

# CDBG Code Enforcement Plan

City of Orem



November 2022

## Overview

The City of Orem's Neighborhood Improvement Team (NIT) promotes safe and welcoming neighborhoods by increasing awareness of neighborhood codes and notifying residents whose properties are not in compliance. For 20 years, code enforcement efforts in the City were conducted by sworn officers in the City's Police Department. In July 2021, code enforcement was moved into the Community Services Division in the City Manager's Department. The code enforcement team, now known as the Neighborhood Improvement Team (NIT), includes the Community Services Manager, three civilian code enforcement officers, and a community police officer. The NIT works closely with Community Services, Police, Mental Health, Planning and Zoning, other divisions, and the Administrative Law Judge to address concerns quickly and respectfully.

The NIT strives to provide compassionate enforcement, connecting residents who are in legitimate need of assistance with property clean-up, repairs, and other assistance with the resources they need to come into compliance. The NIT seeks to achieve voluntary compliance with neighborhood code violations. However, as not all violations have the same degree of severity, the NIT has established priority ranking and procedures. This helps the NIT match the appropriate level and type of enforcement with different types and circumstances of violations to maximize available resources.

The City of Orem uses federal Community Development Block Grant (CDBG) funds from the Department of Housing and Urban Development (HUD) to fund enhanced code enforcement efforts in deteriorating low- and moderate-income (LMI) neighborhoods. With CDBG funding, the NIT is able to provide enhanced support in these areas by proactively responding to existing violations and connecting residents to the resources they need to prevent future violations.

The City of Orem created this CDBG Code Enforcement Plan in order to outline a plan for the NIT's CDBG-funded code enforcement efforts and neighborhood improvement efforts. This plan was developed in consultation with City staff and community partners.

## CDBG-Funded Code Enforcement

Orem's NIT enforces city code and nuisance ordinance violations, concentrating on illegal accessory apartments, cluttered and junky yards, and other neighborhood nuisances.

In most areas, the NIT responds to potential violations on a complaint basis. However, the City of Orem uses federal CDBG funding to fund enhanced code enforcement efforts in specific areas. According to HUD, CDBG grantees are able to use CDBG funding for code enforcement when the areas in which the enforcement occurs meet one of the three national objectives: 1) low and moderate income (LMI) area benefit, 2) prevention or elimination of slum/blight, or 3) activities designed to meet community needs by having a particular urgency.<sup>1</sup> Based on data provided by CPD's FY2021 LMISD,<sup>2</sup> 5 census tracts in Orem qualify for HUD's first national objective of low and moderate income (LMI) benefit. In these areas, a minimum of 51 percent of the residents are LMI (with income levels equal to or less than 80 percent of the area's median family income). Orem funds its code enforcement efforts in these 5 census tracts using CDBG funds. This enables the City's NIT to concentrate its most proactive code enforcement efforts in the areas that need it most.

---

<sup>1</sup> Eligible Rehabilitation and Preservation Activities, 24 C.F.R. 570.202(c).

<sup>2</sup> "CPD Maps." U.S. Department of Housing and Urban Development, <https://egis.hud.gov/cpdmaps/>.

The City has an administrative law judge to help the NIT enforce ordinance violations. The administrative law judge provides financial and/or legal consequences for code violations, which encourages residents to fix the problems. While the administrative law judge is responsible for cases in *all* areas of the City, the judge has provided an additional benefit to these 5 census tracts as a disproportionately high number of ordinance violations occur in these areas.

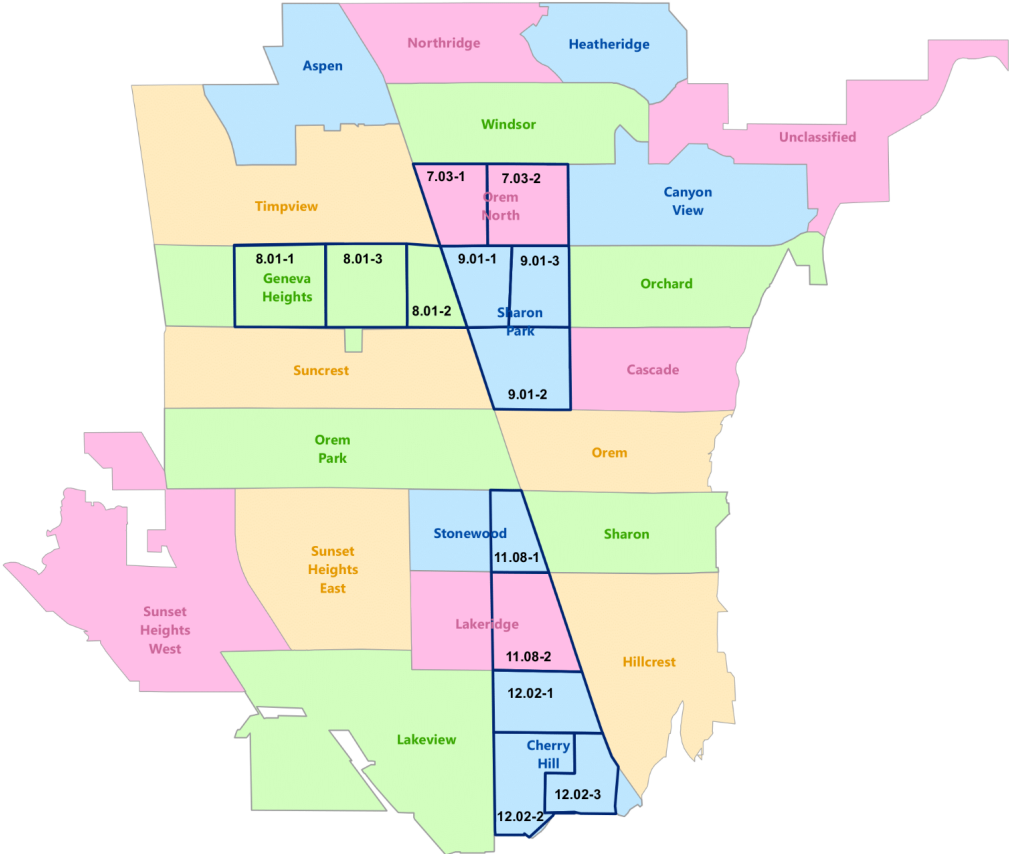
See Table 1 for a list and Figure 1 for a map of the qualifying LMI census tracts in Orem, and see the appendix for additional statistics regarding these areas.

**Table 1: CDBG-Funded Code Enforcement Census Tracts**

Tract	LMI Households
7.03	51.5%
8.01	51.3%
9.01	64.4%
11.08	62.2%
12.02	63.6%

*The City of Orem funds its code enforcement efforts in these 5 census tracts using CDBG funds.*

**Figure 1: CDBG-Funded Code Enforcement Areas**



*Note: Figure 1 displays all of the City's neighborhoods, along with the qualifying LMI code enforcement areas outlined on the map.*

## Neighborhood Improvement Efforts

The City provides additional neighborhood improvement efforts in the six City neighborhoods where the qualifying LMI census tracts are located. These six neighborhoods are 1) Orem North, 2) Geneva Heights, 3) Sharon Park, 4) Stonewood, 5) Lakeridge, and 6) Cherry Hill. The City of Orem provides the following initiatives to provide a higher level of support in these six neighborhoods and/or in the City as a whole.

## Current Initiatives

- One of the City's three Neighborhood Improvement Officers is assigned to exclusively work in the qualifying LMI neighborhoods.
- The City created a "Neighborhood Preservation Resource Guide" to provide information about resources that are available to residents (such as home improvement and rehabilitation programs, building material resources, citywide clean-ups, and much more). The City also created a "Good Neighbor" brochure that includes explanations of city codes surrounding issues such as abandoned vehicles; snow removal; illegal accessory apartments; and many more issues. These brochures are distributed to residents in these neighborhoods at community events and in schools.
- The City created a landlord licensing program to address ongoing issues in regards to rental properties. This program provides up-to-date contact information for all landlords in Orem, enabling the City to quickly contact landlords if there are any issues with their properties and ultimately resolve these issues. This program is of particular benefit to the qualifying LMI neighborhoods, as these neighborhoods generally have higher rates of rental properties than other neighborhoods in the City. The City also provides a quarterly update to landlords, providing code compliance and other important neighborhood information.
- The City partners with the Utah Valley Interfaith Association, the Utah Valley Home Builders Association, the Fuller Center for Housing, Habitat for Humanity of Utah County, and other community organizations to provide renovation and beautification services to homes and properties in these neighborhoods. For example, the City partners with the Fuller Center for Housing and Habitat for Humanity of Utah County to participate in the "Big Sweep," where we identify streets in eligible neighborhoods with code issues and implement day-long projects to clean them up.
- The NIT works with Orem City's Community Policing division to hold "Police Picnics" in target neighborhoods to enable residents to interact with neighbors and NIT officers, share concerns, and ask questions.
- The NIT collaborates with the City's Public Works Department to hold in-person and virtual public community workshops and programs addressing property maintenance and other community needs.
- The City's Community Services Division partners with the Community Policing Division to provide a "Reading with Police & Fire" program where police officers and firefighters read to and form positive relationships with elementary school children in these neighborhoods. In addition, the Community

Services Division has partnered with Public Safety to implement a “Donuts with Police & Fire” program at neighborhood schools in target areas. The City’s Community Services and Community Policing Divisions work together to maintain strong partnerships with local schools in these neighborhoods, and to provide each school with resources they specifically need.

- The City amended an ordinance to reduce the required amount of front yard grass in the City from 70% to 50%. This encourages residents to implement xeriscaping to reduce their water usage, improve property maintenance, and benefit the environment.
- The City manages a Critical Home Repair & Housing Rehabilitation Program that provides homeowners with grant and/or loan funding up to \$15,000 to repair critical damage to homes or eliminate specific and immediate hazards to health, safety, and/or sanitation. This program is available to all homeowners making less than 80 percent of the Area Median Income (based on HUD’s yearly MSA numbers) living in the City of Orem. Depending on the homeowner’s income, different grant or loan amounts and repayment terms are available.
- The City holds annual citywide spring and fall cleanups to provide residents with ample opportunities to dispose of household waste (regular trash, green waste, and metal recycling bins). This program allows residents to dispose of waste that might otherwise clutter their homes and/or yards. The Community Services Division can also bring dump trailers to residential properties to help with property and neighborhood clean-ups.
- The Community Services Division and the Community Policing Division hold annual meetings with neighborhood leaders in each of the qualifying areas to discuss and resolve code issues that are specific to each of the neighborhoods.
- The City has a “Property All-Star Program” to show appreciation to and recognize homeowners and/or landowners that have improved their once-blighted properties to bring them up to a community standard or beyond. Winners are awarded with generous prizes and other recognitions. This program incentivizes property owners and renters to improve and maintain their once-blighted properties. NIT officers also post “star” door hangers showing appreciation to residents that make an effort to maintain their homes and properties to a community standard.
- Community Services maintains a neighborhood-related page on its website providing all neighborhood information in a single place ([orem.org/neighborhoods](http://orem.org/neighborhoods)). Orem residents can use this page to learn about neighborhood programs, events, and codes; apply for the Critical Home Repair and Home Rehabilitation Program; learn about home improvement tips; find neighborhood-related resources; view the City’s neighborhood plans; report code violations; and more.
- The City has a “Resident Resources” page on its website ([orem.org/residentresources](http://orem.org/residentresources)) to help residents in need find beneficial community resources.
- The City created a Neighborhood Commission to represent the nine neighborhood districts. Four of the commissioners represent the qualifying LMI neighborhoods, giving a voice to residents in CDBG-qualifying areas.
- The City has a mobile tool library to bring tools (including yard tools, paint equipment, power tools, and

more) to residents. This enables residents in these neighborhoods to more easily access the tools they need to improve their homes and property.

- The City has created a “Preservation Team” made up of City-wide staff to assist those in need (such as seniors, disabled individuals, etc.) in resolving existing code violations or warnings. This ensures that those who need help are able to resolve code problems in a timely manner.
- The City has partnered with United Way of Utah County to promote United Way’s EveryDay Strong program. The program strives to build resilient children and youth in our community. The City has made a strong effort to promote this important program in our target neighborhoods through awareness events and school trainings.
- Community Services and NIT staff, along with the Orem Community Policing Division and other police officers, spend three early mornings in late January to assist with HUD’s annual Homeless Point-in-Time Count. This partnership also sponsors an annual Homeless Services Drive during the holidays to secure donations for homeless residents in Orem.
- Each year in September, the City partners with United Way of Utah County for Day of Service and Day of Caring service projects where city employees and volunteers complete two large home improvement projects for low-income senior homes, among other projects.
- The City has partnered with Alpine School District on a five-year grant program to increase student test scores, career achievement plans, and other important measures at schools located in qualifying neighborhoods.
- The City implemented a tree program titled “Rooted in Orem” where qualifying LMI homeowners can apply for a \$150 voucher towards a tree from a local nursery.
- The Community Services Division is developing a new grant program titled “Neighborhood Refresh” where low-income homeowners (primarily in target neighborhoods) can apply for grants up to \$500 for landscape, exterior, safety, and security improvements.

These initiatives aim to connect residents with the resources they need to preserve the appearance and value of their homes and property, to encourage community pride, and to make the City a safe and clean place to live.

Importantly, while the initiatives that directly deal with code enforcement in the CDBG-qualifying areas have been or will be funded using dedicated CDBG code enforcement funds, all of the remaining initiatives will be funded or provided by general CDBG funds; private and in-kind donations; individual, foundation, or corporate partnerships; or other city funds.

## **Conclusion**

With the assistance of CDBG and other funding, Orem’s Neighborhood Improvement Team is able to provide a high level of reactive and proactive code enforcement in deteriorating LMI neighborhoods. This enables the NIT to efficiently discover and alleviate code violations in the areas that need it most and significantly improve these neighborhoods and our City.

Though this plan outlines proactive strategies based on current information and data, the City will re-evaluate this plan each year to ensure appropriate plans and goals. The City will adjust this plan as needed to make the City's use of CDBG funds for code enforcement as effective as possible. Orem's Community Services Division and the NIT will keep records to document the City's initiatives in these neighborhoods to ensure that the City uses resources effectively.

As the City improves its efforts to address specific types of issues in each of these neighborhoods, the City will improve the efficiency of the code enforcement program, help property owners reduce code violations, improve neighborhoods, and ultimately protect the general welfare of the City and its citizens, businesses, and visitors.

## Appendix

Neither the City of Orem nor the State of Utah have a definition of “deterioration.” Thus, to determine which areas of the City are “deteriorating” and thus eligible to use CDBG funds for code enforcement, the City relied on the HUD definition of “slum, blighted, deteriorated, or deteriorating...under state or local law”:

- At least 25 percent of properties throughout the area experience one or more of the following conditions:
  - Physical deterioration of buildings or improvements;
  - Abandonment of properties;
  - Chronic high occupancy turnover rates or chronic high vacancy rates in commercial or industrial buildings;
  - Significant declines in property values or abnormally low property values relative to other areas in the community; or
  - Known or suspected environmental contamination.

The remainder of this appendix includes data about the city’s 5 LMI census tracts and how they meet this definition of “deterioration” and are thus eligible to use CDBG funding for code enforcement.

### *Deterioration Based on Home Age and Values*

The City used 2020 5-year estimates from the United States Census Bureau’s data<sup>3</sup> to estimate the median household income, median age of homes, and median value of homes in Orem’s 5 LMI census tracts compared to all of Orem. See Table 1 below.

**Table 1: Supplemental Data for Qualifying LMI Census Tracts**

<b>Tract</b>	<b>Median Household Income</b>	<b>Median Year Homes Built</b>	<b>Median Home Value (Dollars)</b>
7.03	\$58,286	1980	\$248,400
8.01	\$54,654	1981	\$220,500
9.01	\$48,272	1973	\$216,800
11.08	\$37,477	1980	\$198,000
12.02	\$47,240	1979	\$250,800
<b>Orem (All)</b>	<b>\$65,622</b>	<b>1984</b>	<b>\$296,900</b>

### *Vacancy (Abandonment of Properties)*

The City also used data from the University of Utah’s Kem C. Gardner Policy Institute<sup>4</sup> to estimate overall occupancy, owner occupancy, renter occupancy, and vacancy rates for the 5 qualifying census tracts compared to all of the other tracts in Orem. The data in Table 2 reflects estimates as of July 1, 2019.

<sup>3</sup> <https://www.census.gov/acs/www/data/data-tables-and-tools/data-profiles>.

<sup>4</sup> “Salt Lake and Utah County Subcounty Estimates, 2010 – 2017.” Kem C. Gardner Policy Institute, <https://gardner.utah.edu/demographics/salt-lake-and-utah-county-subcounty-estimates-2010-2019/>.



**Table 2: Supplemental Data for Census Tracts**

Census Tract	Total Housing Units	Occupied Housing Units	Owner-Occupied Housing Units	Renter-Occupied Housing Units	Vacant Housing Units
<b>Code Enforcement in Some or All Block Groups Funded by CDBG Funds (Deteriorating Areas)</b>					
7.03	1,653	1,581 (95.6%)	835 (50.5%)	746 (45.1%)	72 (4.4%)
8.01	1,734	1,655 (95.4%)	1,011 (58.3%)	644 (37.1%)	79 (4.6%)
9.01	1,965	1,855 (94.4%)	728 (37.1%)	1,127 (57.4%)	110 (5.6%)
11.08	1,338	1,281 (95.7%)	293 (21.9%)	988 (73.8%)	57 (4.3%)
12.02	1,855	1,795 (96.8%)	611 (32.9%)	1,184 (63.8%)	60 (3.2%)
<b>All Other Census Block Tracts</b>					
All Other Tracts in Orem	20,203	19,460 (96.3%)	12,702 (62.9%)	6,757 (33.4%)	743 (3.7%)

Table 2 shows that the 5 qualifying census tracts generally have a lower overall occupancy rate, lower owner occupancy rate and higher renter occupancy rate, and higher vacancy rate than the respective Orem averages. This data serves to reinforce that the occupancy patterns in the qualifying LMI census tracts (with lower owner occupancy, higher renter occupancy, and higher vacancy rates) serve as indicators of deterioration.

***NPU Call Statistics***

Since 2018, the City’s Neighborhood Improvement Team has evaluated call data to ensure that the higher level of support they are providing in the CDBG-eligible census block groups is justified. The following charts illustrate cases in the CDBG-funded areas compared to the rest of the City since July 2021 (historical data is available upon request).

**Table 3: NIT Statistics for Eligible Areas: July – September 2021**

	CDBG-Funded Areas	Total Citywide	% in CDBG-Funded Areas
Cases	185	442	41.9%

**Table 4: NIT Statistics for Eligible Areas: October - December 2021**

	CDBG-Funded Areas	Total Citywide	% in CDBG-Funded Areas
Cases	35	175	20.0%

**Table 5: NIT Statistics for Eligible Areas: January - March 2022**

	CDBG-Funded Areas	Total Citywide	% in CDBG-Funded Areas
Cases	87	307	28.3%

**Table 6: NIT Statistics for Eligible Areas: April - June 2022**

	CDBG-Funded Areas	Total Citywide	% in CDBG-Funded Areas
Cases	97	342	28.4%

**Table 7: NPU Statistics for Eligible Areas: July - September 2022**

	CDBG-Funded Areas	Total Citywide	% in CDBG-Funded Areas
Cases	60	248	24.2%

### ***Spot Survey in 6 Neighborhoods***

In 2020, the City worked with local university students to conduct a spot survey of homes in the 6 neighborhoods that met LMI qualifications at the time. Students gathered information about 60 homes in each of the 6 neighborhoods. See Table 8 for information gathered from the spot survey. *Note: Due to the new census, some target neighborhoods have changed since this time. The City plans to work with university students to conduct future similar surveys in qualifying neighborhoods.*

**Table 8: Data from Spot Survey of 6 Neighborhoods**

Neighborhood	Average Property Build Year (Survey of 60 Homes)	% of Rental Properties (Survey of 60 Homes)
Sharon Park	1982	25%
Geneva Heights	1982	22%
Suncrest	1981	28%
Stonewood	1985	12%
Lakeridge	1982	23%
Hillcrest	1982	35%

While this data only represents a sample of each of the 6 neighborhoods, it demonstrates that these neighborhoods tend to have older homes, and a high percentage of rental properties. Additionally, the students documented that at least 20-30% of the homes they surveyed in each neighborhood were not well-maintained and/or had some sort of code violation issue.

### **Conclusion**

The City of Orem funds its code enforcement area in the 5 qualifying LMI census tracts using CDBG funds. The data in this appendix shows that these areas are also “deteriorating” based on home age, home value, rental rates, and vacancy rates. The City plans to continue to work with university students in the area to conduct a more complete inventory of these neighborhoods to determine the true amount of “deterioration” in each of these neighborhoods. The City will subsequently focus its CDBG-funded code enforcement efforts and neighborhood improvement efforts in the areas with the most deterioration to improve the City’s code enforcement program and improve our neighborhoods and City as a whole. The City is committed to the

Neighborhood Improvement Team goals to protect the health and safety of the public; foster neighborhood stability; preserve the appearance, character, and beauty of neighborhoods; encourage community pride; preserve property values; and protect the general welfare of the City and its residents, businesses, and visitors.