
THRIVING IN SALT LAKE CITY
PRESENTED BY
**STUDENTS OF
THE UNIVERSITY OF UTAH**

2022



CMP 6160 PLAN MAKING

Photo credit: Thomas Hawk

ACKNOWLEDGMENTS

Students from Plan Making:

Miguel Aguilera, Tereza Bagdasarova, Gordon Bennett, Jenna Benson, Pukar Bhandari, Anthony Biamont, Corey Bishop, Meghan Burrows, Cameron Carter, Kyungsuk Chae, Jonathan Concidine, Isabel Fuller, Will Goodreid, Anders Hart, Chimalli Hernandez, Lucas Horns, Emma Jones, Mason Kemp, Jacob Klopfenstein, Hyojeong Ko, Chanbin Lee, Jenn Leslie, Taylor Maguire, Anna Maki, Briant Novinska-Lois, Allie Parker, Noshin Siara Promy, Kristin Reidelberger, Brian Rojas, Patrick Ruiz, Matt Ryan, Cassandra Serna, Elizabeth Sodja, Megan Spencer, Rachel Stein, Alex Stewart, Sarah Stringham, Tyler Torres, Evan Van Tassel, Olivia Vielstich, Ethan Walker, and Faria Afrin Zinia

Led By:

Dr. Alessandro Rigolon, Assistant Professor, Department of City and Metropolitan Planning, The University of Utah

This project helps inform the broader city efforts to plan for the changing local landscape and address the issues associated with gentrification and displacement of its residents. It was created in coordination with the following local partners and those organizations associated with the Salt Lake City Thriving In Place SLC project:

<https://www.thrivinginplaceslc.org>

Salt Lake City Staff

Baird + Driskell Community Planning

The Urban Displacement Project - UC Berkeley Center for Community Innovation

University of Utah Department of City & Metropolitan Planning (Dr. Ivis Garcia and Dr. Alessandro Rigolon)

Turner Bitton, Director Of Development, HEAL Utah

Jennifer Mayer-Glenn, Director, University Neighborhood Partners

Maria Garciaz, Executive Officer, NeighborWorks

Saolo Betham, Community Leadership Partnership Manager, University Neighborhood Partner

Wisam Khudhair, University Neighborhood Partner

Valarie Elizabeth, Local Artist

TABLE OF CONTENTS

♦

Acknowledgments	2
Executive Summary	4

SECTION 1

Introduction	
Addressing Displacement Risk in SLC	6
Evaluating Displacement Risk	
Salt Lake City Background	7
Maps & Interpretations	8
Community Councils	9
Current Anti-Displacement Strategies	
Across SLC	13
Strategies to Preserve	
Strategies to Produce	
Strategies to Protect	
Community Engagement Results	
Engagement Methods	
Survey Results	
Takeaways	21
Thriving in Place: An Anti-Displacement Framework for SLC	
Strategy Overviews	24
Strategy Prioritization Process	
Description of Chosen Strategies	25
Strengths & Weaknesses	
Balance	30

SECTION 2

Introduction	
Community Councils	
Displacement Risk	
Background	
Takeaways	
Anti-Displacement Strategies Currently Used Across Neighborhoods	
Strategies Summary	
What We Heard From the Community	
Survey Results by Neighborhood	
Thriving in Place: Anti-Displacement Strategies Across Neighborhoods	
Three Strategies for Each Neighborhood	
Justifications	
Where Do We Go From Here	
Summary of Next Steps	
Appendix	
Tables	
Maps	

EXECUTIVE SUMMARY

♦

In recent years, Salt Lake City has experienced an unprecedented level of growth. This growth has brought a host of benefits and exciting opportunities for the city, but many residents—especially those living in historically underserved neighborhoods—worry as they watch their communities transform at a lightning pace. Many communities in Salt Lake City are facing fundamental changes, which are amplified for neighborhoods still experiencing the long-term effects of discriminatory lending practices and systemic inequality. To address these challenges, Salt Lake City has employed Thriving in Place, a planning effort rooted in community engagement to understand the needs and desires of residents and drive local policy decisionmaking.

In collaboration with UC Berkeley's Urban Displacement Project, Baird + Driskell Community Planning, and numerous local organizations, students from the University of Utah have engaged Salt Lake City's 14 neighborhoods to understand the current housing conditions of each and provide actionable feedback for the city. This was initiated in early Fall 2021 when students interviewed 420 residents and documented stories of neighborhood change, gentrification, and displacement. They also mapped community assets (e.g., meaningful places, cultural resources, institutions, and influential individuals) that residents feel the city should preserve as it evolves. The results of these efforts were published in a series of Storymaps and presented publicly to local decision makers and engaged residents.

As of Spring 2022, Thriving in Place's efforts concentrated on understanding experiences with gentrification and displacement through targeted surveying, focusing on neighborhoods most at risk of these pressures. These surveys centered around questions of personal experience with displacement and gentrification, along with resident interests in a range of policies that could address these issues. The city received over 1,500 responses, almost 500 of which were in-person intercept interviews. From here, students formulated a set of policy recommendations to help Salt Lake City preserve its existing housing stock, protect tenants, and produce more affordable housing options. The final results of this round of surveying in each neighborhood are reflected in this report, along with the city's existing anti-displacement efforts and policy recommendations.

CITYWIDE

**FINDINGS AND
RECOMMENDATIONS**

INTRODUCTION

ADDRESSING DISPLACEMENT RISK IN SLC

INTRODUCTION

Salt Lake City is experiencing overwhelming growth and change. Demand for housing is exceptionally competitive, and many low and moderate income residents are being priced out of the market and feeling gentrification and displacement pressures in their neighborhoods. Many of the city's neighborhoods are either facing some level of gentrification and displacement risk or they are already transforming and displacing residents. This is affecting long time residents, homeowners, renters, small local businesses, low-income and moderate-income individuals and families. Property values and rents continue to rise, and more and more people are finding themselves to be housing-insecure.

The risks for gentrification, displacement, and housing precarity are determined by a variety of demographic and market factors, as well as public and private investments. The Urban Displacement Project (UDP) has researched and identified key factors that contribute to these risks. Their Housing Precarity Risk Model (HPRM) geospatially represents and ranks these risks based on data at the Census tract level. We used these tools in combination with Census data to map current conditions for risk factors including: household income, race and ethnicity, college degree attainment, housing cost-burden, overcrowding, household size, family and non-family households, median gross rent, median home value, change in housing units, percentage renters versus homeowners, and housing vacancy rates. Current and future city parks, as well as transportation developments and infrastructure, were also examined and considered an influence on property values leading to gentrification and displacement risk. Based on these assessments of risk, we chose 14 neighborhoods in which to focus our studies. The neighborhoods of our study include: Greater Avenues, Capitol Hill, Rose Park, Fairpark, Westpointe, Jordan Meadows, Poplar Grove, Glendale, Downtown, Ballpark/Midtown, Liberty Wells, Central City, East Central, and Central Ninth. These neighborhoods are either currently experiencing gentrification and displacement, or they are at risk based on demographics, investments, or spillover from adjacent neighborhoods under higher pressure.

Salt Lake City does have a handful of strategies related to displacement mitigation and housing affordability that have been used frequently. There are several more that are in the

pilot or drafting stages, and therefore have not realized their full potential. The most utilized strategies involve the allocation of federal and state funds towards the production of new affordable housing. To a lesser degree, there is also funding going towards some property owners for building maintenance, and towards some renters for rent assistance. There is typically little political pushback in regards to receiving and distributing funding for these causes. However, funds are limited, and affordable housing has historically been concentrated in some neighborhoods due to resistance by others. New policies are needed to guide the production, preservation, and protections for residents and their housing. Some current strategies, such as TSA zoning, Community Land Trusts, ADU ordinances, reduced minimum parking requirements, form-based code, and others, are relatively new and underutilized, or have minimal effects. These strategies generally have a passive approach to affordable housing, offering incentives or allowances rather than requirements. Some of these strategies are also linked to zoning and only cover small portions of the city.

In order to better understand what residents are seeing, experiencing, and feeling about the housing market in Salt Lake City, our class conducted a short survey that was made available online, posted throughout neighborhoods, and collected by students through conversations with residents within their neighborhoods. The demographics of our survey respondents reflect the demographics of the city as a whole. We found that a significant number of residents are concerned about gentrification and displacement in Salt Lake City, and have either experienced some level of housing precarity, gentrification, or displacement themselves, or know someone that has. They want to see actions taken by the city to preserve existing affordable housing, to protect residents, and to produce new affordable housing.

In an effort to directly address these issues and concerns, the end of this document outlines anti-displacement strategies that we believe are particularly well-suited to the current market and demographic conditions of Salt Lake City. We consider these strategies with social, political, financial, and other resource constraints in mind. Our list includes community ownership opportunities and wealth-building, incentives and zoning for affordable housing production, renter assistance and rights, tax-related strategies, and others. We believe that these tools and policies could be implemented with broad support, under a short timeframe, and at minimal expense, and could provide significant positive impacts to our residents and the future of Salt Lake City.

EVALUATING DISPLACEMENT RISK

EVALUATING DISPLACEMENT RISK

The first phase of this project focused on evaluating displacement risk in Salt Lake City, based on the Urban Displacement Project's Housing Precarity Risk Model tools, U.S. Census Bureau tract data, and current and future public and private investments. Based on the information we gathered, 14 neighborhoods were identified as at a higher risk for displacement or gentrification in the city: Ballpark, Capitol Hill, Central 9th, Central City, Downtown, East Central, Fairpark, Glendale, Greater Avenues, Jordan Meadows, Liberty Wells, Poplar Grove, Rose Park and Westpointe.

Below are several key takeaways from the first phase of project work, as well as several maps created during this project that visualize key data points.

Takeaways:

Gentrification pressures move geographically across the city

Evidence found in our research suggests gentrification moves geographically, starting from areas that are in advanced stages of gentrification and spilling over into nearby neighborhoods. For example, gentrification pressures that started from Sugar House, a highly desirable neighborhood of the city that has already gentrified, are spilling over into nearby neighborhoods, such as Liberty Wells and Ballpark. The same is happening with gentrification pressures from Downtown spilling over into Rose Park. As places like Sugar House and Downtown continue gentrifying, people who can't find housing in those areas may look for housing in those other bordering neighborhoods.

Many people are overburdened by housing costs in Salt Lake City

Most of the 14 neighborhoods studied in this report have a large share of residents who are spending 30% or more of their household income per month on rent or a mortgage (see map below). People who spend over 30% of their income on housing are considered to be overburdened by housing costs. Almost all of the neighborhoods studied in this project have at least 10% of their residents spending over 30% of their income on housing, and some neighborhoods have as much as 40% of residents being overburdened by housing. It's worth noting that this data may be outdated, as housing prices have only continued to rise over the past several years, so the amount of people overburdened by housing costs in these neighborhoods is likely higher than reflected in our data.

Freeways divide east from west

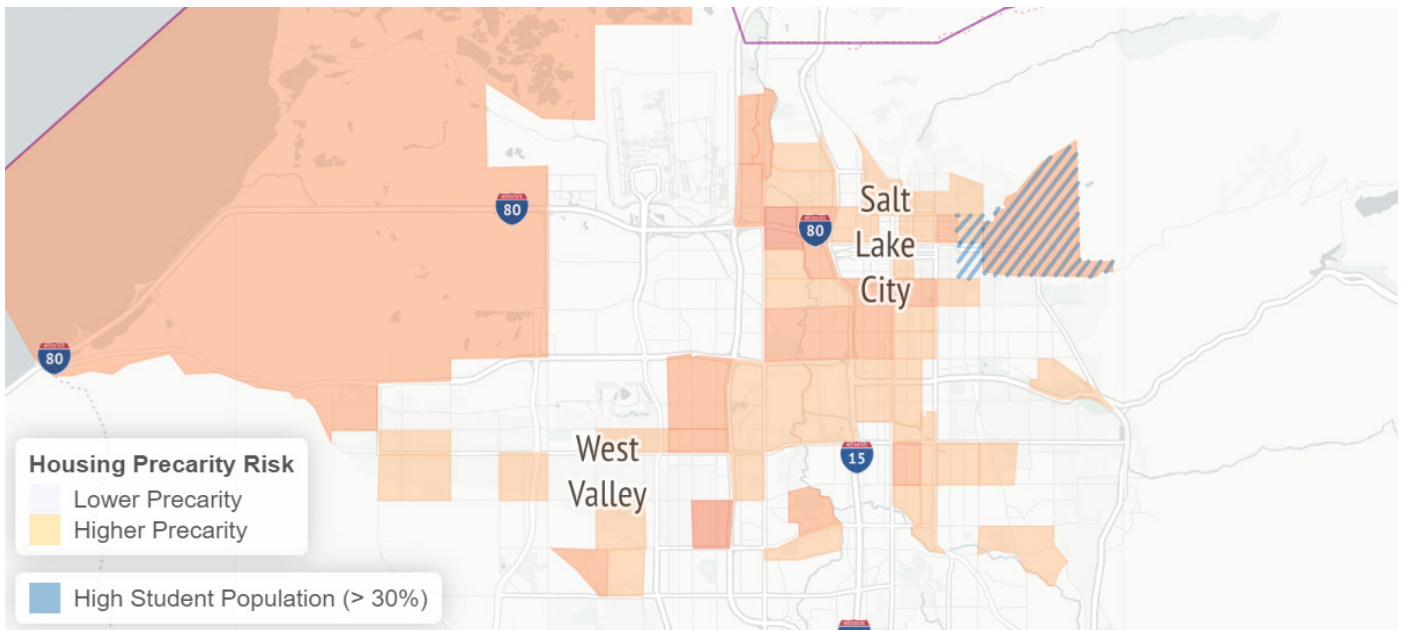
Many neighborhoods in Salt Lake City have a large amount of lower-income renters. In some areas of the city, residents indicated these renters likely wouldn't have anywhere else to go if they were priced out of their housing. Providing ample housing for this demographic in the form of affordable rental units is important to prevent these residents from being displaced from their neighborhoods. I-15 is a significant cultural and geographic barrier that separates the west side of Salt Lake City from the east. The divisions are becoming less problematic, especially as Salt Lake City continues to extend public transit lines and other public services into the west side. However, there is still a lack of public investment and attention on the west side of the freeway compared to the east, and there are fewer amenities and public services on the west side. As investments do begin to flow into the west side, as we are seeing along North Temple, it is imperative that we protect the long-time residents in these areas from displacement and work to minimize gentrification pressures in these areas.

MAPS

The following maps visualize several key data points that are most relevant to evaluating gentrification and displacement risk in the 14 Salt Lake City neighborhoods that were a focus of this study.

The Urban Displacement Project is a research and action initiative of the University of California Berkeley and the University of Toronto. The group's research aims to understand and describe the nature of gentrification, displacement, and exclusion, and also to generate knowledge on how policy interventions and investment can support more equitable development. The UDP has developed, and is in the process of refining, some tools that aim to provide resources for cities looking to address equity and inclusion.

URBAN DISPLACEMENT PROJECT: HOUSING PRECARITY RISK MODEL



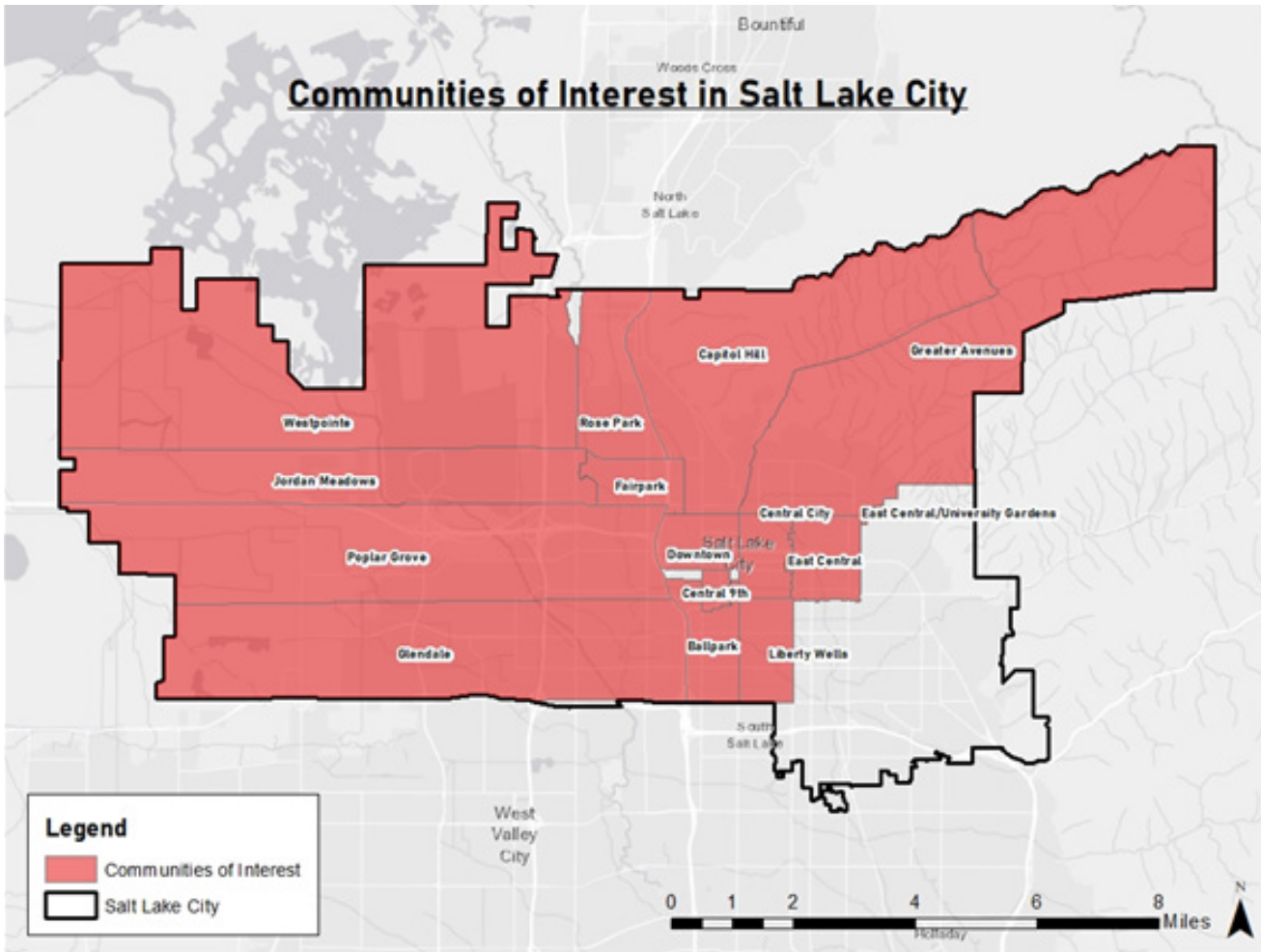
UDP HPRM map of Salt Lake City. Source: Urban Displacement Project.

The Housing Precarity Risk Model (HPRM) considers displacement risks, including risks not dependent on gentrification. This data are shown at the census tract level, and this model's scoring system compares to national trends.

The HPRM identifies multiple variables that predict evictions. With the sum of these values it then categorizes communities into Lower Risk, Higher Risk, and Highest Risk relative to national trends. The HPRM then assigns points to these categories as well as other variables, and the tracts are given a score between 0 and 9.

The darker the orange, the higher the housing precarity risk. The highest scoring tract in SLC has a 5 out of 9 and is located in the Poplar Grove neighborhood. You can also see where high student population rates are taken into consideration.

COMMUNITIES OF INTEREST IN SALT LAKE CITY



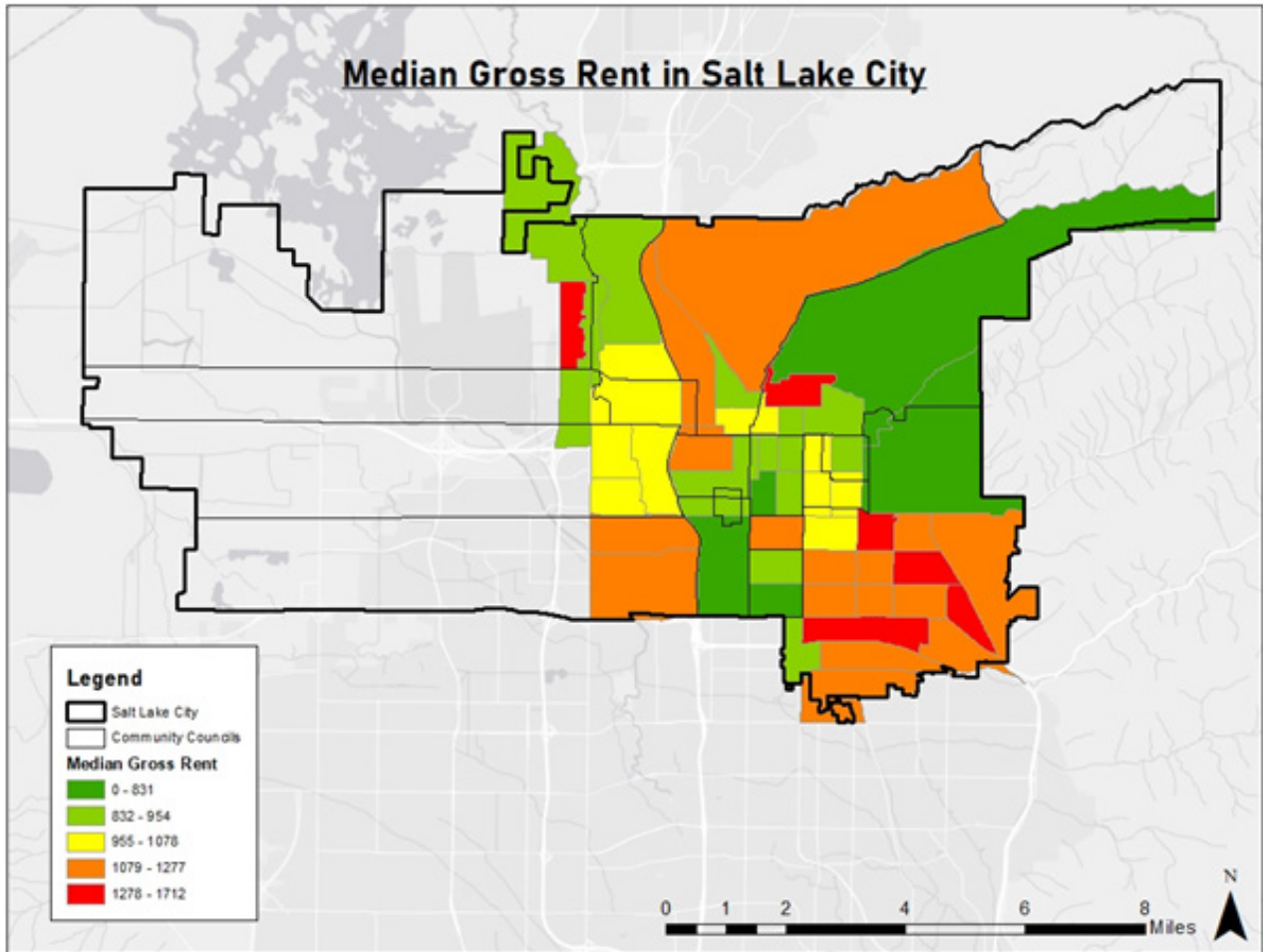
Communities of interest in Salt Lake City. Map created by Plan Making students.

The Urban Displacement Project tools helped to determine which communities were most at risk and led us to focus our studies on these 14 neighborhoods: Ballpark, Capitol Hill, Central 9th, Central City, Downtown, East Central, Fairpark, Glendale, Greater Avenues, Jordan Meadows, Liberty Wells, Poplar Grove, Rose Park and Westpointe.

Percent Households Spending >30% of Income on Rent or Mortgage

In Salt Lake City, the median gross rent is about 27.9 percent of median household income. However, the majority of Salt Lake City neighborhoods have at least 10 percent of households spending 30 percent or more of their income on rent or a mortgage. Areas of Downtown, Central City, East Central, Rose Park and Ballpark have 30 percent or more households who are overburdened with housing costs. Over 40 percent of households near the University of Utah are spending more than 30 percent of their income on housing, but due to the large student population, this can be considered an outlier. Wealthier neighborhoods in the southeast side of the city, which were not a focus of this study, have lower shares of households overburdened with housing costs.

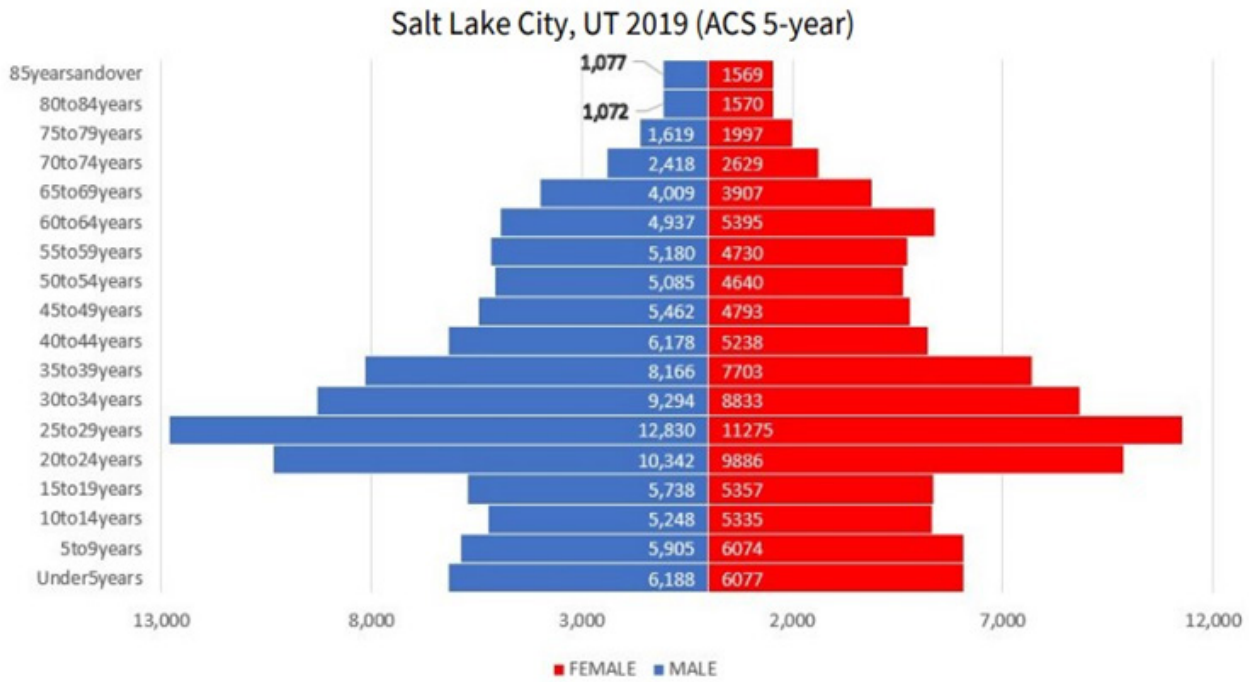
MEDIAN GROSS RENT



Median Gross Rent in Salt Lake City. Source: U.S. Census Bureau 2020 Decennial data.

The Median Gross Rent for Salt Lake City overall is \$985. Ballpark, Liberty Wells and Central City neighborhoods have lower-than-average median rents. Southeast SLC neighborhoods such as Sugar House, Yalecrest and the East Bench, which were not a focus of this study, have higher rents than most of the city. However, rents appear to be rising in west side neighborhoods such as Poplar Grove and Glendale.

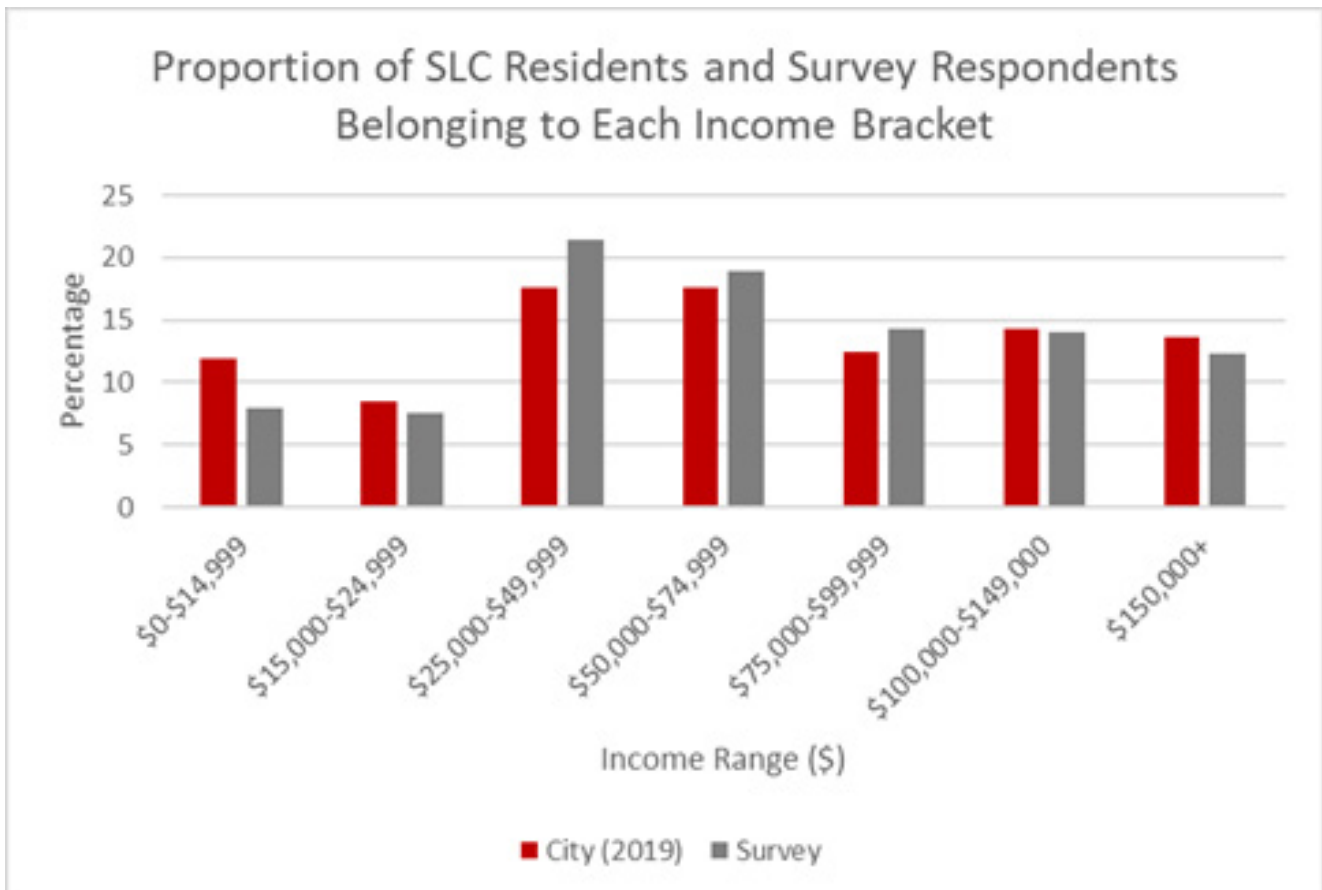
SLC CHANGE IN HOUSING UNITS



Change in Housing Units 2010-2019 in Salt Lake City. Source: U.S. Census Bureau 2010, 2019 ACS 5-year data.

The University of Utah is the area in dark red, showing the most loss in housing units from 2010 to 2019. Other areas experiencing loss in housing units include parts of Sugar House, Wasatch Hollow, Bonneville Hills, Liberty Wells, the lower avenues, and Central City/Liberty Wells. Westpoint, near the airport, has also lost housing units. Other areas in the city have gained hu, but not significantly. THis is very true for westside communities, which have only slightly gained. Places that have dramatically increased housing units include the western most portions of Glendale and Poplar Grove, which has a heavy industrial area. Other places with a lot of change in h.u. Includes Downtown and Ballpark

PERCENTAGE OF RENTER IN SLC CENSUS TRACTS



Percent Renter Households in Salt Lake City. Source: U.S. Census Bureau 2020 Decennial data

The city-wide average percent of renters in individual census tracts is 53.9 percent. There are higher amounts of renters in Ballpark, Downtown and Central City. The University of Utah also has higher shares of renters. There are fewer renters in wealthier areas of the city, including the southeast SLC neighborhoods and the Avenues.

FUTURE PUBLIC INVESTMENTS AND GENTRIFICATION AND DISPLACEMENT RISKS

The city is home to several parks, natural lands and trails, and there are many plans for future parks improvements, trails, and new parks to be added to the city. UTA routes and bicycle infrastructure are also going to see improvements and extensions in the coming years.

Under certain conditions, public investments such as parks, transportation, and housing can serve to contribute to displacement risks. Models based on green space in gentrification-eligible tracts in several US cities by Rigolon and Németh (2020) found that the odds of gentrification in a census tract increase by 222% when within a half mile of a new greenway park. Additionally, parks located near downtown areas as opposed to the city’s periphery also may have a larger impact on gentrification (Rigolon & Németh, 2020).

CURRENT STRATEGIES TO LIMIT DISPLACEMENT IN SLC

INTRODUCTION

Numerous anti-displacement strategies are currently being used throughout Salt Lake City to reduce housing instability and displacement pressures in the face of the city's affordable housing crisis. Although these initiatives have been implemented by a variety of organizations and to varying degrees, they work to address housing stability using three main mechanisms. First, tenant protections stabilize households by shielding renters from displacement pressures like rising rents and evictions. Second, preservation initiatives maintain and rehabilitate existing affordable housing units to prevent displacement. Finally, housing production strategies construct new affordable units and address discrepancies between supply and demand in localities' housing markets. Combined, these three strategy types employ short- and long-term approaches to address issues related to housing instability and displacement in Salt Lake City.

Table 1 outlines existing anti-displacement strategies in Salt Lake City. These strategies are categorized into three main types: funding sources, divisions or organizations, and programs that address housing instability (highlighted in blue, yellow, and orange, respectively). Although the city employs a combination of these strategies, funding is used most frequently. Please see this sheet for the description of all other strategies.

Although a range of anti-displacement strategies are currently used to address Salt Lake City's housing needs, determining how frequently each strategy is used and measuring their impacts is challenging. For one, many of the city's strategies are in the form of funding sources or mechanisms that support anti-displacement efforts financially but are otherwise uninvolved in actions related to housing. Salt Lake City also relies on private and public community organizations (e.g., Utah Center for Neighborhood Stabilization, Community Development Corporation of Utah, Utah Nonprofit Housing Corporation, and other nonprofits) to facilitate anti-displacement activities. While this can expedite displacement mitigation efforts by reducing requirements for political approval, it makes tracking many of the city's anti-displacement efforts more complicated. Some data on current strategies exists and is updated regularly (for example, the city reports on past and current ADU numbers); however, data for most strategies is either not collected or not published.

Overall, the city has been successful at facilitating a diverse array of anti-displacement strategies, in terms of both scope and implementation. For example, offering smaller-scale, individual aid but also funding larger-scale housing development projects is an effective way to address the city's range of housing-related needs. Salt Lake City also offers a variety of non-political strategies to approach gentrification and displacement, reducing procedural speed bumps that can get in the way of solving these problems. Funding tools used to support these strategies have been utilized effectively by the city, too. Although applying for federal and state grants often involves lengthy and confusing processes (typically requiring political approval with public hearings), once these funds are allocated, they can be used without much pushback. Despite these successes, the city must work to provide more accurate data about the scopes and statuses of its anti-displacement strategies. Obtaining data about specific strategies—even large-scale, well-known ones—is extremely challenging, and prevents the public, practitioners, and policymakers from being able to understand their impacts.

Blue = Grants/Funds, **Yellow** = Divisions/Organizations, **Orange** = Program

Table 1. Existing Anti-displacement Strategies in Salt Lake City			
	A. PRESERVE	B. PRODUCE	C. PROTECT
1	<p>HOME Development Fund: The HOME Development Fund is a program offered by Salt Lake City Housing Stability through Federal HOME Investment Partnership Program (HOME) funding to increase affordable housing in Salt Lake City. The funds are eligible uses include rehabilitation, acquisition, and/or new development gap financing for affordable housing in SLC</p>	<p>Low-Income Housing Tax Credit (LIHTC): This program provides state and local LIHTC agencies, like the Utah Housing Corporation, an annual budget to issue tax credits for the acquisition, rehabilitation, or construction of rental housing for lower-income households. These households must earn less than 60% of the area median income (AMI) to qualify for these units. Rents are capped at 30% of AMI.</p>	<p>Housing Trust Funds: The Housing Trust Fund and its advisory board provides assistance for affordable and special housing needs within the city. In addition they may recommend that funds be used for other projects such as emergency home repairs, construction gap financing, etc.</p>
2	<p>Section 8 Housing Choice Vouchers Program: The Section 8 Program, also known as Housing Choice Voucher (HCV) Program, provides rental assistance to help income-eligible persons afford decent and safe housing. Section 8 is a HUD program locally administered by the Housing Authority of Salt Lake City. Participants may choose any housing that meets the requirements of the program.</p>	<p>Section 8 Project-Based Funding: Section 8 Project-Based Funding, a federal Department of Housing and Urban Development (HUD) program, is used to create privately owned and operated rental buildings where recipients of Section 8 Housing Choice Vouchers (HCV) can live. A public housing agency (PHA) can put up to 20% of its HCV units toward a project.</p>	<p>Section 8 Housing Choice Vouchers Program: (See section A2 for more information)</p>
3	<p>Community Land Trust (Deed Restrictions): By placing city-owned property into the Community Land Trust (CLT), home buyers lease</p>	<p>Accessory Dwelling Units (ADUs): ADUs are attached or detached secondary residential units. Because of their small size, they create affordable housing options,</p>	<p>Olene Walker Housing Loan Fund: Through funding and loans, this program supports affordable housing projects identified by the HUD as very</p>

Table 1. Existing Anti-displacement Strategies in Salt Lake City			
	A. PRESERVE	B. PRODUCE	C. PROTECT
	the land the home is built on from the City. Home buyers purchase the home and the improvements. This allows Salt Lake City to preserve the homes affordability into the future while still allowing the buyer to build equity in their home. Keeps the home affordable for future buyers through deed restriction.	however in many neighborhoods they require a conditional use process which can be cumbersome and expensive..	low-income, low-income and moderate-income. Developers who seek loans from this fund also rely heavily on low-income tax credits.
4	Home Repair Program (Low-Interest Loan products): The Home Repair Program allows owner-occupied households with low to moderate income to obtain no and low-interest loans to address health, safety, and structural issues. Very Low Income households can apply for a life-time maximum grant of up to \$50,000 to repair major structural and/or mechanical issues in their home.	TSA Zoning: Transit Station Area Guidelines, “reward high quality, desired development through the use of incentives (such as increased building height) and by allowing for a quicker review process.” Under their Land Use Guidelines, mixed income housing is encouraged in order to provide affordable housing	Community Land Trust: (See section A3 for more information)
5	Olene Walker Housing Loan Fund: See section C3 for more information	HOME Development Fund Program: See section A1 for more information	Home Buyer Program (Welcome Home SLC): Welcome Home SLC" provides low to moderate-income families the opportunity to purchase a home in Salt Lake City. There are two options: 1) Find + Buy and 2) Buy from SLC: Some of these homes may be part of the SLC Community Land Trust to ensure the homes are

Table 1. Existing Anti-displacement Strategies in Salt Lake City			
	A. PRESERVE	B. PRODUCE	C. PROTECT
			affordable and stay affordable even after the home is sold to the next buyer.
6	Home Buyer Program: For more information see section C5	Olene Walker Trust Fund: For more information see section C3	Housing Authority of SLC (HASLC) The Housing Authority of Salt Lake City (HASLC), a federally funded Special Purpose Government Agency that provides rent subsidies and promotes affordable housing for low-income persons residing in Salt Lake City.
7	Form-Based Code: Form based districts are intended to provide zoning regulations that focus on the form of development. Regulations place emphasis on the built environment over land use. Form-based codes can be developed to include various housing affordability tools, such as density bonuses in exchange for the provision of affordable units and accessory dwelling units.	Salt Lake City Redevelopment Agency (RDA): The SLC RDA provides loans and other financial assistance to housing projects that offer some affordable housing, prioritizing “mixed-income” housing. While most RDA funds go into their defined project areas, they also fund projects throughout SLC that meet affordable housing requirements.	Emergency Solutions Grant (ESG) -The Emergency Solutions Grant (ESG) is a Federal grant that was established by the Homeless Housing Act of 1986, in response to the growing issue of homelessness among men, women & children in the Unites States. In 1987, the ESG program was incorporated into subtitle B of title IV of the Mckinney-Vento Homeless Assistance Act (42 U.S.C. 11371-11378)
8	Community Development Block Grant (CDBG): The State of Utah Community Development Block Grant program provides grants to cities of fewer than 50,000 people and counties of fewer than 200,000. The Community Development Block Grant (CDBG) Program provides	Housing Trust Funds: See section C1 for more information	Housing Opportunities for Persons with AIDS (HOPWA) - HOPWA is the only Federal program dedicated to the housing needs of people living with HIV/AIDS. HUD provides grants to local communities, states, and NFP's for projects that benefit low-income persons with HIV/AIDS and their families.

Table 1. Existing Anti-displacement Strategies in Salt Lake City			
	A. PRESERVE	B. PRODUCE	C. PROTECT
	annual grants on a formula basis to states, cities, and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons.		
9	<p>Utah Center for Neighborhood Stabilization: UCNS provides financing, consulting, and capital sourcing to small businesses and affordable housing developers who don't qualify for traditional bank financing or who have a project that doesn't quite fit the traditional banking mold.</p> <p>They have two housing relevant programs: 1) Utah Equitable Transit Oriented Development 2) Affordable Housing</p>	<p>Utah Center for Neighborhood Stabilization (See section A9 for more information.)</p>	<p>Emergency Rental Assistance Program (Temporary): The federal Emergency Rental Assistance Program (ERA) has provided rental assistance to households during the COVID-19 pandemic.</p>
10	<p>Housing Authority of SLC (HASLC): See section C6 for more information</p>	<p>Utah Nonprofit Housing Corporation (UNPHC) See section A11 for more information</p>	<p>Low Income House Tax Credit (LIHTC): See section B1 for more information.</p>
11	<p>Utah Nonprofit Housing Corporation (UNPHC) (funded through HOME?): Utah Non-Profit Housing Corporation (UNPHC) is Utah's largest non-profit developer of affordable</p>	<p>Impact Fee Waivers/Reductions: "To reduce overall costs of new housing, some cities waive or reduce impact fees associated with affordable housing developments" SLC applies this to new affordable</p>	<p>Home Development Fund: see section A1 for more information</p>

Table 1. Existing Anti-displacement Strategies in Salt Lake City			
	A. PRESERVE	B. PRODUCE	C. PROTECT
	<p>multi-family housing. They are a 501(c)3 organization and a Community Housing Development Organization (CHDO).</p>	<p>rental housing (at 60% AMHI), and non rental housing (waived at 80%, reduced at 90% and 100% AMHI)</p>	
1 2	<p>Emergency Solutions Grant Program (ESG): See section C7 for more information</p>	<p>Community Development Block Grants (CDBG): See section A8 for more information</p>	<p>Community Development Corporation of Utah: See section A16 for more information</p>
1 3	<p>Handyman Program: Program that assists aging adults (62 years of age and older) and disabled persons (disabilities under federal guidelines) whose income is below 80% of median income with small household repairs (e.g., weathering, landscaping, plumbing, etc.). The Handyman Program prevents displacement by preserving existing affordable units for at-risk and low-income individuals who may otherwise be forced to relocate.</p>	<p>Tax Increment Financing: "With TIFs, the city freezes the amount of property tax collected for property owners within the TIF district to encourage development in an area. As development grows and property values increase, the property owners still pay the same amount in property taxes to the city with the remaining funds going back into the CRA to fund additional improvements to the area.</p>	<p>Housing Loss Relocation Assistance Program: The purpose of this chapter is to provide relocation assistance to tenants of apartments in the city who are displaced from housing that has been closed by the city. It is in the public interest to reduce the amount of homelessness in the city through such assistance."</p>
1 4	<p>Salt Lake City Targeted Repair Program: "Very Low Income households (50% and under AMI) can apply for a life-time maximum grant of up to \$50,000 to repair major structural and/or mechanical component deficiencies in their home. This grant will allow homeowners, who have no other funding options,</p>	<p>Housing Development Loan Program Policy (HDLP): The HDLP provides low-cost financial assistance to incentivize the development and preservation of affordable housing within Salt Lake City municipal boundaries. While the RDA has been providing affordable housing loans for years, this program is intended to streamline the application</p>	<p>Utah Community Action: Founded in 1965, Utah Community Action is a nationally recognized provider of comprehensive services for income-eligible families. Their services specific to housing include Rent and Deposit Assistance, Landlord-Tenet Mediation, Home Weatherization assistance, and Utility Bill Assistance</p>

Table 1. Existing Anti-displacement Strategies in Salt Lake City			
	A. PRESERVE	B. PRODUCE	C. PROTECT
	access the funds needed to keep their homes accessible, habitable and safe."	and approval process and better target resources to needs within the community.	
1 5	Project Based Section 8: (See section B4 for more information)	Form-Based Code: See section A7 for more information	
1 6	Community Development Corporation of Utah: Provides homeowner education, down payment assistance, real estate representation and financing. 501(c)(3) non profit. Build new single and multi-family housing, rehabs existing housing stock. Partnership with HUD, one of only five organizations in the nation to administer the Asset Control Area (ACA) program.	Down payment assistance: Designed to assist low-to-moderate income households to help cover down payment or closing costs on purchase of a home. There are various requirements that have to be met to qualify, most of which are defined by HUD. In SLC the Community Development Corporation of Utah offers this as well as the Utah Housing Cooperation	
1 7	Asset Control Area (ACA) program: Through ACA, the CDCU purchase all HUD-foreclosed homes that fall in critical revitalization areas in Salt Lake and parts of Davis County. Rehab the homes and resell them at or below market value to income-eligible families.	Wasatch Brownfield Coalition: Through funds gained by the EPA, this program offers various loan properties and loan grants. The funds must go towards projects that focus on "brownfields" which involve contaminated lands, pollutants, contaminants etc. This is a program partner of the SLC RDA, but operates separately, and services the whole county and the city of Ogden. Funds are specifically reserved for housing, can be	

Table 1. Existing Anti-displacement Strategies in Salt Lake City			
	A. PRESERVE	B. PRODUCE	C. PROTECT
		utilized by private and non-profits for various projects.	
18	Utah Housing Authority: See section C14 for more information	Community Development Corporation of Utah: See section A17 for more information	
19		Land discounts: Provide gap financing, loans and other incentives to include affordable units in mixed housing developments. Target development for household at 0-60% AMI through the City's Housing Trust Fund."	
20		<u>Utah Housing Corporation (UHC):</u> Utah Housing Corporation (UHC) was created in 1975 by Utah legislation to serve a public purpose in creating an adequate supply of money with which mortgage loans at reasonable interest rates could be made to help provide affordable housing for low and moderate income persons.	
21		<u>Utah Equitable Transit Oriented Development (UETOD) Fund:</u> A financing tool for affordable housing developers during the acquisition, pre-development and construction phases of multi-family housing projects located within a ½ mile of public transit stop.	

COMMUNITY ENGAGEMENT RESULTS OF SURVEYS WITH RESIDENTS

SURVEY DEMOGRAPHICS VS. CITY DEMOGRAPHICS

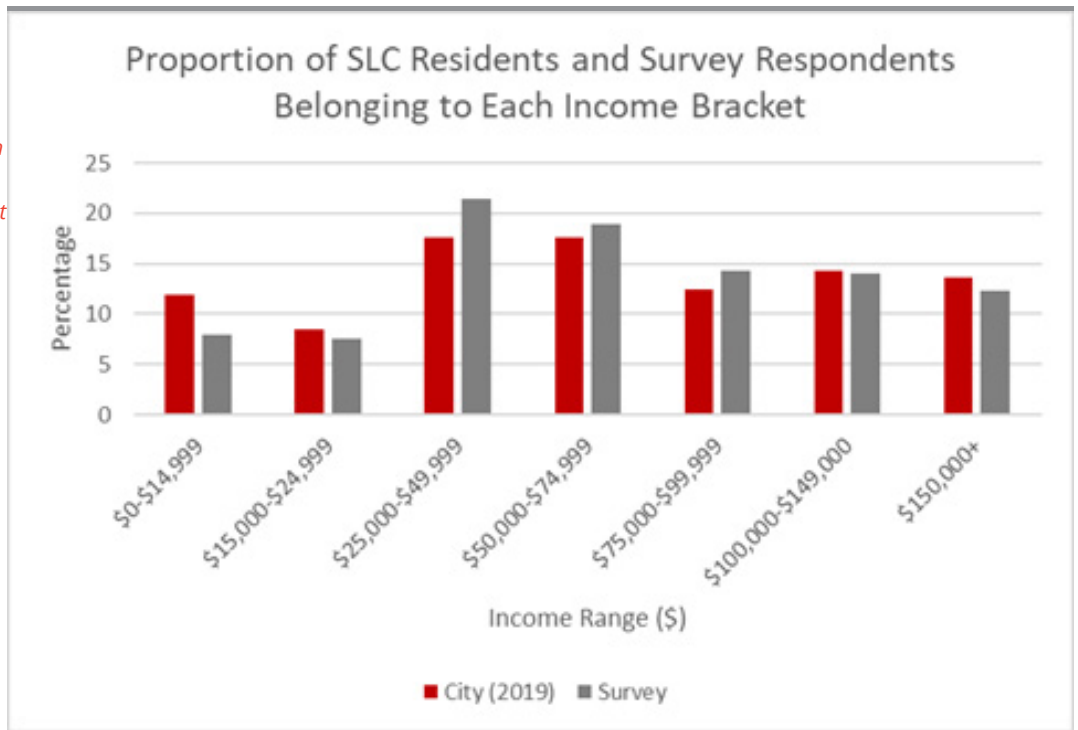
The demographics of the survey respondents generally lined up with Salt Lake City's demographics, though there were some key differences as will be outlined below. For starters with respect to race, the survey respondents were very representative of the city. According to the 2015-2019 five year ACS data, 70% of Salt Lake City was white, a 3% decrease from the 2010-2014 period. Assuming that this trend continued, then our survey respondents closely match with this, with 63% of survey respondents identifying as white. Meanwhile with respect to ethnicity, 21.9% of residents identified as Latino in the 2015-2019 ACS survey, while 16.8% of survey respondents did so, meaning Latinos were slightly underrepresented in the survey results. Other minority groups were represented roughly equally to their overall population proportions.

With regards to gender, females were somewhat overrepresented as they comprised 54.9% of the survey respondents, while males were underrepresented as they were only 36.9% of the respondents. Age demographics tended to match well with the city's overall age demographics which is addressed in the population pyramid presented in as part of our question six analysis. 22-30 year olds represented the largest age group, which corresponds with the 20-24 and 25-29 age groups being the largest in Salt Lake City according to the 2015-2019 ACS five year data. Finally, income data closely tracked with 2015-2019 ACS five year data, with the only minor discrepancies being that the lowest income group, those making less than \$15,000 a year were slightly underrepresented and one of the middle income groups, those making between \$25,000 and \$49,999 were slightly overrepresented.

Key Takeaways:

Overall, a vast majority of respondents indicated some degree of concern about gentrification and displacement in Salt Lake City. Residents are evenly divided about prioritizing protect, produce, or preserve strategies.

Respondents' experiences with gentrification and displacement have been quite varied in the manner in which they have experienced those processes. Demographic and income data of the respondents generally mirrored the city as a whole. A majority of residents expressed a desire to see more housing for low and moderate-income households.



ANALYSIS OF SURVEY RESULTS

There was no significant difference in descriptive statistics between the SLC group and all-samples group that included external regions and SLC, and most of the results were similar. It is clear that there is a high degree of concern about displacement and gentrification in all samples and SLC, with respondents indicating they had serious concern about displacement (5: about 30% in both). Nearly 60% of respondents indicated that they are either “quite” or “very” concerned about displacement, suggesting this is on the minds of a lot of Salt Lake’s residents. If one includes those who indicated that they are “moderately” concerned, the number increases to 80%. Based on this data we can infer that housing challenges in Salt Lake City are of concern for a vast majority of the city’s residents.

A close look at the demographic data also reveals some interesting, if not entirely surprising, trends. Renters showed the highest concern about displacement while homeowners showed the lowest displacement concern, which is not surprising given that renters are at greater risk in a volatile housing market. Meanwhile respondents aged 61 and older also showed the highest displacement concern, which again is not unexpected (though it is still concerning) given that many of them likely have greater risk factors for being displaced such as living on a fixed income. Finally, when it came to racial breakdown of displacement concern, Native Hawaiian/ Pacific Islanders and whites showed the highest displacement concern while American Indians and Asians showed the lowest.

When asked in what ways they had experienced gentrification and displacement, nearly 47% of respondents said they knew someone who had moved because they were evicted or couldn’t afford to live in the city any longer. Another 40% indicated they would like to buy a house but couldn’t afford one and because

of that they would likely move away. Finally the third most frequent response was “My neighborhood is already gentrified” which was chosen by 38% of the respondents. This data indicates that residents’ experience with gentrification and displacement has been quite varied and no one characteristic of these processes dominates residents’ experience with them. It also suggests that crafting a policy to deal with gentrification and displacement will be challenging, though far from impossible, because policy makers cannot simply focus on one aspect of the housing crisis, such as trying to make houses more affordable to buy. Challenges related to rent and evictions will have to be dealt with in equal measure as those relating to buying a home. A closer look at the demographic data relating to gentrification and displacement also unveils some interesting trends. This was especially true when looking at age, where the 22-30 age group showed a much higher propensity for experiencing gentrification and displacement in a myriad of ways with respondents in this age group reporting more experience with five of the options listed for this question. Given that this is the largest age group in Salt Lake City (figure 1), and that many people in this age group are beginning careers and/or undergoing the process of becoming independent adults, it would make sense that they have experienced more of the volatility associated with gentrification and displacement. Another striking fact is that many racial minorities reported more frequently that they knew someone who was evicted or couldn’t afford to live here in Salt Lake City any longer than whites, which does line up with the fact that racial minorities tend to live in higher concentrations in neighborhoods that are at greater risk of displacement. Finally, Black and white residents both indicated at a higher rate than other groups that they wanted to buy a house but can’t afford one and because of that they will likely move away.

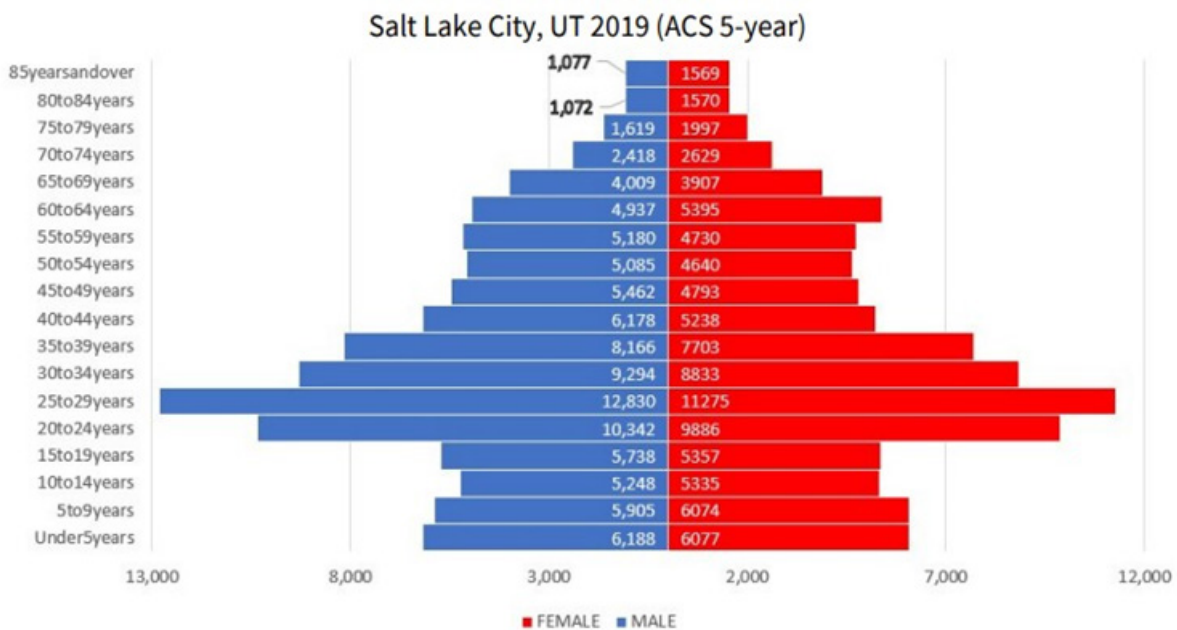


Figure 1. Population by age group, indicating that 20-somethings are the largest age group in Salt Lake City based on ACS 5-year data. This group experiences some of the most precarity and displacement in the City due to low incomes and housing unaffordability, which may force them to seek opportunities elsewhere. Source: Novinska-Lois, 2021.

At about 76 percent of all responses, residents throughout Salt Lake City overwhelmingly indicated that there is currently “Not enough affordable housing for low- and moderate-income people”. The second highest response for this question fell under “Higher income people moving into the area” at roughly 62 percent. A substantial number of respondents indicated that “new developments” and a paucity of “affordable housing for families” as other forces that are exacerbating gentrification and displacement in Salt Lake City, at about 43 and 42 percent, respectively.

Related to these results were responses to question four of the survey, which addressed residents’ experiences with gentrification and displacement. Results showed lower income respondents had more diverse and numerous experiences with gentrification and displacement across the board than higher income respondents. This is a reasonable result to expect, as lower income households may have more [financially] precarious living situations. Another result from this question indicated that more female respondents live in a currently gentrifying neighborhood and “know people who moved because they were evicted or couldn’t afford to be here any longer”. This result may be indicative of this demographic (female), who are more likely to earn less than men in the workplace, thereby limiting their chances at experiencing housing stability or being able to enter or remain in up-and-coming or expensive housing markets. This is also supported by the results along strictly economic metrics. Among income brackets in Salt Lake City, households who earn \$25,000 to \$49,999 were shown to have the highest concern for displacement, whereas households who earn \$100,000 to \$149,999 were shown to have the least concern for displacement. Additionally, respondents who earn \$0 to \$14,999 also showed low levels of concern for displacement, which may be indicative of these earners who are typically adolescents or students living with family.

When asked what they would like to see more of in their neighborhood, Salt Lake City residents indicated that they would like to first see more affordable housing for low- and moderate-income earners at just over 63 percent of all responses. Following this, residents of Salt Lake City would then like to see a wider selection of housing options (roughly 42 percent) and an expansion of services for people experiencing housing instability or homelessness (roughly 32 percent). These results are telling, as they indicate a broad and deep concern at the current lack of housing options that are affordable to households that aren’t considered “high-income”.

These results are supported by other responses to this survey question. The selection of “I cannot afford my housing and am looking to move” was shown to be the highest displacement concern, whereas “I am able to afford my housing” appeared to be the lowest displacement concern across responses in Salt Lake City.

Question eight of the survey pertained to ranking actions the city should take to effectively mitigate gentrification and displacement. Respondents could rank the actions “preserve, produce, or protect” in order of importance, where their just ranked choice was the most important in their view. Results from the survey seem to indicate a somewhat equal distribution of these choices: Produce more affordable housing (37.3 percent), preserve affordable housing (29.4 percent), and protect affordable housing (28.5 percent). As it appears that respondents to this survey do not seem to prefer one affordable housing action over another, Salt Lake City may want to develop a diverse, wide-ranging strategy to mitigate this crisis.

ANTI-DISPLACEMENT FRAMEWORK FOR SLC

OVERVIEW OF POSSIBLE STRATEGIES

At the beginning stages of developing a set of strategies that the city should adopt to limit gentrification and displacement, the class looked at overlaps between neighborhood situations and needs. As shown in the table below, the class as a whole proposed thirty different anti-displacement strategies to determine overlaps between neighborhood situations and conditions. Of the thirty strategies proposed, they were categorized into seven general types. The categories include Community ownership (10), Incentives (3), Zoning for production (6), Renter help (6), Right to return (1), Tax related (2), and Miscellaneous (2).

The proposed strategies were chosen based on the assessments of gentrification and displacement risk in the 14 neighborhoods this study focused on. The assessments of each neighborhood were coordinated by the assigned groups for each area. Assigned groups examined citywide survey results, previously analyzed work on gentrification and risk displacement, previous success of strategies in other settings, compatibility with State statutes, need for political approval, the anticipated impact of strategy, and cost-effectiveness. Based on these criteria, groups determined which strategies would best fit their assigned neighborhood.

Strategy	Anti-Displacement Strategies		
	General Type	Protect, Preserve, or Produce Framework	Community Council Group
Adaptive reuse for affordable housing	Community ownership	Preserve / Produce	Ballpark
Rent building acquisition	Community ownership	Preserve	Poplar Grove
Cooperative housing	Community ownership	Produce / Preserve	Central City
Limited equity cooperatives	Community ownership	Produce / Preserve	Central 9th
Right of first refusal	Community ownership	Preserve	East Central
Tenant opportunity to purchase	Community ownership	Preserve	Capitol Hill
Foreclosure auction modifications	Community ownership	Preserve	Rose Park
Community land bank	Community ownership	Produce	Jordan Meadows
Brownfield Redevelopment	Community ownership	Produce	Poplar Grove
Public-private partnerships to create affordable housing	Community ownership	Produce	Central 9th
Affordable housing overlay	Incentives	Produce	Avenues / Ballpark Fairpark / Glendale
Density bonus	Incentives	Produce	Avenues / Downtown East Central / Liberty Wells
Affordable unit subsidies	Incentives	Produce	Capitol Hill
Basement ADUs with financial incentives	Zoning for production	Produce	Avenues
Changes to ADU ordinance to remove barriers	Zoning for production	Produce	Westpointe
Internal ADUs (STR limitations)	Zoning for production	Produce	Liberty Wells
Reduced parking minimums and maximums	Zoning for production	Produce	Downtown
Residential infill project	Zoning for production	Produce	Downtown
Missing middle housing code updates	Zoning for production	Produce	East Central
Emergency rental assistance	Renter help	Protect	Capitol Hill
Rent assistance	Renter help	Protect	Fairpark / Glendale Liberty Wells
Housing vouchers / Rent assistance program	Renter help	Protect	Westpointe
Just cause eviction	Renter help	Protect	Jordan Meadows Poplar Grove
Tenant right to counsel	Renter help	Protect	Central City / Rose Park
Referral system to improve access to housing programs	Renter help	Protect	Glendale
Right to return	Right to return	Protect	Ballpark / Fairpark
Real estate transfer tax	Tax related	Produce	Rose Park
Historic rehabilitation tax credits paired with LIHTC	Tax related	Produce / Preserve	Central City
Homeowner assistance programs	Miscellaneous	Preserve	Westpointe
Short-term rentals restrictions	Miscellaneous	Preserve	Central 9th

Tenant Opportunity to Purchase

Tenant Opportunity to Purchase (TOPA) policies require advance notice of a landlord selling their multi-family building so tenants have the opportunity to collectively purchase the building. TOPA is a powerful tool for tenants because it gives them the option to participate in the sale of their homes. First, the landlords are required to provide an intent to sell notice and there is a specific timeframe for forming a tenant association and expressing interest in buying the building. Tenants then have another set amount of time to secure financing. Community-based organizations can be a good resource to the tenants in providing education and organizing support throughout the process. The policies within TOPA would outline guidelines for the timeframes and would be provided in writing. Typically, the notice periods can be anywhere from a few months to several years. Once purchased, tenants have a democratic say in how their building is managed and are able to address repairs, maintenance, and renovations in the way they want. TOPA policies help to "...level the playing field in highly speculative markets" by giving renters the opportunity to negotiate and bargain to purchase their buildings (All-In Cities, n.d.).

TOPA was first used in Washington D.C. as part of the Rental Housing Conversion and Sales Act of 1980. This act had eight purposes, some of which purposes were to encourage the formation of tenant organizations, give tenants a bargaining position to purchase property (thereby discouraging their displacement), preserve low rental housing, prevent lower-income seniors and people with disabilities from being displaced, and provide relocation assistance (O'Toole and Jones, 2009). Between 2002 to 2013, almost 1,400 affordable units have been preserved because of Washington D.C.'s TOPA act.

Along with TOPA cities might develop a Community Opportunity to Purchase Act (COPA) to work alongside TOPA or as its own standalone policy. When a property owner decides to sell, COPA allows nonprofits to make the first offer on a building that has low-income tenants. With TOPA tenants negotiate the sale directly or can assign that right to another entity. With COPA the rights to negotiation are handled by qualified nonprofits. There are many variables that will determine which policy is better for any given area. Some of those include "...policy goals, market conditions, the capacity of local housing nonprofits, availability of funding and financing, and capacity for tenant organizing and education" (All-In Cities, n.d.).

Cities would need to have staff to outline enforcement mechanisms to implement TOPA/COPA policies. Outreach and education would be vital to the success of TOPA/COPA. Tenants would require outreach, information, and resources to learn about TOPA/COPA programs and be able to make educated decisions. As part of this, cities would need to have enough funding to provide technical assistance, which includes legal counsel and representation. In both Washington D.C. and San Francisco, nonprofits or housing trusts are involved in these processes to varying degrees to help guide and inform tenants. In San Francisco, the city allocated nearly \$3 million to help build the capacity of nonprofits for these efforts. MEDA and other nonprofits are helping to provide models and toolkits for more nonprofits to be part of COPA. Johnny Oliver suggests that prioritization of preservation funding and building the capacity of local nonprofits to receive assets are important elements in COPA to keep the program successful in the following years. Utah would have much to gain from the lessons Washington D.C. and San Francisco have learned about these policies.

Cooperative ownership

Cooperative ownership is not currently utilized in Salt Lake City, and was chosen in part due to its unique approach. This strategy does not depend on political approval for implementation, but does require large amounts of money to get started. While Salt Lake's demand is currently higher than the housing supply, there are opportunities for dense developments within the urban core, especially around Central 9th and Granary District.

Co-ops can be structured within new or older buildings, and can be set up in many forms of housing. Cooperative housing is a homeownership model in which the residents purchase shares of stock in a building rather than owning real property, as one does in a condominium or townhome. They can be run as market rate, limited-equity, or zero-equity models. While cooperatives are most commonly created by nonprofits with the help of federal subsidies, local governments can aid through public financing, property tax breaks, and allowing for rights of first refusal. This strategy can be used in multifamily buildings such as condos, townhomes, or even single family homes. The development itself may be redeveloped by a nonprofit or converted by existing rental tenants. In order for the development to remain permanently affordable, a community land trust must be facilitated for the site. Conversely, the units could be affordable for a period determined by a low-interest loan, such as a 30 or 40-year mortgage from HUD.

Due to the nature of these developments, with ownership over the whole building rather than one unit, residents are equally authoritative, and may have more responsibilities than in a standard condominium. Monthly membership fees and mortgage payments are required of all residents, which may limit how low the residents' income can be. While targeting low-income individuals, cooperatives are exclusionary in this regard. They also require high levels of engagement with other tenants and cooperation in management. This in turn fosters a sense of community, along with restrictions on subleases and owner-occupied, full-time residency is often required. A negative side effect of these developments' strong collaboration is if one resident is unable to pay their monthly share, the cost burden is passed to other tenants.

Thriving in Salt Lake City

The cooperative housing strategy is one that fits with Salt Lake City's housing type and current 'hot' housing market. Salt Lake City's substantial growth in apartments and condos suits the demand for this type of housing. This provides the opportunity for either a nonprofit to purchase an existing development, build a new one, or for current tenants to purchase a property when it is put up for sale. This step, however, requires that the local government has legalized the right of first refusal, allowing for existing tenants to make a first bid. As of now, right of first refusal is not required in Salt Lake City. This would impact tenants' ability to purchase a development. Due to tenant-derived ownership not being necessary for a cooperative however, right of first refusal is not a deal breaker for this strategy.

Salt Lake City has policies that would allow for housing cooperatives, but it would not be an easy process. These policies needed at the local scale include right of first refusal, public financing through local housing departments, property tax breaks, and support for nonprofit partners. Salt Lake City does have public financing for affordable housing projects, including SLC's Housing Stability and HUD's HOME Investment Partnership Program, and the Olene Walker Housing Loan Fund. Financial incentives Salt Lake City provides include tax increment financing, reducing development fees for affordable housing, and fast-track permitting processes. Tax abatement for developers of Affordable Housing is currently illegal in Utah, but may become a strategy pursued in the future. While many of the strategies that would make the implementation of cooperative housing easier require political approval, the strategy itself would not.

The best way forward for the implementation of this strategy in Salt Lake would be for a nonprofit to step into the role of facilitator, manager, and acquirer of these developments. With a nonprofit specializing in this form of housing, prospective residents would not need to have the time, grant-writing, or financial knowledge of how to create and manage a cooperative. The nonprofit could establish itself and build up its understanding of what this housing type needs. There are various nonprofits that assist or focus on affordable housing, but none that specialize in cooperative housing. A few that could make the transition include the Utah Nonprofit Housing Corporation and Community Development Corporation of Utah. The Community Land Trust that Salt Lake City operates could be expanded to include these properties, or they could remain in the ownership of the nonprofit.

Adaptive Reuse/Redevelopment

Adaptive reuse as a unique, affordable housing strategy has been implemented successfully across the country through several implementation methods and scales. The principle behind adaptive reuse for affordable housing is that there are specific benefits to using existing structures as part of the housing affordability crisis. As part of affordable housing efforts, cities have used various methods to incorporate building preservation and renovation. Through adaptive reuse, cities can directly purchase existing structures (and convert them into affordable housing or homeless shelters); or cities can legislate, incentivize, or partner with private developers to do the same. Several cities in the country have established adaptive reuse ordinances (ARO) that seek to offer development incentives and alternative building and fire standards for projects that repurpose existing structures. ARO incentives have caused developers to reutilize vacant or underutilized buildings for housing in Los Angeles, Santa Ana, Phoenix, Seattle, and Corpus Christi.

Adaptive reuse projects can be cheaper than the cost of demolition and new construction, although admittedly, that depends on several factors. Existing structures require fewer new materials, meaning it may be particularly advantageous to remodel when construction materials and labor are experiencing shortages such as those caused by the COVID-19 pandemic. When historically significant buildings are targeted, additional funding opportunities include the Utah Historic Preservation Tax Credit and Federal Historic Preservation Tax Incentives. Additionally, government resources can provide additional guidance to these special construction projects. Other benefits to this focused approach to public and public-supported housing are significant energy and greenhouse emissions savings. According to the EPA, as of 2018, construction and demolition debris accounted for 600 million tons of waste in the United States, with demolition making up 90% of that total. Demolition has a significant environmental impact as these materials take up valuable landfill space, and reusing materials and structures "offset[s] the environmental impact associated with the extraction and consumption of virgin resources and production of new materials" (U.S. Environmental Protection Agency, 2020).

Salt Lake City is currently developing an adaptive reuse ordinance to facilitate the repurposing of existing vacant or underutilized structures. According to the department, "an adaptive reuse ordinance incentivizes the reuse of existing buildings by modifying some zoning regulations when those regulations prohibit a change of use" (Salt Lake City, 2022). The city should look to success from other AROs and incorporate the specific standards and incentives that work directly toward solving the affordable housing crisis. For example, Santa Ana's ordinance only qualifies for projects converted into residential use, and the incentives include being able to develop residential uses for adaptive reuse projects regardless of the base zoning type. Additionally, allowing the existing structure's height or density may create additional incentives for developers. Developing and implementing the ARO in Salt Lake would be a legislative action with few direct costs to the city. Another way for adaptive reuse to be utilized in the city would be for the Redevelopment Agency of Salt Lake City to actively focus on repurposing structures rather than just new developments. There are potentially high cost and environmental benefits to this approach. While the RDA's work uses public funds, the agency's actions are typically administrative unless there are budgetary concerns that require

Thriving in Salt Lake City

city council action. If the city were to redevelop blighted neighborhood structures, it might gain neighborhood support for RDA projects. This strategy was prioritized due to its ease of implementation in Salt Lake City and Utah's existing political climates, as well as its environmental benefits and ability to produce affordable housing. Regarding related strategies, one of the essential requirements for right to return policies is that there must be enough affordable rental housing units for previously displaced residents to return to. For this reason, affordable housing overlay zoning districts, which facilitate the creation of more affordable housing units, work well in conjunction with right to return policies. Similarly, adaptive reuse strategies for affordable housing also help create more affordable units in areas that need them, so adaptive reuse also works well with right to return policies. Adaptive reuse ordinances can act independently of right to return and TSA zoning policies.

Density Bonus

The density bonus policy has been observed to be specifically effective in markets with strong demand for housing units with limitations on land availability. The effectiveness of this policy also highly depends on the variation of construction costs and housing rent in the housing market (Source: Local Housing Solutions). Having said that, there has been a somewhat wide use of density bonuses in diverse contexts and at various geographical levels such as Montgomery County (MD), City of Madison (WI), Arlington County (VA), and the State of California. The State of California under the Density Bonus Law (found in California Government Code Sections 65915 – 65918) mandates all local governments within its boundary to incentivize density bonus or other concessions, if requested, for developments of five or more units with minimum affordable or subsidized units (Source: Housing Development Toolkit, Guide to the California Density Bonus Law). Similarly, under the Moderately Priced Dwelling Unit program, Montgomery County, MD requires 12.5 percent of all new residential units to be affordable and encourages additional subsidized residential units using a density bonus which enables developers to build up to 22 percent more than the base density allowed by zoning. Arlington County under its Zoning Ordinance Section 15.5.9 has a provision of additional building height or residential density for any market rate or affordable housing development that fulfills the criteria (Source: Arlington County). The city of Madison, WI has implemented a point and criteria-based density bonus program for housing development projects with at least 15 percent affordable units. For each criterion fulfilled, the developers earn up to three points which convert to 10-20 percent more permitted housing units. The city also provides a pre-application review process and policy manual to facilitate compliance with the ordinance. Although these implementation of density bonuses vary at various geographical scale, context and size of urban centers, and political environment, it can be derived that density bonus has been an increasingly implemented tool for housing development to keep up with housing market demand and not just affordable or middle-income housing demand.

Two Utah municipalities have language within their planning code that discusses density bonuses. In Murray City, UT, developments must meet criteria that qualify them for a density bonus (Murray City Code). The affordable housing discussed requires 20% of units to be made available to those earning 80% or less than the AMI for 25 years per unit per acre increase. Each incremental increase results in reserving 20% who make less and less. A two-unit increase results in 20% of units being made available to those earning 60% or less than the AMI for 25 years. If a third unit is added, this results in 20% being made available to those earning 60% less than the AMI for 50 years. The other criteria that developers are required to meet are more aesthetic. Landscaping, building quality, and amenities result from more density. Parking is determined to be one stall per unit. Parking is a major hindrance to affordable housing and is often reflected in the rental rates. Salt Lake City is presently considering a variant application of a density bonus through a zoning text amendment. For multi-family and mixed-use zoning districts, additional height of one to three stories (depending relatively on zoning) will be allowed if 20% of units are restricted to those with incomes at or below 80% AMI, 10% of units are restricted to those with incomes at or below 60% AMI, or 10% of units are restricted to those with incomes at or below 80% AMI when units have two or more bedrooms. An essential issue with this prospective policy's application in this context is its relative lack of aggressiveness and flexibility. With mind to the fairly liberal pre-existing restrictions enforced by zoning in Downtown, Central City, and Central 9th already allowing relatively large structure heights and comparatively heavy utilizations of site areas, greater incentives for relatively larger increases in density seem appropriate where the goal is to maximize proportions of affordable housing developed and generally increase housing density. In the great number of other SLC neighborhoods where parcels are zoned primarily for Single-family residential and partially Multi-family residential, having the flexibility to allow widely for varying housing types in collaboration with density bonuses is ideal.

While density bonuses have been proven to work in some cases of cities, the limitation is that it is usually only applicable in the zones that allow for Mid and/or High-density residential developments. With only a handful of land parcels currently assigned as such, among the vast majority of Single-family residential zones this policy tool implementation demands conjunction with zoning ordinances or subdivision regulations that allow for upzoning the existing land parcels at strategic locations. While it is probable that the impact of this strategy on housing availability might be slow-paced, we can be certain that this strategy paired with other policies such as a citywide Right to Return, Missing Middle Housing Ordinances, Adaptive Reuse/Redevelopment, etc. will have a greater impact in the long run.

Referral System

Social Determinants of Health (SDOH) can be broken down into five general categories for SDOH are economic stability, education access and quality, health care access and quality, neighborhood and built environment, and social and community context (Healthy People). These social determinants all work together to create a healthy, sustainable lifestyle. Many communities that are vulnerable to displacement struggle with other SDOH categories as well. There are often barriers such as lack of community outreach, language barriers, lack of trust, and complex application processes. A closed-loop referral system works to streamline, improve, and increase the accessibility to housing programs as well as other SDOH resources for those communities most vulnerable to displacement. The system will connect the different SDOH resources together so that when a person seeks help in one category, they can easily receive help in other categories as well. The benefit of having a closed-loop referral system is that when an individual seeks help for language skills, for example, those that are providing that help can also easily offer resources for rental assistance if that is determined to be useful. Rather than referring the individual to a completely outside source, they can refer them to someone that they work with regularly. This helps eliminate people getting lost in the cracks of different programs. The difficulty with this strategy is that it takes some time to set up. All of the different organizations need to come together and be united in order to pull it off. Additionally, these resources need to feel accessible to people. It doesn't matter if the whole system is linked together if nobody chooses to use it. Having strong inner connections and high accessibility is what will make this strategy work.

Tenant Eviction Right to Counsel

In Utah there are several types of cases that qualify for right to counsel. These types of cases provide people with legal help even if they can't afford it. One way to protect renters is to give this legal representation to eviction cases as well. People who are evicted are put at risk of several other issues such as homelessness, loss of child custody, unemployment, mental and physical health problems, loss of possessions and even incarceration (Pollock, 2022). Evictions often disproportionately impact communities of color and low income communities. Additionally, these communities may have less success accessing and understanding legal processes due to language differences and other barriers.

Tenant Eviction Right to Counsel could provide legal representation for eviction cases at no cost. This representation would guide tenants through eviction processes, allowing them the possibility to stay in their homes, giving them more time to vacate, covering small eviction related fees, or maintaining a clean eviction record. The state already provides legal counsel for other cases, so adding on eviction cases wouldn't be as difficult as starting the right to counsel from scratch. One weakness that this strategy has is the monetary cost of providing legal counsel. To combat this cost it is possible to give legal counsel to individuals who meet certain qualifications rather than providing it to everyone. These qualifications should be targeted at those who are most in need of legal help in order to help protect the most vulnerable.

Right to Return

A right to return policy allows residents who were displaced to have a chance to move back to the area after new development has been completed. Priority is given to those who can show that they were forced out of the area due to gentrification. This allows for new development without displacing the entire neighborhood. One example of this policy in action is in Portland, Oregon. One woman's landlord died and the building went up for sale. She was forced to find another place to live about an hour away from her original home. Because of the right to return policy she was able to receive down payment assistance and is now happily living in her new home in her original neighborhood (Sevcenko, 2022).

This policy would be useful in Salt Lake City. It allows for new development and change to happen, but protects the people that already live here. In Portland, the right to return application is based on a point system. Points are given for things like where the person lived, where they moved to, how much family they have in the original neighborhood, and how badly the original area was affected by gentrification. The point system allows the city to give priority to those who were most affected by displacement and give the greatest amount of help to those that have been impacted the most. Perhaps the biggest barrier to implementing this strategy is cost. In the Fall of 2017, Portland received around 1,100 applications for this policy (Sevcenko, 2022). There were only funds to subsidize 65 households. In order for this strategy to be effective, there has to be financial support. With the right funds, this strategy could really help residents who are at risk for being displaced.

Real Estate Transfer Tax

The production and preservation of affordable housing often requires government subsidies or other investment. A Real Estate Transfer (RET) Tax on home sales within Salt Lake City can be implemented to produce more affordable housing. Proceeds from the RET tax would go into an affordable housing fund that could have flexibility to buy, build, or otherwise fund affordable housing projects. The government charges the tax when ownership of property transfers between individuals. The tax amount is based upon the total value of the transferred property. A city, state, or county can impose such a tax when a seller transfers a title, certificate, or deed to a buyer. Transfer taxes are not

Thriving in Salt Lake City

deductible from state or federal taxes. In the current real estate market, buyers usually pay the tax. In certain states, both parties must pay some of the transfer tax. In some real estate transactions, the transfer tax can be more than 4% of the property's sales price. Thirty-eight states have some form of real estate transfer taxes; twelve do not, including Utah. Certain states do not charge a transfer tax on top of mortgage recording taxes when a property is bought and sold. In contrast, some high-cost cities like New York City charge both. There is an excellent precedent for using an RET tax as a funding mechanism for the creation of affordable housing. Aspen, CO, has over 300 units of city-created, permanent affordable housing in one of the most expensive communities in America, primarily created through revenue from its real estate transfer tax. While Aspen's individual parcels obviously sell for a much higher value than Salt Lake City's, Salt Lake experiences a much larger sales volume, so the amount generated even from a small tax could be substantial.

However, Colorado passed the Taxpayer's Bill of Rights in 1992, which prohibited any more communities from passing such a tax in the state. At the time of the bill's passage in 1992, twelve towns (primarily ski resort communities) had RET taxes in place that were grandfathered in, including Aspen's. The bill also prohibited increases of existing transfer taxes; therefore, Aspen's current transfer tax is permanently at 1.5%. A similar situation has played out in Oregon, where only Washington County is allowed to have a RET tax. This sort of retaliatory state policy is something SLC should keep in mind if the city chooses to pursue an RET tax.

Nothing currently prohibits an RET tax in Utah. In fact, in 2019, the legislature came close to passing Utah HB 441, which would have enacted a state RET tax. The Aspen RET tax generates \$10-20 million dollars per year on average. However, due to the pandemic and skyrocketing home values around the west, the Aspen Affordable Housing Fund began 2021 with over \$53 million in the fund's budget. Despite this apparent windfall, the city still struggles to meet demand, given constraints like increasing material and labor costs.

Immediate impacts in housing production from the RET tax would be muted since there needs to be enough capital to fund a project, but over the long-term, it would be another piece of the pie toward helping develop affordable housing. Additionally, because they are locally generated funds, there is flexibility in how these funds are used. RET tax funds could be used in more nimble, effective, and targeted ways than just producing new housing. A RET tax strategy would be one way that SLC could take advantage of a hot and expensive housing market to generate housing for at-risk populations.

Missing Middle Housing Ordinances

Missing Middle Housing is "a range of house-scale buildings with multiple units that are compatible in scale and form with detached single-family homes" (Missing Middle Housing). Missing middle housing can include housing types such as duplexes, triplexes, fourplexes, townhomes, cottage courts, courtyard buildings, and other house-scale, multi-unit buildings.

Missing middle housing carries several advantages over single family detached housing that make it an attractive anti-displacement strategy. For example, the nature of middle housing allows an increased number of housing units to exist on a building footprint comparable to a single family home. The increased density without an increase in height or building footprint allows neighborhoods to grow without sacrificing the close-knit community fabric that is sometimes threatened by large multi-family developments. In addition, prioritizing house-scale developments lowers the barriers to entry faced by many would-be neighborhood developers, often property owners with a strong connection to the neighborhood but lacking the capital to accomplish the development of an entire subdivision. Lowering barriers to entry for small developers can allow a neighborhood to grow incrementally, imitating the development pattern widely seen in American cities before the postwar suburban boom in the mid-20th century, while enabling it to build generational wealth that can prevent displacement. Older neighborhoods often have a significant stock of middle housing already, but zoning codes make these often historic homes illegal to build on the same spot today, and in some extreme but unfortunately not uncommon cases, illegal even to repair or expand nonconforming properties.

The city can make modifications to its zoning code that would encourage the gradual redevelopment of the neighborhood to include more middle housing. Important changes that should be considered include modifying minimum setback, minimum lot width, and minimum parking space requirements, as these dimensional standards often preclude missing middle housing from being a viable financial strategy for developers. For example, the current Salt Lake City requirement that a developer provide 2 parking spaces for each dwelling unit when constructing a duplex or twin home increases the land costs and reduces the amount of rentable square feet, making duplexes financially unattractive compared to a single-family dwelling. The result is that developers construct many more single-family dwellings than two-family dwellings.

In addition, the city can also create a missing middle development guide with pre-approved housing plans like those developed for small developers in Chattanooga, TN. A small developer using one of these plans would be subject only to administrative review. These modifications to the city's zoning ordinance would make possible a potentially large increase in the number of housing units within Salt Lake City. A missing middle housing zone change's main drawbacks are its mid-to-long time horizon before beneficial impacts are felt, and potentially limited number of housing units generated. These stem from the proposed policy's main strength, namely: decentralizing the production and preservation of affordable housing. As such, this strategy should be used in tandem with other affordable housing and anti-

displacement strategies for maximum effectiveness.

ADU Ordinances

Accessory Dwelling Units (ADUs) are an additional residential building that occupies the same lot as a primary residence, like a guest house or basement apartment. Internal Accessory Dwelling Units (IADUs) have the potential to be an effective anti-displacement strategy in Salt Lake City. Effectively, IADUs are rooms or basements of existing homes that are converted into proper living spaces. The cost of converting a space into an IADU is usually far less than the cost of constructing an external ADU.

Stringent regulations need to be placed on IADUs, though, to prevent these units from being used as short-term rentals (e.g., AirBnB's), thereby nullifying any positive impact they would have had on housing stock and displacement. In other words, IADUs could be used as short-term housing (usually less than 30 days), which does not help to solve the housing crisis in Salt Lake City. Thoughtful consideration on how to regulate IADUs needs to be carried out in order to maximize their benefits for those seeking long-term residence. This thoughtful regulation is doubly important when considering that the Utah legislature has granted Internal Accessory Dwelling Units to be a right of the property owner, meaning they do not need to apply for approval (building codes, such as ingress and egress, still need to be met, however). This may result in Liberty Wells' property owners converting basements, or other rooms in their homes, into spaces that can be rented for passive income at far higher rates and instances since there are far fewer regulatory hoops for them to jump through.

Other efforts that Salt Lake City can make to encourage ADUs (internal or otherwise) include revising the city's zoning code to allow ADUs as of right rather than requiring conditional approval and relaxing the size requirements to allow the construction of ADUs with less square footage. Finally, the city should consider setting up a grant program to provide homeowners with up to \$120,000 to create safe interior ADUs. Other financial incentives include offering homeowners low-interest or forgivable loans to build or convert space into an ADU. Requirements may be placed on the loan to ensure that the ADUs remain affordable to limit displacement.

ADUs can be a powerful anti-displacement strategy by allowing existing homeowners to generate income from their homes while at the same time providing an affordable place to live for those who rent. The smaller square footage of ADUs lends itself to natural affordability. In addition, since ADUs decentralize the production of affordable housing and encourage its preservation on a home-by-home basis, Salt Lake City can avoid spending millions of dollars out of its budget to achieve its affordable housing goals. Finally, ADUs by design fit well into the existing neighborhood fabric, with IADUs not substantially changing the built environment at all.

Potential drawbacks of expanding options for ADUs in Salt Lake include the fact that ADUs represent a long-term solution to a problem that is being acutely felt in the short term. Without well considered regulation, ADUs can quickly become unaffordable and poorly designed if built, or never built in the first place. ADUs are difficult to make financially viable and exist in a very narrow regulatory window.