

U. S. Department of Housing and Urban Development



Community Planning and Development

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ANNUAL COMMUNITY ASSESSMENT SUMMARY

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| JURISDICTION | City of Logan, Utah |
| PROGRAM YEAR | 2010 |
| PERIOD COVERED BY ASSESSMENT | July 01 2010– June 30 2011 |
| CDBG GRANT AMOUNT | \$640557 |
| FIVE YEAR CON PLAN PERIOD: | 2009-2013 |

HUD is required to conduct an annual review of performance of grant recipients according to the provisions of the Housing and Community Development Act and the National Affordable Housing Act. We must determine that each recipient is in compliance with the statutes and has the continuing capacity to implement and administer the programs for which assistance is received. This synopsis reports the results of HUD's review of the city of Logan's (City) performance during Program Year (PY) 2010, as reported in its Consolidated Annual Performance & Evaluation Report, (CAPER).

Part I. Summary of Annual Action Plan Review and Assessment

The City's PY2010 CAPER has been evaluated to determine the City's accomplishments planned through its PY2010 Annual Action Plan (AAP) and Five Year Consolidated Plan, covering program years 2009-2013, and approved by HUD.

Based on assessment of its AAP intent and outcomes reported in its CAPER, the City is meeting the main purpose of the Community Development Block Grant (CDBG) Program; to development viable communities by providing decent housing and a suitable living environment, principally for Low and or Moderate Income (LMI) Persons. The City continues to be consistent with this intention and is commended for using nearly 100% of PY2010 CDBG funds to benefit LMI persons, thus surpassing the 70% LMI benefit required by the CDBG Program.

The City's AAP reported funding 17 community development activities: 1-economic development, 1- homeownership assistance, 6- public facilities, 7-public services and 2-housing rehabilitation activities. The City's CAPER reported that 68% or 11 of the 17 activities were completed during this program year. The City reported that its partner, Neighborhood Nonprofit Housing Corporation (NNHC), achieved 86% of its proposed objective of offering down payment assistance to 14 LMI homebuyers, and benefited 12 Moderate Income households. The City reported another partner achieved 67% of its proposed objective to offer emergency home

repairs to 6 LMI households and benefited 4 households. The City's CAPER reported that its Housing Rehabilitation Assistance Program achieved its objective of assisting two LMI households with rehabilitation of both homes to achieve safety and energy building codes standards. However, HUD's reporting system indicates that 10 homes are proposed to benefit from this activity and there is no demographic or income information about the two final beneficiaries to confirm the activity met a national objective.

As discussed during a teleconference call with Mr. James Olson, CDBG Coordinator for the City, maintaining current records on each of the City's activities demonstrates good program oversight. It also validates that a national objective is being met on each activity, through the provision of demographic data and information, such as income, racial and even social information. HUD understands that the City is receiving monthly and quarterly activity reports from its subrecipients. The data and information collected in these reports should be transferred into activity record-keeping in a timely manner. Please refer to the detailed discussion in an email sent on the 29th November, 2011, Subject: *Presumed Benefit for Public Facilities, PY2010 City's CAPER*.

The City's CAPER reported that it has completed 4 of 7 Public Service activities ranging from employment training for persons with disabilities, afterschool programs, English skills training and legal assistance for resident-immigrant populations. The City reported that 4 of 6 Public Facilities activities were completed during the program year. These activities entailed building space expansion and infrastructure upgrades to enable community service expansion and or maintain the safety of the buildings. Two streetscape projects, 1- ADA curb design improvement to enhance connectivity and access, 2- Rehabilitation of the public right of way along a neighborhood street to facilitate use of sidewalks have yet to be completed. The City funded an economic development activity that is expected to result in jobs creation in the downtown area. The City reported no business participation in the business loan program. The City reported that it will reevaluate this program and evolve its existing program to gain interest.

PY2010 represented the second year of the City's Five Year Strategic Plan, PY2009-2013. It initially established seven objectives that it wished to pursue during this five year time frame. The City's strategy for improving the quality of LMI neighborhoods and the lives of LMI residents will ensure that annual activities address the community objectives established in its Five-Year Consolidated Plan. However, these seven objectives do not include measureable goals to gauge progress toward attaining the seven objectives described in the City's Five Year Plan. The City's CAPER reported under its Assessment of Goals and Objectives, its annual proposed and actual outcomes of completed activities. However, there are no reported measureable relationships to accomplishing objectives set out in its City's Five Year Plan. The City is reminded that CDBG program requirements ask for measureable performance reporting of annual program year objectives, and how these objectives are progressively measured to strategically attain consolidated (five year) planning goals.

Part II. Summary of Grantee Performance

Citizen Participation

The City made improvements to its Citizens Participation Program during this program year. The City reported that it reformatted its CAPER to better appeal to its residents, using more tables, charts and especially photos. The City shared ten significant CDBG activities before City Council, as part of its CAPER public hearing. The CAPER discussion before City Council was televised on the City's local television channel. The City also made a presentation before the City's Planning Commission to inform them about the City's CDBG program, during PY2010.

The City participated in two significant events to public outreach & participation. The City hosted a four-session CDBG 101 Workshop; open to residents and local organizations, to share information about its CDBG Program and solicit participants' community development ideas.

The City participated in an outreach event, providing resources at an information booth in conjunction with a Non-Profit Day at the local shopping mall. The City is highly commended for its efforts to better enlighten and engage its residents with its CDBG Program.

Fair Housing and Equal Opportunity

The City reported that it addressed housing discrimination through various strategies. It hosted an all day training in April 2010 titled 'Live Free Without Discrimination' Fundamentals of Fair Housing. Representatives from 11 public and private organizations were in attendance. The City marketed this training event to 37 local real estate and property management offices and 91 area non-profits, landlords and tenants. Communication about the event was made available to persons with hearing impairments. However, the City did not report on its efforts to market to persons who are challenged with understanding English. The City continues to offer Good Landlord Classes to landlords and has reached 650 business persons, since July 2010. The City reported adopting a new land development code on February 1, 2011, dictating zoning and design requirements within the City of Logan. According to the CAPER, the Grantee reviewed the new land development code and "no negative ramifications to fair housing were identified."

Also in PY2010 the City Council approved an ordinance to prohibit housing discrimination based on sexual orientation. The City reported that it is in the process of updating the 2006 Analysis of Pediments to furthering fair housing in 2011. The City is highly commended for its efforts to promote housing civil rights.

CDBG Program

The City reported leveraging its CDBG funds with other local and state funds, generated through general funds, special taxes, and private foundation dollars generated through donations and fund raisers and in-kind services, in order to carry out CDBG activities. The City is commended for accomplishing community goals by leveraging resources.

With regards to financial management aspects of HUD federal funds, the City is commended for spending its allocations on projects and programs in a timely manner. HUD's Integrated Disbursement & Information System (IDIS) reported that the City had a use-ratio of 0.55 grant years of funds remaining in the line of credit, 60 days prior to the beginning-date of the 2011 program year. This is under the limit of 1.5 grant-years of funds remaining unspent as a new program year begins. Planning and Administrative costs were inaccurately reported and corrected to 14% of grant allocation, which is under the 20% maximum. Public Service obligations represented 13% of funds, which were under the 15% of grant threshold. These financial management indicators demonstrate the City's capacity to capably use such federal resources.

Continuum of Care (CoC)- Addressing Homelessness

The City reported that it contributed \$238,500 of its CDBG allocation to 8 service programs that directly and indirectly prevented homelessness. The City reported that the City's most recent Point In Time Homeless Survey, orchestrated by the Bear River Association of Governments (BRAG), indicated 13 persons were homeless in the City's boundaries. BRAG is the three-county area's lead CoC. The City is a partner in the Cache (Valley) Interagency Council, consisting of a network of non-profit organizations, educational, religious and government organizations that network on community needs, including addressing homelessness. The City reported that it provided a presentation on its CDBG Program to this council of some 85 members, to collaborate on leveraging funds. The City is commended for its efforts to partner with area organizations and coordinate joint efforts to address and prevent homelessness.

Integrated Disbursement and Information System (IDIS)

The City has completed and closed out projects prior to PY2008. The City is commended for providing good explanations of progress in PY2009 and 2010 activities in comment fields. HUD wishes to offer the observations on the following activities.

PY2008 Activity No 68 remains open until beneficiary information can be obtained from the subrecipient, pending construction of low income housing for veterans. The City is maintaining ample information about the progress of this activity, in the comment fields.

PY2008 Activity No 85 remains open, but appears to have completed its intent to create 15 part time and full time jobs. The City is asked to review this activity and close it.

PY2009 Activity No 106 remains open and is incorrectly recorded as benefiting limited clientele (LMC). This activity is more appropriately coded as LMA, since in it appears to be benefiting a neighborhood area. The City is reminded to report the designated census tract and block groups. See LMA discussion under the next activity.

PY2009 Activity No 108 (CDBG-R) remains open, and is noted as meeting a national objective of benefiting a LMI Area through presumed benefit. The City is reminded that presumed benefit

is applicable for projects that are specifically targeted at a presumed LMI category of persons, such as homeless persons or senior citizens. For this CDBG-R project, the City is required to establish that it is in fact benefiting an LMA area, validated through census tracts and blocks data. The City is asked to validate that this project will benefit an area with at least 51% LMI residents, using the appropriate census information.

Part III. HUD Evaluation and Conclusions

A. OVERALL EVALUATION

The City has demonstrated that its programs and projects are benefiting low- and moderate-income residents, particularly in collaboration among dedicated non-profit and government service providers. This CAPER demonstrates the City's substantial performance is addressing community development needs. Additionally, HUD encourages the City to continue to input data into IDIS in order to meet annual performance measurement requirements and performance measurement output-indicators; as well as assess performance by measuring short term outcomes to long-term objectives.

B. CONCLUSIONS AND FINDINGS

The Office of Community Planning and Development (CPD) has reviewed the city of Logan's CAPER with its information and data reflecting annual performance; and the prescribed Community Planning and Development Programs specified in the Community Development Block Grant-Annual Plan dated July 1, 2010 through June 30, 2011. Based on this review and the information summarized above, CPD makes the following findings:

1. During the period specified July 1, 2010 through June 30, 2011, Logan has sufficiently carried out its programs as described in its Annual Plan as approved; and according to the overall objectives of the 2009-2013 Consolidated Plan.
2. The Annual Plan, as implemented, complies acceptably with the requirements of applicable laws and regulations.
3. Logan has the continuing capacity to carry out its approved program in a timely manner.


PART IV. Approval

SUMMARY PREPARED BY

 30 November 2011

Shayne Brady Representative Date

REVIEW AND CONCURRENCE

 12/5/2011

Karen Clark Program Manager Date

APPROVAL

 12/13/11

Leroy Brown Director Date