



## **FY24 Pathways to Removing Obstacles to Housing (PRO Housing) FR-6800-N-98 (Cover Page WILL BE DELETED)**

Prepared for:

US Department of Housing and Urban Development

Community Planning and Development

[CDBG-PROHousing@hud.gov](mailto:CDBG-PROHousing@hud.gov)

Prepared by:



Salt Lake County

## Table of Contents

Table of Contents .....	2
Exhibit A Executive Summary.....	3
Exhibit B Threshold Requirements and Other Submission Requirements .....	4
Exhibit C Need (35pts) .....	6
i. Demonstration of Progress (15pts) .....	6
a. Improved Laws, Regulations, or Land Use Local Policies (10pts).....	7
b. Recent Actions (5pts).....	9
ii. Acute Needs (10pts).....	9
iii. Key Barriers (10pts) .....	11
Exhibit D Soundness of Approach (35pts).....	6
i. Vision (15pts).....	16
ii. Geographic Scope (5pts).....	23
iii. Stakeholders (5pts) .....	24
iv. Alignment with Requirements (5pts) .....	24
v. Budget and Timeline (5pts).....	29
Exhibit E Capacity (10pts).....	31
Exhibit F Leverage (10pts) .....	<b>Error! Bookmark not defined.</b>
Exhibit G Long-term Effect (10pts).....	36
Attachments .....	<b>Error! Bookmark not defined.</b>
Attachment A – Summary of Comments .....	<b>Error! Bookmark not defined.</b>
Attachment B – Certification of Compliance .....	<b>Error! Bookmark not defined.</b>
Attachment C – Advancing Racial Equity.....	<b>Error! Bookmark not defined.</b>
Attachment D Affirmative Marketing and Outreach .....	<b>Error! Bookmark not defined.</b>
Attachment E Experience Promoting Racial Equity.....	<b>Error! Bookmark not defined.</b>

## Exhibit A Executive Summary

Salt Lake County (SLCo) is submitting a proposal under the HUD PRO-Housing program to implement two key activities aimed at reducing barriers to affordable and safe housing.

**Use 1: Community Land Trust Investment Fund (CLT IF) - \$6,050,000**

**Use 2: Establish Community Land Trust/Community Land Bank - \$124,000**

These activities will strategically address both the preservation of affordable housing and the development of new units through a Community Land Trust (CLT) and Community Land Bank (CLB) initiative. The total funding request is \$7 million, with \$6.5 million allocated for a revolving loan fund and \$500,000 for the establishment of the CLT/CLB.

Salt Lake County is committed to addressing the pressing affordable housing crisis that affects vulnerable communities across the region. To this end, the County is proposing the establishment of a Community Land Trust (CLT) and a Community Land Bank (CLB) alongside a revolving loan fund known as the Community Land Trust Investment Fund (CLT IF). This innovative approach aims to leverage publicly owned land to create and preserve affordable housing, ensuring long-term affordability and preventing displacement in neighborhoods historically inhabited by low-income residents and communities of color.

The proposed initiative aligns with existing local efforts to streamline the development of affordable housing by utilizing county-owned properties, thus reducing the challenges of locating suitable land and securing capital. The CLT model will allow Salt Lake County to maintain ownership of the land while enabling affordable housing developments to flourish, thereby preventing gentrification and promoting neighborhood resiliency.

Through extensive outreach and collaboration with key stakeholders—including homeless service providers, housing developers, and public housing authorities—Salt Lake County has identified the critical need for affordable housing in high-opportunity areas. The engagement of these stakeholders has informed the project design and ensures that the needs of low-income residents are at the forefront of this initiative.

By creating a robust funding structure and fostering partnerships with both public and private entities, the CLT IF will facilitate the rapid development of affordable housing units in strategic locations throughout Salt Lake County. This proposal not only addresses the immediate housing deficit but also promotes long-term community stability and access to essential services.

In summary, Salt Lake County's initiative to establish a Community Land Trust and a revolving loan fund represents a proactive, inclusive, and sustainable approach to tackling the affordable housing crisis, with the goal of ensuring that all residents, particularly those from historically underserved communities, have access to safe and affordable housing.

## **Exhibit B Threshold Requirements and Other Submission Requirements**

### **Resolution of Civil Rights Matters**

Currently, Salt Lake County (SLCo) has no pending civil rights matters concerning the following issues: systemic violations of the Fair Housing Act or equivalent state and local fair housing laws; involvement in lawsuits by HUD, the United States, or the Department of Justice alleging patterns of discrimination or violations of civil rights laws such as Title VI of the Civil Rights Act, the Rehabilitation Act, the Housing and Community Development Act, the Americans with Disabilities Act, the Violence Against Women Act, or the False Claims Act; or receipt of findings or determinations identifying systemic non-compliance with these laws. This reflects the County's ongoing commitment to fostering a community that values and upholds the principles of fairness, equality, and inclusivity for all residents.

### **Eligible Applicant**

SLCo is an eligible applicant as a county government in the State of Utah.

SLCo code of conduct complies with, and will continue to comply with, requirements relating to procurements and conflicts of interest outlined in 2 CFR 200.318(c) and 2 CFR 200.317, as well as HUD-specific conflict of interest standards.

### **Number of Applications**

Salt Lake County is submitting one application for in pursuit of HUD's PRO-Housing grant funds.

### **Limited English Proficiency (LEP)**

SLCo is committed to taking reasonable steps to provide meaningful language access to persons with Limited English Proficiency (LEP) in connection with any program, activity, or service funded under this NOFO, in accordance with Title VI of the Civil Rights Act of 1964. To ensure that information regarding the planning process and this application is accessible to LEP populations, we will consult the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI, Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, published in the Federal Register on January 22, 2007 (72 FR 2732). By following this guidance, SLCo will ensure that LEP individuals receive adequate and appropriate access to information and services, and thereby promote inclusivity and compliance with federal regulations.

### **Physical Accessibility**

SLCo will ensure that all public meetings will be held in facilities that are physically accessible to persons with disabilities. If physical accessibility is not achievable, the County will prioritize alternative methods of delivering products or information that are accessible and usable by individuals with disabilities. The County will offer programs and activities to qualified

individuals with disabilities in the most integrated setting appropriate, in compliance with Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) and HUD's implementing regulations at 24 CFR part 8, as well as Title II of the Americans with Disabilities Act (42 U.S.C. §§ 12131-12134) and its implementing regulations at 28 CFR part 35, along with all other applicable laws and regulations.

Additionally, all notices of and communications during training sessions and public meetings will be provided in an effective manner for persons with hearing, visual, and other communication-related disabilities. Reasonable accommodations will be provided to ensure equal and full participation by persons with disabilities, consistent with Section 504 of the Rehabilitation Act of 1973 and HUD's Section 504 regulations (24 CFR Section 8.6 and Section 8), and Title II of the Americans with Disabilities Act (28 CFR part 35, subpart E, and 28 CFR § 35.130(b)(7)).

The County will ensure compliance with the Uniform Federal Accessibility Standards and the 2010 ADA Standards for Accessible Design, with exceptions as detailed in HUD's Deeming Notice (79 Fed. Reg. 29,671, May 23, 2014), for covered multifamily housing projects involving substantial alterations or new construction. Under the Fair Housing Act, all new construction of covered multifamily dwellings and rehabilitations that result in a covered multifamily dwelling will contain features of accessible and adaptable design in accordance with the design and construction requirements at 42 U.S.C. § 3604(f)(3)(C). This requirement is in addition to any other accessibility requirements mandated by federal, state, or local law.

## Environmental Review

SLCo affirms its commitment to comply with all environmental requirements specified in 24 CFR part 50 or 58. Activities under this NOFO will be subject to an environmental review conducted by a responsible entity, as defined by 24 CFR 58.2(a)(7), under HUD regulations at 24 CFR part 58, or by HUD under 24 CFR part 50. This review will assess the impact of proposed projects on both people and the natural environment within the designated project area, in compliance with the National Environmental Policy Act of 1969 (NEPA), 42 U.S.C. 4321, and relevant environmental justice requirements as set forth in Executive Orders 12898, 14008, and 14096, along with all other applicable federal environmental authorities. The County will provide all available and relevant information necessary for the environmental review of each activity, including property-specific details when applicable. SLCo will implement any mitigating measures required or select an alternative project site if necessary.

The County understands that it is prohibited from acquiring, rehabilitating, converting, leasing, repairing, disposing of, demolishing, or constructing property for a project under this NOFO, or committing or expending HUD or non-HUD funds for such activities, until completion of the environmental review procedures required by 24 CFR part 58, including obtaining environmental certification and approval of the Request for Release of Funds and Certification (RROF) where applicable.

Given that site contamination is a common concern for manufactured housing units and communities, it is critical to address potential contamination issues. Manufactured housing

communities (MHCs) may be located on or near properties with site contamination, which could impact the health and safety of residents. The County will use the EPA's NEPAssist tool (<https://www.epa.gov/nepa/nepassist>) for conducting contamination analysis as required by 24 CFR 58.5(i) as part of the environmental review.

## **Exhibit C Need (35pts)**

### ***i. Demonstration of Progress (15pts)***

#### **Salt Lake County's Commitment to Affordable Housing**

Salt Lake County is facing significant challenges related to affordable housing access due to rapid population growth, rising housing costs, and the limited availability of affordable units. To address these issues, the County has demonstrated both a strong commitment and tangible progress in overcoming local barriers that hinder affordable housing production and preservation. One of the most important steps has been the creation of the Housing Trust Fund (HTF), which serves as a critical tool in the County's ongoing efforts to increase the availability of affordable housing.

#### **Progress in Overcoming Local Barriers**

##### **1. Creation of the Housing Trust Fund (HTF)**

In 2022, Salt Lake County established the Housing Trust Fund (HTF) and an advisory board to streamline and review applications for affordable housing development. This board is central to identifying projects that meet the County's housing needs, ensuring that local laws and regulations align with efforts to facilitate the development of affordable units.

##### **2. Tailored RFAs and RFPs**

The HTF has developed flexible Requests for Applications (RFAs) and Requests for Proposals (RFPs) to match the specific needs of affordable housing developers. For example, Salt Lake County utilized State and Local Fiscal Recovery Funds to issue an affordable housing RFA specifically targeting "shovel-ready" projects with larger unit sizes. This tailoring of funding opportunities allows the County to support developers who are ready to build, ensuring the timely delivery of housing units.

##### **3. Efficient Use of Funds**

The Housing Trust Fund has been highly efficient in the use of its allocated resources. Initially, the program received \$20 million, but due to careful planning and execution, an additional \$5.8 million was secured to fund all 17 projects submitted. This efficient use of funds, coupled with the program's ability to generate support from the County Council, underscores the County's commitment to housing development.

#### **4. Building Local Partnerships**

The HTF staff has actively worked to build relationships with local officials, further cementing Salt Lake County's role as a leader in affordable housing development. These partnerships are key to achieving the moderate-income housing goals set by municipalities across the County. By fostering collaboration with local governments, Salt Lake County ensures that affordable housing remains a top priority for the region.

Salt Lake County's proactive approach in establishing the Housing Trust Fund, creating tailored funding opportunities, efficiently using resources, and building strategic partnerships showcases a clear commitment to overcoming local barriers to affordable housing. These actions demonstrate the County's ongoing efforts to streamline the development and preservation of affordable housing, ensuring that moderate-income families can find stable, affordable housing within the community.

##### **a. Improved Laws, Regulations, or Land Use Local Policies (10pts)**

Salt Lake County, while lacking direct land use authority, has been instrumental in overcoming local barriers to affordable housing production and preservation through strategic partnerships with cities and active support of state-level legislative reforms. These efforts have focused on increasing housing supply, improving access to capital, and streamlining development processes. One prominent example of these partnerships is the collaboration between Salt Lake County's Housing Trust Fund (HTF) and Bluffdale City.

##### **Supporting Bluffdale's Accessory Dwelling Unit (ADU) Program**

Salt Lake County partnered with Bluffdale City to advance its Affordable Dwelling Unit (ADU) program. As part of Bluffdale's broader strategy to address housing affordability, this partnership has facilitated zoning updates and provided residents with more flexible housing options. Bluffdale's Moderate-Income Housing Plan (MIHP), updated in September 2022, included two significant strategies for improving housing access:

###### **1. Allowing for Accessory Dwelling Units (ADUs)**

Salt Lake County supported Bluffdale in developing a toolkit to streamline the process of building ADUs. This toolkit simplifies zoning regulations and provides a clear pathway for residents to add ADUs to their properties, thus increasing the supply of affordable housing. The zoning changes have reduced barriers to creating ADUs, a vital step in meeting the state's moderate-income housing goals.

###### **2. Promoting Higher Density Housing in Key Zones**

Bluffdale also adopted changes that allow for higher-density, moderate-income residential development in commercial and mixed-use zones. By encouraging density in these areas,

Bluffdale is able to target affordable housing production in proximity to jobs and services, providing more accessible living options for moderate-income families.

### **Legislative Support for Moderate-Income Housing Plans**

During the 2022 Utah Legislative session, Salt Lake County supported state legislation requiring cities to adopt and enforce Moderate-Income Housing Plans (MIHPs). This legislation, codified in Utah Code sections 10-9a-103(40) and 17-27a-103(43), mandates that most cities plan for housing for households earning 80% or less of the area median income. This requirement ensures that local jurisdictions address housing needs comprehensively, targeting housing affordability for a substantial portion of their populations. Salt Lake County's support for this legislation aligns with its broader goals of creating affordable housing options and reducing the cost burden on residents.

### **Community Land Trust (CLT) Policies and Procedures**

In addition to these partnerships, Salt Lake County is also working to implement a Community Land Trust (CLT) to further address affordable housing needs. The County's Housing and Community Development (HCD) team is developing policies and procedures to align the CLT with existing housing policies. These policies will guide the use of land and funding to preserve long-term affordability and ensure alignment with countywide housing goals.

Although Salt Lake County does not possess direct land use authority, it has played a critical role in overcoming local barriers to affordable housing through collaboration with cities like Bluffdale, support for statewide legislation, and the development of long-term housing strategies like the Community Land Trust. These initiatives demonstrate Salt Lake County's continued commitment to increasing the supply and preservation of affordable housing through targeted regulatory and legislative support..

### **Timeframe for These Efforts and the Measurable Impact Thus Far**

The moderate-income housing plan requirement has been fully enacted and every city that is required to submit a plan has done so. Salt Lake County working with cities to achieve the goals outlined in the plan. An example of a goal a city has would be to create 100 units of affordable housing on city owned land.

### **Barriers Addressed by These Efforts**

The requirements of the Moderate Income Housing Plan law has led to cities now engaging with Salt Lake County to meet the requirements of the plan. While no funding was allocated with the rule, making cities responsible for their own affordable housing deficit has created engagement with existing funding processes from cities that have never participated before.

## b. Recent Actions (5pts)

Salt Lake County has taken significant steps to overcome barriers and facilitate the increase of affordable housing production and preservation. One key initiative is the establishment of a Community Land Trust (CLT)/Community Land Bank (CLB), with the Housing and Community Development (HCD) team dedicating specific staff to lay the groundwork. The CLT/CLB aims to protect publicly owned land, leverage both public and private partnerships, and utilize funding to bolster affordable housing development. It also serves as a platform for promoting zoning and housing policy reforms to further support affordable housing efforts.

In addition, over the past year, the HCD has been redrafting all departmental policies to better align with the county's evolving housing needs. This includes updating the County's 5-year Consolidated Plan to promote updated housing policies and goals. While Salt Lake County does not have direct local land use authority, it plays an essential role in supporting housing development through funding, expertise, and housing policy recommendations that municipalities can adopt.

Furthermore, Salt Lake County has authored a comprehensive housing policy that outlines the County's role in creating and preserving affordable housing. This policy provides a strategic guide for cities within the County to adopt and implement long-term, sustainable housing strategies, ensuring a collaborative regional approach to addressing affordable housing needs. These recent actions reflect Salt Lake County's commitment to increasing access to affordable housing through innovative partnerships, strategic planning, and policy reform.

### ii. Acute Needs (10pts)

Salt Lake County faces a massive and acute need for affordable housing, particularly for households earning at or below 50% of the Area Median Income (AMI). This need is well-documented through a comprehensive study conducted by the University of Utah, which mapped the availability of affordable housing against the number of low- and extremely low-income households in the county. The study resulted in an interactive dashboard that tracks housing needs across the state and highlights the significant shortfall in affordable units. This dashboard<sup>1</sup> provides ongoing data to measure and understand the housing gap within Salt Lake County and the state as a whole.

Additionally, the Bureau of Economic Analysis ranks Utah 35th in housing affordability, a concerning statistic in light of the fact that over 80% of Utah residents cannot afford to purchase a home. The affordability crisis is particularly pronounced among renters and first-time homebuyers. As noted in a local publication **The Housing market Crisis: An Accurate Description**<sup>2</sup>; “Utah is in a housing market crisis.” Former Utah legislator Steve Waldrip

<sup>1</sup> (<https://gardner.utah.edu/affordable-housing-dashboard/>)

<sup>2</sup> KSL News Radio 102.7fm (2023, August 23). *The Housing Market Crisis: An Accurate Description*. KSLNewsradio.com. <https://kslnewsradio.com/2033054/the-housing-market-crisis-an-accurate-description/>

emphasized the severity of the situation, stating that 90% of renters in Utah are unable to afford homeownership at present. “Over the last 10 years, interest rates have gone up, and affordability has gone down. It’s just an absolute crisis for anybody who is coming of age,” Waldrip explained. “The American dream is simply out of reach for the vast, vast majority of the citizens in our state.”

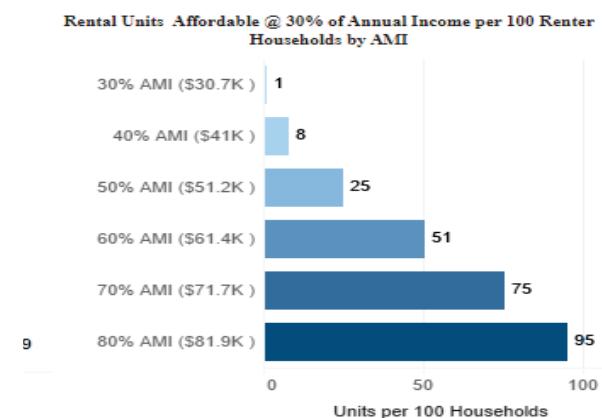
Waldrip further illustrated the scope of the issue by highlighting the disparity between the national and local housing markets. While the average monthly mortgage in the U.S. is around \$2,600, on the Wasatch Front—where the median home price is \$500,000—monthly mortgage payments often exceed \$4,000. This is based on the assumption that buyers can even afford the 20% down payment, which amounts to \$100,000. As Waldrip aptly put it, “It’s absolutely upside down for most people,” making homeownership unattainable for a significant portion of Salt Lake County residents.

The combination of these factors—escalating home prices, rising interest rates, and stagnating wages—has created a housing affordability crisis. Salt Lake County continues to track these metrics and work toward solutions, but the need for affordable housing remains urgent and unmet for many residents.

### **The Utah rental market is also constraining many renters in the market**

According to HUD’s *COMPREHENSIVE HOUSING MARKET ANALYSIS Salt Lake City, Utah*, is expected to increase during the forecast period<sup>3</sup>

The figure below illustrates affordable rental units available at 30% of Annual Income per 100 renters.<sup>4</sup>



<sup>3</sup> U.S. Department of Housing and Urban Development, Office of Policy Development and Research (2022, December 1). *COMPREHENSIVE HOUSING MARKET ANALYSIS Salt Lake City, Utah*. [Www.Huduser.gov](https://www.huduser.gov/portal/publications/pdf/SaltLakeCityUT-CHMA-22.pdf). <https://www.huduser.gov/portal/publications/pdf/SaltLakeCityUT-CHMA-22.pdf>

<sup>4</sup> The Kem C. Gardner Policy Institute at the University of Utah (n.d.). *The Utah Housing Affordability Dashboard*. Gardner.Utah.edu. <https://gardner.utah.edu/affordable-housing-dashboard/#:~:text=The%20Utah%20Housing%20Affordability%20Dashboard%20The>

## **Salt Lake County's Affordable Housing Challenges and Future Outlook**

### **Current Affordable Housing Deficit**

According to the 2022 Affordable Housing Dashboard (Kem C. Gardner Policy Institute), Salt Lake County is facing a critical shortage of affordable housing. The current deficit stands at approximately 42,000 units for households earning at or below 50% of the Area Median Income (AMI), including populations at or below 30% AMI. This gap significantly impacts low- and extremely low-income households, further emphasizing the county's urgent need for affordable housing solutions.

### **Projected Population Growth and Housing Demand**

Salt Lake County is projected to experience exponential population growth, and current housing strategies are insufficient to meet the demand. By 2040, the county will require approximately 200,000 additional housing units to accommodate its growing population. The state of Utah has been exploring strategies to create more attainable housing, including making single-family homes smaller. However, this approach increases the cost per square foot, potentially inflating the housing market. Additionally, the state has introduced a first-time homeownership loan program, but the program's down payment assistance is likely insufficient for many first-time buyers. This strategy primarily aids market-rate builders in managing their inventory, rather than addressing the broader affordability issue.

### **PRO Housing Priority Areas and Challenges**

Salt Lake County has identified four PRO Housing priority areas, but three of these areas are either extremely costly to develop or impossible to build on due to their locations in canyons or mountainous regions. The only viable priority area is Holladay City, where Salt Lake County plans to focus its PRO Housing efforts. The Mayor of Holladay City has expressed support for the initiative and provided a letter outlining the city's housing needs and commitment to assisting with new projects. Priority will be given to developments in this area to maximize the impact of the PRO Housing program.

### **Population and Housing Market Trends**

According to the HUD Comprehensive Housing Market Analysis for Salt Lake City, the area is expected to see steady population and household growth over the next three years due to the continued strength of the local economy. From 2011 to 2014, Salt Lake County experienced slower population growth, averaging 16,400 new residents per year. However, increased net in-migration\* due to economic opportunities is expected to drive population increases, with the population forecasted to grow by 16,700 people annually over the next three years.

During this period, the number of households is expected to rise by an average of 6,825 households annually, bringing the total to 458,800 households by the end of the forecast period. Additionally, international migration, which had been subdued due to the pandemic, is anticipated to resume. Net out-migration to neighboring areas such as Ogden-Clearfield is also expected to subside, as the comparative advantage of cheaper housing in those areas diminishes.

Salt Lake County's housing market will continue to feel pressure as more workers are drawn to the region by employment opportunities. The county's ability to meet its affordable housing needs, especially for low-income households, will depend on the successful implementation of long-term housing strategies and regional collaboration.

### ***iii. Key Barriers (10pts)***

Despite progress made by Salt Lake County to address the housing crisis, several key barriers continue to hinder the production and preservation of affordable housing:

#### **Opposition to Zoning Reform**

One of the primary barriers is resistance to zoning reform, even when proposed projects align with the objectives outlined in local Moderate-Income Housing Plans (MIHPs). This resistance often stems from NIMBYism (Not In My Backyard), where community opposition arises despite the need for increased housing density. The reluctance to embrace higher-density housing development limits the county's ability to expand affordable housing options and meet growing demand. Promoting zoning reform remains essential to allowing more flexible land use and accommodating affordable housing developments.

#### **Challenges in Economic Development and Affordability**

Utah has built a reputation for strong economic development by allowing private entities to lead the way in development. However, despite this economic success, many residents find it difficult to afford housing in the state. To address this disconnect, the Salt Lake County Housing and Community Development (HCD) team is focusing on the creation of a Community Land Trust/Bank (CLT/CLB). This tool is designed to protect publicly owned land for future affordable housing projects while allowing for small returns to the county's partners.

The CLT model offers several advantages. By separating land ownership from housing development, it helps lower overall project costs. The CLT can perform horizontal pre-development while developers raise funds for construction. Furthermore, Salt Lake County's unique position allows it to work with local land-use authorities to ensure proper zoning is in place by the time construction is ready to begin. The CLT will also reduce the cost of building and acquiring land, a significant barrier to affordability, by keeping land costs separate from building expenses and providing low-cost, patient capital.

#### **Lack of Progress in Implementing Low-Moderate Income Housing Plans**

In 2022, the Utah State Legislature passed a mandate requiring cities to implement Low-Moderate Income Housing Plans to combat the housing crisis. Unfortunately, little progress has been made in many cities due to various factors, including *lack of bandwidth, limited understanding of the development process, and a lack of motivation to build affordable housing*. Cities struggling to meet these requirements represent a missed opportunity in addressing the state's affordable housing needs, further perpetuating the crisis.

### **Tech Job Decline and Its Impact on the Housing Market**

Initially, Utah sought to establish itself as a tech hub with the development of Silicon Slopes, attracting tech companies and creating jobs. However, a recent study presented at a Salt Lake County Council meeting revealed that \*tech jobs are actually in decline. This downturn in the tech sector has had a ripple effect on the job market, leading to less income generation from these companies and, in turn, negatively impacting the housing market. The decline in tech jobs reduces housing demand and affordability for those affected by job losses.

### **Conversion of Affordable Housing to Market Rentals**

Another significant barrier is the ongoing conversion of affordable housing projects into market-rate rentals. This trend further reduces the already limited stock of affordable housing in the county. Although Utah has established a state-funded housing preservation fund aimed at purchasing at-risk affordable housing, this fund has struggled to keep pace with the rising costs of land and buildings. Over the past three years, the fund has been able to acquire some properties, but it has not been sufficient to prevent the broader trend of housing units losing their affordability due to market forces. Rising real estate prices continue to outpace the funding available for preservation efforts.

To overcome these barriers, Salt Lake County will need to advocate for zoning reform, fully utilize tools like the CLT/CLB, and collaborate with cities to accelerate the implementation of low-moderate income housing plans. Addressing these challenges is crucial to meeting the county's affordable housing needs and ensuring housing stability for its residents.

### **Leading Barriers to Affordable Housing Production**

**Need for Zoning Reform:** Much of the land available for housing development in Salt Lake County is zoned for single-family homes, limiting opportunities for higher-density, affordable housing. Zoning reform is necessary to allow for greater density and more diverse housing options.

**Resistance to Increased Density in Established Neighborhoods:** Established neighborhoods often resist efforts to increase density, citing concerns about changes to their community. This resistance hinders the development of affordable housing in areas where it is most needed.

**Cost of Land:** The high cost of land in Salt Lake County is a significant barrier to affordable housing development. Rising land prices make it challenging to build affordable units without significant subsidies or financial support.

**Cost of Construction:** The overall cost of construction, including labor and materials, continues to rise, making it difficult to produce affordable housing units that are financially feasible for both developers and buyers.

**Lack of Infrastructure Investment:** Certain areas within the county lack the infrastructure investment needed to support future housing development. Without improvements in transportation, utilities, and other essential services, these areas remain underdeveloped, further limiting affordable housing options.

### Identified Key Barriers

The identified barriers are critical because they directly impact both the production and preservation of affordable housing in Salt Lake County. **Zoning reform** is essential because the majority of land available for housing development is designated for single-family homes, limiting opportunities for higher-density projects. This lack of density has led to significant **rental inflation**, making the rental market nearly as unaffordable as homeownership, with a **shortage of rental housing** further exacerbating the issue.

The **cost of land** remains the largest barrier to homeownership, as high demand continues to drive prices up, putting real estate out of reach for many. Similarly, **construction costs**, worsened by ongoing supply chain issues from the COVID-19 pandemic, are hindering development. These costs make it difficult for affordable housing projects to remain viable.

Furthermore, the **lack of infrastructure investment** in certain areas, such as Tooele County, prevents necessary development. Without essential infrastructure, like water access, development cannot proceed. Companies like Rio Tinto Kennecott have been working on infrastructure development but have struggled to find funding partners, slowing progress over the past two years. These barriers collectively prevent Salt Lake County from addressing the growing demand for affordable housing.

### Legal, Regulatory, and Land Use Policy Barriers

Salt Lake County faces several key legal, regulatory, and land use policy barriers that hinder the development and preservation of affordable housing. One of the main barriers is **permitting procedures and approval timing**. The permitting process in many cities across the county is inefficient and slow, causing delays in project timelines and increasing the overall cost of development. This lack of predictability can deter developers from pursuing affordable housing projects, as the extended timelines make it difficult to meet the urgent demand for housing.

Another significant barrier is **zoning and land use controls**, which are the largest obstacles to affordable housing development in both the state of Utah and Salt Lake County. Much of the zoning is designated for large single-family homes, which is counterproductive to addressing the high demand for more diverse and affordable housing options. Additionally, NIMBYism is prevalent among some city officials and their constituents, further complicating efforts to introduce higher-density housing. This mentality resists changes to established neighborhoods, blocking opportunities for affordable housing development.

The following excerpt highlights the critical concerns regarding housing affordability in Utah, reflecting the sentiments of voters and community leaders. It underscores the urgent need for action to address the housing crisis in the state.

*“The cost of living in Utah — thanks to expensive housing and inflation — is among the top concerns for the state’s voters this year, according to a new poll released by the Utah Foundation. Another top concern? That lawmakers are turning a deaf ear. Housing affordability was the Number 1 issue Utahns want state policymakers to address, according to the think tank’s policy priority survey which they conduct every gubernatorial election cycle. But politicians not listening to voters came in a very close second. These two issues, which were categorized as “most important” on the poll’s best-to-worst scale, were followed by the difficulty of earning enough to pay for non-housing needs and the obstacle of government overreach, which were both ranked as having “high importance. We have to accept the fact that change is coming,” Waldrip said. “We have to accept the fact that our kids and our grandkids need housing. We have to accept the fact that in order to find that housing, we have to build more. And we can’t build more everywhere else, we have to build more where we are. If Utah lawmakers, community leaders and developers fail to increase the number of smaller, more affordable single-family detached housing, then an entire generation of Utahns could be cut off from the American dream, Waldrip said, because homeownership is the “No. 1 savings vehicle” for middle-class families. This excerpt illustrates the urgency of addressing housing affordability and the significant barriers that need to be overcome to ensure that future generations have access to affordable housing in Utah. “It is, frankly, an existential crisis,” Waldrip said.<sup>15</sup>*

## Key Legal, Regulatory, and Land Use Policy Barriers

---

<sup>5</sup> The Utah Foundation (2024, March 20). *Utah Voters and Leaders Agree Cheaper Housing Should be the State’s No. 1 Policy Priority*. UtahFoundation.org. <https://www.utahfoundation.org/news/utah-voters-and-leaders-agree-cheaper-housing-should-be-the-states-no-1-policy-priority/>

Salt Lake County (SLCo) faces several legal, regulatory, and land use policy barriers that hinder the production and preservation of affordable housing. One significant issue is the historical tendency of SLCo to develop the wrong asset types on its own land, which does not align with the community's needs for affordable housing. This misalignment further exacerbates the existing housing crisis.

Infrastructure constraints also pose a substantial challenge. There is a notable lack of essential resources, such as water and energy-efficient homes, which are critical for sustainable development. This deficiency limits the county's ability to support new housing initiatives, particularly in areas where growth is needed the most.

Additionally, prohibitive building codes are a barrier to increasing housing density. Although Salt Lake City has begun constructing smaller mixed-use buildings—typically four to five stories with apartments above commercial spaces—many of these assets remain vacant due to insufficient activity and demand. To effectively address the acute housing shortage, SLCo needs to increase density, as supported by engineering assessments. By doing so, the county could generate the number of units necessary to meet housing needs, thereby softening the rental market. This, in turn, would eventually lead to a more stable ownership market.

Implementing zoning and building code reforms could create a positive domino effect, unlocking the potential for more attainable housing options. By adjusting these regulations to facilitate higher-density developments, SLCo can make significant strides in overcoming the barriers currently hindering affordable housing production and preservation in the region.

These combined barriers—slow permitting processes, restrictive zoning, and resistance to increased density—create procedural and regulatory hurdles that need to be addressed to facilitate the production and preservation of affordable housing in Salt Lake County.

“I could scare you with a lot of numbers. And hopefully this does a little bit because we need to be scared into action.” <sup>6</sup>

## Exhibit D Soundness of Approach (35pts)

### *i. Vision*

Salt Lake County (SLCo) envisions a robust and sustainable housing landscape that promotes affordable living for all residents. To achieve this vision, the county has outlined two primary activities under the HUD PRO Housing initiative, which are tailored to address the identified needs while leveraging the county's capacity.

#### **Use 1: Community Land Trust Investment Fund (CLT IF) - \$6,050,000**

---

<sup>6</sup> The Utah Foundation (2024, March 20). *Utah Voters and Leaders Agree Cheaper Housing Should be the State's No. 1 Policy Priority*. UtahFoundation.org. <https://www.utahfoundation.org/news/utah-voters-and-leaders-agree-cheaper-housing-should-be-the-states-no-1-policy-priority/>

The first use of funding is the establishment of a Community Land Trust Investment Fund (CLT IF), which will serve as a revolving loan fund designated for various development activities, including predevelopment and hard construction costs. This initiative aligns with the identified eligible uses in the Notice of Funding Opportunity (NOFO) under preservation activities. The SLCo Housing and Community Development (HCD) team will assess SLCo-owned parcels to identify those suitable for inclusion in the Community Land Trust/Community Land Bank (CLT/CLB) once it is established.

Through this fund, the HCD team will provide short-term, low-interest gap financing loans to partner developers, enabling them to produce the necessary affordable housing products. This strategic approach not only promotes the development of affordable housing but also fosters partnerships with local developers committed to meeting the county's housing needs.

### **Use 2: Establish Community Land Trust/Community Land Bank - \$124,000**

The second use of funding focuses on establishing the Community Land Trust/Community Land Bank (CLT/CLB) through comprehensive planning and policy activities that support affordable housing. This includes developing or updating housing plans, community development strategies, and zoning and land use policies aimed at encouraging multifamily and mixed-use development.

#### **Key activities will involve:**

- Creating overlays that promote access to affordable housing and establishing floating zones for workforce housing and transit-oriented developments.
- Streamlining existing housing plans and policies to eliminate barriers, such as architectural reviews and historic preservation overlays, that impede affordable housing development.

The SLCo HCD team will coordinate closely with the Real Estate office to evaluate SLCo-owned parcels for their potential in affordable housing development. They will also suggest necessary zoning changes to facilitate this development and provide recommendations to the Mayor's office and relevant partners.

Both proposed Uses are designed to effectively address the pressing need for affordable housing in Salt Lake County while capitalizing on the existing capacity of the HCD team. By establishing the Community Land Trust Investment Fund and the Community Land Trust/Community Land Bank, SLCo is poised to make significant strides in increasing the availability of affordable housing and fostering sustainable community development.

### **How Proposed Eligible Activities Meet National Objectives**

The proposed activities for the Community Land Trust Investment Fund (CLT IF) and the establishment of the Community Land Trust/Community Land Bank (CLT/CLB) align with key

national objectives as outlined in the Notice of Funding Opportunity (NOFO), specifically addressing low- and moderate-income needs, preventing blight, and meeting urgent community development needs.

**a. Benefiting Low- and Moderate-Income Persons**

The activities are designed to directly benefit households at or below 80% of the Area Median Income (AMI).

- The establishment of the CLT/CLB will allocate a small portion of the funding (\$124,000) to support affordable housing development, ensuring that units created will remain affordable for low- and moderate-income residents.
- The revolving loan fund will provide essential financing for development activities, allowing projects to proceed efficiently while generating small returns for the Salt Lake County Housing and Community Development (SLCo HCD) team.

**b. Preventing or Eliminating Slums or Blight**

The CLT/CLB serves as a critical mechanism for protecting publicly owned land, ensuring it is reserved for future housing development needs.

- By using the revolving loan fund, SLCo HCD gains the flexibility to invest in various stages of the development cycle, addressing needs as they arise.
- Properties placed within the CLT will be shielded from becoming vacant and blighted, thereby promoting long-term affordability and preventing deterioration in the community.

**c. Meeting Other Community Development Needs with Urgency**

The existing Housing Trust Fund Advisory Board structure allows for the immediate deployment of funds to projects on pre-identified county-owned land, which is essential given the urgent housing crisis.

- Funds for establishing the CLT/CLB can also be utilized immediately to initiate necessary activities.
- All capital funds will be awarded to relevant entities within six months of receiving the HUD award, ensuring that timely action is taken to address pressing housing needs.

**Timeframe of Expected Benefits**

The proposed activities are structured to provide immediate benefits to the community, with funds allocated and projects initiated within a six-month timeframe post-award. This rapid deployment will facilitate the swift creation of affordable housing options, addressing urgent community needs and improving the overall quality of life for residents in Salt Lake County.

**Addressing Key Barriers to Affordable Housing Production and Preservation.**

SLCo's proposed activities effectively addresses the key barriers to affordable housing production and preservation by directly tackling the lack of available and developable land, which is consistently identified as the foremost challenge by developers. By leveraging County-owned land for the Community Land Trust/Community Land Bank (CLT/CLB), this proposal removes the significant barrier of land availability entirely. This strategic approach not only shortens the development timeline but also significantly reduces overall development costs, making it easier and more feasible for developers to produce affordable housing. By utilizing these public assets, the proposal ensures that housing projects can be initiated swiftly, thereby facilitating the timely delivery of affordable housing options to meet the urgent needs of the community..

### **Connection Between Proposed Activities and Identified Key Barriers**

The proposed activities are intrinsically connected to the key barriers identified, particularly the lack of capital funding, which has been a significant obstacle to developing County-owned land. While the land is readily available for use, the absence of adequate financial resources has hindered progress in transforming these assets into viable affordable housing solutions. By utilizing PRO Housing funds in conjunction with the existing County-owned land, the proposal aims to overcome this financial barrier, enabling the swift and cost-effective construction of affordable housing. This strategic alignment of resources not only accelerates development timelines but also maximizes the potential of public assets, ultimately addressing the pressing need for affordable housing in the community.

### **Why the Proposed Approach is Expected to Succeed in Removing Identified Barriers**

The proposed approach is expected to succeed in removing the identified barriers to affordable housing production and preservation due to its alignment with successful strategies implemented by other counties. Salt Lake County is currently one of six counties participating in a cohort with the National Association of Counties (NACo), which specifically focuses on utilizing public land for affordable housing development. This approach, which mirrors the concept proposed in this application, has been recognized as a proven method for quickly producing affordable housing. Furthermore, one of the cohort sponsors, Smart Growth America, has published multiple reports highlighting the advantages of a public/private model in fostering affordable housing development (<https://smartgrowthamerica.org/resources/>). These insights and best practices underscore the viability of leveraging County-owned land, thereby enhancing the likelihood of significant increases in the production and preservation of affordable housing.

### **How Proposed Activities Align With and Advance Local Efforts**

The proposed activities align with and advance local efforts to remove regulatory, procedural, and land use barriers to housing production and preservation by leveraging publicly owned land, a viable alternative within the constraints of Utah state law, which restricts strategies such as rent

control and inclusionary zoning. By utilizing community land trusts to manage these public parcels, Salt Lake County can create affordable housing at scale while operating within existing regulatory frameworks. The County owns over 1,800 parcels of vacant land, which presents a substantial opportunity to develop affordable housing without the added challenge of acquiring expensive land. Moreover, this approach allows the community to enhance vacant parcels rather than demolishing existing structures that could still serve important community needs, thereby fostering both housing development and community improvement.

### **How Proposed Activities Will Create New Housing Opportunities Without Displacement.**

One key aspect of utilizing publicly owned land in combination with a community land trust (CLT) is that it effectively prevents gentrification and ensures the preservation of affordability in perpetuity. This approach allows residents of historically low-income areas to remain in their communities while benefiting from beautiful new homes and apartments offered at affordable rates. Unlike traditional financing models that rely on privately owned land, which often lead to inflated rents and home prices, this strategy safeguards against the displacement of lower-income households. By maintaining affordability in these neighborhoods, we can support long-standing residents, ensuring they are not pushed out of the areas they have called home.

### **Comparisons to Similar Efforts and Lessons Learned from Those Efforts**

Currently, there are no similar efforts being proposed like the community land trust/community land bank (CLT/CLB) initiative in Salt Lake County. However, the SLCo HCD team has formed strategic partnerships that will position them as the lead in this innovative approach once it is established. By drawing on insights from past collaborative housing initiatives, the team aims to implement best practices while tailoring their strategy to the unique challenges and needs of the community. This ensures a well-informed and effective proposal that leverages existing resources and expertise to maximize impact.

### **Successes of Previous Efforts to Undertake Similar Proposals**

Nothing like this has been done before within Salt Lake County, highlighting the innovative nature of the proposed community land trust/community land bank initiative. The innovative nature of the proposed Community Land Trust/Community Land Bank (CLT/CLB) is appropriate as it leverages publicly owned land to address the pressing affordable housing crisis in Salt Lake County, effectively removing barriers related to land acquisition and development costs. By establishing a sustainable model that ensures long-term affordability, this approach not only preserves existing neighborhoods but also fosters inclusive communities without displacing current residents.

### **How Proposed Activities Advance and Complement Existing Planning Initiatives**

The proposed Community Land Trust/Community Land Bank (CLT/CLB), along with the revolving loan fund, will enable Salt Lake County's Housing and Community Development (HCD) team to swiftly implement strategies that align with existing planning initiatives and land use policies. Three key actions are essential for facilitating affordable housing development: first, the establishment of the CLT/CLB to identify available land; second, executing partnerships with both public entities to contribute land or funding and private developers to clarify how SLCo HCD will leverage financial resources; and third, issuing a Request for Applications (RFA) through the Salt Lake County Housing Trust Fund (HTF) to secure development funds for partners. This approach not only addresses the immediate need for affordable housing but also complements broader community goals, such as transportation planning and economic development, while accounting for expected population changes.

### **How Proposed Activities Align With Local and Regional Transportation Plans**

The proposal is directly aligned with local and regional transportation plans as it involves a thorough analysis of parcels to determine their developability for affordable housing. This analysis includes suggestions for mixed-use developments along key travel corridors, ensuring that new housing is situated in areas with accessible transportation options. Additionally, the Salt Lake County Housing and Community Development (HCD) team, in collaboration with the GIS team, is creating an affordable housing map that integrates current and planned transportation developments. Furthermore, HCD may partner with the Salt Lake County transportation team to invest in infrastructure improvements that support future affordable housing projects, enhancing connectivity and accessibility for residents.

### **Improved Simplification and Harmonization of Land-use Regulations**

SLCO's proposed plan improves the simplification and harmonization of land-use regulations across multiple municipalities and entities. It provides a straightforward framework that enables a team of experts to offer guidance to public partners in addressing affordable housing needs while establishing efficient systems to protect public land and interests, thus reducing reliance on private development for housing solutions.

### **Alignment With Anti-displacement Strategies**

SLCO's proposed plan aligns with anti-displacement strategies to ensure that the benefits of investments accrue to all, particularly long-time residents of the neighborhood. The Community Land Trust/Community Land Bank (CLT/CLB), along with the revolving loan fund, directly supports neighborhood resiliency by safeguarding land from being sold to private developers, thus preserving affordability and stability for existing residents.

### **Targeting New Housing Opportunities**

The proposed plan targets new housing opportunities in areas that will enable current and future residents to access public transit, jobs, public services, and other amenities. By utilizing the

Community Land Trust (CLT) with county-owned land, housing can be developed in traditionally inaccessible parts of the county, thereby expanding opportunities for residents. Additionally, the Housing Trust Fund Opportunity Map and ongoing collaboration on affordable housing analysis for Salt Lake County and the state will help identify areas of need versus where affordable housing currently exists, ensuring a strategic approach to job creation and retention efforts across the region. Most of the existing affordable housing inventory is concentrated in Salt Lake City proper, South Salt Lake, and parts of Midvale and Murray, highlighting the need for more equitable distribution.

## Environmental Risks

### Community Disaster Resilience Zone

One census tract in SLCo, #49035111500, is identified as a Community Disaster Resilience Zone by FEMA.<sup>7</sup>

### Future Risks

Many census tracts in SLCo have high Risk Index scores and are classified as disadvantaged communities according to the Climate and Economic Justice Screening Tool.<sup>8</sup> These areas face significant risks from natural hazards, extreme weather, and other disasters associated with the following.

- **Proximity to Hazardous Waste Facilities:** SLCo ranks in the 88th percentile for proximity to hazardous waste facilities within 5 kilometers. This concentration increases environmental contamination risks and associated health hazards for nearby communities.
- **Wastewater Discharge:** SLCo is in the 96th percentile for modeled toxic concentrations in streams within 500 meters, indicating severe water pollution risks. This pollution affects water quality, ecosystem health, and public health, particularly impacting communities reliant on local water sources.
- **Geological Risks:** Utah's climate and geography, including the Wasatch Fault, make it highly vulnerable to catastrophic natural disasters. The Wasatch Fault is considered one of the most probable catastrophic natural threats in the U.S., with a 43% likelihood of a major earthquake (6.75 magnitude or higher) within the next 50 years. Such an event could have devastating consequences, especially for vulnerable communities.

One significant roadblock that might impede the implementation of the proposal is the influence of political agendas within Utah's leadership. While there is a general discourse around housing issues, current leadership has not prioritized or promoted ideas that could lead to long-term

<sup>7</sup> <https://experience.arcgis.com/experience/e3bb8cb79d124a0ca38a05e48afb6fd6/page/Community-Disaster-Resilience-Zone-Viewer/>

<sup>8</sup> U.S. Government (2022, November 22). *Climate and Economic Justice Screening Tool*. Climate and Economic Justice Screening Tool. <https://screeningtool.geoplatform.gov/en/>

solutions for affordable housing. This lack of commitment can hinder necessary reforms and the streamlining of processes essential for the success of the Community Land Trust and Community Land Bank initiatives, ultimately delaying progress toward addressing the affordable housing crisis.

Salt Lake County envisions the establishment of a Community Land Trust Investment Fund (CLT IF) that will leverage low-cost capital to develop affordable housing under the Community Land Trust (CLT) framework. By maintaining ownership of the land developed for affordable housing, the CLT ensures that affordability is preserved in perpetuity. This approach capitalizes on publicly owned land, allowing the CLT IF to fund projects with a lower overall cost per unit. Additionally, utilizing a CLT minimizes the displacement of residents from areas historically inhabited by low-income and marginalized populations, effectively avoiding such disruptions altogether.

The creation of the CLT IF is in line with Salt Lake County's previous efforts to enhance affordable housing production. The County currently oversees the Housing Trust Fund Advisory Board, composed of local affordable housing experts who can efficiently review funding applications and make timely awards. Recently, the board has successfully allocated HOME-ARP and ARPA funds for affordable housing construction, and it will seamlessly incorporate the CLT IF into its funding allocation processes.

This plan enables Salt Lake County to leverage existing relationships with municipalities that possess County-owned land within their boundaries. By doing so, it reduces the barriers private developers face when seeking land and enhances the likelihood of success for projects funded by the CLT IF. Overall, this comprehensive strategy aims to address and mitigate potential obstacles to implementation while ensuring long-term sustainability in affordable housing development.

## *ii. Geographic Scope (5pts)*

The proposed Community Land Trust/Community Land Bank (CLT/CLB) and the revolving loan fund will have a significant and positive impact on communities throughout Salt Lake County. By targeting the development of affordable housing in areas with historically high needs, these initiatives will contribute to neighborhood revitalization, enhance community resilience, and promote equitable access to housing for low- and moderate-income residents. The utilization of county-owned land within the CLT/CLB framework will not only preserve affordability but also ensure that the benefits of new housing developments directly accrue to the existing residents of these communities, fostering a sense of stability and continuity in the neighborhoods of Salt Lake County.

The proposal will effectively preserve and create housing units in high-opportunity areas, particularly focusing on the City of Holladay, which is identified by HUD as a key high-priority area within Salt Lake County. The City of Holladay has demonstrated strong support for this initiative by providing a letter of support and outlining their commitment to partnering with Salt Lake County in directing funding towards projects within their jurisdiction. This collaboration not only facilitates the development of affordable housing in a desirable location but also expands opportunities for underserved communities by ensuring that residents have access to

essential services, employment opportunities, and quality amenities. By strategically investing in high-opportunity areas like Holladay, the proposal aims to enhance the overall quality of life for residents while addressing the pressing need for affordable housing throughout the region.

Salt Lake County, situated between two large mountain ranges, is the most populated of the 29 counties in Utah, making the affordable housing deficit a pressing concern across the entire region. Given the severity of this deficit, any area where housing can be created is considered a high need, and thus, all parts of the county will be eligible for awards from the Community Land Trust Investment Fund (CLT IF) established through the allocation of PRO Housing funds. While specific efforts will be concentrated on the City of Holladay for the creation of affordable housing, the CLT IF is designed to allow flexibility; should there be no suitable projects identified within Holladay, funds will be directed to other areas within the county that demonstrate a similar need. Additionally, as a pass-through entity operating the subgrant program, Salt Lake County will evaluate the geographic scope of sub applicants to ensure that funding is allocated effectively to address the diverse housing challenges faced throughout the county.

### ***iii. Stakeholders (5pts)***

Salt Lake County actively engaged a diverse range of key stakeholders during the development of this NOFO application, including homeless service providers, housing developers, local jurisdictions, and the two public housing authorities within the county. Outreach efforts were conducted by Salt Lake County staff who leveraged existing relationships and referrals to connect with these partners.

Feedback from stakeholders highlighted two primary challenges: the difficulty in locating suitable land for affordable housing development and the lack of capital to purchase and develop identified parcels. There was a consensus among partners that the shortage of affordable housing is the leading cause of homelessness in the county, particularly affecting those at the lowest Area Median Incomes (AMIs).

Meetings with both public housing authorities provided insight into their specific needs and barriers to increasing affordable housing production. Similarly, discussions with local affordable housing developers focused on capacity constraints, capital funding availability, land access, and potential solutions to the ongoing affordable housing crisis. Additionally, input from affordable housing operators and supportive service providers helped identify reasonable project sizes, essential design features, necessary resident services, and underserved areas in the county.

Once funding is secured, Salt Lake County staff will maintain ongoing communication with these stakeholder groups, as well as with clients residing in projects funded by the Community Land Trust Investment Fund (CLT IF). This continued engagement will ensure that housing solutions remain responsive to the evolving needs of low-income residents in the community.

#### ***iv. Alignment with Requirements (5pts)***

The innovative approach outlined in the proposed project will leverage publicly owned land, allowing for the development of affordable housing without the high costs typically associated with acquiring land in these desirable locations. By utilizing county-owned parcels, the CLT/CLB model not only expedites the development process but also maintains affordability in perpetuity.

Additionally, the proposal aims to actively engage underserved groups by ensuring that the affordable housing units are designated for households at or below 80% of Area Median Income (AMI). Through partnerships with local jurisdictions and community organizations, Salt Lake County will prioritize outreach to marginalized populations, including those experiencing homelessness and low-income families, ensuring they have access to housing opportunities in high-opportunity areas.

The commitment to building mixed-use developments along transit corridors further enhances access for underserved groups, promoting integration within the community and connecting residents to essential services, jobs, and amenities. By focusing on the strategic use of county-owned land and fostering inclusive partnerships, Salt Lake County's proposal will effectively increase access for underserved populations to well-resourced areas, promoting equity and opportunity throughout the region.

**Pending information: What is the racial composition of the persons or households who are expected to benefit from your proposed grant activities?**

Salt Lake County is a majority white, non-Hispanic but is the most diverse of all the counties in the state.

#### **Plans to Remove Barriers**

To effectively remove barriers impeding the development of affordable housing that promotes desegregation, Salt Lake County will leverage the Community Land Trust Investment Fund (CLT IF), a revolving loan fund designed to support all aspects of affordable housing development, from land acquisition to construction. This strategic approach allows for targeted investment in identified parcels, ensuring that affordable housing opportunities are created in high-opportunity areas rather than solely in neighborhoods with existing affordable housing.

While the policies of the Community Land Trust (CLT) and Community Land Bank (CLB) may not directly address segregation, the inherent nature of affordable housing requirements will facilitate desegregation by promoting mixed-income communities. By utilizing the identified parcels and access to opportunity maps, the Salt Lake County Housing and Community Development (SLCo HCD) team can pinpoint suitable county-owned lands for affordable housing development in neighborhoods with greater resources and opportunities.

Furthermore, the SLCo HCD team will identify and analyze other publicly owned properties, ensuring a collaborative effort to guide and partner with local municipalities on affordable housing projects. This proactive stance will help avoid further concentration of affordable housing in low-opportunity areas and promote equitable distribution across the county. By integrating these strategies, Salt Lake County aims to create diverse, inclusive communities that break down barriers to housing access and promote desegregation.

### **Increasing Housing Choice**

The proposal will significantly increase housing choice by expanding the neighborhoods in which residents in need of affordable housing can live. Salt Lake County's diverse property portfolio spans the entire county, allowing for the strategic utilization of county-owned parcels to facilitate affordable housing development in areas where land costs would typically prohibit such projects. By leveraging these publicly owned lands, affordable housing can be built in higher-opportunity neighborhoods that would otherwise remain inaccessible to low-income households.

Additionally, Salt Lake County is actively collaborating with other public entities to incorporate their lands into the Community Land Trust model. This approach not only enhances the availability of affordable housing options but also grants low-income households access to neighborhoods that offer improved resources, amenities, and social networks. Projects prioritizing development in higher-opportunity areas, as identified by HUD and highlighted in the Opportunity Atlas, will further ensure that residents can benefit from increased access to quality education, employment opportunities, and essential services. Ultimately, this initiative aims to create a more equitable distribution of affordable housing across the county, fostering diverse and inclusive communities.

**D.iv.3: How does your approach address the unique housing needs of members of protected class groups, including persons with disabilities, families with children, and underserved communities of color?**

The proposed approach effectively addresses the unique housing needs of members of protected class groups, including persons with disabilities, families with children, and underserved communities of color, by utilizing the Community Land Trust (CLT) model. Established since the 1980s in the United States, one of the primary goals of a CLT is to prevent the displacement of historically marginalized communities—particularly those predominantly occupied by Black and Brown residents—by ensuring that housing remains affordable and accessible. By developing affordable housing through a CLT, Salt Lake County can maintain the affordability of housing and prevent households from being forced to relocate due to the influx of new, unaffordable developments.

Moreover, while other development models may impose long-term deed restrictions that eventually allow properties to transition to market or luxury rates, the CLT model preserves land

in perpetuity for affordable housing. This structure guarantees that properties are only transferred to households in need, significantly reducing the risk of displacement for vulnerable residents in communities of color.

Additionally, this proposal will address issues identified in Salt Lake County's most recent fair housing plan by focusing on equitable access to affordable housing. Salt Lake County recognizes the pressing need to mitigate displacement risks associated with new developments. By employing the CLT framework, the county will safeguard the interests of current residents, ensuring they remain in their homes while benefiting from investments in their communities. This strategy aims to create resilient neighborhoods that honor the history and demographics of the area while promoting sustainable growth..

### **Displacement Measures**

SLCo has made a firm commitment to preserving rental and homeowner-occupied housing units and promoting homeownership. This commitment is a key pillar of the Salt Lake County Consolidated Plan, which is dedicated to ensuring an equitable focus on preserving and revitalizing housing to address the most urgent needs.

The activities outlined in this application will not result in the displacement of residents. By preventing displacement, the project helps ensure that residents continue to benefit from local green spaces, public transportation, and other environmental amenities that contribute to a higher quality of life.

SLCo's PRO-Housing Project creates a supportive environment that addresses the broader needs of underserved individuals, including those with disabilities. These efforts will help create a more inclusive and resilient community, where all residents, regardless of their socioeconomic status or physical abilities, can thrive.

SLCo will implement several meaningful actions to ensure that protected class groups have access to safe, accessible, and healthy manufactured housing. These actions include:

1. **Affordable Housing Development:** Increasing the supply of affordable housing units in diverse neighborhoods through manufactured home rehabilitation. Prioritizing projects that include accessible units for individuals with disabilities and those that increase environmental sustainability.
2. **Inclusive Zoning Policies:** Encouraging municipal stakeholders to revise local zoning laws to reduce restrictions that limit housing diversity.
3. **Changing Perceptions and Infrastructure Improvements:** Enhancing public perceptions of manufactured housing communities by improving infrastructure and quality of units.

Salt Lake County has incorporated equity-related educational resources and tools into this proposal by utilizing data from community input sessions, public forums, and equity assessments. The county regularly engages with diverse community groups, including low-income residents, minority populations, and housing advocates, to ensure that policies and

initiatives are inclusive and address the needs of vulnerable populations. Additionally, the county uses equity mapping tools to identify areas with the greatest need for affordable housing and ensures that public input informs decision-making processes throughout the development of the proposal.

SLCo plans to actively engage and support minority-, women-, and veteran-owned businesses during the housing production process. The county is committed to fostering diversity and inclusion in all aspects of its projects and will prioritize outreach to these businesses in procurement and contracting opportunities. By working closely with local chambers of commerce and business associations, Salt Lake County aims to ensure that minority-, women-, and veteran-owned businesses have equitable access to participate in the development of affordable housing. This approach not only promotes economic empowerment but also strengthens the local economy and builds capacity within underrepresented communities.

SLCo has a commitment to diversity, equity, and inclusion (DEI) and is actively working to further these values across all its programs and initiatives.

SLCo will evaluate the project's impact on promoting desegregation and expanding equitable access by tracking the location of affordable housing developments relative to areas of high opportunity, including proximity to quality schools, transportation, and employment centers. The County will also monitor the income levels and demographic profiles of individuals served to ensure a diverse and inclusive beneficiary population. By prioritizing mixed-income communities and utilizing tools like the county's mapping resources, Salt Lake County aims to de-concentrate affordable housing and provide equitable access to well-resourced neighborhoods.

## Tracking Progress

SLCo will track progress in advancing racial equity by collecting and analyzing demographic data on grant beneficiaries, including race, ethnicity, and income level. This data will be regularly reviewed to ensure that underserved populations are equitably benefiting from affordable housing projects. Additionally, the County will evaluate the geographic distribution of housing developments to ensure they align with goals of reducing segregation and expanding access to well-resourced areas.

Salt Lake County is committed to affirmatively marketing the benefits of housing units funded by PRO Housing funds through its established relationships with homeless and low-income service providers throughout the county. By leveraging these partnerships and the local coordinated entry process, new units will be effectively marketed to those most in need of housing, particularly marginalized demographic groups that may be unlikely to apply without targeted outreach efforts. Importantly, the Community Land Trust will utilize only vacant parcels of land, ensuring that no existing residents will be displaced. This approach guarantees that the housing developed on these vacant sites will remain affordable, as it will not be rented to market-rate tenants, but rather held in perpetuity for low-income households, thereby fostering community stability and inclusivity.

### **v. Budget and Timeline (5pts)**

Salt Lake County is requesting \$7mm, to begin expending immediately after award. Approximately \$6,050,000 will be utilized for the Community Land Trust Investment Fund (CLT IF). This will provide loans to affordable housing developers to construct single and multifamily housing on publicly owned land that will then be placed into the Community Land Trust for permanent ownership by the trust. Salt Lake County will immediately solicit projects that will utilize this funding. All awards will be in the form of no or low interest loans that will require repayment. As funds are repaid, they will then be loaned back out to new projects under this same model.

\$124K will be utilized to hire expert consultants to help Salt Lake County staff finalize the documents that will be utilized for CLT transactions. Due to the technical nature of these documents, a legal expert is required to ensure the CLT is able to conduct all transactions without any issues. The remaining money will provide the staffing necessary to see the CLT through its first three years. After that time, CLT fees combined with county general funds will provide the ongoing staffing costs. The remaining funding will be used to support the administration of both the CLT and the CLT IF.

Please see the Budget Worksheet for a full breakdown of PRO-Housing project costs.

The budget for this application was determined through consultations with community land trust experts who provided insights into the costs associated with creating the necessary legal and technical documents for establishing the Community Land Trust (CLT). This expert guidance ensures that the budget is both realistic and aligned with industry standards, facilitating the efficient creation and implementation of the CLT and enabling projects to come online more rapidly. Staffing costs have been calculated based on the support of one part-time staff member funded by the grant. Additionally, the remaining funds requested in accordance with the Notice of Funding Opportunity (NOFO) will be allocated to support the Community Land Trust Investment Fund, ensuring a cost-effective approach that is appropriate for the project's scope.

### **Award Modification and Project Expectation**

This application reflects a flexible project design that can adapt to varying funding levels from HUD. If awarded an amount less than the requested total, the project could adjust by reducing the initial allocation to the Community Land Trust Investment Fund (CLT IF) to a minimum of \$5,000,000. In this scenario, funds would be reallocated from the CLT consultant, which may delay the project's implementation but would still allow for successful outcomes. Should further cuts be necessary, staffing costs could also be reduced. Conversely, if awarded more than \$5,000,000, the additional funds would be directed to enhancing the CLT IF without requiring extra staffing or consultant costs. This adaptable approach ensures the project remains viable and effective, regardless of the final funding amount received.

If HUD awards less funding than requested, the proposal will be scaled thoughtfully to maintain its core objectives and ensure effectiveness. Key components, such as the Community Land Trust Investment Fund (CLT IF), will be prioritized to continue addressing the affordable housing needs in Salt Lake County. While we aim to retain the full scope of the project, adjustments may be made to enhance efficiency, such as temporarily reducing the initial allocation for consulting services. This approach would allow for a successful launch of the CLT while still keeping the project on track. However, we strongly believe that the full funding amount is essential to maximize the impact and sustainability of our efforts in providing affordable housing solutions for the community.

### Minimum Funding Required

The core activity of this proposal centers on administering the Community Land Trust Investment Fund (CLT IF). While the fund can operate at a smaller scale, a minimum funding amount of \$3,000,000 is necessary to effectively justify the staff time and resources that Salt Lake County would need to allocate for project administration. This funding level would enable the County to maintain essential oversight and support while ensuring that the CLT IF can deliver meaningful outcomes in addressing affordable housing needs within the community.

If funded at 50%, the estimated number of projects would be reduced to 5 total and the time it would take to fully implement the Community Land Trust would be significantly extended.

A reduction in funds would not impact the geographical scope of the project, and funds would still be prioritized for Holladay, SLCo's main priority geography in the County.

**SLCo PRO-Housing Activity Schedule is demonstrated below in Table X.**

Milestone	Description of Key Tasks	Timing and Duration	Verification Method
Community Land Trust (CLT) Documents Finalized	All CLT components have been reviewed and approved by Salt Lake County leadership	6 months post award	CLT documents have been formally voted on and approved by Salt Lake County Mayor
Community Land Trust Investment Fund (CLT IF) Active	CLT IF requirements and goals are integrated into the existing Housing Trust Fund framework	6 months post award	Housing Trust Fund Advisory Board has formally reviewed and approved changes to the structure of the Housing Trust Fund
First awards of CLT IF dollars made	Application will be created by the Housing Trust Fund Manager	9 months post award	The Housing Trust Fund Advisory Board has approved at least

			one award from the CLT IF
CLT completed first transaction	First parcel placed into CLT	12 months post award	Newly created CLT board has reviewed and approved the first parcel to be placed in CLT to be developed for affordable housing.
All funds received from the PRO Housing into the CLT IF awarded and under contract	All awarded projects have all required environmental reviews, legal documents, etc. And contracts signed by County and Subrecipient	18-22 months post award	Contracts executed and money completely awarded, verified by Salt Lake County Senior Leadership

## Exhibit E Capacity (10pts)

The PRO-Housing program will be administered specifically by the Housing and Community Development division within SLCo. The Director, Mike Akerlow, has over 15 years' experience working in government, specifically in relation to housing and the development of neighborhoods and affordable housing. Joshua Narvaez will be the manager overseeing the implementation of the program and will be responsible for ensuring that projects are completed timely and efficiently. Josh has spent the last 5 years serving low-income individuals and households experiencing homelessness. Josh administers the entirety of the Housing Trust Fund, a capital funding source seeking to invest in affordable housing solutions in Salt Lake County. This program is under the direction of the Housing and Community Development Director. Key management positions are demonstrated below in Table 1, as well as an organizational chart in Figure 1.

### Organizational Chart

Key Management	Positions	Project Role
Mike Akerlow	Housing and Community Development Division Director	Project Director
Joshua Narvaez	Housing Trust Fund Manager	Project Implementation and Oversight
Jennifer Jimenez	Operations Manager	Fiscal and Administrative Management

**Table 1: Key Management Positions**

SLCo has in-depth experience managing and expending grant funds to complete a project, including those from federal programs such as Community Development Block Grant (CDBG), HOME, Emergency Solutions Grant (ESG), American Rescue Plan Act (ARPA), and the Federal Home Loan Bank.

SLCo is an urban county qualified by the U.S. Housing and Urban Development (HUD) CDBG Entitlement Program and receives annual HUD CDBG and HOME allocations of approximately \$2.4 million and \$1.8 million, respectively. As the most-populated county in Utah, SLCo administers one of the largest grant entitlement areas in the state.

The following are the key staff from SLCo who be responsible for the Project.

<b>MICHAEL AKERLOW, HOUSING AND COMMUNITY DEVELOPMENT DIVISION DIRECTOR</b>
Michael will provide oversight of the program management team for the Project. He brings over 15 years working in both private and public roles related to community and housing development. He has managed multiple projects funded by federal programs such as CDBG, ESG, HOME, and ARPA and has personally overseen the development of thousands of affordable housing units across the state of Utah. Michael's past experience includes serving as the Executive Director of the Community Development Corporation of Utah and as Director of Housing and Neighborhood Development for Salt Lake City. Michael has a MS of Real Estate Development degree and serves on the Federal Home Loan Bank of Des Moines Advisory Council and the local board of the Salvation Army.
<b>JOSHUA NARVAEZ, Housing Trust Fund Manager</b>
The program will be overseen by Joshua Narvaez, who will be responsible for ensuring that each project is implemented effectively and within the established timelines. Josh has been working for the past five years to assist low-income individuals and families experiencing homelessness. He currently manages the Housing Trust Fund, Salt Lake County's capital investment initiative focused on affordable housing development. Under the supervision of the Housing and Community Development Director, Josh will apply his expertise to drive the success of this program.
<b>JENNIFER JIMENEZ, OPERATIONS MANAGER</b>
Jennifer will provide fiscal and administrative support to the Project, overseeing the financial and operational processes related to the grant, including federal reporting and invoice review. She has five years of experience working in IDIS, is the lead on the Salt Lake County Annual Action Plan and Consolidated plan process and has held a variety of positions at SLCo related to the administration of federal grants. Jennifer's previous experience includes working for a private non-profit shelter provider and local Public Housing Authority. Jennifer has her Master of Public Administration and is a certified HOME Compliance Specialist.

## Lead Agency

Salt Lake County (SLCo) will lead the implementation of the proposed HUD PRO-Housing activities through its Housing and Community Development (HCD) team. SLCo has a well-established track record of managing large-scale housing initiatives, including the administration of County Housing Trust Funds and a variety of federal, state, and local grants. The HCD team will oversee all aspects of the program, including the establishment and management of the Community Land Trust (CLT) and Community Land Bank (CLB), ensuring compliance with HUD regulations and maintaining strong partnerships with both public and private stakeholders. SLCo has experienced staff and structured processes in place, making it fully equipped to manage these activities effectively and efficiently.

SLCo has demonstrated its ability to manage complex projects and meet deliverables through its administration of both federal and local funds. Recent projects include the development of nearly 500 units of affordable rental housing and retrofitting 35 homes for aging-in-place residents using HOME and Federal Home Loan Bank funds. The county's financial management is robust, having received the Government Finance Officers Association Certificate of Achievement for Excellence in Financial Reporting and maintaining a AAA Bond rating, representing the top 1.3% of counties in the country. All grant funding and Smart Supervision financial activities must uphold these standards. These financial and administrative strengths ensure that SLCo will maintain high standards of fiscal responsibility and accountability while managing HUD PRO-Housing funds.

Through its combination of expertise, proven systems, and established partnerships, SLCo is fully prepared to lead the successful implementation of the HUD PRO-Housing activities and achieve the desired outcomes of the project..

### **Leadership Capacity**

As the largest county in Utah, SLCo oversees one of the state's largest grant entitlement areas, funding programs that address housing, food, health, safety, and economic needs for low- and moderate-income families. These programs have successfully facilitated emergency home repairs, down payment assistance, and major infrastructure improvements, benefiting thousands of residents.

In terms of management capacity, SLCo has extensive experience administering federal programs such as the Community Development Block Grant (CDBG), HOME Investment Partnerships Program, Emergency Solutions Grant (ESG), and American Rescue Plan Act (ARPA). SLCo is an urban county qualified under the U.S. Department of Housing and Urban Development (HUD) CDBG Entitlement Program, receiving approximately \$2.4 million annually in CDBG funds and \$1.8 million in HOME funds..

### **Partner-Dependent Project Status**

Design, implementation, administration, and reporting of SLCo's PRO-Housing activities will be undertaken solely by the County itself, and is not dependent

### **Experience with Large Scale Projects**

SLCo will lead the implementation of the proposed activities. SLCo works with local and regional partners, private industry, and community organizations to enhance and sustain access to safe and affordable housing throughout the county. By fostering collaboration and leveraging these partnerships, SLCo is dedicated to advancing affordable housing solutions and improving the quality of life for its residents.

SLCo Human Services manages an annual budget of approximately \$327 million, including \$80 million in federal, state, and local grants; \$101 million in Medicaid revenue funds; and \$800,000 in state revenue funds.

### **Grant Application Preparation**

This application preparation was led by Salt Lake County's Housing and Community Development (HCD) Program Manager, Russell Goodman. The HCD team worked closely with staff and decision-makers, maintaining regular communication throughout the development of the application. Russell will continue to coordinate with the County as the project progresses, actively supporting its growth and implementation. The HCD Director will also work with local, state, federal, and philanthropic resources to address priority needs for the county.

### **Experience with Civil Rights, Racial and Economic Disparities**

SLCo recognizes that, as is the case in many metropolitan areas, there are a number of populations within our community that have historically been underserved, marginalized, and disproportionately impacted by crime, violence, and victimization. SLCo will seek to utilize the insights and tools gained from current and previous projects to address these inequities and provide more effective service to underserved communities. Salt Lake County will seek to bolster services to these marginalized populations in the following ways:

- Identify and Analyze Disparities
- Targeted Outreach Programs
- Culturally Tailored Interventions and Language Accessibility
- Improved Service Navigation
- Data-Driven Advocacy

These activities directly relate to our overarching goals, including reduced recidivism, more effective supervision, improved quality and capacity of services, and focused resources for greater impact. As strategies are implemented based on insight received from the integrated data system, the marginalized communities within the county will see greater access to services and a larger number of positive outcomes from services received. Our project can become a powerful tool not only for information sharing but also for promoting equity and access to opportunities for historically underserved communities.

FY24 Pathways to Removing Obstacles to Housing (PRO Housing)  
FR-6800-N-98

## Exhibit F Leverage (10pts)

Salt Lake County is committed to addressing the affordable housing crisis by leveraging its existing resources, specifically through the strategic use of County-owned land. If awarded funding through the PRO Housing initiative, Salt Lake County will dedicate two parcels of undeveloped land to support the development of affordable housing. The total estimated land value of these parcels, as assessed by the Salt Lake County assessor, is \$5,119,600, with individual valuations of \$3,886,000 and \$1,233,600, respectively.

These parcels have been identified as the most suitable for affordable housing development based on their location, accessibility, and potential to meet community needs. The true value of these lands is expected to increase significantly once they are developed, as they will be assessed for their market potential at that time.

In addition to the immediate land contributions, Salt Lake County is committed to further enhancing its affordable housing efforts through the Community Land Trust model. This model will allow the County to systematically identify and utilize additional publicly owned lands, ensuring a sustainable approach to expanding affordable housing options. An attached letter details how these parcels will be utilized for affordable housing and confirms Salt Lake County's commitment to this initiative.

Through this leveraging of land resources, Salt Lake County not only enhances the financial viability of the proposed projects but also demonstrates its dedication to providing long-term solutions for affordable housing in the community. This proactive approach will create a foundation for future developments that align with the County's housing goals and address the pressing needs of its residents.

## Exhibit G Long-term Effect (10pts)

### Long-Term Effects and Outcomes

The proposed establishment of a Community Land Trust (CLT) and Community Land Bank (CLB) alongside the CLT Investment Fund (CLT IF) will create permanent and transformative impacts on Salt Lake County's affordable housing landscape. By removing key barriers to housing development, the proposed activities ensure sustained production and preservation of affordable units, providing long-term benefits that go far beyond immediate needs.

### Establishment of the CLT/CLB:

**- Enhanced Coordination and Partnerships:** The creation of the CLT/CLB will enable the Salt Lake County Housing and Community Development (HCD) team to align and strengthen interdepartmental efforts, driving toward shared housing goals. It will also foster the development of robust public and private partnerships for the allocation of land and funding for affordable housing projects.

- Long-Term Protection of Publicly Owned Land:** The CLT/CLB model ensures that County-owned land is protected for future development needs, giving SLCo and its public partners greater leverage in affordable housing initiatives. This will allow the County to retain control over development without submitting to private interests, ensuring that projects prioritize community benefits.
- Flexible and Sustainable Development:** By establishing the CLT/CLB, SLCo will have a flexible tool to address evolving development needs. All housing units produced through this model will be deed-restricted for low-income populations indefinitely, ensuring affordability for generations. Planned activities include developing new housing, purchasing distressed properties for adaptive reuse or permanent supportive housing, and investing in land infrastructure, creating a sustainable approach to housing.
- Revenue Stability and Tax Protection:** The CLT/CLB will generate a steady revenue stream for SLCo through housing projects and ensure that property taxes do not rise precipitously in affected areas. This, in turn, protects surrounding communities from the economic pressures of displacement and rising costs associated with new development.

#### **Success of the Revolving Loan Fund (CLT IF):**

**Agility and Financial Flexibility:** The revolving loan fund will provide Salt Lake County the financial agility to offer debt relief during different phases of the development cycle, ensuring projects can continue without significant delays. The short-term, simple interest loans will allow for revenue generation while keeping terms accessible to developers.

**Sustainable Growth:** As loan recipients repay their loans, the fund will replenish itself, minimizing the need for future infusions of capital. This self-sustaining mechanism will provide continuous support for the CLT/CLB and further encourage affordable housing development over time.

**Strengthened Partnerships:** The revolving loan fund will strengthen ties with development partners and further promote the CLT/CLB model. By easing financial barriers, it will attract new collaborators and projects, driving long-term affordable housing production across the county.

Overall, this comprehensive strategy ensures that the long-term production and preservation of affordable housing in Salt Lake County will be resilient, self-sustaining, and continually responsive to the community's evolving needs.

#### **Achievements Upon Completion**

Upon completion of the grant-funded activities, Salt Lake County (SLCo) will have made significant strides in addressing its affordable housing needs. Specifically, the initial award is expected to fund approximately six projects, creating between 300 and 500 affordable housing

units. These units will be perpetually owned by the Community Land Trust (CLT), ensuring that their affordability requirements are maintained indefinitely. Additionally, all repayments from the projects will be reinvested into new developments, making the Community Land Trust Investment Fund (CLT IF) a sustainable model for ongoing affordable housing production.

The successful establishment of the CLT/Community Land Bank (CLB) and CLT IF will demonstrate SLCo's commitment to being a leader in affordable housing development. Through these actions, the SLCo Housing and Community Development (HCD) team will not only deliver concrete outcomes but will also solidify its long-term and permanent partnerships with public and private entities. The launch of an open forum will further educate partners on the county's housing goals and invite them to take actionable steps alongside the HCD team in addressing housing challenges.

### **Model Representation for Other Communities**

Salt Lake County's (SLCo) proposal for the Community Land Trust (CLT) and Community Land Bank (CLB) represents an innovative and replicable model for addressing affordable housing needs, with strong support from key stakeholders and local leadership. Based on feedback from community stakeholders and mayors across the region, there is widespread interest in promoting and replicating this model. Multiple mayors have already expressed their willingness to invest local dollars in building affordable housing using the CLT/CLB framework in their own jurisdictions.

In addition to strong local support, two other key reasons why this model will serve as an example for other communities are:

**1. Sustainable and Scalable Funding:** The revolving loan structure of the CLT Investment Fund (CLT IF) ensures that the initial investment is perpetually recycled, allowing for continuous project funding without the need for constant infusions of capital. This creates a sustainable financing mechanism that other communities can adopt to meet their long-term affordable housing goals.

**2. Flexibility and Adaptability:** SLCo's model can be adapted to different local contexts, as it encourages the integration of publicly owned land and collaborative public-private partnerships. The use of the CLT/CLB allows for flexible project design, making it easier to address specific housing needs while protecting affordability in perpetuity.

SLCo can assist other jurisdictions in scaling or replicating this proposal by sharing best practices, providing technical assistance, and demonstrating how to establish similar funding mechanisms and stakeholder engagement processes. Through these collaborative efforts, other communities can successfully implement their own versions of this model.

### **Defining Success**



[Insert Company Address]

For the Salt Lake County (SLCo) Housing and Community Development (HCD) team, success by the end of the period of performance would be marked by several critical achievements. First and foremost, success would mean the establishment of a fully operational Community Land Trust (CLT) and Community Land Bank (CLB), with all necessary legal and technical structures properly in place.

Another key measure of success is the inclusion of 2-5 SLCo-owned parcels in the CLT/CLB, ensuring that land is preserved for affordable housing development. Additionally, the HCD team aims to build a network of 2-10 strong public and private partnerships to support the development of affordable housing. These partnerships will be instrumental in ensuring that the CLT/CLB has the financial and logistical backing to succeed in the long term.

Finally, success would include the establishment of the Community Land Trust Investment Fund (CLT IF), with funding secured and development activities ready to begin on the identified parcels. By the end of the performance period, the HCD team expects to have projects in the pipeline, creating a clear path toward affordable housing development and ensuring that parcels are ready for construction.

Looking beyond the performance period, the ultimate measure of success will be sustained production of affordable housing, continued partnerships, and a thriving CLT/CLB that continues to expand and meet the county's long-term affordable housing needs.

### **Enabling the Production and Preservation of Affordable Housing**

Salt Lake County's proposal leverages the Community Land Trust (CLT) and Community Land Bank (CLB), along with the establishment of a revolving loan fund, as a foundational strategy to enable both the production and preservation of affordable housing. These key components listed below provide a structured, long-term approach to solving the affordable housing crisis.

<b>1. Protection of Publicly Owned Land</b>
The creation of the CLT/CLB will allow Salt Lake County to <b>protect County-owned land</b> for future affordable housing development. This ensures that these lands are safeguarded for public use and affordable housing, giving the SLCo Housing and Community Development (HCD) team more leverage in negotiations with private partners. Publicly owned land will remain under the county's control, ensuring that development aligns with the community's needs and preventing private entities from solely determining the trajectory of housing projects.
<b>2. Flexible, Long-Term Housing Solution</b>
The CLT/CLB, coupled with the revolving loan fund, provides a flexible solution that enables the HCD team to respond to evolving development needs. It ensures that all units produced are indefinitely deed-restricted to support low-income populations, ensuring long-term affordability. By retaining ownership through the CLT/CLB, the county will preserve affordability without relying on market trends.
<b>3. Strategic Development Activities</b>
<p>This application outlines several strategic activities designed to promote affordable housing production, including:</p> <ul style="list-style-type: none"><li>• <b>Acquisition of land</b> for development through the CLT/CLB.</li></ul>

- **Investment in horizontal/infrastructure development** on land included in the CLT/CLB to prepare for housing projects.
- **Acquisition of distressed properties** (single-family homes, commercial buildings, or vacant land) for adaptive reuse, including permanent supportive housing (PSH) developments.

These initiatives are expected to result in **continuous affordable housing production**, with the revolving loan fund acting as a key financial tool to ensure that housing projects move forward swiftly and cost-effectively. This sustainable model will support long-term preservation, addressing both current housing shortages and future development needs within Salt Lake County.

### **Targeted Outcomes and Metrics to Address the Identified Need**

Salt Lake County's proposed PRO Housing focuses on utilizing the Community Land Trust (CLT) and CLT Investment Fund to address the shortage of affordable housing by making land available and facilitating the development of long-term, affordable units. The key metrics to measure success are designed to ensure that:

- land is secured for development,
- partnerships are established,
- and a significant number of housing units are created.

The metrics listed above will be demonstrated through the following measures:

#### **1. Capturing Parcels for Affordable Housing Development**

Success will be determined by the number of parcels of land incorporated into the CLT for affordable housing. The target outcomes include:

- Three Salt Lake County-owned parcels placed into the CLT for development.
- One additional parcel from another public entity placed into the CLT for affordable housing.

These actions directly remedy the identified need for suitable land by ensuring parcels are preserved for affordable housing and developed through sustainable partnerships.

#### **2. Leveraging Additional Funding**

Another critical outcome is leveraging financial support beyond PRO Housing funds. Salt Lake County aims to secure at least \$2,500,000 from local Redevelopment Agencies or other public entities. This additional capital will help finance construction, reducing reliance on external sources and ensuring the development moves forward efficiently.

#### **3. Housing Unit Creation**

Through the CLT Investment Fund, the county anticipates the creation of over 300 affordable housing units within the first 3 years. This target directly addresses the county's urgent need for affordable housing and ensures that housing is created at a steady pace.

By using these clear and measurable metrics, Salt Lake County will not only address the immediate need for affordable housing but also lay the foundation for sustained housing production and land preservation.

### Long-Term Impact on Removing Barriers to Affordable Housing and Expanding Access

Salt Lake County's proposal, centered on the Community Land Trust (CLT) and Community Land Bank (CLB), aims to remove longstanding barriers that have limited affordable housing production, particularly in well-resourced neighborhoods. The long-term effect of the proposal will be the preservation of land for affordable housing, preventing gentrification and ensuring that historically affordable areas remain accessible to future generations, including vulnerable populations and protected class groups.

A significant element of this strategy is the use of the SLCo Housing Trust Fund's mapping tool, shown in the graphic below, which identifies areas of opportunity for affordable housing development. This tool allows the Housing and Community Development (HCD) team to strategically focus efforts on neighborhoods that offer higher access to resources, employment, and education, while avoiding further segregation.

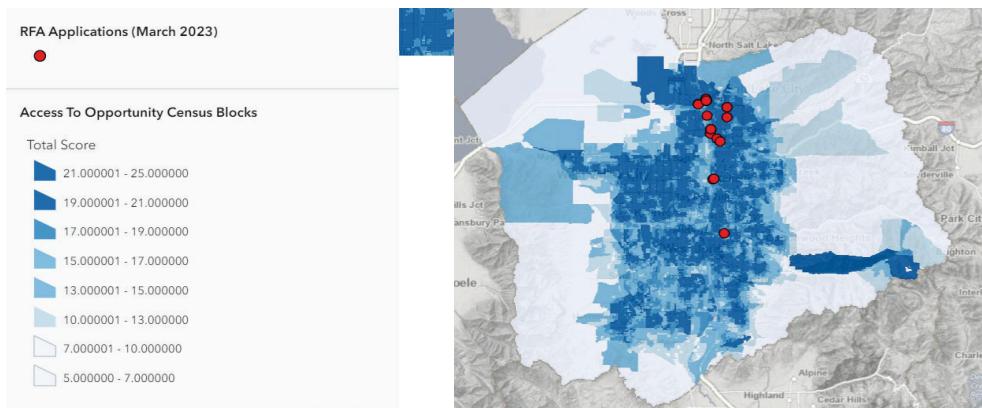


Figure 1 Access to Opportunity Map for the HTF 2023<sup>9</sup>

Through the CLT/CLB, affordable housing will be permanently deed-restricted for low-income households, ensuring long-term access to these well-resourced neighborhoods. By safeguarding county-owned land and partnering with other public entities, this proposal will expand housing opportunities in areas historically inaccessible to underserved populations, fostering integration and equal access to opportunity.

<sup>9</sup> <https://slco.maps.arcgis.com/apps/instant/sidebar/index.html?appid=a94554231159496e85f461bdf93c313>

FY24 Pathways to Removing Obstacles to Housing (PRO Housing)  
FR-6800-N-98