



DRAFT FOR PUBLIC DISPLAY

2021 Annual Action Plan

City of Pueblo and Pueblo Consortium

June 9 - July 9, 2021

Executive Summary

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

1. Introduction

The City of Pueblo is a federal entitlement community under the U.S. Department of Housing and Urban Development's Community Development Block Grant (CDBG) Program. The City of Pueblo and Pueblo County participate as a Consortium within the HOME Investment Partnerships Program (HOME).

As a CDBG Program HUD entitlement community, the City is required to prepare an Annual Plan to implement any federal programs that fund housing, community development, and economic development within the community. This Annual Plan covers FY 2021 (March 1, 2021 through February 28, 2022) and will be submitted to HUD for approval.

The purpose of the Annual Plan is to guide federal funding decisions in FY2021. The Annual Plan is guided by three overarching goals that are applied according to a community's needs. The goals are:

1. To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing.
2. To provide a suitable living environment through safer, more livable neighborhoods, greater integration of low- and moderate- income residents throughout the City, increased housing opportunities, and reinvestment in deteriorating communities.
3. To expand economic opportunities through more jobs paying self-sufficient wages, homeownership opportunities, development activities that promote long-term community viability, and the empowerment of low- and moderate- income persons to achieve self-sufficiency.

The overall priority for the investment of federal funds is to increase self-sufficiency and economic opportunity for lower income residents and individuals with special needs so that they can achieve a reasonable standard of living.

In addition to \$438,476.42 in HOME program income, the City of Pueblo anticipates receiving the following federal resources in FY 2021:

- CDBG \$1,504,131
- HOME \$852,826

2. Summarize the objectives and outcomes identified in the Plan

The goals and objectives identified in the 2021 Annual Action Plan tie back to the Strategic Plan, which is part of the 2020-2024 Consolidated Plan. The Strategic Plan provides a framework to address the needs of the City using CDBG and HOME funds. The three overarching objectives guiding the proposed activities are:

- Providing Decent Affordable Housing
- Creating Suitable Living Environments
- Creating Economic Opportunities

Outcomes show how programs and activities benefit a community or the people served. The three outcomes that will illustrate the benefits of each activity funded by the CDBG and HOME programs are:

- Improve Availability/Accessibility to housing and services
- Improve Affordability of housing and services
- Improve Sustainability of housing and services

All activities funded in FY2021 will support at least one objective and one outcome. The identified priorities include:

1. Affordable Housing
2. Public Services including Services for Homelessness
3. Public Infrastructure and Facilities
4. Economic Development and Community Revitalization
5. Fair Housing Education and Outreach
6. Administration and Planning

3. Evaluation of past performance

The following evaluation of past performance is from the FY2019 (March 1, 2019 through February 28, 2020) Consolidated Annual Performance and Evaluation Report (CAPER). This CAPER has been submitted to HUD but has not yet been approved. The accomplishments that follow are those achieved through the expenditure of CDBG and HOME funds:

In 2019, the City received \$1,433,344 in CDBG grant funds and allocated \$33,102.89 in program income from prior years. The City drew down CDBG funds in the amount of \$1,643,074.41, based on PR26- Report. The 2019 HOME grant received was \$749,275, and the City drew down \$312,393.76. The City will return to HUD \$20,213.22 in recaptured funds from previous projects funded by the HOME grant. Matching funds to the HOME grant in the amount of \$94,412 were provided by the Consortium members. Based on the PR-26 Report,

\$1,137,084.21 (93.7%) of the funds drawn benefited low and moderate-income households and neighborhoods.

The City and the Consortium exceeded its program year goals in several categories (Public Services, Public facilities and Infrastructure, and tenant-Based Rental Assistance) but finished short of its goals in affordable housing, homeless prevention, and demolition. New rental housing projects were delayed seeking capital, but at the time of this report 51 of the 67 units are under contract. The remaining sixteen units, a motel conversion, are still in negotiations. There is a possibility that the motel project may find new life as a non-congregate care facility responding to the COVID19 virus. Additional staff development is underway with efforts to improve production numbers in the Emergency Repairs and Essential Services Program. A retooling in this program accounts for lower rehabilitation production. While the number of demolition projects are down, the costs of demolition is ever increasing. Additional expenses in this category account reduced volume. Homeless service numbers are less than predicted due to facility relocation. The homeless supportive service facility was relocated to increase accessibility in service delivery. The program start was delayed by six months. The number served is at 47% of expected, and the City anticipates that the number served will be met in the balance of the grant.

There were a total of 2,226 persons assisted with CDBG and 72 households assisted via HOME. Among those assisted with CDBG funds, 79% identify as white, 46% as Hispanic and 43% as a female head of household.

In 2019, the CDBG grant leveraged \$15 million, in additional funding for public service programs. Private Activity Bond in the amount of \$5.6M was allocated to the Colorado Housing Finance Authority for the development of multi-family properties. In 2017, The City donated land for the Uplands Townhome Project which was finished in this program year and accounts for the 72 new units created. The value of the land was appraised at property transfer in the amount of \$415,000. The City has offered \$46,225 in reduced permits, taps, and fees to a developer for the construction of a new 35-unit permanent supportive housing development to begin in late 2020.

The City and County currently fund non-profit agencies through the CSAC Partnership. A total of \$978,928 in general revenue funds were provided by the City and County. For the 2019 reporting period, the Commission recommended funding for 34 agencies. Health and human service agencies received \$598,333 (61%); childcare received \$138,223 (14%); youth program received \$160,540 (16%), and cultural activities & events received \$65,290 (7%). The County allocated the 5% administration fee it normally receives directly to the grantees. This funding leveraged \$54 million in other federal, state and private funding.

4. Summary of Citizen Participation Process and consultation process

The City of Pueblo's Department of Housing and Citizen Services developed an outreach effort to maximize input from a large cross-section of stakeholders. This outreach effort included an online survey, virtual public meetings, published meeting notices, and virtual stakeholder meetings. The outreach process highlighted several key issues within the community including the need for quality, affordable housing, accessible housing, housing and services for those experiencing homelessness, workforce training and economic development activities. A complete summary of Citizen Participation, including comments, is included in the Citizen Participation Appendix.

5. Summary of public comments

The following is a summary of comments received during the public outreach period prior to the Plan being on public display. This section will be updated once the outreach process is complete.]

Challenges to Affordable Housing

Tuesday, March 16, 2021, at 2 PM

Challenges Faced by Low- and Moderate-Income Renters

- There is an existing and increasing lack of affordable housing stock, meaning quality housing that is covered by vouchers. In addition, rents have increased beyond what vouchers can cover.
- Those with the lowest incomes and/or a history of mental illness/contact with the criminal justice system have difficulty finding a suitable rental unit because they are competing with households without similar backgrounds.
- Due to COVID, accessing resources has become more time consuming and difficult; processes are longer because nothing is done face-to-face or appointments are hard to get, and documentation is sent back and forth by mail.
- Stakeholders reported that application fees for each unit, in addition to common move-in costs such as first and last month's rent, and a security deposit, are barriers to both applying for and obtaining housing. Now with COVID, many people have lost jobs in the service industry, making move-in costs even more prohibitive.
- Poor credit history is often a barrier to housing and causes application denials. Stakeholders suggested financial literacy and credit counseling, perhaps with a certificate of completion to supplement negative credit history. Habitat of Pueblo currently offers quarterly financial literacy classes, and NeighborWorks of Southern Colorado offers budgeting/financial fitness counseling.
- There is also a need for accessible housing for persons with disabilities. Many of the improvements needed - wider doorways, lower countertops, roll-in showers - are

costly. The Center for Self-Reliance reported more than 100 disabled persons in their program unable to find accessible, affordable housing or emergency housing.

The Need for Smaller Units and Multifamily

- The greatest need for units is split between studio apartments and one-bedroom units and multi-family.
- Stakeholders stated in addition to the rising costs of building materials, the City's infrastructure requirements are extremely prohibitive.
- Indie Dwell, a nonprofit housing provider that converts shipping container into housing units, was proposed as a possibility to increase housing stock and make use of undevelopable lots. The Planning Department is working with them, but they currently do not meet the required number of design standards.
- Another program proposed by stakeholders was CHFA First Look, which provides the City with the opportunity to sell foreclosed properties to local nonprofit rather than conveying them back to HUD. This type of program helps nonprofits such as Habitat for Humanity build capacity.

Subsidized Housing

- While lawful source of income is a protected class by law, based on low vacancy rates, landlords are able to rent units without accepting vouchers. There is a need for education and outreach regarding fair housing.
- Stakeholders reported that there is a more than years-long waiting list for public housing. This is particularly an issue for elderly and disabled residents, who have passed away before finding placement.

Transportation

- There is a need for greater coordination among the City transit system and the regional systems to decrease time spent commuting. Given the current transit routes and connectivity between job centers and areas with affordable housing, it is costly for families with children because the parents/guardians need to pay for childcare not only for the time spent while at work but also during the time spent commuting, which could be a substantial length of time.

Homelessness and Homelessness Prevention

- Adding factors together - age, mental health disorders, criminal background - it becomes harder and harder to find housing, in a situation where there is very little potential housing to begin with.
- Stakeholders are finding that people are lingering in homelessness because it is very difficult to find a transitional bed, particularly among the elderly.

Meeting the Needs of the Homeless

Wednesday, March 17, 2021, at 10 AM

Permanent Supportive Housing, Transitional and Emergency Housing

- Stakeholders reiterated that increasing rents, particularly since COVID, are forcing people out of units and into homelessness.
- The City of Pueblo is not using the rapid re-housing method, though the VA does have rapid re-housing for Veterans. In terms of types of housing available:
 - Rescue Mission is a 92-person capacity homeless shelter for single men and women only.
 - The Right Place offers 35-units of permanent supportive housing, and is due to come online in 2022.
 - Posada is an 11-unit family shelter, and the City assisted Posada to house 22 families with TBRA to Posada.
 - YWCA have approximately 5-units dedicated to domestic violence victims.
 - Occasionally hotel vouchers, and 1500 HCV.
- The Rescue Mission is always at capacity, so in inclement weather there is a lack of emergency shelter. Staff stated that there are 2-3 people undergoing cancer treatment and in wheelchairs, and they have a high population of older people and medical issues.
- Also due to COVID, the capacity of temporary warming shelters has been reduced.
- There is a need for additional family shelter units. Families can stay for up to 2 months to allow them time to identify next steps and work through barriers, but due to COVID, families are staying longer if they are close to moving into permanent housing. Posada's Director stated that they consistently must turn away families.
- There is a need for both emergency housing and supportive services persons with challenges and health care needs following discharge from institutions; people are being discharged from hospitals, jail, or detox into homelessness, with needs that are difficult for shelters to address.

Social and Supportive Services

- A suggestion of a new program that may have a positive impact in Pueblo was the Rocky Mountain Service Employment Redevelopment (SER); they are applying for ESG funding to place community partners in schools to provide wrap-around services, including substance abuse providers, showers in schools, housing outside.
- There is a need for both emergency housing and supportive services persons with challenges and health care needs following discharge from institutions; people are being discharged from hospitals, jail, or detox into homelessness, with needs that are difficult for shelters to address.

Zoning and Infrastructure

- Stakeholders also cited the need for public infrastructure, including public water fountains and restrooms, to increase homeless access to clean water and hygiene.
- The City's 'no camping' zoning ordinance does not permit tiny homes as a means of increasing affordable housing units available, due to the issue of temporary vs. permanent structure.
- Local churches predate the zoning code and are zoned residential. Shelters are not permitted in residential areas, preventing faith-based organizations from offering overnight shelter for the homeless.

Education and Outreach

- There is a significant need for education and outreach among landlords to ensure that they are providing each applicant with a list of terms or conditions that will lead to denial. A better understanding of conditions leading to denial could assist with the application fee barrier in finding affordable housing.

Economic & Community Development

Tuesday, March 23, 2021, at 2 PM MST

Employment and Job-Readiness Training

- Stakeholders reported that Pueblo has a highly-educated, imported workforce; recruiting and retaining a proficient, professional-grade workforce (i.e., doctors, nurses, etc.) is a challenge due to lack of housing and available amenities, including quality, accessible childcare.

Neighborhood and Infrastructure Improvements/Amenities

- Increasing transit access, extending service routes and/or hours, was identified as a need. The current bus hours do not include evening/night, creating work schedule difficulties for employees reliant on public transit.
- Stakeholders identified Pueblo as a food desert, in need of additional grocery stores.
- Access to amenities, including recreation facilities and parks, could be improved by increasing the walkability of the area through additional sidewalks.
- Stakeholders commented that people are afraid to allow their children to play outside due to the presence of needles and suggested a neighborhood cleanup initiative.
- Broadband infrastructure was cited as an ongoing need throughout the community, particularly in Pueblo West.

Youth Job-Preparedness

- Youth needs include recreation activities, afterschool programs, and future workforce preparation/training and education.
- Programs such as the Boys and Girls Club's Workforce Development Program and Pueblo Community College's Mobile Training Lab address gaps in the City's workforce.

Childcare

- Stakeholders spoke about the need for affordable childcare of all ages, but particularly the 0-5 range.

Equal Housing for All

Wednesday, March 24, 2021, at 10 AM MST

Challenges faced by Low- and Moderate-Income Renters and Homeowners

- Stakeholders stated that most landlords understand fair housing laws, while many tenants – particularly the most vulnerable – do not know their rights. Tenant education and free clinics would assist with understanding tenant-rights, accessing the legal system, and solving landlord disputes.
- Barriers to finding rental units include soft credit issues (such as not paying utilities), stigma associated with mental health or disability, criminal background, and the fee associated with each application.
- While there is a new law to prevent discrimination based on source of income, stakeholders reported that it seems as though landlords overlook or discriminate against applicants with vouchers.
- Gentrification is occurring in Pueblo; competition for housing, combined with cash-buyers, make housing even more unaffordable to lower-incomes.

Homelessness and Homelessness Prevention

- Medical respite beds for persons being discharged from hospitals was cited as a high-priority need. There are currently 5 respite beds in Pueblo.
- Due to the barriers of finding rental units listed above, many are discouraged and believe they will not be accepted, so they do not apply. This contributes to extended homelessness.

CoC Resource Identification Committee

Tuesday, March 23, 2021, at 10 AM MST

Challenges to Affordable Housing

- While the most vulnerable, lowest-income households are experiencing difficulty finding homes in the community and there is a need for medical respite beds, more affordable housing is urgently needed overall. Stakeholders commented to everyone except the extremely wealthy are struggling to find housing, placing an undue burden on those at the lowest levels.
- HUD vouchers do not meet the full cost of renting. Housing that meets HUD's affordability limit and the limit of the vouchers is particularly needed. This is also an issue for rapid rehousing and homeless prevention programs that do not allow the use of funds for units above FMR.
- Zoning requirements impact the development of affordable housing greatly. Updating them with affordability in mind will greatly aid those working in affordable housing. Things that would help:
 - Improve coordination of departments.
 - Improve the process and flow so it is less disjointed.
 - Uniformity is appreciated—but keep developer costs in mind as set standards, e.g., “points” for appearance, etc.
 - Fund the Public Administrator position to assist with probate cases and other functions of the position.
- Create opportunities for developers and others that work in the areas of:
 - Elderly Care—including “aging in place.”
 - Respite care—transitional facilities for those with health challenges
- Ensure there is readily available information on how individuals can access the programs that will help them.

Equal Housing for All

- NIMBY attitudes in the community, such as the belief that the homeless population have come from elsewhere to access better services in Pueblo, need to be addressed by reinforcing the positive impacts of affordable housing and shelters.
- Rental application fees are a barrier to both applying for and obtaining housing. Reducing redundancies, such as instituting a single fee for to apply for more than one unit, and lowering excessive fees were to ways to make the process less cost-prohibitive.
- Stakeholders stressed the need to educate landlords on the benefits of affordable programs like vouchers, as well as how certain requirements are prohibitive to lower-income individuals (Example: Tenants must have 3x in income to rent).

Meeting the Needs of the Homeless

- There needs to be more of a safety net process for individuals with health challenges as they are discharged from area hospitals. It is often impossible to find adequate shelter for those that require care.

- Provider capacity is a big issue as well; more caregivers are needed onsite at shelters, as well as an additional 25-40 beds in emergency warming shelters during the winter.
- Area healthcare providers and others need information on transitional services to provide to clients or to advocate for them. For instance, there is 30-day bridge funding for transitional services and those requiring detox through ACF. However, there is also a waitlist for this assistance and so, the sooner people can begin the process, the better.
- Rocky Mountain Service Employment Redevelopment (RMSER) is in discussions with the City zoning and planning departments to transition two facilities/properties (2300 E 10th St, 2717 W St) into community empowerment centers, offering showers, laundry, food, Wi-Fi, bathrooms, job skills and education, and transitional housing.
- Stakeholders also added that skill development is needed to empower the homeless to improve their situations, as well as targeting entire families (versus focusing on children's services only).
- The Community has recently enrolled in the Built for Zero initiative and is beginning to use by-names lists; this will enable providers to capture the interaction in institutional settings and supply data to apply for additional funding.

Economic and Community Development

- Pueblo would be more attractive to developers with the following changes:
 - Zoning to reduce costs and complexity.
 - More mixed-use spaces.
 - More access to capital.
- There is a need for improvement to the City transit system in the form of greater coordination, expanded routes and hours, and increasing connectivity to job centers and amenities. Stakeholders advised that improving the transit system will make the community more attractive to developers and improve the work force.

Public Meeting

Thursday, March 25, 2021

1 PM

Challenges to Affordable Housing

- Developers become stuck in a cycle where they have gotten approvals from planning and zoning, then hit roadblocks with regional building that require additional costs. Zoning requirements need to be updated with affordable housing in mind, as well as improving coordination between departments (regional building, planning, zoning).
 - The zoning code was drafted in 1968. It has been edited over time, but it still only provides for residential and commercial. This creates an issue of where multifamily housing falls; it tends to be considered as commercial, with appearance requirements of commercial facilities that do not really apply to multifamily.

- Even if multifamily housing is considered as residential, a qualifying property must have 10 out of 15 elements to qualify. This can be difficult and costly, particularly if you are trying to build affordable housing.
- Lack of a public administrator position has created a bottleneck in the court system, preventing homes from getting through probate. Fund the Public Administrator position to assist with probate cases and other functions would address this issue.
- The City of Pueblo has a landbank, but it does not have the power to clear title; quieting title is a process that can take 6-18 months.

Meeting the Needs of the Homeless

- Medical respite - the need for facility-based respite, as well as shelter beds, wound care, medical beds, and med management (types of care that homeless care workers are not equipped for) - are a high-priority need.
- Higher quality data produced from the recent enrollment in the Built for Zero initiative will be used as a tool to convince hospitals to build affordable housing.

[To be updated following display period.]

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

[To be updated following display period.]

7. Summary

This plan outlines the goals of the City of Pueblo for its CDBG and HOME funds. Following outreach and public input, the 2021 Annual Action Plan clearly outline programs and activities that will address the identified needs. Despite the number of needs identified by stakeholders and the public, the City's CDBG and HOME programs are limited in funding. This document outlines the City's plans to maximize the investment of federal resources.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	PUEBLO	Department of Housing and Citizen Services
HOME Administrator	PUEBLO	Department of Housing and Citizen Services

Table 1 – Responsible Agencies

Narrative

The City of Pueblo's Department of Housing and Citizen Services administers the CDBG grant. The City of Pueblo and Pueblo County participate as a Consortium within the HOME Investment Partnerships Program (HOME). As the participating jurisdiction, the City of Pueblo undertakes all monitoring and reporting on behalf of Pueblo County. Pueblo County undertakes its affordable housing programs.

Consolidated Plan Public Contact Information

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

1. Introduction

The City of Pueblo's Department of Housing and Citizen Services developed an outreach effort to maximize input from a large cross-section of stakeholders. This outreach effort included public meetings, published meeting notices, and stakeholder/focus group meetings meant to engage a broad variety of stakeholders and City residents consistent with the Citizen Participation Plan.

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

Meaningful collaboration as it relates to the development and implementation of housing and community development programs and services has become increasingly important as the federal resources available to these programs are taxed by extraordinary cost increases. Collaboration with housing and service providers helps the City to capture the maximum benefit for each dollar it invests and ensures that investments strategically address both short-term needs and advance long-term goals.

The Department of Housing and Citizen Services conducts ongoing consultation with human services agencies, housing development organizations, and municipalities at various points in time during a program year.

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

Pueblo is a member of the statewide Colorado Coalition for the Homeless (Coalition) and receives funding through the statewide balance. The Colorado Balance of State Continuum of Care (BoS CoC) is represented locally by the various housing and service providers working to meet the needs of persons experiencing homelessness while also working to end homelessness. The City is in frequent communication with housing and service providers.

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

The City of Pueblo does not receive or administer ESG Funds. The City of Pueblo met with the Continuum of Care (COC) during the consultation process to coordinate between government, mental health, and other service agencies, and the Consolidated Plan reflects the same goals and objectives.

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

Table 2 - Agencies, groups, organizations who participated

1	Agency/Group/Organization	Health Solutions
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Services-Health Services - Victims Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
2	Agency/Group/Organization	Boys and Girls Clubs of Pueblo County
	Agency/Group/Organization Type	Services-Children Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
3	Agency/Group/Organization	HABITAT FOR HUMANITY OF PUEBLO, INC.
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
4	Agency/Group/Organization	Pueblo Empowerment Community Development Corporation
	Agency/Group/Organization Type	Services - Housing Services-Children
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
5	Agency/Group/Organization	CENTER FOR DISABILITIES, INC.
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
6	Agency/Group/Organization	NEIGHBORWORKS OF PUEBLO, INC.
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
7	Agency/Group/Organization	Pueblo Community Health Center
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
8	Agency/Group/Organization	Pueblo County Housing & Human Services Department
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with HIV/AIDS Services-homeless Services-Health Services-Employment Services - Victims
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
9	Agency/Group/Organization	Pueblo Food Project
	Agency/Group/Organization Type	Food security
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Food Security
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
10	Agency/Group/Organization	Pueblo Human Relations Committee
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Fair housing

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
11	Agency/Group/Organization	Pueblo Triple Aim Corporations
	Agency/Group/Organization Type	Health Advocacy
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Health Advocacy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
12	Agency/Group/Organization	Planning Department, City of Pueblo
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Other government - Local
	What section of the Plan was addressed by Consultation?	Market Analysis Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
13	Agency/Group/Organization	Pueblo School District
	Agency/Group/Organization Type	Services-Education
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
14	Agency/Group/Organization	Mayor's Office, City of Pueblo
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.

15	Agency/Group/Organization	Colorado housing Finance Agency
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
16	Agency/Group/Organization	First Presbyterian Church
	Agency/Group/Organization Type	Services-homeless Faith based organization
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
17	Agency/Group/Organization	Pueblo County Sheriff Office
	Agency/Group/Organization Type	Agency - Emergency Management
	What section of the Plan was addressed by Consultation?	Emergency Management
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
18	Agency/Group/Organization	Comcast
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers
	What section of the Plan was addressed by Consultation?	Economic Development Broadband
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency attended stakeholder sessions.
19	Agency/Group/Organization	Housing Authority of the City of Pueblo
	Agency/Group/Organization Type	PHA

What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Anti-poverty Strategy
Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was consulted by interview.

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

There were no agencies that the City did not consult.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	CoC	The goals are in alignment.
2021 Annual Plan for HACP	HACP	The goals are in alignment.

Table 3 - Other local / regional / federal planning efforts

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

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

On February 3, 2021, HUD issued a waiver allowing public hearings to be held virtually to allow for social distancing and limited public gatherings during a public health emergency. The City revised its Citizen Participation Plan to allow for virtual public meetings during public health emergencies. The City is continuing to follow local, state, and federal recommendations to limit public gatherings during the COVID-19 public health emergency. As such, the City is utilizing the waiver during the development of its Consolidated Plan and Annual Action Plan and will solicit public comment and conduct public hearings in a virtual way in accordance with its Citizen Participation Plan. Accommodations were made for persons with disabilities and persons with limited English proficiency.

The participation process included a survey, stakeholder sessions, a public meeting and will include a 30-day display period of the draft document followed by a second public hearing. This is in addition to outreach conducted in the fall of 2020 when the 2021 plan was first initiated. Because the 2021 plan is being submitted soon after the 2020-2024 Consolidated Plan and 2020 Annual Plan, the feedback received during the Con Plan process is relevant and included below. Feedback received from stakeholders and the public helped shape the priority needs identified in the plan.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of Comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/ broad community	NA	NA	NA	
2	Stakeholder session	Housing and Service Providers	March 16 at 2pm; Challenges to Affordable Housing; 8 attendees	See participation appendix	All comments were accepted	http://pueblo.zoom.us/j/98351581834
3	Stakeholder session	Housing and Service Providers	March 17 at 10am; Meeting the Needs of the Homeless; 12 attendees	See participation appendix	All comments were accepted	http://pueblo.zoom.us/j/92754723460
4	Stakeholder session	Housing and Service Providers	March 23 at 2pm; Economic & Community Development; 11 attendees	See participation appendix	All comments were accepted	http://pueblo.zoom.us/j/97765797766

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of Comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Stakeholder session	Housing and Service Providers	March 24 at 10am; Equal Housing for All; 7 attendees	See participation appendix	All comments were accepted	http://pueblo.zoom.us/j/97983119577
6	Newspaper Ad	Non-targeted/ broad community	NA	NA	NA	
7	Public Meeting	Non-targeted/ broad community	June 7 meeting	June 7 meeting	June 7 meeting	
8	Newspaper Ad	Non-targeted/ broad community	NA	NA	NA	
9	Public Hearing	Non-targeted/ broad community	TBD after June 24, 2021 Public Hearing	TBD	TBD	

Table 4 - Citizen Participation Outreach

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

Introduction

The following CDBG and HOME funds are expected for be available for the FY2021.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,504,131	0	0	1,504,131	4,512,393	The expected amount remaining is three times the 2021 allocation.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	852,826	438,476	0	1,291,302	2,558,478	The expected amount remaining is three times the 2021 allocation.

Table 2 - Expected Resources – Priority Table

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

The City and County currently fund over 45 non-profit agencies through the Community Services Advisory Commission. This group makes funding recommendations to the governing bodies. Over \$10 million in general funds have been granted to local agencies that serve the Pueblo community. These are general revenue funds, and allocations are made during the yearly budget process. Based on historical funding, \$6.5 million will be made available to local non-profits over the next five years.

The City and County of Pueblo as the Pueblo Consortium matches the HOME Investment Partnership Act grant with general funds. HOME funds are leveraged well with LIHTC developments as they are awarded in the jurisdiction. In addition the Consortium will use qualifying affordable housing expenditures made by each entity as match and has some funds that it carries forward from prior years. Leveraging of private and non-federal resources will be sought whenever possible.

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

Through the Department of Housing and Citizen Services the City accepts the donation of property for the purposes of housing development. The properties are placed in the Vacant Lot Recycle Program. Many of these donations are from individuals that can no longer afford to maintain the properties, or who do not wish to maintain them. The properties are made available to local housing providers, contractors, and to low and moderate-income households for the development of affordable housing.

The City currently owns 13 vacant parcels. Some of these parcels are being land banked under the Neighborhood Stabilization Program and others have been donated as discussed above.

Annual Goals and Objectives

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Acquisition for/rehabilitation of housing	2020	2024	Affordable Housing	Citywide Countywide	Affordable Housing	HOME: \$50,000	Homeowner Housing Rehabilitated: 2 housing units
2	New construction of affordable housing	2020	2024	Affordable Housing	Citywide	Affordable Housing	HOME: \$987,638	Homeowner Housing Added: 8 Household Housing Unit Rental Units Constructed: 1 housing unit
3	Preserve existing affordable units (rehab)	2020	2024	Affordable Housing	Citywide	Affordable Housing	CDBG: \$147,475 HOME: \$127,924	Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: 25 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Provide housing and services to homeless/ near	2020	2024	Affordable Housing Homeless	Citywide	Public Services including Services for Homeless	CDBG: \$155,000	Public service activities other than Low/Moderate Income Housing Benefit: 2,075 Persons Assisted
5	Provide public services to non-homeless population	2020	2024	Affordable Housing Non-Homeless Special Needs Non-Housing Community Development	Citywide	Public Services including Services for Homeless	CDBG: \$70,000	Public service activities other than Low/Moderate Income Housing Benefit: 405 Households Assisted
6	Improve and maintain public infrastructure and fac	2020	2024	Non-Housing Community Development	Citywide	Public Infrastructure and Facilities	CDBG: \$680,830	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2,637 Persons Assisted
7	Eliminate slum and blighting influences	2020	2024	Affordable Housing Non-Housing Community Development	Citywide	Economic Development and Community Revitalization	CDBG: \$150,000	Buildings Demolished: 2 Buildings

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
	Planning and administration of federal programs	2020	2024	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Citywide Countywide	Administration and Planning	CDBG: \$300,826 HOME: \$125,741	Other: 3 Other

Table 3 – Goals Summary

Goal Descriptions

1	Goal Name	Acquisition for/rehabilitation of housing
	Goal Description	Acquisition and rehabilitation of housing
2	Goal Name	New construction of affordable housing
	Goal Description	New construction of affordable housing units
3	Goal Name	Preserve existing affordable units (rehab)
	Goal Description	Rehabilitation/reconstruction of single and multi-family housing; energy efficiency improvements; accessibility modifications; lead based paint hazard testing and abatement; minor repairs; and preservation of affordable units.
4	Goal Name	Provide housing and services to homeless/ near homeless
	Goal Description	Housing and services for homeless and near homeless include outreach, emergency, transitional and permanent supportive housing, Rapid Re-Housing, supporting services and rental assistance
5	Goal Name	Provide public services to non-homeless population
	Goal Description	Other public services that are needed include: housing and services for persons with HIV/AIDS; services for persons with physical, developmental and/or intellectual disabilities; employment and workforce development; screening for lead-based paint hazards; housing counseling; neighborhood clean-up programs; crime awareness and prevention programs; transportation; health and mental health services; services for persons recovering from addiction; youth programs, food banks and other food-related services; childcare and related services; senior programs and related services; legal services; and financial literacy.
6	Goal Name	Improve and maintain public infrastructure and facilities
	Goal Description	Public facilities include neighborhood facilities, parks/recreation facilities, parking facilities, senior and youth facilities, childcare facilities, job training facilities, cultural facilities, non-residential historic preservation, and homeless facilities. Public infrastructure includes street and sidewalk improvements including lighting and streetscaping, water and sewer improvements, flood drainage improvements, solid waste management improvements.

7	Goal Name	Eliminate slum and blighting influences
	Goal Description	Demolition of vacant and dilapidated structures that pose a threat to health and safety, code enforcement, and graffiti removal and façade improvement programs.
	Goal Name	Planning and administration of federal programs
	Goal Description	Planning and administration is required for the successful implementation of CDBG and HOME programs.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)

Over the next year, the City expects to assist the following extremely low-income (ELI, 0-30% AMI), low-income (LI, 31-50% AMI) and moderate-income (MI, 51-80% AMI) households using HOME dollars:

- TBRA - 10 ELI, 5 LI, 2 MI
- New Unit Construction - 3 LI, 2 MI
- Acquisition Rehab - 1 MI
- Rehabilitation - 4 ELI, 4 LI, 2 MI
- Homebuyer/In-fill Programs - 2 MI

Note that TBRA recipients will be funded during FY2021 but will be assisted using older funds.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The following is a list of the planned projects that will be funded with CDBG and HOME funds.

#	Project Name
1	CD2101 Program Administration
2	CD2102 Homeless Shelter
3	CD2103 Homeless Supportive Services Program
4	CD2104 Homeless Youth Outreach
5	CD2105 Home Stability Program
6	CD2106 Meal Program
7	CD2107 SRDA Transportation
8	CD2108 Muni Court Boot Camp
9	CD2109 Eastside Club House
10	CD2110 Food Sack program
11	CD2111 Demolition Program
12	CD2112 Sunny Side Neighborhood ADA Improvements
13	CD2113 Grove Neighborhood Infrastructure Improvements
14	CD2114 Emergency Housing Rehabilitation for Seniors
15	CD2115 Minor Repairs Program
16	CD2116 ADA Ramps - Citywide
17	HO2110 City Administration
18	HO2120 Pueblo County Administration
19	HO2130 Pueblo County Housing Programs
20	HO2140 CHDO Set-Aside
21	HO2150 Housing Programs

Table 4 – Project Information

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

There are no specially identified target areas for allocating CDBG and HOME resources. CDBG funds will be expended within the City of Pueblo while HOME funds will be used in citywide as well as in the County. HOME funds are divided between the City and County. City HOME funds are spent within the City while County funds could be spent in either the City or

County depending on the projects being funded. Funds are allocated in alignment with the identified priority needs and associated goals.

The primary obstacle in meeting the needs of the community is available resources as the need will always outpace the availability of resources. The City and County leverage funds to the extent possible and select projects based on the potential impact to the community.

AP-38 Project Summary

Project Summary Information

1	Project Name	CD2101 Program Administration
	Target Area	Citywide
	Goals Supported	Planning and administration of federal programs
	Needs Addressed	Administration and Planning
	Funding	CDBG: \$300,826
	Description	Administrative and planning activities associated with the CDBG program and fair housing education and outreach.
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	2631 E 4 th Street, Pueblo, CO 81001 (CT11, BLK 1)
	Planned Activities	Administrative and planning activities associated with the CDBG program as well as fair housing education and outreach.
2	Project Name	CD2102 Homeless Shelter
	Target Area	Citywide
	Goals Supported	Provide housing and services to homeless/ near homeless
	Needs Addressed	Public Services including Services for Homeless
	Funding	CDBG: \$40,000
	Description	Pueblo Rescue Mission programs are targeted in three distinct areas of service to the homeless: Shelter, Food and Resources (Navigation Center). All resources are focused on achieving three outcomes for a homeless individual: securing housing, retaining good health and obtaining work. CDBG funds will be used to support staffing that is critical to the facilitation and delivery of PRM's programs: Executive Director 1.0 FTE (25%), Program Coordinator 1.0 FTE (50%), Case Manager 1.0 FTE (50%), Kitchen Coordinator 1.0 FTE (50%) and support of PRM Operations Budget (20%)
	Target Date	2/28/2022

	Estimate the number and type of families that will benefit from the proposed activities	Provide shelter and services to 200 unduplicated individuals throughout the year.
	Location Description	Permanente Shelter located at 728 W 4 th Street, Pueblo, CO (CT35, BLK 1)
	Planned Activities	CDBG funds will be used to support staffing that is critical to the facilitation and delivery of PRM's programs: Executive Director 1.0 FTE (25%), Program Coordinator 1.0 FTE (50%), Case Manager 1.0 FTE (50%), Kitchen Coordinator 1.0 FTE (50%) and support of PRM Operations Budget (20%).
3	Project Name	CD2103 Homeless Supportive Services Program
	Target Area	Citywide
	Goals Supported	Provide housing and services to homeless/ near homeless
	Needs Addressed	Public Services including Services for Homeless
	Funding	CDBG: \$50,000
	Description	Funding will be used to provide supportive services to low-income, the newly unemployed and homeless families and individuals. Supportive services include comprehensive case management services, basic needs assistance and referrals and support.
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	Provide service and case management to 1,000 unduplicated individuals over the course of the year.
	Location Description	Services offered at 501 Belmont Ave, Pueblo, CO 81004 (CT18, BLK 1)
Planned Activities	Supportive services include comprehensive case management services, basic needs assistance and referrals and support.	
4	Project Name	CD2104 Homeless Youth Outreach
	Target Area	Citywide
	Goals Supported	Provide housing and services to homeless/ near homeless
	Needs Addressed	Public Services including Services for Homeless
	Funding	CDBG: \$20,000

	Description	Funding will be used for the provision of case management and services for homeless youth, including emergency shelter, transitional housing supportive services, basic services, transportation, assistance with IDs and birth certificates, reunification, case management in conjunction with housing, education and employment services, life skills classes, and supplies for the homeless youth.
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	Provide service and case management to 125 unduplicated individuals over the course of the year.
	Location Description	Services offered at 501 Belmont Ave, Pueblo, CO 81004 (CT18, BLK 1)
	Planned Activities	Funding will be used for the provision of case management and services for homeless youth, including emergency shelter, transitional housing supportive services, basic services, transportation, assistance with IDs and birth certificates, reunification, case management in conjunction with housing, education and employment services, life skills classes, and supplies for the homeless youth.
5	Project Name	CD2105 Home Stability Program
	Target Area	Citywide
	Goals Supported	Provide housing and services to homeless/ near homeless
	Needs Addressed	Public Services including Services for Homeless
	Funding	CDBG: \$25,000
	Description	Home Stability program, which has been in operation since 1967, benefits City of Pueblo residents by helping them navigate the legal and financial landscape, with the goal of creating stable and sustainable housing and neighborhoods. CCDP advocates for people who may not have the skills to negotiate with lenders who might take advantage of persons unfamiliar with consumer protection laws. CCDP works to protect the interests of clients with banks, credit agencies, and landlords. Clients are City of Pueblo residents who are especially vulnerable to becoming homeless due to disabilities, lack of support systems, and limited incomes.
	Target Date	2/28/2022

	Estimate the number and type of families that will benefit from the proposed activities	Provide service and case management to 110 unduplicated households over the course of the year.
	Location Description	Services are offered at 429 W 10 th Street, Pueblo, CO 81003 (CT6, BLK 1)
	Planned Activities	Services include a unique financial counseling course that includes setting goals, developing action plans, reaching outcomes, and accessing follow up support when needed. Counseling is not ongoing but targeted to specific HUD outcomes such as mortgage brought current, mortgage refinanced, or found alternative rental housing.
6	Project Name	CD2106 Meal Program
	Target Area	Citywide
	Goals Supported	Provide housing and services to homeless/ near homeless
	Needs Addressed	Public Services including Services for Homeless
	Funding	CDBG: \$20,000
	Description	The purpose of the program is to provide a community meal to individuals who are homeless and/or needing a meal. In response to the elimination of the only evening meal served in the Pueblo community, the Pueblo Rescue Mission will provide a daily meal Monday through Sunday in the evening. The meal will be open to anyone in Pueblo in need of a meal (include men, women, and children).
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	Provide 2000 meals to homeless individuals throughout the year (approximately 400 unduplicated individuals)
	Location Description	Services are offered at 728 W 4 th Street, Pueblo, CO 81003 (CT35, BLK 1)
	Planned Activities	Funds will be used to provide personnel support for the Community Meal Program services.
7	Project Name	CD2107 SRDA Transportation
	Target Area	Citywide
	Goals Supported	Provide public services to non-homeless population
	Needs Addressed	Public Services including Services for Homeless
	Funding	CDBG: \$13,774

	Description	The SRDA Transportation program will purchase one (1) twelve passenger, five (5) wheelchair position equipped vehicle. The CDBG funding would secure the 20% needed for the local match, to secure the procurement of the vehicle. CDOT (Colorado Department of Transportation) would pay the other 80%. SRDA is in a vehicle replacement schedule; this enables us to replace older, higher cost vehicles to operate, higher mileage vehicle in our fleet.
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	The program will provide services to 125 unduplicated City residents throughout the year.
	Location Description	Citywide
	Planned Activities	Local match to needed to purchase a replacement vehicle.
8	Project Name	CD2108 Muni Court Boot Camp
	Target Area	Citywide
	Goals Supported	Provide public services to non-homeless population
	Needs Addressed	Public Services including Services for Homeless
	Funding	CDBG: \$8,500
	Description	The Court added the Youth Development Boot Camp to its youth diversion programs in 2018 to meet the needs of youth who require more extensive intervention. The Youth Development Boot Camp (YDBC) is a six week re-conceptualized boot camp and collaborative community project for at-risk juveniles between the ages of 12 and 15 who generally have two or more cases pending in Municipal Court and/or have been identified by school counselors, school resource officers, family members or probation as candidates for the program because of high risk behavior. Successful graduation from boot camp will satisfy all outstanding fines, costs and classes currently owed to Municipal Court by each of the participants.
	Target Date	2/28/2022

	Estimate the number and type of families that will benefit from the proposed activities	Twenty individuals will participate in the program.
	Location Description	201 S Main Street, Pueblo, CO 81003 (CT35, BLK 1)
	Planned Activities	Participants will receive academic, bio-behavioral (physical fitness) and psycho-social-emotional support daily with the goal of improving academic performance and social behavior; reducing drop-out rates, truancy, teen pregnancy, and gang involvement; and preventing future unlawful behavior. Participants will be expected to attend camp every day and will be curriculum developed with the help of our collaborative partners. YDBC's objective is to instill each participant with self-discipline, self-control and self-confidence through consistent accountability and motivational counseling to enable them to make positive life choices during and after boot camp.
9	Project Name	CD2109 Eastside Club House
	Target Area	
	Goals Supported	Provide public services to non-homeless population
	Needs Addressed	Public Services including Services for Homeless
	Funding	CDBG: \$22,726
	Description	Funds will be used to provide staff to assist in programs geared toward preventing learning loss among low- and moderate-income youth participating in programs run by the Boys and Girls Club of Pueblo County's East Side Clubhouse.
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	The program will provide services to 150 unduplicated students throughout the year.
	Location Description	CTs 8, 10, 11 and 12
Planned Activities	Support in preventing learning loss among low- and moderate-income youth.	
10	Project Name	CD2110 Food Sack program
	Target Area	Citywide
	Goals Supported	Provide public services to non-homeless population

	Needs Addressed	Public Services including Services for Homeless
	Funding	CDBG: \$25,000
	Description	The Food Sack program/Nutrition on Wheels (NOW) project prepares and packages food sacks for client pick-up or delivery. Primary food sacks contain nutritional foods such as beans, rice, flour, sugar, meats, breads, cereals, canned goods and other items. The contents are carefully planned and prepared to ensure nutritional value and vary depending on the type of sack being prepared.
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	The program will provide meal services to 150 unduplicated individuals throughout the year.
	Location Description	
	Planned Activities	CDBG funds will be used to fund staff positions integral to the food sack and NOW projects.
11	Project Name	CD2111 Demolition Program
	Target Area	Citywide
	Goals Supported	Eliminate slum and blighting influences
	Needs Addressed	Economic Development and Community Revitalization
	Funding	CDBG: \$150,000
	Description	This projects entails the demolition of vacant and dilapidated structures deemed unsafe for human habitation and that pose a threat to health of safety of residents.
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	The program will raze (2) dangerous structures with this funding.
	Location Description	Citywide, Low-Mod Areas only
	Planned Activities	This project will demolish buildings which have been deemed unsafe by the Pueblo Regional Building Department. The demolition will include abatement of any asbestos containing material as required by the Colorado Department of Health and Environment prior to demolition of the buildings.

12	Project Name	CD2112 Sunny Side Neighborhood ADA Improvements
	Target Area	Citywide
	Goals Supported	Improve and maintain public infrastructure and fac
	Needs Addressed	Public Infrastructure and Facilities
	Funding	CDBG: \$100,000
	Description	
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	505 Low to Moderate Income individuals will benefit from the infrastructure improvements.
	Location Description	CT28, BLK 2
	Planned Activities	ADA improvements to city sidewalk, C&G, and curb ramps.
13	Project Name	CD2113 Grove Neighborhood Infrastructure Improvements
	Target Area	
	Goals Supported	Improve and maintain public infrastructure and fac
	Needs Addressed	Public Infrastructure and Facilities
	Funding	CDBG: \$180,830
	Description	The proposed project will make significant infrastructure improvements to increase safety, walkability, and decrease blight within one of the oldest neighborhoods in Pueblo. The proposed project will allow resident:; and visitors of the Grove neighborhood to have access to parks, amenities, and homes without increased risk of injury due to dilapidated or non-existent infrastructure. The neighborhood improvements will also promote walkability, livability and physical activity throughout the neighborhood to help build a positive image of Pueblo.
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	75 Individuals will benefit from the infrastructure improvements.
	Location Description	Grove Neighborhood, CT 35 BLK 1

	Planned Activities	The proposed project is to complete sidewalk, curb, and gutter repair along certain sections of B Street, C Street, D Street, Plum Street. The proposed project also requests the completion of ADA compliant curb ramps on certain corners of the cross streets of Plum Street and C Street, Clark Street and C Street, Spring Street and C Street, and D Street and Spring Street.
14	Project Name	CD2114 Emergency Housing Rehabilitation for Seniors
	Target Area	Citywide
	Goals Supported	Preserve existing affordable units (rehab)
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$45,000
	Description	The ERESP program is a successful emergency rehab project that is now in its 19th year. The program has assisted over 873 senior citizens. The CDBG funds will be used to augment the cost of providing the emergency repairs to low-income senior households. All of the CDBG funds will be utilized within the Pueblo City limits. ERESP provides emergency repairs to situations such as faulty plumbing, no water, no heat, faulty electrical wiring, leaking roofs and a myriad of other emergency situations. Additionally, there has been a tremendous increase in demand for accessibility modification such as handrails, ramps, handicapped showers, and grab bars.
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	Eight household will benefit from the program.
	Location Description	Citywide
	Planned Activities	ERESP provides emergency repairs to situations such as faulty plumbing, no water, no heat, faulty electrical wiring, leaking roofs and a myriad of other emergency situations. Additionally, there has been a tremendous increase in demand for accessibility modification such as handrails, ramps, handicapped showers, and grab bars.
15	Project Name	CD2115 Minor Repairs Program
	Target Area	Citywide
	Goals Supported	Preserve existing affordable units (rehab)
	Needs Addressed	Affordable Housing

	Funding	CDBG: \$102,475
	Description	Repairs to low- to moderate-income, owner occupied, housing. The Minor Repair Program was established in 2009 and was designed to make singular type repairs in people's homes that cannot afford to make the repairs themselves. The program restores service to the home, makes necessary improvements to the habitability of the home, and/or increases the longevity of the home through restoration of deferred maintenance.
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	(17) Owner-Occupied households will be assisted will be assisted through code compliant housing repairs during the course of the year.
	Location Description	Citywide
	Planned Activities	Each individual Minor Repair project is capped at \$5,000 and can repair one item in the home or one category within the home such as a replacing an exterior door as a single item or replacing the water supply lines throughout the home as an item within the Plumbing category. The assistance provided in the program is a grant. Eligible repairs include: mechanical/electrical/plumbing systems, safety and security, handicap accessibility, exterior residence appearance and weatherization.
16	Project Name	CD2116 ADA Ramps - Citywide
	Target Area	Citywide
	Goals Supported	Improve and maintain public infrastructure and facilities
	Needs Addressed	Public Infrastructure and Facilities
	Funding	CDBG: \$400,000
	Description	Install ADA compliant accessible curb ramps at street intersections and crosswalks throughout the City of Pueblo. The project will entail replacement of existing curb and gutter, concrete cross pans, asphalt repair, striping, decorative concrete and retaining walls, signage, disturbed landscaping, and irrigation. Project may include the relocation of existing street lighting, signal lights, associated electrical boxes and wiring. Relocation of adjacent utilities may be required to complete the proposed project.
	Target Date	2/28/2022

	Estimate the number and type of families that will benefit from the proposed activities	It is expected that 2,057 low- and moderate-income persons will benefit from this activity. These individuals represent 77% of the population in the selected neighborhoods.
	Location Description	ADA curb ramps and accessibility improvements will be made along Abriendo Avenue from Washington Street to Cleveland Avenue. This is in US Census tracts/block groups: 14/1, 15/1, 19/1, and 19/2.
	Planned Activities	The project will entail replacement of existing curb and gutter, 7" concrete cross pans, 4" asphalt repair, striping, decorative concrete and retaining walls, signage, disturbed landscaping, and irrigation. Project may include the relocation of existing street lighting, signal lights, associated electrical boxes and wiring. Relocation of adjacent utilities may be required to complete the proposed project.
17	Project Name	HO2110 City Administration
	Target Area	Citywide
	Goals Supported	Planning and administration of federal programs
	Needs Addressed	Administration and Planning
	Funding	HOME: \$114,654
	Description	Administration of the HOME program
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Citywide, Activities conducted at 2631 E 4 th Street, Pueblo, CO 81001
	Planned Activities	Administration of the HOME program
18	Project Name	HO2120 Pueblo County Administration
	Target Area	Countywide
	Goals Supported	Planning and administration of federal programs
	Needs Addressed	Administration and Planning
	Funding	HOME: \$11,086
	Description	Administration of the HOME program
	Target Date	2/28/2022

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Countywide, Activities conducted at 2631 E 4 th Street, Pueblo, CO 81001
	Planned Activities	Administration of the HOME program
19	Project Name	HO2130 Pueblo County Housing Programs
	Target Area	Citywide
	Goals Supported	
	Needs Addressed	Affordable Housing
	Funding	\$83,150
	Description	This includes a range of activities including TBRA, new construction, rehabilitation, acquisition/rehab, in-fill development and other housing activities allowed by HOME regulations.
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that two homeowner units will be rehabilitated and 1 new rental unit constructed.
	Location Description	
	Planned Activities	This includes a range of activities including TBRA, new construction, rehabilitation, acquisition/rehab, in-fill development and other housing activities allowed by HOME regulations.
20	Project Name	HO2140 CHDO Set-Aside
	Target Area	Citywide
	Goals Supported	Preserve existing affordable units (rehab)
	Needs Addressed	Affordable Housing
	Funding	HOME: \$127,924
	Description	Each HOME grantees is required to set-aside 15% of the HOME grant to be used by a CHDO for the purpose of affordable housing.
	Target Date	2/28/2022

	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	2124 Lake Avenue, Pueblo, CO 81004 CT 23 BLK 1
	Planned Activities	The 2021 CHDO set-aside will be used to support the rehabilitation of the Sunset Motel to create SROs for income-eligible seniors. Of the proposed 17 units, 10 will be funded with HOME dollars with a 30/70 split among CHDO set-aside and other HOME funds.
21	Project Name	HO2150 Housing Programs
	Target Area	Citywide
	Goals Supported	New construction of affordable housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$954,488
	Description	This includes a range of activities including TBRA, new construction, rehabilitation, acquisition/rehab, in-fill development and other housing activities allowed by HOME regulations.
	Target Date	2/28/2022
	Estimate the number and type of families that will benefit from the proposed activities	Eight households up to 80% AMI will be assisted with in-fill development, five units of rental units constructed and 7 units of rehabbed renter units will be supported with HOME funds.
	Location Description	
Planned Activities	The City will use its HOME allocation in support of infill construction of eight affordable homeowner units for low- and moderate-income homeowners over several years. HOME funds will also support the rehab of Sunset Motel into rental units for seniors and five units of renter units constructed.	

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

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

There are no identified geographic priorities within the City or County where funds will be expended as described below.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	96%
Countywide	4%

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The majority of funds will be allocated in the City of Pueblo because only the City receives CDBG funds so all of those funds will be expended within the City. The HOME funds are divided between the City and County with the vast majority going to the City. Within the City, funds are allocated in different neighborhoods to meet the needs of residents throughout the City.

Affordable Housing

AP-55 Affordable Housing - 91.420, 91.220(g)

Introduction

The following tables outline the affordable housing goals funded with CDBG and HOME funds using 2021 dollars.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	46
Special-Needs	0
Total	46

Table 6 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	9
Rehab of Existing Units	37
Acquisition of Existing Units	0
Total	46

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

Per 91.220(1), there are some program-specific requirements for HOME as described below. Eligible applicants for HOME-funded programs are all low- and moderate-income households residing in the City or County or projects that are to be completed by developers, for example, that seeks to construct or rehabilitate units that are income-restricted. This includes applications for HOME funds in support of Low Income Housing Tax Credit (LIHTC) projects or RAD conversions undertaken by the Housing Authority.

HOME applications will be taken only when Notice of Funding Availability (NOFA) notices are published. DHCS will review HOME Program applications in accordance with the Application checklist and on the following criteria:

- Affordable Housing Experience: Capacity must be demonstrated by including an application that identifies all necessary components to accomplish the development, e.g., effective control of sites for acquisition and construction developments, the financial capacity to repay the HOME loan and other financial arrangements, as well as comprehensive program design. DHCS's HOME Program staff will conduct reviews of:
 - a. Previous performance under the HOME Program and other related programs, including disbursements, monitoring and findings.
 - b. Relevant experience in administering housing programs.
 - c. Relevant experience in developing and managing housing programs and.
 - d. Size of staff relative to all other program responsibilities.
- Housing Need Factor: The need factor pertains to percentages of the city's lower income households, the percentage of households with housing costs greater than thirty percent (30%) of area median family income adjusted for family size.
- Financing: DHCS places a strong emphasis on projects that will include the use of funds from other sources. All costs will be examined for reasonableness, and applicants may be denied if costs are deemed unreasonable.

The Consortium will not issue a funding commitment until all other commitments are in place. Proof of these commitments will be required prior to Council approval and execution of contracts.

- Readiness: The purpose of the application process is to allocate funds to eligible applicants for proposed projects. Applicants applying for HOME Program funds must begin their developments within ninety (90) days of the notice to proceed. Developments that do not begin within ninety (90) days are subject to have all HOME Program funds recaptured and reallocated to other eligible activities unless otherwise approved by DHCS. DHCS realizes that there may be extenuating circumstances that may delay the beginning of a project. Such circumstances will be reviewed on a case-by-case basis.

Information regarding the HOME program and application materials can be found at: <https://www.pueblo.us/257/Documents-Forms> on the City's webpage.

Program and services funding available through the CDBG Program is awarded through an annual NOFA process published in the *Pueblo Chieftain* newspaper in both English and Spanish. The completed funding applications are reviewed by the Citizen Advisory Committee, a volunteer group of citizens who evaluate the funding requests with respect to the needs and goals established in the Consolidated Plan. Successfully funded programs have developed client eligibility criteria. Eligible clients are served on a first-come, first-served basis after a completed application is received, or upon successfully demonstrating the individual program criteria for service has been met.

AP-60 Public Housing - 91.420, 91.220(h)

Introduction

The following actions planned will address the needs to public housing.

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

Per its 2021 Annual Plan, the HACP has leveraged private and other public funds to begin construction on Mountain View Townhomes, consisting of 51 new affordable housing units. Mountain View Townhomes are the second of a four-phase project to demolish and replace the 212-unit Sangre de Cristo Apartments. Phase one of the project, construction of the 72-unit Uplands Townhomes, has been completed.

Public housing residents also may have needs for reasonable accommodations. The most requested accommodation is related to assistance animals. Other identified needs and requests are lawn mowing and yardwork assistance among elderly and disabled residents and requests for additional bedrooms has increased recently. There are also requests made for grab bars, wheelchair ramps, walk in showers, flat units, and transfers for various reasons. The Housing Authority has met its Section 504 requirements and has 74 ADA units, 4 for sensory impairment.

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

HACP continues to try to increase resident involvement in management by providing regular resident meetings where residents can express concerns to housing management. The Agency maintains a strong working relationship with the City-wide resident organization, which provides resident involvement in strategic and agency planning.

HACP also administers the Family Self-Sufficiency Program, which is a five-year voluntary program for participants in both the Housing Choice Voucher and the Public Housing programs. The program is designed to help individuals with improving their economic status by reducing their dependence on public assistance. There are currently 40 Public Housing and 18 HCV participants in the program. Since October 1998, there have been 218 FSS contracts completed.

The Family Self Sufficiency Coordinator will assist with developing an individualized plan leading to self-reliance and identifying the steps and activities that need to be taken to reach those goals.

There are various referrals to supportive social services such as childcare, job preparation, credit counseling, education, home ownership, transportation, and vocational training

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not applicable as the HACP is not designated as troubled.

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Introduction

This section describes the goals and actions for reducing and ending homelessness.

The City of Pueblo does not receive ESG funds though the City utilizes a portion of its CDBG funds for public services in support of persons experiencing homelessness or who are at risk of becoming homeless. This includes CDBG-funded projects such as youth outreach, homeless prevention and operating costs for housing providers. Additionally, the City will utilize CDBG-CV funds in support of household at risk of homelessness who have been impacted by the COVID-19 pandemic.

The Pueblo CoC has goals for assisting for families and individuals experiencing or at-risk of homelessness that are consistent with the BoS goals:

- Expand access to quality, integrated health care
- Expand housing opportunities
- Improve public policy and community engagement towards ending homelessness
- Develop a highly trained, equipped and engaged Colorado Coalition for the Homeless (CCH) workforce
- Improve CCH's financial stability.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The Pueblo CoC, which is part of the Colorado Balance of State, has a long-term goal of decreasing the number of persons experiencing homelessness by moving individuals and families from homelessness into permanent housing. To achieve this objective, the CoC meets regularly to monitor, discuss ongoing needs and issues that affect those impacted by homelessness. The CoC has been discussing impacts of COVID-19 and how housing and services for persons experiencing homelessness may be affected when the various eviction moratoria are lifted. Posada serves as the lead CoC agency and provides outreach to assess the individual needs of those experiencing homelessness. The CoC is engaging in the Built for Zero campaign, which is an approach that seeks to end homelessness using a By-Names list for each subcategory (i.e. veterans, families, etc.).

Addressing the emergency shelter and transitional housing needs of homeless persons

Posada and the Pueblo Rescue Mission on a limited basis provides homeless outreach to local camps and areas of town where individuals become stranded, i.e., railroad tracks, interstate, and Fountain Creek. The team includes medical and mental health professionals; veteran's representatives; retired Medevac personnel and law enforcement. Documentation is made of the camps including pictures of the camps and its occupants. Basic needs are offered that include basic medical care. Resources and referrals, which include shelter, are provided to individuals and families. The goal of the outreach program is to build trust among the homeless street population and to get those individuals to care so that they can ultimately move off the street.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Funding has been and remains the primary obstacle to the expansion of housing and services to persons and families experiencing homelessness and to those who are at-risk of becoming homeless. This will likely remain the case as the various eviction moratoria are lifted and the number of evictions is likely to increase. The City of Pueblo will continue to invest CDBG funds to provide services.

The Pueblo CoC has goals for assisting for families and individuals experiencing or at-risk of homelessness that are consistent with the BoS goals:

1. Expand access to quality, integrated health care
2. Expand housing opportunities
3. Improve public policy and community engagement towards ending homelessness
4. Develop a highly trained, equipped and engaged Colorado Coalition for the Homeless (CCH) workforce
5. Improve CCH's financial stability.

Local agencies working to end homelessness work together to provide services and housing. One of the greatest current challenges is finding safe, affordable units into which individuals and families can be placed. The City will continue its participation in the Continuum of Care and support the Pueblo CoC in seeking additional funding.

In 2019, the City established a 92-bed homeless shelter in 2019 to assist in meeting the emergency shelter needs of persons experiencing homelessness.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

At-risk populations consist of those individuals being released from a correctional system, the Colorado Mental Health Institute and youth transitioning out of foster care. The City's Tenant-Based Rental Assistance Program targets these populations with its funding. All three systems have a discharge plan, which includes short-term funding for housing. The problem arises when these individuals have exhausted the program available resources but have not achieved self-sufficiency. These individuals are eventually served by member of the CoC.

Stakeholders note the continued need to engage healthcare institutions in following the discharge policies and ensuring that persons with high levels of medical needs are not directly discharged into homelessness. If they are, there is a need for medical respite beds in emergency shelters to meet the individuals' needs.

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

Introduction

A newly revised Analysis of Impediments to Fair Housing Choice is currently underway and will be finalized in late 2021. The new AI will likely identify barriers to fair housing that are also barriers to affordable housing. Once the AI is finalized, the City may select different or additional actions to take than the ones listed below.

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

Some identified strategies to overcome barriers to affordable housing are:

- Provide financial assistance to renters and owners in the form of TBRA, down payment and closing cost assistance and/or security deposit assistance.
- Invest CDBG and HOME funds in the development of affordable housing.
- Revise zoning regulations to improve the ability of developers to build missing middle housing (duplexes, triplexes, fourplexes, cottages units)
- Take an active role as allowed by City Administration in the framing of new building and zoning codes
- Provide fair housing education and outreach to landlords, management companies, renters, lenders, potential homebuyers, real estate agents and others in the real estate industry as well as provide legal assistance to move housing through probate.

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

Introduction

The following section describes other actions to be taken to meet the needs of the community.

Actions planned to address obstacles to meeting underserved needs

The primary obstacle to meeting underserved needs is the limited funding resources available to address identified priorities. In addition, the gap in what households can afford to pay for housing and the price of housing is another obstacle to meeting the needs of the underserved. The City has a lack of decent, affordable units to meet the needs of the community.

The effect of greater community needs in the form of homelessness, risk of homelessness, the increased demand for supportive services (particularly for persons with multi-system contact), the rising cost of housing, stagnant wages, and an aging housing stock in need of revitalization puts added pressures on the systems within the City.

The City of Pueblo will continue to partner with other public agencies and non-profit organizations, when feasible, to leverage resources and maximize outcomes in housing and community development. Using CDBG and CDBG-CV funds, the City will work with local service providers during the upcoming year to help prevent homelessness by providing rent assistance and utility assistance to very low income households. In addition, the City will provide housing counseling and case management services.

Lastly, the City and the County both contribute approximately \$500,000 annually toward funding various public services. While the need remains greater than the available resources, the approximately \$1M assists numerous agencies working to meet the needs of the most vulnerable residents.

Actions planned to foster and maintain affordable housing

The City will utilize its CDBG funds to continue several housing rehabilitation programs including programs for seniors and persons needing accessibility modifications to age in place. These housing rehab programs work to maintain the quality of the affordable housing stock occupied by low- and moderate-income households. Additionally, the City will utilize HOME funds toward the new construction of rental units in the Fuel and Iron development.

Actions planned to reduce lead-based paint hazards

The Pueblo County Department of Public Health and Environment operates a lead blood testing program for residents. The lead program offers the following service to residents of the County:

- Lead risk and hazard reduction education to resident owners, property managers, and tenants.
- Lead risk and hazard reduction education for occupational and hobby exposures.
- Environmental testing program for Lead hazard screening (cost: \$42.00/hour or no cost to those located within the Superfund Study Area).
- Blood Lead screening for children up to age 16, women of child-bearing age, pregnant or nursing women; and
- Blood Lead monitoring program for children with blood levels at or above 5.0 µg/dL.

The County also provides additional information regarding the common sources of lead exposure, potential health effects and methods to reduce exposure.

The City will continue to work with the Health Department as needed to reduce lead-based paint hazards and will continue to comply with all regulatory requirements of the CDBG and HOME programs as related to lead-based paint.

Actions planned to reduce the number of poverty-level families

Ongoing efforts to strengthen economic development and provide the City's lowest-income households with needed housing-related assistance and services directly address needs identified in this plan. The City will work with existing agencies that serve persons in poverty in order to evaluate their needs, coordinate the delivery of services, and determine if funding assistance should be made available through the CDBG Program in cases where there are insufficient resources to meet the identified needs. In addition, the City will:

- continue to work to coordinate community development strategies, needs assessments and integrated planning.
- continue to work within the Continuum of Care process and other coordinating agencies to reduce duplication, improve integration, and identify unmet service needs.
- expand coordination among local funding entities to streamline the application process, and to maximize the impact of those resources.
- provide letters of support and other documentation to agencies in support of their fundraising efforts.
- enhance public access to information about community services.

Actions planned to develop institutional structure

The City of Pueblo is committed to the continued coordination of all Anti-Poverty and Community Development initiatives. The City has entered into several intergovernmental agreements with other entities such as Pueblo County to administer the CSAC process, which allocates general revenue funds from both entities to non-profit agencies and economic development organizations that enhance the quality of life in the community. The City is also working to reduce silos through groups such as the Pueblo Community Commission on Housing and Homelessness, which is a group of over 40 individuals from across government, housing and services that meet regularly to discuss issues and problem solve.

Another local group is the Pueblo Business Economic Recovery Team (BERT) is a collaboration between local government, chambers of commerce, and economic development focused agencies who have all come together to develop resources, support messaging, and positively impact local businesses during the COVID-19 pandemic. Various BERT sub-committees are connecting businesses that need different types of assistance with individuals and organizations that can help. Types of assistance include financial, marketing and management consulting.

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

Meaningful collaboration as it relates to the development and implementation of housing and community development programs and services has become increasingly important as the federal resources available to these programs continue to decline. Collaboration with housing and service providers helps the City to capture the maximum benefit for each dollar it invests and ensures that investments strategically address both short-term needs and advance long-term goals.

The Department of Housing and Citizen Services conducts ongoing consultation with human services agencies, housing development organizations, and municipalities at various points in time during a program year.

Program Specific Requirements

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

Introduction:

The following section describes program-specific requirements for the CDBG and HOME programs.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	88% (one year, FY 2021)

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(l)(2)

1. *A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:*

The City has available \$438,476.42 in program income that has been allocated in the FY2021 projects. The County does not anticipate receiving any additional program income for its HOME programs during FY 2021 or any other forms of investment.

2. *A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:*

When HOME Program funds are used to assist a household in the purchase of a unit, restrictions will be placed on the unit to ensure compliance with the resale and recapture requirements described in 24 CFR 92.254(a)(5), as amended through July 2013. This section sets forth the method that will be used by the Consortium to enforce these requirements.

The HOME Down Payment Assistance Program will require a default. In the event of a default, as defined under the note and deed, and where net proceeds are sufficient to repay both the City's HOME investment and the homeowner investment, a full repayment of the HOME investment will be required.

3. *A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:*

Funding provided to developers of affordable rental housing will also be recaptured unless all of the following circumstances are demonstrated to exist: (i) more than 15 to 20 years have elapsed since the substantial completion of the project, or the City approves transfer of the Project and waives acceleration of the indebtedness, which transfer may be approved or disapproved in the sole discretion of the City, (ii) the primary lender also consents to assumption of the mortgage or obligation to which the deed of trust securing the agreement is subordinate, (iii) the sale of the Property is to a subsequent purchaser who agrees in writing to comply with the affordability requirements set forth at 24 CFR, §92.252, (iv).

All subrecipient, developers, owner and sponsor HOME agreements contain clauses stating project lease-up requirements. The City has amended the written guidelines to address changes promulgated by the 2013 New HOME Rule. All new for-sale single-family projects will have provisions within the written agreement calling out the new HOME Investment Partnership Act requirement that all units not sold within 9 months of completion will be

converted to rental.

4. *Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:*

The Consortium does not permit the use of HOME funds to refinance existing debt secured by multifamily or single-family housing that is being rehabilitated with HOME funds.