2019 Moderate-Income Housing Plan

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INTRODUCTION

Housing plays a vital role in the quality of life of the residents in any community. The City of St. George strives for healthy, well-balanced neighborhoods by providing a variety of affordable housing options throughout the community. This Moderate Income Housing (MIH) Plan will help to define and understand the challenges that come with providing affordable housing in the City of St. George.

Historically, the City has turned to the St. George General Plan for guidance on land-use decisions. This includes direction on affordable housing in the community. The purpose of this Moderate Income Housing Plan element of the general plan is to ensure that the City of St. George provides a reasonable opportunity for a variety of housing, including moderate income housing, to meet the needs of the population desiring to live in the City. Research has consistently shown that decent, affordable housing serves as a vital stabilizing function for households with modest incomes, which improves the community’s overall health, safety, and welfare while reducing crime and poverty.

In 1996 the Utah Legislature passed House Bill 295 requiring cities to include an affordable housing element as part of the general plan. In 2018, it passed House Bill 259 which reaffirmed the importance of planning for moderate-income housing in Utah. According to Title 10, Chapter 9a of the Utah Code, “Moderate-income housing is housing occupied or reserved for occupancy by households with a gross household income equal to or less than 80% of the median gross income for households of the same size in the county in which the city is located.” The United States Department of Urban Housing, or HUD, has created income brackets to determine the eligibility of applicants for certain federal housing programs. This MIH Plan will use these brackets to analyze the housing needs in the City of St. George. The brackets separate the HUD Adjusted Medium Family Income (HAMFI) into four categories shown below. This MIH Plan will focus on the housing needs for the first three categories.

1. Extremely low-income (≤30% HAMFI)
2. Very low-income (30-50% HAMFI)
3. Low-income (50-80% HAMFI)
4. Non-low income (≥80% HAMFI)
The following terms are found in this document and are often used by state, federal, and nonprofit housing programs.

**Affordable Housing**: Any housing unit in which the occupying household pays no more than 30 percent of its gross monthly income for gross housing costs.

**Affordability**: The broadest measure of the extent to which enough housing units of different costs can provide each household with a unit it can afford. It addresses whether sufficient housing units would exist if allocated solely on the basis of cost. The affordable stock includes both vacant and occupied units.

**American Community Survey** (ACS): The American Community Survey is an ongoing survey by the U.S. Census Bureau. It regularly gathers information previously contained only in the long form of the decennial census, such as ancestry, educational attainment, income, language proficiency, migration, disability, employment, and housing characteristics. Sent to approximately 295,000 addresses monthly, it is the largest household survey that the Census Bureau administers.

**Area Median Income** (AMI): Also known as HUD Adjusted Median Family Income (HAMFI). AMI, or i.e. HAMFI, is a statistic generated by the U.S. Department of Housing and Urban Development (HUD) for purposes of determining the eligibility of applicants for certain federal housing programs. AMI is not actually the true mathematical median income of a county or city. It is approximately equal to the median household income of a 4-person family household in a county. This plan uses HUD’s 2018 Section 8 income limits and HAMFI figures in its analysis of St. George’s housing needs.

**Availability**: A more restrictive measure of the extent to which sufficient housing units of varying costs can be provided to a particular income range. A unit is available at a given level of income if (1) it is affordable at that level and (2) it is occupied by a renter either at that income level or at a lower level or is vacant.

**Comprehensive Housing Affordability Strategy** (CHAS): A data series derived from the American Community Survey that categorizes households and housing units according to household income and housing affordability within HUD’s program eligibility framework.

**Cost-burdened Household**: Any household paying 30 to 50 percent of its gross monthly income on housing costs.
**Moderate-Income Housing:** Housing occupied or reserved for occupancy by households with a gross household income equal to or less than 80% of the median gross income for households of the same size in the county in which the city is located.

**Severely Cost-burdened Household:** Any household paying more than 50 percent of its gross monthly income on housing costs. (A.k.a. worst case needs household by HUD).

**Subsidized Housing:** A generic term for housing units whose occupants receive a means-tested government voucher or certificate to help pay their housing costs, or multifamily housing units whose developer received a government subsidy to build and operate as low-income housing. HUD uses the following income limits to determine housing program eligible: following income brackets: 1) Low-income [50-80% AMI], 2) Very low-income [30-50% AMI], and 3) Extremely low-income [<30% AMI].

**Workforce Housing:** Housing that is intended for households with a gross household income between 60 percent and 120 percent of the area median income, and has at least one member of the household employed in the local labor pool. Workforce housing is typically subsidized by municipalities to retain people in vital occupations, but who may have below average incomes, such as teachers, police officers, firefighters, and nurses.

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**DEMOGRAPHICS**

**Population and Growth**

In 2017, the City of St. George had an estimated total population of 84,405 residents according to the U.S. Census Bureau. It is estimated that St. George had a net increase of 11,418 residents between 2010 and 2017. The estimated population for 2018 is 87,275. With this same growth rate, our estimated population in 2023 would be 103,154. These additional residents would equate to 5,611 new households over the next five years, based on the city's current average household size (3.14). This equates to approximately 1,122 new households per year.

Building permit data indicates that in 2018 the City had a total of 1,247 residential permits issued which equates to 1,347 new housing units (accounting for multi-unit buildings). If the growth rate continues at the same pace, as mentioned above, and the building rate continues at its current pace, the City would be creating sufficient housing for the growth rate. The building permit totals for housing units for the past two years are as follows:

<table>
<thead>
<tr>
<th>Building Permit Totals for Housing Units</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Type</strong></td>
</tr>
<tr>
<td>Single Family Residential</td>
</tr>
<tr>
<td>Duplex</td>
</tr>
<tr>
<td>Condo/Townhome</td>
</tr>
<tr>
<td>Apartment</td>
</tr>
<tr>
<td><strong>Total Units</strong></td>
</tr>
</tbody>
</table>
Ethnic and Racial Minority Populations

According to the U.S. Census Bureau, 11.4% of the population of the City of St. George reported a race other than white and not Hispanic, and 13% of the total population are of Hispanic descent. The chart below demonstrates the City of St. George’s Ethnic and Racial makeup:

National research has indicated that the proportion of racial and ethnic minorities may be moderately correlated with an area’s poverty level. In 2017, the National percentage of population living below the poverty threshold was 13.4%. For the state of Utah, the poverty level was lower at 9.7%. However, in the City of St. George, the poverty level is higher with 15.5% living below the poverty threshold. The chart to the right illustrates the percentage of the population living in poverty is higher within the minority population, though every category has a percentage of the population living in poverty (ACS, 2013-2017 estimates).
SPECIAL NEEDS POPULATION

It is important for the City of St. George to address affordable housing for those with special needs. People with special needs may include vulnerable populations such as senior citizens, people with disabilities, the homeless, or those otherwise in need of specialized or supportive housing.

Seniors/Elderly

The City of St. George has a significant senior population. There are approximately 17,166 residents 65 years of age or older, representing 21.5% of the total population. Approximately 7% of these seniors are living at or below the poverty level. Many of the elderly who own their homes are living on fixed incomes, and their housing affordability is affected by property values, maintenance, and utility costs. For seniors who do not own their homes, obtaining affordable housing becomes even more difficult. Many elderly citizens can no longer remain in their own homes for a variety of reasons. As these citizens move out of their homes, demand for senior rental housing opportunities will increase. The St. George Housing Authority does offer affordable housing options for seniors within the City. They have public housing and Section 8 housing options that cater specifically to seniors.

Disabled

People with disabilities comprise approximately 13.8% of the City of St. George’s total population, or 10,939 individuals. 13.7% of the disabled population are at or below the poverty level. People with disabilities often face financial and social difficulties that make it difficult to obtain housing. Programs that are geared toward helping people with disabilities obtain housing include: low rent and public housing voucher programs, assistance through centers of independence, and employment and training resources.

Homeless Population

According to the Washington County Local Homeless Coordinating Committee there are an estimated 245 homeless people in Washington County. This number is up from an estimated 133 in 2017. St. George has several organizations dedicated to assisting the homeless population. One of these organizations is Switchpoint Community Resource Center. Switchpoint aims to empower homeless families and individuals by addressing the underlying cause of poverty and supporting them on their journey to stable affordable housing. Designated affordable housing funding from the Redevelopment Agency of the City of St. George has supported Switchpoint from the beginning, including a recent investment of $700,000 towards construction costs for Riverwalk Village, a new affordable housing project being developed by Switchpoint. Riverwalk Village will have 55 units and will provide both housing for chronically homeless individuals and affordable housing units for residents that fall into the moderate-income bracket.

Veterans

The City of St. George is home for many veterans. Overall, the income status of veterans in St. George fares better than that of nonveterans. Based on the 2013-2017 American Community Survey, there are 59,220 residents in St. George age 18 years and older. Of these, approximately 8.6% are veterans, or 5,103
people; 95.5% are male and 4.5% are female. Of the Veteran population, 74%, or 3,778 are age 65 and older. In addition, 2,002 veterans, or 39.5%, report having some form of disability, meaning that 19.5% of the city’s disabled population age 18 years and older are veterans.

Working-age veterans, 18 to 64 years, have a lower unemployment rate than nonveterans. Veterans have a 3% unemployment rate, while nonveterans have a 4.4% unemployment rate. 280 veterans were reported to be living below the poverty level, which is 8.9% higher than the city as a whole. The median income of a veteran, at $36,739 per year, is higher compared to the median income of a nonveteran which is at $23,546. This suggests that a single income household with a veteran as the income earner is more likely to afford a median housing unit in the city than a single income nonveteran household.

**Summary of Special Needs Housing**

The largest special needs population living in St. George is the senior cohort, making up 21.5% of the total population. The city has reinvested redevelopment agency funds to address poverty and homelessness through Switchpoint Community Resource Center and Riverwalk Village, and will continue to seek ways to increase affordable housing options for low and moderate income households.

**HOUSING AFFORDABILITY**

**Analysis of Income**

Housing affordability is a direct function of income. To understand the affordability of housing, we begin with an analysis of the income of the City of St. George’s residents. This is critical to understanding the City’s affordable housing need. This is done by using the Area Median Income. The U.S. Department of Housing and Urban Development (HUD) use a measure called the Area Median Income (AMI) to help determine the amount that a household at each income level can afford. The 2017 AMI for St. George is an annual salary of $54,022. HUD has determined specific income brackets for the AMI; they are as follows:

1. Extremely low-income (≤30% HAMFI)
2. Very low-income (30-50% HAMFI)
3. Low-income (50-80% HAMFI)
4. Non-low income (≥80% HAMFI)

The chart below illustrates the percentage of the City of St. George, Washington County, and Utah households whose total income falls within each income bracket. An additional bracket of 100% has been added to the chart to show the percentage of households earning more than the AMI.
Determination of Moderate Income

Moderate income is considered 80% of the AMI, or 80% of $54,022. In St. George, the moderate income for 2017 was an annual salary of $43,217 or less. In St. George, 42.5% of the households fall within the moderate-income bracket.

<table>
<thead>
<tr>
<th>Percentage of Area Median Income (AMI)</th>
<th>ST. GEORGE</th>
<th>WASHINGTON COUNTY</th>
<th>UTAH</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>AMI: $54,022</td>
<td>AMI: $55,175</td>
<td>AMI: $65,325</td>
</tr>
<tr>
<td>Household Income Amounts</td>
<td>Percent of Households</td>
<td>Household Income Amounts</td>
<td>Percent of Households</td>
</tr>
<tr>
<td>30% - Extremely low-income</td>
<td>$16,206</td>
<td>10%</td>
<td>$16,553</td>
</tr>
<tr>
<td>30% to 50% - Very low-income</td>
<td>$16,207 - $27,010</td>
<td>12%</td>
<td>$16,554 - $27,588</td>
</tr>
<tr>
<td>50% to 80% - Low-income</td>
<td>$27,011 - $43,217</td>
<td>20%</td>
<td>$27,589 - $44,140</td>
</tr>
<tr>
<td>80% to 100% - Non-low income</td>
<td>$43,218 - $54,021</td>
<td>12%</td>
<td>$44,141 - $55,175</td>
</tr>
<tr>
<td>100% - Non-low income</td>
<td>$54,023+</td>
<td>46%</td>
<td>$55,176+</td>
</tr>
</tbody>
</table>

Analysis of Affordable Housing

The AMI is used to determine how much a household at each income level can afford. According to current State and Federal definitions, housing is considered affordable when a household spends no more than 30% of their annual income on housing expenses, including mortgage or rent and utilities. Those that spend more than 30% of their monthly income on housing expenses are considered “cost-burdened” and are referred to as such throughout this document. It becomes increasingly difficult for households that earn just 30% of the AMI to live within the affordable housing guidelines since they cannot afford average market rental rates. It is vital to the well-being of the community that households of all income levels have affordable housing options.

The purpose of this plan is to guide the city in providing a variety of housing, including moderate income housing, to meet the needs of people of various income levels living, working, or desiring to live or work in St. George, allowing them to benefit from and fully participate in neighborhood and community life.

In 2017, the AMI for St. George was $54,022 annually or $4,502 monthly. Based on this standard, mortgage or rent and utilities should not exceed $1,351 per month for a median income earning household.
The same affordability standards apply to households that earn less than the AMI. For example, an extremely low-income household in the City of St. George earns 30% or less of the AMI, which is $16,206 annually or $1,351 monthly. Mortgage or rent and utilities should not exceed $405 monthly. The table below summarizes the maximum monthly affordable housing costs for various income levels in the City of St. George.

<table>
<thead>
<tr>
<th>Household Income Bracket</th>
<th>Household Income Amount</th>
<th>Maximum Monthly Housing Expenses</th>
<th>Estimated Monthly Utility Costs</th>
<th>Maximum Monthly Rent or Mortgage Expense</th>
<th>Maximum Mortgage Loan Amount (5.5% int., 30 yr. loan and $150 for utilities)</th>
</tr>
</thead>
<tbody>
<tr>
<td>30% AMI</td>
<td>$16,206</td>
<td>$405</td>
<td>$150</td>
<td>$255</td>
<td>$44,911</td>
</tr>
<tr>
<td>50% AMI</td>
<td>$27,010</td>
<td>$675</td>
<td>$150</td>
<td>$525</td>
<td>$92,464</td>
</tr>
<tr>
<td>80% AMI</td>
<td>$43,217</td>
<td>$1,080</td>
<td>$150</td>
<td>$930</td>
<td>$163,793</td>
</tr>
<tr>
<td>100% AMI</td>
<td>$54,022</td>
<td>$1,351</td>
<td>$150</td>
<td>$1201</td>
<td>$211,522</td>
</tr>
</tbody>
</table>

The table above, illustrates the difficulty for moderate-income residents (those that earn 80% of the AMI or less) to find affordable housing.

**Available Housing Prices**

Knowing the income levels and the cost of available housing in the City of St. George will help to determine if we are meeting the needs of all residents. Property research conducted on the Multiple Listing Services (MLS) page indicates that there were 566 total active properties for sale in the City of St. George, as of July 31, 2019. The median asking price is $419,900. On August 13, 2019, there were 122 properties listed for rent on realtor.com. The median rental price at that time was $1,400. The chart below categorizes the housing units as they correlate with the income brackets. (The estimates below account for $150 monthly utility costs and 5.5% interest on a 30-year loan for the for-sale properties.)

Source: 2017 HUD User Income Limits, MLS
Value of Existing Housing Stock

The current market value of the housing stock is used to determine affordability of home ownership. The chart below shows the current market values of existing homes in the City of St. George, categorized by affordability at various income levels. Six percent of the housing stock in the City of St. George is affordable to a moderate-income household, earning less than 80% AMI. Conversely, 94% of the existing available housing stock is only affordable to those that have an income above the moderate-income level. The chart below also depicts the number of existing affordable housing units by income level.

Affordability of Home Ownership

Approximately 42.5% of all households in the City of St. George earn a moderate income or below. Of those units listed for sale on www.zillow.com, 5% (28 units) are affordable to moderate income households.

An example for a household earning a moderate income ($43,217 or 80% AMI) in the City of St. George is as follows: A monthly budget of $1,080 for housing and utility expenses would support a mortgage of approximately $163,793 based on a 30-year fixed rate loan at 5.50% interest, an average monthly utility bill of $150. With a 20% down payment, the price of the home could be increased to $196,552. As of January 25, 2019, there were 28 homes on the market valued at or below $196,552, and there are approximately 1,134 (20.3%) households that fall within this specific bracket.

In order to estimate the affordability of home ownership at various income levels, a comparison will be used. The chart below compares the total number of households for each income bracket to the total number of dwelling units that are affordable for that income bracket.
According to the bar graph above, St. George appears to be lacking in affordable units for the households earning a moderate income (80% AMI). This graph shows that every bracket below the 80% AMI is deficient in housing units. While the two brackets above 80% AMI have an abundant number of units.

There are additional factors that can be calculated into the affordability of housing, such as rentals and secondary homes. There are approximately 6,808 non-primary residential buildings in the City of St. George. While many of these secondary homes might be valued higher than the low to moderate income population could afford, it still reduces the amount of available housing. Besides the availability of affordable housing, another concern is the number of cost-burdened households. Many owner-occupied households pay more than 30% of their income towards housing expenses and are considered cost-burdened. Being cost-burdened diminishes quality of life and reduces the ability to participate fully in community life.

**Affordability of Rent**

According to the American Community Survey (ACS) there are 9,303 occupied units paying rent in the City of St. George. The median cost for households paying rent is $952. According to ForRent.com (August 13, 2019) the median cost of rent for available units is $1400.00. For the residents within the moderate housing bracket (80% or less of AMI), their rent should not exceed $930. While the median rent in St. George, according to ACS, appears to be affordable for the moderate-income households, new moderate-income residents to the area may find it difficult to find affordable rental units in the current market.
High rent costs make it difficult for moderate-income households to find affordable housing. As previously mentioned, the goal is to keep housing costs below 30% of a household’s gross monthly income to avoid being cost-burdened. 2017 CHAS estimates indicate that 51% of rental households in the City of St. George are cost burdened. The chart below illustrates the number of cost burdened renter households in St. George.

**Cost Burdened Renter Households**

<table>
<thead>
<tr>
<th>Income Paid Towards Rent</th>
<th>Number of Households</th>
</tr>
</thead>
<tbody>
<tr>
<td>30.0 percent or more</td>
<td>4664</td>
</tr>
<tr>
<td>25.0 to 29.9 percent</td>
<td>957</td>
</tr>
<tr>
<td>20.0 to 24.9 percent</td>
<td>1,206</td>
</tr>
<tr>
<td>15.0 to 19.9 percent</td>
<td>1,124</td>
</tr>
<tr>
<td>Less than 15.0 percent</td>
<td>1,194</td>
</tr>
</tbody>
</table>

**Affordability Gap**

In examining the affordability of rent, it is important to look at the affordability gap. The affordability gap is the amount of affordable and available units compared to the amount of households that fall within the specific income bracket for those units. The chart below examines the affordability gap in St. George. In looking at the section below titled *St. George’s Affordable and Available Rental Housing Deficit*, we see the gap widen as the income bracket lowers. For example, for the households within the Low-Income bracket, there are 2,445 affordable units within the city and a deficit of 115 available units. However, the further you move down the income bracket, the larger the deficit becomes. This is evident in the Extremely Low-Income bracket where there is a deficit of 905 affordable units within the city, and a deficit of 1,280 available units.
Affordable Housing Gap: St. George, 2011-2015

St. George’s Renter Households by Income Level

- Extremely Low Income (≤30% HAMFI): 1,585 (17.2%)
- Very Low Income (30-50% HAMFI): 2,245 (24.3%)
- Low Income (50-80% HAMFI): 3,605 (39.1%)
- Non-Low Income (≥80% HAMFI): 1,790 (19.4%)

St. George’s Proportion of Cost Burdened Renter Households

- Cost Burdened: 88.0%
- Severely Cost Burdened: 77.7%

Comparison of St. George and Washington County’s Affordable & Available Rental housing units per 100 Renter Households

<table>
<thead>
<tr>
<th>HAMFI LEVEL</th>
<th>Affordable Units</th>
<th>Available Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low Income  (≥80% HAMFI)</td>
<td>143.5</td>
<td>98.0</td>
</tr>
<tr>
<td>Very Low Income (50-80% HAMFI)</td>
<td>167.8</td>
<td>111.4</td>
</tr>
<tr>
<td>Extremely Low Income (30-50% HAMFI)</td>
<td>49.4</td>
<td>28.5</td>
</tr>
<tr>
<td>Low Income (≥80% HAMFI)</td>
<td>5,620</td>
<td>5,505</td>
</tr>
<tr>
<td>Very Low Income (50-80% HAMFI)</td>
<td>1,585</td>
<td>1,766</td>
</tr>
<tr>
<td>Extremely Low Income (≥30% HAMFI)</td>
<td>885</td>
<td>80</td>
</tr>
</tbody>
</table>

The housing stock in the City of St. George is primarily made up of single-family homes, with a limited supply of multi-family housing and mobile homes. The 2017 American Community Survey (ACS) estimates that of the City of St. George’s 34,410 housing units, 25,693 are single-family homes; 7,293 are multi-family housing (2+ units); and 1,411 are mobile homes, RV, etc.

**Source:** 2017 ACS 5 Year

### Housing Occupancy and Vacancy

Housing occupancy plays a role in affordability. Out of the 34,410 housing units in the City of St George, 27,803 of the units were occupied while 6,607 were vacant. Of the occupied housing units, 17,966 were owner occupied, and 9,837 of the units were rented.

### Age of Housing Stock

Approximately 85% of the housing stock in the City of St. George was built in 1980 or later, with approximately 3% built before 1960. Breaking that down even further, approximately 66% of the housing stock is no more than 28 years old which is relatively new and typically need less repairs. However, approximately 34% of the housing stock is at the age of needing ongoing maintenance to adequately supply enough affordable housing.
Condition of Housing Stock

The majority of the housing stock in St. George is categorized as in either excellent, fair or moderate condition. However, the City does have a few severely deteriorated and dilapidated homes. Homes that are severely deteriorated are homes that are beyond acceptable limits and need several major repairs. Dilapidated homes are ones that are uninhabitable and need to be completely replaced. In 2016, the City ordered one small apartment complex to be demolished due to its dilapidated condition. In 2017, besides a few homes that were demolished due to recent fires, there were no demolished structures ordered by the city due to their dilapidated condition.

ZONING REGULATORY ENVIRONMENT

In order to evaluate the potential for moderate income housing in the community, it is important to understand the regulatory environment for residential housing. Zoning regulations govern the use, lot size, and building size for new developments. These regulations have a direct impact upon the opportunity to provide affordable housing within the community.

Survey of Residential Zoning

The majority of the City of St. George is comprised of single-family dwellings. However, recent years have shown a significant increase in multifamily developments which can increase affordable housing options for low and moderate income households.
The City’s zoning ordinance reflects this dynamic. Below is a description of the districts, in which
residential dwellings are allowed in the City.

use. Density of development is according to specific zone. A-1 allows a minimum density of 40,000
square feet per lot. The A-5 zone allows a minimum density of 5 acres per lot. The A-10 and A-20
allow a minimum density of 10 and 20 acres per lot respectively.
2. Residential Estate Zones (RE-5, RE-12.5, RE-20, and RE-37.5): These zones also allow for single-
family housing choices. Minimum lot sizes for each specific zone correspond with the last number
of the designation and are 5 acres, 12,500 square feet, 20,000 square feet, and 37,500 square feet.
3. Single-Family Residential Zones (R-1-6, R-1-7, R-1-8, R-1-10, R-1-12, R-1-20, R-1-40, and R-1-C):
These zones also allow for single family housing choices. The minimum lot sizes for each specific
zone also correspond with the last number of the designation. They are: 6,000 square feet, 7,000
square feet, 8,000 square feet, 10,000 square feet, 12,000 square feet, 20,000 square feet, and
40,000 square feet.
4. Multiple-family Residential Zones (R-2, R-3, R-4): These zones allow for multiple-family dwellings
and single-family dwellings on each lot.
5. Mobile Home Zones (MH-6, MH-8, MH-10, MH-12, MH-20, and MH-40): These zones allow for
mobile home parks and subdivisions. The minimum lot sizes for each specific zone also correspond
with the last number of the designation. They are: 6,000 square feet, 8,000 square feet, 10,000
square feet, 12,000 square feet, 20,000 square feet, 40,000 square feet.
6. Residential Central City Zone (RCC): This zone allows for single-family and multiple-family
dwellings. In addition, specific lot-size requirements and architectural design guidelines exist for
this zone.
7. Residential Planned Development Zone (PD-R): This zone allows for multiple-family and single-
family development. The density of these developments follow the established densities of the
General Plan. These densities are as follows:
   i. Very Low Density Residential: 0-2 units per acre
   ii. Low Density Residential: 0-4 units per acre
   iii. Medium Density Residential: 5-9 units per acre
   iv. Medium High Density Residential: 10-15 units per acre
   v. High Density Residential: 16-22 units per acre
8. Mixed-Use Development Zone (PD-MU): This zone allows for a mix of commercial and residential.
The densities are determined by the General Plan, with the Commercial designation to be
considered as High Density Residential.
9. Student Housing Development (PD-SH): The student housing zone is specifically designed for
student housing projects. Student housing projects may use a maximum density of 40 units per
acre.
10. Traditional Neighborhood District Zone (TND): This is a mixed-use development zone. This zone
allows for multiple-family housing and single-family housing.
11. Traditional Neighborhood Zone (TNZ): This is also a mixed-use development zone that allows
multiple-family and single-family housing. This zone is a form-based zone.

Evaluation of Zoning Code’s Effect upon Affordable Housing

The majority of the City of St. George’s Zoning Codes do not prohibit the development of affordable
housing for low to moderate income households. However, with lot size restrictions, density restrictions,
and the cost of development, developing affordable units becomes more difficult in single-family residential zones. The zoning regulations do allow for a Planned Development Residential zone that allows for a variety of housing types. Many of our PD-R zones offer a variety of housing types, including townhomes, condominiums, and apartments. This zone is customizable and can be used to create more affordable units. With the use of this zone and other multifamily zones, the City has approved entitlements for 10,101 new multifamily units in the last three years (2016-2018), with 2018 seeing the largest increase of multifamily entitlements, totaling 8,667 units.

The zoning code prohibits accessory dwelling units (ADU) in all residential specific zones. Allowing for ADU’s in single family residential areas could be used as a strategy to increase the supply of affordable rental housing, by allowing those owning homes the option to use under-utilized portions of their property.

FAIR HOUSING

Acknowledgement of the Utah Fair Housing Act

In accordance with the state and federal laws, the City of St. George exercises the authority to plan, zone, and regulate land-use in promoting the community’s health, safety, and welfare. The moderate income housing element of this plan acknowledges and upholds the Utah Fair Housing Act by promoting the equal protection and equitable treatment of all people who lawfully seek to rent, lease, purchase, or develop real property within its jurisdiction. Its housing policies and plans strictly prohibit discrimination on the basis of color, disability, ethnicity, familial status, gender identity, national origin, race, religion, sex, sexual orientation, source of income, or any other suspect classification. It is the policy of the City of St. George to report housing discrimination to the Utah Antidiscrimination Labor Division immediately. It is the goal of the City of St. George to prevent, eliminate, and/or mitigate any unfair housing practices that may result from its plans, policies, regulations, and ordinances. It is also the goal the City of St. George to affirmatively further fair and affordable housing by reviewing the housing needs of its moderate income households and its vulnerable populations biennially, and by proactively planning to meet their needs.

The purpose of an Analysis of Impediments is to assess conditions and factors that affect fair housing choice. Impediments to fair housing choice include actions taken because of race, color, religion, sex, disability, familial status, or national origin. Impediments to obtaining affordable housing can often have the effect of limiting housing options for the protected classes listed above. Therefore, the analysis focuses both on impediments to fair housing choice and to affordable housing.
Evaluation of Fair Housing Legal Status

Utah’s Fair Housing Act (Utah Code Annotated §57-21-1) prohibits discrimination on the basis of race, religion, color, sex, national origin, familial status, disability or source of income in the rental, purchase and sale of real property. According to The Utah Anti-discrimination and Labor Division, there were 28 fair housing related complaints in the City of St. George between 2013 and 2018. Fifteen of these complaints were related to a disability and five were related to retaliation. As many of the complaints are concerning disabilities, it suggests that disability discrimination is an ongoing issue in the city and could be an impediment to fair housing choices.

Currently, the only formal mechanism for identifying discrimination cases, based upon the parameters of the Fair Housing Act, is the incident of fair housing complaints. There are several annual trainings throughout the city geared to train landlords on housing discrimination. In order to more comprehensively analyze the level of discrimination in the region, it may be necessary to incorporate other methods, such as testing of landlords. However, such methods are not currently being utilized. The City of St. George should remain diligent in its efforts to ensure that housing is provided in accordance with the Utah Fair Housing Act.

ESTIMATED NEED FOR MIH

St. George has seen an increasing annual growth rate over the last few years. As the City continues to grow, Moderate Income Housing will also need to increase. In 2016 the growth rate was at 2.53%. In 2017 and 2018, it was 3.40%. If the 3.40% growth rate continues at 3.40% over the next five years, the population in 2023 will be 103,154. This increase in population will equate to 5,610 new households (using the current average household size of 3.14) by 2023. Currently, 42.5% of households fall within the moderate-income bracket. If this ratio holds, 2,384 new moderate income units will need to be affordable to accommodate these new households.

GOALS AND STRATEGIES

The purpose of this plan is to guide the city in providing a variety of housing, including moderate income housing, to meet the needs of people of various income levels living, working, or desiring to live or work in St. George, allowing them to benefit from and fully participate in neighborhood and community life.

The following goals and strategies are designed to help meet the housing needs of people coming from various income levels desiring to live in St. George.

Goal 1: Encourage sustainable housing

Strategy 1 — Promote programs offered by Utah Housing Corp and Workforce Services.
Strategy 2 — Inventory sites to consider for re-zoning that may be appropriate to develop workforce housing and higher density housing that is harmonious with the existing development of the city as mentioned in Utah Code 10-9a-403-2b-iii-A.

Strategy 3 — Eliminate or reduce parking requirements for residential development where a resident is less likely to rely on their own vehicle, e.g. residential development near a transit route, downtown area as mentioned in Utah Code 10-9a-403-2b-iii-H.

Strategy 4 — Promote affordable housing along established public transportation routes as mentioned in Utah Code 10-9a-403-2b-iii-G.

Strategy 5 — Promote moderate housing options throughout the city and encourage an appropriate mix in all areas.

Goal 2: Increase Affordable Housing Opportunities for Low to Moderate Income Households

Strategy 1 — Educate the public to understand and support the benefits of mixed-use and mixed-income communities.

Strategy 2 — Rezone for densities necessary to assure the production of moderate-income housing.

Strategy 3 — Create or allow for, and reduce regulations related to, accessory dwelling units in residential zones by establishing overlay districts that would allow “accessory dwelling units” to be used as apartments in certain areas in the city to increase the supply of affordable rental units as mentioned in Utah Code 10-9a-403-2b-iii-E.

Strategy 4 — Allow for higher density or moderate-income residential development in commercial and mixed-use zones, commercial centers or employment centers as mentioned in Utah Code 10-9a-403-2b-iii-F.

Strategy 5 — Explore zoning options and incentives for developers to provide moderate housing e.g. density bonus, modified standards, streamline city review process as mentioned in Utah Code 10-9a-403-2b-iii-J.

Goal 3: Rehabilitate and Preserve Existing Housing to Increase Rental Properties, Homeownership, and Reinvestment in the City of St. George
Strategy 1— Promote the use of the Single-Family Rehabilitation and Reconstruction Program to extremely low to moderate income households. This program offers low-interest loans and grants for maintaining and rehabilitating housing.

Strategy 2— Help locate moderate to extremely low-income families that need weatherization assistance. Assist these households to contact the Five County Association of Governments Weatherization Program. The Weatherization program lowers monthly utility bills by making housing more energy efficient.

Strategy 3 – Utilize strategies that preserve subsidized low to moderate-income units on a long-term basis by implementing a program that requires a price-preserving deed restriction on these units.