Utah Division of Housing and Community Development
Department of Community and Culture
2010-2015 Consolidated Plan (2011 Action Plan and Update 5/1/2011)

Utah's Consolidated Plan is used in requesting and allocating U.S. Department of Housing and Urban Development funds.

This format has been developed by the Utah Division of Housing and Community Development, in consultation with Utah's Associations of Governments planners. This format facilitates the development of local area Consolidated Plans and the State of Utah's state-wide Consolidated Plan. It should be used for preparing 5-year Consolidated Plans as well as annual local/area and state-wide Consolidated Plan updates and action plans. The format also allows for readily reporting accomplishments as part of the Consolidated Annual Performance and Evaluation Report (CAPER).

For the most part, Table 2C with actionable items listed serves as each year's Action Plan. Other actionable items related to impediments to fair housing are included in the separate Analysis of Impediments.

Local agencies are encouraged to utilize primary or best available data in preparing their plan and any annual updates/action plans. In assembling data for the tables, agencies work with local municipal officials for help with projections, needs, priorities, and plans. Local municipalities are encouraged to use the housing planning software available at: http://housing.utah.gov/OWHLF/documents to assist with population and needs projections. DHCD uses the data from area Consolidated Plans to 'roll up' to the state plan.

An EXCEL-based worksheet and guidance document accompanies this plan and populates the tables herein. The document also includes links to various HUD reference documents for agency reference in preparing their Consolidated Plan.

Executive Summary

Please provide a clear, concise narrative that includes the key objectives and outcomes identified in the plan and a brief evaluation or overview of past performance.

Consolidated Plan Narrative	***CAPER Narrative***

<u>Overview of Current Needs</u>: (See Table 2 A below) At the community level and within the jurisdiction of the Utah Consolidated Plan 2010-2015, the greatest need is for affordable housing. Although this need varies from community to community based upon demographics and the impact from the current economic downturn, data suggest that 55,916 housing units in Utah at less than 60% of the area median income have housing problems (for the areas covered by the Utah Consolidated Plan). The table shows that the most significant problem is the cost burden for housing. For the extremely low income households, 65.8% are cost burdened (with housing cost exceeding 30% of income). At the next income tier, that burden is 46.5% for very lower income households and 27.0% for low income households. *As listed in Table 2A, affordable units and rental subsidies are needed to serve special needs populations (elderly, frail, victims of domestic violence, homeless, and disabled populations). Besides supporting each community's need for affordable rental housing, other community priority needs include (for CDBG funding): culinary water, economic development, sewer, transportation, streets, and public safety. For the 2011-12 update, some changes in local priorities have occurred – those changes are reflected in changes in funding and the planned number of outcome units. In particular, DHCD notes the increased interest in creating more housing units for 5 persons or less and rehabilitation of existing units. Since last year, there has been some lessened interest in creating more units to serve certain special needs populations (see Table 2A and CDBG projects that focus on economic development, transportation, streets, and public safety.* *<u>Description of Overall Process for Fund Distributions:</u> Funds are all distributed through open public processes to eligible*	

entities in support of objectives per the Utah Consolidated Plan 2010-2015 and subsequent updates. Funding decisions are governed by allocation plans for each program that have also been adopted through public processes. In the case of HOPWA, HOME, and CDBG funding decisions, the governor has delegated that responsibility to public boards. A DHCD-appointed board determines ESG awards. *<u>Overview of Key Objectives and Outcomes</u>: See Table 2C below for all key objectives (actions) and outcomes. For the most part, Table 2C serves as the Action Plan for 2011-12. In addition, specific actions proposed for the year to assure and further Fair Housing are include in the table with the Analysis of Impediments (separately attached to this document .)* *<u>HUD's Strategic Plan:</u> the Utah Consolidated Plan Update and Action Plan 2011-12 substantially supports the give goals of HUD's Strategic Plan:* *1. Help to strengthen the nation's housing market to bolster the economy and protect consumers.* *2. Work to meet the need for quality affordable rental homes.* *3. Promote housing as a platform to improve quality of life.* *4. Build inclusive and sustainable communities free from discrimination.* *5. Transform the way HUD does business.* *<u>NOTE</u>: Data contained in this 2011-2012 Annual Update and Action Plan to the Utah Consolidated Plan differ from data contained in the five year plan submitted to HUD in 2010. The variance from last year's five year plan is due to changes in entitlement jurisdictions where some units of local government have been established as their own participating jurisdiction within the past year. In addition, one area association of local government refined data previously submitted*	

to DHCD. Those data changes also rolled up within the State of Utah's updated plan.	

Citizen Participation

Please provide a concise summary of the citizen participation process, a summary of any citizen comments or views on the plan, and efforts made to broaden public participation in the development of the Consolidated Plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities. The summary of citizen comments must include a written explanation of comments not accepted and the reasons why these comments were not accepted. The narrative should also address citizen input into the funding priority decision making process.

Consolidated Plan Narrative	***CAPER Narrative***
Each local planning agency's area Consolidated Plan details a process for outreach and citizen participation. A review of these plans show that each of the seven local planning agencies has made a concerted effort to seek public input into their planning, priority, and funding processes through mailings, questionnaires, forums, web posting, and public noticed hearings. A 30-day comment period has been adhered to by each agency. Those public comment periods (for all the local plans) all ended by January 31, 2011 and comments were forwarded to DHCD with each area's Consolidated Plan update and action plan for 2011-12. *For the new state five year Utah Consolidated Plan (2010-2015), the Division of Housing and Community Development adopted a "Public Participation Plan" (see below). The process and scheduled meetings for public input and comment have been advertised and are held in accordance with Utah's Open Public Meeting Law (per 52-4-502) and Utah Public Notice Website (per 63F-1-701).* *DHCD advertises the availability of the draft Consolidated Plan (and updates/action plans) statewide for a 30-day public comment period each year. Concurrent to that posting, the draft is posted to the DHCD website, and citizens and other public and private entities*	

were invited to contact staff with comments and questions. The formal public hearing was held at the DHCD offices by April 28th for the current program year (at 324 South State Street #500, Salt Lake City, Utah) in accordance with Utah's Open Public Meeting Law. This meeting is noticed statewide each year with electronic access to rural and remote areas upon request. Comments received at the hearings are posted and incorporated (where appropriate) into the final draft Plan (including updates and action plans). *As noted, the Consolidated Plan is consistent with other program plans promulgated by DHCD. Each of those other program plans also undergoes an annual statewide public comment and adoption period.* *This Utah Consolidated Plan (2010-2015) along with updates and action plans covers all geographic areas of the state except for certain areas of that are independent participating jurisdictions (PJ's). Independent PJ's are located in Salt Lake, Utah, and Davis counties. The local planning jurisdictions who have coordinated the local comment periods include: Six County Association of Governments (Piute, Sevier, Sanpete, Juab, Wayne, and Millard counties); Five County Association of Governments (Garfield, Washington, Kane, Beaver, and Iron counties; Southeastern Utah Association of Local Governments (San Juan, Emery, and Carbon counties); Uintah Basin Association of Governments (Daggett, Duchesne, and Uintah counties); Mountainlands Association of Governments (Utah, Summit, and Wasatch); Wasatch Front Regional Council (Davis, Weber, Tooele, and Morgan counties); and Bear River Association of Governments (Box Elder, Rich, and Cache counties).* *After being submitted in 2010, the Consolidated Plan was subsequently amended with a public posting and public hearing (held*	

on June 28, 2010) at the DCC offices for adoption and incorporation of a formal "Public Participation Plan" and "Limited English Proficiency Plan". No comments were received for either of these two additions to the "Utah Consolidated Plan 2010-14". *<u>DHCD Public Participation Plan</u>* *I. Applicability and adoption of the citizen participation plan* *A. Encouragement of citizen participation - citizens are encouraged to participate in the development of the Consolidated Plan, any substantial amendments to the Consolidated Plan, and the performance report. These requirements are designed especially to encourage participation by low-and moderate-income persons, particularly those living in slum and blighted areas and in areas where CDBG funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods. Appropriate actions will be taken to encourage and accommodate the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities. Statewide and regional institutions and other organizations that are involved with or affected by the programs or activities covered by the Consolidated Plan (including businesses, developers, and community and faith-based organizations) will be involved, or encouraged to participate, in the process of developing and implementing the Consolidated Plan. Alternative public involvement techniques that encourage a shared vision of change for the community and the review of program performance, e.g., use of focus groups, use of Internet, etc will be explored.* *B. Citizen and local government comment on the citizen participation plan and amendments - reasonable opportunity to comment on the original citizen participation plan and on substantial amendments to the citizen*	

participation plan will be provided to citizens and units of general local government. The citizen participation plan and any amendments are made public through each posting of the five year Consolidated Plan and annual updates as well as the CAPER report. The citizen participation plan will be in a format accessible to persons with disabilities, upon request. *II. Development of the Consolidated Plan.* *A. Before the Consolidated Plan is adopted, the state makes available to citizens, public agencies, and other interested parties information that includes the amount of assistance the state expects to receive and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income and the plans to minimize displacement of persons and to assist any persons displaced. The state makes this information available on the state public hearing and the DHCD websites two weeks before the plan is adopted.* *B. The state will publish the proposed Consolidated Plan in a manner that affords citizens, units of general local governments, public agencies, and other interested parties a reasonable opportunity to examine its contents and to submit comments. DHCD publishes the Consolidated Plan on its website and provides copies to the state library as well as making it available in other formats upon request. In addition, the State provides a reasonable number of free copies of the plan to citizens and groups upon request.* *C. There will be at least one public hearing on housing and community development needs before the proposed Consolidated Plan is published for comment.* *1. Hearings on housing and community development needs will take place on a region*	

by region basis and will provide at least 7-14 days notice in locally circulated newspapers prior to hearings. *2. The hearings are held regionally for convenience to the potential and actual beneficiaries, and contact information is provided in the announcement so that persons with disabilities may acquire accommodations in accordance with the Americans with Disabilities Act.* *3. An interpreter will be provided in public hearings where non-English speaking residents are reasonably expected to participate.* *D. There will be a period of 30 days, to receive comments from citizens and units of government on the Consolidated Plan.* *E. In preparing the final Consolidated Plan, the state considers any comments or views of citizens and units of local government received in writing or orally presented at the public hearings. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, is attached to the final Consolidated Plan.* *III. Amendments and Annual Updates* *A. Criteria for amendment to Consolidated Plan.* *A substantial amendment to the Consolidated Plan will be defined as a significant modification to the scope of work or a change in the method of distribution or funding.* *B. Reasonable notice and an opportunity to comment on substantial amendments will be provided to citizens and units of general local government. All amendments will undergo the same process as is required for the Consolidated Plan for notice and comment.* *C. The state considers any comments or views*	

of citizens and units of general local government received in writing, or orally at public hearings, if any, in preparing the substantial amendment or updates to the Consolidated Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall is attached to the substantial amendment or updates of the Consolidated Plan. *IV. Performance Reports* *A. Citizens will be provided with reasonable notice and an opportunity to comment on performance reports. Notice and comment will be received in the same manner as the Consolidated Plan for performance reports. There will be a period of at least 15 days, to receive comments from citizens and units of general local government on the Consolidated Plan performance reports.* *B. The state will consider any comments or views of citizens received in writing, or orally at public hearings in preparing the performance report. A summary of these comments or views shall be attached to the performance report.* *V. Citizen participation requirements for local governments.* *Units of general local government receiving CDBG funds from the state will comply with citizen participation requirements as described in the State CDBG Application Guide and Utah's Open Public Meeting Laws.* *VI. Availability to the public.* *The Consolidated Plan as adopted, substantial amendments, updates, and the performance report will be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request. These documents are available on the*	

state website or by request to the state Division of Housing and Community Development. *VII. Access to records.* *The state will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the state's Consolidated Plan and the state's use of assistance under the programs covered by this part during the preceding five years.* *VIII Complaints.* *The citizen participation plan will describe the state's appropriate and practicable procedures to handle complaints from citizens related to the Consolidated Plan, amendments, updates, and performance reports.* *The State will provide a timely, substantive written response to every written citizen complaint, within an established period of time (within 15 working days, where practicable).* *<u>Utah Division of Housing and Community Development's LANGUAGE ASSISTANCE PLAN (LAP) FOR ADDRESSING LIMITED ENGLISH PROFICIENCY</u>* *A. POLICY STATEMENT* *It is the policy of the Division of Housing and Community Development (HCD) to take reasonable steps to provide meaningful access to its programs and activities for persons with Limited English Proficiency (LEP). The policy is to ensure that staff will communicate effectively with LEP individuals, and that LEP individuals will have access to important programs and information. HCD is committed to complying with federal requirements in providing free meaningful access to its programs and activities for its LEP clients.* *B. WHO IS LIMITED ENGLISH PROFICIENT (LEP)*	

LEP individuals do not speak English as their primary language and have a limited ability to read, write, speak, or understand English. • *Many LEP persons are in the process of learning English and may read, write, speak, and/or understand some English, but not proficiently.* • *LEP status may be context-specific – an individual may have sufficient English language skills to communicate basic information (name, address etc.) but may not have sufficient skills to communicate detailed information (e.g., program requirements, policies and procedures) in English.* *C. BACKGROUND* • *Federal law prohibits discrimination based on national origin. National origin discrimination includes discrimination based on a person's inability to speak, read, write or understand English. Recipients of federal funds must provide meaningful access to LEP persons in federal and federally assisted programs and activities.* • *On August 11, 2000, Executive Order 13166, titled, "Improving Access to Services by Persons with Limited English Proficiency," was issued. Executive Order 13166 requires federal agencies to assess and address the needs of otherwise eligible persons seeking access to federally conducted programs and activities who, due to LEP cannot fully and equally participate in or benefit from those programs and activities. Section 2 of the Executive Order 13166 directs each federal department or agency "to prepare a plan to improve access to…federally conducted programs and activities by eligible LEP persons…."* *D. FRAMEWORK FOR DECIDING WHEN LANGUAGE SERVICES ARE NEEDED*	

HCD will take the following steps to ensure meaningful access to its programs, services and activities for LEP individuals. *1. Maintain a list of agency staff, including Ethnic Affairs who share office space and administrative staff with DHCD, that have the ability to translate another language into English.* *2. The list will be accessible to the receptionists when callers or visitors are communicating in a non-English language.* *3. The department website has a link to translate information and forms on the Division Website into 33 different languages.* *E. DEFINITIONS* • *Primary Language – The language in which an individual is most effectively able to communicate.* • *Interpretation – The act of listening to a communication in one language and orally converting it into another language, while retaining the same meaning. Interpreting is a sophisticated skill needing practice and training, and should not be confused with simple bilingualism. Even the most proficient bilingual individuals may require additional training and instruction prior to serving as interpreters. Qualified interpreters are generally required to have undergone rigorous and specialized training.* • *Translation – The replacement of written text from one language into an equivalent written text in another language. Translation also requires special knowledge and skills.* • *Bilingual – The ability to speak two languages fluently and to communicate directly and accurately in both English and another language.* • *Direct Communication – Monolingual communication in a language other than English between a qualified bilingual employee or other bilingual person and an LEP*	

individual (e.g., Spanish to Spanish). *F. LEP MONITORING AND UPDATING THE LAP* *Monitoring and implementation of the Plan will be conducted by the managers in each service area. The Plan will be reviewed annually by the LEP Coordinator to determine whether updates are needed. The LEP Coordinator will:* • *Coordinate identification of language service needs and strategies so that staff will have access to appropriate language services in their interactions with clients.* • *Ensure the agency's compliance with the LEP Policy and Plan.* • *Identify training needs for staff on implementation of LEP Plan and the use of language service providers. Provide annual training on LEP Policy and Plan, including training to new employees as part of the orientation process.* • *Establish a bilingual staff list. Review qualifications of bilingual staff to ensure quality and skill level. Ensure all employees receive a copy of this list and know the procedure for contacting and/or scheduling contracted interpreters.* • *Conduct an annual review to assess changes, if any, in:* o *The availability of resources, including technological advances and sources of additional resources, and the costs imposed;* o *Whether existing LAP is meeting the needs of LEP persons;* o *Whether staff understands the LAP and how to implement it; and* o *Whether identified sources for assistance are still available.* *G. LANGUAGE ASSISTANCE OPTIONS* *HCD will offer the opportunity for meaningful access to LEP clients. If a client asks for*	

language assistance, or if staff identifies a client who needs assistance, HCD will make reasonable efforts to provide free language assistance. *The following options are used for providing language services:* *I. Oral Interpretation Services (Staff/In-House Services) - quality oral interpretation services will be provided to all LEP persons in some form. Depending on the circumstances, reasonable oral interpretation assistance might be offered through a bilingual employee or family member. It is the LEP person's decision whether to use family members or friends as interpreters. Extra caution will be exercised when the LEP person chooses to use a minor. HCD will ensure that the LEP person's choice is voluntary, that the LEP person is aware of the possible problems if the preferred interpreter is a minor child, and that the LEP person knows that HCD will provide a competent interpreter at no cost to the LEP person. No adverse action would be taken using a child (anyone under the age of 18) as an interpreter.* *II. Written Interpretation Services (Vital Forms and Documents) - vital documents/written materials and most commonly used forms will be translated into the identified languages.* *H. PERSONNEL/HUMAN RESOURCE PLANNING* *The Language Assistance Plan for management includes planning on personnel and human resource matters, such as:* • *Consideration of language needs and inclusion of second language skills in recruitment, hiring, and promotion plans and criteria.* • *Providing training opportunities to improve existing language skills for staff.*	

• *Informing new employees of HCD's duty to offer free language assistance in compliance with Federal requirements.* *I. TRAINING* *Training is critical so that staff understands how to access language services, and so that those staff involved in actually providing the language services are competent to do so. Initial and periodic training will be conducted for staff coming into contact with LEP persons. Training will include:* • *An in-depth discussion of the plan.* • *How to respond to LEP callers.* • *How to respond to written communications from LEP clients.* • *How to respond to LEP clients who contact the Authority in person.* • *Staff and outside vendors available for interpretation at appointments.* • *The location of translated documents.* *J. MONITORING* *The agency will monitor LEP compliance by:* • *Setting forth clear expectations for staff and managers regarding language assistance.* • *Implementing a system to monitor effectiveness of the Plan and its implementation.* • *Seeking feedback on the quality and effectiveness of the language service resources available and utilization by staff* • *Reviewing programs and the language resources available at least once per year (or as appropriate), and making adjustments as necessary and appropriate to ensure meaningful access and to reflect improved approaches to providing language access.* *K. LANGUAGE ASSISTANCE MEASURES AND INTERNAL CONTROLS* *The following procedures will be used to provide language assistance:*	

1. Telephone communication: Callers who are limited English proficient often have an English speaking person present when they call: • *Ask that English speaking person to identify the language need of the caller.* • *The Receptionist will contact a person on staff to to transfer the caller to translate.* *2. Written communication: Contact a supervisor who will arrange for translation of the document.* *3. Walk-ins and individuals at the front desk that need translation services: Identify the language service required; contact a staff person who is able to translate.*	

Other Agencies Consulted

List other public/private entities that were consulted in developing this plan.

Consolidated Plan Narrative	***CAPER Narrative***
The Utah Division of Housing and Community Development is an active partner and regular participant in various forums including the Utah Housing Coalition, National Association of Redevelopment and Housing Officials (Utah Chapter), State Coordinating Agency Long Range Planning Committee (Salt Lake County), statewide Homeless Coordinating Council, local homeless coordinating council, Utah Indian Housing Council, state-wide committee for Transition to Adult Living (TAL), Utah Apartments Association, and Housing Education Coalition of Utah. This participation allows DHCD to discuss programs, funding, needs, and priorities with other public and private organizations as related to the Utah Consolidated Plan 2010-2015 as well as annual updates and annual action plans. *DHCD also holds informal discussions with*	

housing developers, housing authorities, local government officials, social service providers, community action agencies, and other state agencies throughout the year. The prime partners in the development of this plan are the Associations of Government which geographically represent all of Utah. The planners employed by each AOG are expected to best assess community needs in order to direct the development of this plan and future updates. The AOG planners were consulted in development of the state-wide plan on a quarterly basis throughout 2009. Copies of each AOG's assessment of needs, priorities, proposals funding levels, and metrics are included on the other seven tabs for this plan and are tabulated within the state tables. Finally, DHCD receives direction and feedback on needs, funding, and programs from the Olene Walker Housing Loan Fund Board which is appointed by the Governor and from the CDBG Policy Committee which is also appointed by the Governor.	

Table 1- Housing, Homeless and Special Needs Assessment (Required for Consolidated Plan)

Using the local Affordable Housing Plan(s) and other available data, please complete the HUD-required Table I in the attached EXCEL-based document. That EXCEL-based document automatically populates the table below.

Once you are within the EXCEL-based document, HUD information for completing Table 1 is available by clicking on the box labeled "Table 1 Housing, Homeless and Special Needs Assessment". Software for projecting affordable housing needs is available through the Division of Housing and Community Development at: http://housing.utah.gov/owhlf/reports.html Information on homeless populations can be derived from local homeless coordinating committee's projections and data.

Table 1 Housing, Homeless and Special Needs Assessment (Required for Consolidated Plan)							
A. Table I - Housing Needs							
Household Type	**Elderly Renter** (1&2 person household, either person 62 years old or older)	**Small** (2-4 members)	**Large** (5+ members)	**All Other**	**Total Renter**	**Owner**	**Total Households**
0 –30% of MFI	**2999**	**5962**	**1878**	**4916**	**14534**	**13585**	**28119**
%Any housing problem	51.69	81.53	90.19	63.95	72.03	70.76	71.36
%Cost burden > 30%	50.35	79.19	76.25	61.36	68.11	63.91	65.78
%Cost Burden > 50%	33.51	59.56	49.08	44.36	49.19	43.24	46.76
31 - 50% of MFI	**2408**	**6038**	**1991**	**3205**	**11792**	**16005**	**27797**
%Any housing problem	32.23	64.39	73.24	52.26	58.64	47.30	52.86
%Cost burden > 30%	31.64	59.54	45.32	45.75	50.51	42.62	46.45
%Cost Burden > 50%	13.10	10.64	16.36	13.75	12.04	23.30	17.89
51 - 80% of MFI	**2803**	**8983**	**3973**	**4698**	**17141**	**33101**	**50242**
%Any housing problem	13.33	23.03	47.81	29.76	27.44	39.35	34.50
%Cost burden > 30%	12.20	13.82	16.35	24.04	15.66	35.00	27.02
%Cost Burden > 50%	4.11	0.93	1.59	3.30	1.80	8.36	5.59
B. Table I - Homeless Continuum of Care: Housing Gap Analysis Chart							
		Current Inventory	**Under Development**	**Unmet Need/Gap**			
Individuals							
Beds	Emergency						

	Shelter	366	32	325			
	Transitional Housing	454	12	214			
	Permanent Supportive Housing	426	-	339			
	Total	1,246	44	878			
Persons in Families With Children							
Beds	Emergency Shelter	1,085	-	360			
	Transitional Housing	401	-	418			
	Permanent Supportive Housing	10	-	264			
	Total	1,496	-	1,042			
C. Table I - Continuum of Care: Homeless Population and Subpopulations Chart							
Part 1: Homeless Population	**Sheltered**		**Unsheltered**	**Total**			
	Emergency	**Transitional**					
Number of Families with Children (Family Households)	89	115	40	244			
1. Number of Persons in Families with children	1,281	349	66	1,696			
2. Number of Single Individuals and Persons in Households without Children	745	215	289	1,249			
(Add lines Numbered 1 & 2 Total Persons)	2,026	564	355	2,945			
Part 2: Homeless Subpopulation	**Sheltered**		**Unsheltered**	**Total**			
	Emergency	**Transitional**					

a. Chronically Homeless	548	4	346	898			
b. Seriously Mentally Ill	151	-	18	169			
c. Chronic Substance Abuse	182	1	19	202			
d. Veterans	66	1	5	72			
e. Persons with HIV/AIDS	3	-	-	3			
f. Victims of Domestic Violence	179	47	16	242			
g. Unaccompanied Youth (Under 18)	8	1	22	31			
D. Table 1 - Housing, Homeless and Special Needs							
Special Needs (Non-Homeless) Subpopulations	**Unmet Need (renters and owners)**						
1. Elderly	4,617						
2. Frail Elderly	1,725						
3. Severe Mental Illness	288						
4. Developmentally Disabled	616						
5. Physically Disabled	1,545						
6. Persons w/Alcohol/Other Drug Addictions	10,248						
7. Persons w/HIV/AIDS	10						
8. Victims of Domestic Violence	158						
9. Other	5						

Table 2A – State Priority Housing Activities/Investment Plan

Using the data from Table 1 and local housing plans please prioritize the populations for activities and allocation of funds in the attached EXCEL-based document. That EXCEL-based document automatically populates the table below.

Once you are within the EXCEL-based document, HUD information for completing this table is available by clicking on the box labeled "Table 2A".

Table 2A (OPTIONAL TABLE) **State Priority Housing Activities/Investment Plan**			
PART 2 PRIORITY HOUSING NEEDS		**Priority Level** **Indicate High (3), Medium (2), Low (1)**	
Household Size	**Small (5 persons or less with 2 related persons)**	0-30%	3
		31-50%	3
		51-80%	2
	Large (5 persons or larger with at least 2 related persons)	0-30%	2
		31-50%	2
		51-80%	2
Rental Units	**Elderly**	0-30%	3
		31-50%	2
		51-80%	2
	All Other	0-30%	2
		31-50%	2
		51-80%	2
Owner Occupied Units		0-30%	2
		31-50%	2
		51-80%	2
PART 2 PRIORITY SPECIAL NEEDS		**Priority Level** **Indicate High (3), Medium (2), Low (1)**	
Elderly		2	
Frail Elderly		2	
Severe Mental Illness		2	
Developmentally Disabled		2	
Physically Disabled		2	

Persons w/ Alcohol/Other Drug Addictions	2
Persons w/HIV/AIDS	1
Victims of Domestic Violence	2
Youth Aging Out of Foster Care	2
Other:	1

PART 3 PRIORITY	**Priority Level**
HOUSING ACTIVITIES[1]	**Indicate High (3), Medium (2), Low (1)**
CDBG Priorities	
1. Acquisition of existing rental units	1
2. Production of new rental units	2
3. Rehabilitation of existing rental units	2
4. Rental assistance	2
5. Acquisition of existing owner units	1
6. Production of new owner units	2

[1]***Housing rehabilitation definitions (per 24 CFR § 91.205 and 24 CFR § 570.3):***

*A "**standard condition**" dwelling unit is a unit which meets HUD Section 8 Housing Quality Standards (HQS) (or local code) with no major defects in the structure and minor maintenance is required. Such a dwelling will generally have the following characteristics: a reliable roof; a sound foundation; adequate and stable floors, walls and ceilings; surfaces and woodwork that are not seriously damaged nor have paint deterioration; sound windows and doors; adequate heating, plumbing, and electrical systems; adequate insulation; adequate water and sewer systems; and not overcrowded (per the local occupancy code). With the exception of emergency rehabilitation, a unit in standard condition is not eligible to receive housing rehabilitation fund from the PJ.*

***Substandard Condition Suitable for Rehabilitation is a** dwelling unit in the PJ's jurisdiction that does not meet "standard condition" per the HUD Housing Quality Standards (HQS) inspection and the State of Utah Residential Building Cod. Such dwelling units are both structurally and financially feasible to rehabilitate. The unit's condition requires at least three major building systems to be replaced (heating system, plumbing, electrical, roofing, or structural/seismic). The unit has other items noted as "General Standards of Items that Fail" per the HQS/other inspection. However, a dwelling unit that is "substandard suitable for rehabilitation" has basic infrastructure (including systems for clean water and sewer) that allows for economically and physically feasible improvements to meet the definition of "standard condition". To be "financially feasible for rehabilitation", a structure's estimated rehabilitation costs must not be more than xx% of the structure's after rehabilitation appraised market value..*

***Substandard Condition Not Suitable for Rehab**: Dwelling units that are in the PJ's jurisdiction in such poor condition and not structurally or financially infeasible to rehabilitate shall not be served. Examples of poor condition include units with cracked foundation in multiple places, heavy structural damage through expansive soils, chemical other toxic contamination in or adjacent to the structure, and fire/water damage posing significant health issues.*

***Substandard Condition Suitable for Emergency Rehabilitation**: The type of work eligible under the Homeowner Emergency Rehabilitation Program is for emergency correction of livability problems. This includes new furnaces, repairs to water or sewer connections, roof repairs, and other financially feasible maintenance work critical to habitability/livability of the unit.*

7. Rehabilitation of existing owner units	2	
8. Homeownership assistance	2	
HOME Priorities		
1. Acquisition of existing rental units	1	
2. Production of new rental units	2	
3. Rehabilitation of existing rental units	2	
4. Rental assistance	2	
5. Acquisition of existing owner units	2	
6. Production of new owner units	2	
7. Rehabilitation of existing owner units	3	
8. Homeownership assistance	2	
PART 3 PRIORITY	**Priority Level**	
HOUSING ACTIVITIES (Continued)	**Indicate High (3), Medium (2), Low (1)**	
HOPWA Priorities		
1. Rental assistance	1	
2. Short term rent/mortgage utility payments	1	
3. Facility based housing development	1	
4. Facility based housing operations	1	
5. Supportive services	1	
6. Other	1	

Other Populations		
1. Unaccompanied youth	2	
2. Other discharged individuals (incarceration, etc.)	2	
3. Homeless populations	2	
Other Community Needs		
1. Community Facilities (libraries, community halls, etc.)	2	
2. Culinary Water	3	
3. Planning	3	
4. Economic Development	2	
5. Removal of Barriers for the Disabled	2	
6. Sewer Systems	3	
7. Transportation	2	
8. Streets	2	
9. Parks and Recreation:	1	
10. Public Safety	2	
11. Public Services	2	
12. Other:	3	
13. Other:	2	

Table 2C – Summary of Specific Objectives (Actions)

Using the data from Tables I and 2A along with local housing plans, please list specific measurable objectives and funding allocations in the attached EXCEL-based spreadsheet that help meet the prioritized needs from Table 2A. Agencies should include an expected number of measureable units to be accomplished for each of the five years. Once within the EXCEL-based document, HUD information for completing this table is available by clicking on the box labeled "Table 2C Summary of Specific Objectives". Overall objectives listed in the EXCEL document have been prepared by DHCD to align with the HUD Strategic goals and Utah's "Analysis of Impediments" (AI). The EXCEL-based document automatically populates the table below. Future projections can be revised each year during preparation of the annual update and action plans. Actual numbers accomplished are assembled by the state for the annual CAPER.

Table 2C Summary of Specific Objectives (Actions)										For Annual CAP
Specific Obj. #	Outcome/Objective Specific Objectives (Actions)	HUD 2010-15 Strategic Objective met with proposed action	Analysis of Impediment met with proposed action	Indicate High (3), Medium (2), Low (1)	Sources of Funds (CDBG, HOME, HOPWA, ESG, other)	Proposed Allocation of HUD $	Performance Indicators	State Fiscal Year	Expected Number	Actual Number (for State use only)
DH-1	**Availability of Affordable Housing**									
DH-1.1	Provide fully-accessible housing	Goal #3	#1 - Lack of Afford. Housing	2	HOME & State Match	348,983	Households assisted (new SF and MF units also serving persons having physical disabilities)	2010	93	
				2	HOME & State Match	506,000		2011	40	
				3	HOME & State Match	506,000		2012	40	
				3	HOME & State Match	506,000		2013	40	
				3	HOME & State Match	506,000		2014	40	
							MULTI-YEAR GOAL			
DH-1.2	Provide housing for households with special needs (mental illness, seniors, etc.)	Goal #3	#1 - Lack of Afford. Housing	3	HOME & State Match	2,032,500	Number of new units funded (not otherwise included)	2010	58	
				2	HOME & State Match	1,264,000		2011	100	
				3	HOME & State Match	1,264,000		2012	100	
				3	HOME & State Match	1,264,000		2013	100	
				3	HOME & State Match	1,264,000		2014	100	
							MULTI-YEAR GOAL			
DH-2	**Affordability of Decent Housing**									
DH-2.1	Develop more affordable rental housing	Goal #2	#1 - Lack of Afford. Housing & #2 Incongurity of Wages/Rents	3	HOME & State Match	1,980,000	Households assisted (new units - not otherwise included)	2010	110	
				3	HOME & State Match	2,530,000		2011	200	
				3	HOME & State Match	2,530,000		2012	200	
				3	HOME & State Match	2,530,000		2013	200	
				3	HOME & State Match	2,530,000		2014	200	
							MULTI-YEAR GOAL			

DH-2.2	Provide housing solutions to end chronic homelessness	Goal #3	#1 - Lack of Afford. Housing	2	HOME & State Match	inc. in above	Number of new units funded (not otherwise included)	2010	63	
				2	HOME & State Match	1,580,000		2011	125	
				3	HOME & State Match	1,580,000		2012	125	
				3	HOME & State Match	1,580,000		2013	125	
				3	HOME & State Match	1,580,000		2014	125	
							MULTI-YEAR GOAL			
DH-2.3	Increase homeownership opportunities for low income families	Goals #1 & 3	#1 - Lack of Afford. Housing	3	CDBG/HOME & State Match	1,605,596	Number of new homes created (DPA, Self Help, etc.)	2010	125	
				3	CDBG/HOME & State Match	772,000		2011	120	
				3	CDBG/HOME & State Match	772,000		2012	120	
				3	CDBG/HOME & State Match	772,000		2013	120	
				3	CDBG/HOME & State Match	772,000		2014	120	
							MULTI-YEAR GOAL			
DH-2.4	Provide housing for households with HIV/AIDS (through Tenant Based Rental Assistance; Facility-based Housing Assistance; and Short-term Rent, Mortgage and Utility Assistance).	Goals #2,3, and 4	#1 Lack of Afford. Housing	1	HOPWA	117,707	# of households served with rental assistance	2010	80	
				2	HOPWA	114,000		2011	50	
				2	HOPWA	114,000		2012	50	
				2	HOPWA	114,000		2013	50	
				2	HOPWA	114,000		2014	50	
							MULTI-YEAR GOAL			
DH-2.5	Increase capability of local agencies to plan and develop housing projects	Goals #1,2,3,4 and 5	#1 Lack of Afford. Housing & #3 Community Nimbyism	2	CDBG/HOME	104,000	Number of local agencies attending workshops and formal trainings	2010	3	
				3	CDBG/HOME	25,000		2011	18	
				3	CDBG/HOME	25,000		2012	18	
				3	CDBG/HOME	25,000		2013	18	
				3	CDBG/HOME	25,000		2014	18	
							MULTI-YEAR GOAL			
DH-2.6	Prevent homelessness through rental assistance	Goal #3	#1 Lack of Afford. Housing	3	HOME & State	new goal '11	# of households served with TBRA rental assistance	2010	new goal '11	
				3	HOME & State	120,000		2011	20	
				3	HOME & State	120,000		2012	20	
				3	HOME & State	120,000		2013	20	
				3	HOME & State	120,000		2014	20	
							MULTI-YEAR GOAL			
DH-3	**Sustainability of Decent Housing**									
DH-3.1	Preserve more affordable housing	Goals #1,2,3,4 and 5	#1 - Lack of Afford. Housing & #2 Incongurity of Wages/Rents	3	CDBG/HOME &	1,305,000	Households assisted (MF and SF units preserved and rehabilitated including lead	2010	162	
				3	CDBG/HOME &	2,476,392		2011	280	
				3	CDBG/HOME &	2,476,392		2012	280	
				3	CDBG/HOME &	2,476,392		2013	280	
				3	CDBG/HOME &	2,476,392		2014	280	
							MULTI-YEAR GOAL			

SL-1	**Availability/Accessibility of Suitable Living**									
SL-1.1	Provide more and upgraded public facilities primarily benefiting low-income citizens	Goal #4	NA	3	CDBG	1,322,185	(LMI) persons served through increased number of facilities and services	2010	7,573	
				3	CDBG	567,000		2011	4,100	
				3	CDBG	500,000		2012	3,500	
				3	CDBG	500,000		2013	3,500	
				3	CDBG	500,000		2014	3,500	
							MULTI-YEAR GOAL			
SL-2	**Sustainability of Suitable Living Environment**									
SL-2.1	Provide safe and clean water, primarily to low income persons, to improve the sustainability of the community.	Goals #3 and 4	#1 Lack of Afford. Housing	3	CDBG	1,200,000	(LMI) persons being served	2010	8,600	
				3	CDBG	352,000		2011	2,200	
				3	CDBG	300,000		2012	2,000	
				3	CDBG	300,000		2013	2,000	
				3	CDBG	300,000		2014	2,000	
							MULTI-YEAR GOAL			
SL-2.2	Provide warm and safe shelter for the homeless	Goal #3	#1 Lack of Afford. Housing & #3 Community Nimbyism	2	ESG and match	70,000	Shelter nights	2010	45,000	
				3	ESG and match	50,000		2011	45,000	
				3	ESG and match	200,000		2012	45,000	
				3	ESG and match	80,000		2013	45,000	
				3	ESG and match	80,000		2014	45,000	
							MULTI-YEAR GOAL			
SL-2.3	Remove barriers to disabled persons utilizing public facilities	Goal #4	NA	2	CDBG	300,000	Disabled persons being served	2010	3,200	
				3	CDBG	-		2011	-	
				3	CDBG	100,000		2012	100	
				3	CDBG	100,000		2013	100	
				3	CDBG	100,000		2014	100	
							MULTI-YEAR GOAL			
SL-2.4	Provide other public infrastructure improvements	Goal #4		2	CDBG	1,170,000	(LMI) persons being served	2010	23,525	
				2	CDBG	600,000		2011	4,600	
				2	CDBG	500,000		2012	4,000	
				2	CDBG	500,000		2013	4,000	
				2	CDBG	500,000		2014	4,000	
							MULTI-YEAR GOAL			
EO-1	**Availability/Accessibility of Economic**									
EO-1.1	Create economic opportunity	Goal #1	NA	3	CDBG/HOME	250,000	Number of jobs created (includes OWHLF total production)	2010	1,034	
				2	CDBG/HOME	100,000		2011	1,250	
				2	CDBG/HOME	100,000		2012	1,250	
				2	CDBG/HOME	100,000		2013	1,250	
				2	CDBG/HOME	100,000		2014	1,250	
							MULTI-YEAR GOAL			
EO-1.2	Support services to increase self sufficiency for the homeless	Goal #3	#1 Lack of Afford. Housing & #3 Community Nimbyism	2	ESG and match	858,808	Hours of case management	2010	29,252	
				3	ESG and match	180,750		2011	15,000	
				3	ESG and match	180,750		2012	15,000	
				3	ESG and match	180,750		2013	15,000	
				3	ESG and match	180,750		2014	15,000	
							MULTI-YEAR GOAL			

EO-2	**Affordability Economic Opportunity**									
EO-2.1	Increase available affordable units of workforce housing	Goals #1,2,3 and 4	#2 Incongruity Wages/Rents	3	HOME	inc. in above	Number of units created - also see DH 2.1	2010	22	
				3	HOME	inc. in above		2011	65	
				3	HOME	inc. in above		2012	65	
				3	HOME	inc. in above		2013	65	
				3	HOME	inc. in above		2014	65	
							MULTI-YEAR GOAL			
EO-3	**Sustainability of Economic Opportunity**									
EO3.1	Insure that projects support LMI populations	Goal #4	all	3	HOME	inc. in above	Average AMI served through projects	2010	0.40	
				3	HOME	inc. in above		2011	0.40	
				2	HOME	inc. in above		2012	0.40	
				2	HOME	inc. in above		2013	0.40	
				2	HOME	inc. in above		2014	0.40	
							MULTI-YEAR GOAL			
CR-1	**Community Revitalization**									
CR-1.1	Plan for better communities and utilization of funds	Goals #4 and 5	all	3	CDBG	200,000	Number of LMI persons benefiting	2010	5,275	
				3	CDBG	-		2011	-	
				3	CDBG	100,000		2012	1,000	
				3	CDBG	100,000		2013	1,000	
				3	CDBG	100,000		2014	1,000	
							MULTI-YEAR GOAL			

Narrative 1 - Lead Based Paint

Estimate the number of housing units that are occupied by extremely low, low, and moderate-income residents that contain lead based paint hazards, as defined in section 1004 of the Residential Lead Based Paint Hazard Reduction Act of 1992. Describe how lead issues will be mitigated in structures receiving HUD funds for rehabilitation?

Consolidated Plan Narrative	***CAPER Narrative***
The State of Utah has estimated that there are 75,000 homes in the non-entitlement areas that were constructed prior to 1978. Of these homes, an estimated 20,000 are most likely to have lead-based paint somewhere in the home. And it is expected that 12,000 of these homes are occupied by low or moderate-income persons. As a State, Utah has one of the lowest rates in the country for lead poisoning for children under the age of 6 years – only 1%. *Housing rehabilitation programs are carried out by 5 of the 7 regional Associations of Government organizations. However, lead-based paint reduction is not the primary focus of these housing rehab programs. As lead-based paint is encountered in homes targeted for rehab with HUD dollars, it is mitigated by following HUD's lead-based paint regulations. All pre-1978 multifamily and single family units that are funded with HUD dollars are required to meet all HUD requirements for testing and mitigation of lead-based paint. In addition, EPA's new Lead Renovation, Repair and Painting (RRP) rule took effect April 22, 2010. All contractors performing activities that disturb more than six square feet of surface area in homes, child care facilities, schools or other public and commercial facilities built before 1978 must be certified and must follow specific work practices to prevent lead contamination. Utah is making concerted efforts to insure that contractors have completed the new training.* *Housing replacement has become more common in the rural areas where rehabilitation of older manufactured homes is not cost effective. This practice will further reduce the number of pre-1978 homes in the State. The challenge for the program managers continues to be 1) limited funding 2) local staff turnover 3) lack of trained contractors in the rural areas and 4) a large geographic area (80,000 square miles) to cover.*	

The urban areas of Salt Lake City and Salt Lake County operate very successful lead hazard reduction/housing rehab programs. This is due in part to the relatively small urban geographic they serve. Federal budget cuts will limit the number of homes that can be served. *We encourage partnerships between the Weatherization, CDBG and HOME programs so that trained staff is available in each of the 7 regions to test the pre-1978 homes of low income persons. However, the proposed massive budget cuts to the CDBG program threaten to eliminate our housing rehab programs. However, we will continue to strive to raise the awareness of the issue of lead-based paint and lead poisoning in the State of Utah.*	

Narrative 2 - Market Conditions

Describe the significant characteristics of the housing market in terms of the supply, demand, condition, and the cost of housing.[2]

Consolidated Plan Narrative	***CAPER Narrative***
The local consolidated plans report a marked instability in their housing markets which parallels trends in the U.S. housing industry. Although market swings in Utah are less pronounced than in neighboring Arizona, Nevada, and California, Utah communities report the higher rates of foreclosures, the need for affordable rental units, some correction in housing costs (for homeownership), lingering issues with high land costs, and disparity between wages and affordable rents. *DHCD has maintained a vision for affordable housing that includes the production of safe, decent, and affordable housing for low-income citizens; development of new partnerships to leverage Olene Walker Housing Loan Fund (OWHLF) dollars; and support for the 10 year plan to end chronic homelessness. According to the Governor's Office of Planning and Budget, the number of Utah households will increase by almost 29,000 within the next year. Of these households, approximately 5,100 will be low to moderate income renters and 3,500 low to moderate income home owners, for a total of 8,600 lower income households valued at $2.3 billion and another $1.4 billion per year for approximately 14,000 units needing rehabilitation. This is to help keep up with population growth. For the lowest income population alone, a December 2008 report by the Bureau of Economic and Business Research at the University of Utah estimates a gap of 36,250 in cumulative total demand verses supply of affordable housing units. The local consolidated plans also describe the shortage of affordable units in most areas of Utah.*	

[2] *If a state intends to use HOME funds for tenant based assistance, it must specify local market conditions that led to the choice of that option.*

Utah's foreclosure rates are also climbing, and all indicators suggest that the housing slump has gotten worse from last year. The rate of reduction in home prices has lessened during 2010 with a 3.0% reduction state-wide compared to a 4.7% reduction in 2009 and 6.9% for 2008. Yet, average home purchase prices still remain above reach for many families. According to the Utah Association of Realtors, the average Utah home sold for $193,000 in 2009 compared with $174,900 for 2010. These home prices and tighter credit markets have made it difficult for lower income households to qualify for homeownership. As a result, these households continue to rent, pressuring the overall rental market. *For rental units, affordability issues are also compounded as rents continue to remain high compared to income – this creates a preference for affordable units over market rate units. Area consolidated plans show a need for affordable housing, for workforce housing (for teachers, police, firefighters, nurses, etc.) and for special needs housing that serves disabled populations and seniors. Local consolidated plans also describe a shortage of rent subsidies – a shortage that has become worse with the economic downturn and the growing number of low income households. Waiting lists for rent subsidies range from 6 months to 2 years.* *Last year, the Olene Walker Housing Loan Fund had sufficient funding for 958 multifamily units serving 844 households at 30-60 percent AMI and 114 households at less than 30 percent AMI. Although the total net value of the Olene Walker Housing Loan Fund increased from FY08 to FY09 to $102 million, the total demand for loan and grant products continues to outpace available funds.*	

Narrative 3 - Barriers to Affordable Housing

Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the state. Such policies include tax policy, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment. Also describe the overall assessment of housing in the area served under this Consolidated Plan.

Consolidated Plan Narrative	***CAPER Narrative***
(also see the Analysis of Impediments section) *The 2010 Economy in Utah continues to be weak as the severe economic contraction from prior years continues and unemployment rates show little improvement (a rate of 7.1% in 2010 compared to 7.6% in 2009 and 6.6% for 2008), state and local government revenues continue to decline, and the retail sector remains under pressure as consumers cut spending. Utah's housing construction sector likely reached the bottom of the sharpest decline in history during 2009. A decreased supply of complete, unoccupied homes and declines in mortgage rates were compounded by rising foreclosures, industry consolidation, and further declines in building permits. Hope is seen in the rebound for tax credit pricing to support low income housing projects. Surprisingly, the pricing from 2009 (that approached 68-70 cents) has rebounded to almost 90 cents in early 2011.* *The credit crunch has clamped down on financing for affordable housing units, just as foreclosures are rising and stricter lending standards are making it harder for Utah lower income households to qualify for loans. In today's market, It is not uncommon for lending institutions to set high credit standards (over 700) which are impossible for a growing number of households to meet.* *With scarce funding, the state has worked with local and regional government agencies as well as other state and federal agencies to create partnerships that increase affordable housing opportunities statewide. Besides the*	

two significant federal partners (HUD and USDA Rural Development), DHCD continues to partner with the Utah Housing Corporation which administers low income tax credits, Utah Office of Education in tracking EDA and RDA funds set-aside for affordable housing, Utah Division of State History which administers the historical tax credits, the Weatherization Assistance Program (WAP), the Private Activity Bond Board, and area banks to better access CRA funds. *Additional funding to the State of Utah's Olene Walker Housing Loan Fund (OWHLF) would help meet Utah's affordable housing needs for rental and homeownership opportunities. The average production rate from the OWHLF has averaged 750-800 multifamily units and 100-125 single family units per year over the past five years. Whereas, Utah's need for new affordable units for home ownership has been estimated at almost 3,500 units per year and over 5,100 units of new rental units per year. These numbers backlog over time. Utah's cumulative state-wide backlog for new affordable rental units alone has been estimated at 51,000 units by the National Low Income Housing Coalition. The demand for low to moderate income housing far outpaces the production capacity of the Olene Walker Housing Loan Fund.* *In an effort to stretch OWHLF dollars and take advantage of economies of scale, the OWHLF board finances more multi-family units than single-family homes and provides scoring preference to project that create new units of capacity. Where possible, DHCD continues to leverage participation from other programs and funding sources – with the goal of creating additional units of capacity.* *In addition to the demand for new units, affordability for over 169,000 existing very low-income housing units (AMI < 50%) must be maintained. This includes approximately*	

94,000 rental units. For the lowest income populations, this equates to over 3,000 per year needing rehabilitation for households at less than 30% AMI and almost 3,800 for households at 30-50%. *Utah has approximately 163,000 low income renter households (0 to 80 percent AMI) or one in five of all households. In 2010, household income for low income households (at 50% AMI) in 13 of Utah's 29 counties could not support renting a 1 bedroom unit at fair market rent and could not support renting any 2 or 3 bedroom unit. This cost for rental housing verses income impairs the ability of businesses and government to find and retain a workforce in many communities.* *A statewide survey of Utah's rural low-income housing stock shows an ongoing need for rehabilitation. In parts of southeastern Utah, 34 percent of the homes are considered deteriorated or dilapidated (unlivable) with tribal housing faring less. Under the OWHLF Programs, participants living in these difficult, unsafe or unsanitary conditions are identified and targeted for assistance. Referrals are often received from social service providers, church leaders, and advocates for the poor. Virtually all the owner-occupied single-family homes rehabilitated by OWHLF in FY10 had health and safety issues.* *With declining federal revenue, DHCD's Weatherization Assistance Program has unveiled an innovative pilot program with a local lending institution. The program provides low interest loans to lower income households for weatherization upgrades. The program serves a population between 150-200% of the federal poverty level. The energy upgrades help to maintain affordability and preserve homeownership in owner-occupied homes through lower utility bills while improving occupant comfort and safety.*	

A review of the local consolidated plans and a review market conditions shows the following list of barriers to affordable housing. In allocating HUD funds during 2011-2012, DHCD hopes to address many of these barriers: *• The need for affordable housing units which is compounded by the lack overall capacity in some nonprofit developers, relatively high land costs and construction costs for affordable housing, limited financial resources (tax credits, etc.), and lack of community support (density bonuses, fee waivers, RDA/EDA funding, updated housing plans, etc.)* *• The limited availability of rent subsidies for lowest income households to help offset disparity between wages and rents.* *• Need for consumer education for homebuyers, overall financial management for renters and homeowners, and foreclosure counseling.* *• The need for more units to serve special needs populations (elderly, disabled, etc.)* *• The lack of incentives and programs to facilitate homeownership (DPA, IDA, and homebuyer counseling).* *• Lack of funding to expand rehabilitation programs for existing rental and owner-occupied units* *The result of a state-wide survey conducted by DHCD in 2010 for the 2011 Analysis of Impediments update supports the Utah Consolidated Plan 2010-2015 focus on affordable housing. That survey identifies Utah's top three impediments to Fair Housing: the lack of affordable housing units including units for special needs populations (which affects fair choice), incongruity between wages and rents, and certain community NIMBYism. Impediments observed by the percentage of all survey respondents include:* *1. Lack of affordable housing 73%* *2. Insufficient income 63%*	

3. *Economic downturn 54%* 4. *Incongruity between wages and rents 53%* 5. *Community NIMBY'ism 53%* 6. *Prejudice/attitude 44%* 7. *Lack of education among consumers 33%* 8. *Lack of education among property managers 31%* 9. *City zoning 28%* 10. *Lack of 'good landlord' policies 26%* 11. *Practices involving lending institutions 23%* 12. *Racial discrimination 23%* 13. *Lack of enforcement 21%* 14. *Rural / Urban inequality 18%* 15. *Other 16%*	

Narrative 4 - Analysis of Impediments to Fair Housing

The state is required to conduct an analysis to identify impediments to fair housing choice within the state. The analysis is updated annually. Although HUD does not require the analysis to be submitted as part of the Consolidated Plan, the state submits the analysis and updates with the Consolidated Plan and annual updates. In addition, the state must certify that it will affirmatively further fair housing; which means it will conduct the analysis, take appropriate actions to overcome the effects of any impediments, and maintain records reflecting the analysis and actions in this regard. The AOGs should discuss any local impediments to Fair Housing choice and actions to be taken to minimize those impediments..

Consolidated Plan Narrative	***CAPER Narrative***
Utah's Analysis of Impediments to Fair Housing is attached. The AI was substantially updated in 2011 for this 2011-12 Con Plan update. The updated AI includes the results from a statewide survey conducted to solicit local perceptions and data. Information from the survey shows that the primary impediments to Fair Housing have not changed from 2010. The survey information better identifies geographic areas where impediments may prevail. Please note that staff continues to work with HUD to further update the AI.	

Narrative 5 - Method of Distribution

Provide a description of the methods of distributing funds to local governments and nonprofit organizations to carry out activities or the activities the state will undertake, using funds expected to be received during the program year under the formula allocations (and related program income) and other HUD assistance. Explain how the proposed distribution of funds will address the priority needs and objectives described in the Consolidated Plan.

Consolidated Plan Narrative	***CAPER Narrative***
The HUD funds for HOME activities, CDBG, ESG, and HOPWA are governed by each program's allocation plan. Those plans are created in a public process that provides at least an annual hearing. Hearings are advertised state-wide in accordance with Utah's Open Public Meeting law. Comments are considered in finalizing changes and updates to each allocation plan. In addition, each program's distribution of funds is governed by state Boards with membership appointed by the Governor and other advisory committees which make final decisions for project funding in an open public meeting format. A representative of the Attorney General's Office also provides consultation to DHCD staff and the related Boards on open public meeting laws and processes. *<u>HOME</u>* *To distribute HOME and matching state funds, DHCD conducts four application cycles each year. To coincide with the federal tax credit application process, larger requests for OWHLF multi-family project funding occur each fall. Once applications for projects or programs are received and reviewed per the OWLHF Policies and Procedures,, DHCD recommends a level of funding to the Olene Walker Housing Loan Fund Board necessary to achieve each project's long-term financial viability and to ensure that low-income populations are served throughout the loan term.. The OWHLF utilizes a 15% CHDO set-aside in approving applications for funding assistance. Board meetings are conducted under State of Utah public meeting laws. In making final project approvals, the OWHLF Board will consider:* • *The sources and uses of funds and total financing including loan terms, equity and contributions planned for the project. The OWHLF does not generally provide loans for the refinancing of MF*	

and SF properties. Any instances would follow HUD regulations Sec. 92.206(b). • *Adherence to special set-asides for Community Housing Development Organizations (CHDOs), rural set asides, special needs housing, and grants* • *The equity proceeds expected to be generated by use of the Low Income Housing Tax Credits.* • *The percentage of the housing dollar amount used for hard project costs compared to the cost of intermediaries (e.g. syndication, developer, consulting) and other soft costs.* • *The reasonableness of the developmental, construction, and operational costs of the project and the rate of return of the owner's investment.* • *The support from the local community including the amount of any CDBG grant funds allocated to the project and adherence to the local government's affordable housing plan.* • *The proposed time frame for construction or rehabilitation.* • *Adherence to ENERGY STAR for new construction and rehabilitation.* • *The creation of new housing units/capacity.* *In accordance with 24 CFR 92.205, the Olene Walker Housing Loan Fund's HOME and HOME match funds shall only be allocated as equity investments, interest bearing loans or advances, non-interest-bearing loans or advances, interest subsidies,, deferred payment loans, grants, or loan guarantees (for loans made by lenders not to exceed the thresholds established by 24 CFR 92.205).* *<u>HOPWA</u>* *The HOPWA program is now within the State Community Services Office (SCSO) of DHCD. The selection criteria for awarding of HOPWA funds are based on an analysis of households living with HIV/AIDS and the location of available services. SCSO released a request for proposals from non-profits across the state of Utah. Agencies will be awarded funds upon their demonstrated capacity to achieve the following:*	

• *Increase inventory of affordable units for people living with HIV/AIDS* • *Provide direct client support to obtain or maintain housing and prevent homelessness* • *Identify of resources for people living with HIV/AIDS* *In order to ensure that households being served with HOPWA funds will avoid the threat of homelessness, particular consideration will be given to those agencies that were funded in the previous program year and demonstrated effective use of funds. An HIV/AID Housing Steering Committee (a committee of medical care providers, housing agencies and HOPWA project sponsors) remains in direct contact with people living with HIV/AIDS. Their combined knowledge of the medical and supportive services providers ensures that distribution of funds is equitable among the providers and client needs throughout the state.* *<u>ESG</u>* *For the upcoming fiscal year, DHCD will publish the RFP on February 28, 2011 for the Emergency Shelter Grant (ESG) Award in conjunction with our funding from state sources such as the Pamela Atkinson Homeless Trust Fund and Critical Needs Housing programs. DHCD will hold an application workshop in February 2011 to educate potential applicants regarding the program rules and regulations and the priorities of the allocation committee for the upcoming year. Applications for funds will be due into our office by March 17, 2011. Allocation Committee hearings will be held on April 12 and April 26 of 2011. The committee will hear funding recommendations from staff and make decisions on the allocation of funds. Funds will be awarded by July 1, 2011.* *<u>CDBG</u>* *The Community Development Block Grant (CDBG) funds are utilized consistent with the distribution methodologies developed by the regional planning agencies as approved by the state: Essentially, each of the seven planning regions is given a base amount of $300,000 with the balance being distributed based on a population formula. Utah CDBG policy has long held that program decision-making should be made as close to the applicant*	

level as possible. On this basis, each of the seven regional planning agencies or AOGs has been delegated the responsibility to create and apply a rating and ranking process. *For CDBG, these rating and ranking systems are carefully and completely described in the 2011 CDBG Applications, Procedures and Policies Manual. This book is available on-line (http://community.utah.gov). It is distributed to all potential applicants in a mandatory how-to-apply workshop held each September with approximately 15 workshops throughout the state. Prior to adoption of these systems by local elected officials in each region, they are subject to a public review process. The state has final approval authority over these systems, and they must include the state's mandatory elements (Capacity to Carry Out the Grant, Job Creation, Housing Stock, Affordable Housing Plan , Extent of Poverty, Financial Commitment to Community Development, Project Maturity, Successful participation in quality growth community programs). The rating and ranking systems are evaluated each year and modifications are made. Special efforts continue to eliminate subjectivity and create clearer scoring criteria.* *Unfortunately drastic cuts to the CDBG program may result in necessary changes to the described method of distribution. The nature of such changes can not be determined until the depth of the cuts and their affect in Utah is known.*	

Narrative 6 - Sources of Funds

Identify the resources from private and public sources, including those amounts allocated under HUD formula grant programs and program income, that are reasonably expected to be made available to address the needs identified in the Consolidated Plan. Explain how Federal funds made available will leverage resources from private and non-federal public sources and describe how matching requirements of HUD programs will be satisfied. Where deemed appropriate, indicate publicly owned land or property that may be utilized to carry out the plan.

Consolidated Plan Narrative	***CAPER Narrative***
DHCD matches HOME funds from state dollars appropriated by the Utah Legislature during their annual legislative session. For 2011-12, the legislature provided DHCD with $2,242,900 which includes the HOME match at 25% per home dollar to be spent. DHCD anticipates receiving a 10% reduction in HOME funds for the 2011-12 program year which will require approximately $920,000 in state match funds. It is DHCD's intent to match HOME funds throughout the year as projects are approved. *CDBG expects to receive an entitlement amount from HUD of $4,325,000. The state will take $100,000 plus 2%. Program income is unpredictable in nature but we don't expect any in the upcoming year. There are no outstanding loans (108, RLF, Interim, Float, etc.) or other sources of income anticipated in the upcoming year.* *The following lists all possible coordinating partners who assist DHCD with the Utah Consolidated Plan goals is exhaustive (see summary of primary partners listed below). Those partners noted in* ***bold*** *are consistent funding partners. On average CDBG leverages 1:1 statewide and OWHLF multi-family projects leverage an average of 9:1 with partner agencies and funding sources:* • ***HUD HOME funding*** • ***U.S. Department of Agriculture Rural Development – 515, 502, and 504 programs***	

• *The Rural Business Enterprise Grant Program* • *The Economic Development Agency of the U.S. Department of Commerce,* • ***The U.S. Dept. of Health and Human Services, through the Community Services Block Grant program in ARRA stimulus funds, other ARRA stimulus for Fiscal Year 2010.*** • ***Utah Housing Corporation for low-income housing tax credit funding*** • ***Utah Division of State History for historical tax credit funding.*** • ***Private Activity Bond Board*** • ***The HUD Section 8 program*** • *FEMA* • ***The Permanent Community Impact Board (PCIB)*** • ***Utah Weatherization Assistance Program*** • ***Pamela Atkinson Homeless Prevention Fund*** • *State Homeless Coordinating Council* • *Utah Indian Housing Council* • *Oweesta Corporation (Native America)* • ***Workcamps USA*** • *Utah Office of Indian Affairs* • *U.S. Veterans Administration* • *Road Home* • *Utah Energy Conservation Coalition* • *Utah Department of Workforce Services and Utah Human Services (discharge planning)* • *Utah Housing Coalition* • *NAHRO (Utah Chapter)* • *Utah League of Cities and Towns* • *Clearfield Job Corps Center* • *U.S. Environmental Protection Agency* • *Utah Community Action Partnership* • *Governor's Workforce Housing Initiative* • *Church of Jesus Christ of Latter-day Saints* • *Utah Center for Affordable Housing* • *Envision Utah*	

• ***Area and regional banks per CRA requirements*** • *Utah Labor Commission (Fair Housing Office)* • *Utah Home Counseling Network* • *University of Utah, Bureau of Business and Economic Research* *The OWLHF Board has chosen to allocate OWHLF funds as loans. DHCD tracks loan repayments and other sources of program income. These funds accrue and are rolled annually into the OWLHF budget for allocation by the Board. The total PI for 2011 is estimated at $2.7 million with approximately $2.1 million as HOME and state match PI.* *DHCD will administer the HOME dollars and state match dollars at no more than 5% for each funding source and in accordance with the "Olene Walker Housing Loan Fund Program Policies and Procedures" and all HOME program rules.*	

Narrative 7 – Monitoring

Briefly describe actions that will take place during the next year to monitor housing and community development activities and to ensure long term compliance with program requirements and comprehensive planning requirements. Program requirements include appropriate regulations and statutes of the programs involved, steps being taken to review affordable housing activities, efforts to ensure timeliness of expenditures, on-site inspections to determine compliance with applicable housing codes, and actions to be taken to monitor subrecipients.

Consolidated Plan Narrative	***CAPER Narrative***
CDBG monitors all grantees. The majority (90%) of monitoring done by CDBG staff is via on-site project review. The balance of projects is monitored via a desk audit, specifically for engineering and other non-construction type projects. Grantees are instructed to contact the state when the project is 90% complete. Staff will not pay down the final payment until the project is monitored to staff satisfaction. *HOME projects are monitored at various phases of development and operation. Projects receive an initial site visit after submitting an application to determine any obvious site issues and possible environmental issues. After funding is approved by the OWHLF Board, projects are visited for the preconstruction meeting, at 20% construction, at 50% construction, and final inspection. The visits include verification of compliance to Davis Bacon provisions (as applicable), quality of work, Section 3 requirements, HUD relocation requirements (as applicable), adherence to scope of work, compliance with ENERGY STAR provisions, coordination with the Weatherization Assistance Program, level of funding eligible for draw, posting of Fair Housing logo, verification of site visits from the local municipality's inspectors, and overall workplace safety issues. Throughout the loan period, the projects are reviewed for compliance to Fair Housing, adherence to rent limits, documentation of income verifications, upkeep and quality standards, use of set-aside units for special needs populations, etc. DHCD maintains monitoring files for all*	

phases of each project. An ongoing summary of all monitoring is provided to the OWHLF Board. In addition, projects involving cash flow basis are reviewed and reported to the OWHLF Board. This report is compiled by July of each year. *ESG monitoring is done both by desktop review and on site review. This consists of both fiscal and programmatic reviews of the project to ensure compliance with program rules and regulations, contractual agreements and DHCD policies and procedures. With the implementation of WebGrants, DHCD's grants management system, all reimbursement claims are prescreened for eligibility on program and fiscal requirements to identify any errors before claims are paid. This system also sets up the proper audit trail for subsequent on site reviews of physical documentation. At a minimum all grantees receive regular desktop reviews up to three times per year with on site reviews being done on a risk assessment based on the results of desktop reviews to date.* *HOPWA monitoring is conducted in similar form to ESG monitoring. Desktop reviews will be conducted for agencies as they submit RFF's. The WebGrants system in place allows for efficient use of staff time in review funds requests and allows monitors to become aware of unauthorized activity under the contract and program regulations. SCSO is developing a HOPWA monitoring tool that will be used for on site reviews. It is anticipated that on site reviews will be conducted as deemed necessary by the desk top reviews.*	

Narrative 8 - Specific HOME Submission Requirements

The plan must briefly describe specific HOME actions proposed. Describe the resale or recapture policy that applies for the use of HOME funds.

Consolidated Plan Narrative	***CAPER Narrative***
The use of all HOME funds is governed by the Olene Walker Housing Loan Fund Board, the OWHLF Board approved annual budget, the Program Guidance and Rules, and the DHCD Housing Policies and Procedures. The Program Guidance and Rules governs the application process and staff recommendations for allocation of HOME funds to applicants. The recommendations are reviewed and approved for action by the OWHLF Board at quarterly public meetings. The Policies and Procedures govern staff actions to insure completion and compliance of approved projects with applicable HUD rules and regulations, and DHCD processes. *In establishing its policy regarding affordability periods, DHCD is aware that all housing units that receive HOME funds must comply with a designated affordability period, that each participating jurisdiction may decide how it wants to ensure continued affordability through a resale or recapture provision, and that a PJ must select either the resale or recapture option at the time the HOME assistance is provided.* *Contracts issued by the Division of Housing and Community Development for projects funded by the Olene Walker Housing Loan Fund Board (using HOME funds and state match including program income) include language that requires adherence to recapture provisions per CFR 92.254 (a) (5). The promissory note for loans also restates the recapture requirement and the affordability period. Under the recapture option selected by DHCD, the division will recover all of the HOME assistance or share in net proceeds at the time of the sale by the borrower/grantee. Depending upon each particular project,*	

DHCD will apply one of the basic options for recapture: *1. DHCD can recapture the entire amount of the HOME assistance from the borrower/grantee if the property is sold during the HUD required affordability period,* *2. DHCD can elect to reduce the amount of the HOME assistance to be repaid on a pro-rata basis according to the amount of the affordability period the borrower/grantee has owned and occupied the property,* *3. DHCD and the borrower/grantee can share the net proceeds of the sale of the property based upon the ratio of the HOME assistance provided to the sum of the borrowers/grantee's investment plus the HOME assistance, or* *4. DHCD may allow the borrower/grantee to recover his/her entire investment before any of the HOME assistance is repaid to the DHCD from the remaining net proceeds of the sale of the property.* *In most cases, DHCD will apply option #1 above. There are no restrictions on the price of the property or an income requirement of the buyer. Upon recapture, the affordability period is terminated. DHCD will identify the returned funds as program income and use the returned funds for other HOME eligible activities.* *In cases of foreclosure, DHCD will recapture the amount from net proceeds available from the sale rather than the entire amount of the HOME investment. If there are no net proceeds from the foreclosure, repayment to the HOME account is not required and HOME affordability requirements are considered satisfied* *In some special cases, DHCD may apply resale provisions. Under this provision, the property must remain affordable for the length of the HUD designated affordability period. If the original borrower/grantee sells the*	

property, it has to be sold to an eligible buyer. Depending upon each particular project, DHCD will insure that the resale price must provide the original borrower with a "fair return on investment" including any capital improvements, the resale price must be affordable to the eligible purchaser, and the resale option is typically used in areas where it is difficult to obtain affordable housing such as areas with high home sales prices, rapidly appreciating housing costs, shortage of affordable homes and no land available.	

Narrative 9 - Specific HOPWA Submission Requirement

HIV/AIDS Housing Goals – For areas receiving these funds, identify methods of selecting project sponsors (including providing full access to grass-roots faith-based and other community organizations) and annual goals for the number of households to be provided with housing through activities that provide short-term rent, mortgage and utility assistance payments to prevent homelessness of the individual or family, tenant-based rental assistance; and units provided in housing facilities that are being developed, leased or operated.

Consolidated Plan Narrative	***CAPER Narrative***
The State of Utah Division of Housing and Community Development (DHCD) continues to support existing HOPWA projects and services by distributing funds to agencies that serve clients throughout the State. Applications are reviewed by SCSO staff prepare funding recommendations. Staff possesses specific and detailed knowledge of applicants' ability to comply with grant terms and conditions. Recommendations are reviewed by SCSO director and contracts are issued. *DHCD will only use the authorized administrative cost limit of 3% to manage the program. Project sponsors will be limited to the authorized administrative cost of 7%. This will be monitored when DHCD processes requests for funds.* *DHCD will continue to complete reporting requirements for the Consolidated Annual Performance and Evaluation Report (CAPER). In order to obtain the most accurate data, the State will continue to provide technical assistance to sub-grantees and assist them in making the programs more efficient and effective.* *DHCD is evaluating our approach to the HOPWA program in the State of Utah. Currently, the HOPWA program has been moved to the State Community Services Office for efficiency in contract execution, RFF review, and monitoring. SCSO staff has recruited new applicants and is expanding programs to reach eligible participants. Staff is also exploring the potential for funding*	

dedicated units in a mixed income apartment project. *DHCD has only authorized State HOPWA funds to be used for direct client's housing assistance and is preparing for a construction project with the use of HOPWA funds. No funds will be used for health care costs such as HIV/AIDS medications, except as a last resort.* *Annual goals for the HOPWA program can be seen in table 2C.*	

Narrative 10 - Homeless and other Special Needs (including ESG)

Describe activities to address emergency shelter and transitional housing needs of homeless individuals and homeless families (especially extremely low income) to prevent them from becoming homeless, to help homeless persons make the transition to permanent housing and independent living, specific action steps to end chronic homelessness, and to address the special needs of persons who are not homeless that were identified in the strategic plan as needing housing or housing with supportive services. Describe the status of the homeless coordinating council(s) serving the area covered by the Consolidated Plan. Describe any actions being taken to achieve objectives listed in Table 2C.

Consolidated Plan Narrative	***CAPER Narrative***
The State is continuing its efforts in supporting the goals and objectives outlined in its ten year plan to end chronic homelessness and to reduce overall homelessness. The State's vision as adopted by the State Homeless Coordinating Committee is, "Every person has access to safe, decent, affordable housing with the needed resources and support for self-sufficiency and well-being". There continues to be many needs of households who are homeless or at risk of becoming homeless. Even with unemployment numbers on the rise we have seen a slight decrease in the absolute number of households seeking assistance; this is due in part to a significant decrease in the number of chronically homeless households needing assistance. *We continue to monitor the viability and utilization of our temporary housing options and are working to ensure that they are used as temporary only. This entails identifying long term stayers or potential long term stayers up front and directing them toward permanent supportive housing options. We continue to monitor the length of stay and have seen decreases in the length of stay which correlate to the implementation of our permanent supportive housing options.* *We are also beginning to increase community involvement with community based assessments of needs, services/resources, gaps, and service integration. This community assessment process gives particular attention*	

to our homeless system to ensure all of the programming supported with ESG or PAHTF dollars are achieving the goal of ending homeless episodes for households. As part of our plan to end chronic homelessness, we continue to support the development and maintenance of permanent supportive housing. *We have found this to provide benefits in three areas of relevance. First, a reduced service level costs to community systems. We anticipate saving $8,000 per year for each chronically homeless individual placed in permanent supportive housing. Second, we free up capacity to serve additional individuals within our emergency shelter system. For every chronically homeless person placed in housing, we generate capacity to serve 2.4 additional short term homeless clients within our emergency shelter facilities. This continues to help us serve additional clients experiencing homelessness without having to invest in the construction or leasing of additional facilities. Third, we have seen improvements in housing retention from residents placed in permanent supportive housing projects. Ongoing research is being used to identify how to target those at risk of becoming homeless who need a housing intervention. This includes analyzing those seeking HPRP and TANF assistance and assessing the relevant risk factors that can be identified at intake to properly target scarce prevention and housing resources. We have worked and continue to work with local housing authorities and our housing finance agency in providing incentives to create and maintain housing options for persons with disabling conditions or extremely low incomes. All of the activities related to homeless funding under the state purview is directed by the State's Homeless Coordinating Committee (SHCC). The Committee is currently chaired by the Lieutenant Governor and is comprised of all of the state agencies relevantly involved with delivering services and/or programs for*	

the homeless. The Committee meets four times per year with one of the meetings being the allocation of Emergency Shelter Grant and Pamela Atkinson Homeless Trust Fund dollars. The SHCC continues to support the twelve local committees organized throughout the state to address homeless issues on a local level. These local committees regularly report to the SHCC on the status of their efforts and any barriers they may be facing from state agencies in the implementation of their local plans to end homelessness. Overall we have made tremendous strides in creating permanent supportive housing, focusing our temporary options to be temporary only and averting the need to build new emergency shelter facilities. During our efforts, we have seen a significant decline in the number of chronically homeless individuals. We have also seen a significant decline (50%) in the number of persons who are unsheltered as measured in our point in time count. We expect that with the implementation of new permanent supportive housing, we will see those numbers continue to improve.	

Narrative 11 - Discharge Coordination Policy

Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds should develop and implement a "Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include "policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons." The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge Coordination Policy and how the community will move toward such a policy.

Consolidated Plan Narrative	***CAPER Narrative***
The State Homeless Coordinating Committee will continue to manage the state's efforts in managing and implementing a discharge coordination policy statewide. The SHCC has distinct subcommittees focused on addressing these issues with the following institutions of care: hospitals, juvenile justice, foster care, corrections. Each institution will work with DHCD's Continuum of Care staff member to develop a plan to address each institution's unique issues - with a goal for keeping discharged persons from homelessness and ton integrate such persons into society. *SHCC will continue to apply a system-wide approach to help discharged individuals avoid homelessness. Related policies have been drafted and presented to the State Homeless Coordinating Committee. All policy implementation continues to be directed by the cabinet level member of the SHCC responsible for that institution of care and is reported at the quarterly SHCC meetings (for accountability purposes). In addition, DHCD will regularly run HMIS data in conjunction with other public data to ensure that prevention activities are successful.* *Currently the discharge list for youth waiting for housing assistance approximates 100. In Salt Lake County, the Youth Task Force will continue to identify existing resources and evenly distributing youth across providers. The Task force has identified 800+ at-risk*	

youth in the SLC area during the past year. *DWS is continues to refine protocol for those leaving incarceration, juvenile justice, and foster care. DHCD staff will meet at least biannually with DWS to better coordinate on discharge planning.* *Set-aside housing units will be targeted during 2011-12 when DHDC conducts on-going compliance monitoring. DHCD will ensure that housing units originally targeted to support discharged populations continue to target those populations. DHCD will ensure that service providers are tapped into the State of Utah's affordable housing database of property and unit listings.* *The Department of Workforce Services' Supportive Services Committee will continue refinement of its employment model to achieve greater employment results for those residing in permanent supportive housing projects. An incentive protocol is being considered.*	

Narrative 12 - Allocation Priorities and Geographic Distribution

The action plan must describe the reasons for the allocation priorities and identify the geographic areas (including areas of low-income and minority concentration and specific communities, by name, with distressed and disadvantaged populations) in which it will direct focus and assistance during the program year. For each of these named communities, include a brief explanation of how needs will be met and resources focused. For programs in which the funds are distributed through a competitive process and cannot predict the ultimate geographic distribution of the assistance, a statement must be included in the action plan indicating that fact. In instances where areas receiving funds have already been identified by the time the Consolidated Plan is submitted, the geographic areas where assistance will be provided (including identification of areas of minority concentration) must be described in the action plan. Where the method of distribution includes an allocation of resources based on geographic areas, the rationale for the priorities for such allocation must be provided. Identify any obstacles to addressing underserved needs. Where appropriate, estimate the percentage of funds to be awarded to targeted areas. Key indicators for measuring performance should be included in table 2C.

Consolidated Plan Narrative	***CAPER Narrative***
The distribution of HUD funds by DHCD under this Consolidated Plan 2010-15 are based upon each program's allocation plan and selection criteria. The updated Analysis of Impediments also serves as a resource to better focus on the needs of underserved populations. *At the state level CDBG, awards are initially allocated to regions on a geographic basis where individual communities compete for funds based upon the need of each community within the respective region. The individual area consolidated plans detail the local process.* *HOPWA funds are awarded and prorated by DHCD to service areas based upon that area's percentage to overall population served statewide. For HOME and ESG, there is no geographic distribution of funds. But, funds are ultimately awarded to projects and services that serve disadvantaged areas. For example, the OWLHF Board will consider the targeted populations' AMI in considering funding of one project over another.* *It should be noted that DHCD works with LIHTC administrator, the Utah Housing*	

Corporation, RCAC (Rural Community Assistance Council), HUD, and USDA Rural Development to insure that disadvantaged areas of the state have been identified. Often these areas are underserved due to their remote locations, lack of service agencies such as housing authorities, lack of infrastructure and capital, and lack of development capacity for community and housing projects. *DHCD has targeted Native American populations for special projects in 2010-15. These special projects include a Workcamps rehabilitation project for Ute and Navajo homes on tribal lands in Uintah, Duchesne, and San Juan Counties. DHCD will also serve other Native Americans homeowners living off-reservation with the Single Family Rehabilitation and Reconstruction Program. DHCD is working with the Division of Indian Affairs and Utah Indian Housing Council to complete a statewide tribal housing assessment and will assist the Council during 2010-15 on capital fund development to preserve and create more affordable housing on tribal lands.* *The following areas have been designated as disadvantaged areas with housing shortages, unusually high unemployment, significant levels of poverty, low wages compared to rents, concentrations of minority populations, inadequate community infrastructure, economic isolation, and etc. DHCD has adopted these disadvantaged areas and communities as focus areas and will provide technical assistance/outreach to these areas:* *• Bear River Region: Box Elder County (for elderly populations) and Rich County and northern Box Elder County for moderate income housing* *• Uintah Basin Region: All three counties (Duchesne, Uintah and Daggett Counties including Ute Tribal lands) possess distressed populations of elderly, disabled, and lower paid workers.*	

• Wasatch Front (non-entitlement only): Small Cities *• Six-County Region: Eureka, and Torrey* *• Five-County Region: Counties will apply for their areas and determine the priorities for their respective applications* *• Southeastern Region: due to high levels of disadvantaged communities in this region, agency has determined to prioritize based upon project type rather than region. Priority projects include housing, economic development and community development.* *• Mountainland Region: Midway, Coalville, Hennifer, Kamas, and Samak* *State-wide, local financial resources are inadequate for meeting community needs (elderly housing, community infrastructure, and housing for the disabled, economic development). And, DHCD endeavors to place HUD entitlement funds for highest and best leveraging with local resources while helping to introduce new funding partners to these communities. DHCD staff meets with potential partners on at least a quarterly basis to coordinate services, identification and prioritization of needs, and resource leveraging. One forum for this coordination is the Utah Housing Coalition. DHCD continues to maintain an active partnership with the banking community including the CRA Committee of the Utah Banker's Association and the FDIC's community advisors to leverage possible Community Reinvestment Act set-aside funds.* *Distressed and underserved areas generally require more technical assistance and capacity sharing to access and administer DHCD funds and any partner dollars. To this end, DHCD staff and partners will continue to provide one-on-one and small group trainings during 2010-15. Topics include software to project local needs, developing and updating local housing plans, procuring a developer partner, project development, HOME regulations, best*	

utilization of RDA and CRA funds, tax credit processes, regulatory barriers to affordable housing, Fair Housing, and energy efficiency (see Table 2C). *Another problem for distressed communities is finding reliable and affordable contractors to perform CDBG and HOME funded construction. Although the economic recession has increased availability of contractors, construction pricing and quality has only marginally improved. DHCD continues to work with other labor pools including vocational programs and the weatherization assistance program to assist some outlying communities.*	

Narrative 13 - Community Development (CDBG)

Other Actions -- Describe the CDBG-supported actions plans to be taken during the next year to: address obstacles to meeting underserved needs, foster and maintain affordable housing (including the coordination of Low-Income Housing Tax Credits with the development of affordable housing), remove barriers to affordable housing, evaluate and reduce lead based paint hazards, reduce the number of poverty level families, develop institutional structure, and enhance coordination between public and private housing and social service agencies, and foster public housing resident initiatives. The CDBG narrative must also describe steps taken to minimize the amount of displacement due to acquisition, rehabilitation or demolition of occupied real property. Economic development needs and actions can also be described.

Consolidated Plan Narrative	***CAPER Narrative***
2011 One Year Action Plan *Utah will use its entire HUD allocation (whatever that may be) in meeting the priorities established in the three main program areas of housing, community development and economic development to benefit low to moderate income persons. The states community development efforts for the next one-year period will follow the priorities of the tables listed above.* *Due to the philosophy of local control, each of the seven planning regions has produced a local consolidated plan (see tabs for their respective consolidated plans and community development needs assessment). The state plan above lists the types of projects that are most likely to be funded per preliminary rating and ranking. The regional plans provide an overview of local needs: This document offers a specific plan for how HUD funds will actually be spent on community development in 2011.* *However, proposed cuts coupled with the loss of nearly half of the small cities program population to entitlement status may result in a level of funding that is insufficient to support the priorities in line with the method of distribution.* *Housing continues to climb as the housing and*	

economic crises continues and local officials recognize the need for affordable housing. Despite the drastic economic downturn, Utah is still one of the fastest growing states; therefore planning is a high priority. Economic development needs remain high, but qualification can be problematic for local jurisdictions. *The state allows each AOG to apply for up to 15% of their regional CDBG allocation for administration and planning. A significant portion of this amount will go towards planning, as it remains a critical need in rural Utah. This will put the state above 15% but below the 20% cap for administration and planning. State staff monitors to insure the cap is not exceeded.* *The state encourages applications utilizing the full spectrum of CDBG eligibility including economic development, housing and community development.* *Public service projects are encouraged but are limited to capital improvements and major equipment purchases. Public service expenditures are capped at 15% of the states total allocation.* *At the time of this writing funding levels are unpredictable but applications are being reviewed by the regional rating and ranking review committees. Given the status of the national budget it is impossible to tell what applications will be funded at the time of this writing. However, grants will be made available on the state's web site and in many cases on the regional AOG web sites. Interested parties should feel free to look it up at http://community.utah.gov or contact the state office toll free at 877 488-3233 for information on funded projects.* *Regardless of the limits of reduced funding Utah's small cities program will strive to*	

continue to emphasize maximum feasible deference, local involvement and project variety and flexibility.	

Narrative 14 - Economic Development (CDBG)

Describe plan to assist businesses in creating jobs for low income persons, enhance coordination with private industry, businesses, developers, and social service agencies, particularly with regard to the development of the region's economic development strategy.

Consolidated Plan Narrative	***CAPER Narrative***
A strong economy is the key to growth and progress in Utah. In the past few years Utah has faired better than most states as the world, nation and state slowly come out of the worst economic contraction since the great depression. ***Outlook*** *Economic growth in Utah is expected to accelerate throughout 2011. Employment is forecast to increase throughout the year at 1-3% with larger increases as the year progresses. Construction employment is forecast to increase 2.8%, the first year of growth following three years of contraction. As the overall unemployment rate declines to 7.1%, the improving labor market will support increased consumer spending and a broad based recovery.* ***Looking Ahead*** *Utah's economy has endured the great recession better than most states, and expects to lead in the rebound. Indicators are that it will be a slow recovery with continued ups and downs. The role of government and government funded programs in the economic recovery is under attack but continued prosperity depends on continued government incentives and oversight.* ***Utah's Rural Economy*** *Utah's economic engine is based along the Wasatch front from Ogden in the North to Provo in the South. Off of the Wasatch front the economies of other counties varies greatly. With Utah and Davis Counties joining Salt Lake County as entitlements essentially the entire Wasatch Front is removed from the state*	

small cities program. *Evaluating the regional consolidated plans demonstrates how the local economies compare to one another. To gain a better understanding of the challenges and opportunities facing each county the regional plans should be carefully studied.* *In rural Utah, HUD funds continue to be a critical partner in economic development. Revolving Loan Funds (RLF) were set up and capitalized with CDBG funds across the state. Most have cut their ties to HUD funds through the creation of non-profit economic development organizations, with the exception of Five County and the new Mountainland RLF. CDBG RLF funds are a vital part of the rural economy in each region of the state.* *The state also has an interim loan fund that reviews several applications each year. It has been several years since we had an interim loan. However, we are hopeful that future funding would be adequate for interim loans. The Applications, Procedures and Policies Manual available on line or directly from the state fully explain these policies.* *All economic development projects must be vetted by the state staff, especially loan programs such as 108.* ***Comprehensive Economic Development Strategy/Plan*** *The regional consolidated plans contain a great deal more information than is contained in this plan. Below are links to each of those regions plans. It is strongly recommended, that the regional plans be viewed via their respective web sites.* *BRAG – http://www.brag.utah.gov* *FCAOG - http://www.fivecounty.utah.gov* *MAG - http://www.mountainland.org* *SCAOG - http://www.sixcounty.com*	

SEUALG - http://seualg.utah.gov *UBAOG http://www.ubaog.org/* *WFRC – http://wfrc.org/cms/* ***One Year Action Plan*** *Economic Development is a top priority for the state and is expected to become an even higher priority over the next year as we rebound from the global recession and housing collapse.* *The future role of CDBG funding in economic development is uncertain due to the uncertainties in the level of funding the state is poised to receive.*	

Narrative 15 - Energy Efficiency

Describe how capital improvement projects and structures funded with HOME, CDBG, ESG, and HOPWA dollars will receive cost effective energy upgrades for long-term utility cost savings and for a healthier environment. Please note that any projects funded through the Olene Walker Housing Loan Fund Board and Private Activity Bond Board are required to be ENERGY STAR-qualified..

Consolidated Plan Narrative	***CAPER Narrative***
It is well known that energy efficiency provides America with greater energy independence, energy security, reduction in green house gases, and system reliability. Energy efficiency also helps improve air quality for Utah communities. For affordable housing to be truly affordable, it must be energy efficient - to keep rents down while keeping residents warm and healthy. Such are the beliefs behind a policy to promote energy-efficient construction adopted by the Olene Walker Housing Loan Fund, recipient of the EPA's "2008 ENERGY STAR Award for Excellence in Energy-Efficient Affordable Housing". *In 2006, the loan fund's board adopted a policy requiring that all Olene Walker housing earn the ENERGY STAR rating, the Environmental Protection Agency's standard for superior energy efficiency. Since that date, the fund has provided funding for 3,650 ENERGY STAR affordable housing units, saving low income Utah households an estimated $1,100,000 per year on their energy bills.* *The 2008 DHCD analysis of 148 OWHLF units finds that affordable housing built to ENERGY STAR standards saves homeowners more money than previously thought. Actual utility costs per unit average $62 a month, according to the study. That's 12 percent cheaper than the $70 bill that independent energy auditors had estimated tenants would pay to heat, cool and light their apartments.* *As a leader in energy efficiency, DHCD has also partnered with other community*	

organizations. DHCD's example has resulted in the Utah Housing Corporation's adoption of ENERGY STAR for all tax credit funded projects and the Utah's Private Activity Bond Board's adoption of ENERGY STAR for bond-funded affordable housing projects. Other community partners following DHCD's lead include the Community Development Corporation and Salt Lake County Housing. *DHCD requires housing rehabilitation projects to partner with the U.S. Department of Energy's Weatherization Assistance Program to leverage weatherization funds against any HUD HOME dollars.*	

Narrative 16 - Sustainability and Green Projects

Describe how capital improvement projects and structures funded with HOME, CDBG, ESG, and HOPWA dollars meet nationally recognized levels of sustainability or "greenness" such as the Rural Community Assistance Council (RCAC) "mid green" level, the Enterprise Green Community's Checklist, or the LEED Silver rating.

Consolidated Plan Narrative	***CAPER Narrative***
In addition to ENERGY STAR, DHCD has adopted green criteria including the Enterprise Foundation's Green Communities Checklist and the U.S. Green Building Council's LEED process for projects funded through the OWHLF Board. DHCD provides competitive advantage (through points assigned) to those projects achieving either of these two levels of green performance. In addition, DHCD is working with USDA Rural Development and RCAC to establish a residential green recognition level. At the January 2011 OWHLF Board meeting, 85% of the proposed projects agreed to meet the DHCD green performance levels.	

Narrative 17 - Section 3

Describe how capital improvement projects and structures funded with HOME, CDBG, ESG, and HOPWA dollars achieve compliance to the federal Section 3 requirements to ensure that economic opportunities generated from HUD funded projects, to the greatest extent feasible, will be directed to low and very low-income persons - particularly those receiving assistance from housing, and the businesses that provide them economic opportunities.

Consolidated Plan Narrative	***CAPER Narrative***
A copy of the Utah Section 3 plan can be found on our website at: *http://housing.utah.gov/cdbg/documents/Section 3 Plan.pdf*	

Narrative 18 - Other

Consolidated Plan Narrative	***CAPER Narrative***
NA	