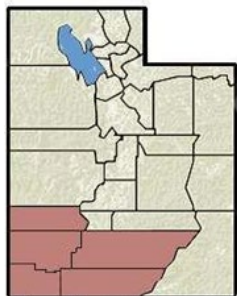


2023 Five County Association of Governments CDBG Annual Action Plan

For July 1, 2023 - June 30, 2024



Five County Association
of Governments

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Executive Summary

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

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

Work Completed

The Five County Association of Governments Community and Economic Development staff provide technical planning assistance to Low-and Moderate-Income communities in the region. Our efforts also support those communities in completing Community Development Block Grant (CDBG) applications to fund projects in the region. During the 2022 Fiscal Year, the FCAOG staff activities included:

- Assisted in the completion of annual reporting for communities with moderate income housing plans. Provided reminders for Moderate Income Housing Plan annual reports to applicable communities in Five County Region. Provide support in completing the document.
- Training on Capital Improvement Planning in the region
- Implementing projects using CDBG CARES Act funding.
- Participating with the local Washington County Housing Action Coalition (HAC) and Local Homelessness Council (LHC).
- Revision of FCAOG CDBG Rating and Ranking Criteria.
- How to Apply Workshops hosted for eligible CDBG applicants.
- Hold consultation meetings with each CDBG applicant in Five County region.
- Support community applications for CDBG funds.

Outreach and Consultation

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

AOG contacts, organizations, municipalities, counties, special service districts, and nonprofits regularly communicate their needs and challenges. Meetings and communication for various planning processes support ongoing relationships with organizations throughout the region, which provides staff with an

improved understanding of the community need, ongoing projects, and actions the AOG can take to support these organizations in addressing identified problems. Comments from jurisdiction and organizations were solicited through email, meetings, and phone calls.

Expected Resources and Allocation Priorities

The Five County region is expecting to receive \$994,669 in CDBG funding in the 2023 program year. The expected FY 2023 allocation will be used to address challenges and needs identified through regional, county, and local priorities.

Five County regional priorities were determined by engaging cities, towns, and counties in the region, asking community leaders to prioritize needs in the community. Comments and recommendations were then reviewed by the Five County Association of Governments Executive Director, in consultation with the Finance Committee members. Priorities include: 1) Public Infrastructure; 2) Public Safety Activities; 3) LMI Housing Activities; 4) Community Facilities; 5) Public Services; and 6) Projects to remove Architectural Barriers (ADA). Priorities are reflected in the regional Rating and Ranking Criteria.

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

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

Housing

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

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

The Five County Association of Governments has aided communities in the region which are required by Utah State law to submit an annual report to the Division of Housing and Community Development. The report documents progress on the community's progress on Moderate-Income Housing Plan strategies, in compliance with Senate Bill 34. There are eight communities which are required to submit an annual report in the Five County region. Communities assisted in the 2021 year include Cedar City, Santa Clara City, Iron County, and Washington County.

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

Outreach

Consultation

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

Consultation

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

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

The following organizations and groups were consulted for the report:

- The Five County Association of Governments Rating and Ranking Committee.
- County, City, and Town jurisdictions
- Special service districts

- Non-profits
- Housing Authorities

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

Mayors and clerks of 38 municipalities and commissioners, clerks, and administrators of five counties were contacted to provide capital improvement list updates to include in this report. Jurisdictions were contacted directly by AOG staff to assist in completing the required Capital Improvements List information. Community and Economic Development staff will meet with local elected officials and/or staff throughout the region to discuss the community development needs indicated in their jurisdiction's updated capital improvements lists during the 2022 year, to assist in the completion of capital improvement projects throughout the region. Assistance from the AOG staff includes, but is not limited to, planning, environmental review, site mapping, support in strategizing and understanding funding sources, and completing CDBG applications.

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

Results

Consulting with organizations and agencies throughout the Five County Region gives AOG staff an understanding of the region's affordable housing and community development priorities. With this information, the AOG staff can relay data-driven recommendations, plans, and resources to local entities to make appropriate goals for CDBG program execution. Consultation informs the content discussed in this document.

Citizen Participation

A 30-day public comment period soliciting public input of the draft Five County report for the Utah 2022 Annual Action Plan opened on February 27, 2023, and extended through March 27, 2023. The public was encouraged to review the draft plan and leave staff with comments, concerns, or questions. Staff would respond to comments during a public hearing, which was held on March 27, 2023, at 6 pm. Comments made, staff responses, and edits made are documented in the final draft of the report.

A copy of the report draft was available for public review during the 30-day comment period on the AOG website, attached to the Utah Public Meeting Notice website post, and at the Five County Association of Governments office at 1070 West 1600 South, Building B., St. George, UT 84770 from 9:00 am to 5:00 pm on business days.

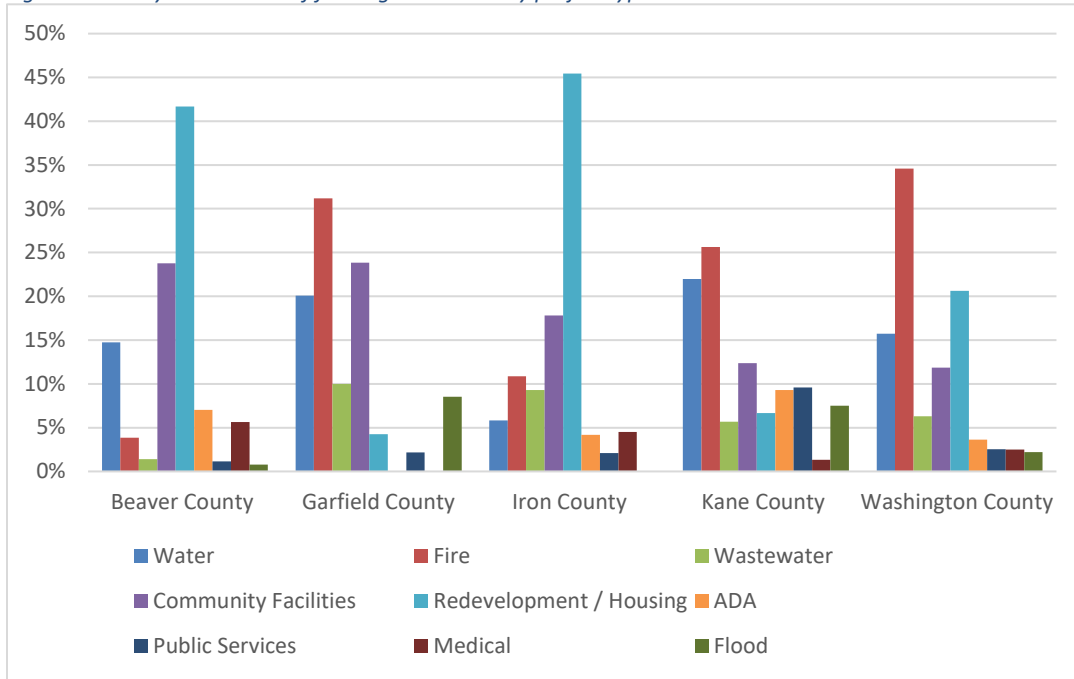
At the conclusion of the public comment period, a public hearing will be held to describe the comments, concerns, and questions received and any changes made to the plan.

Expected Resources

Annual Allocation	\$994,669 (expected)
Program Income	\$0
Prior Years Resources	\$0
Total	\$994,669

Between 1982 and 2021, communities in the Five County region have received \$23,819,545 of Community Development Block Grant funding for community development projects designed to improve living conditions for those who are of low-to-moderate income. This amount does not include allocations of CDBG funds for regional projects and funding that came directly to the AOG. Past CDBG projects funded include water, fire, wastewater, community facilities, redevelopment/ housing, ADA, public services, medical facilities/ambulances, and flood control related projects. Each county has had a variety of project types in the program history, showing the varying community development needs in the region. Figure 1 illustrates the past CDBG projects completed by county.

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



Source: Five County AOG 2022 CDBG funding records

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Goals & Objectives

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

Goal Outcome Indicator	Quantity	Unit of Measurement
Public Facility or Infrastructure Activity other than low/moderate income housing benefit	3,863	Persons Assisted
Public Facility or Infrastructure Activities for low/moderate income housing benefit	0	Households Assisted
Public service activities other than low/moderate income housing benefit	0	Persons Assisted
Public service activities for low/moderate income housing benefit	0	Households Assisted
Facade treatment/Business building rehabilitation	0	Business
Rental units constructed	0	Household Housing Unit
Rental units rehabilitated	0	Household Housing Unit
Homeowner housing added	0	Household Housing Unit
Homeowner housing rehabilitated	0	Household Housing Unit
Direct financial assistance to homebuyers	0	Households Assisted
Homelessness prevention (Includes Short Term Rental Assistance)	0	Persons Assisted
Businesses assisted	0	Businesses Assisted
Jobs Created/retained	0	Jobs
Other	0	Other

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

An estimated 1,661 low-and moderate-income persons will be assisted through 2023 public facilities or infrastructure activities that are not inclusive of the LMI housing benefit, with the total benefit estimated at 3,863 persons. Four housing units will be acquired and rehabilitated for rental purposes, which are documented in both the Goal outcome indicator and one-year goals tables.

The Five County Association of Governments does not operate rental assistance, rehab, acquisition, or support production of units. Several CDBG applicants engage in housing activities, including the Cedar City Housing Authority and the Beaver City Housing Authority. The Cedar City Housing Authority intends to apply for CDBG funds for the acquisition and rehab of existing housing units.

Allocation priorities

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

Rating and Ranking Criteria

The Five County Association of Governments uses a comprehensive Rating and Ranking matrix to determine the priority for funding of all CDBG applications. The Rating and Ranking criteria used in the Five County Region assesses a jurisdiction's project priority, LMI population, Civil Rights compliance, application quality, and several other metrics. The criteria are approved by a group of local elected officials functioning as the Rating and Ranking Committee (RRC). Rating and Ranking Criteria benefit the Five County AOG and CDBG applicants with an objective process that considers project maturity, regional priorities, and the goals of the CDBG Small Cities Program in the selection process. The matrix and recommendations for FY 2023 application evaluation was presented to the Rating & Ranking Committee for prioritization in August of 2021. See Appendix D for a copy of the Fiscal Year 2023 Rating & Ranking Criteria, Policies, and Guidelines.

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

Regional Priorities

Regional project priorities are identified through One-Year Capital Improvement Plans that AOG staff collects from individual community, county, and special service districts, which identify the eligible CDBG projects on the capital improvement lists, shows which communities would like to utilize CDBG funds for their projects, and specifies other applicable funding sources for the projects contribute to local priority determination. In addition to the collection of Capital Improvement Plans, the AOG staff requested feedback on priorities directly from the elected officials of the region's cities, counties, and towns. This data was aggregated and documented in a memo to the Executive Director and Finance Committee, who set the regional priority, per the regional policies and procedures. The 2023 Program year priorities in order are: 1) Public Infrastructure; 2) Public Safety Activities; 3) Community Facilities; 4) LMI Housing activities; 5) Parks and Recreation; and 6) Projects to remove Architectural Barriers.

Community Development

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

- **Public Housing** - Regional efforts will continue to focus on projects designed to provide for the housing needs of very-low and low-moderate income families. This may include the development of infrastructure for LMI housing projects, development of Moderate-Income Housing Plans, land acquisition or the actual construction of housing units for elderly, low-income and homeless individuals, housing rehabilitation.
- **Public Infrastructure** - Regional efforts will focus on increasing the capacity of water and other utility systems to better serve the customers and/or improve fire flow capacity. Wastewater disposal projects are included in this category. Jurisdictions throughout the region will continue to focus on addressing transportation related projects, i.e., streets/bridges, curb, gutter, sidewalks to address drainage issues and airport improvements. The use of CDBG funds for transportation projects is extremely limited due to the nature and higher level of funding needed.
- **Public Safety** - Efforts will be concentrated on addressing projects related to protection of property, including flood control or fire protection improvements in a community. Priority should be given to developing additional fire protection in underserved areas.
- **Community Facilities/Public Services** - Regional support will be provided to jurisdictions undertaking construction of projects such as senior citizens centers, health clinics, food banks/shelters, and/or public service activities. These activities traditionally have no available revenue source for funding and have typically been turned down by other funding sources. This category does not include facilities that are primarily recreational in nature.
- **Parks and Recreation** - Jurisdictions will continue to foster projects designed to enhance the recreational quality of a community i.e., new picnic facilities, playgrounds, community recreation centers, trails, etc. While parks are an important element in a community, the focus of funding in this Region is generally directed towards needed infrastructure, facilities, and affordable housing.
- **Planning** - Jurisdictions throughout the region will continue to direct planning efforts towards feasibility studies and various planning for projects such as storm drainage, water system master plans, senior citizen center design, city housing data base and capital facilities plans.
- **Economic Development** - Some of the jurisdictions in the Five County Region are taking steps to rehabilitate historic buildings and/or museums that play a vital role in terms of historic community values and to foster tourism in the area. The Five County Economic Development District's Comprehensive Economic Development Strategy (CEDS) identifies the regional economic development priorities found in the CEDS document.

Projects to be Rated and Ranked

The following communities are applying for CDBG in 2023. It is anticipated that several of the projects will be fully or partially funded, with projects completed within HUD approved timelines, if the Five County region receives the anticipated amount of \$907,269.

- Beaver City — CDBG funds will be used for ADA improvements to the community's City Center.
- Cedar City on behalf of Cedar City Housing Authority – CDBG funds will be used to acquire 3-4 units to be used for low- and moderate-income housing.
- Tropic town – CDBG funds will be used to make improvements to the City Park.
- Five County AOG — Consolidated Plan Planning, Administration, Rating and Ranking - AOG staff will aid communities by updating the regional Consolidated Plan, CDBG program administration, develop capital improvement lists, and conduct project Rating and Ranking.
- Five County AOG — CED staff will develop and update community Moderate Income Housing Plans, provide technical planning assistance, and conduct planning trainings to communities.

LMI Communities

The Utah State Housing and Community Development Office, which administers the State Small Cities CDBG Program throughout Utah utilizes a Pre-approved LMI Community List taken from the American Community Survey (ACS) to document concentrations of LMI population for towns and cities. The Pre-approved LMI communities from the Five County region include: Alton Town, Boulder Town, Brian Head Town, Cedar City, Enoch City, Escalante City, Garfield County, Glendale Town, Hatch Town, Henrieville Town, Hildale City, Iron County, La Verkin City, and Panguitch City. Pre-approved LMI communities can apply for community wide projects without completing a survey, although a survey is recommended to verify LMI status. This year, Tropic Town completed a survey which showed them to be at 71.7% LMI.

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

Utah is one of the fastest growing states in the United States and communities may experience significant population change during the valid survey period. It is the responsibility of the city, town, or county to provide accurate population data from reputable sources. Significant changes in population in the community with a valid survey may require additional surveys to demonstrate the impacts of the population change on the LMI eligibility of the community.

Panguitch City, Angell Springs, Beaver City and New Castle communities are currently determined as LMI based on the results of a CDBG income survey. As well as the addition of Tropic Town.

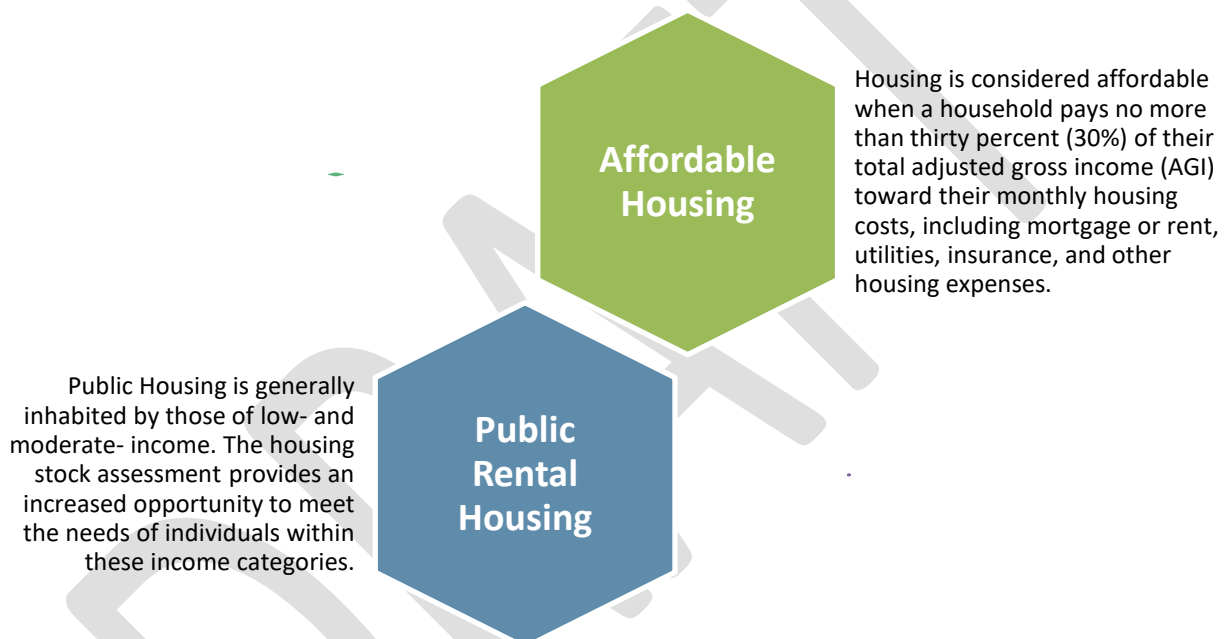
Awarding Funds

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

Public Housing

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

We envision the Five County Region fortified with vital and healthy communities, which provide residents with quality housing that is safe and affordable, located in aesthetically pleasing neighborhoods which provide sanctuary and stability.



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

Five County Region Housing Authorities

Beaver City Housing Authority and Cedar City Housing Authority are the two housing authorities operating within the non-entitlement areas of the Five County Region. St. George Housing Authority is the only housing authority in the entitlement area. The Five County Association of Governments coordinates with local housing authorities through frequent, varying forms of communication. The AOG

and housing authority connections result in an understanding of the successes and challenges that housing authorities face—direct knowledge that the AOG can incorporate into community plans to address affordable housing constraints.

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

Cedar City Housing Authority

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

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

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

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

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

Beaver City Housing Authority

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

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

Public Housing Statistics, 2023					
Agency	Public Housing Units	PH Waiting List	Section 8 Vouchers	Section 8 Waiting List	Other affordable housing units
Beaver City Housing Authority	18	8	19	10	62
Goal Outcome Indicator	Beaver Housing Authority				
Rental Units to be constructed	0				
Rental Units to be rehabilitated	4				
Homeowner Housing to be added	8				
Homeowner housing to be rehabilitated	0				

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

Barriers to Affordable Housing

Utah House Bill 259 requires municipalities with certain populations and all counties to plan for moderate-income housing growth as an element of their general plan. The purpose of this element is to assess the gaps and needs for affordable housing for LMI populations. In addition, Utah Senate Bill 34 requires that all cities and counties within a set population range implement three or more affordable housing strategies in their General Plan housing element and annually report progress on strategy implementation. A review of local general plans and land use ordinances for municipalities in this region has identified some provisions for affordable housing in the community's respective ordinances. Despite progress made to remove barriers to affordable housing, each city can take measures to improve opportunities to develop affordable housing.

There is also an anticipation of more affordable housing legislation in this year's session that the FCAOG is aware of and monitoring that progress.

Moderate Income-Housing Plans

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

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

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

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

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

Common Barriers to Affordable Housing

There are 38 incorporated cities and towns, and five counties in the region that have varying codes, ordinances, policies, demographics, etc. Each community may experience differing housing barriers and challenges in providing affordable housing. An element of the Moderate-Income Housing Plan analyzes the existing zoning codes and land use policies in a community that can limit the development of Affordable Housing. The following are some barriers to affordable housing found in these analyses but is not a comprehensive list.

Affordable & Fair Housing Barrier and Strategies	
Barrier	Strategy
Development costs (impact fees) are passed onto the consumer	<ul style="list-style-type: none"> • Local governments can seek low-interest loans and/or grants to reduce development costs. • Continue to encourage jurisdictions to enact measures to reduce or waive such fees for projects that include affordable housing opportunities. • Enact graduated impact fees, which incentivize more central development with lower fees, thus more accurately pricing the development impact, and improving housing affordability.
Lack of ordinances which specifically mandate the provision of affordable housing	<ul style="list-style-type: none"> • Use inclusionary zoning to ensure that developments allocate a portion of the units to low- and moderate-income home buyers.
Costs of pre-development construction and on-site work is excessive	<ul style="list-style-type: none"> • Zone for higher densities to centralize services. • Encourage in-fill development and adaptive reuse. • Suggest implementation of mixed-use rehabilitation projects, i.e., retail ground level store fronts with low-income apartments on upper levels.
	<ul style="list-style-type: none"> • Zone for higher densities and allow smaller building lots, multi-

Affordable & Fair Housing Barrier and Strategies	
Barrier	Strategy
Historically the cost of property acquisition has affected housing affordability. Large minimum lot sizes tend to inhibit the viability of building affordable housing.	<p>family housing, and accessory dwelling units.</p> <ul style="list-style-type: none"> • Flexibility in zoning ordinances for open space requirements, parking provisions, etc. on low-income housing development. • Study pre-development cost reduction using community land trusts. • Partner with non-profits and/or Housing Authorities on low-income housing developments. • Encourage density bonuses for projects which provide affordable housing opportunities. • Use community land trusts, where the homeowner purchases the house, and the trust is the landowner, to reduce mortgage costs.
Not enough coordination between government programs and other funding sources	<ul style="list-style-type: none"> • Interagency collaboration to network information, resources, and services. • Partner on projects with other housing providers and lenders to reduce costs to low-income consumers. • Provide educational program(s) to inform local governments on their role in the scope of participation with other entities. • Joint rapid-rehousing project between Five County AOG, Canyon Creek Women’s Crisis Center, and Dove Center. • Share data during LHCC meetings and strive to mutually assist other agencies in meeting the HUD performance standards which are being implemented for homeless providers. This will include greater collaboration and outreach to Head Start, Child Care, and Early Education providers.
Private sector developers may not be taking a sufficient role in the provision of affordable housing	<ul style="list-style-type: none"> • Work with local employers to establish employer assisted housing (EAH). Ultimately, EAH builds employee loyalty and reduces turnover by offering rental assistance.
Lack of rental assistance available	<ul style="list-style-type: none"> • Collaborate with local non-profits, clergy, and Housing Authorities to increase the availability of rental assistance programs, including Section 8 housing.
Lack of knowledge about housing options or personal best practices to purchase housing.	<ul style="list-style-type: none"> • Encourage low-income persons to participate in First Time Home Buyers education courses. • Outreach to residents and tenants of public and manufactured housing assisted by public housing agencies to inform them of available down payment/closing cost assistance. • Follow fair housing laws to prevent discrimination against minority groups, the elderly, disabled, single parent households, and other protected classes.

Affordable & Fair Housing Barrier and Strategies	
Barrier	Strategy
Increasing utility costs	<ul style="list-style-type: none"> • Greater utilization of HEAT and Weatherization programs in housing stabilization plans for Section 8 vouchers, Rapid Re-housing, and Permanent Supportive Housing. • Increase CSBG funds available for one-time utility deposits. • Provide targeted smart-energy use education to housing clients (lowering thermostat by degrees, weatherizing housing, reporting energy usage problems early, etc.)
Low availability of rental units. This also includes units taken off the market for short-term vacation rentals	<ul style="list-style-type: none"> • Support non-profit developers such as NeighborWorks in increasing inventory. • Better outreach to developers regarding low-income tax credits. • Encouraging local municipalities to address zoning and enforcement issues related to vacation rentals.
Insufficient stock of housing	<ul style="list-style-type: none"> • Consider adaptive reuse programs to convert non-residential structures into multi-unit residential units. • Identify where jobs, multi-modal transit, and essential amenities (grocery, schools, etc.) are in the community to select placement of affordable units. • Use methods like accessory dwelling units to increase housing stock.

Other

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

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

CDBG funds are used by the AOG to develop Moderate-Income Housing Plans with the incorporated Cities and Counties in the region. AOG staff work closely with communities and service providers to maintain and encourages the development of affordable housing. Many communities housing plans indicate that there is limited housing stock available to meet the needs of low- to moderate-income households. The AOG advocates for: the rehabilitation of deteriorated housing stock and rental units to bring them into standard condition; the availability of safe and adequate rentals; availability of a variety of housing types for rental and ownership; seasonal rental housing to support the tourism industry; and the development of additional water and sewer capacity for housing development in higher growth rate areas.

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

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

In 2022, several community organizations contacted FCAOG to discuss their organization and potential projects. FCAOG staff supported the accurate communication of CDBG policies to the organizations. Where potential projects did not align with CDBG policies, alternative options were discussed. Interested organizations were informed how to communicate concerns to the CDBG state staff to discuss concerns with state policies. Among the concerns discussed were the limits of purchasing land, rehabilitation of units, and other certain housing activities to housing authorities.