



WASATCH FRONT REGIONAL COUNCIL

Utah Small Cities Community Development Block Grant (CDBG) Program

2020-2025 CONSOLIDATED PLAN 2021 Annual Action Plan

MORGAN COUNTY

TOOELE COUNTY

WEBER COUNTY

For July 1, 2021 - June 30, 2022

Wasatch Front Regional Council | 41 North Rio Grande Street, Suite 103, Salt Lake City, UT 84101 |

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Executive Summary

The 2021 Annual Action Plan is an annual update to the region’s five-year Consolidated Plan. The Consolidated Plan is required by the U.S. Housing and Urban Development (HUD) in order to best appropriate Small Cities Community Development Block Grant (CDBG) funds. The Consolidated Plan is updated annually and goes through a major revision every five years. The Plan is created in order to best promulgate CDBG program information and funding.

The 2021 Annual Action Plan identifies current housing, economic, and community development priorities based on local and regional needs for the Wasatch Front Region. See below for a list of the cities and counties that make up the Wasatch Front Region’s Small Cities CDBG Program and their 2021 population based on Wasatch Front Regional Council projection population data.

Eligible Jurisdictions within the Wasatch Front Region’s CDBG Small Cities Program 2021 Wasatch Front Regional Council Population Projections	
Morgan County	13,909
Morgan City	5,655
Unincorporated County	8,254
Tooele County	84,732
Grantsville City	13,642
Rush Valley Town	496
Stockton Town	766
Tooele City	46,086
Vernon Town	264
Wendover City	1,630
Unincorporated County	21,848
Weber County (excluding Ogden City, ineligible)	167,042
Farr West City	7,090
Harrisville City	6,664
Hooper City	9,458
Huntsville Town	676
Marriott-Slaterville City	2,387
North Ogden City	18,397
Plain City	7,110
Pleasant View City	10,557
Riverdale City	10,377
Roy City	38,318
South Ogden City	20,207
Uintah Town	1,218
Washington Terrace City	8,972
West Haven City	18,244
Unincorporated County	7,367

Consultation and Outreach

As the CDBG Program administrator for Morgan, Tooele and Weber Counties, the Wasatch Front Regional Council (WFRC) sought involvement from other organizations on the development of the 5 Year Consolidated Plan update which informs the 2021 Annual Action Plan through public announcements and via attendance at housing, community, and economic development related meetings. The Plan was also published online at the Wasatch Front Regional Council's website: www.wfrc.org. There was a 30-day public comment period before the draft was finalized, and no public comments were received. Feedback on the CDBG Program is always encouraged and can be offered anytime by e-mailing WFRC staff member Christy Dahlberg at christy@wfrc.org.

Entities Consulted

City and county representatives as well as representatives from service providers were all encouraged to offer input. Results of the participation process are reflected in the Capital Investment Plan or in the Needs section of the Plan. The following organizations offered input or have been consulted with:

- Morgan County
- Tooele County
- Weber County
- Washington Terrace
- Stockton Town
- Morgan City
- Vernon Town
- Pleasant View
- Riverdale
- South Ogden
- Huntsville Town
- Roy
- Marriott-Slaterville
- Tooele City
- Wendover City

Public Participation

Public participation began with a How to Apply workshop in which the CDBG program is explained to any interested entity or person throughout the region. All applicants become part of the planning process through the submission of a locally prioritized set of projects known as a Capital Investment Plan (CIP). Additionally, each applicant holds a public hearing in order to inform and receive feedback from the general public. In late 2020, five public hearings were held throughout the regions seeking public input. WFRC has a copy of the comments received from the public hearings.

The public was notified of the Consolidated Plan update through a public notice published on the State public notice website www.Utah.gov/pmn noticing the public comment period seeking input and

participation. The 30-day public comment period began February 5, 2020 and ended March 7, 2020. A public comment open house notice was also published for February 18, 2020 held at the Wasatch Front Regional Council at 41 North Rio Grande Street, Salt Lake City Utah, 84101 at 4 pm.

Copies of the Consolidated Plan are available through each city, county, WFRC, select providers, and the State Housing and Community Development Division. WFRC will also provide a copy of the Plan to anyone who makes a request. The public is encouraged to participate in the planning process via the WFRC website, the adoption process for city and/or county Capital Investment plans, the public notice website, direct mail, email or telephone.

The 2021 Annual Action Plan was noticed for a 30-day public comment on January 28, 2021 as well as notice for a public open house to take place via Zoom on February 8th at 4 pm.

Goals & Objectives

The Wasatch Front Region may provide public service activities (up to 15%) and/or capital infrastructure improvements to the following:

- Tooele City
- Tooele County
- Wendover City
- City of Washington Terrace
- Harrisville City
- Huntsville Town

Goal Outcome Indicator	Quantity	Unit of Measurement
Public facility or infrastructure activity other than low/moderate income housing benefit	7,627	Persons Assisted
Public facility or infrastructure activities for low/moderate income housing benefit	12	Households Assisted
Public service activities other than low/moderate income housing benefit	12	Persons Assisted
Rental units rehabilitated	0	Household Housing Unit
Homeowner housing rehabilitated	0	Household Housing Unit
Direct financial assistance to homebuyers	10	Households Assisted
Homelessness prevention	0	Persons Assisted
Buildings demolished	0	Buildings

Allocation Priorities

The Region will consider capital improvement, senior center and community center updates, and other such projects for the benefit of the citizenry that fall within the CDBG guidelines.

The following organizations could receive funding in 2021:

- Huntsville Town
- Harrisville City
- City of Washington Terrace
- Wendover City
- Tooele City
- Tooele County

Include a list of projects which you may to do in the upcoming year

- Waterline Replacement
- Senior Center Upgrades
- Road Repair
- Sewer Infrastructure
- Community Center Upgrades

See Appendix A for a more detailed project list.

Expected Resources

Annual Allocation, Program Income, Prior Year Resources, Total

2020 Allocation	Program Income	CDBG-CV Funds	Total
\$978,712	\$0	\$1,745,289	\$2,724,001

Narrative Description of the funds

The Wasatch Front Region will receive an estimated total of \$978,712 for the 2021 program year. The base 2021 allocation was \$978,712. Zero dollars were received in program income. Zero dollars were received in re-allocated funds. \$1,745,289 were received in CDBG Covid relief funds. Of the 7 new requests, 3 are anticipated to be fully funded, 1 will be partially funded, and 3 will not funded at all.

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

The Wasatch Front Region does not require that projects have a match. However, those projects that do match CDBG funds with other funds will receive additional points when it comes to project rating and ranking. In 2021, of the projects that may be funded, 2 would provide additional local funding. The total project cost of all 2021 applications was \$2,230,842.

Method of Distribution

Here are the steps used to effectively distribute CDBG funds in the Wasatch Front Region.

1) Identify Regional Priorities

Regional priorities are identified based on local goals and objectives. Since 2012, the region's priorities are housing for LMI persons and community infrastructure for LMI persons. The Committee weighs certain criteria higher in order to reflect the regional priorities. Any project that provides housing for LMI persons will receive 5 additional points. Community infrastructure projects that maintain, preserve, or update the jurisdiction's water or sewer systems for LMI persons will receive 6 additional points.

2) Identify Local Projects

In order to determine which projects are awarded, applications are reviewed and ranked according to regionally adopted Rating and Ranking Criteria. The rating and ranking process begins with each community developing a capital investment plan that identifies goals and investment priorities. The plans are updated in connection with one-year action plans.

3) Rate and Rank Projects

Projects are then ranked using a set of criteria called Rating and Ranking Criteria. Wasatch Front Regional Council staff work with a Regional Review Committee (RRC) to review and revise the region's Consolidated Plan, Rating and Ranking Criteria, and to conduct project rating and ranking. The Committee is made up of two officials from each of the three counties in the region: Morgan, Tooele, and Weber. The RRC is responsible for reviewing and selecting projects based on the region's Rating and Ranking Criteria. The Criteria are made up of eight basic required elements that the Utah Division of Housing and Community Development have identified. Additionally, the Regional Review Committee has included additional criteria. These criteria may change depending on the needs and goals that have been identified in the Consolidated Plan. The Criteria are updated annually. The Criteria help ensure that the projects that receive CDBG funding are the ones that are the most needed or desired.

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

Contact Christy Dahlberg at the Wasatch Front Regional Council at 801-363-4250 x 5005 or christy@wfrc.org. Visit our website at www.wfrc.org for more information.

How are potential applicants made aware of the possibility of using CDBG funds?

Participation begins annually with a How to Apply workshop in which the CDBG program is explained to any and all interested entities throughout the region. This notice is made via an email and mailed flyer distributed to all cities, counties, service providers, and others that may qualify for CDBG funding throughout the region. Additionally, CDBG program information is available on the WFRC website, www.wfrc.org.

What is the process for awarding funds?

Grantees are notified of a CDBG grant award by email and/or phone. All grantees must attend a “grantee workshop” sponsored by the State of Utah’s Housing and Community Development Division. This Division also executes the contracts with the grantee.

Describe threshold factors and grant size limits

The minimum grant amount per year is \$30,000. The maximum multiple-year grant award is \$200,000 per year, up to two years. The RRC will not commit more than half of the available funds for any year to any one project. Multiple-year project(s) will not be allowed when existing multiple-year projects commit 50% or more of the following year’s regional allocation. Maximum grant amount per year for community infrastructure projects is \$250,000. Community infrastructure projects include (but are not limited to): water, sewer, street, sidewalk, curb, and gutter. No entity shall receive more than \$250,000 in a single funding cycle, regardless of number of applications.

Anticipated outcomes as a result of the distribution formula

The Consolidated Plan goes through a strategic planning process geared toward housing, homelessness, community service, and community infrastructure, local governments, community organizations, state and federal agencies, service providers, and citizens are all part of the planning process to ensure that local and regional needs, goals, and objectives are considered and planned for. The Wasatch Front Region will have achieved a favorable outcome when Community Development Block Grant funds are distributed to applicants that best meet federal and state program goals, as well as the regional goals identified in the Consolidated Plan.

Affordable Housing

Actions planned during the next year to address the needs for public housing

The jurisdictions within the region must continue to update and report on their moderate-income housing plans, which will help guide future housing related decisions, such as affordability issues, housing choice, workforce housing, building or rehabilitating housing to make more energy efficient, funding opportunities and the like. The state has multiple resources that can be used to help the cities prepare or update their moderate-income housing plans. Cities desiring to do this may contact the Utah Housing and Community Development Division or regional Association of Government. The Regional Council will

continue to inform local governments of the need to report on these Plans and the benefits associated with having a “good” plan.

The Regional Council will continue to inform local housing authorities and other housing providers and lenders of the CDBG program to help ensure collaborative planning and funding opportunities.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

Work with housing authorities and other housing providers to ensure they are aware of housing related funding that is available to them for homeownership opportunities.

Actions planned to foster and maintain affordable housing

In the 2019 Legislative Session, the Utah Legislature passed an “Affordable Housing Modifications” bill, Senate Bill 34, which encourages local communities to plan for housing for residents of all income levels, and coordinate that housing with transportation as well as chose three to four “menu” options of strategies to pursue in order to further Moderate-Income Housing goals. These plans must be reported annually to the Department of Workforce Services, which also administers CDBG to the AOGs. For more information on S.B. 34 visit www.wfrc.org/public-involvement/governmental-affairs/

The menu items from the bill are:

- (A) rezone for densities necessary to assure the production of MIH
- (B) facilitate the rehabilitation or expansion of infrastructure that will encourage the construction of MIH
- (C) facilitate the rehabilitation of existing uninhabitable housing stock into MIH
- (D) consider general fund subsidies or other sources of revenue to waive construction related fees that are otherwise generally imposed by the city
- (E) create or allow for, and reduce regulations related to, accessory dwelling units in residential zones
- (F) allow for higher density or moderate income residential development in commercial and mixed-use zones, commercial centers, or employment centers
- (G) encourage higher density or moderate income residential development near major transit investment corridors
- (H) eliminate or reduce parking requirements for residential development where a resident is less likely to rely on their own vehicle, e.g. residential development near major transit investment corridors or senior living facilities
- (I) allow for single room occupancy developments
- (J) implement zoning incentives for low to moderate income units in new developments
- (K) utilize strategies that preserve subsidized low to moderate income units on a long-term basis
- (L) preserve existing MIH
- (M) reduce impact fees, as defined in Section 11-36a-102, related to low and MIH
- (N) participate in a community land trust program for low or MIH
- (O) implement a mortgage assistance program for employees of the municipality or of an employer that provides contracted services to the municipality

- (P) apply for or partner with an entity that applies for state or federal funds or tax incentives to promote the construction of MIH
- (Q) apply for or partner with an entity that applies for programs offered by the Utah Housing Corporation within that agency's funding capacity
- (R) apply for or partner with an entity that applies for affordable housing programs administered by the Department of Workforce Services
- (S) apply for or partner with an entity that applies for programs administered by an association of governments established by an interlocal agreement under Title 11, Chapter 13, Interlocal Cooperation Act [not in county list of recommendations]
- (T) apply for or partner with an entity that applies for services provided by a public housing authority to preserve and create MIH
- (U) apply for or partner with an entity that applies for programs administered by a metropolitan planning organization or other transportation agency that provides technical planning assistance
- (V) utilize a MIH set aside from a community reinvestment agency, redevelopment agency, or community development and renewal agency
- (W) any other program or strategy implemented by the municipality to address the housing needs of residents of the municipality who earn less than 80% of the area median income

Actions planned to reduce lead-based paint hazards

Within the region, housing authorities can inspect and mitigate lead-based paint. Additionally, in most counties, the health departments have trained and certified inspectors who test residential properties and have brochures and information for residents who think they may have a home with lead-based paint. These agencies handle information calls and explain the process of removing lead-based paint safely. They also coordinate with state programs on how to help educate residents on the dangers of lead-based paint. The Utah Division of Environmental Quality can assess a home for lead hazards and identify certified lead hazard contractors.

Actions planned to enhance coordination between public and private housing and social services agencies

The Regional Council can assist in the coordination of activities among public and private organizations. First, the Council should become aware of all the related low- and moderate-income housing providers within the region. Council staff can then work to ensure that these providers are familiar with one another and work to promote collaboration. Efforts can be made to seek input from these entities as well as to possibly leverage funding in order to consider larger scale projects that would benefit the region as a whole.

Barriers to Affordable Housing

The Regional Council will further efforts to remove or mitigate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. Communities may consider creative ways in providing housing opportunity for all residents no matter their income, race, family size, culture, gender, etc. Local governments are

responsible for working with others to limit potential housing barriers as reflected in their respective moderate-income housing plans. There are a few ways to identify the barriers to affordable housing within a community. The various cities can answer the following questions (and more):

- Has your housing plan been updated within the last two years (as required by law)?
- Does your housing plan provide estimates of the projected housing needs for low income housing with a five-year outlook (or longer)?
- Are housing types and densities considered?
- Do your zoning ordinances allow for various types of housing, including townhomes, manufactured homes, PUDS, duplexes, etc.?
- Is your general plan and zoning consistent with the Wasatch Choice for 2050 Vision for Growth and Development which encourages higher density centers-based development and transit-oriented developments?

Cities should continue to update and report on their moderate-income housing plans, which will help guide future housing related decisions, such as affordability issues, housing choice, workforce housing, building or rehabilitating housing to make more energy efficient, funding opportunities and the like. The state has multiple resources that can be used to help the cities prepare or update their moderate-income housing plans. Please refer to the following table (table 2) for some affordable housing barriers and solutions.

Table 2. Affordable Housing Barriers and Strategies

Barriers	Strategies
Community lacks political will to develop multiple-family housing units.	<ul style="list-style-type: none"> - Share smart growth policies from the Wasatch Choice for 2040 Vision for Growth and Development - The Regional Council gives additional points to requests for funding from cities that support the goals of the Wasatch Choice for 2040 Vision which includes the creation of higher density centers based transit oriented developments
Community does not make concessions for multiple-family housing.	<ul style="list-style-type: none"> - Encourage affordable housing professionals to meet with local planning committees and councils to explain the needs and benefits.
Community has no available land for new development; they are built-out; only option is tear down and build new or infill.	<ul style="list-style-type: none"> - Zone for higher densities and allow for multiple family housing and accessory dwelling units.
Zoning ordinances limit or restrict multiple-family housing.	<ul style="list-style-type: none"> - Request flexibility in zoning ordinances. - Zone for higher densities and allow for multiple family housing and accessory dwelling units.
Housing costs are extremely high i.e. property, construction, building, etc.	<ul style="list-style-type: none"> - Request a reduction in impact fees for low-income housing developments. - Create partnerships with housing authorities, Habitat for Humanity, Affordable Land Lease Homes, Utah Housing Corporation, Rural Housing Development, non-profits, etc. - Encourage more efficient uses of building materials, construction methods and design.
Community lacks the staff with the capabilities needed for developing affordable housing.	<ul style="list-style-type: none"> - Encourage participation of staff in various State training programs.
All resources are fragmented, i.e. federal, state and local.	<ul style="list-style-type: none"> - Partner with housing providers and lenders to increase opportunities. - Provide educational programs and services or direct citizens to such programs and services.
Moderate-income housing plans are not up to date and/or implemented. (House Bill 295 does not require implementation.)	<ul style="list-style-type: none"> - Seek funding from housing programs to hire temporary staff to update plans.
Land owners and developers likely focus on higher profit margins, i.e. upscale developments.	<ul style="list-style-type: none"> - Offer incentives to affordable housing developers.
Citizens in rural areas tend to prefer single-family homes on larger lot sizes.	<ul style="list-style-type: none"> - Explain the need for more affordable housing and housing choice; public awareness is needed.
Communities may feel that multiple-family housing units increase the crime rate.	<ul style="list-style-type: none"> - Explain how affordable housing can be scattered throughout the community; 2 unit condos, townhomes, patio homes.
Good landlord laws are not enforced	<ul style="list-style-type: none"> - Work with local and state legislators.
There is no state law for written rental agreements	<ul style="list-style-type: none"> - There are existing laws. They tend to favor the landlord, however. - Work with local and state legislators to enact one to benefit renters, not just landlords.

Other

Actions planned to foster and maintain affordable housing

In 2020, the region's housing authorities plan to foster and maintain affordable housing through education and training for low- and moderate-income households. In addition, the Regional Council is actively fostering smart growth policies to its member cities which include higher density transit-oriented developments based on the centers design. The housing authorities also offer homeownership opportunities such as down payment assistance. It should be noted that community resistance to high density housing has declined markedly over the past several years and many have been or are being built. The challenge now is to make a share of those high-density units available for low to moderate income persons. Salt Lake City has committed a large share of its redevelopment agency budget to low income housing.

Also reference pages 7 and 8 regarding S.B. 34.

Covid-19

In spring of 2020 when the Coronavirus Aid Relief and Economic Security Act (CARES) passed in congress, Utah's CDBG Small Cities Program received about \$3.2 million dollars (round 1). Subsequently, two additional rounds of CDBG-CV funds have been allocated totaling about \$5.2 million in round 2, and \$2.5 million in round 3. These funds were processed through the State's allocation formula to distribute funds to each of the 7 AOGs who manage the Small Cities Program. These CDBG-CV funds follow all the same regulations as the regular CDBG dollars, but must also prevent or mitigate impacts from or the spread of the Coronavirus. The only difference that applies to CDBG-CV funds is the cap on public service activities is lifted, but public service activities must have a direct correlation with Covid-19.

Round 1

In round 1 of CDBG-CV awards, WFRC received almost \$500,000 to be spent in Morgan, Tooele, and Weber Counties, excluding Ogden City. Thinking of the priorities at the time, the Regional Review Committee (RRC) allocated \$100,000 to the Weber Housing Authority and \$100,000 to the Tooele Housing Authority to provide rental assistance. With the remaining \$300,000 the Committee opted to provide small business grants to businesses in eligible communities. The \$300,000 was distributed to the three counties based on an agreed upon formula, awarded a \$50,000 base to each county and the remainder of those funds divided based on population.

Shortly after these allocations, the State started their own rental assistance program with CARES Act money so our funds were not able to be spent by the Housing Authorities. The remaining money from the Housing Authorities was split three ways and added to each county's balance. Additionally at that time, cities and counties received CARES Act money directly which had at the time an expiration date and less restrictions than CDBG. Weber County started their own business grant program so did not spend their small business grant funds. The following table shows the running balance for each county.

	Morgan	Tooele	Weber
Original Allocation	\$55,995	\$83,574	\$130,338
Redistributed Housing Authority Funds	\$64,081	\$64,081	\$64,081
Money Spent	<\$48,370>	<\$10,000>	\$0
Balance	\$71,706	\$137,655	\$194,419

Round 2

In round 2 of CDBG-CV, WFRC received \$885,964. The requirements for these funds are the same as round 1, with the exception that funds may be spent in entitlement areas in the WFRC AOG region which includes Davis, Morgan, Salt Lake, Tooele, and Weber Counties. The caveat to this is that non entitlement areas (Morgan, Tooele, and Weber Counties excluding Ogden) must receive at least the same amount of funds received in round 1. This leaves about \$386,000 that is eligible to be spent in Davis County, Salt Lake County, and Ogden City. At the end of 2020 the RRC, as representatives of the eligible counties, elected to hold off on spending additional CDBG-CV funds until the new year as at the time their CARES Act funds were set to expire at the end of 2020. The reasoning behind this being that communities had a large amount of CARES Act funding that at the time had an expiration date, and CDBG-CV funds did not. The plan moving forward was to wait until the communities had spent their CARES funds or they were expired, and we could then use our CDBG-CV funds to fill any gaps that remained in the communities. However, those deadlines have since been extended. The following tables represent possible distributions for round 2 funds.

This formula assumes the same formula used to distribute round 1 - \$50,000 base for each county and the remainder split based on population and does NOT account for admin costs for WFRC			
	Morgan	Tooele	Weber
Not including entitlement areas	\$120,076	\$147,655	\$194,419
Including entitlement areas	\$86,798	\$285,508	\$513,657

This chart operates under the assumption entitlement areas are awarded round 2 funds, and is allocated with a base amount then divided based on population			
	Salt Lake	Davis	Ogden
\$50,000 base	\$219,967	\$101,935	\$64,163
\$10,000 base	\$266,368	\$88,335	\$31,364

Round 3

In round 3, WFRC received \$359,427 to be spent in Morgan, Tooele, and Weber Counties excluding Ogden City and must meet the same requirements as the first two rounds of CDBG-CV funding.

This formula assumes the same formula used to distribute round 1 - \$50,000 base for each county and the remainder split based on population and does NOT account for admin costs for WFRC		
Morgan	Tooele	Weber
\$62,566	\$117,017	\$131,939

WFRC is exploring all CDBG-CV eligible projects in eligible communities including but not limited to projects listed on the quick guide and will follow all CDBG requirements.

APPENDIX A

WFRC Capital Improvement Project List

With each project describe the reason for prioritizing that project and what needs you are trying to address

Grantee Name	Sub-Grantee	Project Name	Why a Priority	Needs Addressed
Tooele County	Wasatch Front Regional Council	Planning and Administration	Ensures all eligible entities within the region are aware of program and make a viable application	Program awareness, i.e. all needs
Washington Terrace*	n/a	Water Valve Replacement	Public Infrastructure in LMI area	Adequate Water Service
Harrisville*	n/a	Senior Center Upgrades	LMI Infrastructure Needs	LMI Services
Wendover City	n/a	Pilot Peak Waterline Replacement	Public Infrastructure in LMI area	Adequate Water Service
Huntsville*	n/a	Community Center	Public Infrastructure in LMI area	Adequate Living Conditions
Tooele City*	Tooele Housing Authority	Subdivision Infrastructure	LMI Housing Infrastructure Needs	LMI Housing
Tooele City*	n/a	Water/Sewer Improvements	Public Infrastructure in LMI Area	Adequate Water Service
Tooele County*	Terra	Road Improvements	Public Infrastructure in LMI area	Adequate Living Conditions
<i>*Project has secured matching funds</i>				

