



## PUEBLO, CO HOME-ARP Allocation Plan

Submitted to the U. S. Department of Housing and Urban Development  
as a Substantial Amendment to the  
2021 Annual Action Plan



**Background Paper for Proposed  
Ordinance**

**COUNCIL MEETING DATE:** March 27, 2023

**TO:** President Heather Graham and Members of City Council

**CC:** Mayor Nicholas A. Gradisar

**VIA:** Marisa Stoller, City Clerk

**FROM:** Bryan Gallagher, Director of Housing and Citizen Services

**SUBJECT:** AN ORDINANCE APPROVING AND ADOPTING A SUBSTANTIAL AMENDMENT TO THE CITY OF PUEBLO'S FY2021 ACTION PLAN INCORPORATING THE HOME INVESTMENT PARTNERSHIP AMERICAN RESCUE PLAN (HOME-ARP) ACT FUNDS ALLOCATED TO THE PUEBLO CONSORTIUM, AND AUTHORIZING THE MAYOR TO EXECUTE AND SUBMIT THE SUBSTANTIAL AMENDMENT TOGETHER WITH ALL REQUIRED AND NECESSARY CERTIFICATIONS, ASSURANCES AND DOCUMENTATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

**SUMMARY:**

This Ordinance approves a substantial amendment to the FY2021 Action Plan adopted through Ordinance No. 9975 on July 26, 2021. This amendment to the FY2021 Action Plan incorporates the HOME-ARP Grant into the FY2021 Annual Action Plan and distributes the HOME-ARP funding (\$3,090,925.00) in accordance with the HOME-ARP Allocation Plan. The U.S. Department of Housing and Urban Development's approval of the Pueblo Consortium's HOME-ARP Allocation Plan is required to access the funding.

**PREVIOUS COUNCIL ACTION:**

The City Council passed the FY2021 Annual Action Plan under Ordinance No. 9975 on July 26, 2021, and accepted the HOME-ARP Grant under Ordinance No. 10129 on March 14, 2022.

**BACKGROUND:**

As an entitlement city, the City of Pueblo is required by the U.S. Department of Housing and Urban Development (HUD) to complete an Annual Action Plan for each of the years of the Consolidated Plan. The City of Pueblo receives HOME Investment Partnership Funds through the Pueblo Consortium authorized by Ordinance No. 9899. The City is required to complete a Substantial Amendment to the Annual Action Plan

when projects are added or deleted or when the funding within the Annual Action Plan is changed by more than ten percent. This Substantial Amendment to the FY2021 Annual Action Plan incorporates the HOME-ARP Grant into the FY2021 Annual Action Plan and dedicates the HOME-ARP Grant funding in accordance with the HOME-ARP Allocation Plan included with this Substantial Amendment. The HOME-ARP Allocation Plan and the accompanying documentation serves to amend the City's original application to HUD for the FY2021 Community Development Block Grant (CDBG) and HOME Investment Partnership Act Grant (HOME).

A public meeting was held to receive citizen input and to hear applicant presentations on January 10, 2023. Notice of the proposed Substantial Amendment to the Annual Action Plan was published on February 27, 2023 and the text thereof made available to the public for review on February 28, 2023, formally opening the public comment period for fifteen-days. Public meetings were held on January 10, 2023, and March 10, 2023.

Copies were available at the City Clerk's Office, the Rawlings Library, the Department of Housing and Citizen Services (Department), and the City's website.

#### **FINANCIAL IMPLICATIONS:**

The Pueblo Consortium will have access to \$3,090,925.00 dedicated to assist homeless individuals and families, those at risk of homelessness, those fleeing domestic violence, and other populations identified in Section IV of the HUD Community, Planning, and Development Notice 21-10 published on September 13, 2021.

#### **BOARD/COMMISSION RECOMMENDATION:**

Not applicable to this Ordinance.

#### **STAKEHOLDER PROCESS:**

The following stakeholder processes were undertaken by the Department and the Pueblo County Department of Human Services. On December 21, 2022 and December 23, 2022, notice of public hearing to receive public input for the development of the HOME-ARP allocation plan was printed in *The Pueblo Chieftain*. Public hearings were held in City Council Chambers on January 10, 2023 and March 10, 2023. Six, one-hour, stakeholder sessions were held between January 25, 2023 and February 2, 2023 to gain input on the community's homeless population in the following areas: issues specific to veteran populations, issues specific to those fleeing domestic violence and human trafficking, issues related to fair housing, issues specific to the Spanish speaking population, and issues the homeless services providers have identified through their service.

#### **ALTERNATIVES:**

The City Council can choose to not to adopt the Substantial Amendment to the FY2021 Annual Action Plan and forego the HOME-ARP funds.

**RECOMMENDATION:**

Approval of the Ordinance.

**ATTACHMENTS:**

1. Pueblo\_CO\_Display HOME-ARP Plan
2. Pueblo\_SF424\_4\_0-V4.0 (002)
3. Pueblo\_SF424B-V1.1
4. Pueblo\_SF424D-V1.1

ORDINANCE NO. 10419

AN ORDINANCE APPROVING AND ADOPTING A SUBSTANTIAL AMENDMENT TO THE CITY OF PUEBLO'S FY2021 ACTION PLAN INCORPORATING THE HOME INVESTMENT PARTNERSHIP AMERICAN RESCUE PLAN (HOME-ARP) ACT FUNDS ALLOCATED TO THE PUEBLO CONSORTIUM, AND AUTHORIZING THE MAYOR TO EXECUTE AND SUBMIT THE SUBSTANTIAL AMENDMENT TOGETHER WITH ALL REQUIRED AND NECESSARY CERTIFICATIONS, ASSURANCES AND DOCUMENTATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WHEREAS, the City of Pueblo is designated as the participating jurisdiction of the Pueblo Consortium, and an entitlement city under the Housing and Community Development Act of 1974, and will receive HOME Investment Partnership, American Rescue Plan Act Grant Funds (HOME-ARP) for fiscal year 2021; and

WHEREAS, the City of Pueblo conducted a citizen participation process in accordance with the HOME-ARP requirements that included two public hearings within the City of Pueblo in addition to a third public hearing before City Council to obtain the views of citizens, non-profit, and neighborhood groups on the City's housing and community needs; NOW, THEREFORE,

BE IT ORDAINED BY THE CITY COUNCIL OF PUEBLO, that:

SECTION 1.

The City Council hereby finds and determines that the Substantial Amendment of the City of Pueblo's FY2021 Action Plan containing the HOME-ARP Grant and the HOME-ARP Allocation Plan, dedicating funding for HOME-ARP eligible programs, has been developed to give maximum feasible priority to benefit HOME-ARP Qualifying Populations based on needs identified through public and stakeholder outreach, as required by HUD, and is hereby approved, adopted, and incorporated herein.

SECTION 2.

The Mayor is hereby authorized to execute and submit, in the name of the City of Pueblo, the applications (SF-424/SF-424D) and the Substantial Amendment to the FY2021 Action Plan containing the HOME-ARP Allocation Plan, together with all required and necessary certifications, assurances, and documentation to the U.S. Department of Housing and Urban Development.

SECTION 3.

The officers and staff of the City are authorized to perform any and all acts consistent with this Ordinance to implement the policies and procedures described herein.

SECTION 4.

If any section, paragraph, clause, or provision of this Ordinance shall for any reason be held to be invalid or unenforceable, the invalidity or unenforceability of such section, paragraph, clause, or provision shall not affect any of the remaining provisions of this Ordinance.

SECTION 5.

This Ordinance shall become effective on the date of final action by the Mayor and City Council.

Action by City Council:

Introduced and initial adoption of Ordinance by City Council on March 13, 2023.

Final adoption of Ordinance by City Council on March 27, 2023.

  
\_\_\_\_\_  
President of City Council

Action by the Mayor:

☒ Approved on 3-29-2023.

☐ Disapproved on \_\_\_\_\_ based on the following objections:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

  
\_\_\_\_\_  
Mayor

**Action by City Council After Disapproval by the Mayor:**

- ☐ Council did not act to override the Mayor's veto.
- ☐ Ordinance re-adopted on a vote of \_\_\_\_\_, on \_\_\_\_\_
- ☐ Council action on \_\_\_\_\_ failed to override the Mayor's veto.

\_\_\_\_\_  
President of City Council

ATTEST

  
\_\_\_\_\_  
City Clerk

## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

4. Applicant Identifier:

HOME-ARP Grant

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

M-21-DP-08-0205

State Use Only:

6. Date Received by State:

7. State Application Identifier:

### 8. APPLICANT INFORMATION:

\* a. Legal Name:

City of Pueblo

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

84-6000615

\* c. UEI:

NJK3BNUDRHJ7

### d. Address:

\* Street1:

1 City Hall Place

Street2:

\* City:

Pueblo

County/Parish:

\* State:

CO: Colorado

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

81003-1427

### e. Organizational Unit:

Department Name:

Housing and Citizen Services

Division Name:

### f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

\* First Name:

Bryan

Middle Name:

Patrick

\* Last Name:

Gallagher

Suffix:

Title:

Organizational Affiliation:

Director

\* Telephone Number:

719-553-2849

Fax Number:

\* Email:

bgallagher@pueblo.us



## 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:

Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnership

### \* 12. Funding Opportunity Number:

\* Title:

HOME Investment Partnership Program American Rescue Plan Act (HOME-ARP)

### 13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

HOME Investment Partnership Program American Rescue Plan Act (HOME-ARP) funds assist the City of Pueblo to provide programs and housing directed to assist homeless individuals and families.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

# Application for Federal Assistance SF-424

## 16. Congressional Districts Of:

\* a Applicant

3

\* b. Program/Project

3

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

Add Attachment

Delete Attachment

View Attachment

## 17. Proposed Project:

\* a Start Date

01/01/2023

\* b End Date:

09/30/2030

## 18. Estimated Funding (\$):

\* a Federal

3,090,925.00

\* b Applicant

\* c State

\* d Local

\* e Other

\* f. Program Income

\* g TOTAL

3,090,925.00

## \* 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

Add Attachment

Delete Attachment

View Attachment

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:

Mr.

\* First Name

Nicholas

Middle Name:

A.

\* Last Name:

Gradisar

Suffix:

\* Title:

Mayor

\* Telephone Number:

719-553-2655

Fax Number

\* Email:

ngradisar@pueblo.us

\* Signature of Authorized Representative:

Nicholas Gradisar

\* Date Signed:

3-29-2023

## 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 Mayor
APPLICANT ORGANIZATION City of Pueblo	DATE SUBMITTED 3-21-2023



## 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).
9. 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.
10. Will comply with all Federal statutes relating to non-discrimination. 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.

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.
14. Will comply 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.
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).

16. 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.
17. 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.).
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
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Pueblo	3-29-2023

## 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

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Title



# THE CITY OF PUEBLO, CO

## HOME-ARP Allocation Plan

Submitted to HUD as a Substantial Amendment to the  
Approved 2021 Annual Action Plan

### Consultation

#### **Section 1: Describe the consultation process including methods used and dates of consultation.**

The City of Pueblo identified local and regional stakeholders whose organizations or agencies address the needs of the HOME-ARP qualifying populations and invited them to attend consultation sessions. Meetings were held between January 25 and February 2, 2023. All sessions were conducted via GoToMeeting. A brief PowerPoint presentation was made at the beginning of each session, providing an overview of the HOME-ARP program, definitions of the qualifying populations, a list of eligible activities that could be funded with the HOME-ARP grant and a list of questions focused on identifying the gaps and needs within the homeless system in Pueblo. A complete list of all invited stakeholders, the PowerPoint presentation and all meeting notes are included in Appendix A.

#### **Section 2: List the organizations consulted and summarize feedback received and results of upfront consultation with these entities. Required stakeholders are italicized.**

Stakeholder comments received through the various consultation sessions are included in the chart below and referenced throughout the Needs Assessment & Gaps Analysis. In the following chart, QP refers to the HOME-ARP Qualifying Populations served by the named stakeholder agency or organization and, specifically, the following four population groups:

- QP1: a homeless individual or family who lacks a fixed, regular, and adequate nighttime residence
- QP2: an individual or family with an annual income below 30% of the median family income for the area and at risk of becoming homeless
- QP3: any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking
- QP4: other populations where providing supportive services or assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability.

Date	Agency/Organization Name – HOME-ARP Qualifying Populations Served
January 25, 2023, at 9 am via GoToMeeting	<b>Focus: Continuum of Care</b> Pueblo County Dept of Human Services Independent Living Center Posada, Inc.
<b>NEEDS IDENTIFIED:</b> <ul style="list-style-type: none"> <li>• Need affordable housing units, especially for 1BR and 2BR units.</li> <li>• Need assisted living type of units for persons with brain injuries. Can't find permanent supportive housing for these households.</li> </ul>	

- Need for affordable housing units for elderly/disabled households. They typically receive a monthly check for SSI in the amount of \$841 but rents for 1BR units are between \$900-\$950 per month. Two years ago, it would only take 2 weeks to find a unit for these households, now it takes 6 months.
- 2BR units have FMRs of \$1,124 but market rates are between \$1,500 and \$1,800 per month. 3BR Fair Market Rents are \$1,800 but market rates are \$2,500-\$2,800/
- Wrap around services are needed and include:
  - Intensive Case Management
  - Life skills
  - Budgeting,
  - Tenant readiness programs
  - Access to mental health counseling
  - Substance abuse
- Barriers include:
  - Landlords are increasing rents too fast and investors buying up properties, doing minor rehab and raising rents significantly which is limiting the supply of affordable units.
  - Tenants are being forced to move due to rapidly raising rents.
  - FMRs not keeping up with rents.
  - Coordinated entry must help with addressing the barriers.
  - Criminal history is a barrier since landlords do not want to rent to individuals with criminal histories.
- Need for landlord incentives such as double deposits for tenants if they have never rented before.
- Housing coordinators planning on recruiting new landlords.
- Information from the Pueblo School District rep:
- 480 students qualify under McKinney-Vento
- School district does not have a housing program but referrals for housing have increased by 300% over last year.
- Increase of families from outside of US and/or US households moving into the Pueblo School District.
  - Evictions are increasing across the district.
  - Housing appraisal fees are really high.
  - Lack of affordable housing is a real issue.
  - Landlords selling properties which are causing evictions of families. This leads to an increased risk of homelessness.
  - Other at-risk issues are the high cost of utilities and food insecurity.
- Keeping people housed is a challenge.
- More Rapid Re-housing is needed but the challenge is finding available and affordable units. Takes 6 months to find units now.
- TBRA is needed for:
  - Elderly
  - Disabled
  - Families with children
  - Youth aging out of foster care
- Youth services are also needed.
- Need more accessible, affordable units.

January 25, 2023, at 1 pm via GoToMeeting	<b>Focus: Homeless Shelters &amp; Service Providers</b> <b>Note:</b> No shelters participated in this session due to Point-In-Time (PIT) count. We held a make-up session where shelters did participate on 2/2/23 and provided input.
<b>NEEDS IDENTIFIED:</b> <ul style="list-style-type: none"> <li>There are three homeless shelters in Pueblo- The Pueblo Rescue Mission, the YWCA, a domestic violence shelter, The Elko Family Shelter, and the cold weather warming shelter operated by Crazy Faith Ministries.</li> <li>Many families living in cars since they can't find affordable units and it can take up to 6 months for find available and affordable units.</li> <li>Need to add a permanent warming shelter.</li> <li>Information from the Pueblo School District rep who participated for second time: <ul style="list-style-type: none"> <li>480 students qualify under McKinney-Vento</li> <li>School district does not have a housing program but referrals for housing have increased by 300% over last year.</li> <li>Increase of families from outside of US and/or US households moving into the Pueblo School District.</li> <li>Evictions are increasing across the district.</li> <li>Housing appraisal fees are really high.</li> <li>Lack of affordable housing is a real issue.</li> <li>Landlords selling properties which are causing evictions of families. This causes at risk of homelessness.</li> </ul> </li> <li>Other at-risk issues are the high cost of utilities and food insecurity.</li> </ul>	
January 25, 2023, at 3 pm via GoToMeeting	<b>Focus: Domestic Violence and Human Trafficking</b> Pueblo Rape Crisis Center
<b>NEEDS IDENTIFIED:</b> <ul style="list-style-type: none"> <li>The Rape Crisis Center provided actual data for sexual assaults and human trafficking which is included in gaps and needs analysis.</li> <li>Gaps and needs include: <ul style="list-style-type: none"> <li>Victims of domestic/sexual violence need housing with services attached which also allows for children.</li> <li>Trauma services/counseling needed.</li> <li>Mental health counseling</li> <li>These are very complex cases which need lots of services.</li> </ul> </li> <li>Types of units in-demand include: <ul style="list-style-type: none"> <li>Safe and secure emergency/special housing that is not a shelter is paramount, especially those fleeing human and/or sexual trafficking.</li> <li>Need for individual, safe spaces.</li> <li>Family shelter space as well as permanent supportive housing for families</li> <li>Individual units that accept pets.</li> </ul> </li> <li>Types of services needed for those fleeing Human/Sex Trafficking: <ul style="list-style-type: none"> <li>Middle of the night services for in-take and processing of application to deal with the crisis.</li> <li>Access to comprehensive wrap around services including: <ul style="list-style-type: none"> <li>Mental health and trauma counselling that is easily accessible.</li> <li>Addiction services</li> <li>Legal assistance</li> </ul> </li> </ul> </li> </ul>	

	<ul style="list-style-type: none"> <li>▪ Immigration assistance</li> <li>▪ Multilingual assistance especially Spanish.</li> <li>• Need for safe, affordable units with wrap around services.</li> <li>• Barriers to stable housing for persons fleeing sexual and human trafficking include:             <ul style="list-style-type: none"> <li>○ Lifelong issues resulting from trauma they faced.</li> <li>○ More families living in cars for long periods of time.</li> <li>○ Legal immigrant status (i.e., fear of the system and asking for help).</li> <li>○ Speaking a language other than English.</li> <li>○ People living with trauma have a hard time jumping through the necessary hoops to maintain their housing and their health. Most are just trying to get through the day.</li> </ul> </li> <li>• Rural/low-capacity areas have issues including:             <ul style="list-style-type: none"> <li>○ Sexual violence is happening everywhere but harder to access services in these areas.</li> </ul> </li> <li>• Transportation to services is an issue.</li> </ul>
January 26, 2023, at 9 am via GoToMeeting	<p><b>Focus: Veterans Organizations</b></p> <p>Rocky Mountain Human Services, which runs various programs for Veterans including those who are homeless or at-risk of homelessness.</p> <p>Pueblo Housing &amp; Citizen Services</p>
<p><b>NEEDS IDENTIFIED:</b></p> <ul style="list-style-type: none"> <li>• Rocky Mountain Human Services offers homeless vets a shallow rent subsidy program which provide ½ of rent to a household for up to 2 years. They also offer a rapid re-housing program which serves 60-100 persons per year. They also provide case management services. The average income of the persons served is -30-50% AMI.</li> <li>• Rocky Mountain Human Services also offers a homeless prevention program.</li> <li>• Gaps in Services include:             <ul style="list-style-type: none"> <li>○ Lack of affordable, 1BR units that are available. It can take months to find a unit that will meet the programs Rent Reasonableness.</li> <li>○ 1BR units are between \$800-\$1200 per month not including utilities.</li> <li>○ Hard to find landlords that will participate in the programs. They have numerous applications for their units, and they generally select the most qualified, with the best credit scores and no criminal history.</li> <li>○ Landlords who do participate in the programs do not have any available units to rent.</li> <li>○ Homeless prevention program funds run out quickly each year. The prevention program provides funds for past due rents for tenants of units.</li> <li>○ There is a need for legal services, especially applying for social security, for the vets participating in these programs.</li> <li>○ Transportation is needed.</li> <li>○ Mental health services are needed.</li> <li>○ Budgeting assistance and financial literacy is needed.</li> <li>○ Car repair programs are needed to insure they remained employed and get to job if car breaks down.</li> <li>○ Need for housing navigator to assist vets with all housing and services needs.</li> </ul> </li> <li>• Chronic Homelessness is a big issue for vets.</li> <li>• At-Risk Issues for housing stability include:             <ul style="list-style-type: none"> <li>○ Mental health counseling</li> <li>○ Substance abuse programs</li> </ul> </li> <li>• Right Place is a new, 35-unit permanent supportive housing development that has helped to address some of the needs for affordable units. But an additional 20 units will be needed in the marketplace to achieve “functional 0” homelessness for vets.</li> <li>• TBRA could be used with several of the programs Rocky Mountain Human Services provides to keep vets housed longer once their subsidies are exhausted and to address at risk of homeless issues.</li> </ul>	

January 26, 2023, at 11 am via GoToMeeting	<b>Focus: Pueblo Housing Authority</b> Housing Authority of the City of Pueblo Pueblo Housing & Citizen Services
<b>NEEDS IDENTIFIED:</b> <ul style="list-style-type: none"> <li>Housing Authority has public housing and section 8 program. Also carries out LIHTC projects, rural housing programs, have capacity to provide project-based vouchers to units, and have 70 vouchers for veterans.</li> <li>Current market conditions include: <ul style="list-style-type: none"> <li>Housing Authority has voucher authority for 1540 units but can only put 1100 on the street. They are also encountering low utilization rates due to holders not being able to find units in the marketplace willing to accept the voucher.</li> <li>New voucher holders having trouble finding units which is resulting in the voucher expiring and the holder not able to find a unit.</li> <li>Rents have increased quickly, and they are so high now they are not affordable.</li> <li>No inventory.</li> <li>Section 8 waiting list closed in December and now is 321.</li> <li>The need is for 1BR units for younger people who are not disabled. Two-bedroom units are also needed.</li> <li>Major problem is that many landlords are selling their units and the new landlords that purchase the units immediately raise the rents to unaffordable levels.</li> <li>Many of the vouchers they manage are porting out and moving farther north of Pueblo.</li> </ul> </li> <li>They are opening the public housing on January 30<sup>th</sup> for 1BR units.</li> <li>Housing Authority has a homeless preference, but few want the units. Mainly the units available are efficiency units and are too small.</li> <li>Other preferences include for persons effected by natural disasters, the elderly, the disabled, domestic violence victims, and a working preference.</li> <li>Housing Authority considering converting some of their units to SROs but no decisions yet.</li> <li>Pueblo Housing Authority uses small area FMRs.</li> <li>Housing Authority recently raised their payment standard to 120% which has helped but only a little. Payment standards are now \$830-\$1,099 for 1BRs and up to \$1200 for 2BR units.</li> <li>Housing Authority will begin to implement a new landlord recruitment program.</li> <li>Housing Authority currently developing a tax credit project which is in the construction phase.</li> <li>Housing Authority currently going through RAD but only one development has been converted.</li> <li>Looking at the possibility of doing a Section 18 development to RAD. This would convert 73 of the units to RAD.</li> <li>Housing Authority has only PBV in their RAD conversion.</li> <li>Have a Family Self Sufficiency Program that includes the following: <ul style="list-style-type: none"> <li>Provide a case worker for each person participating in the program.</li> <li>Five-year program which helps the tenant to develop an escrow to assist in the purchase of house to for car repairs/purchase. Generally, tenant can accrue between \$15,000-\$17,000.</li> <li>Budgeting classes are provided.</li> <li>Employment services are provided.</li> <li>GED services provided.</li> <li>Can make referrals for mental health counseling if needed.</li> </ul> </li> </ul>	
January 26, 2023, at 3 pm	<b>Focus: Organizations Serving Persons with Disabilities and Persons At Risk of Homelessness</b> YWCA (Shelter) Catholic Charities

via GoToMeeting	Child Advocacy Center Pueblo Cooperative Care D60 Collaborative Management Program
<p><b>NEEDS IDENTIFIED:</b></p> <ul style="list-style-type: none"> <li>Cooperative Care/YWCA indicated the following gaps: <ul style="list-style-type: none"> <li>Need for rental assistance for those at risk of homelessness.</li> <li>Need for rent/utility assistance.</li> <li>There is a lack of affordable, accessible units.</li> <li>Shelter stays are exceeding 90 days due to lack of affordable units in the marketplace.</li> <li>Rents are extremely high.</li> </ul> </li> <li>Barriers include: <ul style="list-style-type: none"> <li>Criminal history and domestic violence effect credit worthiness and limit units available to rent.</li> <li>Lots of back balances which also follows the person and hurts their future ability to rent units.</li> <li>First month rent and security deposit requirements are very high.</li> <li>Credit issues are a problem.</li> </ul> </li> <li>Landlord issues include: <ul style="list-style-type: none"> <li>They can get higher rents in the private market and less likely to accept subsidies.</li> <li>Have difficulty dealing with low-income renters.</li> </ul> </li> <li>Need for accessible units.</li> <li>Persons with disabilities need assistance when care givers can longer care for the individual which increases the risk of homelessness.</li> <li>Services Gaps and Needs include: <ul style="list-style-type: none"> <li>Budgeting classes</li> <li>Representative payees for SSI/SS. Catholic Charities provides this service.</li> <li>Mental health services for persons with disabilities.</li> <li>Nutrition programs for house bound persons.</li> <li>Substance abuse services</li> <li>Therapy Services</li> <li>Behavioral service providers</li> </ul> </li> <li>The Child Advocacy Center indicated the need for services for youth and utility/rental assistance.</li> <li>Youth aging out of services needs include: <ul style="list-style-type: none"> <li>Therapy</li> <li>Budgeting classes</li> <li>Rental assistance</li> <li>Case management</li> <li>Wrap around services</li> <li>Job training</li> </ul> </li> <li>YWCA Shelter has 6 rooms which are split evenly for families and singles. See an increasing number of families coming into the shelter.</li> <li>Chronic unemployment is an issue for homelessness and at risk of homelessness.</li> <li>Evictions are increasing.</li> </ul>	
January 27, 2023, at 9 am via GoToMeeting	<p><b>Focus: Fair Housing and Civil Rights</b></p> <p>No one attended</p>
February 2, 2023, at 9 am via GoToMeeting	<p><b>Focus: Homeless Shelters &amp; Service Providers Make-Up Session</b></p> <p>Servicios De La Raza Pueblo Rescue Shelter Posada, Inc.</p>

	Colorado Legal Services, First Presbyterian Church Ministries (on CoC Board and Homeless Committee), Health Solutions Persons with Lived Experience ADA Advisory Committee for the City
<b>NEEDS IDENTIFIED:</b> <ul style="list-style-type: none"> <li>• Servicios De La Raza, Inc. provides the following programs/services:             <ul style="list-style-type: none"> <li>○ Re-entry program</li> <li>○ Case Management and telehealth services</li> <li>○ Victim services</li> <li>○ Behavioral health</li> <li>○ Food Pantry</li> </ul> </li> <li>• Colorado Legal Services, which is state funded, provides the following services:             <ul style="list-style-type: none"> <li>○ Eviction diversion program</li> <li>○ Rental assistance</li> <li>○ They assist the HA to prevent evictions in Public Housing and Section 8 Housing.</li> <li>○ Have an Eviction Defense fund.</li> <li>○ Manage CSBG program grant funds.</li> <li>○ Indicated that there are currently 456 eviction cases that they are working on.</li> <li>○ Could use local funds for some of these programs once state funds are exhausted.</li> </ul> </li> <li>• Keeping people housing is a big issue.</li> <li>• Posada, Inc. participated and indicated the following:             <ul style="list-style-type: none"> <li>○ Provide services to the homeless including emergency shelter for families/children.</li> <li>○ Have a transition shelter facility for homeless youth.</li> <li>○ Operates 126 units of permanent housing units including:                 <ul style="list-style-type: none"> <li>▪ Rapid re-housing</li> </ul> </li> <li>○ Have a new program for vets.</li> <li>○ They are a CHDO.</li> <li>○ Have a new SRO project for homeless seniors which is opening soon.</li> <li>○ Indicated need for more affordable housing.</li> <li>○ Recently had a proposed 192-unit affordable housing tax credit project but could not move forward with it since they were unable to get the site re-zoned.</li> </ul> </li> <li>• Unhoused population is significantly impacted by race/ethnicity since persons of color are more likely to be homeless.</li> <li>• Gaps/Needs include:             <ul style="list-style-type: none"> <li>○ No housing units available.</li> <li>○ Less than 1% of available units are affordable in Pueblo.</li> <li>○ Developers are buying up properties and then flip them and increase rents to unaffordable levels.</li> <li>○ Pueblo has large population of low-income persons.</li> <li>○ Need for low barrier housing especially permanent supportive housing,</li> <li>○ Those coming out of incarceration have had time finding units due to criminal backgrounds.</li> <li>○ Need for 1BR units.</li> <li>○ Need for Housing Navigator Services to help homeless get housing and the necessary services that are needed.</li> <li>○ Transportation to address poor bus routes for people needed to get to services.</li> <li>○ Childcare.</li> <li>○ Wrap around services attached to permanent affordable housing.</li> <li>○ Mental health services</li> <li>○ Landlord application and deposit fees especially as it relates to coordinated entry.</li> <li>○ Need safe spaces in parking lots/camping sites for the unhoused that have services already.</li> </ul> </li> </ul>	

- There is a new Built for Zero Program which helps to stabilize persons who are homeless and are need of assistance with day to day living. There is a need in this program for “walk along” services to help move people from shelters to permanent supportive housing.
- City issues vagrancy tickets to the homeless which could be a violation of civil rights. Once someone gets one of these tickets, they have a hard time getting units to rent.



# Public Participation

[To be completed following the 15-day public comment period and public hearing.]

**Section 1: 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:*** Click or tap to enter a date.
- ***Public comment period: start date*** - Click or tap to enter a date. ***end date*** - Click or tap to enter a date.
- ***Date(s) of public hearing:*** Click or tap to enter a date.

***Describe the public participation process:***

Enter narrative response here.

***Describe efforts to broaden public participation:***

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

## Needs Assessment & Gaps Analysis

The City of Pueblo is the lead entity for the City of Pueblo/Pueblo County Participating Jurisdiction (PJ) in the HOME Investment Partnerships program. As the lead entity, the City is the responsible entity for submitting the HOME-ARP Allocation Plan on behalf of the Consortium. Both the City and the County are part of the Colorado Balance of State Continuum of Care (CoC).

This section presents the needs and gaps analysis, drawing on CoC HMIS data through Annual Performance Reports for the calendar year 2022, the 2023 Housing Inventory Count (HIC) data for the City of Pueblo, and several other sources as identified. Point-in-Time (PIT) Count data was not complete. This analysis is contextualized with feedback from stakeholders consulted during the HOME-ARP planning process.

### **Section 1: Housing Inventory**

There is an extreme shortage of affordable rental housing in Pueblo that impacts the ability of housing and service providers to rapidly re-house or place homeless and at-risk homeless persons and families in stable living situations within 30 days.

The shortage of units for households at 0-30% area median income (AMI) and 31-50% AMI increases housing insecurity and rent pressure on lower-income households. Within the rental housing inventory, there is a severe housing gap for households at 0-30% and 31-50% AMI (see Table 1). According to CHAS data, there are 6,885 renter households at 0-30% AMI. However, there are only 4,760 rental units affordable to this group of households. Further exacerbating the situation is that only 1,030 of these 4,760 affordable units are occupied by 0-30% AMI households. The remaining 3,730 units are occupied by households with incomes above 30% AMI. ***This results in a housing gap of 5,855 rental units affordable and available to 0-30% AMI renter households.***

Moving up the income spectrum, there are 4,095 renter households at 31-50% AMI. For this income group, there is a supply of 8,849 units affordable to them. However, only 1,145 of the 8,849 units are occupied by 31-50% AMI households. The remaining supply of 7,704 units is occupied by households of other income tiers. ***This results in a housing gap of 2,950 rental units affordable and available to 31-50% AMI renter households.***

**Table 1. Pueblo Housing Gap Analysis**

Renter Households	0-30% AMI	31-50% AMI
Total Households	6,885	4,095
Affordable Housing Units	4,760	8,849
Units Occupied by Appropriate Income Tier	1,030	1,145
Units Occupied by Other Income Households	3,730	7,704
<b>Gap</b>	<b>5,855</b>	<b>2,950</b>

Data Source: 2015-2019 Comprehensive Housing Affordability Strategy

<sup>1</sup> Number of housing units occupied by a household of the same income tier (i.e., a 0-30% AMI household occupies a unit that is affordable to a 0-30% AMI household)

<sup>2</sup> Number of housing units occupied by a household that is not of the same income tier (i.e., a 0-30% AMI unit is occupied by a household above 30% AMI)

<sup>3</sup> Total Number of Households minus Units Occupied by Appropriate Income Tier equals the number of units needed to house the balance of the households within that income tier that are occupying units affordable to households above their income tier (i.e., the housing gap).

During the January 2023 PIT count, 93% of the emergency shelter beds, 51.2% of the Permanent Supportive Housing beds, 100+% of rapid rehousing beds, and 96.1% of transitional housing beds were full. Total utilization of all beds was 89.7%. Stakeholders indicated emergency shelter stays are exceeding 90 days due to lack of affordable units available for rent in the marketplace.

*In the following table, the Gap Analysis lacks statistical confidence without current Point-in-Time Count data which has not been released. The data in the table below represents the total number of homeless persons in families who were identified in shelters (234) on the night of the count, and those identified in HMIS as living in a place unfit for habitation. See Section 8 of the Needs Assessment & Gaps Analysis for other data sources used to supplement this data limitation.*

**Table 2. Pueblo Homeless Needs and Gap Analysis**

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# Beds	# Units	# Beds	# Units	# Beds					# Beds	# Units	# Beds	# Units
Emergency Shelter	40	20	-100	-	-								
Rapid Rehousing	45	20	-	-	-								
Permanent Supportive Housing	41	19	-35	-35	-								
Transitional Housing	76	24	-	-	-								
Sheltered Homeless						69	283	22	9				
Unsheltered Homeless						65	148	20	-				
<b>Current Gap</b>										125	67	177	177

Sources: HUD 2023 CoC Homeless Report Assistance Programs Housing Inventory Count Report, Colorado Balance of State CoC

Note: Point-in-Time Count data was not available.

## **Section 2: Size and Demographic Composition of Qualifying Populations**

To analyze the size and demographic composition of the qualifying populations (QPs), the City of Pueblo's Homeless Management Information Systems (HMIS) Annual Performance data for calendar years 2021 and 2022 were analyzed.

### ***1. Homeless as defined in 24 CFR 91.5***

Under the HOME-ARP program, the homeless QP is defined to include:

- An individual or family who lacks a fixed, regular, and adequate nighttime residence
- An individual or family who will imminently lose their primary nighttime residence within 14 days
- Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition

At the time of the January 2023 PIT Count, according to the Housing Inventory Count, there were 261 individuals that met the definition of homeless under 24 CFR 91.5. These included individuals and families residing in emergency shelter, transitional housing, and rapid rehousing beds/units. No other PIT count data was available.

According to the APR, a total of 754 homeless persons were served by homeless programs. Of these, 49.3% were adult males, 30.9% were adult females, 9.2% were male children, and 10% were female children. This means nearly 20% of those served were children. By race and ethnicity, 587 individuals (77.9%) were White, 58 (7.7%) were Black/African American, 55 (7.3%) were American Indians, and 333 (44.2%) were Hispanic/Latino. This indicates a disproportionate representation of Black/African American individuals and American Indian individuals impacted by homelessness as only 2.8% of the general population in all of Pueblo County is Black/African American and only 3.4% is American Indian.

According to the 2022 CoC Performance Measurement Module, the average length of stay within the homeless system was 251 days, a decrease of 13.2% from 289 days in 2021. In addition, there was a 7% decrease in the number of unduplicated individuals served and a decrease of 8.7% among persons who were homeless for the first time. In total, there were 450 individuals experiencing homelessness for the first time with an average length of stay of more than eight months in 2022. These figures indicate a need for more affordable rental housing.

According to the Pueblo School District, 480 students qualify as homeless under the McKinney-Vento Act. The District does not have a housing program, but referrals for housing have increased by 300% over the last year. There is also an increase in families who have immigrated to the US and native US households moving into the Pueblo School District.

### ***2. At Risk of Homelessness as defined in 24 CFR 91.5***

Under the HOME-ARP program, the definition of persons at risk of homelessness includes an individual or family who:

- Has an annual income below 30% of median family income for the area
- Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place, and meets other qualifying conditions

The definition also includes a homeless child or youth and the parents or guardians of that child or youth if living with them.

CHAS data identified a total housing gap of 5,885 rental units affordable and available to households at 0-30% AMI and 2,950 rental units affordable and available to households at 31-50% AMI across all of Pueblo County. This significant housing gap for the two lowest income groups among renters means that most of the households in need of these units are currently residing in units where they are paying more than 30% of their income on housing costs, making them cost-burdened. These households are at risk of becoming homeless should they experience a job loss or a decrease in their hours, a medical emergency, or any of a myriad of unexpected events that could cause them to miss one or more rent payments.

Exiting the homeless system to temporary destinations can increase the risk of someone returning to homelessness. Among homeless persons who exited programs in 2022, 25.5% did so to temporary destinations with 13.4% of those to places not meant for human habitation. Individuals who exit to temporary destinations, including locations not meant for human habitation, face a greater risk of housing instability than those exiting to permanent destinations.

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

Under the HOME-ARP program, this qualifying population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.

The YWCA's Victims of Crime Act Report (VOCA) for July 1, 2021, through June 30, 2022, identified 348 individuals who received services, of which 281 received services for the first time. Of the 281, 47.7% were White, 5.7% were Black/African American, and 41.3% were Hispanic/Latino. The vast majority were female (87.9%). In terms of age, 14.6% were under 18 years old, 12.1% were aged 18-24, and 2.8% were 60 and older. And 8.2% of the newly served individuals had a cognitive, physical, or mental disability. As with the general homeless population, Black/African Americans are disproportionately impacted by domestic violence than other racial/ethnic groups.

The Colorado Human Trafficking Hotline and the Pueblo Rape Crisis Services were contacted 14 times in 2022 by individuals in Pueblo County. Of those, eight were tips, two were referrals, two were informational, and two were for companionship and/or counseling. Additionally, two individuals who reached out were survivors, five were friends or family members of suspected survivors, six were community members, and one was from local law enforcement. Between 2013 to 2022, the service received a total of 67 contacts from Pueblo County. In 2022, the Pueblo Rape Crisis Services served 182 primary victims, 111 secondary victims, and fielded 130 hotline calls. Among the primary victims served, 18% were unhoused.

***4. 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***

Under the HOME-ARP program, this qualifying population includes families where providing supportive services or assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability.

**Severely Cost-Burdened Households:** Those at greatest risk of housing instability include 4,285 renter households at 0-30% AMI and experiencing severe cost burden (paying more than 50% of income for housing costs). This represents 22.4% of all renter households in the County. In addition, 750 renter households at 30%-50% AMI pay more than 50% of their income on housing. These 5,035 households represent a population in need of rental subsidies to maintain their housing.

**Elderly:** According to the 2022 APR, 9.2% of persons accessing programs were aged 62 years or older. Further complicating the problem is the concern of safety when housing elderly individuals in a temporary shelter. Many are in wheelchairs and/or have severe mobility challenges which cannot be easily accommodated in shelters.

### **Section 3: Current Resources Available to Assist Qualifying Populations**

#### ***Homeless Qualifying Population***

The following housing resources are available in the City of Pueblo/Pueblo County:

- Emergency Shelters: Two year-round shelters with 140 beds/20 units
- Rapid-Rehousing: 45 beds/20 units
- Transitional Housing: 76 year-round beds/24 units
- Permanent Supportive Housing: 41 year-round beds/19 units

During the January 2023 PIT count, 93% of the emergency shelter beds, 51.2% of the Permanent Supportive Housing beds, 100+% of rapid rehousing beds, and 96.1% of transitional housing beds were full. Total utilization of all beds was 89.7%. Stakeholders indicated emergency shelter stays are exceeding 90 days due to lack of affordable units available for rent in the marketplace.

Rocky Mountain Human Services offers a shallow rent subsidy program for homeless veterans, which provides half the to a household for up to two years. They also offer a rapid re-housing program that serves 60-100 persons annually and provide case management services.

Servicios De La Raza, Inc. provides the following programs/services: re-entry program, case management and tele-health services, victim services, behavioral health services, and food pantry.

Posada, Inc. provides the following services: emergency shelter for families/children, a transition shelter facility for homeless youth, operates 126 housing units including rapid re-housing, operate a new program for veterans, and will be opening a new SRO project for homeless seniors.

The Pueblo Housing Authority administers traditional public housing, one RAD development, and a Housing Choice Voucher program with 70 vouchers for veterans.

***At-Risk of Homelessness Qualifying Population***

Colorado Legal Services provides the following services: eviction diversion program, rental assistance, eviction prevention with an eviction defense fund, and access to CSBG program grant funds.

***Persons Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking Qualifying Population***

Pueblo Rape Crisis Center provides case management, an Online HelpRoom, community referrals, crisis hotline, hospital response, court accompaniment, victim's rights services, victim compensation, prevention education, community education, and group trainings.

***Other Qualifying Populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability***

Rocky Mountain Human Services offers a homeless prevention program.

Colorado Legal Services provides the following services: eviction diversion program, rental assistance, eviction prevention with an eviction defense fund, and access to CSBG program grant funds.

**Section 4: Describe the Unmet Housing and Service Needs of Qualifying Populations**

According to stakeholders, there is a great need for affordable rental housing, especially 1- and 2-bedroom units. The need has been exacerbated by increased competition due to a lack of inventory, increasing rental rates, and landlords who are no longer interested in participating in voucher programs. Subsidized rental units fill quickly because there is strong demand. There are landlords who are no longer willing to accept rental subsidies due to higher market rents that are obtainable from households without vouchers. Further compounding the challenge are investors buying up properties, completing minor rehabilitation elements, and then raising rents significantly, which is also limiting the supply of affordable units. Stakeholders also identified a need for a warming shelter.

***1. Homeless as defined in 24 CFR 91.5***

The 2022 APR listed 754 individuals served by the homeless system. According to the 2022 HIC, Pueblo has two emergency shelters, one Rapid Rehousing, two Permanent Supportive Housing, and three Transitional Housing organizations. As mentioned above, at the time of the January 2023 PIT count, all beds were at an 89.7% utilization rate. Additional Rapid Rehousing and Transitional Housing facilities are an immediate need.

Stakeholders expressed a need for larger building accommodations for overnight shelter space for persons who are service-resistant and not interested in a longer-term stabilization program. Engaging in and building relationships with service-resistant clients is made more difficult when unsheltered clients are shuffled to churches or bus stations for shelter. The connection opportunity is lost and their situation remains unchanged. There is a need for increased staffing capacity to meet the unique needs of this

population to shelter more each night. Emergency shelter clients present with more intense behaviors resulting from mental illness and addiction, both of which require more intense supervision from a security standpoint to ensure the safety of staff and other clients.

Crazy Faith Ministries operates their church as an Emergency Overnight Warming Center during the winter months for those in need. Their capacity is 50 individuals, but many nights they are operating over capacity at 65. Additionally, the center has served over 25,000 meals during 2022 and housed and fed 2,400 people so far during the 2022-2023 winter season. The group of people that served at the warming center often are not looking for housing. They are content living on the streets and/or camps; however, on freezing cold nights, they seek a safe place to get out of the cold. Of those staying at the warming center, 99% have voiced that they either will not or cannot stay at the other Homeless Shelter (Pueblo Rescue Mission). For those that go to the warming center and are seeking to get out of homelessness, staff can assist them. Funding is needed to get them into places. Often, they are put into a motel for 1-3 months, until the center is able to get them into affordable housing. However, this is one of the most difficult challenges with such a scarcity of affordable rental units.

Stakeholders discussed how chronically homeless individuals are not equipped or able to conform to standards required by most landlords. Declining mental health, drug and alcohol addiction deem them unsuitable candidates for housing standards that most landlords require. This further strengthens the need for no-fee rental applications, a universal rental application, and a single source directory listing all rentals available in the Pueblo community. There is also a need for more felon-friendly housing opportunities and a tenant ethics programs that can certify clients enabling them to be better educated about their civic responsibilities as renters. Unsheltered individuals who cannot live independently need easier access to obtain Medicaid to qualify them for long-term care, group homes, and assisted living facilities.

Stakeholders stated that Pueblo has become a hot spot for the homeless over the last four years, which further strains the capacity of the homeless system.

## ***2. At Risk of Homelessness as defined in 24 CFR 91.5***

According to the [Center on Budget and Policy Priorities](#), the average wait time for households in Pueblo County to receive housing vouchers is 12 months during which time persons who are homeless must struggle to find other living arrangements, regardless of the cost, housing condition, location, and lack of safety.

Pueblo Housing Authority (HA) has HCV authority for 1,540 vouchers but has only 1,100 vouchers currently in use. PHA has a low utilization rate due to voucher holders not being able to find units in the marketplace willing to accept the voucher. New voucher holders are having trouble finding units, resulting in the voucher expiring and the holder not able to find a unit. Further complicating the problem, rent has increased quickly and is no longer affordable to the voucher holder. The HVC waiting list closed in December 2022 and is now at 321 applicants.



Cost burden among 0-30% AMI and 31-50% AMI households is high in Pueblo. Among the lowest income group, 76.3% of all renter households are cost burdened; 62.3% are severely cost-burdened. In other words, nearly 8 in 10 renters at 0-30% AMI are living in housing they cannot afford. Among the 4,095 renters at 31-50% AMI, 70.9% are cost-burdened; however, the degree of severe cost burden is significantly less among this income group. These households reside in housing units that are more costly than what would be considered affordable to them. Moreover, this does not consider additional living expenses such as food, health care, transportation, childcare, and such. Stakeholders confirmed that the supply of affordable options for housing persons and families exiting the homeless system is severely insufficient to meet growing needs among the qualifying populations.

**Table 3. City of Pueblo Cost-Burdened Renter Households**

	Total		Cost-burdened		Severely Cost-burdened	
	#	%	#	%	#	%
Total Renters	19,165	100.0%	9,890	51.6%	5,280	27.6%
30-50% AMI	4,095	21.4%	2,905	70.9%	750	18.3%
0-30% AMI	6,885	35.9%	5,255	76.3%	4,285	62.3%

Source: CHAS data, 2015-2019

Stakeholders stated the importance of working with those in need before they become homeless. An increase in programs and outreach would be more proactive and save individuals from the timely struggle of getting back on track. Programs should be more proactive as opposed to reactive. The issue of generational financial struggles and homelessness needs to be addressed. It can be especially difficult to change circumstances that most have only ever known. Stakeholders are noticing this trend and are currently helping many multi-generational families experiencing poverty and homelessness.

Due to the expiration of eviction moratoria, which offered protection for many low-income renter households, coupled with escalating rents, lack of affordable housing inventory, and continued economic effects of the COVID-19 pandemic, the homeless system in Pueblo experienced significant strains. It lacks the capacity across all systems to address the unmet needs of all qualifying populations. This includes staff capacity, inventory capacity, and resource capacity to appropriately address growing needs among all of the QPs. Service providers and shelters alike are experiencing ongoing staffing shortages that contribute to these capacity challenges in the face of a rapidly changing housing market.

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

According to stakeholders, clients fleeing domestic violence are in immediate need of safe emergency shelter and shelters are not always the best for persons with children who are fleeing. Family units are needed. Additionally, housing units with 2- to 3-bedrooms are ideal for those fleeing with children. Longer-term private housing units are needed to keep victims safe from their abusers. Rental assistance is needed as some abusers will stop paying family court-ordered rent which can cause the eviction of a survivor. There is no emergency funding source to assist these households to help avoid eviction. Additional services needed for these households include therapy and substance abuse services,

counseling (and for children), job readiness, and financial planning. There is a need for affordable childcare and transportation.

In terms of those who experienced human trafficking, stakeholders reported a need for safe and affordable housing as well as therapy and trauma/therapeutic services. Victims of domestic/sexual violence need housing with services attached for both adults and children.

Types of housing units needed for this QP include:

- Safe and secure emergency/special housing that is not in a shelter is paramount, especially for those fleeing human trafficking
- Individual, safe spaces
- Family shelter space as well as permanent supportive housing for families
- Individual units that accept pets

Types of services needed for this QP include:

- Middle-of-the-night services for intake and processing of applications when crises occur
- Access to comprehensive wrap-around services including: easily accessible mental health and trauma counseling, addiction services, legal assistance, immigration assistance, and multilingual language assistance especially Spanish.

Stakeholders indicated barriers to stable housing for persons fleeing human trafficking include lifelong issues as a result of the trauma they experienced. People living with trauma have a difficult time going through the necessary steps to maintain their housing and their health. Many are in survival mode and struggle with day-to-day responsibilities. There are also more families living in cars for long periods of time. Individuals and households in rural/low-capacity areas have a harder time accessing services, particularly with a lack of transportation to services.

#### ***4. 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***

**Veterans:** The 2022 Annual Performance Report identified 37 homeless veterans. Continuity of assistance is important so veteran households do not regress, and have to start over identifying services and housing options. Providing permanently affordable options with supportive services could help address this need. Rocky Mountain Human Services offers a shallow rent subsidy program for homeless veterans, which provides half the to a household for up to two years. They also offer a rapid re-housing program that serves 60-100 persons annually and provide case management services.

**Persons with Disabilities:** Over 80% of homeless individuals assisted listed a physical, mental, or chronic health condition. For people with disabilities, accessible housing is a continuing and critical need, ranging from individuals in wheelchairs to medical beds and in-home healthcare services in order to maintain housing stability. There is a severe need for permanent supportive housing that can accommodate persons with disabilities.

Stakeholders indicated a need for assisted living type of units for persons with brain injuries as they cannot find permanent supportive housing for these households. There is a need for affordable housing units for

elderly/disabled households who receive a monthly SSI check in the amount of \$841. With rent for a 1-bedroom unit between \$900-\$950 per month, these households cannot afford to rent without a subsidy. According to stakeholders, two years ago it would only take two weeks to find a unit for these households; now, it takes six months.

The 2021 [Pueblo Housing Assessment and Strategy](#) reported the 2019 PIT identified more than 250 individuals/ families at imminent risk of homelessness. About 50% of those identified are affected by chronic physical disability or mental illness. Additionally, almost 21% of the City population identified as having a physical or cognitive disability. More than 39% of citizens with a disability are living below the poverty line.

According to the Co-Chair of the Pueblo ADA Committee, at the time of the January 2022 PIT count, 56% of the unhoused persons had one or more disabilities indicating a need for more services for this population.

**Youth:** The APR lists 54 individuals accessing programs who were aged 18-24. According to stakeholders, Anchor Housing, Inc. developed Connect Home which has 20 vouchers for youth aging out of foster care (18-21 year olds). This program is encountering issues with placing vouchers including difficulty finding landlords to accept the vouchers, the tenant assessment questionnaire that landlords use to screen tenants almost automatically excludes those with vouchers, and the FMRs for vouchers are not high enough to meet market rates rents which limit the number of available units in the marketplace.

### **Section 5: Identify Gaps within the Shelter, Housing Inventory, and Service System**

Based on the stakeholder consultations and data analysis, the following gaps were identified.

- There is a housing gap of 8,805 rental units affordable and available for 0-30% AMI and 31-50% AMI renter households.
- According to stakeholders, 1-bedroom and 2-bedroom affordable units are the most in demand to house persons and families exiting the homeless system.
- Wrap-around services, including case management, are needed. Other needed services include employment training, transportation, financial literacy, childcare, mental and physical health care, etc. In addition, affordable, subsidized, felon-friendly, housing, assisted living facilities, group homes and long-term care housing.
- Only about 58.5% of those who exited homelessness in 2022 did so to positive destinations.
- There are 5,035 renter households that are in need of rental subsidies to maintain their housing, equivalent to more than 30% of all City renters.
- There is a need to extend services to low capacity or rural area residents. Service agencies lack the staffing capacity to expand to outlying areas and provide dedicated resources and services. Operational support is integral to the continued provision of services. Augmenting operating dollars is needed to ensure that programs can have the financial supports necessary to expand staff to extend service delivery.
- Response time and extended lengthy steps are barriers to getting clients engaged with prescribers for mental health and addiction treatment. There is a need to have organizations have multi-disciplinary team meetings with each other to maximize benefits to clients.

**Section 6: Additional Characteristics Associated with Instability and Risk of Homelessness**

No additional comments.

**Section 7: Identify Priority Needs for Qualifying Populations**

Based on stakeholder consultations and data analysis, the priority needs among the Qualifying Populations are affordable and supportive housing solutions. This includes, but is not limited to, the following:

- Affordable rental housing for 0-30% AMI households
- Increase in Rapid Rehousing and Transitional Housing facilities
- Emergency shelter expansion for those fleeing domestic violence, sexual violence, sexual assault, dating violence and human trafficking
- Emergency or transitional housing for youth fleeing from sex trafficking
- Increased investment in supportive services
- Need for Housing Navigator Services to help the homeless get housed and receive the necessary services
- TBRA is needed for the elderly, the disabled, families with children and youth aging out of foster care

**Section 8: How the Level of Need and Gaps was Determined**

In addition to feedback from stakeholder consultation sessions, the following sources were consulted to determine the housing and service needs and gaps for HOME-ARP qualifying populations:

- American Community Survey (ACS), 2017-2021
- HUD Comprehensive Housing Affordability Strategy (CHAS), 2015-2019
- Colorado Balance of State Continuum of Care 2023 Housing Inventory Count (HIC)
- City of Pueblo HUD Annual Performance Report, 01/01/2022 – 12/31/2022
- YWCA's Victims of Crime Act Report (VOCA) for 07/01/2021-06/30/2022
- The *Pueblo Housing Assessment and Strategy* report from September 2021
- [Center on Budget and Policy Priorities](#),

# HOME-ARP Activities

## **Section 1: Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors**

Pueblo will utilize open, competitive solicitations for proposals through a Request for Proposals (RFP) and create additional application processes, if necessary, all of which will be in alignment with HOME, HOME-ARP, and OMB regulations, as well as city procurement rules and processes. Information on the qualified populations and program requirements will be included at the time of application/proposal solicitation, submission, and review. In order to be as efficient as possible with the funds, existing solicitation methods will be used to accept applications for HOME-ARP funding. Applicants will be provided with documentation on HOME-ARP-specific requirements as supplements to these existing processes prior to the time of application or during the application process.

In addition to soliciting applications through a HOME-ARP RFP, Pueblo may provide HOME-ARP funding to developers that have applied, or will apply, for Low-Income Housing Tax Credit (LIHTC) projects proposed where an unmet need for qualifying populations was identified through the needs assessment.

The RFP for the development of affordable rental housing will include bonus points that leverage other resources, such as project-based rental assistance. Proposals will be evaluated according to criteria such as organizational or developer experience, capacity, demonstrated effective grant management experience, services offered, housing need, project readiness, and leveraged resources, among other factors. The RFP process for both eligible activities will be finalized once HUD approves the city's Allocation Plan.

## **2. Describe whether the PJ will administer eligible activities directly:**

The City of Pueblo will not administer its HOME-ARP activities directly other than administration and planning activities.

## **3. 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:**

No HOME-ARP administrative funds have been provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

**Table 4. Use of HOME-ARP Funding**

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 472,740.00		
Acquisition and Development of Non-Congregate Shelters			
Tenant Based Rental Assistance (TBRA)			
Development of Affordable Rental Housing	\$ 2,000,000.00		
Non-Profit Operating	\$ 154,546.25	5 %	5%
Non-Profit Capacity Building	-	0 %	5%
Administration and Planning	\$ 463,638.75	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 3,090,925.00</b>		

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

The HOME-ARP budget was driven by the priority needs identified as a result of stakeholder consultation and thorough data analysis. Pueblo's budget reflects the planned development of affordable rental units and the provision of supportive services. This decision was based on the following priority needs:

- Increased affordable rental housing for individuals and families (all QPs)
- Increased supportive services (all QPs)

Pueblo will allocate 64.7% of its HOME-ARP grant toward the development of affordable rental housing for qualifying populations. Another 15.3% of funds will be invested in supportive services for all qualifying populations. Five percent of the grant is allocated for nonprofit operating expenses for nonprofit organizations that receive HOME-ARP funding for another eligible activity. The remaining 15% will be allocated to program administration.

**5. 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 need to increase the inventory of affordable rental units and expand supportive services in Pueblo for HOME-ARP qualifying populations is based on the following:

- There is a housing gap of 8,805 rental units affordable and available for 0-30% AMI and 31-50% AMI renter households.
- According to stakeholders, 1-bedroom and 2-bedroom affordable units are the most in demand to house persons and families exiting the homeless system.
- Wrap-around services, including case management, are needed. Other needed services include employment training, transportation, financial literacy, childcare, mental and physical health care, etc. In addition, affordable, subsidized, felon-friendly, housing, assisted living facilities, group homes and long-term care housing.
- Only about 58.5% of those who exited homelessness in 2022 did so to positive destinations.
- There are 5,035 renter households that need rental subsidies to maintain their housing, equivalent to more than 30% of all City renters.

- There is a need to extend services to low capacity or rural area residents. Service agencies lack the staffing capacity to expand to outlying areas and provide dedicated resources and services. Operational support is integral to the continued provision of services. Augmenting operating dollars is needed to ensure that programs can have the financial supports necessary to expand staff to extend service delivery.
- Response time and extended lengthy steps are barriers to getting clients engaged with prescribers for mental health and addiction treatment. There is a need to have organizations have multi-disciplinary team meetings with each other to maximize benefits to clients.

## HOME-ARP Production Housing Goals

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

Pueblo estimates it can create 5-6 affordable rental housing units at a cost of \$300,000-\$325,000/unit. This estimate may change depending on project applications and the layering of other funding sources.

**2.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:**

Pueblo estimates the development of 5-6 affordable rental housing units for qualifying populations will assist in increasing the inventory of deeply affordable housing with the goal of assisting persons who are staying in emergency shelters, transitional housing, and rapid rehousing for several months due to a lack of affordable rental housing as well as those who are cost burdened.



# Preferences

**Section 1: 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:**

Pueblo will provide access for all Qualifying Populations but will include a preference for chronically homeless individuals and families giving them priority for admission above all other Qualifying Populations. All other Qualifying Populations will be served on a first-come, first-served basis (i.e., in chronological order). In addition, chronically homeless individuals and families will be prioritized for admission based on the length of time they have been homeless.

**Section 2: 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:**

A preference for the chronically homeless was identified to give the highest priority to individuals and families who have the greatest need for permanent affordable rental housing with a strong component of supportive services to prevent recidivism and maintain stable housing.

**3.If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference.**

Pueblo will establish a preference for chronically homeless individuals and families for its HOME-ARP activities. All other eligible Qualifying Populations will be selected in chronological order for any rental units not occupied by chronically homeless QP applicants. Chronically homeless QP applicants will be prioritized for admission for occupancy based on the length of time they have been homeless.

## Referral Methods

**1. 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):**

Pueblo intends to use a project-specific waiting list for its HOME-ARP activities, providing access to apply for placement for all Qualifying Populations with a preference for homeless individuals and families. The City will work with its local and regional stakeholders to identify eligible individuals and families.

**2. 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):**

Pueblo intends to use a project-specific waiting list for its HOME-ARP activities, providing access to apply for placement for all Qualifying Populations with a preference for homeless individuals and families. The City will work with its local and regional stakeholders to identify eligible individuals and families.

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

Not applicable.

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

Not applicable.

## Limitations in a HOME-ARP Rental Housing

**1. 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:**

Pueblo will not include any limitations for eligibility for its HOME-ARP program.

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

Not applicable.

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

Not applicable.

## Appendix A: Stakeholder Consultation Materials

## Appendix B: Public Participation Materials