



# 2022 Moderate Income Housing Plan



2021 Parade of Homes | Built for a teacher by  
Washington County School District construction  
program students

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# INTRODUCTION

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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 attainable housing, i.e. housing for all ages and income levels, in the City of St. George, and outline the City's strategies to address the affordable housing gap.

- 1 - To meet the needs of people of various income levels living, working, or desiring to live or work in the community
- 2 - To allow people with various incomes to benefit from and fully participate in all aspects of neighborhood and community life
- 3 - Determine how the jurisdiction will provide realistic opportunity to meet the need for additional moderate-income housing within the next five years
- 4 - Receive consideration for funding of projects based on compliance with the moderate-income housing requirement

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 affordable 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 a moderate-income housing element as part of the general plan. In 2018 and 2022, House Bill 259 and HB 462 were respectively passed, reaffirming 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 Housing and Urban Development, 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 Median Family Income (HAMFI) or Area Median Income (AMI) into four categories shown below.

Extremely low-income ≤30% HAMFI (AMI)	Very low-income 30-50% HAMFI (AMI)	Low-income 50-80% HAMFI (AMI)	Non-low income ≥80% HAMFI (AMI)
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This MIH Plan will focus on the housing needs for the first three categories.

## TERMINOLOGY

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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 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 2022 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 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 30-50 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:* Households with incomes at or below 50 percent of the area median income (AMI) that do not receive government housing assistance, pay more than 50% of their income for rent, and live in severely inadequate conditions. Also defined as Worst Case Housing 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 eligibility: Extremely low-income (<30% AMI), Very low-income (30-50% AMI), and Low-income (50-80% 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 with at least one member of the household employed in the local labor pool. Workforce housing is often subsidized by municipalities to retain people in vital occupations who may have below average incomes, such as teachers, police officers, firefighters, and nurses.

# DEMOGRAPHICS

## Population and Growth

The US Census Bureau estimated a total population of 87,176 residents in the ACS 5-year estimate. Though, their 2021 snapshot shows that the population has grown from 95,284 in 2020, to 99,958 in 2021, a 4.9% increase over one year. It is also estimated from census reports that St. George had a net increase of 22,445 residents between 2010 and 2020, with an average growth rate of 3.08% residents each year. With the same growth rate, the city can expect a population of 114,887 residents in 2025.

Based on the City's current average household size (2.74 persons), these additional residents would equate to 7,133 new households over the next five years. This approximates to 850 new households per year.

It's notable that the original ACS 5-year population estimate for 2020 listed St. George City's population at 87,176 residents, and expected a population of 98,824 in 2025 based on the average 2.54% growth rate between 2015 and 2020. The 2021 number provided in the snapshot has already exceeded that projection, with 5.1% growth between July 2020 and July 2021.

Building permit data demonstrates that the City issued a total of 1,527 residential permits in 2021. If the population growth rate continues at the census average growth rate as mentioned above, and the building rate continues at its current pace and type, there will not be sufficient housing, especially for moderate income earners.

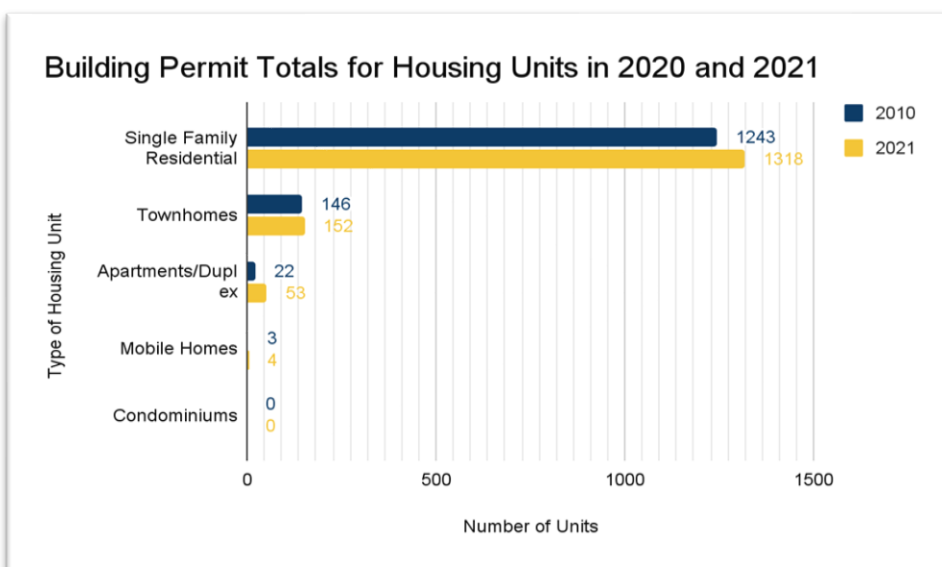


Figure 1, Building permit totals for housing units in 2020 and 2021. City of St. George, 2022.

## Ethnic And Racial Minority Populations

According to the US Census Bureau, 11.5% of the population of the City of St. George identified themselves as a mix of two or more races, or, not solely white. 12.8% of the population identified as Hispanic or Latino. Figure 2 illustrates the racial makeup of the City of St. George, and Figure 3 shows the same, but does not include those who are solely white to more clearly demonstrate the percentages.

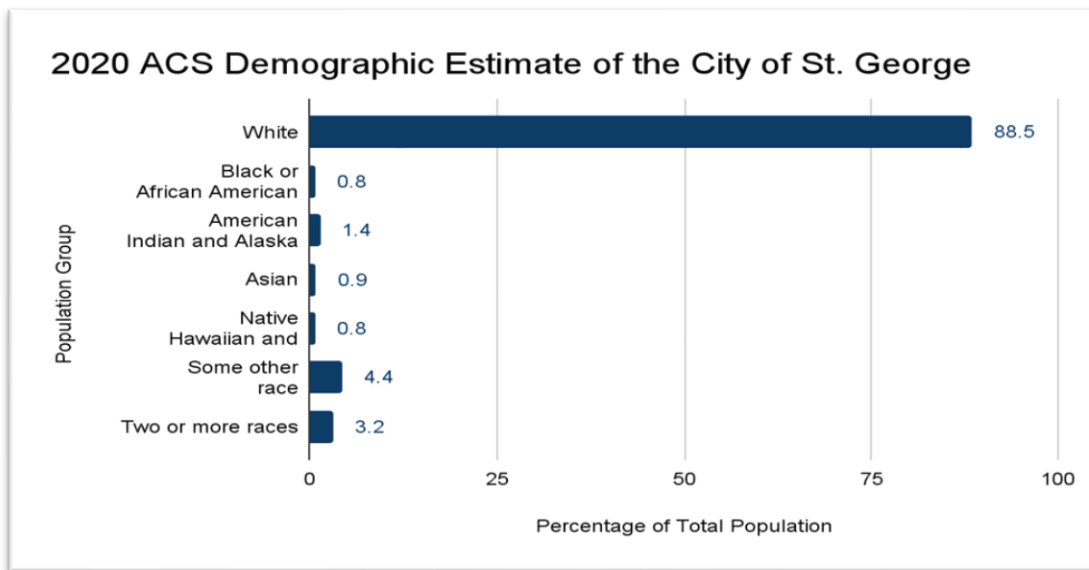


Figure 2, Demographic estimate of the City of St. George. US Census ACS 5-year Estimate, 2020.

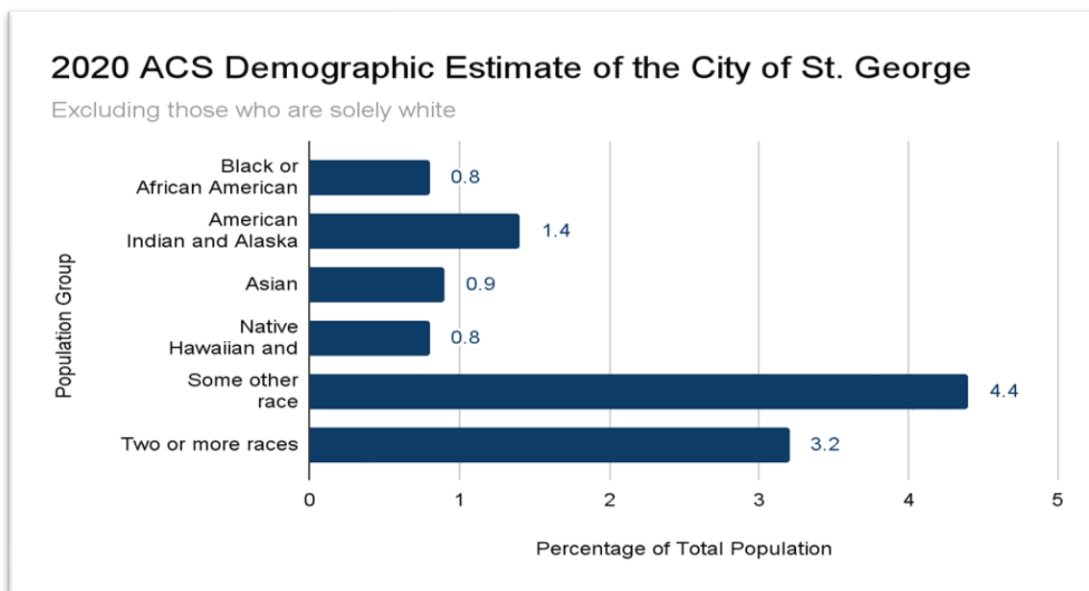


Figure 3, Demographic estimate of the city of St. George, excluding the population whose race is solely white. US Census ACS 5-year Estimate, 2020.

## Ethnic and Racial Groups at Risk for Poverty

In 2020, the percentage of people living under the poverty threshold is 12.8%. Utah has a percentage of 9.1%, while St. George has a slightly higher percentage at 11%. Figure 4 charts the distribution of different racial or ethnic groups that fall under the poverty threshold in the City of St. George

Ethnic and Racial Makeup of People Under the Poverty Threshold in the City of St. George

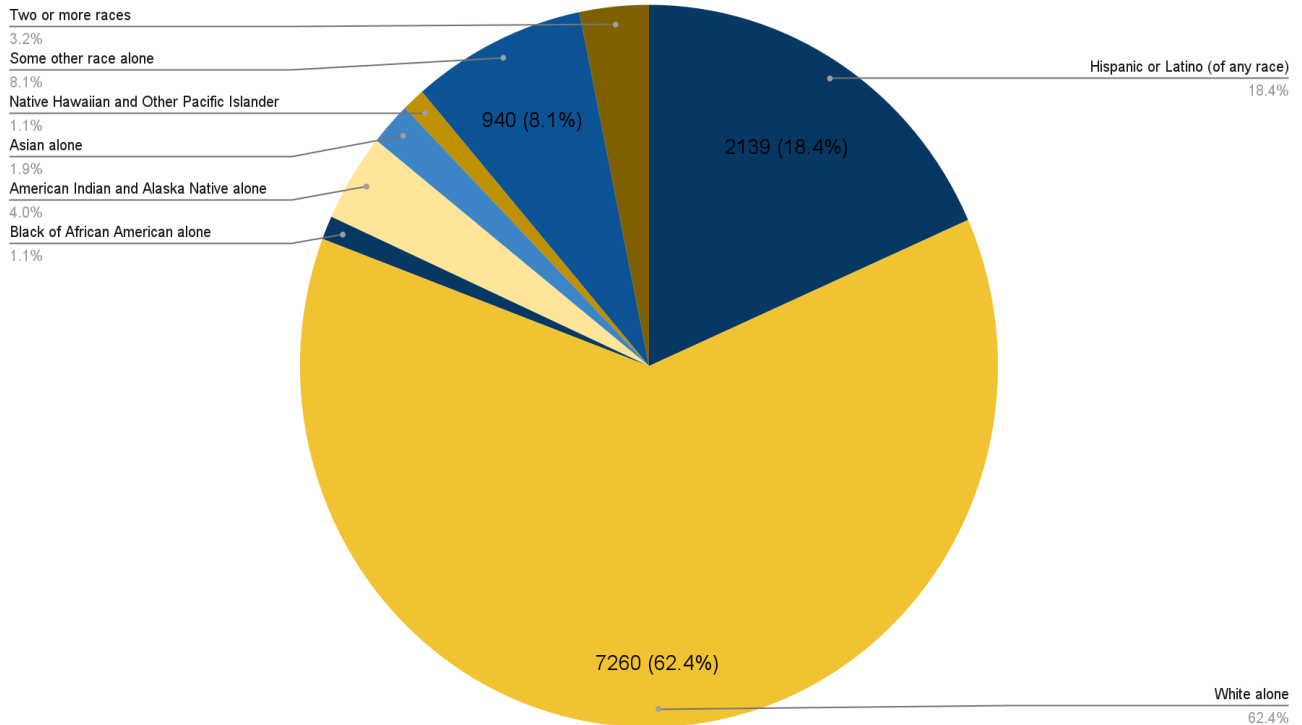
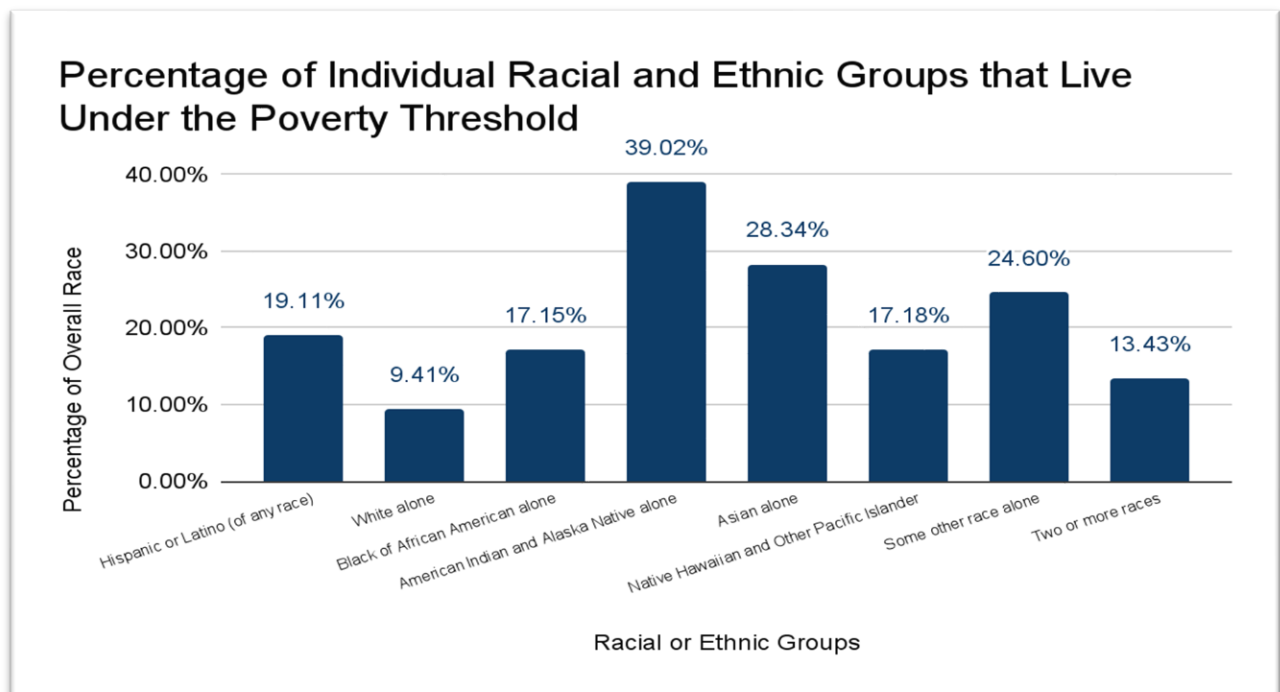


Figure 4, The ethnic and racial makeup of people under the poverty threshold in the City of St. George. US Census ACS 5-year Estimate, 2020.

National research has indicated that the proportion of racial and ethnic minorities may be moderately correlated with an area's poverty level. While white populations have the largest percentage under the poverty threshold in St. George, racial and ethnic minorities (non-white) are more likely to be under the poverty threshold in relation to the size of their racial or ethnic population in the City of St. George. In the US, the ethnic group with the largest poverty to person ratio are American Indian and Alaskan Native identifying persons (24.1%). This phenomenon is also reflected in St. George, where 39.02% of the American Indian and Alaskan Native population in St. George lives under the poverty threshold. Figure 5 demonstrates the percentage of people living in poverty



threshold in relation to each racial or ethnic group.



*Figure 5, Percentage of individual racial and ethnic groups that live under the poverty threshold. US Census ACS 5-year Estimate, 2020.*

## 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, disabled persons, the homeless, or those otherwise in need of specialized or supportive housing.

## Seniors

The City of St. George has a significant senior population. In 2020, the ACS estimated that there are 20,742 residents who are 65 years of age or older, 23.8% of the overall population of St. George. Approximately 7.1% of which are living 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 offers affordable housing options for seniors within the City. There are public housing and Section 8 housing

options that cater specifically to seniors. Dixie Sun Manor is a public housing complex specifically catered to seniors. Switchpoint is also actively working to build additional senior housing projects.

## **Disabled Persons**

In 2020, it is estimated that there are 11,533 people with disabilities in the City of St. George, or 13.3% of the total population. Disabled people often face financial and social difficulties that make obtaining housing a challenge. Currently 12.6% of the disabled population live below the poverty level. Programs that are geared towards 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 Annual Report on Homelessness released in 2022, there are an estimated 994 homeless people in Washington County, a 23 person decrease compared to 2020. The average and median days spent homeless in Washington County have increased by 5.64 days between 2020 and 2021. The number of people who returned to homelessness after exiting homelessness to permanent housing have also increased by 4.38% in 2021, compared to the previous two (2019-2020) years as well. As reported by the 2022 point-in-time count, among the homeless population, adults with mental illnesses, adults with substance abuse disorders, and survivors of domestic abuse (adults and minors) were the most common, indicating that these populations are particularly vulnerable in the community.

St. George has several organizations dedicated to assisting the homeless population. Switchpoint Community Resource Center is the most prominent. Switchpoint aims to empower homeless families and individuals by addressing the underlying cause of poverty and support them on their journey to stable affordable housing. In October of 2020, Switchpoint opened Riverwalk Village, an affordable housing project. It provides a mix of 55 one-, two-, three-, and four-bedroom units for residents within low- and moderate-income brackets and the chronically homeless, with onsite case management to ensure residents have the support and access to resources needed to be successful renters.

Switchpoint's newest project is The Point, an affordable housing project that converted a studio motel in St. George to housing. The Point was made possible by private donations, Switchpoint resources, and federal funding that passes through the City and

State (\$598,287 of CDBG Cares Act funding and \$2,000,000 of funding from the Governor's Office of Planning and Budget). The Point provides 52 units of housing for those making 55% or less AML. It opened in February 2022, was fully occupied within a month, and has a waiting list of over 100 people. Both of these projects demonstrate the immediate need for housing that is affordable and accessible for low-income individuals and families.

## **Veterans**

The City of St. George is home to 5,029 veterans in 2020, making up an estimated 7.7% of the population aged 18 years and older. Among the veterans, 98.5% are male, and 1.5% are female. Of the veteran population, 80.9% are aged 65 years and older. 39.2% of veterans report having some form of disability, meaning among the whole disabled population aged 18 and older in St. George, 18.2% are veterans.

Working-age veterans, aged 18 to 64 years, have a higher unemployment rate than non-veterans. Veterans have a 6.1% unemployment rate, while nonveterans have a 3.8% unemployment rate. 328 veterans were reported to be living below the poverty level, which is lower than the City's rate by 3.5%. According to the 2020 ACS 5-year estimate, the median annual income of a veteran is \$41,371, which is 51% higher compared to a nonveteran at \$27,366, suggesting that a single income household with a veteran as the income earner is more likely to be able to afford a median housing unit in the City of St. George 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 23.8% of the total population within the City of St. George. The City regularly contributes to projects that address poverty and homelessness through the Switchpoint Community Resource Center, Riverwalk Village, and the Point, and will continue to seek ways to increase affordable housing options for low and moderate income households.

# **HOUSING AFFORDABILITY**

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## **Analysis of Income**

Housing affordability is a direct function to income. To understand the affordability of housing, we begin by analyzing the City of St. George residents' income. This is critical to understanding the City's affordable housing needs. This process is done using the

US Department of Housing and Urban Development's (HUD) Area Median Income (AMI) measure. The AMI helps determine the amount that a household at each income level can afford. ***The 2022 AMI for St. George Metropolitan Statistical Area (MSA) has an annual salary of \$83,900.*** HUD has determined specific income brackets for the AMI, as follows:

Extremely low-income ≤30% HAMFI	Very low-income 30-50% HAMFI	Low-income 50-80% HAMFI	Non-low income ≥80% HAMFI
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Figure 6 illustrates the percentage of the St. George MSA 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.

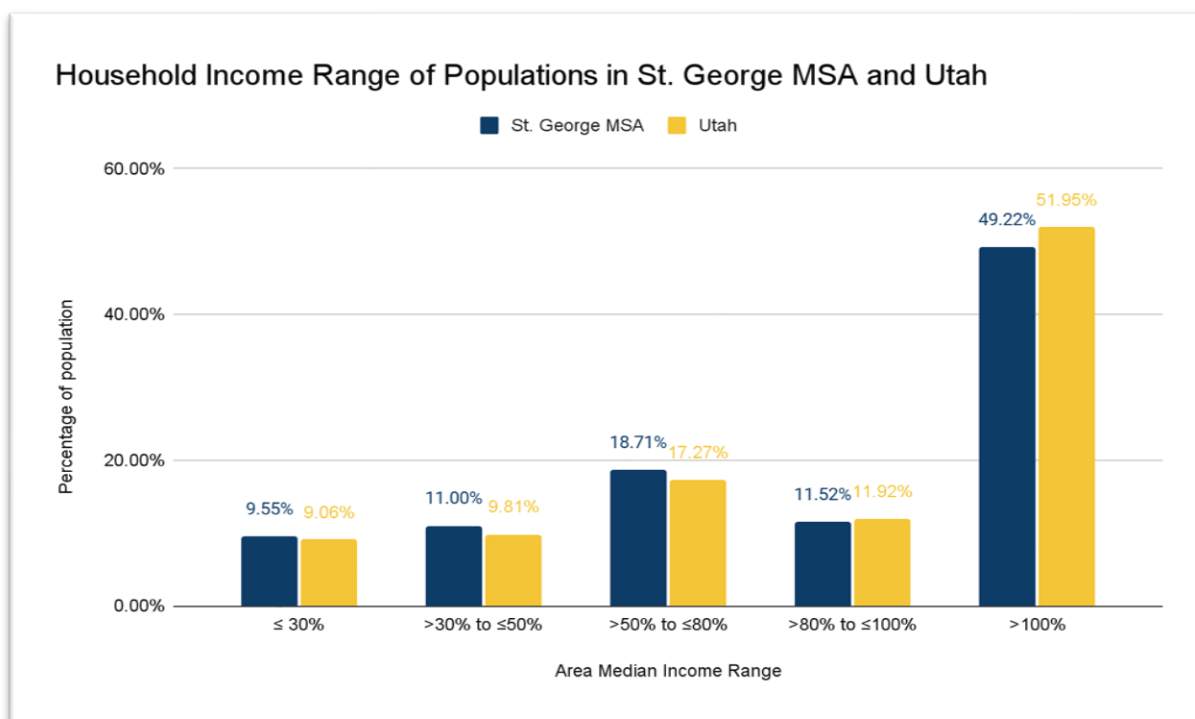


Figure 6, Household income range of populations in St. George MSA and Utah. HUD, 2022.

## Determination of Moderate Income

Moderate income is considered 80% of the AMI. In St. George, the moderate income for 2022 was an annual salary of \$67,120 or less. According to 2014-2018 CHAS data, 39.3% of all households in the City of St. George fall within the moderate-income bracket, 3.2% higher than the State of Utah.

## 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 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 move to St. George, allowing them to benefit from and fully participate in neighborhood and community life.

In 2022, the AMI for a family of four in St. George was \$83,900 annually, or \$6,992 monthly. Based on this standard, mortgage or rent and utilities should not exceed \$2,098 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 ( $\leq 30\%$  HAMFI) in the City of St. George earns \$25,170 annually, or \$2,098 monthly. Mortgage, or rent and utilities should not exceed \$629 monthly. Table 1 below summarizes the maximum monthly affordable housing costs for various income levels in the City of St. George.

Washington County Housing Attainability Snapshot					
<b>\$83,900</b> HUD 2022 Median Family Income Bracket - Family of Four	Household Annual Income Amount	Maximum Monthly Rent or Mortgage Expense	Estimated Monthly Utility Costs	Maximum Monthly Housing Expenses (30%)	Maximum Mortgage Loan Amount (5.1% interest, 30 yr. loan, \$1200 prop tax, \$600 insurance, no HOA)
$\leq 30\%$ AMI - Extremely Low-Income	\$ 0 - \$27,750	\$ 0 - \$ 493	\$ 200	\$ 0 - \$ 693	\$ 115,000
$>30\%$ to $\leq 50\%$ AMI - Very Low-Income	\$27,750 - \$41,450	\$ 493 - \$ 836	\$ 200	\$ 695 - \$ 1,036	\$ 187,000
$>50\%$ to $\leq 80\%$ AMI - Low-Income	\$41,450 - \$66,300	\$ 837 - \$ 1457	\$ 200	\$ 1036 - \$ 1657	\$ 305,000
$>80\%$ to $\leq 100\%$ AMI - Moderate-Income	\$66,300 - \$83,900	\$ 1457 - \$ 1897	\$ 200	\$ 1657 - \$ 2097	\$ 390,000
$> 100\%$ AMI	\$83,901+	\$ 1897 - \$ 2317	\$ 200	\$ 2097 - \$ 2517	\$475,000

Source: 2022 HUD Income Limits (<https://www.huduser.gov/portal/datasets/il/il2021/2022summary.odn>); NeighborWorks

*Table 1, Monthly affordable housing costs for various income levels in the City of St. George.*



## Available Housing and Prices

Knowing the income levels and cost of available housing in the City of St. George will help to determine if housing needs of all residents are being met. Property research conducted on the Zillow.com page indicates that there were 448 active properties for sale in the City of St. George on June 7 of 2022. According to Zillow, the median asking price is \$544,079 for the middle price tier of homes. The high-price tier of homes was excluded as they may skew the asking price to an unrealistic number for the average home purchaser.

## Value of Existing Housing Stock

The current market value of the housing stock is used to determine affordability of home ownership.

### Value of Existing House Stock

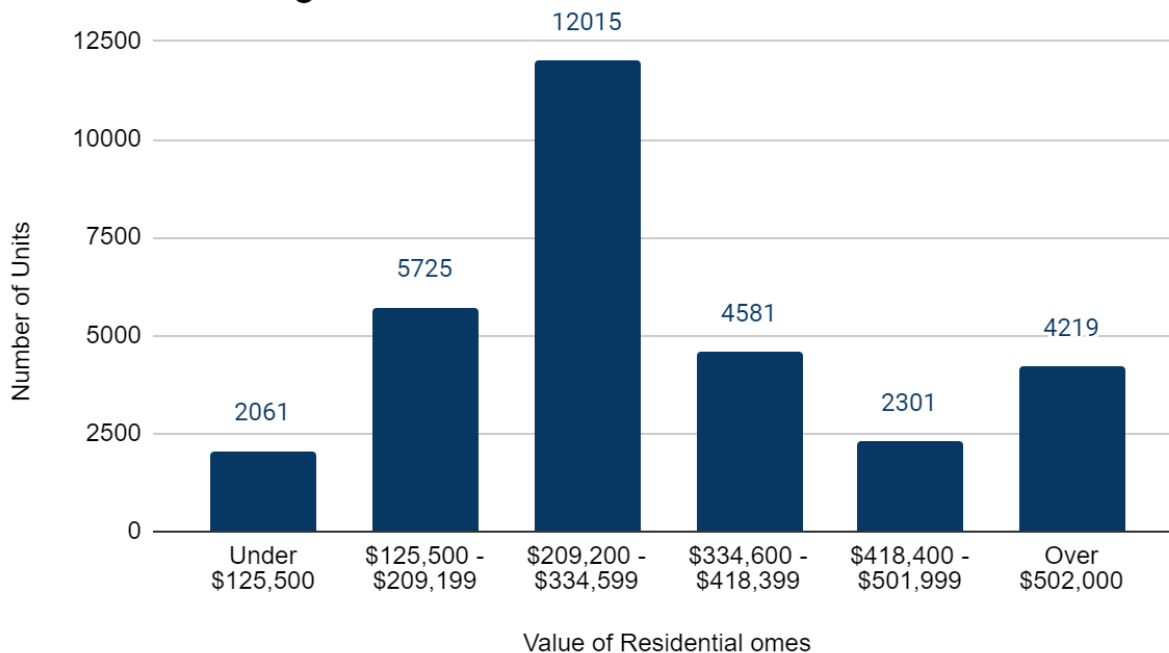


Figure 7, Value of Homes in St. George as of June 7, 2022.

## Affordability of Home Ownership

Approximately 39.3% of all households in the City of St. George earns a moderate income or below. According to Utah Real Estate, the median sale price of single-family

homes rose by 33.7% between 2020 and 2021. As of the second quarter of 2021, the median sale price of a single-family home was at \$554,700. Of those units listed for sale on Zillow on June 14 of 2022, only 55 out of 465 units for sale are affordable to moderate income households.

From information retrieved from Zillow, we can also see that there is a significant lack of affordable housing available for purchase. Even though 39.3% of households in St. George fall under moderate income definitions, only 55 units are considered affordable for purchase.

Additionally, the 2Q2022 report from national housing and real estate analytics company, Zonda, indicates the median base price for a new detached home in the St. George housing market (Washington County, Utah) is up 32% compared to 2Q2021 to \$608,800, with a decrease in new construction in all price ranges below \$600,000. The median price for a new attached home is \$422,200, a 20% increase over 2Q2021. Comparatively, the median price for a new home in Mesquite is \$410,200. This translates to a widening gap in attainable housing for moderate-income families in St. George.

According to an article, “*Blog: The Good, The Bad, and The Ugly: Addressing Utah’s Short Term Rental Market Growth*” published on the Kem C. Gardner Policy Institute by the University of Utah, Utah has seen a 38.4% increase in short term rentals on the market within between 2018 to 2021. Being at the gateway of multiple state and national parks, and as a popular winter getaway, St. George has a significant number of short term or vacation rentals. While there is much debate about the benefits versus drawbacks of vacation rentals like AirBnB and VRBO, it’s acknowledged that a large majority of these rentals are single family homes, apartments, and townhomes—meaning that those units are removed from the market for residents. Leaving a gap in the market where all income levels have to struggle for available units.

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 the quality of life and reduces the ability to participate in the local community.

## **Affordability of Rent**

According to the ACS 2020 5-year estimate, there are 10,932 occupied units paying rent in the City of St. George. The average rent in 2020 was \$1,088, or \$966 for a two-

bedroom unit. According to Zillow (extracted on May 17, 2022), the median cost of rent for available units is \$2,312, significantly higher than 2020. In 2022, residents within the moderate housing bracket ( $\leq 80\%$  AMI), should not exceed \$1,678 in housing costs. While the median rent in St. George appears to be affordable for moderate-income households; new moderate-income residents to the area may find it difficult to find affordable rental units in the current market. Local community has also reported that landlords are currently raising rent by \$200 to \$500 per month, which would increase the existing average rent anywhere from 20 to 50%.

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. The US census estimates that in 2020, more than 47.48% of renter households pay more than 30% of their gross income towards rent costs, and 19.04% of households pay more than half their gross monthly income towards rent. 2018 CHAS estimates indicate that 47.8% of rental households in Washington County are cost burdened. The figures below illustrate the number of cost burdened renter households in Washington County.

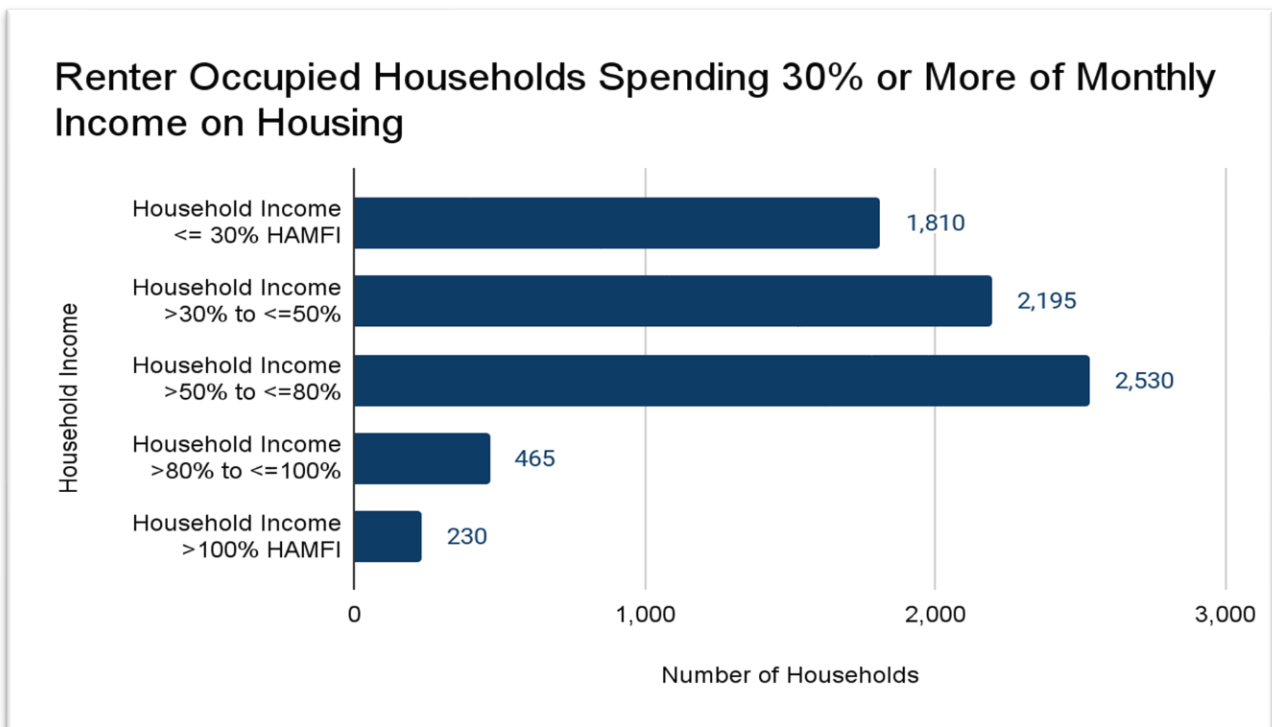


Figure 8, Renter occupied households spending 30% or more of monthly income on housing costs for Washington County. CHASS data, 2014-2018 data.

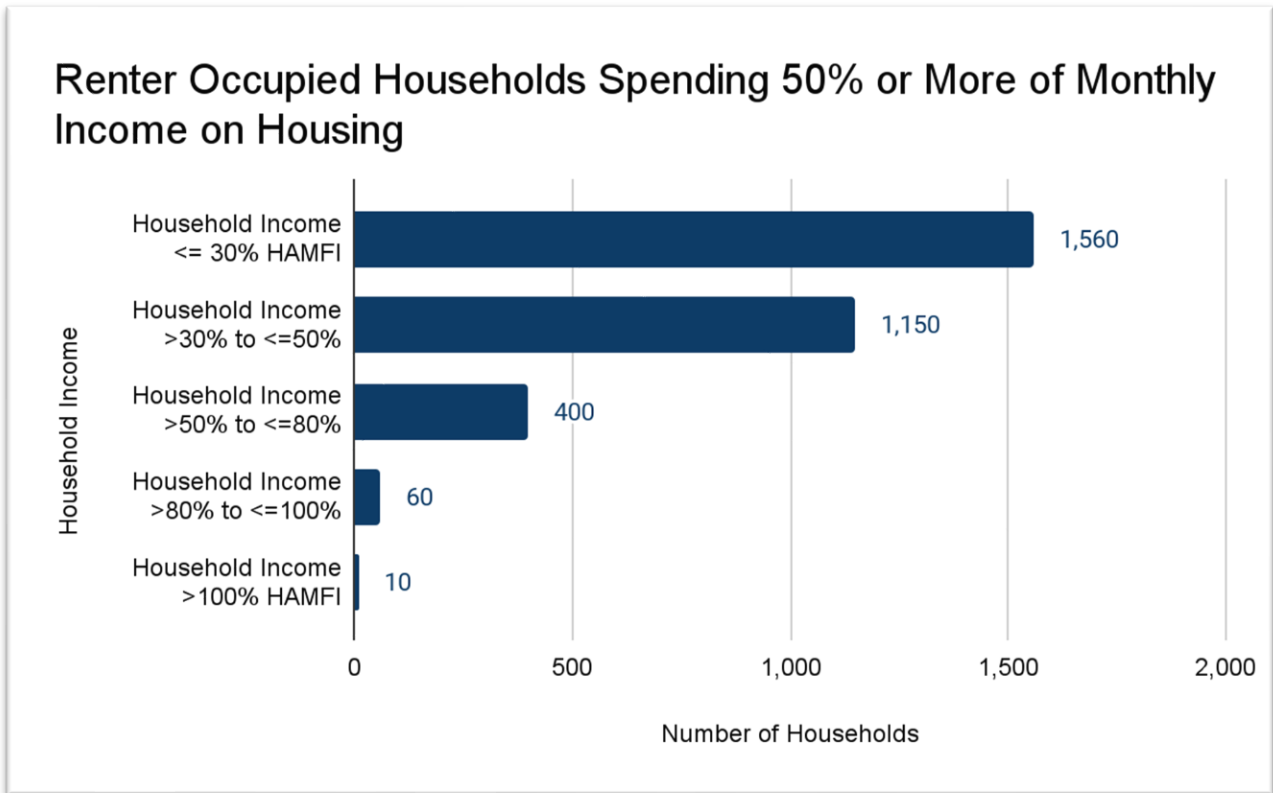


Figure 9, Renter occupied households spending 50% or more of monthly income on housing costs for Washington County. CHASS data, 2014-2018 data.

As noted above, the group most heavily burdened by housing costs are extremely and very low-income household groups. The lack of affordable rentals is similarly reflected in owner occupied housing.

**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 number of households that fall within the specific income bracket for those units.

In looking at figure 9 below titled *Washington County’s Affordable and Available Rental Housing Deficit*, we see the gap widen as the HAMFI decreases. For example, for the households within the very low-income brackets, there are only 4,015 affordable units within the City, and a deficit of 115 available units, and even fewer 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 1,005 affordable units within the city, and a deficit of 2,110 available units.

It's worth noting that although the graph was published in 2020, the information presented is collected between 2013 and 2017. Taking the rapid growth of St. George into account, the existing information does not adequately reflect the current situation in the city. Especially with recent market rent increases, and wealth gaps exacerbated by COVID, the affordability and availability rental housing gap are expected to be much larger.

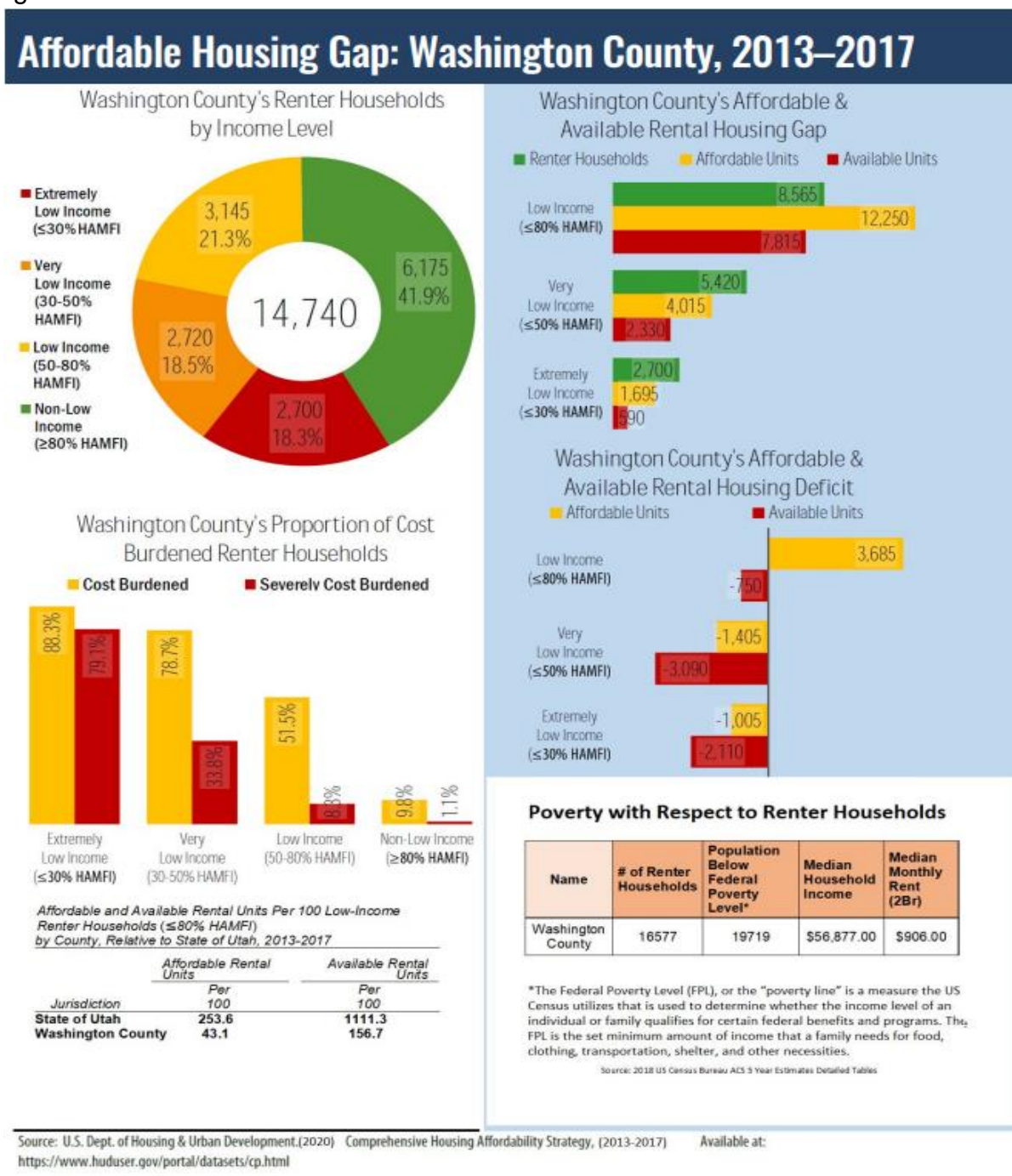


Figure 10, Affordable Housing Gap: Washington County (2013-2017).  
U.S. Dept. of Housing & Urban Development, 2020.



# HOUSING SUPPLY

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 2020 ACS estimates that of the City of St. George's 37,720 housing units, 28,781 are single-family homes, 7,788 are multi-family housing (2+ units), and 1,171 are mobile homes, boats, RVs, or other types of housing.

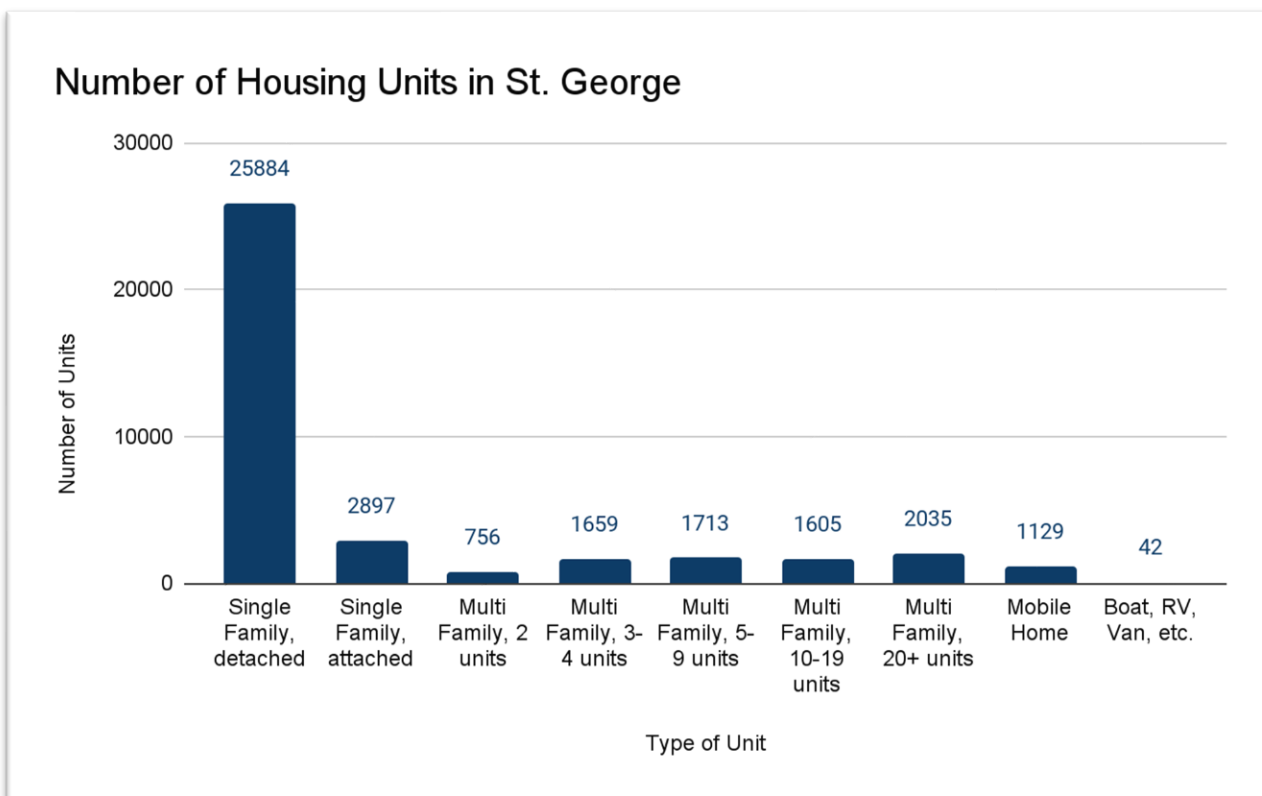


Figure 11, ACS 5-year estimate of all housing units in the City of St. George. US Census, 2020.

The City of St. George also has its own housing data which gets frequently updated. It provides a more recent and updated count of all the housing units in St. George. As of 2022, the City estimates that there are a total of 39,575 housing units. With 30,643 serving as primary housing, and 8,932 as secondary housing. 30,074 are single family homes, 8,501 are multi-family housing (2+ units), and 1,000 are mobile homes.

## Housing Occupancy and Vacancy

Housing occupancy plays a role in affordability. Out of the 37,720 units in St. George, 31,447 were occupied, and 6,273 were vacant. Of the occupied housing units, 20,515 were owner occupied, and 10,932 were rented. It should be noted that there are

discrepancies between the number of rentals reported on the Census report, and the number of legally rented units documented in the city. We currently do not have a clear and credible way to find out if certain units are legal or not, nor a completely accurate count of the total number of rentals.

## Age of Housing Stock

Approximately 88.3% of the housing stock in the City of St. George was built in 1980 or later, with approximately 11.7% of the housing stock built in 1978 or before. 44.5% of the housing stock is 22 years old and under, meaning that it's relatively new, and typically requires fewer repairs. However, approximately 29.8% of the housing stock was built before 1990 and may need ongoing maintenance to adequately supply enough affordable housing.

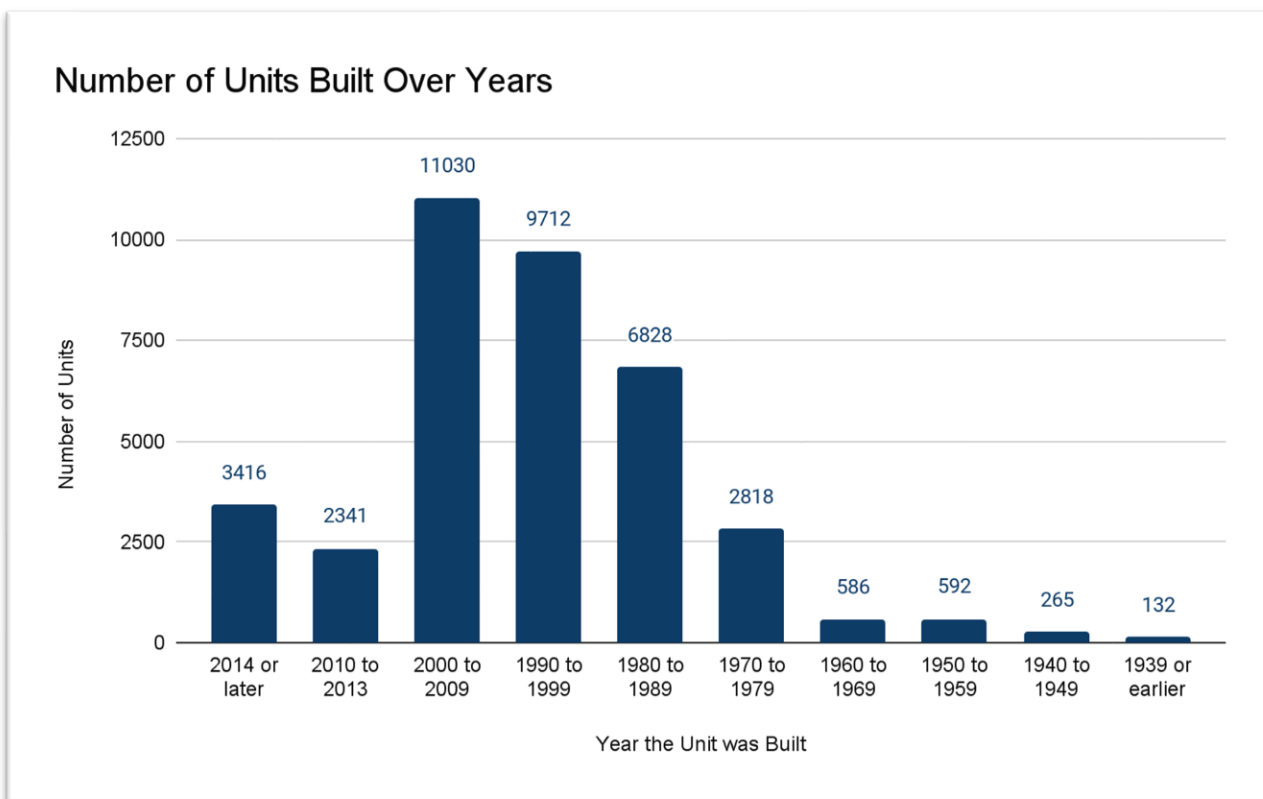


Figure 12, ACS 5-year estimate of the number of units built over time periods in the City of St. George. US Census, 2020.

## Condition of Housing Stock

Most of the housing stock in the City of 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. Between 2018 to 2022, there have been no demolished residential structures ordered by the city due to their dilapidated condition.

## ZONING REGULATORY ENVIRONMENT

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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 consists 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.

*Agricultural Zones* (A-0.5, A-1, A-5, A-10, and A-20): Single-Family Residential dwellings are a permitted use. Density of developments is according to specific zone. A-0.5 allows a minimum density of 20,000 square feet per lot. 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.

*Residential Estate Zone* (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.

*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.

*Multiple-family Residential Zones (R-2, R-3, R-4):* These zones allow for multiple-family dwellings and single-family dwellings on each lot.

*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.

*Residential Central City Zone (RCC):* This zone allows for single-family dwellings. In addition, specific lot-size requirements and architectural design guidelines exist for this zone.

*Residential Planned Development Zone (PD-R):* This zone allows for multiple-family and single-family development. The density of these developments follows the established densities of the General Plan. These densities are as follows:

1. Very Low Density Residential: 0-2 units per acre
2. Low Density Residential: 0-4 units per acre
3. Medium Density Residential: 5-9 units per acre
4. Medium High Density Residential: 10-15 units per acre
5. High Density Residential: 16-22 units per acre

*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.

*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.

*Traditional Neighborhood District Zone (TND):* This is a mixed-use development zone. This zone allows for multiple-family housing and single-family housing.

*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**

Many 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 multi-family zones, the City has approved 6,426 entitlements for new family units in the last three years (2019-2021), with 2021 seeing the largest increase of multifamily entitlements, totaling 2,826 units.

The City of St. George allows for accessory dwelling units in all residential specific zones. However, due to the large upfront cost of building ADUs, it has remained inaccessible for much of the population.

## FAIR HOUSING

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### **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 the general 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 based on 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 of 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, religions, 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 3 total fair housing related cases filed in the City of St. George between January 01, 2021, to December 31, 2021. The complaints were based on familial status, disabilities (mental), sex, and retaliation. Of those complaints, familial status was mentioned twice. Suggesting that familial status discrimination may be an ongoing issue and could be an impediment to fair housing choices.

Currently, the only formal mechanism for identifying discrimination cases, based on the parameters of the Fair Housing Act, is the incident of fair housing complaints retrieved from the Utah Labor Commission. 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 past few years. As the City continues to grow, moderate income housing will also need to increase. Between 2010 to 2020, the City of St. George grew an average of 3.08% each year. If the growth rate continues at 3.08% over the next five years, the population in 2027 will be 110,957. This increase in population will equate to 5,699 new households (using the current average household size of 2.74). Currently, 39.3% of households in the City of St. George fall within the moderate-income bracket. If the ratio remains true, 2,240 new moderate-income units will be needed to be available to accommodate these new households.

# STRATEGIES

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The following goals and strategies are designed to guide the city in helping to provide a variety of housing options, including moderate income housing, to meet the needs of people of various income levels who live, work, or desire to live or work in St. George, allowing them to benefit from and fully participate in neighborhood and community life.

The following strategies, from the moderate-income housing strategies list in Utah H.B. 462 (2022), are identified to assist St. George City in meeting its attainable housing goals.

The following seven (7) strategies from the moderate-income housing strategies list in Utah H.B. 462 are identified to assist St. George City in meeting its moderate-income housing goals.

## STRATEGY A

**Rezone for densities necessary to facilitate the production of moderate-income housing.**

### Implementation Steps

- Adopt the updated General Plan
- Amend the City Code to reflect the Downtown Area Plan and General Plan recommendations as they pertain to moderate-income housing

### Timeline:

- Adopt General Plan January 2025 – April 2025
- Amend Title 10 to reflect Downtown Plan and General Plan Jan 2025 – December 2027
- Research, create and update commercial code for Lively and Connected Corridor May 2025 – November 2025
- Research, create and update mixed use code for Lively and Connected Corridor May 2025 – November 2025
- Research, create and update code to match Connected Neighborhood in Downtown Plan October 2025 – April 2026
- Research, create, public outreach and update code to match Traditional Neighborhood in Downtown Plan November 2025 – December 2026
- Research and create Form Based Code for Plus Areas of General Plan – June 2025
- Adopt Form Based Code for Plus Areas of General Plan – January 2026-2027

- Stakeholder Meetings Dates June 2025, August 2025, January 2026, TBD
- Work Meetings Dates March 2025, August 2025, January 2026, TBD

Measure of Success: Downtown Plan and General Plan update recommendations implemented in the City Code.

## STRATEGY E

**Create or allow for, and reduce regulations related to, internal or detached accessory dwellings units in residential zones.**

### Implementation Steps

- Research and potentially amend City Code to allow for an interior and a detached ADU on the same property or allow more than one exterior ADU based on property size and location.
- Research and potentially amend City Code to remove requirement that a detached ADU matches the existing home's exterior
- Review the maximum size requirement for detached ADUs and potentially amend City Code
- Possibly Remove the owner-occupied stipulation

### Timeline:

- Research January 2025-April 2025
- Work meeting with City Council and Planning Commission March 2025
- Process code amendments June 2025

Measure of Success: Amendments to the City Code

## STRATEGY F

**Zone or rezone for higher density or moderate-income residential development in commercial or mixed-use zones near major transit investment corridors, commercial centers, or employment centers.**

### Implementation Steps

- Adopt the updated General Plan
- Amend the City Code to reflect the Downtown Area Plan and General Plan recommendations as they pertain to moderate-income housing

### Timeline:

- Adopt General Plan January 2025 – April 2025
- Amend Title 10 to reflect Downtown Plan and General Plan Jan 2025 – December 2027

- Research, create and update commercial code for Lively and Connected Corridor May 2025 – November 2025
- Research, create and update mixed use code for Lively and Connected Corridor May 2025 – November 2025
- Research, create and update code to match Connected Neighborhood in Downtown Plan October 2025 – April 2026
- Research, create, public outreach and update code to match Traditional Neighborhood in Downtown Plan November 2025 – December 2026
- Research and create Form Based Code for Plus Areas of General Plan – June 2025
- Adopt Form Based Code for Plus Areas of General Plan – January 2026-2027
- Stakeholder Meetings Dates June 2025, August 2025, January 2026, TBD

Work Meetings Dates March 2025, August 2025, January 2026, TBD

Measure of Success: Downtown Plan and General Plan update recommendations implemented in Code.

## STRATEGY H

**Amend land use regulations to eliminate or reduce parking requirements for residential development where a resident is less likely to rely on the resident's own vehicle, such as residential development near major transit investment corridors or senior living facilities**

### Implementation Steps

- Research Parking to update Title 10 Chapter 19
- Work Meeting with City Council and Planning Commission
- Amend City Code Title 10 Chapter 19

### Timeline:

- Research March 2025 to May 2025
- Work Meeting June 2025
- Amend Code July 2025

Measure of Success: Amendment of Title 10 Chapter 19, zone changes and planned development amendments that occur with a reduction in parking because of parking reductions.

## STRATEGY J

**Implement zoning incentives for moderate income units in new developments**

### Implementation Steps

- Enter into Development Agreements with master planned projects for deed restricted units throughout development to distribute moderate income units throughout the city.
- Research and create Form Based Code for Plus Areas of General Plan – June 2025
- Adopt Form Based Code for Plus Areas of General Plan – January 2026-2027

Timeline:

- January 2025 through December 2027
- Work Meetings TBD

Measure of Success: Moderate Income Housing distributed throughout the City

## STRATEGY O

**Apply for or partner with an entity that applies for state or federal funds or tax incentives to promote the construction of moderate-income housing, an entity that applies for programs offered by the Utah Housing Corporation within that agency's funding capacity, an entity that applies for affordable housing programs administered by the Department of Workforce Services, an entity that applies for affordable housing programs administered by an association of governments established by an interlocal agreement under Title 11, Chapter 13, Interlocal Cooperation Act, an entity that applies for services provided by a public housing authority to preserve and create moderate income housing, or any other entity that applies for programs or services that promote the construction or preservation of moderate-income housing.**

Implementation Steps

- Continue working with non-profits, the St. George Housing Authority, and other entities to apply for federal and state funding and incentive programs.

Timeline:

SwitchPoint project The Point at Red Hills 60 deeply affordable units to serve veterans and seniors construction begins Spring/Summer 2025 completion date August 2026

Measure of Success: 60 additional affordable units.

## STRATEGY X

**Create or allow for, and reduce regulations related to multifamily residential dwellings compatible in scale and form with detached single-family residential dwellings located in walkable communities within residential or mixed-use zones**

Implementation Steps



- Adopt the updated General Plan
  - Amend the City Code to reflect the Downtown Area Plan and General Plan recommendations as they pertain to moderate-income housing

Timeline:

- Adopt General Plan January 2025 – April 2025
- Amend Title 10 to reflect Downtown Plan and General Plan Jan 2025 – December 2027
- Research, create and update commercial code for Lively and Connected Corridor May 2025 – November 2025
- Research, create and update mixed use code for Lively and Connected Corridor May 2025 – November 2025
- Research, create and update code to match Connected Neighborhood in Downtown Plan October 2025 – April 2026
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- Adopt Form Based Code for Plus Areas of General Plan – January 2026-2027
- Stakeholder Meetings Dates June 2025, August 2025, January 2026, TBD
- Work Meetings Dates March 2025, August 2025, January 2026, TBD

Measure of Success: Downtown Plan and General Plan update recommendations implemented in Code. An increase in Moderate Income Housing units in the City.