



SIX COUNTY

ASSOCIATION OF GOVERNMENTS

CDBG Annual Action Plan

For July 1, 2023 - June 30, 2024

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Executive Summary

This plan, prepared by the Six County Association of Governments (SCAOG) Office of Planning, is meant to provide a regional overview of housing and community development priorities with descriptions of resources available to achieve these priorities for program year 2024 (July 1, 2023 - June 30, 2024).

SCAOG is the lead agency in charge of the Community Development Block Grant Program (CDBG) for Central Utah. The region covers Juab, Millard, Piute, Sanpete, Sevier, and Wayne Counties in the State of Utah and 49 communities within these counties.

The objectives of this plan are to:

- Provide a forum of collaboration between community leaders, service providers, and citizens.
- Create a set of one-year goals for Six County AOG to move forward with.
- Provide an annual extension/update of strategies to fit in with the Five-Year Consolidated Housing and Community Development Plan.

The expected outcomes of this plan are to:

- Create a usable and relevant document for community leaders, service providers, and citizens to have a reference when considering local needs for the next year.
- Provide assistance to communities when applying for community and housing grant funding, particularly for the CDBG program.
- Implement projects and goals in order to better allocate CDBG money to the communities in terms of need.
- Aid planning and community assistance projects in allocating funding to individuals and communities in terms of need.
- Aid local leaders and the SCAOG in determining priorities for the future.

Personal interviews are conducted with the elected officials and staff of every jurisdiction on an annual basis. In the past this approach of community visits has allowed officials to speak openly about their concerns and set real goals and priorities for housing and community development.

Citizens and service providers are also invited to share their knowledge of needed infrastructure. This year an email was sent out to municipalities to help collect information on needed infrastructure in the region. Citizens and service providers were also given the opportunity to comment within our 30 day public comment period, as well as during the public hearing. This plan will be available for public comment from January 24, 2023 to February 24, 2023 and a public meeting was held on March 1, 2023 to gather public input on this plan. Comments from this period will be included in this plan.

The objectives and outcomes identified in this plan are derived by input from local government, SCAOG agencies, and citizens. They are listed below.

- Provide safe and healthy affordable housing for low-income individuals, especially those who are disabled.
- Prevent homelessness by offering overnight shelter and rental assistance.
- Improve the quality of life for elderly and disabled individuals.
- Improve infrastructure of jurisdictions with citizens that primarily make a low-moderate income.

Outreach

SCAOG takes three approaches to involve organizations in the creation of the Annual Action Plan:

- Visit elected officials and staff in their own municipality every March. Collect a list of Capital Improvements and other projects. This is during the planning process.
- Consult Service Providers about local needs during the planning process.
- Consult with the SCAOG Housing and Community Action Programs (HCAP) department during the planning process.
- Seek input from the above-mentioned organizations for comment and revisions during the public comment period.
- Hold a public hearing for the plan.

Table 1: Past and Current Consultation of Agencies and Jurisdictions

Organization Consulted	Result of Consultation
Service Provider’s Council	Maintain knowledge of area needs; learn potential ways to solve these needs.
Department of Workforce services	Maintain knowledge of area needs; learn potential ways to solve these needs.
New Horizons Crisis Center	Maintain knowledge of area needs; learn potential ways to solve these needs.
Division of Child and Family Services	Maintain knowledge of area needs; learn potential ways to solve these needs.
Snow College Small Business Development Center	Maintain knowledge of area needs; learn potential ways to solve these needs.
Utah State University Extension	Maintain knowledge of area needs; learn potential ways to solve these needs.
Family Support Center of Southwestern Utah	Maintain knowledge of area needs; learn potential ways to solve these needs.
Central Utah Public Health Department	Maintain knowledge of area needs; learn potential ways to solve these needs.
Ephraim City Housing Authority (Not HUD recognized)	Maintain knowledge of area needs; learn potential ways to solve these needs.
Mt Pleasant Redevelopment Agency	Maintain knowledge of area needs; learn potential ways to solve these needs.
SCAOG Housing Department	Understand Housing Programs, and collected data and goals on rehabilitation Programs
SCAOG Elected Officials	Improve relationships with constituents, collect data and goals for the capital improvement list.

This plan was created by the coordination and cooperation of every jurisdiction (cities, counties, and towns) in the region. The communities were presented with their capital improvement goals. The

elected officials guided SCAOG in updating this plan and the Capital Improvement List. They provided community project goals, including funding, and grant or loan sources (especially CDBG and CIB).

Table 2: Jurisdictions of the SCAOG Region

Juab	Millard	Piute	Sanpete	Sevier	Wayne
<ul style="list-style-type: none"> ● Eureka ● Levan ● Mona ● Nephi ● Rocky Ridge 	<ul style="list-style-type: none"> ● Delta ● Fillmore ● Hinckley ● Holden ● Kanosh ● Leamington ● Lynndyl ● Meadow ● Oak City ● Scipio 	<ul style="list-style-type: none"> ● Circleville ● Junction ● Kingston ● Marysvale 	<ul style="list-style-type: none"> ● Centerfield ● Ephraim ● Fairview ● Fayette ● Fountain Green ● Gunnison ● Manti ● Mayfield ● Moroni ● Mount Pleasant ● Spring City ● Sterling ● Wales 	<ul style="list-style-type: none"> ● Annabella ● Aurora ● Central Valley ● Elsinore ● Glenwood ● Joseph ● Koosharem ● Monroe ● Redmond ● Richfield ● Salina ● Sigurd 	<ul style="list-style-type: none"> ● Bicknell ● Hanksville ● Loa ● Lyman ● Torrey

Citizen Participation

Six County AOG takes three approaches to involve citizens in the creation of the Annual Action Plan:

- Provide online survey about community needs (See Appendix I)
- Discuss the Plan on the front page of the AOG website, www.sixcounty.com.
- Post public notice on the Utah Public Notice website to inform the public that the plan is open to comment for a 30-day comment period. Invite service providers to participate.
- Hold a public hearing for the plan after the comment period.

The draft plan was open for public comment from January 24, 2023 to February 24, 2023. A notice was published on the Utah Public Notice website. The text of the notice is as follows:

*REGIONAL ANNUAL ACTION PLAN ON HOUSING AND COMMUNITY DEVELOPMENT
30-DAY PUBLIC COMMENT PERIOD AND PUBLIC HEARING NOTICE*

Six County Association of Governments announces that a Public Hearing will be held on March 1, 2023 at 8:25 a.m. in suite B-46 at the Sevier County Administration Building at 250 north main street, Richfield UT. The purpose of the Public Hearing is to obtain citizen comment on the housing and community development needs of the Six County region for development of the Annual Action Plan for submission to the State of Utah, Department of Workforce Services, Housing and Community Development Division. The 2023 Annual Action Plan addresses decent housing, a suitable living environment, and expanded economic opportunities for low- and moderate-income residents. This plan is required by the U.S. Department of Housing & Urban Development and must be approved prior to Six County AOG receiving their allocation of the State Small Cities Community Development Block Grant (CDBG) program funding.

Information that will be provided at the public hearing includes a summary of the history of this program in the Six County region and the draft of the Annual Action Plan (The plan is attached to this notice also). If you have any questions about this hearing, or desire to submit comments regarding the Annual Action Plan, please contact Shay Morrison at 435-893-0737 or shaym@sixcounty.com or 250 N Main street Richfield, UT 84701.

In compliance with the Americans with Disabilities Act, individuals needing special accommodations (including auxiliary communicative aids and services) during this hearing should notify Shay Morrison at 435-893-0737 or shaym@sixcounty.com or 250 N Main street Richfield, UT 84701 at least three days prior to the hearing. Individuals with speech and/or hearing impairments may call the Relay Utah by dialing 711. Spanish Relay Utah: 1.888.346.3162

Following the end of the comment period, the following table summarizes the identified needs and comments from citizens and leadership in the area. Current as of 2/27/2023 at 12.36 p.m.

Citizens and Local leader responses	Identified Needs	Number of Responses
<ul style="list-style-type: none"> ● Economic Development - More Revenue ● Road Paving 	Low to Moderate income housing availability	12
	Water Infrastructure Improvements	35
	Sewer/Storm Infrastructure Improvements	22
	Public Health and Safety Projects	9
	Street/Sidewalk Improvements	34
	Recreation Facility Improvements	25
	Accessibility for Persons with a Disability	5
	Other Public Facilities	12
	Planning efforts (such as a comprehensive plan)	12
	Other needs	2

Expected Resources

Funding from state and federal sources is specific in purpose. As it relates to the goals and objectives of the Community Development Block Grant program, the following provide services that benefit the low and moderate income as it relates to affordable housing, community development and other services.

Approximately \$750,000 in funds is annually allocated to the Six County region for the Small Cities Community Development Block Grant program. Administration of the grant program is allocated \$50,000, community planning assistance is allocated \$50,000, and approximately \$100,000 is allocated towards housing rehabilitation through Six County AOG Housing and Community Action Department. This leaves approximately \$550,000 for other projects. There are no plans to leverage Community Development Block Grant funds with private, other state, or local funds at the Six County AOG level, but all applicants are encouraged to leverage Community Development Block Grant funds. There are no matching funds requirements for Community Development Block Grant funding recipients through Six County AOG. Applicants are encouraged, through an additional funding criteria, to leverage their projects with outside or local funds.

Goals & Objectives

Goal Outcome Indicator	Quantity	Unit of Measurement
Public Facility or Infrastructure Activity other than low/moderate income housing benefit	15	Persons Assisted
Public Facility or Infrastructure Activities for low/moderate income housing benefit		Households Assisted
Public service activities other than low/moderate income housing benefit		Persons Assisted
Public service activities for low/moderate income housing benefit		Households Assisted
Facade treatment/Business building rehabilitation		Business
Rental units constructed		Household Housing Unit
Rental units rehabilitated		Household Housing Unit
Homeowner housing added		Household Housing Unit
Homeowner housing rehabilitated	9	Household Housing Unit
Direct financial assistance to homebuyers		Households Assisted
Homelessness prevention		Persons Assisted
Businesses assisted		Businesses Assisted
Other		Other

Homeowner housing rehabilitation is offered through the Six County AOG Housing and Community Assistance Department. Funds through a Community Development Block Grant set-aside are leveraged with other programs that have similar objectives and are used for housing rehabilitation for those earning a low-moderate income. There is a spending maximum of \$10,000 on each home. Last year 9 households were assisted using this method and it is planned to assist, at minimum, approximately 10 households next year. Disabled individuals are a priority for the program.

One-year goals for the number of households supported through:	
Rental assistance	
The production of new units	
Rehab of existing units	10
Acquisition of existing units	
Total	10

After all set-aside funds have been allocated out, the remaining funds are made available to communities via a competitive application process to be used on eligible activities. Six County AOG can fund around two to five projects per year that will primarily benefit low to moderate income individuals.

Allocation priorities

Table 3: Community Development Block Grant funding break-down by jurisdiction

Funded in the last five years	Never Funded
<ul style="list-style-type: none"> ● Spring City ● Redmond ● Richfield ● Gunnison ● Mt. Pleasant ● Fountain Green ● Rocky Ridge ● Delta ● Gunnison ● Monroe ● Lyman ● Fillmore ● Sigurd ● Sevier County ● Bicknell ● Ephraim ● Torrey ● Salina 	<ul style="list-style-type: none"> ■ Aurora ■ Central Valley ■ Glenwood ■ Holden ■ Junction ■ Kingston ■ Leamington ■ Lynndyl ■ Mayfield ■ Meadow ■ Moroni ■ Oak City

Six County AOG has developed a ranking system that aims to prioritize the distribution of Community Development Block Grant funds. This ranking system is updated annually by the RRC, based off the recommendations of Six County AOG staff and the needs determined through this plan. Appendix II lists the region’s 2023 Community Development Block Grant Rating and Ranking Criteria.

As noted in the 2023 Annual Action Plan, infrastructure projects, especially those to do with water or street and sidewalk improvements, are top priorities for Community Development Block Grant allocations. Promoting projects with improvements following the Americans with Disabilities Act (ADA) is also considered a regional priority. Communities with higher rates of citizens who make a low-moderate Income (according to HUD income limits) also receive ranking status as Community Development Block Grant funding candidates, as do those projects with wider geographical impact. Applicants that have a higher amount of non-CDBG funding for a project are also more likely to receive Community Development Block Grant funding allocations.

Allocation priorities are meant to encourage new applicants to apply in order to assist all jurisdictions in the region as much as possible. Those that have not been funded in the past four years are ranked as a higher priority for Community Development Block Grant funds. Table 1 lists these communities. In addition, the region has decided that in order to continue to encourage new applications, a policy was adopted by the regional review committee. The policy states that applicants that were funded in the year immediately prior to this program year will not be eligible for funding under this allocation.

The jurisdictions likely have designated the projects they plan to apply for Community Development Block Grant funding in the next few years. This list is part of the Regional Capital Improvements List and is forthcoming.

The Six County AOG Community and Economic Development department receives a set-aside for administration of the Community Development Block Grant program in the Six County AOG region. These funds are prioritized because of administrative requirements necessary to obtain Community Development Block Grant funding. These include but are not limited to:

- 1) Developing and publishing the Six County Consolidated Plan and Annual Action Plan Updates
- 2) Providing technical assistance to counties, communities, and other project applicants in qualifying for Community Development Block Grant funding through application preparation, submission, and other support.

The Housing Rehabilitation Program will remain a priority, receiving a \$100,000 set-aside from the annual Community Development Block Grant allocation. If an individual or family earns a low income and their home has an issue that poses a health or safety threat, the program will provide a repair costing under \$10,000. Preference is given to individuals with a disability. This project is being prioritized because of its provision for providing safe and healthy living environments for the region's citizens who earn a low-income.

Another priority for funding that began in PY 2020 was to have a \$50,000 planning assistance set-aside from the Community Development Block Grant annual allocation. This money will be used to help communities that are predominantly low to moderate income to obtain professional planning and community development services. These planning services will be provided by Six County AOG staff upon request by eligible communities. This planning will mainly focus on preparing long term local comprehensive plans and capital asset improvement plans, in order to help maximize limited funding resources for the area.

As mentioned previously, the Six County Regional Review Committee reviews applicants and approves projects for funding. The applicant projects are judged by a set criteria and assigned points depending on how they measure. Table 4 demonstrates which criteria offer the highest points if met. Please see Appendix III for all the rating and ranking criteria and points available.

Table 4: Importance of Funding Criteria

Criteria	Importance
Capacity to carry out the grant	Up to 5 points
LMI Housing Stock	Up to 6 points
Affordable Housing Plan	Up to 2 points
Extent of Poverty	Up to 5 points
Leveraged Funds	Up to 5 points
Project Maturity/Application Completion	Up to 3 points
Overall Geographical Impact	Up to 5 points
Applicant has not had any projects in previous years	Up to 4 points
Project Priority	Up to 6 points
Proactive Planning	Up to 4 points
ADA Components	Up to 2 points
Population under 5,000	Up to 1 point

For a full list of policies and procedures that outline specific criteria and method of distribution for selecting applications please see Appendix IV.

Potential applicants may access the application manuals or other materials describing the application criteria by visiting the Six County Association of Governments offices located at 250 North Main, Richfield, Utah, Suite B-12. They may also visit the Utah Community Development Block Grant website at: <http://www.jobs.utah.gov/housing/cdbg/applications.html>. For general information about the Community Development Block Grant Program and application criteria applicants may contact Community Development Block Grant Manager, Shay Morrison.

A formal email outlining the Community Development Block Grant process is sent to each county commission and mayor 2-4 weeks before the How-to-Apply Workshop. Regional service provider agencies are also contacted. The notification explains Community Development Block Grant eligibility criteria and encourages participation in the How-to-Apply Workshops.

The process that an applicant must go through to be successful in receiving Community Development Block Grant funding is explained in detail at the mandatory How-to-Apply Workshop. This is a mandated training with two sessions offered at different times. If there are scheduling conflicts potential applicants may attend this workshop in another region. In addition, Six County AOG staff is available to discuss in detail the Community Development Block Grant program, criteria, and application requirements.

Applicants must select a qualified project (explained in the workshop), make sure the project benefits 51 percent low and moderate income (requiring a survey in some cases), complete the application, have a public hearing, and submit the application utilizing the state's online application Web-Grants. The project is then rated and ranked by the Regional Review Committee. Projects are prioritized for funding and awarded based on available resources. Both successful and unsuccessful applicants are notified as

to the results. Successful applicants then work with a State Community Development Block Grant representative through project logistics and funding.

At a minimum \$50,000 is allocated for administration of the Six County AOG Community Development Block Grant program. This amount must also not be more than 15 percent of the total allocation. This amount is subtracted from the total amount of funding given to the region. Six County HCAP also receives \$100,000 of the funding for housing rehab projects.

The remaining amount is allocated on a competitive basis. There is a state program minimum funding requirement of \$30,000 per project with the maximum amount being limited to \$500,000. Six County AOG adds additional restrictions by allowing for no more than 50 percent of the net allocation or \$250,000, whichever is less, to be awarded to any one applicant in order to encourage multiple projects and local match. This policy may be eliminated by a vote of the Regional Review Committee. More detail about the allocation process may be found in the Six County AOG Community Development Block Grant Policies and Procedures in Appendix IV.

Many of the communities do not have full time staff or have only volunteer staff. The expected outcome of these methods is to be simple and streamlined for individuals who are not experts with the federal grant system. Six County AOG offers as much administration assistance as needed by any community.

Public Housing

There are no Department of Housing and Urban Development recognized housing authorities in the Six County Region.

Barriers to Affordable Housing

In the 2023 Consolidated Plan there were several barriers to affordable housing. These include:

- Lack of smaller lot sizes to accommodate those who can only afford to pay so much for homes.
- Lack of private market interest in creating low-income housing.
- Lack of significant public resources including section 8 housing and funding opportunities for local governments.
- Lack of awareness and education for planning commissions, city councils, and town boards regarding regulatory barriers to affordable housing.

In the experience of Six County AOG staff, several of these barriers still exist, although significant strides have been made in recent years to overcome these barriers by using the following methods.

- Six County AOG does not set affordable housing criteria as a high priority in the region, but there is a \$100,000 set-aside specifically for home rehabilitation.
- Six County AOG is working with the elected officials and local planning commissions to educate them about 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.

- Six County AOG works with all communities to encourage and facilitate the adoption of a comprehensive low to moderate income housing plan.

Other

Home Management

SCAOG does not fund any Public Housing Agencies and does not take any actions to encourage public housing residents to become more involved in management and participate in homeownership.

There are several agencies in the region that provide this assistance without direct help from the SCAOG. They are also noted in the 2023 Consolidated Plan.

Coordination

SCAOG Community and Economic Development, Housing and Community Action Programs, and Aging Services Departments will continue to work with the regional Service Provider's Council by attending monthly meetings. The SCAOG HCAP department will work with public and private entities to coordinate critical needs of citizens within the Six County area. They will also coordinate and outreach to the public and provide affordable housing opportunities to qualified individuals. The SCAOG Community and Economic Development department will discuss housing needs with communities during their annual visit and assessment.

Appendix I Citizen/Elected Officials Participation Survey

Which county and city/town do you reside? _____

Please select the top THREE most important needs for your community based on your opinion.

- Low-moderate income housing availability
- Water infrastructure improvements
- Sewer/storm infrastructure improvements
- Public health/safety projects (EMS facility, ambulance, health clinic improvements)
- Other public facilities
- Street/sidewalk improvements
- Recreation facility improvements or additions (parks)
- Planning efforts (general plan etc.)
- Accessibility for persons with a disability in public areas
- Other: _____

Appendix II CDBG Rating and Ranking Criteria for SCAOG Region

Six County Association of Governments 2023 CDBG Rating and Ranking Criteria and Project Score Sheet		Total Project Cost:		Non-CDBG Funds:			
Applicant & Project:		CDBG Request:		Source of Funds:			
CDBG Rating and Ranking Criteria Description		Data Range/Score (Mark only one for each criteria)					Score:
1	Capacity To Carry Out The Grant: Rated by state staff. (See Note #1 for scoring)	5 points	4 points	3 points	2 points	1 points	
2	Percent Of Non-CDBG Funds Invested In Total Project Cost: Non-CDBG Funds Amount, Divided by Total Project Cost, Multiplied by 100.						
2a	Jurisdictions with a population less than 500	>10%	7.1-10%	4.1-7%	1.1-4%	<1%	
2b	Jurisdictions with a population of 501-1,000	5 points	4 points	3 points	2 points	1 point	
2c	Jurisdictions with a population of 1,001-5,000	>20%	15.1-20%	10.1-15%	5.1-10%	1-5%	
2d	Jurisdictions with a population greater than 5,000	5 points	4 points	3 points	2 points	1 point	
3	Non-CDBG Funds Secured: Non-CDBG funds have been Secured, Partially Secured, or Applied for.	>30%	25.1-30%	20.1-25%	15.1-20%	1-15%	
4	CDBG Funds Requested Per Capita: CDBG funds requested divided by the number of project beneficiaries.	5 points	4 points	3 points	2 points	1 point	
5	Jurisdictions with a population of less than 5,000 will receive 1 point.	5 points	4 points	3 points	2 points	1 point	
6	Project's Geographical Impact: Projects will be rated on their relative impact in the community both in terms of numbers and relative need.	1 point					
7	LMI Population: Percent of the projects beneficiaries considered 80 percent or less LMI. (based on HUD Pre-Approved LMI Communities or an LMI survey)	Secured	Partial	Applied			
8	Extent Of Poverty: The percentage of Low Income (LI: 50% AMI) and Very Low Income (VLI: 30% AMI) persons directly benefiting from the project.	3 points	2 points	1 point			
9	Project Maturity: (See Note #5 for scoring)	\$ 0.1-100.99	\$ 101-200.99	\$201-400.99	\$401-800.99	\$801 or >	
10	Applicant Funded In Previous Years:	5 points	4 points	3 points	2 points	1 point	
11	Project Priority: Determined by SCAOG Executive Board members. This Board is composed of a mayor and commissioner from each of the Six Counties.	1 point					
12	Remove Architectural Barriers (ADA): Does this project work to remove architectural barriers to persons with disabilities and/or is the project ADA compliant?	County	Portion of County	Community	Portion of Community		
13	Health And Safety: Does the project address serious health and safety threats.	5 points	4 points	3 points	2 points	1 point	
14	LMI Housing Stock: Infrastructure for the units, rehabilitation of units, new units and/or accessibility of units for LMI residents. (See Note #14 & #15 for scoring)	>90%	75.1-80%	60.1-75%	55.1-60%	51-55%	
15	Affordable Housing Plan Implementation: City/County has adopted an Affordable Housing Plan and this project addresses some element of that plan. (See Note #14 & #15 for scoring)	5 points	4 points	3 points	2 points	1 point	
16	Pro-active Planning: Communities who pro-actively plan for growth and needs in their communities. (See Note #16 for scoring)	>20%	15.1-20%	10.1-15%	5.1-10%	1-5%	
17	Civil Rights Compliance: Applicant is in compliance with federal laws and regulations related to civil rights. (See Note #17 for scoring)	5 points	4 points	3 points	2 points	1 point	
18	Application Completion: (See note #18) for Scoring	2 points	1 point				
19		2018 and Prior	2019	2020	2021		
20		4 points	3 points	2 points	1 point		
21		Water Infrastructure Improvements	Street/Sidewalk Improvements	Recreation Facility Improvements	Sewer/Storm Infrastructure	Public Facilities, Public	LMI Housing
22		6 points	5 points	4 points	3 points	2 points	1 point
23		Yes	No				
24		2 points	0 point				
25		Yes	No				
26		3 points	0 point				
27		>20 units	15 - 20 units	10 - 14 units	5 - 9 units	1 - 4 units	
28		6 points	5 points	4 points	3 points	2 points	
29		Yes	No				
30		2 points	0 point				
31		4 points	3 points	2 points	1 point		
32		2 points	1 point	0 point			
33		1 point	0 point				
Total Score:							0
Notes:							
#1 - This score will come from the CDBG state staff rating, which can be found under "Capacity to Carry Out the Grant" in the CDBG policies and procedures handbook.							
#9 - One point will be awarded if an architect/engineer is already selected and is actively involved in the application process, or an RFP process has been followed for equipment purchases. One point will be awarded if architectural/engineering designs/plans are completed for the project or a vendor has been selected for an equipment purchase.							
#14 & #15 - Both of these scoring criteria will only be utilized when scoring a housing project.							
#16 - One point will be awarded if the applicants general plan has been updated in the previous 5 years (ex. For the 2023 cycle: updated during or after 2018). One point will be awarded if the applicant maintains a detailed Capital Improvements List for future projects. One point will be awarded if the applicant keeps a detailed Asset Inventory list. One point will be awarded if the applicant can document an active planning and zoning commission. The Capital Improvements List, Asset Inventory list, and documentation of an active Planning and Zoning Commission must be submitted by the SCAOG December 15th, 2023 deadline.							
#17 - One point will be awarded if the applicant has completed the "ADA Checklist for Readily Achievable Barrier Removal" form. One point will be awarded if the applicant has adopted all of the following policies prior to the SCAOG December 15th, 2023 deadline: Grievance Procedure under the Americans with Disabilities Act, Section 504 and ADA Effective Communication Policy, Language Access Plan, and Section 504 and ADA Reasonable Accommodation Policy. (Forms available from SCAOG)							
#18 - One point will be awarded to applications that contain all correct required documentation under attachments in Webgrants 3 (i.e.: engineers estimate, scope of work, project location map, public hearing notice proof, public hearing minutes, SAM Registration and photographs of the project area.) at the time of application submission, by the December 15th, 2023 SCAOG deadline.							

Appendix III PY 2023 CDBG Application Scoring & Funded Projects

Name	Project	Amount
SCAOG Admin and Planning	CDBG Admin and Planning	\$50,000
SCAOG Regional Planning	CDBG Regional Planning	\$50,000
SCAOG Single Family Rehab	CDBG Single Family Rehab	\$100,000
1 Six County AOG	1 (Vehicle Acquisition)	\$89,999
2 Salina	2 (Park Project)	\$242,449
3 Richfield	3 (Park Project)	\$220,000
4 Gunnison	4 (Park Project)	\$250,000
5	5	\$92,685

Appendix IV CDBG Application Policies and Procedures

SIX COUNTY ASSOCIATION OF GOVERNMENTS

CDBG Application Policies

2024 Program Year

Method of Distribution

Community Development Block Grant (CDBG) – To ensure that CDBG projects administered through the Six County Region meet the national objectives. Six County Association of Governments (SCAOG) has implemented the following: 1.) An application will be rated and ranked against all submitted applications within the Region. 2.) Successful applications will be funded in order of priority as determined by the rating and ranking process until the regional CDBG funding allocation is exhausted.

CDBG POLICIES – 2024 Program Year

The following policies have been established to govern the CDBG award process. All eligible project applications submitted by the December 15th deadline will be accepted for rating and ranking.

1- SCAOG approved \$50,000 of the total annual CDBG allocation for administration of the SCAOG CDBG program. \$50,000 of the total annual CDBG allocation is also allocated for regional consolidated planning. Lastly, \$100,000 of the total annual CDBG allocation is allocated for Single Family Housing Rehabilitation. The remaining amount of annual SCAOG CDBG funds is allocated on a competitive basis. To encourage multiple projects and local match, no project will receive more than 50% of the net allocation or \$250,000, whichever is less. Depending on funding, the SCAOG Regional Review Committee (RRC) reserves the right to eliminate the 50% rule and \$250,000 maximum by a vote of the board.

2-In compliance with the policies of the State of Utah CDBG program, and to be eligible for funding consideration, all grantees or sub-grantees must have drawn down 50% of any prior year's CDBG funding prior to the RRC rating and ranking session.

3-Applicants must provide written documentation of the availability and status of all proposed non-CDBG funding at the time their application is submitted. A project is not mature and will not be funded if non-CDBG funding cannot be secured and committed by December 15th, 2023. If non-CDBG funds aren't secured and committed by December 15th, 2023, the applicant may provide a commitment letter by December 15th, 2023 that clearly states that they will pay the difference to fully complete their project if a different source of non-CDBG funding isn't secured and committed.

4-State policy has established the minimum amount of funding of \$30,000 per project and the maximum amount is limited only by the annual allocation amount, and the SCAOG CDBG policies outlined in paragraph 1 (one).

5-Projects must align with and be consistent with the Region's Consolidated Plan. Sponsored projects on behalf of an eligible sub-recipient may not necessarily be listed in the jurisdiction's capital investment plan, but the sub-recipient's project must meet goals identified in the Region's Consolidated Plan.

6-Attendance at one of the annual “How to Apply” workshops is mandatory for all applicants and sub-grantees. The project manager from the applicant’s jurisdiction should be in attendance. Newly elected officials and project managers are especially encouraged to attend, as the administrative requirements and commitments of a CDBG project are considerable.

7-Housing projects are encouraged to use the SCAOG Housing Department’s available resources and emergency projects may be considered by the RRC at any time. Projects applying for emergency funding must still meet a national objective and regional goals and policies. Projects may be considered as an emergency application if:

- Funding through the normal application timeframe will create an unreasonable risk to health or property.
- An appropriate third-party agency has documented a specific risk (or risks) that in their opinion need immediate remediation.
- Cost overruns from a previously funded project may be funded only if the RRC deems it an appropriate emergency.

8- The amount of any emergency funds distributed during the year will be subtracted from the top of the regional allocation during the next funding cycle. Additional information on the emergency fund program is available in the Application Policies and Procedures manual developed annually by the state in Chapter II, Funding Processes.

9- Applications on behalf of sub-recipients (i.e., special service districts, non-profit organizations, etc.) are allowed. The applicant city or county must understand that even if they name the sub-recipient as project manager, the city/county is still responsible for the project’s viability and program compliance. A subcontractor’s agreement between the applicant entity and the sub-recipient must accompany the application (after funds have been committed to the project).

10- Multi-year projects will be considered. Proposals must contain specific cost estimates and work elements by year so that annual allocations by the RRC can be determined at the outset. No projects over 2 years will be considered.

11- Project maturity will be considered in determining the awarding of funds for the funding cycle, i.e., project can be completed within eighteen months, leveraged funds are in place, detailed scope of work is developed, engineer’s cost estimates in place, etc.

12- Applicants that were funded in the year immediately prior to the current program year are not eligible for funding.

13- The application must be submitted by 5:00 PM Mountain Time (MT), December 15, 2023. Any applications received after this date and time will not be considered for funding.

14- Applicants with lower populations may receive additional points in the “Percent of Non-CDBG Funds Invested In Total Project Cost” category.

15- In the event of a tie the following policies will be followed:

- A-The project is in a Distressed Community
- B-The project that has the highest percentage of LMI beneficiaries
- C-The project with the most non-CDBG funds leveraged
- D-The Project with the most points in the Geographical Impact category

16-All projects will be fully funded in the order of their rating and ranking prioritization. Once a balance remains insufficient to fully fund the next project in the order of rating and ranking prioritization, that project will be given an opportunity to receive funds, with two conditions: 1.) The project must be able to maintain the same scope of work that was listed in their initial application. 2.) The project must be able to be rated and ranked the same as their initial application. This process will continue until no additional projects can be funded. The remaining balance will then be added to the region's single-family housing rehab program allocation for that funding cycle.

17-The SCAOG RRC is filled by the members of the SCAOG Executive Board. This 12-member committee is composed of a commissioner and a mayor from each county of the region. Members of the committee are appointed by their county and fulfill terms until the end of their elected period or reappointment if they still hold office. Due to election cycles, the approximate term of a board member is 4 years. The chair of the RRC is the chair of the SCAOG Executive Board.

The Six County Regional Review Committee has approved the following set-asides for funding:

- **Housing** - \$100,000 if the allocation is over \$400,000. If the allocation is under \$400,000 then 25% of the allocation for the SCAOG Housing department to help LMI individuals access available housing resources.
- **Regional Planning** - \$50,000 for planning activities to be conducted by SCAOG staff in HUD pre-approved or survey approved Low to Moderate Income communities.
- **Administration & Consolidated Planning** - \$50,000 for administration of the CDBG program, updating an annual action plan, and meeting with communities to identify planning needs.

Appendix V Online Post for Citizen Outreach

Public participation welcome for Regional Annual Action Plan

Every year the Six County Association of Governments produces an Annual Action Plan as required by the U.S. Department of Housing and Urban Development (HUD). The Plan details the community development, housing needs and priorities of Juab, Millard, Piute, Sanpete, Sevier, and Wayne Counties. There is special emphasis on serving the needs of the low and moderate income and special needs populations.

The purpose of the plan is to identify implementation of HUD funded projects and activities that should take place in the immediate or near future. The planning process is undertaken with the assistance of towns, cities, counties, and the public to identify, prioritize and quantify the cost of capital improvement needs in each jurisdiction. In January communities are interviewed individually about their needs.

Six County also works with the regional public housing agencies and other service providers to identify gaps in affordable housing and for appropriate means to address those gaps. Public hearings are in conjunction with the regional governing body, or executive board, to solicit public involvement in the plan development process.

The following questions are considered in the development of the Annual Action Plan:

1. What are the key priorities for housing and community development for each jurisdiction in the region, and the region as a whole?
2. What opportunities exist for integration and coordination of federal, state and/or local programs?
3. How can SCAOG and the Utah Small Cities Community Development Block Grant (CDBG) program, which is administered through the Utah Division of Housing and Community Development (HCD) help foster better coordination?
4. What data or other information would help us in developing and improving the housing and community development decision making process as it relates to rating and ranking of projects proposed for HUD funding?

Public participation in the planning process is encouraged for the upcoming 2023-2024 plan. The final plan will be published in the Summer of 2023.

You may provide input to the SCAOG Regional Planner, Brock Jackson, at (435) 893-0733, via e-mail: brock@sixcounty.com, or mail: 250 North Main St, P.O. Box 820, Richfield, UT 84701

Appendix VI - Public Comment



Public Comment Submission

To: Shay Morrison, CDBG program manager
250 N. Main St. P.O. Box 820, Richfield, UT. 84701
Phone: 435.893.0737 Email: shaym@sixcounty.com

Date: February 27, 2023

From: Olga M. Cano, EPA WaterSense | Cano.olga@epa.gov

Ref: Public Comments for REGIONAL ANNUAL ACTION PLAN ON HOUSING AND COMMUNITY DEVELOPMENT 30-DAY PUBLIC COMMENT PERIOD AND PUBLIC HEARING NOTICE

Please receive the following comments as a reply to the CBDG Annual Action Plan July 1, 2023 – June 30, 2024 posted [HERE](#) and open for public comment.

SOURCE	ORIGINAL TEXT / COMMENT
CDBG Action Plan Draft (pg 3)	Improve infrastructure of jurisdictions with citizens that primarily make a low-moderate income.
WaterSense Comments	Requiring that WaterSense-labeled plumbing products are installed and that newly built homes are WaterSense certified as part of the rehabilitation work is an opportunity to both improve the local infrastructure by mitigating the impact of new construction and development on local and limited water resources, as well as benefiting low-moderate income residents by lowering their utility bills as a result of lower water usage.
CDBG Action Plan Draft (pg 6)	Water Infrastructure Improvements were identified as the “top voted” need by communities ranking as #1, as noted in the table on page 6.
WaterSense Comments	WaterSense plumbing products and WaterSense certified homes are both effective strategies to improve, protect and extend the lifespan of water infrastructure systems. Requiring that WaterSense-labeled plumbing products are installed and that newly built homes are WaterSense certified as part of the rehabilitation work is an opportunity to support water infrastructure improvement projects by lowering the demand of potable water for household end uses and outdoor irrigation as well as lowering the amounts of wastewater entering the system.
CDBG Action Plan Draft (pg 9)	As noted in the 2022 Annual Action Plan, infrastructure projects, especially those to do with water or street and sidewalk

	<p>improvements, are top priorities for Community Development Block Grant allocations.</p> <p>Communities with higher rates of citizens who make a low-moderate Income (according to HUD income limits) also receive ranking status as Community Development Block Grant funding candidates, as do those projects with wider geographical impact</p>
WaterSense Comment	<p>We applaud the prioritization of water. Given that water is a priority with CDBG allocations, water efficiency should be a top tier strategy as a way to conserve and protect this natural resource. The EPA WaterSense program, a non-regulatory and voluntary program, certifies plumbing products to be 20% more efficient than standard products and homes to be 30% more efficiency than typical new construction. The program provides an opportunity to mitigate the impact of redevelopments and new housing as well as the added benefit of lower household utility bills by lowering the household water use – both indoor and outdoors.</p>
CBDG Action Plan Draft (pg. 19)	<p>13-The application must be submitted by 5:00 PM Mountain Time (MT), December 15, 2022. Any applications received after this date and time will not be considered for funding.</p>
WaterSense Comment	<p>Typo. Text correction below:</p> <p>13-The application must be submitted by 5:00 PM Mountain Time (MT), December 15, 2023. Any applications received after this date and time will not be considered for funding.</p>