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# **SOUTH JORDAN CITY CITY COUNCIL REPORT**

**Council Meeting Date: 4/6/22**

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**Issue:**           **RESOLUTION R2022-07 – APPROVING THE 2022–2023 ANNUAL ACTION PLAN FOR THE USE OF COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) FUNDS, APPROVING THE UPDATED CITIZEN PARTICIPATION PLAN, AND AUTHORIZING THE CITY TO ENTER INTO A GRANT AGREEMENT FOR THE USE OF CDBG FUNDS.**

**Presented By:** Katie Olson, CDBG Coordinator  
**Submitted By:** Katie Olson, CDBG Coordinator

**Department:** Executive

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## **Staff Recommendation (Motion Ready)**

Approve Resolution No. R2022-07, approving the 2022–2023 Annual Action Plan for the use of Community Development Block Grant (CDBG) funds, approving the updated Citizen Participation Plan, and authorizing the City to enter into a grant agreement for the use of CDBG funds.

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## **Background**

The Community Development Block Grant (CDBG) program is administered by the U.S. Department of Housing and Urban Development (HUD) to support the development of viable urban communities with the goals of providing decent housing, a suitable living environment, and expanded economic opportunities. Funds are allocated to projects by recipient communities on an annual basis according to an Annual Action Plan (AAP) with the intent to meet needs and accomplish goals identified in a five-year strategic plan (Consolidated Plan) for the program year. The AAP requires City Council approval and a public hearing.

The City of South Jordan is an annual grantee of CDBG funds. The 2022–2023 program year represents the City’s eleventh year as a grantee. Projects and project funding included in the 2022–2023 AAP reflect the recommendation of the City’s CDBG Committee (Staff Working Group) based on the set allocation and the objectives and goals of the 2020–2024 Consolidated Plan.

The City is set to receive approximately \$220,000 for the 2022–2023 program year, based on the typical allocations the City has received in the past. HUD has not yet released final allocations. When those are released, funding will be adjusted as allocated in the AAP. The City of South Jordan will submit its AAP with Salt Lake County as a participant of the HOME Consortium.

## **2022-2023 Annual Action Plan – Project & Estimated Funding Summary**

The 2022–2023 AAP was released for public comment on March 22, 2022, prior to HUD’s

announcement of official grant allocation amounts. **Because of this, amounts listed for projects and activities are based on an estimated \$220,000 grant allocation** (determined based on the City’s past allocations). **After HUD announces final allocations, the CDBG Coordinator will adjust the estimated amounts** according to the following contingency plan:

- If the grant amount is higher than \$220,000, the final amount of admin and planning will be adjusted to remain at 20% of the total grant amount, public service amounts will stay as originally allocated, and the remaining funds will be allocated to the ADA ramp activity under the Infrastructure Improvement project.
- If the grant amount is lower than \$220,000, all activities will be adjusted based on the following percentages.
  - The final amount for infrastructure improvements will be at least 67% of the total grant.
  - The final amount for admin and planning will remain at 20% of the total grant amount.
  - The final amount for public services activities will be decreased proportionally from their amounts in this version of the plan. However, no public service activity will be granted more than the maximum or less than the minimum amounts they requested in their applications.

<b>Public Services (using 13% of the 15% Cap)</b>	<b>\$29,500</b>
Domestic violence victim shelter and services (South Valley Sanctuary)	\$10,000
Homeless shelter and services (Road Home)	\$8,000
Homeless hospice care (INN Between)	\$5,500
Domestic Violence legal support services (Legal Aid Society)	\$3,000
Mental health services (Community Health Centers)	\$3,000
<b>Infrastructure Improvements</b>	<b>\$146,500</b>
ADA Ramps	\$146,500
<b>Planning &amp; Administration (20% Cap)</b>	<b>\$44,000</b>
Program Administration	\$5,000
Planning	\$39,000
<b>Total</b>	<b>\$220,000</b>

## **STAFF FINDINGS, CONCLUSIONS & RECOMMENDATION**

### **Findings**

- The City of South Jordan has previously been approved as a grantee of CDBG funds and is expected to receive approximately \$220,000 in CDBG funds in the 2022–2023 program year.
- Grantees are required to have a Consolidated Plan, which is a 5-year strategic plan, and an Annual Action Plan in place to guide the annual use of HUD program (CDBG, HOME, ESG, HOPWA) funds.

- In 2020, the City approved the 2020–2024 Consolidated Plan based on a needs assessment and market analysis that includes a strategic plan to address identified community needs.
- The 2022–2023 Annual Action Plan, the third year of the Consolidated Plan, identifies projects and funding allocations for the program year in accordance with the strategic plan of the 2020–2024 Consolidated Plan.
- The 2022–2023 Annual Action Plan was prepared, as required, in HUD’s online template, the Integrated Disbursement & Information System (IDIS).
- To prepare the 2022–2023 program year projects and allocation recommendations, the City’s CDBG committee evaluated all applications submitted during the application window. The process followed the City’s current Citizen Participation Plan.
- The City is required to have a Citizen Participation Plan. The current plan had outdated information and a discrepancy with HUD regulations. The updated CPP set forth for approval and public comment corrects these errors.

### **Conclusion**

The 2022–2023 Annual Action Plan is consistent with HUD requirements and the strategic plan of the 2020–2024 Consolidated Plan. The updated Citizen Participation Plan is consistent with HUD requirements.

### **Recommendation**

Based on the Findings and Conclusions listed above, Staff recommends that the City Council take public comments and approve Resolution R2022-07—approving the 2022–2023 Annual Action Plan and the updated Citizen Participation Plan and authorizing the City to enter into a grant agreement for the use of CDBG funds—unless facts are presented that contradict these findings or new facts are presented, either of which would warrant further investigation by Staff.

### **FISCAL IMPACT**

It is anticipated that the City will receive approximately \$1,100,000 in CDBG funds during the term of the 2020-24 Consolidated Plan.

### **ALTERNATIVES**

- Approve the resolution.
- Approve the resolution with modifications.
- Deny the resolution
- Schedule the decision for a future date

### **SUPPORT MATERIALS**

- Resolution No. R2022-07

City Council Action Requested:

  
Sunil Naidu (Apr 1, 2022 11:46 PDT)

Sunil Naidu  
Chief Financial Officer/  
Budget Officer

04/01/2022

Date

## **RESOLUTION R2022 - 07**

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SOUTH JORDAN, UTAH, APPROVING THE 2022-2023 ANNUAL ACTION PLAN FOR THE USE OF COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) FUNDS, APPROVING THE UPDATED CITIZEN PARTICIPATION PLAN, AND AUTHORIZING THE CITY TO ENTER INTO A GRANT AGREEMENT FOR THE USE OF CDBG FUNDS.**

**WHEREAS**, the Department of Housing and Urban Development (HUD) has developed the CDBG program, as authorized under Title I of the Housing and Community Development Act of 1974, to provide funds to address community needs through the development of viable communities by providing decent housing, a suitable living environment, and expanded economic opportunity; and

**WHEREAS**, the City of South Jordan (the “City”) has previously qualified for CDBG funds directly from HUD, and the 2022 program year is the City’s eleventh year as a CDBG grantee; and

**WHEREAS**, it was determined through a needs assessment and market analysis that needs do exist within the City that are eligible for the use of CDBG funds; and

**WHEREAS**, a five-year strategic plan (2020-2024 Consolidated Plan) to guide annual spending has previously been approved by the City, and an annual action plan (2022-2023 Annual Action Plan) outlining projects and funding has been prepared in a manner consistent with HUD requirements; and

**WHEREAS**, the City is required to provide the 2022-2023 Annual Action Plan to Salt Lake County, to be submitted in May;

**WHEREAS**, the City is required to have a Citizen Participation Plan (“CPP”), and there are two amendments to the CPP this year that have been approved by the South Jordan City Council (the “City Council”); and

**WHEREAS**, the updated CPP adds text corrections to update current City Hall hours, provides that the CPP will be available via hard copy and online, and clarifies language regarding HUD’s requirement of a 15-day public comment period for the CAPER; and

**WHEREAS**, the City Council finds it in the best interest of the health and welfare of South Jordan citizens to approve the 2022-2023 Annual Action Plan, approve the updated CPP, and authorize the City to enter into a grant agreement for the use of CDBG Funds.

**NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF SOUTH JORDAN CITY, UTAH:**

**SECTION 1. Approval.** The South Jordan City Council hereby approves the 2022-2023 Annual Action Plan and the updated Citizen Participation Plan, as indicated in Exhibits “A” and “B”, and authorizes the City to enter into grant agreements for the use of CDBG funds.

**SECTION 2. Effective Date.** This Resolution shall become effective immediately upon passage.

**APPROVED BY THE CITY COUNCIL OF THE CITY OF SOUTH JORDAN, UTAH,  
ON THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 2022 BY THE FOLLOWING VOTE:**

	YES	NO	ABSTAIN	ABSENT
Patrick Harris	_____	_____	_____	_____
Bradley Marlor	_____	_____	_____	_____
Donald Shelton	_____	_____	_____	_____
Tamara Zander	_____	_____	_____	_____
Jason McGuire	_____	_____	_____	_____

Mayor: \_\_\_\_\_  
Dawn R. Ramsey

Attest: \_\_\_\_\_  
City Recorder

Approved as to form:

  
\_\_\_\_\_  
Office of the City Attorney

## **Exhibit “A”**

### **2022-2023 Annual Action Plan**

# The City of South Jordan

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## **2022-23 Annual Action Plan** for the use of Community Development Block Grant (CDBG) funds

Third year of the  
2020-2024 Consolidated Plan

### **Contact Information**

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# Executive Summary

## AP-05 Executive Summary - 91.200(c), 91.220(b)

### 1. Introduction

The City of South Jordan in partnership with the U.S. Department of Housing and Urban Development (HUD) is required to submit an Annual Action Plan (AAP) as a grantee of funding for the Community Development Block Group (CDBG) program. The AAP sets forth the projects, including funding amounts, to be started that program year. These projects are based on the needs, strategic objectives, and expected beneficiaries set forth in the 2020-2024 Consolidated Plan.

The 2022-2023 AAP is the third year of the 2020-2024 Consolidated Plan and the City's eleventh year as a CDBG grantee. In 2012, HUD approved the City as a grantee for the CDBG program. In order to achieve some of the City's housing objectives, the 2012-2016 Consolidated Plan recommended that the City "apply to participate in the Salt Lake County HOME Consortium" (2012-2016 Consolidated Plan, page 52). The City joined the HOME Consortium in 2014. As a member of the HOME Consortium, HUD has directed the City to participate in the update of the County's consolidated plan, resulting in the 2015-2019 Consolidated Plan. The 2020-2024 Consolidated Plan is the City's second consolidated plan under the Consortium.



City Aerial

### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.



Goal	Needs Addressed	Category	National Objective	Outcome
Correct accessibility deficiencies	Remove barriers to accessibility  Neighborhood Improvements  Housing rehabilitation Public infrastructure improvements	Non-Housing Community Development	Suitable living environment  Expanded economic opportunities	Accessibility  Availability
Support services for vulnerable populations	Homeless Services and Prevention Senior services and facilities  Services for those experiencing domestic Family & individual crisis services & prevention Essential needs services Housing assistance Training, prevention, and education programs Mental Health Economic recovery from COVID-19	Homeless  Non-Homeless Special Needs	Suitable living environment Expanded economic opportunities Decent housing	Sustainability Affordability Accessibility
Support mental health programs and resources	Homeless Services and Prevention  Senior services and facilities Services for those experiencing domestic Family & individual crisis services & prevention Essential needs services Training, prevention, and education programs Mental Health	Non-Homeless Special Needs	Expanded economic opportunities	Accessibility Affordability
Support training, prevention, and education programs	Homeless Services and Prevention Additional affordable dwellings  Services for those experiencing domestic Family & individual crisis services & prevention Essential needs services Training, prevention, and education programs Mental Health Additional affordable	Non-Homeless Special Needs	Suitable living environment Expanded economic opportunities Decent housing	Accessibility Affordability Sustainability

### 3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Since becoming a grantee, the City has received the lowest or second-lowest annual allotment of all CDBG grantees in a seven-state region (Region VIII). The City's annual allocation reflects a relatively small, but rapidly growing, population, and the lack of community concerns, at least at a lower scale, that many other communities face. The City's modest allocation of CDBG funding requires a simple

program and careful project selection. The City strives to address the unique and specific existing concerns in the community in a way that is also preventative of those concerns becoming larger future problems.

The 2022-23 AAP represents the third year of the City's 2020-2024 Consolidated Plan, which includes the following goals and objectives:

- Correct accessibility deficiencies
- Increase access to affordable housing
- Maintain existing housing
- Improve senior facilities and services
- Provide improvements in deficient neighborhoods
- Support services for vulnerable populations
- Support mental health programs and resources
- Support training, prevention, and education programs
- Support COVID-19 response efforts as needed

At the time of creating this plan, the 2021-22 program year is about 75% complete. We have increased advertising of existing services, particularly CDBG-CV funded services. A big accomplishment is that the 2020 and 2021 ADA ramp projects will wrap up in May 2022.

In the 2015-2019 Consolidated Plan, the City identified increasing public outreach and generating more resident input as a key area of improvement. Outreach for the 2020-2024 Consolidated Plan involved a significantly increased effort to obtain public input. Though actual turnout was lower than expected, the City heard from target groups in greater numbers than usual. Outreach for the CDBG-CV fund amendments included an online survey that was well responded to by low- and moderate-income individuals. For the release of the 2022-23 AAP, the City will use its new LMI contact list to better reach targeted groups, benefitting an estimated 584 residents.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The process used to prepare the Consolidated Plan followed the City's Citizen Participation Plan (attached). While preparing the Annual Action Plan the CPP was also amended to clarify CAPER requirements and other minor changes (details in AP-12). The City's Citizen Participation Plan, which was adopted in March 2012 and amended in 2020 and 2022, guides the development of the Consolidated Plans, Annual Action Plans, and amendments to those plans. The Citizen Participation Plan ensures that the community has the opportunity to work in partnership with the City to identify needs and to allocate CDBG funds. The Citizen Participation Plan established the following standards for citizen involvement:

1. All citizen participation is to be done openly.

2. Involvement of low- and moderate-income persons, minorities, project area residents, elderly, handicapped, and others is to be evident.
3. Reasonable efforts to ensure continuity of involvement of citizens throughout all stages of the CDBG program are to be evident.
4. Timely and adequate information is to be given to citizens.
5. Citizens are encouraged to submit their views and proposals regarding the Consolidated Plan and use of CDBG funds.

Throughout the 2021-22 program year, the City has had frequent discussions with public service providers, housing providers, Salt Lake County, other local municipalities, regional agencies, residents, and City departments. These discussions have informed the preparation of the AAP.

A public hearing was held on September 7, 2021, to address community needs and a second public hearing was held on April 5, 2022.

The 2022 Annual Action Plan and Citizen Participation Plan were available for review during a public comment period from March 22, 2022, through April 21, 2022. The AAP and Citizen Participation Plan were available at City Hall, on the City's website, and by request.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Comments received will be added after the meeting.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

## **7. Summary**

While modest funding amounts limit project types, the City is confident that the 2022-23 allocation of CDBG funds will be used to effectively address needs and benefit residents.

**PR-05 Lead & Responsible Agencies - 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	SOUTH JORDAN	
CDBG Administrator	SOUTH JORDAN	Executive Department
HOPWA Administrator		
HOME Administrator		
HOPWA-C Administrator		

Table 1 – Responsible Agencies

**Narrative**

South Jordan City has administered the Community Development Block Grant (CDBG) program since becoming a grantee for CDBG funds in 2012. The City's Finance Department is responsible for oversight of the program. The CDBG Coordinator is responsible for administration of the program, including preparation of plans and reports, processing draw requests, coordination of the City's CDBG Committee, and monitoring subrecipients. The CDBG administration is located in the Executive Department; prior to 2019, the position was in the Planning Division.

The Lead Agency for the Consolidated Plan is Salt Lake County.

Salt Lake County's Community Resources and Development Department is the lead agency for a local Home Investment Partnership Program (HOME) Consortium. South Jordan City joined the HOME Consortium in 2014. The City's CDBG Coordinator represents the City on the Consortium. The City intends to allow the Consortium to administer the City's portion of HOME funds. As the lead agency for the Consortium, Salt Lake County is also the lead agency for the Salt Lake County 2020-2024 Consolidated Plan, which includes the HOME program.

The City does not participate in the Emergency Shelter Grants (ESG) program or the Housing Opportunities for Persons with AIDS (HOPWA) program.

### **Consolidated Plan Public Contact Information**

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Executive Department

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801-446-4357, ext. 2001

## **AP-10 Consultation - 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

South Jordan City first became a grantee for a HUD program (CDBG) in 2012. In many cases, the preparation of the 2012-2017 Consolidated Plan initiated the City's relationship with many housing and public service providers in the region. Like several cities in Salt Lake County, South Jordan lacks service providers located directly in the City. Providers are physically spread throughout the County, providing their unique type of services to residents from all cities in the county. In the following years, the City has worked to build relationships and reach out to others. The City has sought input from many of those agencies in the preparation of this plan. The CDBG Coordinator has significantly increased awareness of South Jordan's program; however, it continues to be an obstacle that South Jordan's CDBG funds are low and the City's LMI population is low. Most providers prefer to spend time in areas where more help is needed. For many, applying for our funds is not a good use of staff time, since there is little return.

**Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).**

The CDBG Coordinator works with providers funded by the City, including regular phone and email communications and reviews of quarterly reports. The City holds two public hearings each year to address the use of CDBG funds, to which all past and present public service providers are invited. During preparation of the recent Consolidated Plan, the CDBG coordinator met with all service providers, sustainably strengthening name recognition and clarity about who leads which program.

In September 2021, Salt Lake County hosted an open house for organizations interested in applying for CDBG funding. South Jordan was one of the few cities that participated. At the open house, the CDBG coordinator was able to make connections with new potential applicants and raise the visibility of the program among non-profits and other organizations.

In managing the CDBG-CV funds, the CDBG coordinator has also increased communication with service providers. The CV grant resulted in new connections being made with the Community Development Corporation of Utah (who is now providing mortgage assistance with CV funds), Suncrest Counseling (a private counseling business in South Jordan now providing mental health services with CV funds). The CDBG Coordinator also attends a monthly non-profit partner meeting, hosted by NeighborWorks of Salt Lake. This regular meeting has enhanced coordination between the City and housing providers.

As a relatively small grantee and receiving a modest amount of CDBG funding, the City has sought to address housing issues through other resources, namely RDA funds. In 2014, the City joined the local HOME Consortium. Participating in the HOME Consortium has introduced the City to a wider range of

housing providers in the community. It has also strengthened the City's relationship and coordination with the County, as the lead agency of the HOME Consortium, and other municipalities in the region, as fellow members of the Consortium. While communication on the HOME program has remained strong, staff turnover at the County has led to few meetings among all members of the consortium, outside of HOME funds.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

There are three Continuums of Care organized in Utah. The local Continuum of Care serves Tooele and Salt Lake County and is overseen by the Salt Lake Valley Coalition to End Homelessness (SLVCEH). It receives approximately \$7.8 million annually from HUD for project funding and collaboration. Salt Lake County provides staffing support to the Salt Lake Valley Coalition to End Homelessness (SLVCEH) whose goal is to establish a strong and effective homeless system structure that:

- Supports a community wide commitment to make homelessness rare, brief, and non-recurring.
- Unites communities and service providers in profoundly new ways.
- Informs funding and policy decisions through a variety of mechanisms, including a report released annually.
- Aligns multiple funding streams for efforts to quickly rehouse homeless individuals and families while minimizing trauma and dislocation caused to homeless individuals, families, and communities.
- Promotes access to and effective utilization of mainstream programs by homeless individuals and families.
- Optimizes self-sufficiency among individuals and families experiencing homelessness
- Reinforces an overall system planning effort which includes all resources, stakeholders, and funding.
- Provides multiple opportunities for client input and feedback.

The SLVCEH convenes eight core function groups (Community Engagement, Client Focus, Crisis Response, Education, Employment, Health and Wellness, Housing, and Legal Rights & Safety) which inform the work of the Steering Committee that fulfills the responsibilities of the Continuum of Care Board. The Coalition is made up of 279 individual members that represent public, private and nonprofit organizations and individuals interested in issues related to homelessness or provide services to those experiencing homelessness.

Since County meetings have decreased in number, South Jordan subscribes to the SLVCEH monthly newsletter to stay on top of opportunities.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The City does not receive ESG funds and does not administer the HMIS program.

**2. Agencies, groups, organizations and others who participated in the process and consultations**

DRAFT



**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Utah Community Action
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs Food Insecurity
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Housing reps have engaged in ongoing discussions as the City has funded rental assistance through RDA and CDBG-CV.
2	<b>Agency/Group/Organization</b>	South Valley Sanctuary
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Victims of Domestic Violence Services-homeless Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	On-going conversations over the course of the current year.

3	<b>Agency/Group/Organization</b>	SALT LAKE COUNTY
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Services-homeless Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	We meet semi-regularly as a consortium and through the HOME committee.

#### **Identify any Agency Types not consulted and provide rationale for not consulting**

Because the number of South Jordan residents served by each agency is low compared to surrounding cities, the City strives to be respectful of the heavy demands being placed on providers currently and primarily uses information communicated throughout the year. Last year, each current provider submitted a statement. To respect their time this year, outreach for this plan happened through regular ongoing discussions with subrecipients and internal discussions with relevant city departments and divisions. No agency has been intentionally overlooked.

## Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Salt Lake County	Continuum of Care plan contains all of the homelessness strategies for the region.
2019 General Plan	City of South Jordan	Plan includes Transportation Master Plan and Housing Plan. Goals align with preserving stable neighborhoods, facilitate growth of safe and well-planned neighborhoods, ensuring well-designed moderate income housing, and enhancing public spaces.
South Jordan Moderate Income Housing Plan	City of South Jordan	This 2019 housing study goes into detail on unit affordability. However it does not include a full analysis of impediments or racial data.
2014 South Jordan Housing Needs Study	City of South Jordan	This housing study, while older than the 2019 one, contains a more full analysis of impediments and was done in conjunction with the County. The study gives more specifics on protected classes and the need for affordable housing.

**Table 3 - Other local / regional / federal planning efforts**

### Narrative

Last year, the Coordinator reached out to all current service providers for a needs statement. Again and again, the theme was affordable housing and increased demand due to COVID. This continues to be the top issue in our City and State. However, the City's CDBG allocation is not a good avenue for addressing affordable housing. The City is doing that through other avenues, primarily RDA funds and involvement on the HOME committee.

In January, the CDBG Coordinator hosted a table at the County CDBG open house. The event was attended by many nonprofits from the region. We made connections with several providers that we did not know prior to the event and strengthened connections with existing ones.

In preparation for the Annual Action Plan, the CDBG Coordinator brought together representatives from the following divisions: City Manager's Office, Finance, Parks, Senior Programs, Planning, Engineering, and Strategic Services. In this big meeting we discussed all possible CDBG projects and new ideas for enhancing the program while limiting administrative burden. Addressing noncompliant ADA ramps in the City remains a top priority. A map of these is included in the attachments.

A secondary topic of discussion was increased demand at our Senior Center. South Jordan is one of two cities in Salt Lake County that manages its own senior center; in other cities, the County provides senior services. During lockdown, we shifted to a drive-through meal pick-up at a time when other cities' centers were closed completely. This new service option has resulted in more regular customers for the senior center who now come to our in-person activities since we've reopened. Prior to 2020, the senior center was steadily increasing in demand for services; though 2020 shut down some operations for a time, we are seeing a rebound that suggests future demand will continue to increase. This AAP does not have any activities to directly address seniors, excepting our wider accessibility efforts. This new data on our senior center will continue to inform our activities as we watch where trends go in the next year.

DRAFT

## **AP-12 Participation - 91.401, 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

Community participation efforts for the Con Plan and amendments for CDBG-CV continue to inform the AAP. In Oct. 2020, the City surveyed residents about COVID's effects, awareness of current service providers, and uses of CDBG-CV funds. Mental health is a top concern among respondents, mirroring the 2020 Con Plan community survey. This is why outreach was made to bring in more mental health public service applicants. In the 2020 Con Plan survey, residents listed sidewalk improvements as a top concern, and mental health services ranked in the top for services. Activities addressing both these issues are included in this year's AAP.

In the Oct. 2020 survey, the most troubling finding was that respondents said they didn't know where to find help in the City. Based on this, the City has increased marketing of the services available through CDBG. Over the past year, the City's communications team, in partnership with the CDBG Coordinator, released the following:

- 4,900 postcards advertising services were sent to all residential addresses in our LMI areas.
- Three email newsletters were sent to residents in our LMI areas (56% or higher open rate) advertising services and the CAPER. One email newsletter was sent to potential subrecipients advertising applications being open.
- Ten social media ads about services
- An article on the CDBG program appeared in the print and online editions of the January city newsletter.
- The CDBG Coordinator sent information on the CDBG program to seven local churches.
- Seven posters were put up around the City.

A public hearing was held on Sept. 7, 2021, to address community needs and a second public hearing for needs and the AAP was held on April 5, 2022. The 2022 AAP and CPP were available for public comment from March 22, 2022 through April 21, 2022. The AAP and Citizen Participation Plan were available at City Hall, on the City's website, and by request. Notices for the public hearings and public comment period were published in the two largest regional newspapers, at City Hall, emailed to public service and housing providers, posted on the City's social media and website, sent in the citywide enewsletter, and in the CDBG newsletter. A press release was also sent to local media contacts.

At the April 5 hearing, the Council approved two amendments to the Citizen Participation Plan. First, the CPP had outdated City Hall hours. The CPP text was corrected to refer more generally to an updated source. Edits were also made throughout to indicate that in addition to hard copies, the plan would be available online.

Second, the language in the CPP implied a 30-day comment period for both plans and accomplishment drafts. There was contradictory language that listed both a 30-day and a 15-day public comment period for the CAPER. HUD requires only a 15-day public comment period for the CAPER. See 24 CFR 91.105(d)(1) under “Performance reports” which reads, “The citizen participation plan must provide a period, not less than 15 days, to receive comments on the performance report that is to be submitted to HUD before its submission.” Language was corrected and clarified to reflect this.

For the approval of the 2020 CAPER, the 30-day public comment period was followed. The 15-day comment period will take effect with the 2021 CAPER to be submitted in the fall of 2022. These amendments were made in accordance with the CPP, which requires amendments to be reviewed and approved by the City Council in a City Council meeting, which was completed on April 4 date. Notice of the amendments was published along with the public hearing notices.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Meeting	Non-English Speaking - Specify other language: translation available upon request Persons with disabilities Non-targeted/broad community	1 comment was submitted	Resident asked to use funds to explore water development and conservation.	The City has a water conversation program already and is using more suitable funds (not CDBG) to address these issues.	
2	postcards to LMI areas	LMI areas	4,900 postcards advertising services were sent to all residential addresses in our LMI areas.	N/A	N/A	
3	Internet Outreach	Non-targeted/broad community LMI areas	3 email newsletters sent citywide and to LMI area residents	N/A	N/A	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Newspaper Ad	Non-targeted/broad community	Public notices printed in two regional newspapers for Sept. 7 hearing and the April 5 hearing.			
6	Email outreach to all local churches	Non-targeted/broad community	Contacted all local churches to advertise available services	N/A	N/A	
8	Printed posters	Minorities Persons with disabilities Non-targeted/broad community	Printed posters advertising services hung in local libraries, grocery stores, etc.	N/A	N/A	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
9	Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: translation available</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p>	<p>This will be updated after the April 5 hearing.</p>			

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

The City participates in both the CDBG program, as a grantee, and the HOME program, as a member of the Salt Lake HOME Consortium. The 2022 program year marks the City's eleventh year as a CDBG grantee and the eighth year as a member of the HOME Consortium. The City does not anticipate directly administering HOME funds during the duration of this plan. Due to the limited amount of HOME funds expected to be available to the City and in support of the City's desire to support regional housing and homelessness efforts, it is anticipated the City will reallocate any available HOME funds to the Consortium for administration. The City does not participate in other HUD programs.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1			Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	220,000	0	0	220,000	The City estimates it will receive \$220,000 annually for the next 2 years of the Con Plan.

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The City does not have match requirements of the program funding or anticipated projects funded to serve community needs. The design and preparation of all of our infrastructure improvement projects are done by the City's Engineering department; this staff time is paid for by the City rather than CDBG. As indicated, affordable housing and other housing-related projects will be completed using the City's RDA fund, due to its size rather than the City's CDBG grant. The funded public service subrecipients are agencies that serve the region. Funds provided by the City's CDBG grant to these organizations are leveraged by other municipalities, Salt Lake County, the State, other Federal grants, and charitable donations through these organizations.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The City's Senior Center will continue to be essential to meeting needs identified in this plan. Additionally, it is expected that projects to address improvements and amenities will be built on City-owned property, such as sidewalks, open space, and parks, in neighborhoods that qualify for funding through the low- and moderate-income area benefit national objective.

**Discussion**

See above.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Support services for vulnerable populations	2020	2024	Homeless Non-Homeless Special Needs		Essential needs services Family & individual crisis services & prevention Homeless services & prevention Services for those experiencing domestic violence	CDBG: \$23,500	Public service activities other than Low/Moderate Income Housing Benefit: 22 Persons Assisted Homeless Person Overnight Shelter: 25 Persons Assisted
2	Support mental health programs and resources	2020	2024	Non-Homeless Special Needs		Essential needs services Family & individual crisis services & prevention Mental Health	CDBG: \$3,000	Public service activities other than Low/Moderate Income Housing Benefit: 112 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Support training, prevention & education programs	2020	2024	Homeless Non-Homeless Special Needs		Family & individual crisis services & prevention Services for those experiencing domestic violence Training, prevention, and education programs	CDBG: \$3,000	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted
4	Correct accessibility deficiencies	2020	2024	Non-Housing Community Development		Neighborhood improvements Remove barriers to accessibility	CDBG: \$146,500	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 80 Persons Assisted

Table 6 – Goals Summary

## Goal Descriptions

1	Goal Name	Support services for vulnerable populations
	Goal Description	The City seeks to support agencies that provide essential services to residents in need. The funding included for this goal during the 2022-23 program year includes the following public service activities: the Road Home, South Valley Sanctuary, and the INN Between.
2	Goal Name	Support mental health programs and resources
	Goal Description	Mental health services were requested by our residents in community surveys. The City is working with a local clinic that serves LMI individuals to provide mental health services: Community Health Centers.

<b>3</b>	<b>Goal Name</b>	Support training, prevention & education programs
	<b>Goal Description</b>	The Legal Aid Society of Salt Lake provides residents experiencing domestic violence with legal help obtaining protective orders; this activity is a type of preventative measure.
<b>4</b>	<b>Goal Name</b>	Correct accessibility deficiencies
	<b>Goal Description</b>	This year, the City will upgrade ADA ramps to correct accessibility deficiencies.

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

As a relatively small CDBG grantee, the City maintains a simple program. The City intends to maximize the allowable funding (15%) for public services and 20% for planning and administration.

The 2021-2022 AAP was released for public comment on March 22, 2022, prior to HUD's announcement of official grant allocation amounts. Because of this, amounts listed for projects and activities in the version of the plan for public comment were based on an estimated \$220,000 grant allocation (determined based on the City's past allocations). After HUD announces final allocations, the CDBG Coordinator will adjust the estimated amounts according to the following contingency plan before submitting the plan to HUD for approval:

- If the grant amount is higher than \$220,000, the final amount of admin and planning will be adjusted to remain at 20% of the total grant amount, public service amounts will stay as originally allocated, and the remaining funds will be allocated to the ADA ramp activity under the Infrastructure Improvement project.
- If the grant amount is lower than \$220,000, all activities will be adjusted based on the following percentages.
- The final amount for infrastructure improvements will be at least 67% of the total grant.
- The final amount for admin and planning will remain at 20% of the total grant amount.
- The final amount for public services activities will be decreased proportionally from their amounts in this version of the plan. However, no public service activity will be granted more than the maximum or less than the minimum amounts they requested in their applications.

#	Project Name
1	Public Services (2022)
2	Infrastructure Improvements (2022)
3	Administration & Planning (2022)

**Table 7 – Project Information**



### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

As usual, funding requests for the 2022-2023 program year exceeded CDBG funds to be received by the City. The biggest obstacle is that Utah's greatest need is affordable housing, yet South Jordan's small CDBG grant is not enough to tackle this issue. This is why the City is using RDA funds to meet this need.

Another obstacle is that construction costs have increased dramatically. Our latest round of bids for ADA ramps came back at triple the cost of past years. This means that each year, the funding covers fewer and fewer items. Despite increased costs, this activity is the best match of funding type and city needs.

The Staff Working Group has the responsibility to review funding requests and make allocation recommendations to the City Council. The committee discussed the above considerations and scored each application on the eight criteria used each CDBG year, including consistency with the goals of the Consolidated Plan, the number of residents projected to benefit, the type and scale of the project, and the capacity of the organization to carry out the project. The highest scoring applications were selected. All recommended activities have been determined to be eligible for use of CDBG funds and beneficial to South Jordan residents.

**AP-38 Project Summary**  
**Project Summary Information**

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Project Summary Information					
N o.	Project	Goals Supported	Geographic Areas	Needs Addressed	Funding
1	Public Services (2022)	Support services for vulnerable populations Support mental health programs and resources Support training, prevention & education programs		Family & individual crisis services & prevention Homeless services & prevention Services for those experiencing domestic violence Training, prevention, and education programs Mental Health	CDBG : \$29,500
	Description	This project will include all public services funded during the 2022-23 program year.			
	Target Date for Completion	06/30/2023			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Based on the applications by subrecipients, a total of 209 individuals are expected to benefit from the proposed activities. South Jordan's average household size is 3.5; however, homeless services like the Road Home and the INN Between are expected to serve individuals more often than families seeking services. Excluding those services, the remaining 192 expected beneficiaries represent an estimated 57 families.			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	All public services will be given at the subrecipient's location.			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Homeless shelter and services (Road Home: \$8,000), Matrix Code 3T.  Domestic violence victim shelter and services (South Valley Sanctuary: \$10,000), Matrix Code 5G			

	Domestic violence victim legal support services (Legal Aid Society: \$3,000), Matrix Code 5G. Mental health services (Community Health Centers: \$3,000), Matrix Code 5O. Homeless end of life and medical respite housing (INN Between: \$5,500), Matrix Code 3T.			
	Infrastructure Improvements (2022)	Correct accessibility deficiencies	Neighborhood improvements Public infrastructure improvements Remove barriers to accessibility	CDBG : \$146,500
	Description	The purpose of this project is to provide infrastructure improvements throughout the City. The primary activity will be upgrading ADA ramps in the City.		
	Target Date for Completion	06/30/2024		
2	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Based on past accomplishments from ADA activities and adjusting for rising construction costs, it's estimated that 80 residents with disabilities will be served.		
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Locations will be determined before the bidding process. A map of ramps needing to be updated is included in the attachments.		
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	ADA Ramp Replacements (\$146,500), Matrix Code 3L		
3	Administration & Planning (2022)	Support services for vulnerable populations Support mental health programs and resources	Essential needs services Family & individual crisis services & prevention Homeless services & prevention	CDBG : \$44,000

Annual Action Plan  
2022

30

	Support training, prevention & education programs Correct accessibility deficiencies		Neighborhood improvements Public infrastructure improvements Remove barriers to accessibility Services for those experiencing domestic violence Training, prevention, and education programs Mental Health Economic recovery from COVID-19	
Description	This project includes expenses related to program administration of the CDBG program and eligible planning activities. Funds will be used to support employee costs of providing admin and eligible planning activities. Admin funds will also be used for training, travel, public notices and other advertising costs, and ZoomGrants fees.			
Target Date for Completion	06/30/2023			
Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	HUD assumes for admin and planning activities that LMI residents are benefited in the same proportion as other activities.			
Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)				
Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	<p>The City intends to use the full 20% of its grant for planning and admin. Funds may be shifted between the two activities to meet needs.</p> <p>Program Administration, Matrix Code 21A, \$5,000</p> <p>Eligible Planning, Matrix Code 20, \$39,000</p>			

## **AP-50 Geographic Distribution - 91.420, 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

HUD has granted an area benefit exception to the City each year since 2014. The 2019 exception allows projects to qualify for the low- and moderate-income national objective in Census block groups where at least 23.62% of the residents are low- or moderate-income. The following block groups have been determined to be eligible at the time that the Consolidated Plan was prepared:

- Tract 1128.17 Group 2, LMH 38.63%
- Tract 1130.10 Group 1, LMH 29.82%
- Tract 1130.10 Group 3, LMH 35.78%
- Tract 1130.11 Group 3, LMH 26.87%
- Tract 1130.07 Group 1, LMH 28.47%

No particular target areas have been identified for this year's activities. Locations for the ADA ramps will be selected based on available funding and will be chosen prior to the bidding process.

### **Geographic Distribution**

Target Area	Percentage of Funds

Table 8 - Geographic Distribution

### **Rationale for the priorities for allocating investments geographically**

No allocations were done based on geography.

### **Discussion**

The City Engineering Division has identified 1,184 ADA ramps throughout the City that need to be upgraded, including some that are not owned by the City. Since project funding amounts and bids affect which areas can be completed, the set of ramps to be upgraded will be determined when the project goes out to bid. It is expected that in addition to benefiting those with disabilities, ADA ramps upgrades benefit low and moderate income areas as well. To date, about half of the LMI areas have been brought into compliance. Maps of the LMI areas and ramps needing updates are attached to the plan.

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## **AP-75 Barriers to affordable housing -91.420, 91.220(j)**

### **Introduction**

Because the City receives a small CDBG allocation, affordable housing efforts are funded through the RDA. These efforts are detailed in AP-85. Efforts to impact public policies are listed here.

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

Per Utah Code, cities must annually update 5-year estimates of moderate-income housing needs and then review and report these findings to the State. The City's full report given to the State is included in the attachments. As reported, South Jordan is undertaking several strategies, detailed here.

1. The City is implementing and publicizing the City's recently amended Accessory Dwelling Unit (ADU) ordinance, which outlines clearer requirements for ADUs and allows for greater flexibility. Improving the ADU ordinance have been a top priority for city staff for the last two years. Now that the new ordinance has passed, efforts are now underway to provide an illustrated guide for residents to answer questions and apply the ordinance consistently.
2. On February 2, 2021, the City Council approved an amendment to the General Plan to include a plan for two subareas. One of the areas included in the plan is the Jordan Gateway area, which includes a FrontRunner station and one bus line. This subarea plan proposes allowing additional housing in this area and repurposing existing parking lots for additional development. This subarea plan will be implemented in the zoning code and will inform development proposal in the area. The City also has ongoing discussions about development opportunities in the town center area of the Daybreak community, which is entitled to build a variety of housing types (apartments, condominiums, and other attached housing and small-lot residential) along the existing TRAX Red line. Several housing projects are currently planned or under construction in the town center. The Daybreak community also has new owners, the Larry H. Miller Group, and there has been a renewed effort over the last year to discuss plans and explore ideas and partnerships that will have an effect on affordable housing.

The City is reducing parking requirements for transit-oriented development. The City has prioritized discussion and planning efforts in TODs,

Annual Action Plan  
2022

34



including near the TRAX red line in Daybreak, and the FrontRunner station in the City’s Jordan Gateway area. Parking requirements for each development in these areas is analyzed and progress toward achieving the goals is evident in the successful developments that are occurring in these areas.

## **Discussion**

According to the 2014 Analysis of Impediments, South Jordan’s affordable housing shortage is particularly problematic for larger households, particularly minority households which tend to have larger household sizes. The report also notes that non-Hispanic white and minority homeownership rates were fairly similar in 2000 (90 and 86 percent, respectively). In 2010, that gap had widened with whites at 86 percent and minorities at 76 percent homeownership. While addressing the first problem is made difficult by developers and the price of land, the City hopes its Down Payment Assistance Program can address the second issue.

Since 2017, the City is approving more ADU applications each year, possibly due to a combination of the City’s emphasis on improving ADU regulations and renewed interest in home improvements during 2020.

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

Due to the amount of CDBG funds and current City demographics, the City maintains a simple CDBG program and meets most needs using funds other than CDBG.

### **Actions planned to address obstacles to meeting underserved needs**

Limited funding and high housing costs are primary obstacles to addressing underserved needs through CDBG. The City will continue to seek programs and activities to more efficiently meet community needs through leveraging funds, better coordination with and awareness of local organizations, and seeking to meet needs with resources other than CDBG funding. Increased marketing efforts are being made to make more residents with needs aware of the services funded by CDBG. Postcards and an enewsletter were distributed to LMI neighborhoods; posters have also been hung around the City. This year, we have also focused on public services with an established pipeline of LMI residents.

### **Actions planned to foster and maintain affordable housing**

As the population and number of households continue to rise, the City will have a greater need to provide housing that meets the needs of residents and those interested in moving to the City. According to the City's 2019 Moderate Income Housing Plan, the current shortage plus that additional need each year means that (assuming current distributions of household incomes) the City will have a need of 10,370 affordable housing units by 2024. Just five years ago the City had an excess of affordable moderate-income housing, but—despite best efforts by the City—housing affordability is a major statewide issue presenting challenges for all communities.

Since the City receives a small amount of CDBG funds, the City has chosen to tackle affordable housing through other means.

In 2019, the City partnered with Ivory Homes to use RDA funds to provide affordable, deed-restricted units in a new neighborhood along a major transportation corridor (11400 S). The resulting Bingham Court development is now completed and being leased. The development includes nine units designated as workforce housing that are deed-restricted to low- and moderate-income families. The nine units have now been sold to a mix of qualified city and school district employees.

In November 2020, the City opened its Down Payment Assistance program to employees, using funds set aside for moderate-income housing from the RDA. The program is now open to anyone qualifying as low- and moderate-income. The goal of the DPA is to expand homeownership opportunities for eligible low- and moderate-income households and to increase home ownership within the City. The Program seeks to give assistance to households who otherwise would not be able to become homeowners, while ensuring home ownership as a successful long-term goal. This helps improve the quality of life for

families and the quality of the community. Five of those who purchased homes in the Bingham Court Workforce Housing also used the DPA.

Now that funds for the CDBG-funded home repair program have been spent, the City is preparing to open an internally managed home repair program funded by the RDA. The program will serve LMI families and provide critical home repairs and accessibility modifications allowing participants to stay in their homes. Using RDA funding will allow for more flexibility in the spending of funds and better serve our LMI population without a timeliness deadline.

The City plans to continue using RDA funds rather than CDBG to pursue affordable housing.

### **Actions planned to reduce lead-based paint hazards**

According to the Housing Plan, the City has 21,839 units. Of these, the Department of Environmental Quality reports 2,601 units built prior to 1978, representing 12% of the City's housing stock. Lead-based paint is not considered a widespread concern in the City. For similar reasons, the Salt Lake County Health Department has discontinued testing and mitigation programs. The Health Department is now focused on education. It is recommended that city residents in housing units built prior to 1978 become familiar with the dangers of lead-based paint and actions that can be taken to reduce those hazards. Information is available from the Salt Lake County Health Department.

As the City launches its new RDA home repair program, homes will be subject to meeting lead-based paint safety requirements.

### **Actions planned to reduce the number of poverty-level families**

The goals of the Consolidated Plan were created to support the underlying objectives of the City's CDBG program, specifically the objective to support family and individual stability, self-reliance, and prosperity. In order to meet that objective, preferred public services serve essential immediate needs and provide case management and coordination with other agencies to assist families and individuals to achieve long-term stability. The City strives to fund its full 15% allotment for public services each year. Relatively speaking, poverty rates are low in South Jordan; 2.7% of the City population, an estimated 1,948 persons, live below the poverty level (ACS 2019 5-year estimates, Poverty Status in the Past 12 Months). Supporting limited clientele services through trusted subrecipients helps us target individuals and their needs.

### **Actions planned to develop institutional structure**

The City is constantly striving to most effectively utilize limited CDBG funds to address community needs. We have increased marketing efforts over the past two years to increase recognition of our subrecipients and their ties to the City. Among City departments and divisions, awareness of the CDBG program and how it can be used is also growing, thanks to outreach efforts by the CDBG Coordinator.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

The CDBG Coordinator will continue to serve on the HOME Consortium and coordinate with housing providers. In addition, the coordinator will continue to attend the monthly nonprofit coordination meeting sponsored by NeighborWorks.

### **Discussion**

See above.

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## Program Specific Requirements

### AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)

#### Introduction

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

## Discussion

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## **Exhibit “B”**

### Updated Citizen Participation Plan





CITY OF SOUTH JORDAN, UTAH  
CITIZEN PARTICIPATION PLAN

April 2022

City of South Jordan

1600 W. Towne Center Drive (10610 S.), South Jordan, Utah 84095 (801)-446-4357

## **The Citizen Participation Plan Requirement**

This document constitutes the Citizen Participation Plan for the City of South Jordan's Consolidated Plan. South Jordan's Citizen Participation Plan (CPP) describes how citizens will participate in three programmatic areas:

1. Development of the Consolidated Plan,
2. Substantial amendments made to the Consolidated Plan, and
3. Development of the annual performance report (CAPER).

This CPP sets forth the City of South Jordan's policies and procedures for citizen participation for the use of Community Development Block Grants (CDBG) funds. The Citizen Participation Plan provides an opportunity for the community to work in partnership with the City to identify needs and to allocate CDBG funds.

The City of South Jordan holds the following standards regarding citizen involvement:

1. All citizen participation is to be done openly.
2. Involvement of low- and moderate-income persons, minorities, project area residents, elderly, handicapped and others is to be evident.
3. Reasonable efforts to ensure continuity of involvement of citizens throughout all stages of the CDBG program are to be evident.
4. Timely and adequate information is to be given to citizens.
5. Citizens are encouraged to submit their views and proposals regarding the Consolidated Plan and use of CDBG funds.

While the Citizen Participation Plan will aim to ensure the participation of all residents, special assurances will be made to ensure the participation of the following groups:

- extremely low-, low-, and moderate-income persons;
- persons living in areas where CDBG funds are proposed to be used;
- residents of publicly assisted housing;
- low-income residents of target neighborhoods;
- minorities;
- non-English speaking persons; and
- persons with physical disabilities.

As required by law, the Citizen Participation Plan adheres to guidelines provided by the U.S. Department of Housing and Urban Development (HUD), 24 CFR Part 91.105, in order to qualify for participation in the Community Development Block Grant Program (CDBG).

## **Citizen Participation Plan Development Process and Adoption**

The Consolidated Plan process begins with issuing the Citizen Participation Plan (CPP) which describes the Plan Development Process. The CPP informs the public about processes

and procedures for public access and influence on the Consolidated Plan and Annual Action Plans, and the proposed scheduling for development and submission of the plan.

Copies of the CPP are made available at least 2 weeks prior to the first public hearing at the City of South Jordan City Hall, selected community based organization offices, and on the City of South Jordan's website: <http://sjc.utah.gov/>. The CPP is also made available during the review of the Consolidated Plan.

Prior to the adoption of the Citizen Participation Plan, implementation of the following public comment, review, and adoption procedures ensure that all citizens have a chance to participate in development of the Plan.

1. The City will provide a notice of the 15-day public review period for the Citizen Participation Plan in the legal section of *The Salt Lake Tribune* and *The Deseret News*.
2. The proposed Citizen Participation Plan will be available for public review at the City of South Jordan City Hall, the City of South Jordan Community Center, and the City of South Jordan website at <http://sjc.utah.gov/>.
3. Upon request, the Plan will be made accessible to any person with disabilities. The City will provide a reasonable number of free copies of the Citizen Participation Plan to citizens and groups that request copies.
4. Comments or views of citizens received in writing during the public review period will be solicited by the City of South Jordan staff. Comments can be sent to the CDBG Coordinator by email (see [sjc.utah.gov/CDBG](http://sjc.utah.gov/CDBG) for current email address) or in writing to the CDBG Coordinator, 1600 W. Towne Center Dr., South Jordan, Utah 84095, or by calling 801-446-4357.
5. The Final Plan will include a summary of public comments and a summary of any comments not accepted and the reasons therefore, all of which will be attached to the final Citizen Participation Plan.

### **Amendment of the Citizen Participation Plan**

The City will amend its approved Citizen Participation Plan whenever a change in the public participation process, as outlined in this plan, is proposed. An amendment to the approved Citizen Participation Plan will be reviewed by the City of South Jordan City Council in a City Council meeting and approved by the Council. Notice of any amendment to the Citizen Participation Plan will be published in the *Salt Lake Tribune* and *The Deseret News* no less than 15 days prior to the review and adoption to allow the public the opportunity to review and comment on the amendment. Appeals concerning the amendment should follow the Appeal procedures outlined in this document.

### **Consolidated Plan Development Public Process**

The CPP includes a vigorous effort to notify the Salt Lake County Housing Authority and other government agencies as well as the affected public about the Plan Development

Process and to provide ample opportunity for citizen input at all stages. In the course of developing the Consolidated Plan, there is a public hearing and a 30-day, open comment period during the drafting stages before the document is finalized and submitted to HUD.

The Consolidated Plan development process consists of the following steps:

- Preparing and issuing (or reissuing) the Citizen Participation Plan with Notice of the Consolidated Plan and Annual Action Plan Public Hearing,
- Preparing and issuing a draft proposed Five-Year Plan (if a new 5-Year Plan must be developed), and/ or a draft proposed Action Plan for the current fiscal year,
- Submitting the final proposed Consolidated Plan and Annual Action Plan to the City Council for approval,
- Finalizing the Consolidated Annual Action Plan, and
- Submitting the Consolidated Annual Action Plan to HUD prior to the May 17th annual deadline.
- If necessary, the Annual Action Plan may have to be amended in order to reallocate funding or modify program language. If the amendment is considered substantial (the criteria are outlined later in this document), a formal amendment will be proposed, considered, and acted upon;
- At a second public hearing at the end of the performance year, the Consolidated Annual Performance Evaluation Report (CAPER) will be addressed. After the completion of the program year, a CAPER will be drafted and submitted to HUD.

#### **PLAN DEVELOPMENT SCHEDULE\***

<b>EVENT</b>	<b>DATE</b>
Issuance of Citizen Participation Plan with Notice of Hearing	February - March
Publication of proposed Consolidated Plan and Action Plan	April
Public Hearing on proposed Action Plan & Budget	April
Finalization of Action Plan	April -May
Submission of Action Plan application to HUD	May

\*Specific dates and locations are provided in published Notices, through direct mailings, in publicly accessible locations, and on the City of South Jordan website.

#### **Public Notice**

There shall be advanced public notice once a federally required document is available, such as the Proposed Annual Action Plan or Five-Year Consolidated Plan, any proposed

Substantial Amendment to the Action Plan or Consolidated Plan, and the Consolidated Annual Performance Evaluation Report (CAPER).

In addition, there shall be advanced public notice of all public hearings relating to the funds or planning processes covered by this Citizen Participation Plan.

### **Forms of Public Notice**

1. Any activity requiring public notice will be placed on the City's web page at <http://sjc.utah.gov/>.
2. Newspapers of General Circulation: Public notices will be published as notices in the legal section of *The Salt Lake Tribune* and *The Deseret News* at least 15 days before the date of a hearing.
3. Press Releases will also be distributed to the local media.
4. Notice will be given to organizations that may receive funding from or who have collaborated with the City of South Jordan in the past, neighborhood organizations, and any other parties on our mailing list. The list includes but is not limited to: public and private agencies that provide housing, health, and social services including those that provide services to children, elderly, disabled, persons living with HIV/AIDS, and the homeless; public and private agencies that represent minority groups living in the City of South Jordan; organizations representing non-English speaking citizens in the City of South Jordan; and other interested parties.
5. Notice will be posted on the public bulletin board outside the City Council Chambers.
6. Notice will also be given to any person or group that requests information.

### **Public Hearings**

The City will conduct public hearings at locations and at times that are convenient to the public, especially for those persons affected by program resources, and the locations will be equipped to accommodate persons with physical disabilities. As such, all public hearings and meetings will be conducted at City Hall, 1600 W. Towne Center Drive (10610 S), South Jordan, UT, 84095.

For non-English speakers, Spanish translation will be available at all public hearings if requested three (3) days prior to the hearing date. Other requests for reasonable accommodation (such as sign language) must be made three (3) days prior to the hearing date and the City will provide appropriate assistance to the extent feasible. Residents should call (801) 254-3742 to request translation or other reasonable accommodations.

### **Public Access and Accommodation**

The City of South Jordan facilitates broad-based participation in its planning process by providing:

- No less than two-week advance publication of a Notice of Public Hearings,
- A review period of no less than 30 days for plan drafts and 15 days for CAPERs,
- Two-week periods following hearings for the submission of additional comments,
- Mailings of Notices to a wide range of interested groups,
- Easy access to draft documents (hard copies and on-line) and hearing transcripts,
- Accommodation of special needs participation through sign-language interpreters and interpreters for Spanish-speaking constituents, and
- Holding hearings at convenient times and in barrier-free facilities that are easily accessible by public transportation.

## **Development of The Consolidated Plan**

### ***A. Identifying Needs***

The critical first step in a collaborative effort to address the City's housing and community development programs and goals is to reach an agreement on the City's priority needs.

**Gathering Input on Housing and Community Development Needs:** The City of South Jordan will actively solicit and encourage input from citizens on needs within the community. The City will especially encourage participation from low- and moderate-income residents where housing and community development funds may be spent. Input will be sought from all residents and low- and moderate-income residents, public housing residents and Section 8 voucher holders, minorities, seniors and other special needs populations through the use of a web-based survey instrument identifying top community needs. This survey will be available on the City website, and distributed widely to local housing authorities, community and neighborhood groups, nonprofit agencies and service providers, philanthropic organizations, the Salt Lake County Continuum of Care, community and faith based organizations. Paper surveys will be provided to those without computer access. The survey will be advertised on the City website, through community groups and service providers, and in *The Deseret News* and *Salt Lake Tribune*.

The City will also conduct a series of interviews with agencies that provide services and housing for special needs and low-income populations on the needs of their clients. These include adjacent local governments, economic development interests, and state and local health agencies. The City will consult private agencies that provide health services, social services for children, elderly, disabled, homeless, persons with AIDS, victims of domestic violence, and persons with alcohol/drug abuses, etc.

All of the groups, populations, and agencies mentioned above will be encouraged to participate in the Public Hearing held to discuss the proposed strategies and actions in the draft Five Year Consolidated Plan and Annual Action Plan.

### ***B. The Proposed Action Plan (and/or Five-Year Consolidated Plan)***

The Consolidated Plan consists of three parts: the needs assessment, housing and

community development strategic plan, and an action plan. The Consolidated Plan identifies the housing and community development needs in the City, prioritize the needs for funding, and prescribes a comprehensive strategy for addressing the needs. To maintain relevance, an annual One-Year Action Plan is developed which includes the following elements:

- Dollar amounts proposed for each activity
- A description and location of each activity
- The entity responsible for implementation of each activity
- Time frame for each activity

In all cases, the Consolidated Plan and Action Plan seek to minimize the displacement of residents from their homes or places of business.

Three groups involved in the process of Consolidated Plan and Action Plan development include:

- Citizens and Agencies Contacted During the Consolidated Plan Process
- Staff Working Group
- City Council

**Citizens and Agencies Contacted for Input During the Planning Process** - See above.

**Staff Working Group-** Coordinated through the City Manager's Office, the working group will be comprised of representatives from the various City departments responsible for HUD-funded programs/projects, including Finance, Planning, Seniors and the Community Center, and the City Manager's Office. The group will perform in an advisory manner to the City Council concerning planning, implementing and assessing the CDBG program and activities through the following:

- Collecting citizen input concerning neighborhood/ community needs;
- Preparing a prioritized list of neighborhood/ community needs for review during the preparation of the Consolidated Plan and Annual Action Plan;
- Preparing project recommendations for review by the City Council and for the Council's final approval; and
- Reviewing project/program progress.

**City Council** - The City Council will fulfill its role by holding public hearings and carrying out the procedures established in this Citizen Participation Plan. The City Council makes the final determination about the priority of various community needs that will guide the Council when annually allocating CDBG funds in the Action Plan.

***C. Public Hearing and Comment Period on the Proposed Five Year Consolidated Plan, Annual Action Plan and the CAPER***

1. **Public Notice - Proposed Five Year Plan, and / or Annual Action Plan Hearing:** The City will give notice of a public hearing on the Proposed Five Year Consolidated Plan and Action Plan to be held in April, providing 15 days' advance notice. The notice will follow the guidelines set out in the "Public Notice" section of this Citizen Participation Plan. The public hearing notice shall include a summary of the contents and purpose of the Action and/or Consolidated Plan and shall include a list of the locations where copies of the entire proposed plan may be examined.
2. **Public Review - Proposed Five Year Plan and/or Annual Action Plan:** During the 30-day public comment period, copies of the proposed Action Plan and/or Consolidated Plan will be made available for public review online, at City Hall, and at the Community Center. Reasonable accommodations will be made for non-English speaking persons and for people with disabilities. The City of South Jordan shall provide a reasonable number of free copies of the Action and/or Consolidated Plan to citizens and groups upon request.
3. **Public Comments - Proposed Five Year Plan and/ or Annual Action Plan:** The public may comment on the Action Plan and/or Consolidated Plan in writing or at the public hearing. Comments can be sent to the CDBG Coordinator by email (see [sjc.utah.gov/CDBG](mailto:sjc.utah.gov/CDBG) for current email address) or in writing to the CDBG Coordinator, 1600 W. Towne Center Dr., South Jordan, Utah 84095, or by calling 801-446-4357.
4. The City of South Jordan shall consider any comments or views received during the 30-day public comment period in preparing the final Action and/or Consolidated Plan. A summary of all comments or views, and a summary of any comments or views not accepted (that is, comments or views that do not result in changes) and the reasons thereof, shall be attached to the final Action Plan and/or Consolidated Plan.
5. A public hearing is held by the City of South Jordan to gather public input on the City's annual performance and evaluation report for the last program year. The report analyzes progress toward the goals established in previous plans with regard to the unit of measure for the project, as well as timely completion. This report also provides information on the performance of funded projects in relationship to the program objectives.
6. **Public Notice and Hearing - Annual CAPER Report** - The City of South Jordan will conduct one additional public hearing to allow the public to comment on the annual CAPER Report to HUD, which reports the accomplishments, expenditures, and outcomes of the CDBG program. The City will follow the guidelines set out in the "Public Notice" section of this Citizen Participation Plan. The public hearing notice shall include a summary of the contents and purpose of the CAPER, and shall include a list of the locations where copies of the entire CAPER may be examined.



7. **Public Review- CAPER:** During the 15-day public comment period, copies of the CAPER will be made available for public review online and at City buildings. Reasonable accommodations will be made for non-English speaking persons and for people with disabilities. The City of South Jordan shall provide a reasonable number of free copies of the CAPER to citizens and groups upon request.
8. **Public Comments - CAPER:** The public may comment on the CAPER in writing or at the public hearing. Comments can be sent to the CDBG Coordinator by email (see [sjc.utah.gov/CDBG](http://sjc.utah.gov/CDBG) for current email address) or in writing to the CDBG Coordinator, 1600 W. Towne Center Dr., South Jordan, Utah 84095, or by calling 801-446-4357.
9. The City of South Jordan shall consider any comments or views received during the 15-day public comment period in preparing the final CAPER. A summary of all comments or views, and a summary of any comments or views not accepted (that is, comments or views that do not result in changes) and the reasons thereof, shall be attached to the final CAPER.

***D. The Final Action Plan (and/or Five-Year Consolidated Plan)***

Copies of the final Action Plan and/or Consolidated Plan and the Executive Summary will be made available to the public for free upon request. Copies will also be posted on the City's website.

### ***E. Amendments to the Action Plan (and/or Five-Year Consolidated Plan)***

#### **Substantial Amendment Criteria:**

**Consolidated Plan (Five-Year Strategy)** -The City will amend its approved Consolidated Plan (Five-Year Strategy) whenever a decision is made to propose a substantial change in allocation priorities. For the purpose of the Consolidated Plan, a "substantial change" will constitute a cumulative change equal to or in excess of 25% of the City's CDBG entitlement for a program year.

Changes in funding priority not amounting to more than 25% of a program year will not be considered a substantial change to the Consolidated Plan or Annual Action Plan; no formal amendment to the Consolidated Plan requiring public review and comment will be warranted. (For example, an amendment to the Consolidated Plan is needed if the five-year Strategy identifies only a low priority need for historic preservation, but during the five-year timeframe the City decides to establish a CDBG-funded historic preservation program that amounts to more than 25% of the City's annual allocation.)

**Annual Action Plan** - The City will amend its approved Action Plan whenever one of the following decisions is made

- to carry out an activity not previously described in the Action Plan;
- to cancel an activity previously described in the Action Plan;
- to increase the amount to be expended on a particular activity from the amount stated in the Action Plan by more than 25%; or
- to substantially change the purpose, scope, location, or beneficiaries of an activity.
- Changes in funding for an existing activity (project) not amounting to more than 25% will not be considered a substantial change to the Action Plan; no formal amendment to the Action Plan requiring public review and comment will be warranted

**Comment Period for Substantial Amendments:** A "substantial amendment" is an amendment to the Consolidated Plan or Annual Action Plan that requires 30 days of public comment. Prior to submitting substantial amendments to HUD, the City of South Jordan will provide citizens with 30 days' advance notice - advertised in the publications listed in the public notice section - of an opportunity to comment whenever a substantial amendment is being proposed for the City of South Jordan CDBG program. The City of South Jordan shall consider any comments received in preparing substantial amendments. A summary of all comments received shall be attached to any substantial amendment of the plan. Any comments that are not accepted (that is, comments that do not result in changes to the amendment) and the reasons thereof shall be included in this summary.

## **Allowed Changes During COVID-19**

During the COVID-19 pandemic, the Coronavirus Aid, Relief, and Economic Security (CARES) Act allows for several changes. Per HUD's information, the following provisions apply and override their respective counterparts in this plan while HUD allows them.

- Deadlines for the submission of the FY19 and FY20 Con Plan and Actions plans is extended to August 16, 2021.
- The 15% cap on public services is suspended for FY19 and FY20 CDBG funds.
- Public comment periods for all items herein are decreased to 5-days.
- Virtual public hearings are allowed.

Any forthcoming waivers and changes by HUD during the pandemic and following recovery efforts will be considered to automatically apply to this Plan without requiring an amendment, as long as such changes are in line with the HUD guidelines.

## **Access to Records**

The City of South Jordan shall provide citizens, public agencies and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and the City's use of resources under the CDBG program during the preceding five years (or as many years as the City has been administering the program, if less).

## ***Standard Documents***

Standard documents include copies of the proposed and final Annual Action Plans, the proposed and final Consolidated Plan, proposed and final substantial amendments, the Consolidated Annual Performance and Evaluation Report, the Citizen Participation Plan, as well as information regarding use of funds and other program information will be maintained by City of South Jordan staff.

## ***Availability to the Public***

The public may access standard documents by contacting the Finance Department, CDBG Program, City Hall, 1600 W. Towne Center Drive (10610 S), South Jordan, UT, 84095, (801)-446-4357, during current business hours, as posted on the City website. Reasonable accommodation for persons with disabilities will be made upon request. Any interested party may receive copies of standard documents at no cost. Documents may also be downloaded from the City of South Jordan website.

## **Complaints and Grievances**

The City of South Jordan will provide written responses to written complaints and grievances received regarding any aspect of the annual Consolidated Plan federal

entitlement grant program within 15 working days, where practicable, of receiving the complaint or grievance. Comments, complaints, and grievances concerning the Consolidated Plan, Annual Action Plan, or CAPER should be addressed to the Finance Department specifying the CDBG program as the subject of the complaint.

### **Technical Assistance**

Upon request, staff will provide technical assistance to groups representing extremely low, low- and moderate-income persons to develop funding requests for CDBG eligible activities. Technical assistance will be provided as follows:

- Answer, in writing or verbally, all inquiries received from citizens or representative groups relating to funding requests.
- Meet with groups or individuals as appropriate, to assist in identifying specific needs and to assist in preparing request/ application for assistance.
- Provide bilingual translation on as needed basis.

### **Anti-Displacement**

In the event that any residential displacement and relocation must take place in order to carry out a program activity, the City of South Jordan ensures that it will develop an Anti-displacement and Relocation Plan in connection with that project as applicable per Federal regulations.

In the event that any acquisition and relocation must take place in order to carry out a program activity, South Jordan will also comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended and implementing regulations of 49 CFR Part 24.

### **Definitions**

For purposes of the CDBG program, the following definitions will apply:

**Community Development Block Grant (CDBG):** A grant program administered by the U.S. Department of Housing and Urban Development (HUD). This grant allots money to cities and counties for housing rehabilitation, affordable housing assistance, community services, and community development activities (including community facilities and economic development).

**Consolidated Plan (CP):** The Consolidated Plan is a five-year planning document for the CDBG program. The CP must contain a housing and community development needs assessment, a five- year strategic plan to address the needs identified, a one-year action plan to identify specify activities and planned use of CDBG funds. The CP is due at HUD 45 days before the beginning of a program year. The City of South Jordan CDBG program begins annually on July 1, making the CP due at HUD no later than May 17 of each year.

**Consolidated Annual Performance Evaluation Report (CAPER):** CAPER is an annual report summarizing the City's progress in implementing Consolidated Plan. CAPER is due at HUD 90 days after the close of a program year. For the City of South Jordan, each program year ends on June 30, making the CAPER due at HUD no later than September 28 of each year.

**Median Family Income (MFI):** HUD surveys major metropolitan areas annually to develop an index of median family income by household size.

**Low- and Moderate-Income Households** - Pursuant to HUD regulations, the primary beneficiaries of the CDBG and HOME programs should be low- and moderate-income households, defined by HUD as follows:

- ***Extremely Low-Income*** - 0-30% Area median income (AMI) adjusted for household size
- ***Low Income*** - 31-50% AMI adjusted for household size.
- ***Moderate-Income*** - 51-80% AMI adjusted for household size

**Low- and Moderate-Income Neighborhood** - Generally defined as a census tract(s) or block group(s) in which a minimum of 51 percent of the residents have an income not exceeding 80 percent of the area median family income. HUD offers exceptions in some areas, in which HUD determines a new percentage that qualifies. Where such an exception is granted, qualifying areas shall be referred to as low- and moderate-income neighborhoods.

**Slum or Blighted Area** - An area that meets the definition of a slum, blighted, deteriorated or deteriorating area under State or local law, typically identified as Redevelopment Project Areas, or where a substantial number of deteriorating or dilapidated buildings or improvements are present throughout the area.

**Publicly Assisted Housing Developments** - Housing projects (either rental or ownership housing) developed with the assistance of public funds such as HOME, CDBG, and redevelopment set-aside funds.