AAP Schedule

Jan 28th, AOG AAP submitted to HCD for review and public notice posted

Mar 1st, AOG public hearing and final version of AAP submitted to HCD

2024 Five County Association of Governments CDBG Annual Action Plan

For July 1 2024 - June 30 2025

Five County Association of Governments

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Contents

Executive Summary

Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified in the Consolidated Plan. They can establish strategy for investment of its U.S. Department of Housing and Urban Development (HUD) resources and other resources linked to activities directed at the community development, housing, and homeless service's needs. The goal of the Annual Action Plan is to develop viable communities by providing decent housing, a suitable living environment, and expanding economic opportunities principally for low-and moderate-income persons.

The Five County Annual Action Plan describes activities completed in the past year and provides an opportunity for the region to review and update goals year to year. The progress made in the last year is complemented by an understanding of the expected funds for the upcoming fiscal year and a discussion of the projects to be rated and ranked. As a result of writing this plan, Five County staff have reviewed the successes and challenges to economic development, housing, and CDBG activities that exist in the region and can take action to address these challenges. Such actions could include adjustments to rating and ranking criteria, regional priorities, providing learning opportunities and information, and engagement with jurisdictions in the region.

This document is the Five County Association of Governments (AOG) contribution to the Utah Annual Action Plan assembled by the State of Utah's Housing and Community Development office, which reports on Community Development Block Grant activities statewide.

Work Completed

The Five County Association of Governments Community and Economic Development staff provide technical planning assistance to Low-and Moderate-Income communities in the region. Our efforts also support those communities in completing Community Development Block Grant (CDBG) applications to fund projects in the region. During the 2023 Fiscal Year, the FCAOG staff activities included:

- Training on Capital Improvement Planning in the region which included updates to the CASI and the prioritization of projects for each entity.
- Participating with the local Washington County Housing Action Coalition (HAC) and Local Homelessness Council (LHC).
- Updating of FCAOG CDBG Rating and Ranking Criteria.
- How to Apply Workshops hosted for eligible CDBG applicants.
- Hold consultation meetings with each CDBG applicant in Five County region.
- Support community applications for CDBG funds.
- Began implementation of the Housing Revolving Loan Fund.
- Began Implementation of the Housing Rehabilitation Program
- Meeting with each community with local planning needs about how to better assist them with their local plans.

One of the goals of the FCAOG this year was to improve communication with our location jurisdictions, including counties, cities, special service districts, housing authorities, and any other entity that could

benefit from our resources. In this goal, the AOG has been very successful as we have met with nearly all our local community leaders at least once, and in most cases, several times during the year, to assess the needs of their communities and to help us attain more knowledge about how we as an organization can better help them. This will be a continued goal as we move forward.

Outreach and Consultation

The public has been offered several opportunities to engage and provide comments on AOG CDBG activities, plans, and policies. Also, AOG contacts organizations, municipalities, counties, special service districts, and nonprofits regularly for them to communicate their needs and challenges through meetings and communication for various planning processes, support and to maintain ongoing relationships with organizations throughout the region. This provides staff with an improved understanding of the community's needs, ongoing projects, and actions the AOG can take to support these organizations in addressing identified problems.

In addition, the public has been offered several opportunities to engage and provide comments on AOG CDBG activities, plans, and policies. The AOG hosts public hearings and comment periods throughout the year. The AOG also works with local nonprofits, service districts, and other service providers to understand the needs to be able to provide community services.

Expected Resources and Allocation Priorities

The Five County region is expecting to receive approximately $907,269 in CDBG funding, with $0 remaining from the previous year's funding and program income. These dollars will be used throughout the region to address community challenges and needs. The region has identified allocation priorities for this funding by evaluating community development capital projects, requested from individual community, county, and special service district One-Year Capital Improvement Plans. Priorities include: 1) Public Utility Infrastructure; 2) Public Safety Activities; 3) Community Facilities; 4) LMI Housing activities; 5) Parks and Recreation Projects; and 6) Projects to Remove Architectural Barriers to ADA. Priorities are reflected in the regional Rating and Ranking Criteria.

County level priorities are determined during the application cycle, where comments from the Five County Steering committee members for a county (includes a commissioner, mayor, and school board member) prioritize the applications which are submitted from communities in that respective county. The responses are aggregated, and a score is applied during the rating and ranking process to reflect the highest priority projects from that county.

Local level priorities are described in the required attachment of their capital improvements list to the CDBG application.

Housing

The Five County Association of Governments assists communities in drafting Moderate-Income Housing Plans to improve understanding and remove barriers to affordable housing in the community. The AOG has prioritized assisting LMI communities or communities with limited planning staff. The AOG has assisted with the writing and improvement of the housing plans of nearly all the smaller communities in

the region. Although the need for the writing of the plans has lessened in 2023, it still remains a priority for those that require assistance with those plans.

An element of the Moderate-Income Housing Plans includes assessing the barriers that exist in a community to developing affordable housing options. These can include zoning and land use policies, requirements in the development process, available buildable land, among other barriers. This report discusses common barriers experienced in the region with potential strategies to address or reduce the barrier.

There are three Public Housing Agencies in the Southwestern Utah region, which assist LMI households with housing accommodation and aid: Beaver Housing Authority, Cedar City Housing Authority, and St. George Housing Authority. The St. George Housing Authority serves an entitlement community and is not reported on in the Five County Annual Action Plan. The Beaver Housing Authority is the only Public Housing Agency that owns public housing in the non-entitlement area. Regular communication with the housing authorities has contributed to consistent prioritization of affordable housing in the Rating and Ranking Criteria for CDBG funding in the Five County Region. Consultation with housing authorities informs the AOG of challenges and needs that communities have in providing affordable housing.

Outreach

The Five County Association of Governments regularly engages with the public and jurisdictions in the region to identify priorities, challenges, and needs within the region. This section reviews the consultation and citizen participation efforts for the Five County Report for the 2023 Utah Annual Action Plan and identifies findings to inform AOG practices and priorities.

Consultation

The Five County Association of Governments continued consultation and coordination with agencies in this region and invited the public to participate in the development of this one-year action plan. A primary purpose of the Association of Governments is to coordinate federal, state, and local programs across southwest Utah. Much of this coordination involves aspects of the consolidated planning process. Efforts made to prepare the Five County report for the 2023 year, include:

- Collaboration with the Five County Community Action Partnership to identify housing and homeless needs and create goals.
- Monthly reports from congressional staff as a standing agenda item at Steering Committee meetings to keep local officials informed of congressional actions, including housing and urban development initiatives.
- Representation on the Utah Small Cities CDBG Policy Committee, which develops policy for the implementation of the Utah Small Cities CDBG program.
- Identification of the region’s vision and goals.
- Outline the strategic direction of the action plan.
- Identification of priority projects for implementation.

- Implementation of the monthly Mayor's meeting to get input from local rural mayors in the community.
- Representation on the Vision Iron County Board.
- Representation on the Zion Regional Council.

The following organizations and groups were consulted from the Five County Region for the report:

- The Five County Association of Governments Rating and Ranking Committee.
- County, City, and Town jurisdictions
- Special service districts
- Non-profits
- Housing Authorities
- Local Homeless Coordinating Committees

The Rating and Ranking Committee for the Five County Region has the responsibility for setting policy and directing CDBG efforts. Presentations are made to members throughout the year, outlining Consolidated Plan and Annual Action Plan requirements and updates, Rating and Ranking Criteria input and approval, as well as requesting input on plan elements. This committee is responsible for formal approval of the Five County report for the statewide Consolidated and Annual Action Plan updates.

Jurisdictions were contacted to provide capital investment list updates to include in this report. Jurisdictions included communities (mayors & clerks of 38 cities/towns), counties (commissioners, clerks, & administrators of five counties), special service districts, housing authorities, and economic development professionals throughout the region. Many jurisdictions were contacted directly by AOG staff to assist in completing required information. Community and Economic Development staff will meet with local elected officials and/or staff throughout the region to discuss the community development needs indicated in their jurisdiction's updated capital improvements lists during the 2021 year, to assist in the completion of capital improvement projects throughout the region. Assistance from the AOG staff includes, but is not limited to; planning assistance, environmental review assistance, site mapping, support in strategizing and understanding funding sources, and assistance in completing CDBG applications.

Other groups that Five County staff consult with on an ongoing basis that directly and indirectly contribute to the Five County report for the 2023 Utah Annual Action Plan update include, Cedar City Housing Authority, Beaver Housing Authority, Sun Country Home Solutions (NeighborWorks Mountain Country Home Solutions). Consultation with Housing Authorities shares the successes, challenges, and needs of the organizations providing affordable housing assistance to communities. The AOG addresses these conversations in the rating and ranking policies and procedures and planning activities that prioritize funding and connect communities to information about affordable housing.

Results

Consulting with organizations and agencies throughout the Five County Region offers AOG staff an understanding of the region's affordable housing and community development priorities. With this

information, the AOG staff can relay data-driven recommendations, plans, and resources to local entities to make appropriate goals for CDBG program execution. Consultation informs the content discussed in this document.

Citizen Participation

A 30-day public comment period soliciting public input of the draft Five County report for the Utah 2024 Annual Action Plan opened on January 30, 2024, and extended through February 29, 2024. The public was encouraged to review the draft plan and leave staff with comments, concerns, or questions. Staff responded to comments made. Comments made, staff responses, and edits made are documented in the final draft of the report.

A copy of the report draft was available for public review during the 30-day comment period on the AOG website, attached to the Utah Public Meeting Notice website post, and at the Five County Association of Governments office: 1070 West 1600 South, Building B., St. George, UT 84770.

At the conclusion of the public comment period, a public hearing was held. The hearing was advertised on the State of Utah's Public Meeting Notice Website and on the Five County Association of Governments website. Appendix B shows the notice for the comment period and hearing. The public hearing was held on _____PM in a virtual format. The document was presented and discussed.

Members of the Steering Committee and others in attendance were encouraged to visit the Five County AOG website to review the complete document and associated attachments. The AOG Rating and Ranking Committee approves the Five County report and capital improvements list.

(Please list your plan to involve the organizations you work with in the creation of the Annual Action Plan)

(Please list the organizations you consulted and the result of the consultation)

(Please list the organizations consulted which involve broadband and the digital divide)

(Please list the consultations which involve natural hazards and climate)

(Please specifically describe cooperation and coordination with local governments)

Citizen Participation

(Please summarize citizen participation process and how it impacted the creation of the Annual Action Plan)

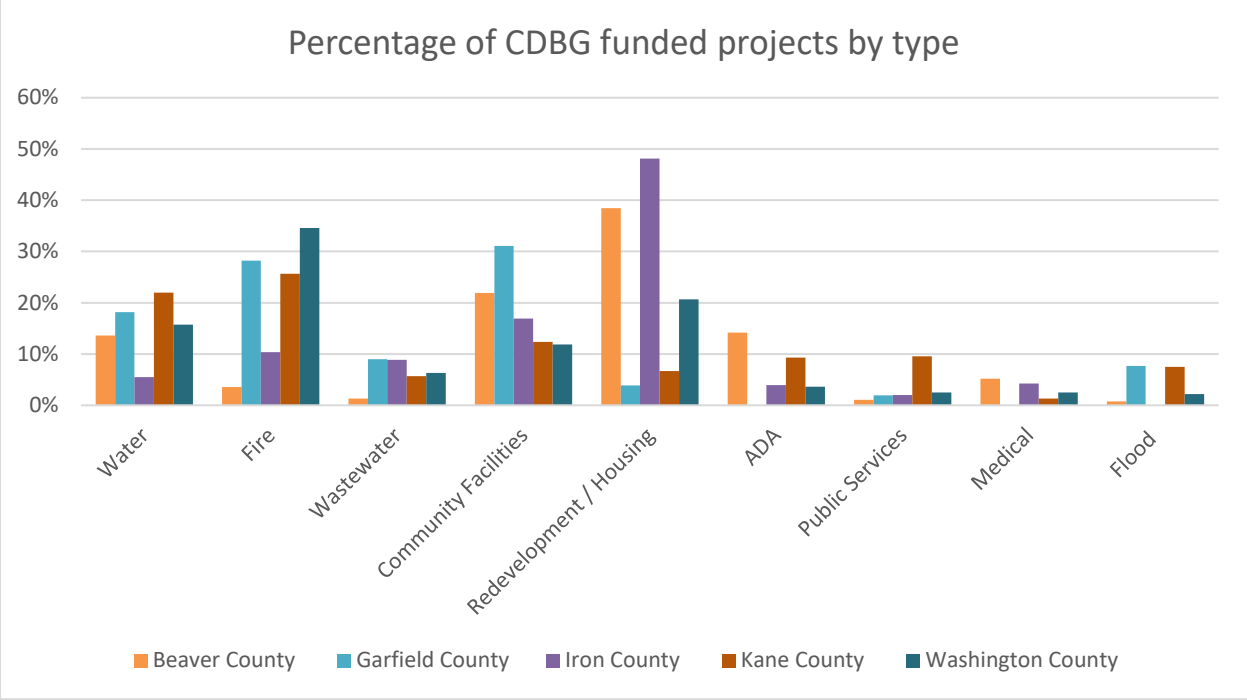
(Please list all public outreach efforts include outreach through newspaper ads, internet outreach, public meetings and public hearings. Especially include how you advertise the 30 day public comment period and public comment meeting. Include specific dates and the text of the outreach/ads)

Expected Resources

Annual Allocation:	**$907,299**
Program Income:	$0
Prior Year Resources:	$0
Total:	$907,299

Between 1982 and 2023, communities in the Five County region have received $25,007,747 of Community Development Block Grant funding for community development projects designed to improve living conditions for those who are of low-to-moderate income. This amount does not include allocations of CDBG funds for regional projects and funding that came directly to the AOG. Past CDBG projects funded include water, fire, wastewater, community facilities, redevelopment/ housing, ADA, public services, medical facilities/ambulances, and flood control related projects. Each county has had a variety of project types in the program history, showing the varying community development needs in the region. Figure 1 illustrates the past CDBG projects completed by county.

Figure 1: County CDBG share of funding allocations by project type.



Source: Five County AOG 2024 CDBG funding records

The Five County Association of Governments is expected to receive $907,299 in the 2024 program year. This value is calculated by applying an allocation formula approved by the State CDBG Policy Committee, using the estimated amount of dollars that the State of Utah will receive from the Small Cities CDBG Program. The Five County AOG does not generate program income from the CDBG programs administered in the region.

Prior Years Resources

There are no prior year's resources to report for the Five County Association of Governments.

Leveraging Funds

In the Five County region communities may apply for awards of up to $5000,000 for community projects that qualify for the CDBG program according to the guidelines. To maximize the limited CDBG funds in the Five County Region, it is critical that applicants leverage CDBG funds with other funding sources, such as the Community Impact Board loans or grants, other state, or federal grants, and local municipal funds. The CDBG Rating & Ranking criteria utilized a "Percent of Project Match" as rating & ranking metric to encourage applicants to leverage funds. Applicants with a greater percentage of non-CDBG funds in the budget are awarded points under the Percent of Project Match element. This metric is scaled based on jurisdiction population, to ensure equitable ranking for jurisdictions with lower populations in the region, granting equal points for a smaller share of matching funds in qualifying jurisdictions. See Appendix D for the Five County Rating and Ranking Policies and Criteria.

(Please include the total amount of CDBG funding you expect to have for the program year)

(Narrative Description of the funds)

(Plan to leverage funds with private, other state, and local funds, including any matching requirements)

Goals & Objectives

Goals and objectives are based on anticipated resources, past performances, and submitted applications. Outcomes of the goals may vary depending on the actual allocations received. Additionally, the Five County AOG staff will write Moderate-Income Housing Plans for several communities. The Goals indicator worksheet does not contain a field for such activities.

Goal Outcome Indicator	Quantity	Unit of Measurement
Public Facility or Infrastructure Activity other than low/moderate income housing benefit		Persons Assisted
Public Facility or Infrastructure Activities for low/moderate income housing benefit	0	Households Assisted
Public service activities other than low/moderate income housing benefit	0	Persons Assisted
Public service activities for low/moderate income housing benefit		Households Assisted
Facade treatment/Business building rehabilitation		Business
Rental units constructed		Household Housing Unit
Rental units rehabilitated	4	Household Housing Unit
Homeowner housing added	4	Household Housing Unit
Homeowner housing rehabilitated	20	Household Housing Unit
Direct financial assistance to homebuyers	0	Households Assisted
Homelessness prevention (Includes Short Term Rental Assistance)	0	Persons Assisted
Businesses assisted	0	Businesses Assisted
Jobs Created/retained		Jobs
Other		Other

One-year goals for the number of households supported through:	
Rental assistance	0
The production of new units	0
Rehab of existing units	0
Acquisition of existing units	4
Total	4

Allocation priorities

The Five County Association of Governments determines an allocation priority for the funding of CDBG applications through consultation and engagement with organizations, jurisdictions, and the public. AOG staff evaluate the Rating and Ranking Criteria, informed by consultations, to provide recommendations to the Rating and Ranking Committee to set priorities for the region. The Rating and Ranking Criteria are used to objectively select projects that will meet the region's priorities for funding. These criteria allow

AOG staff to uniformly evaluate applications annually and allow for regional priorities to be reflected in the selection process.

Rating and Ranking Criteria

The Five County Association of Governments uses a comprehensive Rating and Ranking matrix to determine the priority for funding of all CDBG applications. The Rating and Ranking criteria used in the Five County Region assesses a jurisdiction's project priority, LMI population, Civil Rights compliance, application quality, and several other metrics. The criteria are approved by a group of local elected officials functioning as the Rating and Ranking Committee (RRC). Rating and Ranking Criteria benefit the Five County AOG and CDBG applicants with an objective process that considers project maturity, regional priorities, and the goals of the CDBG Small Cities Program in the selection process. The matrix and recommendations for FY 2022 application evaluation was presented to the Rating & Ranking Committee for prioritization in August of 2021. See Appendix D for a copy of the Fiscal Year 2022 Rating & Ranking Criteria, Policies, and Guidelines.

The Five County AOG held two How-to-Apply Workshops to support applicants to complete the CDBG application. All communities with a population of less than 50,000 people, many special service districts, and many non-profit organizations in the Five County region are annually invited to attend the regional CDBG How-to-Apply Workshops via email and mailed invitation. All eligible entities and sub-recipients can access application manuals and material on the Utah DWS website, the Five County AOG office, the How-to-Apply workshops, and by contacting the AOG Community and Economic Development staff.

Regional Priorities

Regional project priorities are identified through One-Year Capital Improvement Plans that AOG staff collects from individual community, county, and special service districts, which identify the eligible CDBG projects on the capital improvement lists, shows which communities would like to utilize CDBG funds for their projects, and specifies other applicable funding sources for the projects contribute to local priority determination. In addition to the collection of Capital Improvement Plans, the AOG staff requested feedback on priorities directly from the elected officials of the region's cities, counties, and towns. This data was aggregated and documented in a memo to the Executive Director and Finance Committee, who set the regional priority, per the regional policies and procedures. The 2022 Program year priorities in order are: 1) Public Infrastructure; 2) Public Safety Activities; 3) Community Facilities; 4) LMI Housing activities; 5) Parks and Recreation; and 6) Projects to remove Architectural Barriers.

Community Development

A variety of community development activities can be accomplished utilizing CDBG funds. The following list of eligible CDBG activities includes a brief description of the project type, as well as regional needs and priorities related to each activity.

- **Public Housing -** Regional efforts will continue to focus on projects designed to provide for the housing needs of very-low and low-moderate income families. This may include the development of infrastructure for LMI housing projects, development of Moderate-Income Housing Plans, land acquisition or the actual construction of housing units for elderly, low-income and homeless individuals, housing rehabilitation.

- **Public Infrastructure -** Regional efforts will focus on increasing the capacity of water and other utility systems to better serve the customers and/or improve fire flow capacity. Wastewater disposal projects are included in this category. Jurisdictions throughout the region will continue to focus on addressing transportation related projects, i.e., streets/bridges, curb, gutter, sidewalks to address drainage issues and airport improvements. The use of CDBG funds for transportation projects is extremely limited due to the nature and higher level of funding needed.

- **Public Safety -** Efforts will be concentrated on addressing projects related to protection of property, including flood control or fire protection improvements in a community. Priority should be given to developing additional fire protection in underserved areas.

- **Community Facilities/Public Services -** Regional support will be provided to jurisdictions undertaking construction of projects such as senior citizens centers, health clinics, food banks/shelters, and/or public service activities. These activities traditionally have no available revenue source for funding and have typically been turned down by other funding sources. This category does not include facilities that are primarily recreational in nature.

- **Parks and Recreation -** Jurisdictions will continue to foster projects designed to enhance the recreational quality of a community i.e., new picnic facilities, playgrounds, community recreation centers, trails, etc. While parks are an important element in a community, the focus of funding in this Region is generally directed towards needed infrastructure, facilities, and affordable housing.

- **Planning -** Jurisdictions throughout the region will continue to direct planning efforts towards feasibility studies and various planning for projects such as storm drainage, water system master plans, senior citizen center design, city housing data base and capital facilities plans.

- **Economic Development -** Some of the jurisdictions in the Five County Region are taking steps to rehabilitate historic buildings and/or museums that play a vital role in terms of historic community values and to foster tourism in the area. The Five County Economic Development District's Comprehensive Economic Development Strategy (CEDS) identifies the regional economic development priorities found in the CEDS document.

Projects to be Rated and Ranked

The following communities are applying for CDBG in 2024. It is anticipated that several of the projects will be fully or partially funded, with projects completed within HUD approved timelines, if the Five County region receives the anticipated amount of $907,299.

- Glendale Town — CDBG funds will be used to replace a water well that is failing. The well serves as the primary water source for the town.
- Brian Head Town — The town will purchase an exhaust system for the fire station.
- Cedar City on behalf of Cedar City Housing Authority – CDBG funds will be used to acquire 2-3 units to be used for low- and moderate-income housing.

- Five County AOG — Consolidated Plan Planning, Administration, Rating and Ranking - AOG staff will aid communities by updating the regional Consolidated Plan, CDBG program administration, develop capital improvement lists, and conduct project Rating and Ranking.
- Five County AOG — CED staff will develop and update community Moderate Income Housing Plans, provide technical planning assistance, and conduct planning training to communities.

LMI Communities

The Utah State Housing and Community Development Office, which administers the State Small Cities CDBG Program throughout Utah utilizes a Pre-approved LMI Community List taken from the American Community Survey (ACS) to document concentrations of LMI population for towns and cities. The Pre-approved LMI communities from the Five County region include:

- Iron County
- Garfield County
- Cedar City
- Enoch City
- Brian Head Town
- Panguitch City
- Hatch Town
- Boulder Town
- Henrieville Town
- Escalante Town
- Alton Town
- Glendale Town
- Hildale City
- La Verkin City

Pre-approved LMI communities can apply for community wide projects without completing a survey, although a survey is recommended to verify LMI status.

Communities not on the state preapproved list, or preapproved communities applying for site specific projects must complete and certify an income survey to determine eligibility for CDBG funds. The determination of LMI status by surveys for community-wide or site-specific projects is for a limited period of eligibility only. In cases where the survey confirms a community's LMI percentage is 60% or greater, that community may use the survey results for the next four CDBG program years. Communities where the percentage is between 51% and 59%, the results are valid for that year and the following two program years.

Utah is one of the fastest growing states in the United States, with Southern Utah one of the fastest growing areas in the state of Utah, and communities may experience significant population change

during the valid survey period. It is the responsibility of the city, town, or county to provide accurate population data from reputable sources. Significant changes in population in the community with a valid survey may require additional surveys to demonstrate the impacts of the population change on the LMI eligibility of the community.

Tropic Town and Beaver City communities are currently determined as LMI based on the results of a CDBG income survey.

Awarding Funds

Applications which are complete by the submission date will be reviewed by the State Housing and Community Development CDBG staff for completion. Following this review, complete applications are Rated and Ranked by the Five County AOG Community and Economic Development Staff. Applicants will be notified by the Five County AOG of their approval for funding and of any necessary next steps to complete their application.

Public Housing

The Five County Association of Governments works with communities and organizations to better understand and enable the inclusion of public rental housing and affordable housing throughout the region. Affordable housing and Public Rental Housing are defined in Figure 2. The regional long-range vision of the Five County Association of Governments regarding affordable housing is described as follows:

- *We envision the Five County Region fortified with vital and healthy communities, which provide residents with quality housing that is safe and affordable, located in aesthetically pleasing neighborhoods which provide sanctuary and stability*.
    - ***Housing is considered affordable when a household is not paying more than thirty percent (30%) of their total adjusted gross income (AGI) toward their monthly housing costs, including mortgage or rent, utilities, insurance, and other housing expenses.***
    - ***Public Housing is generally inhabited by those of low- and moderate- income. The housing stock assessment provides an increased opportunity to meet the needs of individuals within these income categories***.

The AOG promotes their housing vision by working with communities to draft and update Moderate-Income Housing Plans to better understand the current housing stock and anticipate housing needs in future, especially for low-and moderate-income households. To regularly fund housing projects in the region, the Five County CDBG Rating and Ranking system criteria awards points to housing projects. The Five County Community and Economic Development staff regularly engages with the housing authorities in the region to discuss their needs and future projects.

Five County Region Housing Authorities

Beaver City Housing Authority and Cedar City Housing Authority are the two housing authorities operating within the non-entitlement areas of the Five County Region. St. George Housing Authority is the only housing authority in the entitlement area. The Five County Association of Governments coordinates with local housing authorities through frequent, varying forms of communication. The AOG and housing authority connections result in an understanding of the successes and challenges that housing authorities face—direct knowledge that the AOG can incorporate into community plans to address affordable housing constraints.

Housing Authorities work with several programs to assist in affordable housing needs, including:

- Public Housing, Section 8 Vouchers, House Choice Voucher Homeownership, CROWN (Credits-to-Own) Homes, subsidized and tax credit housing. A description of both the Cedar City and Beaver City Housing Authority activities are described in this section.

Cedar City Housing Authority

The Cedar City Housing Authority aids those earning less than 80% of the area median income (AMI) in securing affordable housing in Cedar City, Utah. They provide various options for affordable housing, including Section 8, Credit to Own (CROWN) Homes, Housing Choice Vouchers, and various other affordable housing units to clients.

The Housing Authority administers 272 Section 8 vouchers. It is estimated that 117 applicants are on the waitlist to receive Section 8 vouchers from the Housing Authority, and it is expected that there is a 1-year wait for those on the waitlist. Preference is given to non-elderly disabled persons at risk of being homeless, elderly persons, persons with disabilities, working families and families. One of the barriers described by the housing authority is that rental units in Iron County exceed the HUD Section 8 Fair Market Limit, resulting in a challenge in leasing with the vouchers. The housing authority credits a working relationship with local property managers to mitigate this challenge and house clients.

In addition to Section 8 Vouchers, the Cedar City Housing Authority owns several affordable units and connects renters to ownership options through Housing Choice Vouchers and CROWN units. There are 79 units for families without farm labor designation managed by the housing authority. The primary challenge the housing authority faces is the rapidly rising cost of housing. The Housing Authority offers opportunities for clients to transition into homeownership through the CROWN program, where a portion of the rents paid may be offered as a credit to purchase the home after a period of years. Section 8 voucher participants may participate in the voucher homeownership program. The housing authority also provides homeownership training to clients.

Public Housing Statistics, 2023					
Agency	**Public Housing Units**	**Public Housing Waiting List**	**Section 8 Vouchers**	**Section 8 Waiting List**	**Other affordable housing units**
Cedar City Housing Authority	0	0	272	117	110

Goal Outcome Indicator	Cedar City Housing Authority
Rental Units to be constructed	0
Rental Units to be rehabilitated	4
Homeowner Housing to be added	0
Homeowner housing to be rehabilitated	0

Beaver City Housing Authority

The Beaver City Housing Authority's assistance is targeted to families at or below 30% AMI. To date, the Housing Authority provides 18 public housing units, 12 Rural Development Farm Worker housing units, 42 single-family CROWN homes, 29 Section 8 vouchers, and 67 other housing authority owned units.

The Housing Authority indicates that the shortage of existing housing and high cost of construction is a barrier to affordable housing. More affordable housing and larger families are need of Section 8 vouchers and the current housing stock is old and dilapidated, illustrating an increased need for better housing targeted to low-and very low-income families. Beaver has expressed the need for Workforce Housing. Developers are not able to build suitable, needed housing in the small market of Beaver City.

Public Housing Statistics, 2023					
Agency	**Public Housing Units**	**PH Waiting List**	**Section 8 Vouchers**	**Section 8 Waiting List**	**Other affordable housing units**
Beaver City Housing Authority	18	8	19	10	62

Goal Outcome Indicator	Beaver Housing Authority
Rental Units to be constructed	29
Rental Units to be rehabilitated	3
Homeowner Housing to be added	5
Homeowner housing to be rehabilitated	0

The Beaver City Housing Authority encourages clients to participate in homeownership. The housing authority provides unsolicited money management counseling and work with tenants to learn to engage in yard work and minor home repairs. CROWN program tenants are encouraged to develop good credit scores and engage in good home management like home improvement skill building and housekeeping.

Barriers to Affordable Housing

With the new and changing legislation that seems to be happening in Utah in the past couple of years, the hope is a reduction of some of these barriers on the horizon. The AOG has taken on new programs that will hopefully help alleviate some of those barriers with the homebuyer assistance programs and the home rehabilitation programs. The AOG will also continue to review local general plans and land use ordinances for municipalities in this region to help identify some provisions for affordable housing in the community's respective ordinances. Despite progress made to remove barriers to affordable housing, each city can take measures to improve opportunities to develop affordable housing.

Moderate Income-Housing Plans

The Five County Association of Governments works with jurisdictions in our region to develop and update Moderate-Income Housing Plans to increase affordable housing opportunities for current and future residents. Moderate-Income Housing Plans include an analysis of the current supply of affordable housing in the community, the demand for affordable housing, need for rental or owned housing, etc. Moderate-Income Housing Plans are required to include an analysis of local housing barriers and achievable goals to address housing obstacles. Actions to remove or improve negative outcomes caused by barriers to affordable housing can be found in each jurisdiction's plan. Plans are housed at each respective jurisdiction, the Utah Department of Workforce Services Housing Division, and at the Five County Association of Governments.

Many Moderate-Income Housing Plans have been developed for communities throughout the region. A workforce housing plan is underway for Brian Head Town and will be completed by the end of this program year. The AOG annually prioritizes the communities in need of Moderate-Income Housing Plans, considering the age of the existing housing plan, changes in state requirements, and access to planning staff. Priorities for developing Moderate-Income Housing Plans and plan updates in the coming year include those communities on the LMI preapproved list. The goal at the Five County AOG is to ensure that each jurisdiction has a Moderate-Income Housing Plan in compliance with state requirements.

Moderate Income Housing plans assess the availability of the existing housing stock, average home prices, and zoning ordinances in effect which may be barriers to affordable housing in a jurisdiction. Some of the common findings from the Moderate-Income Housing Plans include:

- An adequate supply of housing is affordable to moderate-income households (<80% AMI) or greater, while demand generally outpaces the supply for low-income (<50% AMI) and very low-income households (<30% AMI).
- Manufactured and mobile homes help meet some of the need for low-income housing.

- Housing Authorities in the region are addressing some of the affordable housing needs for low-income households but are unable to meet the needs of everyone requiring assistance. Cities should continue to support Housing Authorities to address low-income housing needs.
- Smaller lot sizes, multi-family, and accessory dwelling units can help improve access to affordable housing in many communities in the region.
- Dense, centralized affordable housing has a lower impact than low-density, de-centralized development. Amending impact fees to better match the impact of the development would help increase housing affordability for low- to moderate-income households.

Common Barriers to Affordable Housing

There are 39 incorporated cities and towns, and five counties in the region that have varying codes, ordinances, policies, demographics, etc. Each community may experience differing housing barriers and challenges in providing affordable housing. An element of the Moderate-Income Housing Plan analyzes the existing zoning codes and land use policies in a community that can limit the development of Affordable Housing. The following are some barriers to affordable housing found in these analyses but is not a comprehensive list.

Affordable & Fair Housing Barrier and Strategies	
Barrier	**Strategy**
Development costs (impact fees) are passed onto the consumer	• Local governments can seek low-interest loans and/or grants to reduce development costs. • Continue to encourage jurisdictions to enact measures to reduce or waive such fees for projects that include affordable housing opportunities. • Enact graduated impact fees, which incentivize more central development with lower fees, thus more accurately pricing the development impact, and improving housing affordability.
Lack of ordinances which specifically mandate the provision of affordable housing	• Use inclusionary zoning to ensure that developments allocate a portion of the units to low- and moderate-income home buyers.
Costs of pre-development construction and on-site work is excessive	• Zone for higher densities to centralize services. • Encourage in-fill development and adaptive reuse. • Suggest implementation of mixed-use rehabilitation projects, i.e., retail ground level store fronts with low-income apartments on upper levels.
Historically the cost of property acquisition has affected housing affordability. Large minimum lot sizes tend	• Zone for higher densities and allow smaller building lots, multi-family housing, and accessory dwelling units. • Flexibility in zoning ordinances for open space requirements, parking provisions, etc. on low-income housing development. • Study pre-development cost reduction using community land trusts. • Partner with non-profits and/or Housing Authorities on low-income

Affordable & Fair Housing Barrier and Strategies	
Barrier	**Strategy**
to inhibit the viability of building affordable housing.	housing developments. • Encourage density bonuses for projects which provide affordable housing opportunities. • Use community land trusts, where the homeowner purchases the house, and the trust is the landowner, to reduce mortgage costs.
Not enough coordination between government programs and other funding sources	• Interagency collaboration to network information, resources, and services. • Partner on projects with other housing providers and lenders to reduce costs to low-income consumers. • Provide educational program(s) to inform local governments on their role in the scope of participation with other entities. • Joint rapid-rehousing project between Five County AOG, Canyon Creek Women's Crisis Center, and Dove Center. • Share data during LHCC meetings and strive to mutually assist other agencies in meeting the HUD performance standards which are being implemented for homeless providers. This will include greater collaboration and outreach to Head Start, Child Care, and Early Education providers.
Private sector developers may not be taking a sufficient role in the provision of affordable housing	• Work with local employers to establish employer assisted housing (EAH). Ultimately, EAH builds employee loyalty and reduces turnover by offering rental assistance.
Lack of rental assistance available	• Collaborate with local non-profits, clergy, and Housing Authorities to increase the availability of rental assistance programs, including Section 8 housing.
Lack of knowledge about housing options or personal best practices to purchase housing.	• Encourage low-income people to participate in First Time Home Buyers education courses. • Outreach to residents and tenants of public and manufactured housing assisted by public housing agencies to inform them of available down payment/closing cost assistance. • Follow fair housing laws to prevent discrimination against minority groups, the elderly, disabled, single parent households, and other protected classes.
Increasing utility costs	• Greater utilization of HEAT and Weatherization programs in housing stabilization plans for Section 8 vouchers, Rapid Re-housing, and Permanent Supportive Housing. • Increase CSBG funds available for one-time utility deposits. • Provide targeted smart-energy use education to housing clients (lowering thermostat by degrees, weatherizing housing, reporting energy usage problems early, etc.)

Affordable & Fair Housing Barrier and Strategies	
Barrier	**Strategy**
Low availability of rental units. This also includes units taken off the market for short-term vacation rentals	• Support non-profit developers such as NeighborWorks in increasing inventory. • Better outreach to developers regarding low-income tax credits. • Encouraging local municipalities to address zoning and enforcement issues related to vacation rentals.
Insufficient stock of housing	• Consider adaptive reuse programs to convert non-residential structures into multi-unit residential units. • Identify where jobs, multi-modal transit, and essential amenities (grocery, schools, etc) are in the community to select placement of affordable units. • Use methods like accessory dwelling units to increase housing stock.
Rising Costs and Interests Rates	• With the efforts to reduce inflation, rising interest rates have become an issue for homeowners qualifying for home loans. • Although cooling some, housing costs are still well above what they were pre-pandemic levels.

Other

The Five County Association of Governments is a regional planning organization which provides technical assistance to local governments. AOG Staff work with local governments to identify and help them implement strategies identified in the local jurisdictions' zoning, subdivision and other land use ordinances and codes; general plans; housing plans; and other relevant planning documents and policies.

Five County AOG staff and the Rating and Ranking Committee have worked hard to determine CDBG priorities and CDBG Rating and Ranking Criteria that incentivize affordable housing projects. AOG staff consistently look for opportunities to coordinate and collaborate with jurisdictions in the region, including meetings, workshops, and other forms of information sharing to improve the criteria and regional priorities. The local planners meeting hosted by the AOG staff has provided a venue for planners and local officials to discuss challenges and successes in community development locally. These meetings led to collaboration on shared challenges among these local leaders. AOG staff have identified areas for future consultation and strategies that can be applied throughout the region.

CDBG funds are used by the AOG to review and develop Moderate-Income Housing Plans with the incorporated Cities and Counties in the region as needed. AOG staff work closely with communities and service providers to maintain and encourage the development of affordable housing. Many communities housing plans indicate that there is limited housing stock available to meet the needs of

low- to moderate-income households. The AOG advocates for: the rehabilitation of deteriorated housing stock and rental units to bring them into standard condition; the availability of safe and adequate rentals; availability of a variety of housing types for rental and ownership; seasonal rental housing to support the tourism industry; and the development of additional water and sewer capacity for housing development in higher growth rate areas.

The AOG recommends leveraging available funding for infrastructure on a neighborhood scale, rather than assisting individual single-family properties to maximize the impact of available funds to multiple benefiting households. Association staff will continue to identify community barriers to housing affordability and cultivate strategies communities may use to address said barriers.

Five County staff work with the local housing authorities to improve coordination between public and private housing and social services in the region through regular meetings and discussion with providers. Five County AOG works to identify affordable housing gaps, and gaps in other services such as services for the homeless by working closely between the many departments housed at the AOG. Five County staff work closely with housing authorities, homeless shelters, local municipalities, and non-profits in the region to identify gaps and share knowledge. Staff at the Five County AOG will continue working with community organizations and entities to identify gaps in services and to create allocation policies that address identified needs.

In 2023, several community organizations contacted the AOG to discuss their organization and potential projects. AOG staff supported the accurate communication of CDBG policies to the organizations. Where potential projects did not align with CDBG policies, alternative options were discussed. Interested organizations were informed how to communicate concerns to the CDBG state staff to discuss concerns with state policies. Among the concerns discussed were the limits of purchasing land, rehabilitation of units, and other certain housing activities to housing authorities.

(Describe the reasons for allocation priorities. how the proposed distribution will address the needs and objectives described in the Consolidated Plan)

(Criteria for selecting applications and the relative importance of these criteria)

(How can potential applicants access application manuals or other materials describing the application criteria?)

(What is the process for awarding funds)

(Describe how resources will be allocated among funding categories)

Public Housing

(Actions planned to address the needs of public housing agencies)

(Actions to encourage public housing residents to become more involved in management and participate in homeownership-This section is especially for those who fund Public Housing Agencies)

Barriers to Affordable Housing

(Describe actions that will be taken in the next 12 months to reduce barriers to affordable housing. What will be done to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment)

Appendix D: FCAOG Fiscal Year 2023 Rating and Ranking Criteria

FIVE COUNTY ASSOCIATION OF GOVERNMENTS
COMMUNITY DEVELOPMENT BLOCK GRANT
GENERAL POLICIES

1. Weighted Value utilized for Rating and Ranking Criteria: The Rating and Ranking Criteria utilized by the Five County Association of Governments contains a weighted value for each of the criteria. Point values are assessed for each criterion and totaled. In the right-hand columns, the total points received are then multiplied by a weighted value to obtain the total score. These weighted values may change from year to year based on the region's determination of which criteria have higher priority.

2. Five County AOG staff require a visit with each applicant for an evaluation/review meeting.

3. All applications must be complete to be Rated and Ranked. All applications will be evaluated by the Five County Association of Governments Community and Economic Development staff using criteria approved by the Regional Review Committee (RRC) (Steering Committee).

4. Staff will present prioritization recommendations to the RRC for consideration and approval. Membership of the RRC includes two elected officials (mayor and commissioner) and a school board representative from each of the five counties. Appointments to the RRC are reviewed and presented annually in February for the two elected officials of each county as well as the county school boards.

5. The maximum amount per year for a project is $500,000. Multi-year projects will not be funded in the Five County Region.

6. Public hearing notices must be sent to the AOG CDBG staff immediately after posting. Any changes to the public hearing notices must be sent to the AOG Staff immediately after posting said change with notes describing the change.

7. Applications on behalf of sub-recipients (i.e., special service districts, non-profit organizations, etc.) are encouraged. However, the applicant town, city, or county must understand that even if they name the sub-recipient as project manager the town, city, or county is still responsible for the project's viability and program compliance. The applying entity must be willing to maintain an active oversight of both the project and the sub-recipient's contract performance. An interlocal agreement between the applicant entity and the sub-recipient must accompany the CDBG application. The inter-local agreement must detail who will be the project manager and how the sponsoring entity and sub-recipient will coordinate work on the project.

8. Applicant Deadlines to the AOG
   - **Applicants must Consult with AOG CDBG Staff by November 1, 2023** – The project manager from the applicant jurisdiction must meet with AOG CDBG staff to be eligible for funds.

- **Income Surveys must be conducted and received by the AOG for tabulation no later than January 2, 2024, at 5:00 PM.** Surveys must be conducted using a state approved methodology and submitted by the deadline for AOG tabulation.
- **Capital Improvements Lists (CIL)- due January 2, 2024, at 5:00 p.m.** The project applied for must be included on the prioritized capital improvements list (CIL) that the entity submits for inclusion in the Consolidated Plan. If the CIL list containing the project is not submitted by the deadline, the project application will not be rated and ranked. Applicants may not amend Capital Improvements List after the deadline.
- **Complete Applications must be submitted in WebGrants3 by December 22, 2023, at 5:00 PM** for Five County CED staff to provide administrative support and draft the Annual Action Plan. Applicants that do not meet this requirement will not be eligible for CDBG funding.

9. Pre-approved funding:

• $100,000 to Five County AOG (Administration, Consolidated Plan Planning, Rating & Ranking, Planning Assistance, Affordable Housing Planning, and Economic Development TA).

10. Set-aside Funding:

• Iron County Fire Truck for an emergency project. - $350,000

11. Emergency projects may be considered by the Regional Review Committee (FCAOG Steering Committee) at any time. Projects applying for emergency funding must still meet national objectives and regional goals and policies.
Projects may be considered as an emergency application if:

• Funding through the normal application time frame will create an unreasonable risk to health or property.

• An appropriate third-party agency has documented a specific risk (or risks) that; in their opinion; needs immediate remediation.

If an applicant wishes to consider applying for emergency funds, they should contact the Five County Association of Governments CDBG Program Specialist as soon as possible to discuss the state required application procedure as well as regional criteria. Emergency funds (distributed statewide) are limited on an annual basis to $500,000. The amount of any emergency funds distributed during the year will be subtracted from the top of the appropriate regional allocation during the next funding cycle.

12. Public service providers may apply for CDBG funds for capital improvement and major equipment purchases. Examples are delivery trucks, furnishings, fixtures, computer equipment, construction, remodeling, and facility expansion. State policy guidelines prohibit the use of CDBG funds for operating and maintenance expenses, including paying administrative costs, salaries, etc. No more than 15 percent of the state's yearly allocation of funds may be expended for public service activities.
13. State policy has established the minimum project size at $30,000. Projects less than the minimum size will not be considered for rating and ranking.

14. In accordance with state policy, grantees with open grants from previous years who have not spent 50 percent of their previous grant prior to rating and ranking are not eligible to be rated and ranked.
15. It is the policy of the Five County Association of Governments RRC that CDBG funding of housing related projects shall be directed to:
    - The development of infrastructure supporting affordable housing, and/or eligible limited clientele housing.
    - Rehabilitation of multifamily rental housing managed by a public housing authority.
    - Acquisition of real property for affordable housing that will be managed by a public housing authority.

    CDBG funds in this region shall not be utilized for LMI rental assistance or direct housing assistance payments.

16. It is the policy of the RRC that lots for single family homes may not be procured with CDBG funding in the Five County region unless the homes remain available as rental units under the auspices of a public housing authority.

17. In the event of a tie for the last funding position during rating and ranking of projects, the following will be awarded one (1) point for each criterion answered affirmatively:
    - The project that has the highest percentage of LMI.
    - The project that has the most local funds leveraged.
    - The project with the most other funds leveraged.
    - The largest geographical area benefited.
    - The project with the largest number of LMI beneficiaries.

    If a tie remains unbroken after the above-mentioned tie breaker, the members of the RRC will vote and the project that receives the majority vote will be ranked higher.

18. After all projects have been fully funded in the order of their Rating and Ranking prioritization and a balance remains insufficient for the next project in priority to complete a project in the current year, the funds will be applied as follows, in this order, until funds are spent:
    - The balance will be divided proportionately to the cost of each funded construction project, and those grantees will be directed to place that amount in their budget as “construction contingency”.
    - Prorated to all applications with City, Town, or County match as a match substitute. Grantees will be directed to place that amount in their budget as “match substitute”.

    After completion of those projects, if the dollars are not needed as contingency, they are to be released back to the state to be reallocated in the statewide pool.

19. Funding for CDBG projects in the Five County Region is contingent on receiving the allocation from HUD and the State. If available funds are less than anticipated, the award amount will be reduced from the project in the last funding position.

20. Grantees who are awarded CDBG funding and choose to not undertake the project in a timeframe that will allow for redistribution of funds in the Five County region, during the same program year, will be prohibited from re-applying for the same project. Grantees who choose not to follow through on their project within the allocated timeframe will not be permitted to apply for CDBG in the following program year. A request for an exception to this policy may be considered by the RRC if a project circumstantially could not be completed (E.g., environmental conditions do not permit). Cost overruns and overbidding are unacceptable circumstances for not undertaking the project and will not be considered by the RRC, as grantees should plan for such events.

FIVE COUNTY ASSOCIATION OF GOVERNMENTS
CDBG HOW-TO-APPLY APPLICATION WORKSHOP
ATTENDANCE POLICY

Attendance at one workshop within the region is mandatory by all prospective applicants or an official representative of said applicant. [State Policy]

Attendance at the workshop by an elected official or town, city, or county staff person satisfies this attendance requirement.

Attendance by prospective eligible "sub-grantees", which may include non-profit agencies, special service districts, housing authorities, etc. is strongly recommended so that they may become familiar with the application procedures. If a town, city, or county applicant elects to sponsor a sub-grantee it is the responsibility of that jurisdiction to ensure the timely and accurate preparation of the CDBG application on behalf of the sub-grantee.

Jurisdictions may formally designate a third-party representative (i.e., consultant, engineer, or architect) to attend the workshop on their behalf. Said designation by the jurisdiction shall be in writing and delivered to the AOG no later than 7-days following the workshop.

FIVE COUNTY ASSOCIATION OF GOVERNMENTS
CDBG RATING AND RANKING PROGRAM YEAR 2023
DATA SOURCES

1. CAPACITY TO CARRY OUT THE GRANT: The grantee must have a history of successful grant administration to receive full points in this category. First time grantees or grantees who have not applied in more than 5 years are presumed to have the capacity to successfully carry out a project and will receive a default score of 2.5 points. To adequately evaluate grantee performance, the RRC must consult with the state staff. State staff will rate performance on a scale of 1-5 (Five being best). A grantee whose performance in the past was poor must show improved administration capability through third party administration contracts with AOG's or other capable entities to get partial credit.

2. GRANT ADMINISTRATION: Those making a concerted effort to minimize grant administration costs taken from CDBG funds will be awarded extra points, with applicants using zero CDBG funds toward administration receiving 3 points.

3. UNEMPLOYMENT: Points are awarded to projects serving jurisdictions in counties that are above the state average unemployment, using data "Utah Economic and Demographic Profiles" (most current issue available prior to rating and ranking), provided by Utah Office of Planning and Budget or The Kem Gardner Policy Institute; or "Utah Labor Market Report" (most current issue with annual averages), provided by Department of Workforce Services.

4. FINANCIAL COMMITMENT TO COMMUNITY DEVELOPMENT (Self-Help Financing): Documentation by the applicant in the grant application of the source(s) and status (whether already secured or not) of all proposed "matching" funds must be provided prior to the rating and ranking of the application by the RRC. Any changes made in the dollar amount of proposed funding, after rating and ranking has taken place, shall require reevaluation of the rating received on this criterion. A determination will then be made as to whether the project's overall ranking and funding prioritization is affected by the score change.

Use of an applicant's local funds and/or leveraging of other matching funds is strongly encouraged in CDBG funded projects. This allows for a greater number of projects to be accomplished each year. Acceptable matches include property, materials available and specifically committed to this project, and cash. Due to federal restrictions unacceptable matches include donated labor, use of equipment, etc. All matches proposed must be quantified as cash equivalent through an acceptable process before the match can be used. Documentation on how and by whom the match is quantified is required. "Secured" funding means that a letter or application of intent exist to show that other funding sources have been requested as a match to the proposed project. Documentation of matching funds must be included in the application. If leveraged funds are not received, then the points given for that match will be deducted and the project's rating reevaluated.

A jurisdiction's population (most current estimate provided by the Census, ACS, or Kem C. Gardner Policy Institute.) will determine whether they are Category A, B, C, or D for the purposes of this criteria. A jurisdiction is defined as an incorporated town, city, county, or a

defined special service district area. All public housing authorities or similar non-profits shall be considered a 4B jurisdiction for this criterion.

5. CDBG FUNDS REQUESTED PER CAPITA: Determined by dividing the dollar amount requested in the CDBG application by the beneficiary population.

6. LOCAL JURISDICTIONS COMMUNITY DEVELOPMENT OBJECTIVES: THRESHOLD CRITERIA: Every applicant is required to document that the project for which they are applying is consistent with that community's and the Five County District Consolidated Plan. The project, or project type, must be a high priority in the investment component (CASI or equivalent). The applicant must include evidence that the community was and continues to be a willing partner in the development of the regional (five-county) consolidated planning process. Refer to the Utah CDBG Application Policies and Procedures Handbook section about Consistency with the Consolidated Plan for further information.

7. COUNTY'S COMMUNITY DEVELOPMENT GOALS AND POLICIES: Prioritization will be determined by the three (3) appointed RRC members representing the county in which the proposed project is located. The three (3) members of the Steering Committee include: one County Commission Representative, one Mayor's Representative, and one School Board Representative. (Note: for AOG applications that are not set aides, determination is made by the Steering Committee Chair, in consultation with the AOG Executive Committee.)

8. REGIONAL COMMUNITY DEVELOPMENT GOALS AND POLICIES: Determined by the Executive Director with consultation of the AOG Finance Committee members. The Finance Committee is comprised of one County Commissioner from each of the five counties.

#1 priority 6 points X 2.0 (weighting) = 12.0 points
#2 priority 5 points X 2.0 (weighting) = 10.0 points
#3 priority 4 points X 2.0 (weighting) = 8.0 points
#4 priority 3 points X 2.0 (weighting) = 6.0 points
#5 priority 2 points X 2.0 (weighting) = 4.0 points
#6 priority 1 points X 2.0 (weighting) = 2.0 points

Regional Prioritization Justification

#1 **Public Infrastructure** Projects designed to increase the public infrastructure systems. Examples include but are not limited to transportation, utilities, storm water projects, etc.

#2 **Public Safety Activities** Projects related to the protection of property include activities such as flood control projects or fire protection improvements.

#3 **LMI Housing Activities** Projects designed to provide for the housing needs of low- and moderate-income persons.

#4 **Community Facilities** Examples include but are not limited to senior citizens centers, health clinics, food banks, and/or public service activities. Includes parks and recreation facilities.

#5 **Parks and Recreation** Construction and equipment for parks and recreation services.

#6 **Projects to remove Architectural Barriers** Projects that address accessibility of public facilities for the provision of services to people with disabilities on an equal basis. See the Americans with Disabilities Act Checklist for

Readily Achievable Barrier Removal for Existing Facilities to assess facilities and see examples of potential solutions.

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Note: The Executive Director, in consultation with the Finance Committee members, reviewed and obtained approval of this regional prioritization for the CDBG program FY2024.

9. IMPROVEMENTS TO, OR EXPANSION OF, LMI HOUSING STOCK, OR PROVIDING AFFORDABLE HOUSING ACCESSIBILITY TO LMI RESIDENTS: Information provided by the applicant. Applicant must adequately explain reasoning which supports proposed figures, for the number of LMI housing units to be constructed, substantially rehabilitated with the assistance off this grant, or the number of units this grant will make accessible to LMI residents through loan closing or down payment assistance.

10. AFFORDABLE HOUSING PLAN IMPLEMENTATION: The CDBG State Policy Committee has established that communities and counties that are not in compliance with current state low- and moderate-income housing requirements are not eligible to apply for CDBG funding. Applicants must provide documentation that they are in compliance in their CDBG application. Communities may find information about Moderate Income Housing planning and reporting requirements at https://jobs.utah.gov/housing/affordable/moderate/index.html. Projects which demonstrate implementation of a jurisdiction's Affordable Housing Plan policies will be given full points. Towns applying for credit under this criterion must show that the project either meets a goal in its adopted annual housing report/affordable housing element of their General Plan, or a regional affordable housing goal in the Consolidated Plan. Applicants must provide sufficient documentation to justify that their project complies with this criterion.

11. GEOGRAPHIC EXTENT OF PROJECT'S IMPACT: Describes the actual area to be benefitted by the project applied for. Housing projects are considered a site-specific project.

12. PROPERTY TAX RATE FOR JURISDICTION: Base tax rate for community or county, as applicable, will be taken from the "Statistical Review of Government in Utah", or most current source available prior to rating and ranking. Basis for determining percent are the maximum tax rates allowed in the Utah Code: 0.70% for municipalities, and 0.32% for counties.
Full points will be awarded to jurisdictions that tax at greater than 50%.
A default of 3 points will be awarded for non-taxing jurisdictions.

13. PERCENTAGE OF PROJECT AREA WHO ARE LOW TO MODERATE INCOME: The figures will be provided from the results of a Housing and Community Development Division (HCDD) approved income survey conducted by the applicant of the project benefit area households, or pre-approved LMI communities list in the Policies and Procedures book, HUD CHAS data, or the HUD LMI Map Application Tool.

14. EXTENT OF POVERTY: The percentage of the total population of the project area who are Low Income (<50% of AMI) or Very-Low Income (<30% AMI) directly benefitting from the project. The AOG staff will use the income surveys (for those who conducted a survey), or pre-approved LMI communities list in the Policies and Procedures book, HUD CHAS data, or the HUD LMI Map Application Tool.

15. LIMITED CLIENTELE GROUP: Applicant will provide information as to what percent of the proposed project will assist a presumed LMI group as defined in the current program year CDBG Application Guide

handbook. Applicants serving limited clientele group(s) must include intake forms or other documentation to show that their program or organization serves LMI persons.

16. CIVIL RIGHTS COMPLIANCE: Applicants will receive points for compliance with federal laws, executive orders and regulations related to civil rights. (Checklist and templates available from State CDBG staff.) An applicant can be awarded a maximum of two points for this criterion if the checklist is completed AND the Civil Rights policies have been adopted for the jurisdiction.

1 Point – Complete "ADA Checklist for Readily Achievable Barrier Removal" for applicant town, city, or county office.

1 Point – Applicant town, city, or county has adopted the following policies – Grievance Procedure under the Americans with Disabilities Act, Section 504 and ADA Effective Communication Policy, Language Access Plan and Section 504 and ADA Reasonable Accommodation Policy.

17. PRO-ACTIVE PLANNING: The State of Utah emphasizes the importance of incorporating planning into the operation of government. Communities that demonstrate their desire to improve through planning will receive additional points in the rating and ranking process.

In the rating and ranking of CDBG applications, the region will recognize an applicant's accomplishments consistent with these principles by adding additional points when evaluating the following:

**** Demonstration of proactive land use planning in the community.**

**** Demonstration that project is in accordance with an applicable adopted Plan in the benefiting community.**

**** Development of efficient infrastructure including water and energy conservation.**

**** Protection and conservation plan for water, air, critical lands, important agricultural lands, and historic resources**.

****Removal of barriers to accessibility of programs and facilities for all persons.**

The applicant is responsible for attaching supplemental documents and describing the criteria met in the application. Worksheet #17 will be used in the rating and ranking process for applicants who provide documentation showing the community's proactive planning efforts.

18. APPLICATION QUALITY: Quality of the Pre-Application is evaluated in terms of project problem identification, justification, well-defined scope of work likely to address identified problems, identification of a realistic project timeline, and a detailed architectural/engineering report.

19. PROJECT MATURITY: Funding should be prioritized to those projects which are the most "mature". Five County AOG considers mature projects to be those where the applicant: 1) has selected an engineer and/or architect and demonstrate appropriate procurement; 2) has identified a problem, proposed solution, and timeline to proceed immediately; and 3) identifies all funding sources committed or pending.

Projects that are insufficiently mature may not be rated and ranked.