenders, realtors, Latino community and refugee community: *July 2016*	In three years, see proportional representation of Latinos in East and West portions of Logan City.

program participants	down payment assistance program, only 6% of Latino program participants (n=2) bought homes East of Main Street whereas approximately 21% of non-Latino program participants bought homes East of Main Street.	program component that encourages participants to view available properties in all neighborhoods in Logan City. • Outreach to realtors and lenders to promote the program among Latino community. • Translate application materials to Spanish. • Outreach to refugee community through CRIC.			Translate application materials: *December 2016*	In three years, see increased number of Latino families, particularly Spanish-Speaking Latino families accessing this program.
3. Racial/Ethnic disparities in accessing housing rehabilitation program.		• Increase outreach efforts to Latino community by first translating advertisements into Spanish with help from USU, and second, outreaching to key Latino community institutions to advertise the program (e.g., St. Thomas Aquinas Catholic Church, Spanish-Speaking Latter Day Saint Congregations, ELC, Latino Advisory Council, Bridger Elementary, USU's Access and Diversity, etc.). Additional outreach to refugee community through CRIC.	Logan City	Utah State University ELC CRIC	Translation of Advertisement: *September 2016* Targeted Latino Outreach: *Beginning October 2016*	In three years, see increased number of Latino families, particularly Spanish-Speaking Latino families accessing this program.
4. Lack of public awareness and knowledge	Community survey data indicated that the general public (using a sample	• Targeted educational outreach to vulnerable communities (e.g., persons with disabilities,	Logan City	BRAG Neighborhood Nonprofit USU	Targeted Educational Outreach Material Design: *May 2017*	In working with USU's Social Work Transforming Communities

regarding their rights under the Fair Housing Law	representative of Logan City) lacks necessary knowledge and awareness of fair housing laws. Without the requisite knowledge and awareness, renters and homebuyers may be unwittingly discriminated against and thereby steered out of their choice neighborhoods, further restricting access to all types of housing in all types of neighborhoods in Logan City.	refugees, LEP persons, etc.). Targeted outreach will involve distributing materials and offering to present to key social service agencies serving vulnerable communities (i.e. Cache Refugee and Immigrant Connection, English Language Learning Center, OPTIONS for Independence, etc.). Logan City will partner with BRAG, NNP, and USU to develop outreach materials. Logan City will work with USU to develop materials in Spanish. • Public awareness campaigns (e.g., during Fair Housing Month in April, make efforts on social media and in local newspaper to promote fair housing)			Targeted Educational Outreach Efforts: *Beginning June 2017* Public Awareness Campaign Design: *March 2017* Public Awareness Campaign Implementation: *Annually beginning April 2017*	Initiative, survey public during their annual community survey to assess public knowledge/awareness of fair housing law. See a marked increase in knowledge/awareness in 3 year's time.
5. Systematic discrimination in the rental market based on protected class status at first contact in seeking rental housing	Results from the Landlord and Rental Company email study indicated that landlords and rental companies may be systematically giving preference to individuals who do not fall into a protected class, and/or who are part	• Targeted small-scale educational opportunities for landlords (e.g., informational packets prepared by CDBG coordinator to be sent to all landlords at time of annual license renewal). CDBG Coordinator will work with key professors at USU as well as individuals from Utah's	Logan City	Utah's Division of Fair Housing Utah State University The Good Landlord Utah Apartment Association	Educational Mailings Designed: *December 2016* Educational Mailings Sent: *June 2016* Good Landlord Trainings Materials Generated: *December 2016*	Conduct similar landlord email study in 3 years to assess the extent to which landlords are systematically discriminating against protected categories of persons. In 3 year's time, see a decreasing amount of discrimination (i.e.,

	of the majority. Individuals from protected classes are only half as likely to receive favorable responses from landlords/rental companies when initially inquiring about the availability of rental properties. This may further restrict fair and equal access to all types of housing in all types of neighborhoods in Logan City. These results may point to a lack of awareness and knowledge among landlords and rental companies regarding their responsibilities under the Fair Housing Law	Division of Fair Housing to create content-rich educational mailings. • Logan City audits of Good Landlord training. • Integration of this content in Good Landlord Training. The CDBG coordinator will work with key professors at USU to develop training materials that address the responsibilities of landlords under fair housing law.			<u>Logan City Good Landlord Fair Housing Content Audit:</u> *July 2016* <u>Good Landlord Trainings Conducted:</u> *Twice yearly following audits and integration of FH content*	affirmative responses given to all email senders, regardless of protected class status).
6. Lack of affordable and accessible housing options for persons with disabilities.	Data from the community and housing profile suggest that persons with disabilities face a shortage of affordable and accessible housing options. Almost 10% of Logan City is comprised of persons with disabilities, and 26% of these individuals	• Develop Logan City-sponsored program designed to provide financial assistance for individuals with disabilities who wish to rent housing units in the private market that are not already accessible (i.e., building entrance ramps, etc.). • The Access and Mobility Plan - Targeted outreach to disabled populations in	Logan City	BRAG OPTIONS for Independence	<u>Program Start Date:</u> *March 2017* <u>Program Outreach/Advertisement:</u> *Ongoing* <u>Access and Mobility Plan</u> *Ongoing*	See incremental increases in numbers of individuals seeking accessibility retrofit assistance through the city.

	are considered low-income (n=1,230). Only 379 housing choice voucher program participants have a householder with a disability, meaning there are approximately 851 low-income households that have a householder with a disability who are likely to face challenges in the rental or housing market.	Logan to collect data regarding infrastructure deficiencies in Logan City. The plan will prioritize improvements for future CDBG funding. The plan is a component of FH as it will reduce the amount of housing that are isolated from the surrounding neighborhoods, and goods and services. • Use RDA funds for housing rehabilitation assistance used for improvements to owner-occupied homes (including access/ADA issues). • All new multi-family housing developments must continue to meet accessibility requirements set forth by the International Building Code Standards which Logan City adheres to.				