

HOME-ARP Allocation Plan Template with Guidance

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

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

Template:

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

The City of Greeley became active and engaged with the community around the growing population of persons experiencing homelessness and possible solutions during the first quarter of 2022. The reason for this significant shift by the City of Greeley, is because there is new leadership at the City including the City Manager, Deputy City Manager, and Assistant City Manager. The Assistant City Manager’s priorities are homelessness, housing, and neighborhood engagement. The Assistant City Manager was selected for specific expertise in the areas of Homelessness and Housing. She has over 15 years of both direct service and leadership. She worked for and continues to consult with Dr. Sam Tsemberis who is the creator of the evidenced based practice of Housing First.

Prior to the Assistant City Manager’s arrival, the city engaged Urbanity Advisors to provide the City of Greeley with research on best practices and models for people experiencing homelessness and to develop more affordable housing. Urbanity Advisors was also tasked with conducting multiple focus groups with a wide range of community partners. The partners and the dates of these community listening sessions are listed below. There were several questions posed during these meetings, including what the attendees’ preferences were in regard to the City of Greeley’s resources such as HOME, CDBG, and the General Fund of the City of Greeley’s budget. All the focus groups and listening sessions included people with lived experiences of homelessness and housing insecurity. Urbanity Advisors led three neighborhood meetings, conducted three surveys, and requested comments on Speak Up Greeley, (a social media engagement tool in which all posts from the City of Greeley are in English and Spanish). Neighborhood meetings were offered in person at the Greeley Recreation Center (in the heart of a low- moderate-income neighborhood) and via Zoom; surveys were done online. See table below for numbers of participants.

As noted, Urbanity Advisors was engaged to provide the City of Greeley with research information related to best practices on homelessness and affordable housing and conducted multiple focus groups with a wide range of community partners.

Urbanity Advisors led three neighborhood meetings, conducted three surveys, requested comments on Speak Up Greeley, (a social media engagement tool, all posts from the City of Greeley are always in English and Spanish). Neighborhood meetings were offered in person at the Greeley Recreation Center (in the heart of a low- moderate-income neighborhood)) and via Zoom; surveys were done online. See table below for numbers of participants, the different organizations, and dates of consultation.

List the organizations consulted:

Urbanity Advisors Community Outreach Summary

Date & Time	Location	Public Participants
Session One		
February 16, 2022	Zoom	68
February 17, 2022	Greeley Recreation Center	39
Survey 1	Online	72
Session Two		
April 13, 2022	Zoom	43
April 14, 2022	Greeley Recreation Center	36
Survey 2	Online	32
Session Three		
May 18, 2022	Greeley Recreation Center	22
May 19, 2022	Zoom	16
Survey 3	Online	97
Date & Time	Location	Participants
Session Three		
May 18, 2022	Greeley Recreation Center	22
May 19, 2022	Zoom	16
Survey 3	Online	97

Note: Please see attachment A with justification on how some of these agencies meet the Civil Rights consultation requirements.

Agency/Organization	Org Type	Method of Consultation
Northern Colorado Continuum of Care	Continuum of Care	In-person meetings
City of Evans, Economic Development	Local Government	In-person meetings
Mosaic Church	Faith-based	In-person meetings
City of Greeley, Chief Resiliency Officer	Local Government	In-person meetings
Poudre Trail	Local Government	In-person meetings
City of Greeley, Community Development	Local Government	In-person meetings
City of Greeley, Economic Health & Housing	Local Government	In-person meetings
Catholic Charities	Non-profit agency- Transitional Housing Provider/ Homeless Service Provider – Qualifying Population; Civil Rights	In-person meetings
Otis & Bedingfield	Legal- works with people and families who are vulnerable/dealing with disabilities and needing assistance in the areas of housing and real estate/ Fair Housing; Civil Rights	In-person meetings
City of Greeley, Greeley Urban Renewal Authority	Local Government; Civil Rights	In-person meetings
Weld County Department of Human Services	County Government/ homeless/ At risk of Homelessness/ Domestic Violence – three Qualifying Populations; Civil Rights	In-person meetings
Colorado Department of Corrections	County Government; Civil Rights	In-person meetings
United Way of Weld County	Non-profit agency-multiple focuses/ homeless services- Qualifying Population; Civil Rights	In-person meetings
Weld Trust	Non-profit agency (funder)	In-person meetings
Greeley Fire Department	Local Government	In-person meetings
City of Evans, City Manager	Local Government	In-person meetings

High Plains Housing Development Corporation	Non-profit housing developer; Civil Rights	In-person meetings
North Range Behavioral Health	Non-profit agency-mental health; Civil Rights	In-person meetings
High Plains Library District	Library	In-person meetings
Sunrise Community Health	Non-profit agency-health provider; Civil Rights	In-person meetings
North Colorado Health Alliance	Non-profit agency-health provider; Civil Rights	In-person meetings
City of Greeley, City Manager	Local government	In-person meetings
Greeley/Weld County Housing Authorities	Housing authority/ address fair housing concerns/ priorities people with disabilities – Qualifying Population	In-person meetings
Dayspring Christian Academy	Education	In-person meetings
North Colorado Medical Foundation	Non-profit agency-funder	In-person meetings
Greeley Family House	Non-profit agency-shelter and services-families; Civil Rights	In-person meetings
Jobs of Hope	Non-profit agency-reentry housing and services- for men that are homeless and recently released from jail or prison; Civil Rights	Discussions through Northern Colorado Continuum of Care
Volunteers of America	Non-profit agency- Veterans services – Qualifying Population	Discussions through Northern Colorado Continuum of Care
Greeley-Weld Habitat for Humanity	Non-profit agency-developer of housing for LMI households/ They have also worked with several families that they prioritized because they were fleeing Domestic Violence. They also support many people who are at risk of homelessness. – Qualifying Populations	In-person meetings
Additional Consultations since the arrival of the Assistant City Manager- Juliana Kitten MSW - Sept 2022-Jan 15th 2023		
Sargent Matt Patella of Greeley's Police Dept Neighborhood Action Team	Leads the team that has the most interaction with people experiencing homelessness. He was also consulted for his knowledge of sex trafficking activities in Greeley and the surrounding Area – provide information and comment on two Qualifying Populations – People	In person with City Leadership

	<p>experiencing homelessness and people who are fleeing/ sex trafficking / As well as how sex trafficking rings have practiced based on who they target and where it happens most frequently.</p> <p>Civil Rights</p>	
The Avery Center	<p>Not for profit – focused on ending Sex Trafficking. – Serves a Qualifying Population; Civil Rights</p>	<p>Assistant City Manager reached out to the Executive Director of the Avery Center via LinkedIn, Megan Lundstrom. Megan Lundstrom responded that she recently left the Avery Center to work with TAC – a national consulting firm. She provided the Interim Executive Directors email. I am still working to set up a meeting with Daniel Eastman. The Interim CEO. Additional note: The Avery Center was consulted. See Needs Assessment and Gap Analysis</p>
City Attorney's office	Local Government	<p>Assistant City Manager had two meetings with two different City Attorney's and discussed several topics related to housing and homelessness, civil rights related to places people can be, right of people with disabilities specifically related to housing as well as some potential initiatives such as a diversion court for people experiencing homelessness</p>
People currently experiencing homelessness	Literally Homeless - QP	<p>Assistant City Manager met with people experiencing homelessness, this was done at the Housing Navigation Center as well during three separate outreach visits to encampments to specifically ask the people at those homeless encampments what they thought the greatest need in our community was. The overwhelming majority said their own housing and that there was also a need for more substance use services</p>
A Woman's Place	<p>Greeley's only shelter specifically for people experiencing Domestic Violence- (Qualifying Population); Civil Rights</p>	<p>They are an active member in the Continuum of Care. Also, Ms. Kitten met with their Executive Director to learn more about their services and specific gaps they see for their population. There were two major areas identified</p> <ol style="list-style-type: none"> 1. There are not enough shelter options for people experiencing domestic violence

		2. Need for more rental subsidies and affordable housing units
The Veterans Resource Center	Qualifying Population- Veterans	<p>The Veterans Resource Center feedback via email. The following is what they noted as current needs for the Veteran population:</p> <p>Everything associated with housing is a need: finding suitable housing; assistance with rent and/or mortgage; utility assistance; help with deposits, application fees, 1st month's rent.</p> <p>He said pretty much everyone they talk to has some kind of a need associated with housing/shelter.</p> <ul style="list-style-type: none"> • Many of the Veterans he sees absolutely will not go to the Cold Weather Shelter. They suffer from PTSD and mental issues and “cannot” sleep that closely to someone. • VASH vouchers – waiting list. He’s had one Veteran waiting for 6+ months. • A number don’t qualify for VASH vouchers, as they did not receive an honorable discharge. • Services – they don’t qualify for services if they weren’t honorably discharged (mental health, addiction, etc. from VA). Cost is definitely prohibitive. • Transportation is hard. The closest VA is in Loveland and the bus only runs there a couple of times a day, one of which runs real early (he thought) and then they have a walk to get from the bus stop to the VA office. • Of the people he saw last year, about 40% were homeless. The others were fearful of losing the housing they had (no money for rent/mortgage/utilities). <p>A good deal of the Veterans won’t access Guadalupe due to having to be sober</p>

ARC of Weld County	Not for profit – focused on persons with physical & intellectual disabilities; Civil Rights	In-person meetings
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Summarize feedback received and results of upfront consultation with these entities:

The initial round of consultations conducted by Urbanity Advisors included the following summary and suggestions:

1. There is a lack of coordination and leadership among the current not for profits, Weld County Department of Human Services, and the City of Greeley
2. The City of Greeley needs to in the short-term to coordinate and provide leadership to the various stakeholders, to ensure everyone has the same understanding of current resources, and the largest gaps in the community's existing homeless services infrastructure. This task force lead by the city will focus the current efforts and resources to maximize all possible resources for the most vulnerable
3. Conduct a Housing Needs Assessment
4. Prior to deciding on a campus model for people experiencing homelessness, the community needs to have much more in-depth research about this model, the successes, and potential failure points
5. Establish a user-friendly resource guide for organizations, housed and unhoused citizens
6. The only emergency shelter only operates during the winter. This is a huge gap and there is a need to look at creative temporary solutions

At the beginning of 2023, another survey was sent to all the agencies and organizations listed above and was also publicized on the Speak Up Greeley engagement page. The Survey was in both English and Spanish. It was very simple. It described the qualifying populations as well eligible activities, and they were asked to rate each activity from 1-4 with 4 being the most important. We received between all platforms over 125 responses. The community members and providers selected two areas that they felt were the most important:

1. A 365 year-round emergency night and day shelter
2. More affordable housing

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

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

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

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

Template:

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

- ***Date(s) of public notice:*** 1/29/2023 (for public comment and 1st public hearing), 2/19/23 (for 2nd public hearing)
- ***Public comment period:*** start date – 2/09/2023 end date - 2/25/2023
- ***Date(s) of public hearing:*** Two public hearings held – 2/8/2023 and 3/7/2023

Describe the public participation process:

Posted notice of the 15-day comment period, public meeting, and public hearing were in the local newspaper, the Greeley Tribune, in both English and Spanish. The same were provided through email newsletters, on the Greeley Urban Renewal Authority and Housing and Homeless Services websites, and via social media outlets. A digital copy of the allocation plan was available for review and comment on the same websites and was provided to the agencies of the City's CDBG partner group; physical copies were posted at the four local libraries.



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Describe efforts to broaden public participation:

1. Hired a consultant to conduct public meetings, surveys, etc. The meetings were held both virtually and at a location in a low- moderate, downtown location. Surveys were available online.
2. Provided information and the ability to comment on the website Speak Up Greeley.
3. Provided the allocation plan in a variety of ways, including digitally and in hard copy.
4. Utilized the four local libraries as a means to provide the Allocation Plan to the public.
5. Utilized social media to the extent practicable.
6. Held an extra public hearing (additional to the one required).
7. Shared the Allocation with the City's CDBG partner group through email notifications.
8. Shared the Allocation Plan with the attendees at the Urbanity Advisers meetings.

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

Pending

Summarize any comments or recommendations not accepted and state the reasons why:

Pending

Needs Assessment and Gaps Analysis

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

Template:

This allocation plan is specific to the City of Greeley, however much of the data available is for all of Weld County (the Greeley Metropolitan Statistical Area), and in some cases, both Weld and Larimer Counties (which is the region for the Northern Colorado Continuum of Care). Because people experiencing homelessness can be quite transient, information for any of the “boundaries” noted are applicable to the issues. City leadership believes the current numbers to be higher than those shown for Greeley in the table below. Fort Collins is the largest of the cities noted, followed by Greeley, then Loveland.

Sheltered and Unsheltered Homelessness – 2022 Point-in-Time Count

Location	Sheltered		Unsheltered		Total
Greeley	153	65%	83	35%	236
Loveland	70	37.5%	116	62.5%	186
Fort Collins	284	77%	84	23%	368
Other	2	100%	0	0%	2

Current Housing Inventory – 2022 Point-in-Time Count

All noted agencies below are in Greeley.

Agency	Type	Special Populations	Year-Round Beds	Seasonal Beds	Over-flow	Total Beds	PIT Count	Utilization Rate
A Woman's Place	Emergency Shelter	DV	11			11	6	55%
Catholic Charities	Transitional Housing		43			43	27	63%
Greeley Family House	Transitional Housing	Families	22			22	22	100%
United Way of Weld County	Cold weather emergency shelter	Low Barrier – accepts anyone who asks for shelter,	0	62		62	55	89%

		will provide motel rooms for families with children						
Catholic Charities	PSH	Families	71			71	71	100%
North Range Behavioral Health	PSH 1	Supports people with a range of mental health. Trauma and issues related to substance misuse	6			6	6	100%
North Range Behavioral Health	PSH 2	Supports people with a range of mental health. Trauma and issues related to substance misuse	1			1	1	100%
North Range Behavioral Health	PSH 3	Supports people with a range of mental health. Trauma and issues related to substance misuse	19			19	13	68%
Greeley Family House	Transitional Housing	Families	25			25	25	100%
Jobs of Hope, Inc.	Transitional Housing	Exiting correctional system	12			12	6	50%
North Range Behavioral Health	Transitional Housing	Supports people with a range of mental health.	12			12	8	67%

		Trauma and issues related to substance misuse						
Current Gap	<p>Based on the 2022 Point in Time Count and the available beds and types of beds/housing. It is clear that there is not enough of any resource emergency shelter, permanent supportive housing, domestic violence shelter beds etc.</p> <p>The only emergency shelter operates from November to April. The rest of the year we have ZERO emergency shelter beds. Based on the most recent Point in Time count – which is typically an under-count - <i>Greeley has 236 people experiencing homelessness. Of those 236 people only 62 people will be able to access emergency shelter and only during the months of Nov-April. At this point, since emergency shelter is for basic survival- this appears to be the most acute gap.</i></p>							

The Weld County Health Department just completed their latest Community Health Survey the following are excerpts from their initial analysis related to Housing.

Sixteen percent of Greeley residents reported having an unstable housing situation, higher than the countywide rate of 9.5%.	<p>1 in 5 Greeley residents (20%) said that more than one family lived in their home at the time the survey was administered. This could be for temporary or permanent reasons. Countywide, the rate of double-up households was 15%.</p> <p>In 2019, 9.5% of Greeley residents said more than one family lived in their home.</p>
In 2019, 13.5% of Greeley residents reported unstable housing.	<p>More than a third (36%) of Greeley residents reported being housing cost burdened (spending more than 30% on rent/mortgage and utilities). Countywide, 33% reported being housing cost burdened.</p>

The American Community Survey from the U. S. Census Bureau shows a Greeley population estimate of 109,323 on July 1, 2022.

State of Colorado Statewide Apartment Survey for 1st Quarter 2022 for Greeley Metro Area.

Vacancy rate	4.1%
Average rent	\$1,356
Median rent	\$1,350
Inventory (number of properties surveyed)	5,314
Number of properties surveyed	36

Vacant	220
Average rent – studio	\$974
Average rent – 1 BR	\$1,237
Average rent – 2 BR, 1 BA	\$1,195
Average rent – 2 BR, 2 BA	\$1,558
Average rent – 3 BR, 2 BA	\$1,787
Average rent – “Other”	\$1,222
5+ unit properties per Census (2020 5-Year American Community Survey)	8,833
LIHTC units per CHFA	1,567
Estimated market rate units	7,266
2+ unit properties per Census (2020 5-Year American Community Survey)	13,104

The following table is from Greeley’s Strategic Housing Plan:

Housing mix	63.56% SF; 36.44% MF
Greeley’s MF units not constructed – “short”	401

The following information is from U.S. Census (2021 ACS 1-year estimates):

Occupied renter-occupied units	14,604
# With household income <\$25,000	5,041

Assistant City Manager Juliana Kitten recently met and consulted with the **Weld County Apartment Association**. They reported a higher vacancy rate than what is listed above. Many of the representatives discussed their desire to work with people who have a voucher or other rental subsidy and/or people experiencing homelessness, but their concern was that historically a case manager will move someone in and then they rarely see that case-manager again, and when they try to reach out, the response of the social service agency is limited and they end up with many people facing eviction because they need more help than what the landlord or property manager can provide. The major theme was they would like to help and partner, but they need the social service agencies to provide more support to their tenant and be more responsive to landlords and property managers.

Based on the above information- the information received during consultation and recent surveys by the Weld County Health Department, over one third of our residents report spending more than 30% of their income on rent, and they are worried about this housing burden. More than 20% of our residents are living doubled up. The need in Greeley like the rest of the country for affordable housing is building and without dramatic action it has and will continue to grow.

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

Homeless as defined in 24 CFR 91.5

1. Homeless

From 2022 PIT Report for Weld County (Total – 236) and U. S. Census Data

Program Type	Number of People	Percent of People
Emergency shelter	114	48.31%
Transitional Housing	39	16.53%
Unsheltered	83	35.17%
Gender	Number of People	Percent of People
Male	145	61.44%
Female	90	38.14%
Gender non-conforming	0	0%
Transgender	1	.42%

The City of Greeley has a total number of 236 people experiencing homelessness. Of that number we know that 62 meet the definition for chronic homelessness. Based on the point in time count. We know that in the City of Greeley during the 2022 point in time count, 82 people were unsheltered. Our emergency shelter was 89% full, so if any of the 83 people wanted emergency shelter only 10 would have a bed available to them.

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

There are many populations that need services and are great risk. Currently there are no shelters other than the domestic violence shelter that can accommodate someone who is in wheelchair. There is a supportive housing not-for profit apartment complex specifically for people who have suffered brain injuries, that has cut many of its services the last two years, and now they are asking people to find other places to live as they plan a remodel, starting in July 2023. There are very few apartments that will be designed for their needs. We have many different immigrant populations in Greeley. Many of them come to work at the local meat processing plants and in the agriculture industry. More outreach to these communities is needed. Our local university- University of Northern Colorado is starting this year, for the first time, a social services hub to assist their students who are homeless and the ones that are ‘couch-surfing’ and at great risk for homelessness.

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

As noted above, we have a congregate emergency shelter that operates six months a year and is inadequate for the number of people experiencing homelessness on a year-round basis. There are zero non-congregate emergency shelter options.

No agency is running a tenant-based rental assistance program with the exception of Weld County, which started one during the pandemic.

North Range Community Mental Health runs some permanent supportive housing units, but they also have made it very clear that this a bit of mission drift for them, and they want to get out of the property management business.

Currently the Greeley/Weld Housing Authority had not prioritized the needs of people who are homeless. Their top priorities are seniors and people who are at risk of homelessness. They also currently have over \$250,000 that could be used for rental subsidy but is not.

Describe the unmet housing and service needs of qualifying populations:

As noted above the City of Greeley has just hired Development Strategies to perform a Housing Market Analysis. One of the main objectives of this study is to provide a road map about the number and type of housing units that are needed and for each income level. An area that certainly needs attention is more programs to prevent homelessness. Weld County is providing emergency rental assistance, but often people are at the place of days or weeks at most away from eviction, which is very traumatizing and disruptive, if there was more in reach and coordination between the various departments at Weld County DHS and the City of Greeley's Service providers. This is true for people who are coping with Domestic Violence, Homelessness, and being at Risk of Homelessness. In addition, our Veterans, and their services, are a bit more isolated from other services. Also, the closest VA hospital and housing program, is an hour away in Cheyenne, Wyoming. There is a local agency that operates an SSVF program, and they are doing everything they can, but they are under-resourced and because of this have a difficult time helping their clients, to quickly find housing.

Another area of service that affects all of the qualifying populations is our transit system. There is no service on Sunday's, the buses stop running at 8:00pm and the only emergency shelter is located on the very eastern boarder of the city limits, so often transportation, is needed for someone to access it.

Homeless as defined in 24 CFR 91.5

The City of Greeley has a total number of 236 people experiencing homelessness. Of that number, we know that 62 meet the definition for chronic homelessness. Based on the point in time count. We know that in the City of Greeley during the 2022 point in time count. 82 people were unsheltered. Our emergency shelter was 89% full, so if any of the 83 people wanted emergency shelter only 10 would have a bed available to them.

There are very few resources for intensive on-going case-management once a person has been housed.

There is only one person in the community who provides outreach services and that is only one day a week.

The care for people experiencing homelessness is falling to our police and fire departments.

At Risk of Homelessness as defined in 24 CFR 91.5

Currently there is not a strong data set that identifies this. Since the pandemic, the county has run the Emergency Rental Assistance Program and is adding another several millions of dollars to that this year. We have a goal of stronger coordination with all our partners. But as previously noted, there are many hundreds of residents in Greeley that are rent-burdened, doubled-up and are essentially one paycheck or medical illness away from becoming homeless.

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

According to the consultation with our domestic violence providers, there is a very large hidden need beyond what the point in time count demonstrated for people who are experiencing domestic violence. Their most recent statistics show the following for just their shelter.

In 2022:

- 844 crisis calls
- 385 victims served
- 459 clients received job-searching support for long-term self-sufficiency
- 907 legal advocacy services provided

During my consultation with Sargent Patella, Greeley Police Department, about people who are fleeing Sex Trafficking situations, he noted that most of the victims were young women, who were homeless when they were targeted. He discussed how many of the lower cost hotels are where the majority of these issues take place in Greeley and that there is an area they are targeting. He also noted that they do not have enough focus and dedicated officers addressing this issue. He certainly believes it is a larger issue that needs more discussion and attention.

June 2, 2023 additional response:

Domestic Violence

There is one shelter for people experiencing domestic violence in Greeley, CO. In 2022, they served 385 individuals and had to turn away 136 people who qualified for their shelter due to a lack available space.

In terms of scope of the issue: From January 2021 to March 2023, there were 1,722 domestic violence cases. Additionally, Weld County felony (very violent, use of deadly weapon, serious bodily injury, strangulation) case numbers from January 2021 to March 2023 were 650. During the time frame noted there were 2,372 cases, which equals three cases per day.

Human Trafficking

In northern Colorado, including Fort Collins and Greeley, it's estimated 10,000 men regularly contribute to commercial sexual exploitation. Regional estimates on victims come up with more than 18,000 victims of sex trafficking advertised online in 2019, including at illicit massage parlors.

The data comes from the Avery Center for Research & Services, a Greeley-based firm dedicated to assisting at-risk individuals who are currently experiencing or previously experienced commercial sexual exploitation. The center partners with organizations and law enforcement agencies in northern Colorado to collect its statistics.

The center estimated 272 individuals were trafficked in Greeley in 2019, and there were more than 3,000 buyers of those individuals, 90% of whom were men.

Using the numbers from the National Institute of Justice that link five victims to every trafficker, Greeley has an estimated 54 traffickers.

If this HOME-ARP Allocation plan is accepted and we are able to open the shelter, we would train all staff to identify and know the signs of a person who maybe experiencing human trafficking and would support them to connect with the best resources available.

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

See above under current resources for explanation of gaps.

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

N/A

Identify priority needs for qualifying populations:

Basic emergency day and night shelter that operates 365 days a year.

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

The plan is based on the 2022 point in time count, the major themes from all surveys and interviews, and then selecting the need that seems most acute at this time. The most acute needs is that lack of a 24/hr, 365 days a year emergency day and night shelter. Also, the emergency shelter beds during winter are inadequate. There is clear support for this across all sectors of our community. Finally, Greeley has such limited services at every level for people experiencing homelessness, we could have picked any activity, but we choose this based on the data and the community’s voice, as well as the fact that an emergency shelter can save people’s live and without doing this, people experiencing homelessness lives are at greater risk without this.

June 2, 2023 additional response:

Based on all the data and information collected to date, there is an incredible need for shelter and housing in Greeley, CO. Information from the homeless information data base reviewed recently indicated there are 468 people who are homeless in Greeley and 82% are unsheltered. The Cold Weather Shelter at the Housing Navigation Center was at capacity nearly every night from November through April with multiple people being put up in a motel on a nightly basis.

HOME-ARP Activities

Template:

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

There will be a scoring template created based on best practices in development of non-congregate shelters. The rating committee will be made up of subject-matter experts, people with lived experience of homelessness and members of the qualifying populations.

Describe whether the PJ will administer eligible activities directly:

At this point, the plan is not to provide any of the services or development directly.

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

N/A

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

Template:

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ #		
Acquisition and Development of Non-Congregate Shelters	\$ 1,259,235		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ #		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 222,218	# %	15%
Total HOME ARP Allocation	\$ 1,481,453		

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

This investment will be a portion of the fund required for the non-congregate year-round 24-hour day and night emergency shelter. The goal will be to work with DOLA's division of Supportive Housing, utilizing their recently released transformational grants as another funding source. We

will also be working with both local private public supporters to complete the financing for the shelter and the necessary supportive services it will require.

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

The fact that there are grossly inadequate emergency shelter beds during winter and zero available during the rest of the year, is the driving data informing this plan. Also, there is support for this across all sectors of our community. Finally, Greeley has such limited services at every level for people experiencing homelessness, we could have picked any activity, but we choose this based on the data and the community's voice, as well as the fact that an emergency shelter can save people's lives and absent doing this, the lives of people experiencing homelessness will be at greater risk.

HOME-ARP Production Housing Goals

Template

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

0

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

0

Preferences

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

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

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

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

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

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

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

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

Template:

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

No preference

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

No Preference

Referral Methods

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

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

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

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

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

Template:

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

We will ensure that the eventual non-congregate 365 days a year emergency night and day shelter that is built -will accept all referrals in addition to most of the referrals which are expected to be self-referrals, of people walking in.

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

N/A

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

N/A

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

N/A

Limitations in a HOME-ARP rental housing or NCS project

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

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However,

no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Template

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

No limitation

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

No limitation

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

No limitation

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

The City does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, and thus has responded "N/A" to all requirements below.

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***
N/A
- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

N/A

- *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*

N/A

- *Specify the required compliance period, whether it is the minimum 15 years or longer.*

NA

- *State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*

NA

- *Other requirements in the PJ's guidelines, if applicable:*

N/A

ATTACHMENT A - Comments on Allocation Plan

Comments below were received during the public comment period. Responses to the comments from the City are also noted and have been provided to the person commenting.

1. Weld County Department of Human Services is committed to increase coordination efforts.
City Response: The City is very grateful for partnerships with other agencies and governments as issues of homelessness are discussed and solutions sought. Continued coordination with all agencies is the goal.
2. May add value to describe what is considered “sheltered” (with respects to the table on page 9).
City Response: The City agrees a definition of sheltered would be a good addition and has added one to the Needs Assessment and Gaps Analysis section of the Allocation Plan.
3. Greeley Family House is listed twice in the Current Housing Inventory-2022 Point-in-Time Count table and has different “year-round bed” numbers.
City Response: Staff contacted Greeley Family House to verify the correct number of year-round beds, made the correction to the Allocation Plan, and removed one of the listings for this agency.
4. Prior to Emergency Rent Assistance (ERA) which was established in response to the pandemic, WCDHS has provided tenant-based rental assistance (TBRA) via CSBG for over 10 years.
City Response: A sentence was added to the Allocation Plan noting the use of CSBG funds for TBRA.
5. Considering including the Courts as well as some of the larger property management companies in this conversation to assess the possibility of coordinating eviction prevention.
City Response: This is a good suggestion. The City will take this into consideration as programs to assist people at risk of homelessness are formulated.
6. Weld did not receive an additional several million, Weld received under one million to continue efforts (ERA).
City Response: The Allocation Plan has been corrected from the ERA adding several million dollars to continue efforts to the ERA receiving under one million.
7. (In the response to how the PJ determined the level of need and gaps in the PJ’s shelter and housing inventory and service delivery) Agreed, consider adding access to intensive mental/behavioral health and substance abuse addiction resources.

City Response: The need for these types of services for people experiencing homelessness is understood. The number of services available will depend on funding but be as inclusive as possible.

8. With regard to the section titled: *“Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing...”* Some information needs to be included regarding permanent supporting housing. For accuracy, there are some additional local resources that need to be added. A suggested additional paragraph, or change to the existing, is, *“Weld County has a small number of shelter programs including Greeley Family House, A Woman’s Place, Guadalupe, Almost Home, Jobs of Hope, and Hope at Miracle House but the needs are greater than the capacity of these programs. Additionally, three local non-profit agencies (A Woman’s Place, Greeley Family House, and Jobs of Hope) receive limited funding through the NoCO Continuum of Care to assist clients with permanent supportive rental housing.”*

City Response: A Woman’s Place should have been included in the discussion of emergency shelter, given they accept people the same day and there is no application or sobriety test required. The rest of the agencies listed in the comment are not places one can go to that night, and if there is room, can have a bed. All of the programs listed are great and the City is fortunate to have them. There is agreement that whether discussing emergency shelter, PSH, and/or transitional housing, there are not enough services to meet the needs in Greeley.

Follow-up from Commenter: The response from the City was appreciated and the commenter was in agreement with the City’s response.

9. As a local nonprofit affordable housing development organization, High Plains is supportive of the City of Greeley's efforts to address gaps in our homeless response services and infrastructure. Following are a few of my thoughts/follow-up questions as I reviewed the plan:

- As identified in the plan, we agree that there is a significant gap in emergency shelter services, and that the proposed 365-day emergency shelter would provide important life-saving services for this population.
- The plan does an excellent job of identifying the need and gaps in services the plan would address.
- I did not see information on the number of persons proposed to be served by the emergency shelter, nor did I see the costs/sources of funding for on-going operations. I assume that this would be addressed later and would come from other sources of funding.

City Response: HOME-ARP funding would be just one piece of the funding puzzle. The City will issue an RFP, and how many served, on-going costs of operations, etc., would be addressed by the applicant. The Cold Weather Shelter has been consistently seeing between 70 and 80 people every night (with a 60-person capacity). Community suggestions have included two low-barrier shelters

focused on different populations (one for adults and one for youth aging out of foster care). Since the proposed use of funds will be for low-barrier, non-congregate shelter, it may not make sense to build one very large shelter. Results from the 2023 Point-in-Time Count should show need when design, size, etc. are being considered.

- I would like to understand a little better how this project would integrate/coordinate with the operation of the existing Housing Navigation Center/Cold Weather Shelter recently funded and developed to provide seasonal cold-weather shelter in order to insure there is not a duplication of services.

City Response: The current Cold Weather Shelter's lease expires in three years, so perhaps when the lease is up, the non-congregate shelter may be completed and the current facility transitions or partially transitions to this low-barrier, non-congregate, emergency shelter. Again, the applicant (or co-applicant) would need to show collaboration with all the partnerships for the strongest application.

City Response: (Regarding duplication of services) Duplication of services doesn't apply in Greeley at this time, based on the data and assessment of the community needs and gaps. Greeley has some really great services, and some almost non-existent services, and significant demand/need is unmet 365/24/7. More than duplication of services, the concern is for collaboration and communication among service providers.

- Finally, as a developer of permanent housing solutions for our homeless population, I would encourage the City of Greeley to continue to study capital needs for projects that provide long-term housing solutions for our homeless populations as a next-steps approach to addressing our homeless housing needs once emergency needs are met.

City Response: There is agreement that housing is the solution and shelters just allow for management of the issue of homelessness. Right now, there are not enough dollars to focus only on housing. Not only would rental subsidies be needed (and there is always a large wait list in Greeley for Section 8 Vouchers), but there would be great cost associated with wrap around services also needed.



I fully support the City of Greeley's HOME-ARP Allocation Plan to determine an emergency shelter solution for current needs for persons experiencing homelessness.

City Response: The very thoughtful comments are greatly appreciated.

Comments below were received during the second public hearing. (Commenters were more concerned about other issues in the City and less about the contents of the Allocation Plan.)

1. The commenter expressed concern over a housing situation in Greeley and wanted some of the funds to be used to assist/build something for the tenants in that development.

City Response: The HOME-ARP funds will not be available for this type of assistance, and it is outside of the realm of the proposed use of funds.

- 
- 
2. The commenter expressed “fear of grants”. They provide funding, but when the grant funds are gone, the tax payers are left with the responsibility of continuing to provide the service/activity funded by the grants. Disliked the fact that the taxes paid by the commenter are often for things not utilized by the commenter (such as schools).

City Response: The City is aware on ongoing responsibilities associated with accepting the HOME-ARP grant, if approved by HUD, and will not implement an activity that is not sustainable through means other than just the City’s support.

ATTACHMENT B – Ads for Public Comment and Public Hearings

Notice of Public Comment and Both Public Hearings – English

Notice of Public Comment Period and Public Hearing for the HOME-ARP Allocation Plan

Public notice is given for the City of Greeley's intent to submit its federal HOME Investment Partnership Program-American Rescue Plan (HOME-ARP) Allocation Plan requesting \$1,481,453 from the U. S. Department of Housing and Urban Development (HUD) under the American Rescue Plan, implemented to address the aftermath of the COVID-19 pandemic. The Allocation Plan must address how the funds will be used to benefit "qualified populations", which are defined within the Allocation Plan.

The City is seeking comment on the required allocation plan. Listed below are multiple opportunities to provide comment on the HOME-ARP Allocation Plan for the City of Greeley. We encourage you to share the following information.

Public Comment Period

The HOME-ARP Allocation Plan will be made available starting on February 9, 2023, on the Greeley Urban Renewal Authority website, at the following link: <https://greeleygov.com/services/ehh/greeley-urban-renewal-authority>. Written comments can be submitted to Carol Larsen at carol.larsen@greeleygov.com or by mail to Greeley Urban Renewal Authority, Attn: Carol Larsen, 1100 10th Street, Suite 402, Greeley, CO 80631. Comments will be accepted through February 25, 2023.

Public Hearings

(Please see the meeting portal for the City of Greeley, <https://greeley-communications.com/> for information on how to access the City Council public hearing and for the meeting packet of information for both public hearings.)

Wednesday February 8, 2023, at 4:30 p.m. – The public hearing at the Greeley Urban Renewal Authority Board of Commissioners meeting will be held in person at the LINC Library, 501 8th Avenue, Greeley, CO. Ask for the GURA Board meeting at the reception desk.

Tuesday March 7, 2023 at 6:00 p.m. – The public hearing at the Greeley City Council meeting will be held both in person at Council Chambers, 1001 11th Avenue, and virtually via Zoom.

Questions about the public comment period or hearings? Contact J. C. Salas, GURA Manager, at j.c.salas@greeleygov.com. For technical support regarding Council's virtual public hearing participation, contact the Greeley City Clerk's office at cityclerk@greeleygov.com.

City buildings, Council Chambers, and the LINC library are accessible to persons in wheelchairs. Persons needing auxiliary aids and/or other assistance related to a disability to effectively review this document or attend the virtual GURA Board public hearing or City Council meeting may call the GURA office noted above for additional assistance. (Please allow 72 hours for requests to be processed.)

Published: Greeley Tribune January 29, 2023-1951113

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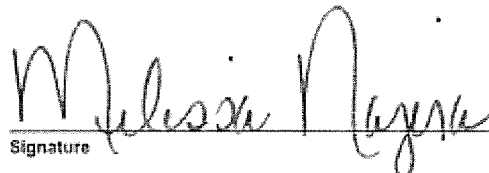
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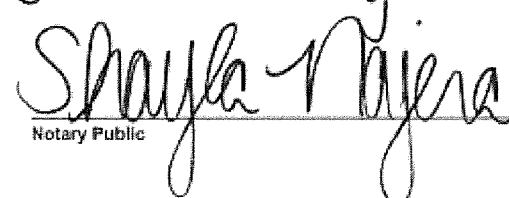
County of Weld
State of Colorado

The undersigned, Agent, being first duly sworn under oath, states and affirms as follows:

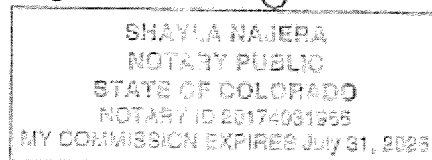
1. He/she is the legal Advertising Reviewer of Prairie Mountain Media LLC, publisher of the *Greeley Tribune*.
2. The *Greeley Tribune* is a newspaper of general circulation that has been published continuously and without interruption for at least fifty-two weeks in Weld County and meets the legal requisites for a legal newspaper under Colo. Rev. Stat. 24-70-103.
3. The notice that is attached hereto is a true copy, published in the *Greeley Tribune* in Weld County on the following date(s):

Jan 29, 2023


Signature

Subscribed and sworn to me before me this
30th day of January, 2023

Notary Public

(SEAL)



Account: 1100026
Ad Number: 1951113
Fee: \$51.04

Notice of Public Comment and Both Public Hearings – Spanish

Aviso de Período de Comentarios Públicos y Audiencia Pública para el Plan de asignación HOME-ARP

Se da aviso público de la intención de la Ciudad de Greeley de presentar su Plan de Asignación del Programa de Asociación de Inversión HOME federal-Plan de Rescate Americano (HOME-ARP) solicitando \$ 1,481,453 del Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos (HUD) bajo el Plan de Rescate Estadounidense, implementado para abordar las secuelas de la pandemia COVID-19. El Plan de Asignación debe abordar cómo se utilizarán los fondos para beneficiar a las "poblaciones calificadas", que se definen dentro del Plan de Asignación.

La Ciudad está buscando comentarios sobre el plan de asignación requerido. A continuación se enumeran múltiples oportunidades para proporcionar comentarios sobre el Plan de Asignación HOME-ARP para la Ciudad de Greeley. Le recomendamos que comparta la siguiente información.

Período de comentarios públicos

El Plan de Asignación HOME-ARP estará disponible a partir del 5 de febrero de 2023, en el sitio web de la Autoridad de Renovación Urbana de Greeley, en el siguiente enlace: <https://greeley.gov/services/ehh/greeley-urban-renewal-authority>. Los comentarios por escrito pueden enviarse a Carol Larsen en carol.larsen@greeleygov.com o por correo a Greeley Urban Renewal Authority, Attn: Carol Larsen, 1100 10th Street, Suite 402, Greeley, CO 80631. Se aceptarán comentarios hasta el 29 de febrero de 2023.

Audiencias públicas

(Consulte el portal de reuniones de la Ciudad de Greeley <https://greeley-co.municodemetings.com/> para obtener información sobre cómo acceder a la audiencia pública del Consejo Municipal y para el paquete de información de la reunión para ambas audiencias públicas).

Miércoles 8 de febrero de 2023, a las 4:30 p.m. - La audiencia pública en la reunión de la Junta de Comisionados de la Autoridad de Renovación Urbana de Greeley se llevará a cabo en persona en la Biblioteca LINC, 501 8th Avenue, Greeley, CO. Solicite la reunión de la Junta de GURA en el mostrador de recepción.

Martes 7 de marzo de 2023 a las 6:00 p.m. - La audiencia pública en la reunión del Consejo Municipal de Greeley se llevará a cabo en persona en las Cámaras del Consejo, 1001 11th Avenue, y virtualmente a través de Zoom.

¿Preguntas sobre el período de comentarios públicos o las audiencias? Póngase en contacto con J. R. Salas, gerente de GURA, en j.r.salas@greeleygov.com. Para obtener apoyo técnico con respecto a la participación en la audiencia pública virtual del Consejo, comuníquese con la oficina del Secretario de la Ciudad de Greeley en cityclerk@greeleygov.com.

Los edificios de la ciudad, las Cámaras del Consejo y la biblioteca LINC son accesibles para personas en sillas de ruedas. Las personas que necesiten ayudas auxiliares y/u otra asistencia relacionada con una discapacidad para revisar efectivamente este documento o asistir a la audiencia pública virtual de la Junta de GURA o a la reunión del Consejo Municipal pueden llamar a la oficina de GURA mencionada anteriormente para obtener asistencia adicional. (Por favor, permita 72 horas para que se procesen las solicitudes).

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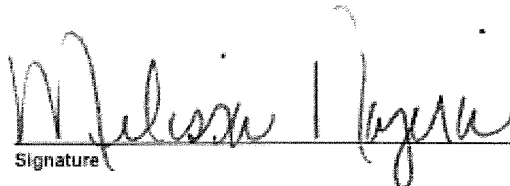
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County of Weld
State of Colorado

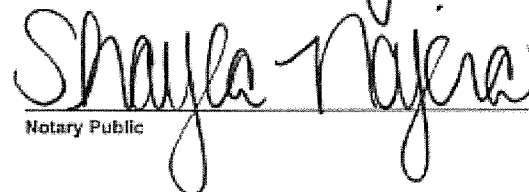
The undersigned, Agent, being first duly sworn under oath, states and affirms as follows:

1. He/she is the legal Advertising Reviewer of Prairie Mountain Media LLC, publisher of the *Greeley Tribune*.
2. The *Greeley Tribune* is a newspaper of general circulation that has been published continuously and without interruption for at least fifty-two weeks in Weld County and meets the legal requisites for a legal newspaper under Colo. Rev. Stat. 24-70-103.
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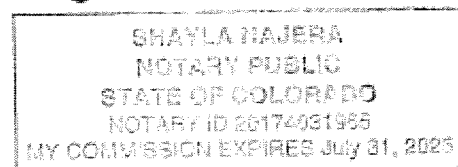
Jan 29, 2023


Signature

Subscribed and sworn to me before me this
30th day of January 2023.


Notary Public

(SEAL)



Account: 1100026
Ad Number: 1951114
Fee: \$59.64

Notice of 2nd Public Hearing – English

Notice of Public Comment Period and Public Hearing for the HOME-ARP Allocation Plan

Public notice is given for the City of Greeley's intent to submit its Federal HOME Investment Partnership Program-American Rescue Plan (HOME-ARP) Allocation Plan requesting \$3,481,453 from the U. S. Department of Housing and Urban Development (HUD) under the American Rescue Plan, implemented to address the aftermath of the COVID-19 pandemic and its effects on "qualifying populations" of persons experiencing homelessness.

The Allocation Plan proposes that the funds be used as part of a HUD funding package for the acquisition and/or development of a non-congregate shelter for homeless persons meeting a "qualified population" definition (definition in the Allocation Plan). The City is seeking comment on the Allocation Plan and its proposed use.

Listed below is the final opportunity to provide comment on the HOME-ARP Allocation Plan for the City of Greeley. We encourage you to share the following information.

Allocation Plan Availability

The HOME-ARP Allocation Plan is available on the City's website, at the following links: <https://greeleygov.com/services/ehh/greeley-urban-renewal-authority> and <https://greeleygov.com/government/cmo/special-programs/homeless-and-housing-services>. It can also be requested from the Greeley Urban Renewal Authority (1100 10th Street, Suite 402, Greeley, 870-330-3000) or by emailing juliana.kitten@greeleygov.com or carol.jarvis@greeleygov.com. The Allocation Plan can be provided in languages other than English by request through one of the email addresses or phone number noted. Please allow 72 hours for processing requests.

Public Hearing

(Please use the meeting portal for the City of Greeley, <https://greeley-cogmeetings.com/> for information on how to access the public hearing and for the meeting packet of information.)

Tuesday, March 7, 2023 at 6:00 p.m. – The public hearing at the Greeley City Council meeting will be held both in person and virtually. Council Chambers are located at 1801 11th Avenue and are accessible. If additional accommodations are needed, please call the City Clerk's office 72 hours in advance of the public hearing.

Questions about the HOME-ARP program or public hearing? Contact Juliana Kitten, Assistant City Manager, at 806-673-8407 or juliana.kitten@greeleygov.com. For technical support regarding virtual public hearing participation, contact the Greeley City Clerk's office at cityclerk@greeleygov.com

Published: Greeley Tribune February 19, 2023-1955830

Prairie Mountain Media, LLC


PUBLISHER'S AFFIDAVIT

County of Weld
State of Colorado

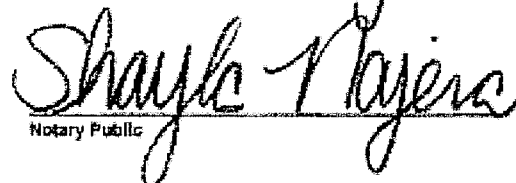
The undersigned, Agent, being first duly sworn under oath, states and affirms as follows:

1. He/she is the legal Advertising Reviewer of Prairie Mountain Media LLC, publisher of the Greeley Tribune.
2. The Greeley Tribune is a newspaper of general circulation that has been published continuously and without interruption for at least fifty-two weeks in Weld County and meets the legal requisites for a legal newspaper under Colo. Rev. Stat. 24-70-103.
3. The notice that is attached hereto is a true copy, published in the Greeley Tribune in Weld County on the following date(s):

Feb 19, 2023


Signature

Subscribed and sworn to me before me this
20th day of February 2023


Notary Public

(REAL)

SHAYLA NAJERA
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20174031965
MY COMMISSION EXPIRES July 31, 2025

Account: 1100028
Ad Number: 1955830
Fee: \$49.28

Notice of 2nd Public Hearing - Spanish

Aviso de Período de Comentarios Públicos y Audiencia Pública para el Plan de Asignación HOME-ARP

Se da aviso público de la intención de la Ciudad de Greeley de presentar su Plan de Asignación del Programa de Asociación de Inversión HOME Federal-Plan de Rescate Americano (HOME-ARP) solicitando \$ 1,481,453 del Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos (HUD) bajo el Plan de Rescate Estadounidense, implementado para abordar las secuelas de la pandemia COVID-19 y sus efectos en las "poblaciones calificadas" de personas sin hogar.

El Plan de Asignación propone que los fondos se utilicen como parte de un paquete de financiación (por determinar) para la adquisición y/o desarrollo de un refugio no congestionado para personas sin hogar que cumple con una definición de "población calificada" (definición en el Plan de Asignación). La Ciudad está buscando comentarios sobre el Plan de Asignación y su uso propuesto.

A continuación se presenta la última oportunidad de proporcionar comentarios sobre el Plan de Asignación HOME-ARP para la Ciudad de Greeley. Le recomendamos que comparta la siguiente información.

Información del plan de asignación
El Plan de Asignación HOME-ARP está disponible en el sitio web de la Ciudad, en los siguientes enlaces: <https://greeleygov.com/servicios/ent/greeley-urban-renewal-authority> y <https://greeleygov.com/government/cmo/special-programs/homeless-and-housing-services>. También se puede solicitar a la Autoridad de Renovación Urbana de Greeley (110010 th Street, Suite 402, Greeley, 870-350-3386) o enviando un correo electrónico a juliana.kitten@greeleygov.com o caroljensen@greeleygov.com. El Plan de Asignación se puede proporcionar en idiomas distintos del inglés mediante solicitud a través de una de las direcciones de correo electrónico o número de teléfono indicados. Espere 72 horas para procesar las solicitudes.

Audiencia pública
(Consulte el portal de reuniones de la ciudad de Greeley <https://greeley-communicationsmeetings.com/> para obtener información sobre cómo acceder a la audiencia pública y para el paquete de información de la reunión).

Marzo 7 de marzo de 2023 a las 6:00 p.m. - La audiencia pública en la reunión del Consejo Municipal de Greeley se llevará a cabo tanto en persona como virtualmente. Las Cámaras del Consejo están ubicadas en 1001 11th Avenue y son accesibles. Si se necesitan adaptaciones adicionales, llame a la oficina del Secretario de la Ciudad 72 horas antes de la audiencia pública.

¿Tiene preguntas sobre el programa HOME-ARP o la audiencia pública? Comuníquese con Juliana Kitten, asistente del administrador de la ciudad, al 870-350-3386 o juliana.kitten@greeleygov.com. Para obtener asistencia técnica con respecto a la participación en audiencias públicas virtuales, comuníquese con la oficina del Secretario de la Ciudad de Greeley en cityclerk@greeleygov.com.

Published: Greeley Tribune February 19, 2023-1955829

Prairie Mountain Media, LLC

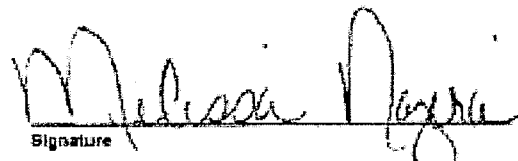
PUBLISHER'S AFFIDAVIT

County of Weld
State of Colorado

The undersigned, Agent, being first duly sworn under oath, states and affirms as follows:

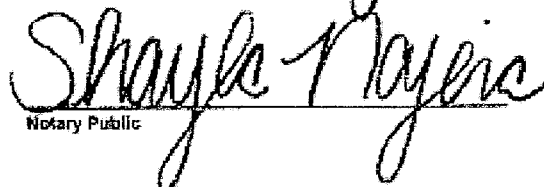
1. Halsha is the legal Advertising Reviewer of Prairie Mountain Media LLC, publisher of the Greeley Tribune.
2. The Greeley Tribune is a newspaper of general circulation that has been published continuously and without interruption for at least fifty-two weeks in Weld County and meets the legal requisites for a legal newspaper under Colo. Rev. Stat. 24-70-103.
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Feb 19, 2023


Signature

Subscribed and sworn to me before me this

20th day of February 2023


Notary Public

(SERIAL)

SHAYLA NAJERA
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20174031965
MY COMMISSION EXPIRES July 31, 2025

Account: 1199026
Ad Number: 1955829
Fee: \$54.98



ATTACHMENT C – SF424, SF424B, SF424D, HOME-ARP Certifications

See following pages

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>		
* 3. Date Received: <input type="text"/>		4. Applicant Identifier: <input type="text"/>
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text" value="M-21-MP080217"/>
State Use Only:		
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Greeley, CO"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="84-6000593"/>		* c. UEI: <input type="text" value="VJG3QJJK21X6"/>
d. Address:		
* Street1: <input type="text" value="1000 10th Street"/>		
Street2: <input type="text"/>		
* City: <input type="text" value="Greeley"/>		
County/Parish: <input type="text"/>		
* State: <input type="text" value="CO: Colorado"/>		
Province: <input type="text"/>		
* Country: <input type="text" value="USA: UNITED STATES"/>		
* Zip / Postal Code: <input type="text" value="80631-3808"/>		
e. Organizational Unit:		
Department Name: <input type="text" value="Economic Health & Housing"/>		Division Name: <input type="text" value="Greeley Urban Renewal Authority"/>
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>		* First Name: <input type="text" value="Juliana"/>
Middle Name: <input type="text"/>		
* Last Name: <input type="text" value="Kitten"/>		
Suffix: <input type="text"/>		
Title: <input type="text" value="Assistant City Manager"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="806-678-8407"/>		Fax Number: <input type="text"/>
* Email: <input type="text" value="juliana.kitten@greeleygov.com"/>		

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U. S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnership Program-American Rescue Plan

* 12. Funding Opportunity Number:

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

* 15. Descriptive Title of Applicant's Project:

Purchase/development of non-congregate shelter for qualifying populations as identified in the HOME-ARP regulations.

Attach supporting documents as specified in agency instructions.

Add Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

4th

* b. Program/Project

4th

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

17. Proposed Project:

* a. Start Date:

04/01/2023

* b. End Date:

12/31/2030

18. Estimated Funding (\$):

* a. Federal

1,481,453.00

* b. Applicant

* c. State

* d. Local

* e. Other

* f. Program Income

* g. TOTAL

1,481,453.00

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes

☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name:

Benjamin

Middle Name:

L.

* Last Name:

Snow

Suffix:

* Title:

Economic Health & Housing Director

* Telephone Number:

970-350-9384

Fax Number:

* Email:

benjamin.snow@greeleygov.com

* Signature of Authorized Representative:



* Date Signed:

3/8/23

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

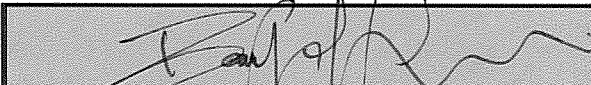
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Economic Health & Housing Director
APPLICANT ORGANIZATION City of Greeley, Colorado	DATE SUBMITTED 3-8-22

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

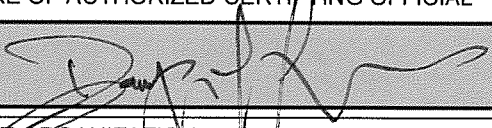
As the duly authorized representative of the applicant:, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
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15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Economic Health & Housing Director
APPLICANT ORGANIZATION City of Greeley, Colorado	DATE SUBMITTED 3/8/23

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

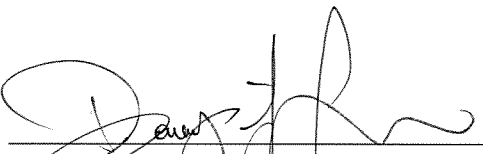
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

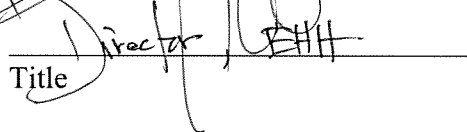
HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official

3/8/23

Date



Title

ATTACHMENT D

MEETING CIVIL RIGHTS CONSULTATION JUSTIFICATION

Civil rights are personal rights guaranteed and protected by the U.S. Constitution and federal laws enacted by Congress, such as the Civil Rights Act of 1964 and the Americans with Disabilities Act of 1990. Civil rights include protection from unlawful discrimination.

Examples of civil rights include the right to vote, the right to a fair trial, the right to government services, the right to a public education, the right to gainful employment, the right to housing, the right to use public facilities, freedom of religion.

Greeley does not have a specific agency that deals with only civil rights; however, many of our non-profit agencies work with people who could be targeted for civil rights violations. They provide significant case management and assistance in many areas and work heavily with minority and disadvantaged populations. They can provide significant support and advocacy especially in the area of fair housing, as the populations served by these non-profits are often those discriminated against because of race/ethnicity; disability; use of a housing voucher; family status, veteran status, etc. Because of the relationships built between client and non-profit, the case managers provide front-line assistance when clients encounter discrimination. The close working relationship may give clients more confidence in opening up about discrimination and violation of civil rights that may not otherwise happen.

We have tried to describe those non-profits and how they could be considered as a consultation for civil rights.

- (1) Catholic Charities operates an extended stay shelter (Guadalupe Community Center) for single adults and families, with rooms set aside specifically for veterans. They also provide shelter and support services to those exiting the community corrections system. They work as advocates for their guests to alleviate and find solutions to pressing challenges their shelter guests face daily, including finding affordable, safe housing. With the case management services provided, areas where they may provide guidance with regard to civil rights include: fair housing, veterans benefits, and employment.
- (2) Weld County Department of Human Services engages and partners with the community to improve the safety, health and well-being of individuals and families through the delivery of responsive and collaborative services. Areas of focus where they may provide guidance with regard to civil rights include housing, age (seniors), government services and benefits, veterans benefits, and employment.
- (3) United Way of Weld County in part operates the Housing Navigation Center, which exists to assist people in finding affordable, safe housing and the Cold Weather Shelter. They work not only to find housing, but to find wrap-around services for those unable to access the services on their own. Other areas of United Way focus that could include guidance for civil rights issues are children reading by age eight, assistance to young adults (Thrive by 25), supporting older adults to age well, and working with the homeless population on housing.

- (4) High Plains Housing Development Corporation is the developer and owner of affordable housing whose mission is to increase the available of housing for those with low-incomes in the community. The area of focus where they may provide guidance with regard to civil rights is housing.
- (5) North Range Behavioral Health provides services in all areas of behavioral health and for all ages of people, including treatment for substance abuse and addiction and for those in the criminal justice system. With the intensive services provided, areas where they may provide guidance with regard to civil rights include mental health disabilities, access to public facilities and treatment, and housing for persons with disabilities.
- (6) Sunrise Community Health is a community health center that offers affordable medical care. The areas of focus where they may provide guidance with regard to civil rights are physical and behavioral health care.
- (7) Greeley Family House provides shelter and case management services to families experiencing homelessness, particularly working with their clientele and landlords to secure housing. Through its case management, areas of focus where they may provide guidance with regard to civil rights are housing, family status, and access to government services.
- (8) Jobs of Hope provides shelter, case management, and peer support for men exiting incarceration and gang affiliation. The areas of focus where they may provide guidance with regard to civil rights are housing, the right to gainful employment, and access to government services.
- (9) Volunteers of America through its work with Veterans can provide civil rights guidance for accessing Veterans services, in areas of housing, and employment.
- (10) Greeley Police Department-Sgt. Patella leads the team that interacts most with people experiencing homelessness and has extensive knowledge of sex trafficking activities in the area. Through work with these populations, GPD can direct these populations to appropriate services that can help with issues of civil rights.
- (11) The Avery Center is focused on ending sex trafficking. They can help provide support so that clients are not discriminated against in housing and in finding services that can help their clients exit the sex trafficking industry.
- (12) A Woman's Place is Greeley's domestic violence shelter. They can help protect clients civil rights particularly in areas of fair housing and familial status.
- (13) Northern Colorado Veterans Resource Center provides peer support and advocacy for Veterans. They help protect a Veteran's civil rights through providing assistance in finding housing, accessing Veterans services, and employment, particularly.