



SALT LAKE CITY HOME-ARP ALLOCATION PLAN

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Salt Lake City HOME-ARP Allocation Plan Template with Guidance

Instructions: All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: Requirements of the Use of Funds in the HOME-American Rescue Plan Program, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- *CoC(s) serving the jurisdiction's geographic area,*
- *homeless service providers,*
- *domestic violence service providers,*
- *veterans' groups,*
- *public housing agencies (PHAs),*
- *public agencies that address the needs of the qualifying populations, and*
- *public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.*

State PJs are not required to consult with every PHA or CoC within the state's boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Participating Jurisdiction: Salt Lake City

Date: 3/16/2022

Describe the consultation process including methods used and dates of consultation:

This HOME-ARP allocation plan was prepared in consultation with agencies and service providers whose clientele include the HOME-ARP qualifying populations (QPs). QPs include:

- Individuals or households that are currently homeless or are at-risk of experiencing homelessness, or
- People who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, human trafficking, or
- Populations for whom supportive services would prevent the family's homelessness or having a high risk of housing instability, or
- Households with a veteran family member that meets one of the above criteria.

A wide variety of agencies serve the needs of QPs, including, but not limited to, entities that focus on homeless services, veterans' groups, individuals with disabilities, persons facing violence and abuse, and those offering mental health services. On the front lines daily, these entities have provided invaluable insights and data for inclusion in this allocation plan and provide the foundation of our allocation plan analysis.

In order to receive as much input as possible from the QPs, a survey was provided to 79 entities (listed below) to identify unmet needs and gaps in facilities and services, as well as to solicit feedback from these agencies on identifying HOME-ARP eligible activities currently taking place in their jurisdiction.

A cover letter explaining the purpose of the survey and the importance of each entity's feedback, signed by representatives from Salt Lake City and Salt Lake County, was also sent with the

survey. The survey was conducted from January 24, 2022, through February 25, 2022, with follow-up phone calls and e-mails sent to non-responsive entities after that time period. In some cases, follow-up interviews took place in order to gather more data and a deeper understanding of current needs – especially unmet needs. The survey response rate was approximately 42%. All CoCs, PHAs, Domestic Violence Service Providers, and Veteran Services responded to the survey. A brief summary of responding organizations and the comments received are shown in the table below.

In addition to the survey responses, extensive research and data was gathered regarding homelessness, populations at risk of homelessness, veterans, and persons attempting to flee situations of violence (domestic, dating, sexual assault, human trafficking, etc.). Major data sources used include: Comprehensive Housing Affordability Strategy (CHAS), local point-in-time counts (PIT), CoC data, South Valley Services (Sanctuary), YWCA, Utah Community Action and United States Census data.

List the organizations consulted:

Agency/Org consulted	Type of Agency/Org	Method of Consultation	Feedback
Advantage Services, Inc.	Homeless Services, Veterans’ Group, Organization Serving Persons with disabilities	Survey	Highest unmet need is Homeless – Individual or Family. Preferred use of funds is for the Creation of Affordable Rental Housing. Organization Comments: Greatest gap in housing is lack of affordable housing.
Alliance House	Homeless Services, Organization Serving Persons with Disabilities	Survey	Highest unmet need is At Risk of Homelessness. Preferred use of funds is for the Creation of Affordable Rental Housing. Organization Comments: Greatest gaps in housing are truly affordable housing.
TheSoap2Hope	Homeless Services, Human Trafficking	Survey	Highest unmet need is Fleeing, or Attempting to Flee (Domestic Violence, Dating violence, Sexual Assault, Stalking, or Human Trafficking).

			<p>Preferred use of funds is for Nonprofit Operating and Capacity Building Assistance.</p> <p>Organization Comments: Greatest gaps in housing/shelter are safety, openings, crisis undisclosed shelter for victims, trauma informed services. Shelters are understaffed and overwhelmed.</p> <p>We need HOME-ARP funding in areas where the population can access resources without barriers.</p>
Department of Workforce Services	Government Entity, Services for Low Income Families/Individuals, Families/Individuals at Risk of Homelessness	Survey	<p>Highest unmet need is At Risk of Homelessness.</p> <p>Preferred use of funds is for Acquisition Development of Non-Congregate Shelter Units.</p> <p>Organization Comments: Need available affordable housing.</p>
Assist Inc.	Fair Housing Organization, Organization Serving Persons with Disabilities	Survey	<p>Highest unmet need is At Risk of Homelessness.</p> <p>Preferred use of funds is for the Creation of Affordable Rental Housing.</p> <p>Organization Comments: Greatest gap in services is permanent supportive services and case management for persons experiencing homelessness.</p>
Family Support Center	Homeless Services, Domestic Violence Survivors, Human Trafficking Survivors, Families/Individuals at Risk of Homelessness	Survey	<p>Highest unmet need is Homeless – Individual and Family.</p> <p>Preferred use of funds is for Nonprofit Operating and Capacity Building Assistance.</p> <p>Organization Comments:</p>

			Greatest gap in housing/shelter is for family sober living. Greatest gap in services is mental health care providers.
Journey of Hope, Inc.	Homeless Services, Domestic Violence Services, Human Trafficking Services, Organization Serving Persons with Disabilities.	Survey	Highest unmet need is At Risk of Homelessness. Preferred use of funds is for the Creation of Affordable Rental Housing. Organization Comments: Greatest gap in housing/shelter is not enough DV/SA trafficking beds on the Wasatch Front.
Family Promise Salt Lake	Homeless Services	Survey	Highest unmet need is Homeless – Individual or Family. Preferred use of funding is for Nonprofit Operating and Capacity Building Assistance.
Housing Authority of Salt Lake City	Homeless Services, Domestic Violence Services, Veterans' Group, Fair Housing Organization, Organization Serving Persons with Disabilities, Families/Individuals at Risk of Homelessness	Survey	Highest unmet need is At Risk of Homelessness. Preferred use of funds is for Nonprofit Operating and Capacity Building Assistance. Organization Comments: The greatest gap to housing/shelter is affordable accessible housing with limited qualifying restrictions.
State of Utah, Office of Homeless Services	Government Entity, Homeless Services	Survey	Highest unmet need is Homeless- Individual or Family. Preferred use of funds is for Acquisition / Development of Non-Congregate Shelter Units.

YWCA Utah	Homeless Services, Domestic Violence Services, Human Trafficking Services	Survey	<p>Highest unmet need is Fleeing, or Attempting to Flee (Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking).</p> <p>Preferred use of funds is for Nonprofit Operating and Capacity Building Assistance.</p>
Utah Community Action	Homeless Services, Families/Individuals at Risk of Homelessness	Survey	<p>Highest unmet need is Fleeing, or Attempting to Flee (Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking).</p> <p>Preferred use of funds is for the Creation of Affordable Rental Housing.</p>
The Road Home	Homeless Services	Survey	<p>Highest unmet need is Homeless-Individual or Family.</p> <p>Preferred use of funds is for the Creation of Affordable Rental Housing.</p> <p>Organization Comments: Greatest gap in housing/shelter is the extreme lack of deeply affordable housing stock. This deficit leads to reduced shelter outflow and means we are able to serve fewer people with emergency shelter and housing.</p>
Fourth Street Clinic	Homeless Services, Healthcare Provider	Survey	<p>Highest unmet need is Homeless - Individual or Family.</p> <p>Preferred use of funds is for the Acquisition / Development of Non-Congregate Shelter Units.</p>

<p>Asian Association of Utah</p>	<p>Refugee & Immigrant Service Provider</p>	<p>Survey</p>	<p>Highest unmet need is At Risk of Homelessness.</p> <p>Preferred use of funds is for the Creation of Affordable Rental Housing.</p>
<p>First Step House</p>	<p>Homeless Services, Veterans' Group, Substance Use Disorder and Mental Health Treatment, Organization Serving Persons with Disabilities</p>	<p>Survey</p>	<p>Highest unmet need is Homeless - Individual or Family.</p> <p>Preferred use of funds is for the Creation of Affordable Rental Housing.</p> <p>Organization Comments: Many of the homeless and chronically homeless concurrently struggle with co-occurring and chronic mental health conditions that will not ever resolve. Our systems must realign to support these individuals over long periods of time, in some cases indefinitely.</p>
<p>Veterans Affairs SLC</p>	<p>Veteran Services</p>	<p>Survey</p>	<p>Highest unmet need is Homeless - Individual or Family.</p> <p>Preferred use of funds is for the Creation of Affordable Rental Housing.</p> <p>Organization Comments: Greatest gaps in needed housing/shelter are in the aging population - over age 55. We are seeing an alarming rate of seniors being displaced from their homes. They do not have the ability to increase their income based on their age. We need more affordable senior housing.</p>

Disability Law Center	Civil Rights Organization, Fair Housing Organization, Organization Serving Persons with Disabilities	Survey	Highest unmet need is At Risk of Homelessness. Preferred use of funds is for Supportive Services.
Rape Recovery Center	Domestic Violence Services, Human Trafficking Services	Survey	Highest unmet need is Homeless - Individual or Family. Preferred use of funds is for Nonprofit Operating and Capacity Building Assistance. Organization Comments: Non-profit organizations need capacity building dollars.
Crossroads Urban Center	Homeless Services, Families/Individuals at Risk of Homelessness	Survey	Highest unmet need is At Risk of Homelessness. Preferred use of funds is for the Creation of Affordable Rental Housing. Organization Comments: Focus on deeply targeted affordable housing and Permanent Supportive Housing.
Helping Hand Association - DBA The Haven	Homeless Services, Organization Serving Persons with Disabilities	Survey	Highest unmet need is Homeless - Individual or Family. Preferred use of funds is for Supportive Services.
The INN Between	Homeless Services, Healthcare Provider	Survey	Highest unmet need is Homeless - Individual or Family. Preferred use of funds is for the Creation of Affordable Rental Housing. Organization Comments: Greatest gap in housing/shelter is access to appropriate services to obtain the very limited housing available. Lack of seasonal shelters.

Utah Domestic Violence Coalition	Domestic Violence Services, Human Trafficking Services	Survey	<p>Highest unmet need is At Risk of Homelessness.</p> <p>Preferred use of funds is for Acquisition / Development of Non-Congregate Shelter Units.</p> <p>Organization Comments: Greatest gap in needed services is flexible funding to help remove barriers for survivors of violence to gain access to housing or maintain their current housing.</p>
NeighborWorks of Salt Lake	Low-Income Home Buyer Assistance	Survey	<p>Highest unmet need is Fleeing, or Attempting to Flee (Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking).</p> <p>Preferred use of funds is to create Affordable Rental Housing.</p> <p>Organization Comments: Greatest gap in needed services is for mental health, substance abuse, affordable healthcare access in general.</p>
Salt Lake Valley Habitat for Humanity	Low-Income Home Buyer Assistance, Families/Individuals at Risk of Homelessness	Survey	<p>Highest unmet need is Families seeking stable housing.</p> <p>Preferred use of funds is to create Affordable Rental Housing.</p>
Clean Slate Utah	Low Income Legal Services	Survey	<p>Highest unmet need is At Risk of Homelessness.</p> <p>Preferred use of funds is to create Affordable Rental Housing.</p>

<p>211/United Way of SLC</p>	<p>Homeless Services, Domestic Violence Services, Human Trafficking Services, Civil Rights Organization, Organization Serving Persons with Disabilities, Families/Individuals at Risk of Homelessness</p>	<p>Survey</p>	<p>Highest unmet need is Homeless - Individual or Family.</p> <p>Preferred use of funds is for Tenant-Based Rental Assistance (TBRA).</p> <p>Organization Comments: The greatest gap in housing/shelter is tenant choice housing vouchers that reflect current cost of local average rent and not based on prior year domestic rent values. Also, the aging population is rapidly facing homelessness due to fixed income/retirement no longer keeping pace with senior housing voucher values.</p>
<p>Salt Lake City Mission</p>	<p>Homeless Services, Food Pantry</p>	<p>Survey</p>	<p>Highest unmet need is Homeless - Individual or Family.</p> <p>Preferred use of funds is for Supportive Services.</p>

<p>Department of Health and Human Services</p>	<p>Government Entity</p>	<p>Survey</p>	<p>Highest unmet need is At Risk of Homelessness.</p> <p>Preferred use of funds is for Tenant-Based Rental Assistance (TBRA).</p> <p>Organization Comments: The greatest gaps in needed housing/shelter are too many restrictive conditions and definitions. Hard to find information on certain programs and website information being incorrect with no response to inquiry's online about programs by staff. We do not have enough special housing programs with services for people with disabilities.</p>
<p>Shelter the Homeless</p>	<p>Homeless Services</p>	<p>Survey</p>	<p>Highest unmet need is Homeless - Individual or Family.</p> <p>Preferred use of funds is for the Creation of Affordable Rental Housing.</p> <p>Organization Comments: Greatest gap in housing/shelter is deeply affordable housing, non-congregate shelter. Greatest gap in services is in case management and medical support.</p>
<p>West Valley City Housing Authority</p>	<p>Housing Authority, Domestic and Other Violence Services, Fair Housing Organization, Organization Serving Persons with Disabilities, Families/Individuals at Risk of Homelessness</p>	<p>Survey</p>	<p>Highest unmet need is Homeless - Individual or Family.</p> <p>Preferred use of funds is for Tenant-Based Rental Assistance (TBRA).</p> <p>Organization Comments: Greatest gap in housing/shelter is the lack of affordable, safe, and decent rental units.</p>

Public Housing Authority DBA Housing Connect	Housing Authority, Domestic and Other Violence Services, Veterans' Group, Fair Housing Organization, Organization Serving Persons with Disabilities, Families/Individuals at Risk of Homelessness	Survey	<p>Highest unmet need is Homeless - Unaccompanied Youth under 25 Years of Age.</p> <p>Preferred use of funds is for the Creation of Affordable Rental Housing.</p> <p>Organization Comments: Greatest gap in housing/shelter is deeply affordable housing. Greatest gap in services is supportive services that focus on housing retention.</p>
Salt Lake City and Salt Lake County CoC - Salt Lake Valley Coalition to End Homelessness	Homeless Services, Government Entity, Families/Individuals at Risk of Homelessness	Survey	<p>Highest unmet need is Homeless - Individual or Family.</p> <p>Preferred use of funds is for the Creation of Affordable Rental Housing.</p> <p>Organization Comments: Greatest gap is housing - 2,950 housing units now and 1,400 additional units annually. Shelter - 450+ overflow shelter beds. Greatest gap in services is in case management and behavioral health.</p>

Summarize feedback received and results of upfront consultation with these entities:

The feedback received is backed up by the data researched and forms the basis for our allocation of HOME-ARP funds. Specifically, our allocation plan prioritizes the gaps described by survey respondents and identified in the data. The major unmet eligible needs described by respondents include creation of deeply affordable rental housing and supportive services for the qualifying populations of individuals or families experiencing homelessness, at risk of homelessness, and domestic violence victims.

Public Participation

*In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow*

*its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.*

PJs are required to make the following information available to the public:

- *The amount of HOME-ARP the PJ will receive, and*
- *The range of activities the PJ may undertake.*

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Date(s) of public notice: 5/22/2022***
- ***Public comment period: start date - 5/22/2022 end date - 6/8/2022***
- ***Date(s) of public hearing: 6/1/2022***

- ***Date(s) of public notice: 2/7/2023***
- ***Public comment period: start date - 2/7/2023 end date - 3/21/2023***
- ***Date(s) of public hearing: 2/21/2023***

Describe the public participation process:

Salt Lake City will conduct two public comment periods and public hearings, one during the creation of the plan from May 22, 2022, to June 8, 2022, and another *to be completed after Council review*. The public hearing on June 1, 2022, had no attendees. There were no public comments during the first comment period. The draft allocation plan was available on the Salt Lake City Housing Stability website for any person to view and comment on. The public notice can be found [here](#) and is an attachment to this plan. *More information will be included after the second public hearing.*

Describe efforts to broaden public participation:

The notice of the public comment period and public hearing is posted in the local newspaper, online at Salt Lake City Housing Stability’s webpage, and through City Council postings. The posting was available in English and Spanish as well as ADA compliant.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

There were no public comments received during the public comment period from May 22, 2022, to June 8, 2022, and no attendees of the public hearing on June 1, 2022. *More information will be included after the second public comment period.*

Summarize any comments or recommendations not accepted and state the reasons why:
 There were no comments nor recommendations not accepted by Salt Lake City.

Needs Assessment and Gaps Analysis

*In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.*

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units*	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	483	47	862	Not Avail.	0								
Transitional Housing	226	60	136	Not Avail.	80								
Permanent Supportive Housing	1,155	333	1,394	Not Avail.	622								
Other Permanent Housing						0	0	0	0				
Sheltered Homeless						634	1,055	73	329				
Unsheltered Homeless						0	268	7	26				
Current Gap										1,230	Not Avail.	1,069	Not Avail.

Data Source: CoC Housing Inventory Count (HIC) and Point in Time Count (PIT) (2020)

Although there is an aggregate surplus of family and adult shelter beds, according to the above table, there is a difference with each population. For example, there are 1,323 adults experiencing homelessness in Salt Lake City and 862 beds available for immediate need. Transitional and permanent housing may take time to achieve, and a person will have to utilize a shelter bed while waiting on an application to transition or permanent housing. The gap for shelter beds available to families are 151. The gap for adult only shelter beds are 461. It is likely that all permanent supportive housing currently in Salt Lake City is rented at capacity.

Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	42,179		
Rental units Affordable to HH at 30% AMI (At-Risk of Homelessness)	4,745		
Rental units Affordable to HH at 50% AMI (At-Risk of Homelessness)	14,850		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		6,555	
30%-50% AMI Renter HH w/1 or more severe housing problems (other populations)		2,380	
<i>Current Gaps</i>			8,935

Data Source: Comprehensive Housing Affordability Strategy (CHAS) (2014-2018)

The above table shows a surplus of housing units available and affordable to households at 50% AMI. When looking at households at or below 30% AMI there is a significant gap of 1,810 units. This shows the need for deeply affordable rental units for residents at or below 30% AMI. It is likely that the number of households will continue to grow as Salt Lake City population grows over the next five to ten years. Providing more deeply affordable housing will keep up with the continued population growth that Salt Lake City is seeing.

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Within the boundaries of Salt Lake City, we have the following data regarding the HOME-ARP qualifying populations:

1,958 people met the HUD definition of Homeless, residing in local shelters, transitional housing, or unsheltered during the HUD 2020 Point in Time Count. As shown in the table above, there are 7 unsheltered homeless veterans and 73 sheltered homeless veterans. There are 26 unsheltered victims of domestic violence and 329 sheltered victims of domestic violence. Other data received, including 2021 Fall Point in Time Counts indicate an increase in homelessness during the Covid-19 pandemic. The data shows that during Covid-19 unsheltered counts increased significantly. In 2021, the unsheltered PIT count represented approximately 17% of the homeless population. Further, approximately 18% of the homeless population avoided access to shelters due to Covid-19. In addition, the number of unsheltered individuals from 2019-2020 increased by 39% while the overall homeless population only increased by 6.3%.

	2018	2019	2020	2021 Fall
Unsheltered	136	193	268	306
Sheltered	1668	1651	1690	1502
Total	1804	1844	1958	1808

Source: Salt Lake City/Salt Lake County PIT

Of concern is the fact that unsheltered unaccompanied youth increased by 121% between 2019 and 2020, although show some decrease in 2021.

Population	2018	2019	2020	2021 Fall
Persons in Households with Adult(s) and Child(ren)	-	-	-	4
Persons in Households with Only Children	1	-	-	-
Persons in Households with Only Adults	135	193	268	302
Chronically Homeless Individuals	44	86	120	91
Veterans	7	12	7	15
Unaccompanied Youth	9	19	42	8
Persons with HIV	5	1	6	5

Source: Salt Lake City/Salt Lake County PIT

According to the 2020 Point in Time Count, the largest demographic of those experiencing homelessness are those people who identify as White at 71%; the second largest demographic are people who identify as Black at 13%. In addition, people identifying as American Indian or Alaska Native represent 5%; Pacific Islanders represent 3%; Asians represent 1%; and multiple races represent 7%.

Homeless as defined in 24 CFR 91.5

The total number of emergency shelter beds in Salt Lake City are 1,349 (HIC, 2020). As shown in the table above, the number of homeless individuals is 1,958 (PIT, 2020). This indicates a shortage in emergency shelter beds versus homeless individuals. In addition, 4,166 people became homeless for the first time in 2020.

At Risk of Homelessness as defined in 24 CFR 91.5

According to 2014-2018 CHAS data, approximately 76% of the City's cost-burdened households are renters and 60% are severely cost-burdened. According to CHAS data, Salt Lake City has 12,550 households that have an annual income under 30% AMI. This increases the risk of homelessness for those that are trying to maintain their current housing as house prices and rental rates continue to surge at an alarming pace. Median rent in Salt Lake City has increased by nearly 75% from 2000-2019 (2015-2019 ACS 5-Year Estimates). Close to 84% of survey respondents indicated development of rental housing is extremely important to qualifying populations. In addition, 97% stated permanent housing should be expanded to meet the needs of qualifying populations.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

There are two primary domestic violence service providers, South Valley Services (SVS) and YWCA Utah. These organizations serve individuals fleeing, attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking, as defined by the HUD Notice CPD-21-10. Together, within a one-year period, the two agencies have provided housing, safety and other services to 1,597 individuals that include men, women, and children in the State of Utah. SVS has received 2,217 hotline calls, 923 Lethality Assessment Program (LAP) calls, case-managed 1,007 individuals, and provided therapy to 426 individuals. YCWA served 2,112 individuals by domestic violence programs in the last year. The YWCA had 309 requests for services that could not be met and 48% of those were for housing. There are more data gaps in our Domestic Violence and Human Trafficking data due to more strict confidentiality rules surrounding this qualifying population.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

Other populations include individuals or households experiencing evictions, those earning under 50 percent of AMI, and those living in neighborhoods with low mobility rates. CHAS data indicates there are 22,610 households in Salt Lake City that are below 50% AMI. In the consultation survey, respondents identified lower-income renters and the elderly as especially vulnerable to housing instability due to rising rents and home prices. In conjunction with job losses and unemployment due to the pandemic, as well as a reliance by the elderly on fixed incomes, there is an increasing gap between incomes and housing costs.

Service providers indicated an increased need in services, including hotline calls, requests for shelter, eviction prevention, mental health services, medical care, case management and housing supports. Nearly 89% of survey respondents stated homelessness prevention services should be expanded in the regional area to support qualifying populations.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

According to the 2020 HIC report, the current resources to meet the needs of qualifying populations are as follows: 4,915 total year-round beds which include, 1,712 of emergency, safe haven and transitional housing beds, and 3,203 of permanent housing beds which include permanent supportive housing, rapid re-housing, and other permanent housing.

The HIC report specifically identifies 2,199 family beds, 2,711 adult only beds and 5 child only beds. Subsets of the total year-round inventory include 757 beds for veterans, 110 beds for youth and 1,501 beds to serve the chronically homeless. In addition, there are 58 seasonal beds, and 160 overflow/vouchers. Data is not available to distinguish between congregate and non-congregate shelter units. Salt Lake City used motel vouchers to create non-congregate shelter units, currently there are no non-congregant shelters in Salt Lake City.

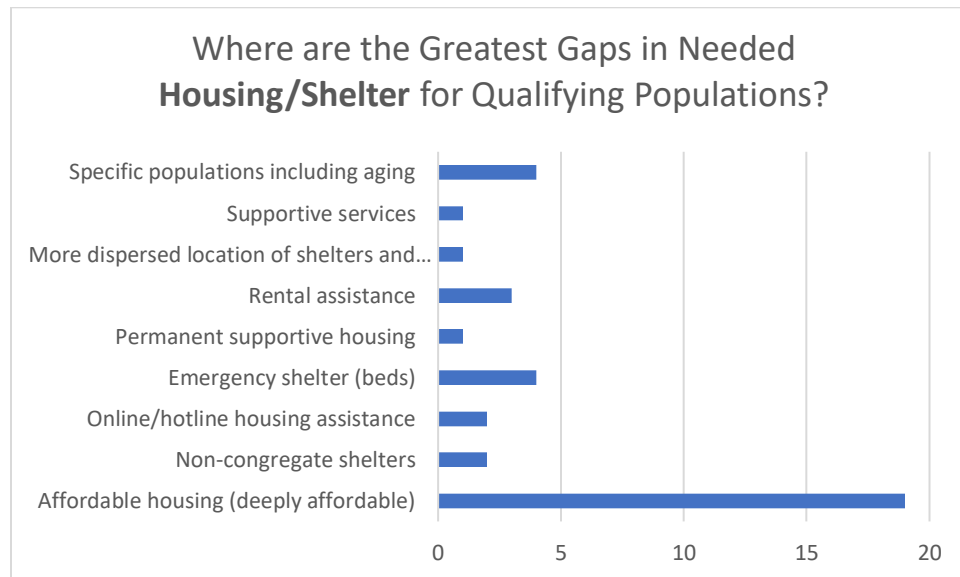
Salt Lake City has made efforts to offer a wide range of services including TBRA, medical/dental services, mental health counseling, domestic violence shelters and counseling, legal aid and resources to identify available affordable housing.

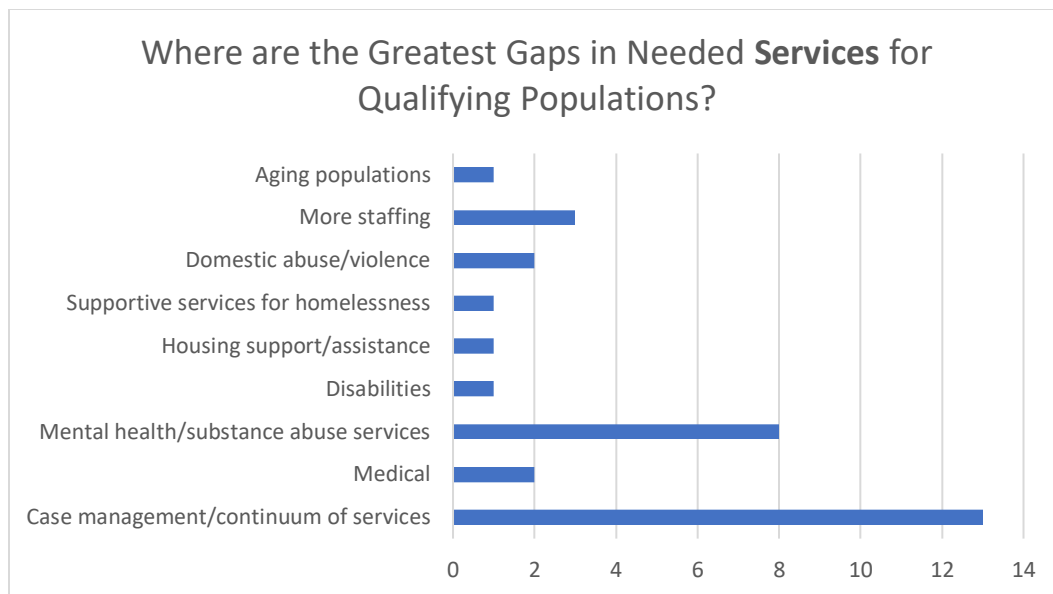
In November 2020 the Kem C. Gardner Policy Institute provided a report outlining the current challenges in serving qualifying populations given the existing governance structure and made several recommendations for improvements, including the appointment of a statewide homeless services officer, a homeless council, and a philanthropic consortium. In addition, as reflected in the consultation process, the need for affordable housing is a high priority to service providers and government entities.

Describe the unmet housing and service needs of qualifying populations:

As discussed in the sections above, the number of unsheltered homeless individuals has increased by 39% from 2019-2020. According to survey respondents, nearly 54% indicated a gap in affordable housing inventory in the regional area. This is also shown in the 2014-2018 CHAS data. As stated, multiple times throughout the consultation process, the need for services has increased and access to these services has become cumbersome for qualifying populations. In addition to limiting barriers to access these services, service providers are in need of qualified staff to assist with providing services and support. As shown in the graph below, survey respondents stated there is a gap in case management services for qualifying populations.

While the need for more affordable housing and more case management services was listed as a need for all groups, as shown in the survey responses below, specific needs for the various qualifying populations are listed following the two graphs.





Homeless as defined in 24 CFR 91.5

Over 60 percent of survey respondents indicated that their primary services were directed to this group of qualifying populations. Major unmet needs for this group include:

- Availability of deeply affordable housing for individuals or families
- Tenant Based Rental Assistance
- Homeless Service Support
- Additional Shelter Beds

At Risk of Homelessness as defined in 24 CFR 91.5

Around 30 percent of survey respondents indicated that their primary services were directed to populations at risk of homelessness. Major unmet needs for this group include:

- Supportive services and case management services
- Affordable Housing Options
- Tenant Based Rental Assistance
- Aging populations accessing affordable housing

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Over 48 percent of survey respondents indicated that their primary services were directed this group of qualifying populations. Major unmet needs for this group include:

- Crisis shelters for victims
- Staffing and Services
- Non-congregate shelter options

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

Approximately 61 percent of survey respondents indicated that their primary services were directed at other populations requiring services or housing assistance for those at greatest risk of housing instability. Major unmet needs for this group include:

- Affordable Housing
- Provide Supportive Services

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

Based on the data provided by the CoC Housing Inventory Count (HIC) and Point in Time Count (2020), there is currently sufficient inventory to match the homeless population, as seen in the above *Homeless* table. However, this count is a summation of all homeless inventory available to all populations included in the homeless count and does not account for gaps within the total inventory such as needs for specific homeless services and beds. The count also does not include the potential needs for families and individuals at greater risk of homelessness, such as those staying in hotels, doubled up with family, or cars. Those populations may not be counted in some of these numbers and many families under 50% AMI are housing cost burdened, paying over 30% of their income towards rent. Being housing cost burdened increases your likelihood of eviction as one financial emergency can remove the ability to pay rent.

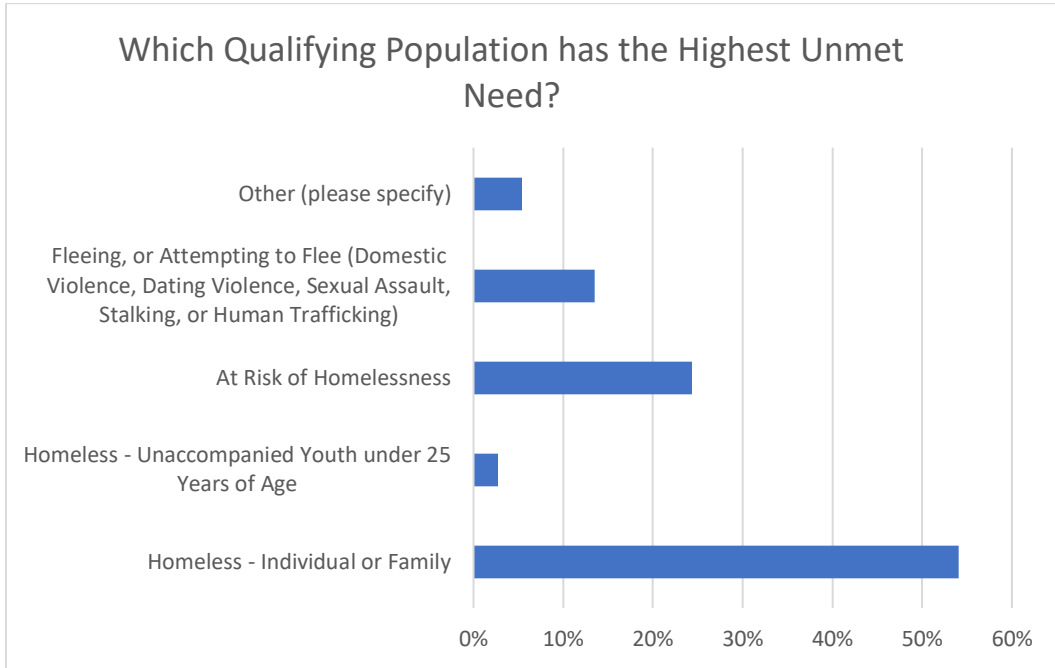
The housing inventory gap analysis also shows a surplus in aggregated housing inventory available to households under 50% AMI. However, when only considering households with 0-30% AMI and the inventory available to these households which are at risk of homelessness, there appears to be a gap of 1,810 units available. This indicates that there is a substantial need in additional affordable housing at the lower level of AMI to better meet the needs of those at risk of homelessness.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

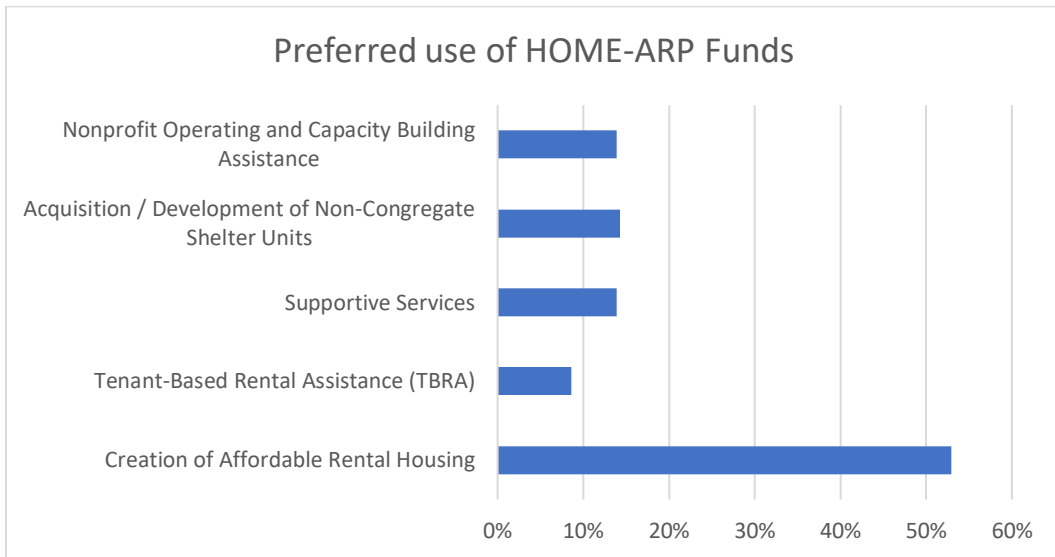
According to CHAS, there are 1,010 households with at least two persons where either one or both are 62 years old or older and have a total household income of less than 50 percent of HAMFI. The Salt Lake School District had a mobility rate of 17.1% among its families in the 2019-2020 school year according to data provided by the Utah State Board of Education. This percentage may have been affected by COVID-19 as the previous 6 school years each had a mobility rate of at least 23.7%.

Identify priority needs for qualifying populations:

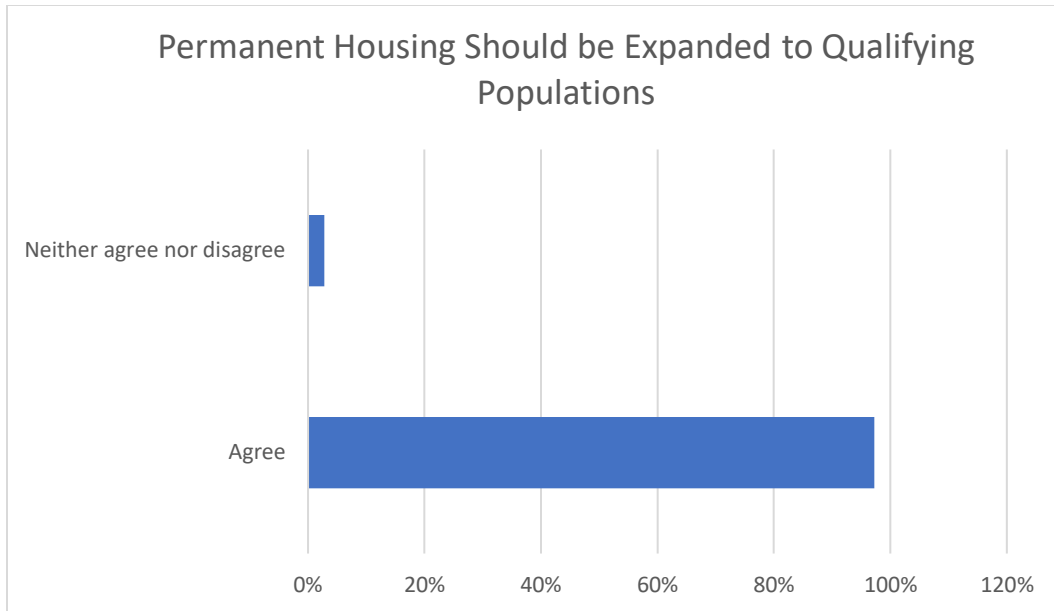
As indicated by the survey results and shown in the graph below, the qualifying population with the highest unmet need is homeless individual or family at 54.04%.



Next, when asked to rank the preferred use of HOME-ARP funds for qualifying populations, the creation of affordable rental housing ranked the highest with 52.94%.



In addition, when asked whether permanent housing should be expanded to qualifying populations, 97.22% strongly agreed/agreed with the statement.



Lastly, when survey respondents commented on any other areas related to the eligible use of HOME-ARP that should be considered as a funding priority, 53.57% indicated housing; of those who indicated housing, the following specific types of housing were mentioned:

- Deeply targeted affordable housing – 20%
- Senior housing – 13%
- Long-term housing – 13%
- Supportive housing – 6%
- Non-congregate housing – 6%
- Sustainable housing – 6%

To summarize, the data and survey results conclude the qualifying population with the greatest unmet need is homeless individual or family and the priority need suggests affordable housing should be expanded within the regional area.

Explain how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery systems based on the data presented in the plan:

The methodology used in the creation of this HOME-ARP Allocation Plan were derived from various sources, including 2020 and 2021 (Fall) PIT, 2020 HIC, 2014-2018 CHAS, U.S. Census Bureau 2015-2019 ACS 5-Year Estimates and through the consultation process with service providers and government entities.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

Salt Lake City will solicit applications through a competitive application process. This process will be similar to that of the annual HUD funding Salt Lake City receives. Agencies and developers will be able to apply for funding through an application open for a minimum of thirty days. Eligible projects will then go through the public process which includes going before a public City review board, the Mayor, and City Council for final recommendations and approval. During the process Salt Lake City will outreach and collaborate with non-profit agencies, Other Salt Lake City Divisions, the Redevelopment Agency of Salt Lake, and other local municipalities to maximize the impact of HOME-ARP funding.

Describe whether the PJ will administer eligible activities directly:

Salt Lake City will work with a subrecipient or developer to administer the selected activities. Salt Lake City will provide oversight, but will not administer eligible activities directly.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

This question is not applicable. Salt Lake City Housing Stability has not provided any administrative funds to a subrecipient or contractor. We will provide program oversight and administration of the HOME-ARP funding. While subrecipients will be selected to undertake approved activities, Salt Lake City will not be contracting out the administration of our HOME-ARP grant or program oversight.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services (Rental Assistance, Case Management, Victim Services, etc.)	\$ \$0		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 1,501,608.00		
Development of Affordable Rental Housing	\$ 1,501,608.00		
Non-Profit Operating	\$ 0	# %	5%
Non-Profit Capacity Building	\$ 0	# %	5%
Administration and Planning	\$ 529,979.00	15%	15%
Total HOME ARP Allocation	\$ 3,533,195		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The survey and data gathered for Salt Lake City identified deeply affordable housing and case management supportive services as a major need and gap.

City Council previously approved \$176,659.75 as administration funds for Housing Stability to use for the required consultation process and the creation of the allocation plan. Salt Lake City can use up to \$529,979.00 for administration and planning costs which can go to Housing Stability staff that have been working on the allocation plan and will continue to administer the HOME-ARP funding until 2030.

To address the need for deeply affordable housing, Salt Lake City will fund the development of affordable rental housing in the amount of \$1,501,608.00. Salt Lake City will prioritize the use of these funds for developments that incorporate mixed-income and family housing. This funding can be used in conjunction with a current project, as long as federal requirements are adhered to, for acquisition, rehabilitation, or new construction of affordable rental housing. All HOME units must be set aside for qualifying populations as defined in the HOME-ARP Notice CPD-21-10 to include: individuals or families experiencing homelessness, individuals or families at risk of homelessness, individuals or families fleeing or attempting to flee domestic violence, victims of human trafficking, individuals or households at risk of housing instability or requiring services to prevent homelessness, and veterans or families with a veteran. All qualifying populations must be considered to comply with HOME-ARP requirements.

In addition to development, and to further increase housing options, Salt Lake City will fund rental assistance under Tenant Based Rental Assistance (TBRA) in the amount of \$1,501,608.00. TBRA can be used to fund payments to cover insufficient amounts that the qualifying household cannot pay for housing and housing related costs, such as rental assistance, security deposits, and utilities deposits for qualifying populations.

This funding can be used with one or multiple subrecipient nonprofits in the community. Many organizations are already providing these resources but are reaching capacity and the need is much higher than the availability. This would allow for nonprofits to divert other funding resources to hire or retain staff that are assisting Salt Lake City residents, who meet the definition of a qualifying population, while also providing needed rental assistance.

Salt Lake City will serve qualifying populations by prioritizing development of affordable housing and TBRA over the other eligible activities based on the community assessment, local legislative priority, and other known resources available within the community.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

According to the data gathered and the survey respondents there is a high need in additional affordable housing. There seems to be a gap of 8,935 rental units for individuals and families making at or below 50% AMI. That gap continues to grow in the current economy of increased inflation and increased rental rates that wages are not able to keep up with. Currently Salt Lake City has two of the five homeless resource centers in its incorporated boundary and one domestic violence shelter. To promote housing first and take the survey into consideration, creating deeply affordable housing would address both the housing inventory gap and the current amount of people utilizing the homeless resource centers.

The nonprofits that provide rental assistance resources to the qualifying populations state that their staffing capacity is low, due to recruitment challenges and low retention. Funding TBRA would allow for nonprofits to divert other funding resources received to hire or retain staff that are assisting Salt Lake City residents, who meet the definition of a qualifying population, while also providing needed rental assistance.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

If Salt Lake City provides \$1,501,608.00 in funding for affordable housing developments, it would assist with one to two development projects depending on the need and size of the project. HUD waived the maximum per-unit subsidy for HOME-ARP development dollars. It would be anticipated that a project will be mixed with fair market, high affordability, and low affordability units to sustain the project for at least 15 years. This mix can also include units of varying size, from studio to four bedrooms to accommodate individuals and families. According to the HUD Housing Production Goal Calculation spreadsheet, Salt Lake City estimates producing or supporting 4-8 units for HOME-ARP qualifying populations. Salt Lake City estimates spending between \$200,000 and \$400,000 of HOME-APR dollars on each deeply affordable HOME unit. That number is based on a recent deeply affordable project as well as accounting for the increasing material and labor costs in the construction market.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

Affordable rental housing production is part of Salt Lake City's 2020-2024 Consolidated Plan under the goal of housing. This goal is to expand housing options, specifically affordable housing citywide. The 2020- 2024 Consolidated Plan identified 5,075 households assisted over the four-year timeframe, which is 1,268 annually (Consolidated Plan SP-45, 2020-2021 Action Plan AP-20). The number identified includes annual CDBG, ESG, HOME, and HOPWA funding for projects like rehabilitation, development, home ownership, and rental assistance. Since this funding would be including development and TBRA it can support the goal of assisting 1,268 household. Based on the 2020-2021 CAPER, it is likely that HOME-ARP will assist in 11 of the rental housing production goal for the 2020-2024 Consolidated Plan.

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A preference permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A method of prioritization is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).*
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and*

civil rights laws and requirements when establishing preferences or methods of prioritization.

*While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.***

For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

The survey respondents have clearly stated that more deeply affordable housing is needed in Salt Lake City for families and individuals experiencing homelessness. Homeless individuals and families defined in the HOME-ARP Notice, according to ESG and CoC. It is proposed that deeply affordable housing being created would prioritize families and individuals experiencing homelessness.

TBRA would not have a prioritization based on qualifying populations and can be open to any agencies that provide an eligible service to any qualifying population.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

According to the housing inventory numbers previously shown there is a gap in deeply affordable units, for individuals and families making less than 30% AMI. There are currently 4,745 units available to Salt Lake City residents at or under 30% AMI with 6,555 households in Salt Lake City falling under the 30% AMI threshold. That leaves a gap of 1,810 units needed for the current residents. That does not consider the increase in population that Utah and Salt Lake City will likely see over the next five years.

Creating deeply affordable housing units and prioritizing families and individuals currently experiencing homelessness will address the gap in housing since most individuals and families experiencing homelessness fall under 30% AMI and are currently priced out of the rising rental market.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

- 1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;*
- 2. the CE does not include all HOME-ARP qualifying populations; or,*
- 3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE*

*If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).*

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

Local subrecipients will be required to operate HOME-ARP funded programs with no exclusions in the following way. All TBRA activities will be utilized on a first come, first eligible basis. The Development projects must be required to use a first come, first served basis, unless the family or individual is currently experiencing homelessness. That family or individual currently experiencing homelessness can be prioritized for the HOME units in the project being created. All subrecipients and projects will be required to have a waitlist for the HOME-ARP program. Based on the qualifying population, required documentation will be needed to support the qualifying status. Documentation may include but is not limited to; Utah Homeless Management Information System (UHMIS), Paystubs/ Tax Returns, Case Manager Verification, State Assistance Verification (SNAP, TANF, Unemployment), VA Verification.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

Salt Lake City does not intend to use the coordinated entry process established by the CoC since it does not serve all the qualifying populations listed in the HOME-ARP Notice CPD-21-10.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

Not Applicable

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

Not Applicable

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- *PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.*
- *A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.*
- *Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.*
- *For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.*
- *PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.*

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

Salt Lake City does not intend to limit eligibility for HOME-ARP rental housing.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not Applicable

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Not Applicable

EXHIBIT: Summary of Public Comment

SUMMARY OF PUBLIC COMMENTS

The first Public Comment Period was a hybrid meeting held May 22, 2022, through June 8, 2022, with a Public Hearing hosted by Housing Stability on June 1, 2022. There were no comments received during the Public Comment period or the Public Hearing. This Public Comment Period was an opportunity for the public to review and give feedback on an initial draft of the HOME-ARP Community Assessment and Allocation Plan.

A second Public Comment Period will be held February 7, 2023, through March 21, 2023, with a second Public Hearing on February 21, 2023. After this period, received public comments will be reviewed and included in the final submission to HUD of the HOME-ARP Allocation Plan and Substantial Amendment to the 2021-2022 Annual Action Plan.

All Public Comment Notices are posted in English and Spanish on the State's Public Notice website, printed in a newspaper of general circulation, sent to community partners to post, and provided to the Mayor's Office and the Council Office for dissemination on social media platforms and other applicable forms of electronic communication and noticing.