



**REGULAR CITY COUNCIL MEETING  
CITY COUNCIL CHAMBERS – CITY HALL  
#1 CITY HALL PLACE  
MONDAY, DECEMBER 22, 2025 - 7:00 PM**

**MINUTES**

**A. CALL TO ORDER**

President Aliff called the meeting to order at 7:20 p.m.

**B. INVOCATION**

**C. PLEDGE OF ALLEGIANCE**

**D. ROLL CALL**

**Council Members Present:** Mark Aliff, Brett Boston, Dennis Flores, Roger Gomez, Joe Latino, Regina Maestri, Sarah Martinez.

**Council Members Present via Zoom:** None.

**Council Members Absent:** None.

**Administrative Staff Members Present:** Mayor Heather Graham, Chief of Staff Brian McCain, City Attorney Carla Sikes, Deputy City Clerk Vincent Petkosek.

**E. SPECIAL RECOGNITIONS**

**F. PUBLIC FORUM**

- Brett Verna - Genera 2
- Sally Moore - Keylime Contract
- Barbara Ripperger - Keylime
- Elvis Martinez (zoom) - Thank you

**G. COUNCIL MEMBER AND MAYOR COMMENTARY**

Council members expressed comments regarding community-related issues and events/functions they attended.

**H. REVIEW OF AGENDA**

The agenda was reviewed page by page.

**I. APPROVAL OF AGENDA**

Councilor Boston, seconded by Councilor Latino, moved to amend the agenda by postponing S3 to the January 12, 2026, meeting and approve the agenda as amended.

Roll Call - **Ayes:** Councilor Martinez. **Nays:** President Aliff, Councilor Boston, Councilor Flores, Councilor Gomez, Councilor Latino, Councilor Maestri. Motion Failed 1-6.

Councilor Boston, seconded by Councilor Gomez, moved to approve the agenda as distributed.

Roll Call - **Ayes:** President Aliff, Councilor Boston, Councilor Flores, Councilor Gomez, Councilor Latino, Councilor Maestri. **Nays:** Councilor Martinez. Motion Passed 6-1.

## **J. READING AND APPROVAL OF MINUTES**

### **J1 CITY COUNCIL MINUTES 120825**

Councilor Boston, seconded by Councilor Gomez, moved to dispense with the reading and approve the Minutes of the Regular Meeting dated **December 08, 2025**, as distributed.

Roll Call - **Ayes:** President Aliff, Councilor Boston, Councilor Flores, Councilor Gomez, Councilor Latino, Councilor Maestri, Councilor Martinez. **Nays:** None. Motion Passed 7-0.

## **K. CONSENT AGENDA**

Deputy City Clerk Vincent Petkosek read the Consent Agenda into the record.

## **L. COMMUNICATIONS**

### **L1 P&Z NOVEMBER 12, 2025 MINUTES**

## **M. RESOLUTIONS**

### **M1 A RESOLUTION AWARDING A CONSTRUCTION CONTRACT IN THE AMOUNT OF \$269,373.60 TO DOUG VAUGHN, LLC FOR PROJECT NO. 25-111, CONCRETE IMPROVEMENTS - JONES AVENUE (PRAIRIE AVENUE TO LAKE AVENUE), SETTING FORTH \$40,000 FOR CONTINGENCIES, AND AUTHORIZING THE PURCHASING AGENT TO EXECUTE SAME**

This Resolution was assigned as 16194.

### **M2 A RESOLUTION ESTABLISHING PROJECT NO. AP2502 - HANGAR DOOR REPLACEMENT 522 SKYWAY, TRANSFERRING FUNDS IN THE AMOUNT OF \$197,582.00 FROM PROJECT NO. CI2426 - CITY COUNCIL AND DEPARTMENT RELOCATION PROJECT, AND BUDGETING AND APPROPRIATING SAID FUNDS INTO PROJECT NO. AP2502 HANGAR DOOR REPLACEMENT 522 SKYWAY**

This Resolution was assigned as 16195.

### **M3 A RESOLUTION SETTING FORTH \$70,000 FOR CONTINGENCIES PROJECT 25-066 REMODEL OF RIVERWALK BUILDING**

This Resolution was assigned as 16196.

### **M4 A RESOLUTION RATIFYING THE AWARD OF AN EMERGENCY CONSTRUCTION CONTRACT IN THE AMOUNT OF \$23,505.00 TO RUSS GRADING AND EXCAVATING LLC, A COLORADO LIMITED LIABILITY COMPANY, FOR PROJECT NO. 25-012 (SWAN03) — FOR EMERGENCY**

**STORM SEWER POINT REPAIR ON PUEBLO BOULEVARD AND ASTER STREET, APPROVING AMENDMENT NO. 1 TO THE CONTRACT IN THE AMOUNT OF \$55,034.56, APPROVING CHANGE ORDER NO. 1 IN THE AMOUNT OF \$1,570.79, AND AUTHORIZING AND APPROVING THE PURCHASING AGENT'S EXECUTION OF THE SAME**

This Resolution was assigned as 16197.

**M5 A RESOLUTION APPROVING AMENDMENT NO. 4 TO THE AGREEMENT FOR PROFESSIONAL ARCHITECTURAL SERVICES BETWEEN THE CITY OF PUEBLO, A COLORADO MUNICIPAL CORPORATION, AND DEMMON DESIGN SERVICES, INC, A REGISTERED COLORADO CORPORATION, AND AUTHORIZING THE PURCHASING AGENT TO EXECUTE SAME**

This Resolution was assigned as 16198.

**M6 A RESOLUTION APPROVING AND ACCEPTING THE CANVASS AND ABSTRACT OF VOTES CAST AT THE REGULAR MUNICIPAL ELECTION HELD ON NOVEMBER 4, 2025 AS PART OF A COORDINATED ELECTION WITH PUEBLO COUNTY**

This Resolution was assigned as 16199.

**M7 A RESOLUTION APPROVING AND ACCEPTING THE CANVASS AND ABSTRACT OF VOTES CAST AT THE SPECIAL MUNICIPAL ELECTION HELD ON MAY 6, 2025 AS PART OF A COORDINATED ELECTION WITH PUEBLO COUNTY**

This Resolution was assigned as 16200.

**M8 A RESOLUTION OPTING OUT OF HOUSE BILL 24-1363 CONCERNING MEASURES TO PROMOTE THE USE OF GRAYWATER**

This Resolution was assigned as 16201.

**M9 A RESOLUTION ESTABLISHING AN EXPEDITED REVIEW PROCESS FOR AFFORDABLE HOUSING PROJECTS**

This Resolution was assigned as 16202.

**M10 A RESOLUTION APPROVING THE PUEBLO URBAN RENEWAL AUTHORITY VENDOR FEE BUDGET FOR THE PUEBLO CONVENTION CENTER AND THE MEMORIAL HALL CAPITAL PROJECTS AND MAINTENANCE FUND, FOR THE CALENDAR YEAR 2025, COMMENCING JANUARY 1, 2026, AND ENDING THE LAST DAY OF DECEMBER 2026**

This Resolution was assigned as 16203.

**M11 A RESOLUTION ALLOWING THE SANGRE DE CRISTO ARTS AND CONFERENCE CENTER BOARD OF TRUSTEES TO REDUCE ITS NUMBER OF CITY APPOINTEES BEGINNING IN 2026 AND CONFIRMING THE REAPPOINTMENT BY THE MAYOR OF JUSTIN BOWEN TO SERVE A THREE-YEAR TERM EXPIRING DECEMBER 31, 2028, ON THE SANGRE DE CRISTO ARTS AND CONFERENCE CENTER BOARD OF TRUSTEES**

This Resolution was assigned as 16204.

**M12 A RESOLUTION CONFIRMING THE APPOINTMENT BY THE MAYOR OF GUY CHABOT AND CHRISTINA TRUJILLO TO SERVE A FOUR-YEAR TERM EXPIRING JANUARY 1, 2030, ON THE HISTORIC PRESERVATION COMMISSION**

This Resolution was assigned as 16205.

**M13 A RESOLUTION CONFIRMING THE APPOINTMENT BY THE MAYOR OF MARTINE ORR AND OLIVIA ST. ONGE TO COMPLETE A FOUR-YEAR TERM EXPIRING AUGUST 30, 2027, ON THE PUEBLO ADA ADVISORY COMMITTEE**

This Resolution was assigned as 16206.

**M14 A RESOLUTION CONFIRMING THE APPOINTMENT BY THE MAYOR OF RICK RINGLER AND STACEY QUEEN TO SERVE A THREE-YEAR TERM EXPIRING DECEMBER 31, 2028, AND BRANDON MARTINEZ AS A YOUTH MEMBER TO SERVE A ONE-YEAR TERM EXPIRING DECEMBER 31, 2026, ON THE HUMAN RELATIONS COMMISSION**

This Resolution was assigned as 16207.

**M15 A RESOLUTION CONFIRMING THE APPOINTMENT BY THE MAYOR OF BILL HICKMAN TO COMPLETE A THREE-YEAR TERM EXPIRING NOVEMBER 1, 2026 ON THE PUEBLO STREETSCAPE ADVISORY COMMITTEE**

This Resolution was assigned as 16208.

**M16 A RESOLUTION AUTHORIZING THE ISSUANCE OF A REVOCABLE PERMIT (REV-25-35) TO THE YMCA OF PUEBLO FOR THE USE OF ONE LANE OF SPAULDING AVENUE AND ONE LANE OF PARKER BOULEVARD FOR THEIR 2025 YMCA HOT CHOCOLATE 5K RUN/WALK AND THE 1K KIDS FUN RUN EVENT**

This Resolution was assigned as 16209.

**M17 A RESOLUTION AMENDING SECTION 2 OF RESOLUTION NO. 16175 TO CORRECT AN ERROR RELATED TO FUNDING FOR PROJECT NO. C12510 - CONVERGYS SITE REDEVELOPMENT**

This Resolution was assigned as 16210.

**N. ORDINANCES – FIRST PRESENTATION**

**N1 ORDINANCE APPROVING AND AUTHORIZING THE EXECUTION OF THE OPERATING AGREEMENT FEDERAL TRANSIT ADMINISTRATION CO-2025-020-00 OF FY2024 SECTION 5307 OPERATING GRANT, RELATING AWARD NO. CO-2025-020-00, BETWEEN THE CITY OF PUEBLO, A COLORADO MUNICIPAL CORPORATION, AND THE UNITED STATES OF AMERICA, DEPARTMENT OF TRANSPORTATION, FEDERAL TRANSIT ADMINISTRATION, IN THE AMOUNT OF \$3,181,584**

**N2 AN ORDINANCE APPROVING A MEMORANDUM OF UNDERSTANDING BETWEEN THE CITY OF PUEBLO, A COLORADO MUNICIPAL CORPORATION AND THE PUEBLO DEPARTMENT OF PUBLIC HEALTH AND**

**ENVIRONMENT RELATING TO ART INSTALLATIONS ON CITY OF PUEBLO  
BUS STOPS AND AUTHORIZING THE MAYOR TO EXECUTE SAME**

- N3 AN ORDINANCE APPROVING AN INTERGOVERNMENTAL AGREEMENT (IGA) BETWEEN THE CITY OF PUEBLO, A COLORADO MUNICIPAL CORPORATION, AND THE FEDERAL HIGHWAY ADMINISTRATION IN THE AMOUNT OF \$959,559, TRANSFERRING \$230,069.02 FROM HUAN01 TO PL2403, BUDGETING AND APPROPRIATING FUNDS IN THE AMOUNT OF \$1,189,628.02 AND AUTHORIZING THE MAYOR TO EXECUTE SAME**
- N4 AN ORDINANCE SUSPENDING THE PAYMENT OF THE MONTHLY STREET REPAIR UTILITY SERVICE CHARGES FOR TWELVE CONSECUTIVE MONTHS BEGINNING WITH EACH UTILITY CUSTOMER'S JANUARY 2026 UTILITY BILL**
- N5 AN ORDINANCE AMENDING ZONING RESTRICTIONS TO REZONE 300 W. ABRIENDO AVE. FROM R-5, MULTIPLE RESIDENTIAL AND OFFICE ZONE DISTRICT TO B-2, SUBREGIONAL BUSINESS ZONE DISTRICT**
- N6 AN ORDINANCE APPROVING THE MUNIZ SUNNY HEIGHTS SUBDIVISION FILING NO.1**
- N7 AN ORDINANCE APPROVING A GRANT AWARD AGREEMENT BETWEEN THE CITY OF PUEBLO, A COLORADO MUNICIPAL CORPORATION, AND THE STATE OF COLORADO, ACTING BY AND THROUGH THE COLORADO DEPARTMENT OF NATURAL RESOURCES, TO PROVIDE WILDLAND FIRE MITIGATION CREW TIME TO THE CITY, AND AUTHORIZING THE MAYOR TO EXECUTE THE SAME**
- N8 AN ORDINANCE APPROVING A MEMORANDUM OF UNDERSTANDING BETWEEN THE CITY OF PUEBLO, A COLORADO MUNICIPAL CORPORATION, AND VARIOUS COMMUNITY AGENCIES ESTABLISHING THE PUEBLO SEXUAL RESPONSE TEAM (SART) AND AUTHORIZING THE MAYOR TO EXECUTE SAME**
- N9 AN ORDINANCE TRANSFERRING \$1,721,401.66 FROM PROJECT CI2426 – CITY COUNCIL AND DEPARTMENT RELOCATION PROJECT TO PROJECT CI2524 – MEMORIAL AIRPORT RENOVATIONS PROJECT FOR THE RENOVATION, UPGRADE, AND EXPANSION OF THE PUEBLO MEMORIAL AIRPORT TERMINAL**
- N10 AN ORDINANCE TRANSFERRING \$4,288,640 FROM THE 1992-2026 SALES**

**AND USE TAX CAPITAL IMPROVEMENT PROJECTS FUND TO PROJECT ED2504 – MEMORIAL AIRPORT RENOVATIONS PROJECT TO FUND, IN PART, THE RENOVATION, UPGRADE, AND EXPANSION OF THE PUEBLO MEMORIAL AIRPORT TERMINAL**

**N11 AN ORDINANCE APPROVING AND ADOPTING A SUBSTANTIAL AMENDMENT TO THE CITY OF PUEBLO'S FIVE-YEAR 2025-2029 CONSOLIDATED PLAN AND THE 2025 ANNUAL ACTION PLAN FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) AND THE HOME INVESTMENT PARTNERSHIP ACT GRANT (HOME), AUTHORIZING THE MAYOR OF THE CITY OF PUEBLO TO SUBMIT THE SUBSTANTIAL AMENDMENT WITH ALL REQUIRED AND NECESSARY CERTIFICATIONS ASSURANCES, AND DOCUMENTATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, AND APPROPRIATING AND BUDGETING CDBG AND HOME FUNDS THEREFORE**

**N12 AN ORDINANCE APPROVING AND ADOPTING A SUBSTANTIAL AMENDMENT TO THE CITY OF PUEBLO'S 2024 ANNUAL ACTION PLAN FOR THE COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) AND THE HOME INVESTMENT PARTNERSHIP ACT GRANT (HOME), AUTHORIZING THE MAYOR OF THE CITY OF PUEBLO TO SUBMIT THE SUBSTANTIAL AMENDMENT WITH ALL REQUIRED AND NECESSARY CERTIFICATIONS, ASSURANCES, AND DOCUMENTATION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, AND APPROPRIATING AND BUDGETING CDBG AND HOME FUNDS THEREFORE**

**N13 AN ORDINANCE BUDGETING AND APPROPRIATING FUNDS IN THE AMOUNT OF \$5,000 FROM THE EL POMAR FOUNDATION INTO PROJECT NO. CI2520 - HEALTHY EATING KITCHEN PROGRAM AT THE EL CENTRO DEL QUINTO SOL COMMUNITY CENTER**

**N14 AN ORDINANCE APPROVING A LEASE BETWEEN THE CITY OF PUEBLO, A COLORADO MUNICIPAL CORPORATION AND IQOR US, INC., A DELAWARE CORPORATION FOR THE LEASE OF CITY OWNED PROPERTY LOCATED AT 317 NORTH MAIN STREET, PUEBLO, COLORADO 81003 AND AUTHORIZING THE MAYOR TO EXECUTE SAID LEASE**

**N15 AN ORDINANCE APPROVING A DEPOSIT AGREEMENT BETWEEN THE CITY OF PUEBLO, A COLORADO MUNICIPAL CORPORATION AND QQ OPERATING HOLDING COMPANY, LLC, A DELAWARE LIMITED LIABILITY COMPANY**

**N16 AN ORDINANCE APPROVING A CDOT ACCESS PERMIT AGREEMENT BETWEEN THE CITY OF PUEBLO, A MUNICIPAL CORPORATION, AND**

**MARTINEZ PROPERTY HOLDINGS, INC., A NEW MEXICO CORPORATION,  
AND AUTHORIZING THE MAYOR TO EXECUTE SAME**

**N17 AN ORDINANCE APPROVING AND ACCEPTING A SPECIAL WARRANTY DEED FROM NEIGHBORHOOD HOUSING SERVICES OF PUEBLO, INC., A COLORADO NONPROFIT CORPORATION, D/B/A NEIGHBORWORKS OF PUEBLO, N/K/A NEIGHBORWORKS SOUTHERN COLORADO, INC., A COLORADO NONPROFIT CORPORATION, FOR 1.75 ACRES OF LAND IN THE PIKES PEAK PARK, FILING NO. 1 SUBDIVISION**

**N18 AN ORDINANCE APPROVING, AND AUTHORIZING THE MAYOR TO EXECUTE A CONTRACT TO BUY AND SELL REAL ESTATE BY AND BETWEEN THE CITY OF PUEBLO, A COLORADO MUNICIPAL CORPORATION, AND STANLEY RIVERA AND ALVIN RIVERA PARTNERSHIP, FOR THE PURCHASE OF THE PROPERTY DESCRIBED AS 316-322 WEST NORTHERN AVENUE WITHIN THE CITY OF PUEBLO, AND BUDGETING AND APPROPRIATING FUNDS IN THE AMOUNT OF \$99,000 FROM PROJECT CI2113 – ARPA INTEREST FUNDS TO PROJECT CI2526 – 316-322 W NORTHERN PURCHASE FOR THE PURCHASE**

**O. APPROVAL OF CONSENT AGENDA**

Councilor Boston, seconded by Councilor Latino, moved to approve all Resolutions Set Forth in the Consent Agenda, Pass the Ordinances of the Consent Agenda, Setting the Public Hearings for January 12, 2026, and Order the Ordinances to be published BY TITLE.

Roll Call – **Ayes:** President Aliff, Councilor Boston, Councilor Flores, Councilor Gomez, Councilor Latino, Councilor Maestri, Councilor Martinez. **Nays:** None. Motion Passed 7-0.

**P. REGULAR AGENDA**

**Q. RESOLUTIONS**

**Q1 A RESOLUTION AWARDED A CONSTRUCTION CONTRACT IN THE AMOUNT OF \$557,222.00 TO MILLER PIPELINE LLC AND SETTING FORTH \$111,444.00 FOR CONTINGENCIES, FOR PROJECT NO. 25-107 (WWAN05) 2025 MANHOLE REHABILITATION PROJECT AND AUTHORIZING THE PURCHASING AGENT TO EXECUTE THE SAME**

A staff report and detailed review of the Resolution was given by Andra Ahrens, Director of Wastewater.

Elvis Martinez appeared by zoom and spoke in favor of this Resolution.

Councilor Boston, seconded by Councilor Latino, moved to approve the Resolution.

Roll Call - **Ayes:** President Aliff, Councilor Boston, Councilor Flores, Councilor Gomez, Councilor Latino, Councilor Maestri, Councilor Martinez. **Nays:** None. Motion Passed 7-0.

This Resolution was assigned as 16211.

**Q2 A RESOLUTION AUTHORIZING PAYMENT FROM THE COUNCIL CONTINGENCIES ACCOUNT IN THE 2025 GENERAL FUND BUDGET TO SOUTHERN COLORADO THEATRE COMPANY (DBA STEEL CITY THEATER COMPANY) IN THE AMOUNT OF \$2,000 TO SPONSOR THEIR PERFORMING ARTS ACADEMY**

A staff report and detailed review of the Resolution was given by Katie Hester, City Council Administrative Assistant.

Councilor Gomez, seconded by Councilor Latino, moved to approve the Resolution.

Roll Call - **Ayes:** President Aliff, Councilor Boston, Councilor Flores, Councilor Gomez, Councilor Latino, Councilor Maestri, Councilor Martinez. **Nays:** None. Motion Passed 7-0.

This Resolution was assigned as 16212.

**R. QUASI-JUDICIAL PROCEEDINGS**

**R1 AN ORDINANCE VACATING A 91,364 SQUARE FOOT DRAINAGE AND DETENTION EASEMENT LOCATED AT 4080 W. NORTHERN AVE. IN THE PUEBLO METRO-CENTER MALL SUBDIVISION, FILING NO 4, A SPECIAL AREA PLAN**

A staff report and detailed review of the Ordinance was given by Beritt Odom, Director of Planning & Community Development. Ms. Odom requested that the Planning & Zoning documents for this item, Case # V25-05 dated November 12, 2025, be made part of the record for this hearing. So ordered by President Aliff.

**PUBLIC HEARING:**

Seeing no one wished to speak, President Aliff declared the hearing closed.

Councilor Latino, seconded by Councilor Flores, moved to approve the Ordinance on final presentation.

Roll Call - **Ayes:** President Aliff, Councilor Boston, Councilor Flores, Councilor Gomez, Councilor Latino, Councilor Maestri, Councilor Martinez. **Nays:** None. Motion Passed 7-0.

This Ordinance was assigned as 11090.

**S. ORDINANCES – FINAL PRESENTATION**

**S1 AN ORDINANCE ESTABLISHING THE FISCAL YEAR (FY) 2026-2027 PUEBLO URBAN TRANSPORTATION PLANNING PROJECT AND BUDGETING AND APPROPRIATING FUNDS IN THE AMOUNT OF \$759,163.14 IN 2026 FOR SAID PROJECT**

A staff report and detailed review of the Ordinance was given by Eva Cosyleon, HPO Manager.

**PUBLIC HEARING:**

Seeing no one wished to speak, President Aliff declared the hearing closed.

Councilor Gomez, seconded by Councilor Flores, moved to approve the Ordinance on final presentation.

Roll Call - **Ayes:** President Aliff, Councilor Boston, Councilor Flores, Councilor Gomez, Councilor Latino, Councilor Maestri, Councilor Martinez. **Nays:** None. Motion Passed 7-0.

This Ordinance was assigned as **11091.**

**S2 AN ORDINANCE APPROVING A DELEGATION AGREEMENT BETWEEN THE CITY OF PUEBLO, A COLORADO MUNICIPAL CORPORATION, AND THE PUEBLO AREA COUNCIL OF GOVERNMENTS (PACOG) FOR 2026 TRANSPORTATION PLANNING SERVICES AND AUTHORIZING THE MAYOR TO EXECUTE SAME**

A staff report and detailed review of the Ordinance was given by Eva Cosyleon, HPO Manager.

**PUBLIC HEARING:**

Seeing no one wished to speak, President Aliff declared the hearing closed.

Councilor Latino, seconded by Councilor Gomez, moved to approve the Ordinance on final presentation.

Roll Call - **Ayes:** President Aliff, Councilor Boston, Councilor Flores, Councilor Gomez, Councilor Latino, Councilor Maestri, Councilor Martinez. **Nays:** None. Motion Passed 7-0.

This Ordinance was assigned as **11092.**

**S3 AN ORDINANCE DESIGNATING 330 SOUTH CITY PARK AVENUE, CITY PARK BATHHOUSE, AS A LOCAL HISTORIC LANDMARK**

A staff report and detailed review of the Ordinance was given by Beritt Odom, Director of Planning & Community Development. Ms. Odom requested that the Planning & Zoning documents for this item, Case #PZHPC-25-09 dated, November 12, 2025, be made part of the record for this hearing. So ordered by President Aliff.

**PUBLIC HEARING:**

George Koncojia appeared in person and spoke in favor of this Ordinance.  
Brett Verna appeared in person and spoke in favor of this Ordinance.  
Ms. Bartolo appeared in person and spoke in favor of this Ordinance.  
Laura Campbell appeared in person and spoke in favor of this Ordinance.  
Elvis Martinez appeared by zoom and spoke in favor of this Ordinance.

Seeing no one else wishing to speak, President Aliff declared the hearing closed.

Councilor Flores, seconded by Councilor Gomez, moved to approve the Ordinance on final presentation.

Roll Call - **Ayes:** President Aliff, Councilor Boston, Councilor Flores, Councilor Gomez, Councilor Latino, Councilor Maestri. **Nays:** Councilor Martinez. Motion Passed 6-1.

This Ordinance was assigned as **11093.**

**S4 AN ORDINANCE APPROVING A SETTLEMENT AGREEMENT BETWEEN THE CITY OF PUEBLO, A COLORADO MUNICIPAL CORPORATION AND PUEBLO COUNTY, A POLITICAL SUBDIVISION OF THE STATE OF COLORADO FOR**

## **THE TERMINATION AND DISSOLUTION OF THE PUEBLO REGIONAL BUILDING DEPARTMENT**

A staff report and detailed review of the Ordinance was given by Carla Sikes, City Attorney.

### **PUBLIC HEARING:**

Seeing no one wished to speak, President Aliff declared the hearing closed.

Councilor Latino, seconded by Councilor Boston, moved to approve the Ordinance on final presentation.

Roll Call - **Ayes:** President Aliff, Councilor Boston, Councilor Flores, Councilor Gomez, Councilor Latino, Councilor Maestri, Councilor Martinez. **Nays:** None. Motion Passed 7-0.

This Ordinance was assigned as **11094**.

### **T. ADJOURN**

President Aliff adjourned the meeting at 9:17 p.m.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "V. R. P.", is written above the printed name.

Vincent Petkosek  
Deputy City Clerk

## REVOCABLE PERMIT

Pursuant to the authority granted by Section 16-9 of the Charter of Pueblo, a Municipal Corporation, (the "City"), the City Council of City hereby grants the following revocable permit to Permittee subject to and conditioned upon the provisions herein contained and the Permittee's compliance therewith:

1. Name, Address and Telephone Number of Permittee: **YMCA of Pueblo 3200 E Spaulding Ave 7195435151**
2. Permitted Area: **To close one lane of Spaulding Avenue and one lane of Parker Boulevard**
3. Purpose of Revocable Permit: **Closure of the permitted area to vehicular traffic to facilitate the 2025 Hot Chocolate 5K Run/Walk and the 1K Kids Fun Run**
4. Commencement Date: **December 27, 2025** Time: **7:00 AM**
5. Ending Date: **December 27, 2025** Time: **11:00am**

PERMITTEE IN CONSIDERATION OF THE ISSUANCE AND GRANTING OF THE ABOVE DESCRIBED REVOCABLE PERMIT (THE "PERMIT") REPRESENTS, WARRANTS AND AGREES:

(a) The Permitted Area shall be used for the above-specified Purpose of Revocable Permit. No use of the Permitted Area shall be made before the time of the Commencement Date.

(b) All structures, fences, tables, chairs, equipment or other improvements authorized to be placed in the Permitted Area by Permittee (the "Improvements") shall be constructed, installed, and maintained by Permittee in compliance with all applicable codes, ordinances, rules and regulations of City and this Permit.

(c) If the Revocable Permit is issued for a sidewalk café, the Permittee and sidewalk café shall be subject to all the provisions, conditions and requirements contained in section 9-10-84 of the Pueblo Municipal Code, or as same may be amended, which are incorporated herein by reference. In addition, no Improvement shall be tied-down or chained to any tree within or adjacent to the Permitted Area nor shall any Improvement be installed or located in such a manner as to hinder or interfere with the opening of motor vehicle doors or passenger movement to and from motor vehicles parked adjacent to or near the Permitted Area.

(d) If this Permit is issued for the use of the public right-of-way for a special event, Permittee shall deposit with the City the sum of \$500.00 ("Deposit"). The Deposit will be forfeited to the City if Permittee does not remove all Permittee's equipment and property from, and clean and restore the Permitted Area to its original condition before the Time of the Ending Date. If so timely removed and cleaned, the Deposit will be returned to Permittee.

(e) Before the Time of the Ending Date, or immediately upon any other termination of this Permit, Permittee shall, at Permittee's expense, remove all of Permittee's Improvements from the Permitted Area and clean and restore the Permitted Area to its original condition. Failure to timely remove all of Permittee's Improvements from the Permitted Area and clean and restore the Permitted Area to its original condition shall constitute Permittee's abandonment of the Permittee's Improvements, and City may, at Permittee's expense, remove and dispose of Permittee's Improvements and clean and restore the Permitted Area to its original condition. Permittee agrees to pay all City's costs and expenses, including reasonable attorney fees, incurred in the enforcement of this Permit.

(f) Permittee shall keep all Improvements and Permitted Area in good, clean and safe condition and repair, free from litter, waste and debris.

(g) Permittee shall indemnify, defend and hold City, its officers, agents and employees harmless from and against any and all suits, claims, liabilities, loss, damages and expenses, including reasonable attorney fees and cost of defense, arising, directly or indirectly, from or caused by the issuance of this Permit or the conditions hereof, or the existence, construction, installation, repair or maintenance of the Improvements in the Permitted Area, or the use of the Permitted Area or Improvements by Permittee, its officers, agents, employees, invitees or general public.

(h) Neither this Permit nor any of the privileges granted to Permittee hereby, may be conveyed, assigned, transferred or sublet by Permittee without the prior written consent of the City Council of City. Any attempted conveyance, assignment, transfer or subletting of the Permit or Permitted Area without the written consent of the City Council of Pueblo shall be void and of no effect and shall cause this Permit to be automatically revoked.

(i) Permittee shall keep and maintain commercial general liability insurance covering the Permitted Area and Improvements in amounts not less than \$1,000,000.00 combined single limits per occurrence and aggregate, naming the City as an additional insured and contain a waiver of rights of subrogation against City. A certificate for such insurance and each renewal thereof shall be delivered to the City. Failure to maintain such insurance shall cause this Permit to be automatically revoked.

(j) Trees, landscaping and shrubbery within or adjacent to the Permitted Area shall be protected from damage or injury by Permittee and shall not be removed except after receipt by the Permittee of the written consent of the City's Director of Parks and Recreation. Covid-19

(k) Any notice or other document required or permitted herein shall be in writing and delivered personally or by first class mail, postage prepaid, as follows:

(i) If to Permittee, at the address shown in paragraph 1 above.

(ii) If to City, 1 City Hall Place, Pueblo, Colorado, 81003, Attention: Revocable Permit Review Committee. Each party reserves the right to change its address provided notice of such change is given in accordance with this paragraph (k).

(l) City reserves and is hereby granted by Permittee access to, under and through the Permitted Area for any and all purposes. City may injure, damage or remove any and all Permittee's Improvements in the Permitted Area in exercising the right of access hereby reserved and granted. Permittee assumes the risk of injury, loss and damage to Permittee's Improvements within the Permitted area, and City shall have no responsibility or liability for any damage or injuries thereto, whatsoever the cause, including, but not limited to, the acts or omissions of City, its officers, employees, or agents.

(m) This Permit shall terminate upon the occurrence of any one of the following events: (i) the Time of the Ending Date, (ii) abandonment or nonuse by Permittee for a period of three (3) consecutive months, (iii) surrender or cancellation of the Permit in writing by Permittee, (iv) automatic revocation as provided in paragraphs (h) and (i) above; (v) revocation or termination of this Permit by resolution of the City Council of City; or (vi) revocation by the Mayor as provided in paragraph (p). The termination of this Permit shall not relieve Permittee from Permittee's obligations under paragraph (f) until the Authorized Improvements have been removed by Permittee in compliance with paragraph (e).

(n) Permittee acknowledges and agrees that this Permit is temporary and subject to revocation or termination by resolution of the City Council of City, in its sole discretion, for any reason or no reason, at anytime, without liability to City, and without notice to or hearing by Permittee. Permittee waives any and all right or claim to such notice, hearing, and liability of the City.

(o) Permittee acknowledges and agree that use of the Permitted Area shall be conducted in compliance with applicable laws and regulations including but not limited orders, regulations and directives issued by the Governor, Colorado Department of Public Health and Environment and the Pueblo County Department of Public Health and Environment with respect to COVID-19 ("COVID-19 Regulations"). Seven days prior to Commencement Date, Permittee shall submit in writing to the Revocable Permit Review Committee those actions Permittee shall take to assure protection of the public health and compliance with COVID-19 Regulations.

(p) Permittee further acknowledges and agrees that this Permit is temporary and subject to revocation or termination if the purpose of the permit or any potential activities to be conducted under the Permit is determined by the Mayor of City, in his sole and absolute discretion, to not be in furtherance of and/or contrary to the public health or welfare due to COVID-19 or related issues. Such determination and termination may be issued at any time, without liability to City, and without notice to or hearing by Permittee. Permittee waives any and all right or claim to such notice, hearing, and liability of the City.

(q) Nothing in this Permit shall be interpreted to limit or prevent the protections afforded to City under the Colorado Governmental Immunity Act, C.R.S. § 24-10-101, et seq.

Signed in Pueblo, Colorado this 12<sup>th</sup> day of December, 2025.

**PERMITTEE:**

Organization or

Individual:

By:

Title:

YMCA of Pueblo

Senior Program Director

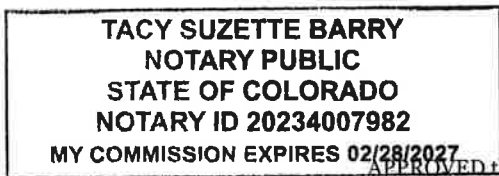
Dirk Hodge

STATE OF COLORADO )

COUNTY OF PUEBLO ) SS..

The foregoing instrument was acknowledged before me the 12<sup>th</sup> day of December, 2025 by Dirk Hodge as Senior Program Director.

My commission expires: \_\_\_\_\_.



Tacy Suzette Barry  
Notary Public

APPROVED this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.  
PUEBLO, a Municipal Corporation

By \_\_\_\_\_

Heather Graham, Mayor

## Executive Summary

### ES-05 Executive Summary – 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

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

As a CDBG Program HUD entitlement community, the City is required to prepare a Five-Year Consolidated Plan (CP) in order to implement any federal programs that fund housing, community development, and economic development within the community. This CP covers the period from FY 2025 through FY 2029 and will be submitted to HUD for approval.

The purpose of the CP is to guide federal funding decisions in the next five years. The CP is guided by three overarching goals that are applied according to a community's needs. The goals are:

1. To provide decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing.
2. To provide a suitable living environment through increased housing opportunities and reinvestment in deteriorating communities.
3. To expand economic opportunities through developing housing options that are more closely connected to jobs and services, development activities that promote long-term community viability, and the empowerment of low- and moderate- income persons to achieve self-sufficiency.

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

The City of Pueblo anticipates receiving the following federal resources in FY 2025; estimated projections for five years follow in parentheses:

- CDBG \$1,432,469 million (\$7,162,345)
- HOME \$877,545.14 (\$4,387,725.70)

## **2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview**

The Strategic Plan provides a framework to address the needs of the City for the next five years using CDBG and HOME funds. The three overarching objectives guiding the proposed activities are:

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

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

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

All future activities funded in the next five years will support at least one objective and one outcome. The identified priorities include:

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

## **3. Evaluation of past performance**

The following evaluation of past performance is from the FY2019 Consolidated Annual Performance and Evaluation Report (CAPER). The accomplishments that follow are those achieved through the expenditure of CDBG and HOME funds:

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

members. Based on the PR-26 Report, \$1,137,084.21 (93.7%) of the funds drawn benefited low and moderate-income households and neighborhoods.

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

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

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

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

normally receives directly to the grantees. This funding leveraged \$54 million in other federal, state and private funding.

#### **4. Summary of citizen participation process and consultation process**

The City of Pueblo's Department of Housing and Citizen Services developed an outreach effort to maximize input from a large cross-section of stakeholders. This outreach effort included an online survey, two in-person public meetings with virtual attendance available, and stakeholder input.

The outreach process highlighted several key issues within the community including the need for quality, affordable housing, accessible housing, and housing and services for those experiencing homelessness. A complete summary of Citizen Participation, including comments, is included in the Citizen Participation Appendix.

#### **5. Summary of public comments**

Please see the Participation Appendix.

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

All comments were accepted.

#### **7. Summary**

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

## The Process

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

#### 1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source

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

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

Table 1 – Responsible Agencies

#### Narrative

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

#### Consolidated Plan Public Contact Information

Melissa Cook, Housing Administrator

City of Pueblo Department of Housing and Citizen Services

2631 E. 4 Street

Pueblo, CO. 81001

Phone: 719-553-2850

Email: [housing@pueblo.us](mailto:housing@pueblo.us)

## **PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)**

### **1. Introduction**

The City of Pueblo's Department of Housing and Citizen Services developed an outreach effort to maximize input from a large cross-section of stakeholders.

This outreach effort included public meetings, published meeting notices, and stakeholder/focus group communications meant to engage a broad variety of stakeholders and City residents consistent with the Citizen Participation Plan, included in Grantee's Participation Appendix.

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

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

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

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

The Colorado Balance of State Continuum of Care (BoS CoC) is represented locally by the various housing and service providers working to meet the needs of persons experiencing homelessness while also working to end homelessness. The City is in frequent communication with housing and service providers.

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

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

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

|   |                                                                                                                                                      |                                                                                                                                                                                                                                                          |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <b>Agency/Group/Organization</b>                                                                                                                     | Health Solutions                                                                                                                                                                                                                                         |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                | Services-Persons with HIV/AIDS<br>Services-Health<br>Services - Victims<br>Health Agency                                                                                                                                                                 |
|   | <b>What section of the Plan was addressed by Consultation?</b>                                                                                       | Non-Homeless Special Needs<br>Economic Development                                                                                                                                                                                                       |
|   | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The agency provided input. Health Solutions attended one of the outreach sessions, and was asked to provide information via email and through a survey.                                                                                                  |
| 3 | <b>Agency/Group/Organization</b>                                                                                                                     | HABITAT FOR HUMANITY OF PUEBLO, INC.                                                                                                                                                                                                                     |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                | Housing                                                                                                                                                                                                                                                  |
|   | <b>What section of the Plan was addressed by Consultation?</b>                                                                                       | Housing Need Assessment<br>Economic Development                                                                                                                                                                                                          |
|   | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The agency provided input by attending an in-person meeting.                                                                                                                                                                                             |
| 6 | <b>Agency/Group/Organization</b>                                                                                                                     | United Way of Pueblo County                                                                                                                                                                                                                              |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                | Services-Children<br>Services-Employment<br>Services - Broadband Internet Service Providers<br>Services - Narrowing the Digital Divide                                                                                                                   |
|   | <b>What section of the Plan was addressed by Consultation?</b>                                                                                       | Housing Need Assessment<br>Economic Development                                                                                                                                                                                                          |
|   | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The agency provided input. This agency was consulted regarding broadband internet service because they partner with Comcast's Internet Essentials program, which is a low-moderate income program allowing access to high-speed internet for \$10/month. |
| 7 | <b>Agency/Group/Organization</b>                                                                                                                     | Archway Housing & Services                                                                                                                                                                                                                               |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                | Housing<br>Services - Housing                                                                                                                                                                                                                            |

|    |                                                                                                                                                      |                                                                                                                                                                       |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | <b>What section of the Plan was addressed by Consultation?</b>                                                                                       | Housing Need Assessment<br>Homelessness Strategy<br>Economic Development                                                                                              |
|    | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The agency was asked to provided input, and provided this input via email.                                                                                            |
| 8  | <b>Agency/Group/Organization</b>                                                                                                                     | Citizens Advisory Council                                                                                                                                             |
|    | <b>Agency/Group/Organization Type</b>                                                                                                                | Business and Civic Leaders                                                                                                                                            |
|    | <b>What section of the Plan was addressed by Consultation?</b>                                                                                       | Housing Need Assessment<br>Homelessness Strategy                                                                                                                      |
|    | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> |                                                                                                                                                                       |
| 9  | <b>Agency/Group/Organization</b>                                                                                                                     | City of Pueblo                                                                                                                                                        |
|    | <b>Agency/Group/Organization Type</b>                                                                                                                | Agency - Managing Flood Prone Areas<br>Agency - Management of Public Land or Water Resources<br>Agency - Emergency Management                                         |
|    | <b>What section of the Plan was addressed by Consultation?</b>                                                                                       | Economic Development                                                                                                                                                  |
|    | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Several City employees provided input via email and during a series of outreach sessions.                                                                             |
| 10 | <b>Agency/Group/Organization</b>                                                                                                                     | T-Mobile Fiber                                                                                                                                                        |
|    | <b>Agency/Group/Organization Type</b>                                                                                                                | Services - Broadband Internet Service Providers<br>Services - Narrowing the Digital Divide                                                                            |
|    | <b>What section of the Plan was addressed by Consultation?</b>                                                                                       | Economic Development<br>Anti-poverty Strategy                                                                                                                         |
|    | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | T-Mobile Fiber recently came in to the Pueblo area. They were invited to attend one of two in-person outreach events to provide feedback but did not provide feedback |

|    |                                                                                                                                                      |                                                                                                                                                                                               |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 14 | <b>Agency/Group/Organization</b>                                                                                                                     | Pueblo Community Health Center                                                                                                                                                                |
|    | <b>Agency/Group/Organization Type</b>                                                                                                                | Services-Health                                                                                                                                                                               |
|    | <b>What section of the Plan was addressed by Consultation?</b>                                                                                       | Lead-based Paint Strategy<br>Homelessness Strategy<br>Anti-poverty Strategy                                                                                                                   |
|    | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The agency provided input by attending one of the in-person outreach sessions.                                                                                                                |
| 15 | <b>Agency/Group/Organization</b>                                                                                                                     | Pueblo Urban Renewal Authority                                                                                                                                                                |
|    | <b>Agency/Group/Organization Type</b>                                                                                                                | Services - Housing<br>Service-Fair Housing                                                                                                                                                    |
|    | <b>What section of the Plan was addressed by Consultation?</b>                                                                                       | Housing Need Assessment<br>Non-Homeless Special Needs<br>Economic Development<br>Market Analysis                                                                                              |
|    | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The agency provided input.                                                                                                                                                                    |
| 17 | <b>Agency/Group/Organization</b>                                                                                                                     | POSADA, INC                                                                                                                                                                                   |
|    | <b>Agency/Group/Organization Type</b>                                                                                                                | Services - Housing<br>Services-homeless<br>Service-Fair Housing                                                                                                                               |
|    | <b>What section of the Plan was addressed by Consultation?</b>                                                                                       | Housing Need Assessment<br>Homelessness Strategy<br>Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Economic Development |
|    | <b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The agency provided input by attending one of the in-person outreach sessions.                                                                                                                |

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

Internet - both Comcast and T-Mobile Fiber were invited to attend one of two in-person outreach events to provide feedback but did not provide feedback.

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

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

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))

The City will continue to interact with public entities at all levels to ensure coordination and cooperation in the implementation of the Consolidated Plan and thereby maximize the benefits of the City’s housing and community development activities for the residents being served. Specifically, the City meets regularly with Pueblo County’s Department of Housing and Human Services and attends monthly meetings of the CoC to coordinate planning and development of solutions for homelessness and issues related to fair housing. The City communicated with adjacent units of government that the Consolidated Plan was available for review. Additionally, the City and County held joint public meetings to gather input from the public and stakeholders. On May 31, 2025, an email was sent to 136 key stakeholders, including planning professionals at the City, County, and other public entities requesting feedback.

Narrative

## **PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The City engaged in numerous activities to engage citizen participation in the formation of the Consolidated Plan, including public in-person meetings and online surveys to gather input.

The City informed the public of the public meetings and survey through posting notices on events pages and websites; posting on 17 Facebook pages whose topics focused on City and civic issues; posting paper flyers at a variety of well-trafficked public locations; and distributing electronic flyers via email to a variety of civic, nonprofit and business groups and boards.

A variety of stakeholders from organizations related to public health, housing, community development, and civic issues were individually invited to provide specific input.

Citizen input also includes a 30-day display period of the draft document with an invitation for citizen feedback, followed by a second public hearing. Feedback received from stakeholders and the public helped shape the priority needs identified in the plan.

### Citizen Participation Outreach

| Sort Order | Mode of Outreach  | Target of Outreach                                                                                                              | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------|------------------------------|----------------------------------------------|---------------------|
| 1          | Internet Outreach | Minorities<br><br>Persons with disabilities<br><br>Non-targeted/broad community<br><br>Residents of Public and Assisted Housing | See Participation Appendix     | NA                           | NA                                           |                     |
| 2          | Stakeholder input | Minorities<br><br>Non-targeted/broad community                                                                                  | See Participation Appendix     | NA                           | NA                                           |                     |

| Sort Order | Mode of Outreach  | Target of Outreach                                                                                 | Summary of response/attendance                                                                                                                                                             | Summary of comments received    | Summary of comments not accepted and reasons | URL (If applicable)                                                                   |
|------------|-------------------|----------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|----------------------------------------------|---------------------------------------------------------------------------------------|
| 3          | Stakeholder input | Persons with disabilities<br><br>Non-targeted/broad community<br><br>Housing and Service Providers | See Participation Appendix                                                                                                                                                                 | See Participation Appendix      | All comments were accepted.                  | <a href="http://pueblo.zoom.us/j/98351581834">http://pueblo.zoom.us/j/98351581834</a> |
| 4          | Public Meeting    | Housing and Service Providers                                                                      | March 18 and March 19 in the evenings at two separate public libraries, respectively. Total in-person attendance across the two meetings was 32 people, with additional attendees via Zoom | See Participation Appendix      | All comments were accepted.                  | <a href="http://pueblo.zoom.us/j/92754723460">http://pueblo.zoom.us/j/92754723460</a> |
| 5          | Stakeholder input | Non-targeted/broad community                                                                       | Total survey responses: 89                                                                                                                                                                 | See appendix for survey results | All comments were accepted                   |                                                                                       |

| Sort Order | Mode of Outreach  | Target of Outreach           | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|-------------------|------------------------------|--------------------------------|------------------------------|----------------------------------------------|---------------------|
| 8          | Newspaper Ad      | Non-targeted/broad community | NA                             | NA                           | NA                                           |                     |
| 9          | Stakeholder input | Non-targeted/broad community | No comments received           | No comment received          | NA (No comments received)                    |                     |

**Table 4 – Citizen Participation Outreach**

## Needs Assessment

### NA-05 Overview

#### Needs Assessment Overview

The needs assessment is based on an analysis of housing problems across the City of Pueblo by income level among renters, owners, and households with special needs. Additionally, needs were identified through a public outreach process that included stakeholder consultations, public meetings, an online resident survey, and a review process designed to meaningfully engage citizens.

Data in this section was drawn primarily from HUD's Comprehensive Housing Affordability Strategy (CHAS) data set, which is a special tabulation of 2011-2020 American Community Survey (ACS) data from the Census Bureau. The CHAS data describes housing problems, such as overcrowding or incomplete kitchen and/or plumbing facilities, as well as cost burden, which occurs when a household pays more than 30% of its gross income on housing costs. Severe cost burden occurs when a household pays more than 50% of its gross income on housing costs.

Supplemental data were drawn from the 2020-2024 ACS 5-Year Estimates and other sources to provide additional context when needed.

## NA-10 Housing Needs Assessment - 24 CFR 91.405, 24 CFR 91.205 (a,b,c)

### Summary of Housing Needs

According to American Community Survey data (2019-2023), median household income in the city of Pueblo was \$55,305 in 2023. Just over 60% of the city's population lives in owner-occupied housing, and the median value of owner-occupied housing units for that time period was \$230,900, with the median mortgage-owner paying \$1,380 per month for housing expenses. Median gross rent (rent plus other contracted expenses such as utilities) was \$1,020.

In Pueblo County, median household income was \$62,250. Rates of owner-occupied housing were higher (68.3%). Median owner-occupied home values were \$271,800, with the median mortgage-owner paying \$1,544 per month. Median gross rent in the county was \$1,059.

As the data below shows, the most significant housing issues identified are cost burden and severe cost burden. By HUD definitions, "cost burdened" means a household spends more than 30% of income on housing expenses, while "severely cost burdened" households spend more than 50% of income on housing expenses. According to Comprehensive Housing Affordability Strategy (CHAS) data, 14.2% of City households are cost burdened and 13.1% are severely cost burdened. Given a lack of decent, affordable housing options, the area's lower-income households often face a choice between deficient, substandard housing and cost burden. High housing costs reduce economic opportunities and access to prosperity, especially among lower-income households.

Out of total city households, 15.8 percent have one or more severe housing problems (substandard housing, severe overcrowding, severe cost burden). The data indicates 510 renters and 151 homeowners lack complete plumbing or kitchen facilities, supporting the concerns from stakeholders and citizens about local housing suffering from neglect or age.

Of all cost-burdened households, the largest groups were in the 0-30% AMI bracket: small related renter households (20%), elderly renters (14.2%), and elderly homeowners (17.7%). Among all severely cost-burdened households, renters in the 30-50% AMI group made up 21.5% of the total, while elderly homeowners in the 0-30% AMI bracket were also overrepresented, at 12.8% of all severely cost-burdened households. These numbers indicate a strong need for additional assistance for elderly residents, as well as more affordable options for lower-income renters of all types.

The below tables are HUD-generated tables using 2009-2020 CHAS data that are part of the Consolidated Plan tool. These tables are automatically generated when creating the Consolidated Plan. HAMFI refers to "HUD Adjusted Median Family Income," which is the median family income calculated by HUD for each jurisdiction in order to determine Fair Market Rents and income limits for HUD programs. HAMFI will not necessarily be the same as other calculations of median incomes such as a simple Census number due to a series of adjustments that are made. Where the HUD tables below report AMI (Area Median Income), they refer to HAMFI.

Wherever automatically generated CHAS data is not available, supplemental information such as American Community Survey (ACS) data will be used.

| Demographics  | Base Year: 2009 | Most Recent Year: 2020 | % Change |
|---------------|-----------------|------------------------|----------|
| Population    | 160,965         | 166,940                | 4%       |
| Households    | 62,675          | 64,935                 | 4%       |
| Median Income | \$0.00          | \$0.00                 |          |

**Table 5 - Housing Needs Assessment Demographics**

**Data Source:** 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

#### Number of Households Table

|                                                             | 0-30%<br>HAMFI | >30-50%<br>HAMFI | >50-80%<br>HAMFI | >80-100%<br>HAMFI | >100%<br>HAMFI |
|-------------------------------------------------------------|----------------|------------------|------------------|-------------------|----------------|
| Total Households                                            | 11,275         | 8,730            | 12,364           | 6,884             | 25,675         |
| Small Family Households                                     | 3,269          | 2,684            | 3,764            | 2,509             | 12,270         |
| Large Family Households                                     | 404            | 564              | 1,124            | 519               | 2,350          |
| Household contains at least one person 62-74 years of age   | 2,551          | 2,159            | 3,332            | 1,868             | 6,900          |
| Household contains at least one person age 75 or older      | 2,044          | 1,939            | 1,939            | 1,049             | 2,173          |
| Households with one or more children 6 years old or younger | 1,528          | 1,294            | 2,063            | 941               | 2,037          |

**Table 6 - Total Households Table**

**Data Source:** 2016-2020 CHAS

## Housing Needs Summary Tables

### 1. Housing Problems (Households with one of the listed needs)

|                                                                                       | Renter    |             |             |              |       | Owner     |             |             |              |       |
|---------------------------------------------------------------------------------------|-----------|-------------|-------------|--------------|-------|-----------|-------------|-------------|--------------|-------|
|                                                                                       | 0-30% AMI | >30-50% AMI | >50-80% AMI | >80-100% AMI | Total | 0-30% AMI | >30-50% AMI | >50-80% AMI | >80-100% AMI | Total |
| NUMBER OF HOUSEHOLDS                                                                  |           |             |             |              |       |           |             |             |              |       |
| Substandard Housing - Lacking complete plumbing or kitchen facilities                 | 295       | 85          | 90          | 40           | 510   | 29        | 90          | 28          | 4            | 151   |
| Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing) | 40        | 35          | 40          | 25           | 140   | 0         | 10          | 49          | 0            | 59    |
| Overcrowded - With 1.01-1.5 people per room (and none of the above problems)          | 155       | 140         | 154         | 60           | 509   | 34        | 40          | 224         | 54           | 352   |
| Housing cost burden greater than 50% of income (and none of the above problems)       | 4,099     | 919         | 224         | 0            | 5,242 | 2,029     | 1,000       | 244         | 18           | 3,291 |

|                                                                                 | Renter       |                    |                    |                     |       | Owner        |                    |                    |                     |       |
|---------------------------------------------------------------------------------|--------------|--------------------|--------------------|---------------------|-------|--------------|--------------------|--------------------|---------------------|-------|
|                                                                                 | 0-30%<br>AMI | >30-<br>50%<br>AMI | >50-<br>80%<br>AMI | >80-<br>100%<br>AMI | Total | 0-30%<br>AMI | >30-<br>50%<br>AMI | >50-<br>80%<br>AMI | >80-<br>100%<br>AMI | Total |
| Housing cost burden greater than 30% of income (and none of the above problems) | 730          | 2,085              | 1,444              | 315                 | 4,574 | 708          | 1,150              | 2,065              | 730                 | 4,653 |
| Zero/negative Income (and none of the above problems)                           | 605          | 0                  | 0                  | 0                   | 605   | 363          | 0                  | 0                  | 0                   | 363   |

**Table 7 – Housing Problems Table**

Data Source: 2016-2020 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

|                                                                       | Renter       |                    |                    |                     |        | Owner        |                    |                    |                     |        |
|-----------------------------------------------------------------------|--------------|--------------------|--------------------|---------------------|--------|--------------|--------------------|--------------------|---------------------|--------|
|                                                                       | 0-30%<br>AMI | >30-<br>50%<br>AMI | >50-<br>80%<br>AMI | >80-<br>100%<br>AMI | Total  | 0-30%<br>AMI | >30-<br>50%<br>AMI | >50-<br>80%<br>AMI | >80-<br>100%<br>AMI | Total  |
| NUMBER OF HOUSEHOLDS                                                  |              |                    |                    |                     |        |              |                    |                    |                     |        |
| Having 1 or more of four housing problems                             | 4,589        | 1,179              | 510                | 125                 | 6,403  | 2,094        | 1,140              | 559                | 78                  | 3,871  |
| Having none of four housing problems                                  | 2,699        | 3,158              | 4,159              | 1,875               | 11,891 | 1,909        | 3,245              | 7,129              | 4,804               | 17,087 |
| Household has negative income, but none of the other housing problems | 0            | 0                  | 0                  | 0                   | 0      | 0            | 0                  | 0                  | 0                   | 0      |

**Table 8 – Housing Problems 2**

Data Source: 2016-2020 CHAS

### 3. Cost Burden > 30%

|                      | Renter       |                |                |        | Owner        |                |                |       |
|----------------------|--------------|----------------|----------------|--------|--------------|----------------|----------------|-------|
|                      | 0-30%<br>AMI | >30-50%<br>AMI | >50-80%<br>AMI | Total  | 0-30%<br>AMI | >30-50%<br>AMI | >50-80%<br>AMI | Total |
| NUMBER OF HOUSEHOLDS |              |                |                |        |              |                |                |       |
| Small Related        | 1,919        | 1,035          | 689            | 3,643  | 644          | 824            | 595            | 2,063 |
| Large Related        | 288          | 285            | 45             | 618    | 49           | 84             | 204            | 337   |
| Elderly              | 1,309        | 755            | 463            | 2,527  | 1,629        | 940            | 941            | 3,510 |
| Other                | 1,760        | 1,139          | 560            | 3,459  | 458          | 323            | 604            | 1,385 |
| Total need by income | 5,276        | 3,214          | 1,757          | 10,247 | 2,780        | 2,171          | 2,344          | 7,295 |

**Table 9 – Cost Burden > 30%**

Data 2016-2020 CHAS  
Source:

### 4. Cost Burden > 50%

|                      | Renter       |                |                |       | Owner        |                |                |       |
|----------------------|--------------|----------------|----------------|-------|--------------|----------------|----------------|-------|
|                      | 0-30%<br>AMI | >30-50%<br>AMI | >50-80%<br>AMI | Total | 0-30%<br>AMI | >30-50%<br>AMI | >50-80%<br>AMI | Total |
| NUMBER OF HOUSEHOLDS |              |                |                |       |              |                |                |       |
| Small Related        | 0            | 0              | 370            | 370   | 540          | 325            | 0              | 865   |
| Large Related        | 0            | 0              | 75             | 75    | 29           | 24             | 0              | 53    |
| Elderly              | 1,024        | 255            | 100            | 1,379 | 1,089        | 478            | 152            | 1,719 |
| Other                | 0            | 1,580          | 244            | 1,824 | 393          | 0              | 0              | 393   |
| Total need by income | 1,024        | 1,835          | 789            | 3,648 | 2,051        | 827            | 152            | 3,030 |

**Table 10 – Cost Burden > 50%**

Data 2016-2020 CHAS  
Source:

### 5. Crowding (More than one person per room)

|                                       | Renter       |                |                |                 |       | Owner        |                |                |                 |       |
|---------------------------------------|--------------|----------------|----------------|-----------------|-------|--------------|----------------|----------------|-----------------|-------|
|                                       | 0-30%<br>AMI | >30-50%<br>AMI | >50-80%<br>AMI | >80-100%<br>AMI | Total | 0-30%<br>AMI | >30-50%<br>AMI | >50-80%<br>AMI | >80-100%<br>AMI | Total |
| NUMBER OF HOUSEHOLDS                  |              |                |                |                 |       |              |                |                |                 |       |
| Single family households              | 160          | 150            | 179            | 85              | 574   | 34           | 30             | 237            | 35              | 336   |
| Multiple, unrelated family households | 35           | 25             | 15             | 0               | 75    | 0            | 20             | 35             | 18              | 73    |

|                              | Renter    |             |             |              |       | Owner     |             |             |              |       |
|------------------------------|-----------|-------------|-------------|--------------|-------|-----------|-------------|-------------|--------------|-------|
|                              | 0-30% AMI | >30-50% AMI | >50-80% AMI | >80-100% AMI | Total | 0-30% AMI | >30-50% AMI | >50-80% AMI | >80-100% AMI | Total |
| Other, non-family households | 0         | 0           | 0           | 0            | 0     | 0         | 0           | 0           | 0            | 0     |
| Total need by income         | 195       | 175         | 194         | 85           | 649   | 34        | 50          | 272         | 53           | 409   |

**Table 11 – Crowding Information - 1/2**

Data Source: 2016-2020 CHAS

|                                  | Renter    |             |             |       | Owner     |             |             |       |
|----------------------------------|-----------|-------------|-------------|-------|-----------|-------------|-------------|-------|
|                                  | 0-30% AMI | >30-50% AMI | >50-80% AMI | Total | 0-30% AMI | >30-50% AMI | >50-80% AMI | Total |
| Households with Children Present | 812       | 650         | 1,016       | 2,478 | 1,207     | 967         | 1,510       | 3,684 |

**Table 12 – Crowding Information – 2/2**

Data Source: ACS data

### Describe the number and type of single person households in need of housing assistance.

According to American Community Survey (ACS) data, there are 16,780 households with a single householder in the city of Pueblo, 4,624 of whom were living in poverty -- that means 27.6% of all householders in single-person homes are below the poverty line. Given that information, it can reasonably be assumed that there are a significant number of single-person households experiencing difficulty finding affordable housing, pointing to a need for additional studio and one-bedroom units.

### Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

There are 28,958 people, or 17.3% of City's population, who identify as having one or more disabilities. Of individuals with disabilities, 36.5% live below the poverty line. The city and county of Pueblo have used CDBG dollars in Minor Home Repairs programs to help disabled, elderly, and low-income residents remain in decent, accessible housing, and citizens at public meetings voiced a preference for programs that allowed residents to stay in current housing stock wherever possible. These programs tend to target exactly the populations identified in this plan as disproportionately impacted by housing problems.

The Pueblo Police Department's 2023 Annual Report (the latest available) indicates that 1,164 incidents of domestic violence were reported, down from 1,505 in 2022 and 1,782 in 2021. In its 2024 Point in Time Count, which gathered evidence on the sheltered homeless population, the Colorado Coalition for

the Homeless (BOC COC) reported that fewer than 10 unhoused people in shelters were fleeing domestic violence. In 2023, a PIT count measuring both sheltered and unsheltered people counted 21 unhoused domestic violence victims, about 7% of the total at that time. However, it remains a priority to provide safe housing to this vulnerable population.

### **What are the most common housing problems?**

Stakeholders reported that given a lack of decent, affordable housing options, the area's lower-income households often face a choice between deficient, substandard housing and cost burden. As the data above show, the most significant housing issues identified are cost burden and severe cost burden.

Cost burden is defined as spending over 30% of household income on housing costs, such as mortgage or rent payments plus utilities, insurance and taxes.

According to CHAS data, 14.2% of City households are cost burdened and 13.14% are severely cost burdened. Overcrowding and substandard housing each affect 1% of City households. This points to a persistent need for an increase in affordable housing options and housing payment assistance. Previous CDBG dollars have been spent on rental assistance and eviction diversion programs, which are effective ways to quickly aid cost-burdened and severely cost-burdened households.

### **Are any populations/household types more affected than others by these problems?**

Cost burden and severe cost burden affect households across the income spectrum, though the need for affordable housing is felt most acutely by the lowest income households. In general, the rate of cost burden declines as household income increases.

Of all cost-burdened households, the largest groups were in the 0-30% AMI bracket: small related renter households (20%), elderly renters (14.2%), and elderly homeowners (17.7%). Among all severely cost-burdened households, renters in the 30-50% AMI group made up 21.5% of the total, while elderly homeowners in the 0-30% AMI bracket were also overrepresented, at 12.8% of all severely cost-burdened households. These numbers indicate a strong need for additional assistance for elderly residents, as well as more affordable options for lower-income renters of all types.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the**

**needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

According to the Colorado Coalition for the Homeless (BOC COC) 2023 Point in Time Count, the most common characteristics of unhoused individuals are disability (65%). The PIT count also noted that veterans made up 10% of the statewide unhoused total, even though U.S. Census data indicates veterans are only 7.2% of the Colorado population.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

Not applicable.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

As shown in the tables above, LMI renter-households with a severe housing cost burden greater than 50% of income tend to be elderly or small families, and homeowners who are severely cost-burdened are also elderly.

Food, transportation, healthcare, and other costs further reduce disposable income and the ability to save. These households are vulnerable to possible eviction and homelessness if their income is reduced for any reason or if they encounter an unexpected expense such as a medical emergency. These households must frequently choose between substandard housing that is affordable and decent housing that is unaffordable. There remains a strong need for decent, affordable housing.

**Discussion**

## NA-15 Disproportionately Greater Need: Housing Problems - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

HUD defines a disproportionately greater housing need when a racial or ethnic group experiences housing problems at a rate over 10 percentage points than that of the corresponding income level as a whole. The data table below summarizes the percentage of each racial/ethnic group experiencing housing problems by HUD Adjusted Median Family Income (HAMFI) levels. Where the HUD tables below report AMI, they refer to HAMFI. Housing problems include:

- Housing units lacking complete kitchen facilities and/or complete plumbing facilities
- Overcrowding (more than one person per room)
- Housing costs greater than 30% of income (i.e., cost burden)

*Note that Hispanic is an ethnicity and is counted separately from race. In the tables that follow, a person who identifies as Hispanic is only counted in the Hispanic row and is therefore not counted in a row representing their identified race.*

### 0%-30% of Area Median Income

| Housing Problems               | Has one or more of four housing problems | Has none of the four housing problems | Household has no/negative income, but none of the other housing problems |
|--------------------------------|------------------------------------------|---------------------------------------|--------------------------------------------------------------------------|
| Jurisdiction as a whole        | 8,122                                    | 3,173                                 | 0                                                                        |
| White                          | 3,943                                    | 1,287                                 | 0                                                                        |
| Black / African American       | 154                                      | 145                                   | 0                                                                        |
| Asian                          | 70                                       | 0                                     | 0                                                                        |
| American Indian, Alaska Native | 95                                       | 10                                    | 0                                                                        |
| Pacific Islander               | 0                                        | 0                                     | 0                                                                        |
| Hispanic                       | 3,638                                    | 1,652                                 | 0                                                                        |

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 30%-50% of Area Median Income

| Housing Problems               | Has one or more of four housing problems | Has none of the four housing problems | Household has no/negative income, but none of the other housing problems |
|--------------------------------|------------------------------------------|---------------------------------------|--------------------------------------------------------------------------|
| Jurisdiction as a whole        | 5,549                                    | 3,178                                 | 0                                                                        |
| White                          | 3,159                                    | 1,548                                 | 0                                                                        |
| Black / African American       | 64                                       | 35                                    | 0                                                                        |
| Asian                          | 25                                       | 10                                    | 0                                                                        |
| American Indian, Alaska Native | 54                                       | 35                                    | 0                                                                        |
| Pacific Islander               | 0                                        | 0                                     | 0                                                                        |
| Hispanic                       | 2,155                                    | 1,524                                 | 0                                                                        |

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 50%-80% of Area Median Income

| Housing Problems               | Has one or more of four housing problems | Has none of the four housing problems | Household has no/negative income, but none of the other housing problems |
|--------------------------------|------------------------------------------|---------------------------------------|--------------------------------------------------------------------------|
| Jurisdiction as a whole        | 4,574                                    | 7,773                                 | 0                                                                        |
| White                          | 2,749                                    | 4,351                                 | 0                                                                        |
| Black / African American       | 160                                      | 164                                   | 0                                                                        |
| Asian                          | 28                                       | 59                                    | 0                                                                        |
| American Indian, Alaska Native | 60                                       | 28                                    | 0                                                                        |
| Pacific Islander               | 10                                       | 0                                     | 0                                                                        |
| Hispanic                       | 1,525                                    | 2,952                                 | 0                                                                        |

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data 2016-2020 CHAS  
Source:

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 80%-100% of Area Median Income

| Housing Problems               | Has one or more of four housing problems | Has none of the four housing problems | Household has no/negative income, but none of the other housing problems |
|--------------------------------|------------------------------------------|---------------------------------------|--------------------------------------------------------------------------|
| Jurisdiction as a whole        | 1,245                                    | 5,634                                 | 0                                                                        |
| White                          | 805                                      | 2,983                                 | 0                                                                        |
| Black / African American       | 10                                       | 90                                    | 0                                                                        |
| Asian                          | 0                                        | 19                                    | 0                                                                        |
| American Indian, Alaska Native | 0                                        | 4                                     | 0                                                                        |
| Pacific Islander               | 0                                        | 0                                     | 0                                                                        |
| Hispanic                       | 393                                      | 2,473                                 | 0                                                                        |

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### Discussion

The percentage of households with a housing problem is highest for the lowest income brackets (0-50% HAMFI) and decreases as income increases. According to the above definitions, American Indian/Alaska Natives in the 0-30% income bracket experience disproportionate problems, as do Asian families earning between 0-30% of HAMFI, with all 70 Asian households in that bracket reporting one or more housing problems.

Black/African American households earning 50-80% of HAMFI were also disproportionately impacted by housing problems compared to the rest of the 50-80% income group.

While the data shows that Black, American Indian/Alaska Native and Asian households are disproportionately affected by housing problems, the small sample size for each of these minority groups limits statistical inferences.

## NA-20 Disproportionately Greater Need: Severe Housing Problems - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

HUD defines a disproportionately greater housing need when a racial or ethnic group experiences housing problems at a rate over 10 percentage points than that of the corresponding income level as a whole. The data table below summarizes the percentage of each racial/ethnic group experiencing severe housing problems by HUD Adjusted Median Family Income (HAMFI) levels. Where the HUD tables below report AMI, they refer to HAMFI. Severe housing problems include:

- Housing units lacking complete kitchen facilities and/or complete plumbing facilities
- Overcrowding (more than 1.5 persons per room)
- Housing costs greater than 50% of income (i.e., cost burden)

### 0%-30% of Area Median Income

| Severe Housing Problems*       | Has one or more of four housing problems | Has none of the four housing problems | Household has no/negative income, but none of the other housing problems |
|--------------------------------|------------------------------------------|---------------------------------------|--------------------------------------------------------------------------|
| Jurisdiction as a whole        | 6,683                                    | 4,608                                 | 0                                                                        |
| White                          | 3,214                                    | 2,013                                 | 0                                                                        |
| Black / African American       | 119                                      | 180                                   | 0                                                                        |
| Asian                          | 70                                       | 0                                     | 0                                                                        |
| American Indian, Alaska Native | 85                                       | 20                                    | 0                                                                        |
| Pacific Islander               | 0                                        | 0                                     | 0                                                                        |
| Hispanic                       | 3,023                                    | 2,272                                 | 0                                                                        |

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 30%-50% of Area Median Income

| Severe Housing Problems*       | Has one or more of four housing problems | Has none of the four housing problems | Household has no/negative income, but none of the other housing problems |
|--------------------------------|------------------------------------------|---------------------------------------|--------------------------------------------------------------------------|
| Jurisdiction as a whole        | 2,319                                    | 6,403                                 | 0                                                                        |
| White                          | 1,309                                    | 3,403                                 | 0                                                                        |
| Black / African American       | 39                                       | 55                                    | 0                                                                        |
| Asian                          | 25                                       | 10                                    | 0                                                                        |
| American Indian, Alaska Native | 30                                       | 59                                    | 0                                                                        |
| Pacific Islander               | 0                                        | 0                                     | 0                                                                        |
| Hispanic                       | 880                                      | 2,789                                 | 0                                                                        |

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 50%-80% of Area Median Income

| Severe Housing Problems*       | Has one or more of four housing problems | Has none of the four housing problems | Household has no/negative income, but none of the other housing problems |
|--------------------------------|------------------------------------------|---------------------------------------|--------------------------------------------------------------------------|
| Jurisdiction as a whole        | 1,069                                    | 11,288                                | 0                                                                        |
| White                          | 638                                      | 6,457                                 | 0                                                                        |
| Black / African American       | 0                                        | 320                                   | 0                                                                        |
| Asian                          | 8                                        | 74                                    | 0                                                                        |
| American Indian, Alaska Native | 20                                       | 65                                    | 0                                                                        |
| Pacific Islander               | 0                                        | 10                                    | 0                                                                        |
| Hispanic                       | 372                                      | 4,077                                 | 0                                                                        |

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 80%-100% of Area Median Income

| Severe Housing Problems*       | Has one or more of four housing problems | Has none of the four housing problems | Household has no/negative income, but none of the other housing problems |
|--------------------------------|------------------------------------------|---------------------------------------|--------------------------------------------------------------------------|
| Jurisdiction as a whole        | 203                                      | 6,679                                 | 0                                                                        |
| White                          | 164                                      | 3,618                                 | 0                                                                        |
| Black / African American       | 0                                        | 100                                   | 0                                                                        |
| Asian                          | 0                                        | 19                                    | 0                                                                        |
| American Indian, Alaska Native | 0                                        | 4                                     | 0                                                                        |
| Pacific Islander               | 0                                        | 0                                     | 0                                                                        |
| Hispanic                       | 38                                       | 2,828                                 | 0                                                                        |

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### Discussion

In general, the percentage of households with a severe housing problem is highest within the lowest income brackets (0-50% AMI) and decreases as income increases.

According to the above definitions, Asian households between 0-30% AMI and American Indian/Alaskan Native households between 0-30% AMI disproportionately experience severe housing problems, while Black/African American and Asian households earning between 30-50% AMI experienced a disproportionate level of severe problems.

While the data shows that Asian, Black, and American Indian/Alaskan Native households are disproportionately affected by housing problems, the small sample size for each of these minority groups limits statistical inferences.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens - 91.405, 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

HUD defines a disproportionately greater housing need when a racial or ethnic group experiences housing problems at a rate over 10 percentage points than that of the corresponding income level as a whole. "Cost-burdened" is defined as paying more than 30% of household income on housing, and severely cost burdened is defined as paying greater than 50% of household income on housing.

### Housing Cost Burden

| Housing Cost Burden            | <=30%  | 30-50% | >50%  | No / negative income (not computed) |
|--------------------------------|--------|--------|-------|-------------------------------------|
| Jurisdiction as a whole        | 44,643 | 10,175 | 9,133 | 988                                 |
| White                          | 26,047 | 5,924  | 4,678 | 385                                 |
| Black / African American       | 590    | 230    | 163   | 100                                 |
| Asian                          | 310    | 40     | 99    | 0                                   |
| American Indian, Alaska Native | 170    | 74     | 120   | 0                                   |
| Pacific Islander               | 45     | 10     | 25    | 0                                   |
| Hispanic                       | 16,604 | 3,725  | 3,858 | 503                                 |

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2016-2020 CHAS

### Discussion

The supplemental data table summarizes the percentage of each racial/ethnic group experiencing cost burden at various levels. Based on these definitions, no racial or ethnic group meets or exceeds the 10 percentage point threshold for disproportionate housing cost burden.

### **NA-30 Disproportionately Greater Need: Discussion - 91.205 (b)(2)**

**Are there any Income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

Several racial groups experienced disproportionately greater need than the needs of that income category as a whole, but the small numbers of those populations limit statistical inferences.

Housing problems:

- American Indian/Alaska Natives, 0-30% AMI
- Asian households, 0-30% AMI
- Black/African American households, 50-80% AMI

Severe housing problems:

- Asian households, 0-30% AMI and 30-50% AMI
- American Indian/Alaskan Native households, 0-30% AMI
- Black households, 30-50%

**If they have needs not identified above, what are those needs?**

The needs among race/ethnicities are indicated above. Income categories have more general needs as described in NA-10 and the Housing Market Analysis.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

According to ACS, the City of Pueblo is primarily white (70.3%) and Hispanic (48.4%). Black/African Americans and American Indian/Alaska Natives each make up 2.9% and 2.7% of the population, respectively, while Asians represent less than 1%.

For the purposes of this Consolidated Plan, concentration is defined as a census tract where a minority group's population is ten percentage points higher in that census tract than its proportion in the City's population.

See the Unique Appendix for additional information including a map of relevant ethnic and racial concentration by census tract in Pueblo.

## NA-35 Public Housing - 91.405, 91.205 (b)

### Introduction

The Housing Authority for the City of Pueblo (HACP) manages and operates public housing for the City to benefit eligible low-income families, seniors, and persons with disabilities. By working in partnership with the public and private sectors, HACP provides families with housing choice and the opportunity to achieve self-sufficiency. The information generated by the eCon tool in IDIS is insufficient to adequately describe the City's public housing; therefore, the supplemental tables in the following sections were populated using data that was gathered from the HACP.

See the Unique Appendix for additional information.

### Totals in Use

|                            | Certificate | Mod-Rehab | Public Housing | Program Type |                 |                |                                     |                            |            |
|----------------------------|-------------|-----------|----------------|--------------|-----------------|----------------|-------------------------------------|----------------------------|------------|
|                            |             |           |                | Vouchers     |                 |                |                                     |                            |            |
|                            |             |           |                | Total        | Project - based | Tenant - based | Special Purpose Voucher             |                            |            |
|                            |             |           |                |              |                 |                | Veterans Affairs Supportive Housing | Family Unification Program | Disabled * |
| # of units vouchers in use | 33          | 216       | 875            | 1,430        | 1               | 1,357          | 32                                  | 0                          | 0          |

Table 22 - Public Housing by Program Type

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

## Characteristics of Residents

|                                                 | Program Type |           |                |          |                 |                |                                     |                            |
|-------------------------------------------------|--------------|-----------|----------------|----------|-----------------|----------------|-------------------------------------|----------------------------|
|                                                 | Certificate  | Mod-Rehab | Public Housing | Vouchers |                 |                | Special Purpose Voucher             |                            |
|                                                 |              |           |                | Total    | Project - based | Tenant - based | Veterans Affairs Supportive Housing | Family Unification Program |
| Average Annual Income                           | 6,338        | 7,555     | 13,314         | 10,341   | 4,368           | 10,226         | 6,973                               | 0                          |
| Average length of stay                          | 2            | 3         | 4              | 7        | 0               | 7              | 0                                   | 0                          |
| Average Household size                          | 2            | 2         | 2              | 2        | 2               | 2              | 1                                   | 0                          |
| # Homeless at admission                         | 0            | 0         | 1              | 4        | 0               | 2              | 2                                   | 0                          |
| # of Elderly Program Participants (>62)         | 1            | 15        | 253            | 215      | 0               | 210            | 3                                   | 0                          |
| # of Disabled Families                          | 9            | 75        | 196            | 583      | 0               | 546            | 19                                  | 0                          |
| # of Families requesting accessibility features | 33           | 216       | 875            | 1,430    | 1               | 1,357          | 32                                  | 0                          |
| # of HIV/AIDS program participants              | 0            | 0         | 0              | 0        | 0               | 0              | 0                                   | 0                          |
| # of DV victims                                 | 0            | 0         | 0              | 0        | 0               | 0              | 0                                   | 0                          |

**Table 23 – Characteristics of Public Housing Residents by Program Type**

**Data Source:** PIC (PIH Information Center)

## Race of Residents

| Race                                                                                                          | Certificate | Mod-Rehab | Public Housing | Program Type |                 |                |                                     |                            |            |
|---------------------------------------------------------------------------------------------------------------|-------------|-----------|----------------|--------------|-----------------|----------------|-------------------------------------|----------------------------|------------|
|                                                                                                               |             |           |                | Vouchers     |                 |                |                                     |                            |            |
|                                                                                                               |             |           |                | Total        | Project - based | Tenant - based | Special Purpose Voucher             |                            |            |
|                                                                                                               |             |           |                |              |                 |                | Veterans Affairs Supportive Housing | Family Unification Program | Disabled * |
| White                                                                                                         | 31          | 206       | 841            | 1,362        | 1               | 1,296          | 27                                  | 0                          | 0          |
| Black/African American                                                                                        | 2           | 9         | 31             | 65           | 0               | 59             | 4                                   | 0                          | 0          |
| Asian                                                                                                         | 0           | 1         | 0              | 1            | 0               | 1              | 0                                   | 0                          | 0          |
| American Indian/Alaska Native                                                                                 | 0           | 0         | 3              | 2            | 0               | 1              | 1                                   | 0                          | 0          |
| Pacific Islander                                                                                              | 0           | 0         | 0              | 0            | 0               | 0              | 0                                   | 0                          | 0          |
| Other                                                                                                         | 0           | 0         | 0              | 0            | 0               | 0              | 0                                   | 0                          | 0          |
| <b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b> |             |           |                |              |                 |                |                                     |                            |            |

Table 24 – Race of Public Housing Residents by Program Type

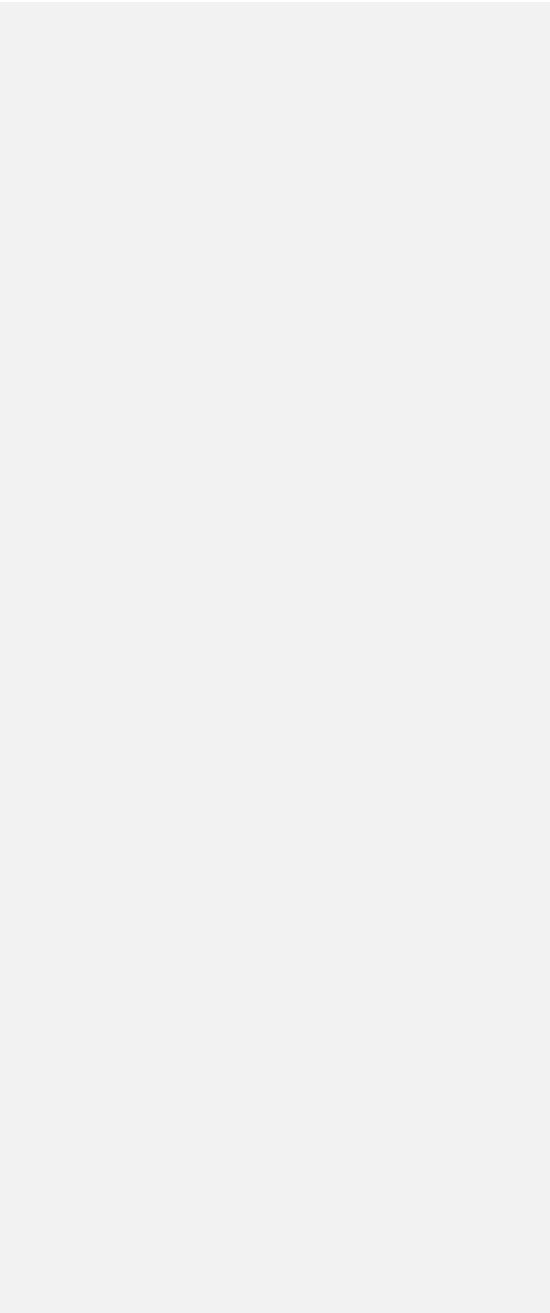
Data Source: PIC (PIH Information Center)

## Ethnicity of Residents

| Ethnicity                                                                                                     | Certificate | Mod-Rehab | Public Housing | Program Type |                 |                |                                     |                            |            |
|---------------------------------------------------------------------------------------------------------------|-------------|-----------|----------------|--------------|-----------------|----------------|-------------------------------------|----------------------------|------------|
|                                                                                                               |             |           |                | Vouchers     |                 |                |                                     |                            |            |
|                                                                                                               |             |           |                | Total        | Project - based | Tenant - based | Special Purpose Voucher             |                            |            |
|                                                                                                               |             |           |                |              |                 |                | Veterans Affairs Supportive Housing | Family Unification Program | Disabled * |
| Hispanic                                                                                                      | 15          | 112       | 504            | 878          | 0               | 839            | 10                                  | 0                          | 0          |
| Not Hispanic                                                                                                  | 18          | 104       | 371            | 552          | 1               | 518            | 22                                  | 0                          | 0          |
| <b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b> |             |           |                |              |                 |                |                                     |                            |            |

Table 25 – Ethnicity of Public Housing Residents by Program Type

**Data Source:** PIC (PIH Information Center)



**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 requires that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible. According to data provided by HACP, 4 of the public housing units are ADA/504 Accessible. Data of the accessibility of HCV/Section 8 units is not available.

HACP does not currently maintain a waiting list for accessible units; however it intends to create a separate wait-list for ADA-accessible units as part of its 2021 Annual Plan. The data provided by the HACP indicates that 17 families in public housing and 9 voucher-holding families requested accessibility features.

**What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?**

According to HACP's 2021 Annual Plan, there are 742 families on the public housing waiting list; over ninety percent (674) are extremely low income, and 78% (580) are families with children. The greatest needs of households currently living in public housing continue to be stable, decent living conditions and access to opportunity in the form of employment, education, and/or transportation connections to neighborhood amenities. HACP continues to address the most immediate needs of its public housing residents by keeping the maximum number of public housing units possible available and in good condition.

There are 473 families on HACP's waiting list for HCV/Section 8 housing; over ninety-percent (442) are extremely low income, and 84% (396) are families with children. For households utilizing the Housing Choice Voucher (HCV) program, the immediate need is an increased supply of decent, affordable housing. Additional needs of those households accessing various forms of publicly supported housing include access to employment supportive public transportation, employment opportunities, and barrier removal for the elderly and disabled.

**How do these needs compare to the housing needs of the population at large**

A majority of City households are cost-burdened, emphasizing a need to increase the supply of affordable housing as well as its quality to improve housing choice, living environments, and promote self-sufficiency of LMI households. According to CHAS data, of renter-households earning below 30% HAMFI, 52% of other (non-family) households, 43% of large related households, and 42% of small related households are cost burdened; of renter-households in this income tier, 84% of other

households, 77% of large related households, and 73% of small related households are severely cost burdened. Stakeholders reported that the waiting lists for public housing and the Section 8 Voucher Program are between 3 and 5 years. Until a unit or voucher becomes available, households on the waiting list continue to subsist on extremely low incomes in housing conditions that are likely unaffordable, inadequate, or both.

## **Discussion**

NA-40 Homeless Needs Assessment - 91.405, 91.205 (c)

Introduction:

Pueblo is a member of the statewide Colorado Coalition for the Homeless and receives funding through the statewide balance. The Colorado Balance of State Continuum of Care (BoS CoC) conducts an annual point-in-time (PIT) count of people experiencing homelessness. The PIT provides a “snapshot” of the homeless population and subpopulations for the Colorado Balance of State and captures information about demographic characteristics and risk factors related to homelessness.

The Colorado BoS CoC conducts a sheltered count every year and both a sheltered and unsheltered count every odd year; the 2024 PIT count only records sheltered unhoused people. Of those 120 counted in 2024, 101 were in emergency housing and 19 were in transitional housing. Twenty-one had some type of disabling condition -- 12 had a physical disability while 10 had a mental health concern. Ten were classified as using substances.

The 2023 PIT count (the latest available) noted that Pueblo was one of the three Colorado counties with the largest share of unhoused individuals, at 16%. In that count, 137 people were in emergency shelter or transitional housing, while 222 people were unsheltered.

The below table indicates all the information available in the 2023 PIT count; where the information is not available, fields are left blank.

Homeless Needs Assessment

| Population                                         | Estimate the # of persons experiencing homelessness on a given night |             | Estimate the # experiencing homelessness each year | Estimate the # becoming homeless each year | Estimate the # exiting homelessness each year | Estimate the # of days persons experience homelessness |
|----------------------------------------------------|----------------------------------------------------------------------|-------------|----------------------------------------------------|--------------------------------------------|-----------------------------------------------|--------------------------------------------------------|
|                                                    | Sheltered                                                            | Unsheltered |                                                    |                                            |                                               |                                                        |
| Persons in Households with Adult(s) and Child(ren) | 0                                                                    | 0           | 0                                                  | 0                                          | 0                                             | 0                                                      |
| Persons in Households with Only Children           | 0                                                                    | 0           | 0                                                  | 0                                          | 0                                             | 0                                                      |

| Population                             | Estimate the # of persons experiencing homelessness on a given night |             | Estimate the # experiencing homelessness each year | Estimate the # becoming homeless each year | Estimate the # exiting homelessness each year | Estimate the # of days persons experience homelessness |
|----------------------------------------|----------------------------------------------------------------------|-------------|----------------------------------------------------|--------------------------------------------|-----------------------------------------------|--------------------------------------------------------|
|                                        | Sheltered                                                            | Unsheltered |                                                    |                                            |                                               |                                                        |
| Persons in Households with Only Adults | 0                                                                    | 0           | 0                                                  | 0                                          | 0                                             | 0                                                      |
| Chronically Homeless Individuals       | 125                                                                  | 9           | 134                                                | 0                                          | 0                                             | 0                                                      |
| Chronically Homeless Families          | 0                                                                    | 0           | 0                                                  | 0                                          | 0                                             | 0                                                      |
| Veterans                               | 18                                                                   | 3           | 21                                                 | 0                                          | 0                                             | 0                                                      |
| Unaccompanied Child                    | 0                                                                    | 0           | 2                                                  | 0                                          | 0                                             | 0                                                      |
| Persons with HIV                       | 2                                                                    | 0           | 0                                                  | 0                                          | 0                                             | 0                                                      |

**Table 26 - Homeless Needs Assessment**

**Data Source Comments:** Balance of State Colorado PIT count 2023

Indicate if the homeless population is: ☐ Has No Rural Homeless

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

Data for the number of persons becoming and exiting homelessness each year and the number of days that persons experienced homelessness is not available for homeless individuals and families, families with children, veterans and their families, and unaccompanied youth in the City of Pueblo. This data is not collected at this time.

However, the 2023 PIT for the BOS found that 81% were households with only adults, but 18% were households with at least one adult and one child. Unaccompanied children were 2% of the total. Notably, 62% of unhoused adults had one or more disabling condition, and 37% of all unhoused adults were chronically homeless, pointing toward the need for additional services for these individuals.

### Nature and Extent of Homelessness: (Optional)

| Race:                            | Sheltered: | Unsheltered (optional) |
|----------------------------------|------------|------------------------|
| White                            | 100        | 129                    |
| Black or African American        | 10         | 8                      |
| Asian                            | 1          | 1                      |
| American Indian or Alaska Native | 13         | 21                     |
| Pacific Islander                 | 0          | 2                      |
| Ethnicity:                       | Sheltered: | Unsheltered (optional) |
| Hispanic                         | 63         | 64                     |
| Not Hispanic                     | 74         | 89                     |

Data Source

Comments:

Balance of State Colorado PIT count 2023

### Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

The PIT count for the BOS found that 18% of unhoused people in Pueblo were households with at least one adult and one child. Pueblo's PIT counted 21 veterans (both sheltered and unsheltered) in need of housing assistance, but did not include information on families of veterans.

Economic factors in housing supply have increased housing costs. Families with young children are also burdened with childcare expenses, or lack of economic opportunity if they can't secure childcare during working hours, increasing precarity for these households. Increasing affordable one- or two-bedroom housing units (for example, through more multifamily construction) may help ease cost burdens through greater supply. These households would likely also benefit from rental assistance.

### Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

Homelessness percentages tend to closely follow the city's racial and ethnic demographics. The City's population is 48% Hispanic, and 49% of unhoused individuals in the 2023 PIT count were Hispanic. Pueblo is 70.3% white, and 73% of the homeless population was white. However, Black/African Americans make up 2.7% of the city's population, but 6% of its homeless percentages.

### Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

According to the 2023 CO BOS PIT data for Pueblo, most unhoused people are unsheltered -- 62% were unsheltered, compared to 38% that were either in emergency shelters or transitional housing. Only 12% of the total were in transitional housing. Given that transitional housing is a pathway to stable permanent housing for many types of unhoused individuals, an increase in transitional housing may be beneficial for long-term help for the unhoused population in Pueblo. The PIT count also noted that 37% of unhoused individuals had a chronic illness, and 17% had a serious mental illness, while 11% had a substance abuse disorder.

**Discussion:**

## **NA-45 Non-Homeless Special Needs Assessment - 91.405, 91.205 (b,d)**

### **Introduction**

Persons with special needs include the elderly and frail elderly, persons with severe mental illness, persons with developmental disabilities, persons with physical disabilities, and persons with alcohol/other drug addictions. In addition, many persons with such special needs also have very low incomes.

### **Describe the characteristics of special needs populations in your community:**

Individuals who have special needs are typically extremely low income and face tremendous challenges finding housing that they can afford. Individuals with special needs may also require supportive services in addition to affordable housing. Public and private sources have limited funds available for these purposes, making it difficult for non-profit organizations to develop and operate housing and supportive service programs.

#### Elderly

Elderly persons are more likely to live on fixed, very low incomes or require special supportive service to complete their daily routines. This means elderly residents especially need affordable housing options and easy access to service providers.

According to ACS 2019-2023 estimates, 18.6% of residents in the city are aged 65 or over. In addition, the Census reported that 45.6% of persons 65 years and over had at least one disability; 30.3% of whom experienced an ambulatory difficulty and 17% experienced an independent living difficulty.

#### Persons with Disabilities

According to the ACS, 20.9% of the City's population identify as having one or more disabilities.

In the City, 19.2% of the population lives below the poverty line. However, there are differences in the incidence of poverty by disability status. For people with a disability, 36.5% live below the poverty line.

#### Substance Abuse and Addiction

Behavioral health, including substance abuse, has been a frequent priority of the Pueblo County Public Health Department. In Pueblo County, the overdose death rate has fallen dramatically after public

health initiatives to address the issue. In 2022, the overdose death rate was 22.87 per 100,000; by 2024, that rate had fallen to 18.89 per 100,000. However, substance abuse remains a detriment. Overdose deaths overwhelmingly affect males, with age groups 30-39 and 50-59 most commonly affected (at 29% and 21%, respectively).

**What are the housing and supportive service needs of these populations and how are these needs determined?**

Summarizing the above estimates and input received during stakeholder interviews held in preparing the Five-Year Consolidated Plan, the most significant needs for these populations are:

- Access to clean, safe, and affordable housing for renters and owners;
- Assistance making repairs to owner-occupied homes, including accessibility improvements;
- Removal of abandoned or unsafe/blighted homes, and replacement with new housing
- Removal of abandoned blighted commercial
- Rehabilitation of rental units;
- Increasing the number of designated supportive housing units and permanent supportive housing for families and people discharging from institutions, including respite beds for persons with medical needs; and
- Increasing emergency shelter beds.

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

The Housing Opportunities for Persons With AIDS (HOPWA) Program is the only Federal program dedicated to the housing needs of people living with HIV/AIDS. Under the HOPWA Program, HUD makes grants to local communities, States, and nonprofit organizations for projects that benefit low-income persons living with HIV/AIDS and their families. The City of Pueblo does not receive HOPWA funds.

**If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))**

**Discussion:**

## **NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)**

### **Describe the jurisdiction's need for Public Facilities:**

Through CDBG funds, the City of Pueblo can fund the construction, rehabilitation, or installation of public facilities. Eligible public facilities include neighborhood facilities (such as educational centers, parks, recreation centers, and libraries) and facilities for special needs populations (such as homeless shelters, elderly facilities, or centers for people with disabilities).

Stakeholder interviews cited a strong need for additional facilities to aid the unhoused population. Public meeting responses and public survey data also focused on homelessness facilities, but additionally highlighted the need for community centers, public transportation, healthcare facilities, and parks & recreation facilities.

### **How were these needs determined?**

The City of Pueblo facilitated a series of stakeholder communications, a public survey, and public meetings regarding the needs across the community. Additionally, Pueblo analyzed CHAS data on housing problems and cost burden in the community, ACS data on poverty among groups such as elderly and the disabled, and the Colorado Coalition for the Homeless point-in-time count.

### **Describe the jurisdiction's need for Public Improvements:**

Through the investment of CDBG funds, the City can also fund the construction, rehabilitation, or installation of public improvements. Public improvements include, but are not limited to, street and sidewalk improvements, water and sewer installation, and maintenance and ADA compliance construction and rehabilitation.

According to public survey data and public meeting discussion, improvements to roads, sidewalks and public transportation could improve public safety as well as enhance lower-income residents' economic opportunities by making it easier to access jobs and services.

### **How were these needs determined?**

The City of Pueblo facilitated a series of stakeholder interviews and public meetings and received feedback regarding the needs across the community.

### **Describe the jurisdiction's need for Public Services:**

Through the investment of CDBG funds, the City can fund an array of public services. Eligible public services include, but are not limited to, homeless services, education and workforce development programs, homebuyer counseling, elderly care and programs, and childcare and health services for low-moderate-income households.

According to public survey responses and public meeting discussions, public service needs include:

- Youth programs (day programs, summer camps, after-school activities, and job training);
- Mental health services for individuals and families who are homeless or at risk of homelessness;
- Substance abuse services
- Homeless services to help individuals maintain housing and economic independence

#### **How were these needs determined?**

The City of Pueblo facilitated a series of stakeholder interviews and public meetings and received feedback regarding the needs across the community.

## Housing Market Analysis

### MA-05 Overview

#### Housing Market Analysis Overview:

This market analysis identifies the need to advance efforts to create a diverse supply of additional affordable units. Ideally, the City of Pueblo will have a mix of housing to accommodate households of all types and income levels. The City's housing strategies will be especially guided by the increasing mismatch between incomes and housing costs and the specific accommodations necessary to ensure that special needs populations have adequate affordable housing options with appropriate supportive services where needed.

General conclusions about the market, as described in the following pages, include:

- Single family units – which tend to be larger than multi-family units – comprise 75% of the housing stock. There is a need for more multi-family housing units which tend to be more affordable, particularly for small families with children and single-person households, demographic groups particularly prone to cost burden and severe cost burden.
- The high incidence of poverty among households with children and persons with disabilities points to the need for affordable housing, particularly within the renter-occupied market.
- Stakeholders noted that the available housing inventory is inadequate across all price points; the fair market rent for a two-bedroom apartment in Pueblo is well out of reach for a full-time minimum wage worker, even with recent increases in Colorado's minimum wage.
- A majority of the housing stock, both renter- and owner-occupied units, in the City was constructed prior to 1979. The age of the housing stock points to the need for residential rehabilitation of both renter- and owner-occupied units.
- The greatest number of employment opportunities within the City occur in the education and health care sector, which generally require a minimum of a Bachelor's degree. This sector also imports the largest number of workers, suggesting that the current workforce does not have training or education that match the employment opportunities in the City, and that additional training or retraining opportunities are needed and/or may not be utilized by currently unemployed residents.

## MA-10 Housing Market Analysis: Number of Housing Units - 91.410, 91.210(a)&(b)(2)

### Introduction

According to the below CHAS data, there are 70,887 total residential units in the city of Pueblo, the vast majority (75%) of which are single-unit detached. Large multi-family (20+ units in a building) and alternative types of units (mobile homes, boats, etc.) are the next most-common types of housing, at 6% apiece.

According to 2019-2023 American Community Survey data, most housing is owner-occupied (68.3%), and 84.5% of the population has been living in their current homes for more than one year.

Housing size follows a few notable patterns, according to ACS data: Owner-occupied units are typically larger homes, with a notable concentration in the 3-bedroom (11,952 units) and 4+ bedroom (8,323 units) categories. Conversely, renter-occupied units are heavily concentrated in smaller dwellings, with a substantial majority in the 0-1 bedroom (5,112 units) and 2-bedroom (7,522 units) ranges.

There is a need for more multi-family housing units which tend to be more affordable, particularly for small families with children, the elderly, and the disabled, demographic groups that frequently live below the poverty line.

Data from the 2023 ACS indicates that among the entire County population, 15.4% live below the poverty line. Among children under the age of 18 and seniors over the age of 65, approximately 19.4% and 18%, respectively, live below the poverty line. For persons with a disability, 16% live below the poverty line. The high incidence of poverty among households with children, seniors, and persons with disabilities points to the need for affordable housing, particularly within the renter-occupied market.

### All residential properties by number of units

| Property Type                   | Number        | %           |
|---------------------------------|---------------|-------------|
| 1-unit detached structure       | 53,165        | 75%         |
| 1-unit, attached structure      | 2,505         | 4%          |
| 2-4 units                       | 3,648         | 5%          |
| 5-19 units                      | 3,020         | 4%          |
| 20 or more units                | 4,545         | 6%          |
| Mobile Home, boat, RV, van, etc | 4,004         | 6%          |
| <b>Total</b>                    | <b>70,887</b> | <b>100%</b> |

Table 27 – Residential Properties by Unit Number

Data Source: 2016-2020 ACS

## Unit Size by Tenure

|                    | Owners        |             | Renters       |             |
|--------------------|---------------|-------------|---------------|-------------|
|                    | Number        | %           | Number        | %           |
| No bedroom         | 169           | 0%          | 870           | 4%          |
| 1 bedroom          | 858           | 2%          | 5,189         | 23%         |
| 2 bedrooms         | 8,729         | 21%         | 8,174         | 36%         |
| 3 or more bedrooms | 32,494        | 77%         | 8,463         | 37%         |
| <b>Total</b>       | <b>42,250</b> | <b>100%</b> | <b>22,696</b> | <b>100%</b> |

Table 28 – Unit Size by Tenure

Data Source: 2016-2020 ACS

### Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.

Currently, the portfolio of the Public Housing Program, operated by the Housing Authority of the City of Pueblo (HACP), has 689 rental units ensuring long-term housing. The Low-Income Tax Credit (LIHTC) properties have 286 units, of which 121 units are the Project Based Rental Assistance Program, and 55 units are Project Based Voucher Program which are tied to subsidized housing for long-term affordability.

The remaining 110 LIHTC properties are of mixed-income developments that promote sustainable affordability. HACP prioritized housing solutions for elderly residents and people with disabilities with 132 units in Section 8 New Construction and 96 units in the 202 PRAC programs. The Housing Choice Voucher Program enables family rental assistance in the private market. Currently, there are approximately 1,200 vouchers being administered by HACP.

HOME activities undertaken in 2023 included two new multi-family construction projects (77 units), one multi-family rehabilitation project (16 units), and continued tenant-based rental assistance.

### Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.

Housing units that receive tax credits or other forms of assistance can be at risk of being converted to market rate housing upon maturity of the tax credits or the affordability period, typically 15, 20, or 30 years. Without subsidies, many of these units will be lost to the low-income market, either through higher, non-subsidized rents being charged or from owners abandoning or converting units. The potential loss of these units would be significant in Pueblo should Section 8 subsidies not be renewed. If any of these units are lost to the low-income residents, HACP's waiting list will likely increase. However, subsidies are, in most cases, renewed as the owners of such housing often opt to stay in the program to ensure rent payments.

### **Does the availability of housing units meet the needs of the population?**

The number of available housing units is insufficient to meet the needs of the population. According to HACP's 2021 Annual Plan, there are 742 families on the public housing waiting list; over ninety percent (674) are extremely low income, and 78% (580) are families with children. There are 473 families on HACP's waiting list for HCV/Section 8 housing; over ninety-percent (442) are extremely low income, and 84% (396) are families with children.

### **Describe the need for specific types of housing:**

Single family units – which tend to be larger than multi-family units – comprise 75% of the housing stock. There is a need for more multi-family housing units which tend to be more affordable, particularly for small families with children, the disabled, and the elderly. Stakeholders confirmed these findings, reporting that the greatest need is split between studio/one-bedroom apartments and multi-family units.

### **Discussion**

MA-15 Housing Market Analysis: Cost of Housing - 91.410, 91.210(a)

Introduction

The HUD-provided table below (Table 44) indicates the number of affordable units available to households with various income levels.

The 2,394 rental units identified as affordable to households earning 30% of the HUD-adjusted Median Family Income (HAMFI) represent 9.4% of the 25,557 units of renter-occupied housing inventory in the County as of the below charts, which incorporate data from 2020. Just over 31% of renter housing is affordable to households earning 50% HAMFI.

The Fair Market Rent (FMR) for a two-bedroom unit in the County of Pueblo in 2020 was \$1,124 per month, according to the below tables. To avoid being cost burdened, a household needed to earn \$44,960 per year, or roughly \$21.61 per hour. (The minimum wage in Colorado was \$12 per hour in 2020, meaning a worker would earn \$24,960 per year for a 40-hour workweek.)

Fair market rent for a two-bedroom has increased to \$1,258 in 2025, meaning a household would need to earn \$50,320 in order not to be cost burdened. The minimum wage has increased to \$14.89 as of 2025, or \$30.97 for a 40-hour workweek, still leaving minimum-wage earners unable to comfortably afford a FMR two-bedroom on a 40-hour workweek.

Cost of Housing

|                      | Base Year: 2009 | Most Recent Year: 2020 | % Change |
|----------------------|-----------------|------------------------|----------|
| Median Home Value    | 0               | 0                      | 0%       |
| Median Contract Rent | 0               | 0                      | 0%       |

Table 29 – Cost of Housing

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

| Rent Paid       | Number | %     |
|-----------------|--------|-------|
| Less than \$500 | 5,570  | 24.5% |
| \$500-999       | 13,311 | 58.6% |
| \$1,000-1,499   | 3,135  | 13.8% |
| \$1,500-1,999   | 425    | 1.9%  |
| \$2,000 or more | 185    | 0.8%  |
| Total           | 22,626 | 99.7% |

Table 30 - Rent Paid

Data Source: 2016-2020 ACS

|                      | Base Year: 2010                  |                                  | Most Recent Year: 2015 |           | % Change                     |                             |
|----------------------|----------------------------------|----------------------------------|------------------------|-----------|------------------------------|-----------------------------|
|                      | City                             | County                           | City                   | County    | City                         | County                      |
| Median Home Value    | \$120,600<br>(\$130,073 in 2015) | \$140,700<br>(\$151,752 in 2015) | \$114,200              | \$138,600 | -5.31%<br>(-12.20% adjusted) | -1.49%<br>(-8.67% adjusted) |
| Median Contract Rent | \$517<br>(\$558 in 2015)         | \$537<br>(\$579 in 2015)         | \$577                  | \$601     | 11.61%<br>(3.48% adjusted)   | 11.92%<br>(3.77% adjusted)  |
| Median Income        | \$34,323<br>(\$37,019 in 2015)   | \$40,699<br>(\$43,896 in 2015)   | \$34,550               | \$41,286  | 0.66%<br>(-6.67% adjusted)   | 1.44%<br>(-5.95% adjusted)  |

Source: 2006-2010 5-Year ACS (2009 5-Year Estimates no longer available), 2011-2015 5-Year ACS (B19013, B25077, B25058)

## Housing Affordability

| Number of Units affordable to Households earning | Renter        | Owner         |
|--------------------------------------------------|---------------|---------------|
| 30% HAMFI                                        | 2,394         | No Data       |
| 50% HAMFI                                        | 7,972         | 4,684         |
| 80% HAMFI                                        | 15,191        | 13,415        |
| 100% HAMFI                                       | No Data       | 19,075        |
| <b>Total</b>                                     | <b>25,557</b> | <b>37,174</b> |

Table 31 – Housing Affordability

Data Source: 2016-2020 CHAS

## Monthly Rent

| Monthly Rent (\$) | Efficiency (no bedroom) | 1 Bedroom | 2 Bedroom | 3 Bedroom | 4 Bedroom |
|-------------------|-------------------------|-----------|-----------|-----------|-----------|
| Fair Market Rent  | 815                     | 854       | 1,124     | 1,471     | 1,674     |
| High HOME Rent    | 657                     | 661       | 875       | 1,124     | 1,234     |
| Low HOME Rent     | 596                     | 638       | 766       | 885       | 987       |

Table 32 – Monthly Rent

Data Source: HUD FMR and HOME Rents

## Is there sufficient housing for households at all income levels?

There is insufficient housing for 0-80% HAMFI income groups, particularly for extremely low- and very low- income households in the City.

According to 2020 CHAS data analyzed in the Needs Assessment, there are 20,005 households earning between 0% and 50% of the median family income in Pueblo. However, there are only 15,050 housing units (both renter and owner-occupied) affordable to these households, accommodating only 75.2% of this population. Stakeholders also noted that the available housing inventory is inadequate across all price points.

### **How is affordability of housing likely to change considering changes to home values and/or rents?**

Median income has struggled to keep pace with inflation in recent years. For example, although the Federal Reserve Bank of St. Louis estimates that Pueblo County income rose from \$50,885 in 2020 to \$63,801 in 2023 (the latest estimate), the Bureau of Labor Statistic's inflation calculator shows a household would need to earn \$65,138 to maintain buying power over that time. That erosion of buying power presents challenges for affording housing.

As for housing costs specifically, the County and City of Pueblo commissioned a Housing Assessment and Strategy Report, released in 2021 and updated in 2024, noting the particular difficulties of maintaining and increasing affordable housing stock in the current economic and regulatory environment. In 2024, the report noted that apartment rents had spiked an average of 30% from mid-2021 to the end of 2022, while single-family-home sales prices had also risen noticeably, with the average price increasing by 150% over the previous 10 years. New housing development of all types is the core solution to these problems, according to the report, but housing production has not kept pace. The report noted that construction costs are not favorable for rapid production for the foreseeable future, forecasting a continued housing shortage that prevents more affordable housing. It recommended regulatory revisions to ease the high cost of construction, and Pueblo is currently changing its zoning ordinances to facilitate this.

### **How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

Area Median Rent is \$1,268, while the FMR for a 2-bedroom unit is \$1,124. As discussed above, the FMR is not attainable for most lower-income households. Rental housing costs are increasing while median income struggles to keep up, meaning that housing costs account for a relatively larger share of income for renters.

As housing construction and rehabilitation costs rise, it will be increasingly difficult to produce much needed affordable housing. Efficient creation of new affordable units is important for maintaining affordability.

### **Discussion**

## MA-20 Housing Market Analysis: Condition of Housing - 91.410, 91.210(a)

### Introduction

The following data provide an overview of the condition of housing in the City of Pueblo.

### Describe the jurisdiction's definition of "standard condition" and "substandard condition but suitable for rehabilitation":

Standard Condition: No major structural defects; adequate plumbing and kitchen facilities; appearance which does not create a blighting influence; and the house meets additional, more stringent, local standards and building codes, including lead-based paint clearance.

Substandard Condition but Suitable for Rehabilitation: The nature of the substandard condition makes rehabilitation both financially and structurally feasible.

### Housing Conditions

Condition of units is assessed using the same criteria as in the Needs Assessment. This includes: 1) lacks complete plumbing facilities, 2) lacks complete kitchen facilities, 3) more than one person per room, 4) cost burden (amount of income allocated to housing) is greater than 30%, and 5) complies with applicable building code standards.

### Condition of Units

| Condition of Units             | Owner-Occupied |             | Renter-Occupied |             |
|--------------------------------|----------------|-------------|-----------------|-------------|
|                                | Number         | %           | Number          | %           |
| With one selected Condition    | 9,460          | 22%         | 10,335          | 46%         |
| With two selected Conditions   | 223            | 1%          | 740             | 3%          |
| With three selected Conditions | 0              | 0%          | 50              | 0%          |
| With four selected Conditions  | 0              | 0%          | 0               | 0%          |
| No selected Conditions         | 32,570         | 77%         | 11,577          | 51%         |
| <b>Total</b>                   | <b>42,253</b>  | <b>100%</b> | <b>22,702</b>   | <b>100%</b> |

Table 33 - Condition of Units

Data Source: 2016-2020 ACS

### Year Unit Built

| Year Unit Built | Owner-Occupied |     | Renter-Occupied |     |
|-----------------|----------------|-----|-----------------|-----|
|                 | Number         | %   | Number          | %   |
| 2000 or later   | 9,448          | 22% | 3,339           | 15% |
| 1980-1999       | 9,013          | 21% | 4,805           | 21% |
| 1950-1979       | 16,196         | 38% | 9,280           | 41% |

| Year Unit Built | Owner-Occupied |            | Renter-Occupied |             |
|-----------------|----------------|------------|-----------------|-------------|
|                 | Number         | %          | Number          | %           |
| Before 1950     | 7,544          | 18%        | 5,260           | 23%         |
| <b>Total</b>    | <b>42,201</b>  | <b>99%</b> | <b>22,684</b>   | <b>100%</b> |

**Table 34 – Year Unit Built**

Data Source: 2016-2020 CHAS

#### Risk of Lead-Based Paint Hazard

| Risk of Lead-Based Paint Hazard                       | Owner-Occupied |     | Renter-Occupied |     |
|-------------------------------------------------------|----------------|-----|-----------------|-----|
|                                                       | Number         | %   | Number          | %   |
| Total Number of Units Built Before 1980               | 23,740         | 56% | 14,540          | 64% |
| Housing Units build before 1980 with children present | 3,760          | 9%  | 2,231           | 10% |

**Table 35 – Risk of Lead-Based Paint**

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

#### Vacant Units

|                          | Suitable for Rehabilitation | Not Suitable for Rehabilitation | Total |
|--------------------------|-----------------------------|---------------------------------|-------|
| Vacant Units             | 0                           | 0                               | 0     |
| Abandoned Vacant Units   | 0                           | 0                               | 0     |
| REO Properties           | 0                           | 0                               | 0     |
| Abandoned REO Properties | 0                           | 0                               | 0     |

**Table 36 - Vacant Units**

Data Source: 2005-2009 CHAS

**Describe the need for owner and rental rehabilitation based on the condition of the jurisdiction's housing.**

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**Estimate the number of housing units within the jurisdiction that are occupied by low or moderate income families that contain lead-based paint hazards. 91.205(e), 91.405**

Lead-based paint was banned from residential uses in 1978. All houses constructed before 1978 are therefore considered at risk for containing lead-based paint. HUD has made the elimination of housing units containing lead-based paint a priority, estimating that 90% of pre-1940 housing units, 80% of units constructed between 1940-1959, and 62% of units constructed from 1960-1979 contain lead-based paint.

Lead-based paint hazards pose the greatest risk for children, especially those under seven years of age. The poisoning of children from contact with lead-based paint has been recognized as a major public health problem by the Center for Disease Control (CDC). According to the CDC, lead is the number one environmental health hazard to American children. It is estimated that 10%-15% of all preschoolers in the United States are affected. Lead poisoning causes IQ reductions, reading and learning disabilities, decreased attention span, hyperactivity, and aggressive behavior.

The HUD IDIS-generated table above provides data on owner-occupied and renter-occupied units built before 1980, and housing units built before 1980 with children present. As the table indicates, though there are a higher proportion of renter-occupied units built prior to 1980, children are almost equally likely to be impacted by lead-based paint hazards in both owner- and renter-occupied units.

## Discussion

## MA-25 Public And Assisted Housing - 91.410, 91.210(b)

### Introduction

The Housing Authority for the City of Pueblo (HACP) operates 778 conventional public housing units for low-income, elderly, and disabled Pueblo residents. By working in partnership with the public and private sectors, the HACP provides families with housing choice and the opportunity to achieve self-sufficiency. The information generated by the eCon tool in IDIS is insufficient to adequately describe the City's public housing; therefore, the supplemental tables in the following sections were populated using data that was gathered from HACP.

### Totals Number of Units

|                               | Certificate | Mod-Rehab | Public Housing | Program Type |                |               |                                     |                            |            |
|-------------------------------|-------------|-----------|----------------|--------------|----------------|---------------|-------------------------------------|----------------------------|------------|
|                               |             |           |                | Vouchers     |                |               |                                     |                            |            |
|                               |             |           |                | Total        | Project -based | Tenant -based | Special Purpose Voucher             |                            |            |
|                               |             |           |                |              |                |               | Veterans Affairs Supportive Housing | Family Unification Program | Disabled * |
| # of units vouchers available | 30          | 215       | 901            | 1,501        | 0              | 1,501         | 263                                 | 0                          | 0          |
| # of accessible units         |             |           |                |              |                |               |                                     |                            |            |

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 37 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

### Describe the supply of public housing developments:

### Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Housing Authority for the City of Pueblo (HACP) operates 778 conventional public housing units for low-income, elderly, and disabled Pueblo residents. Per HACP's 2021 Annual Plan, it also manages 214 homes in the area. In addition, HACP is approved to administer 1,540 HCV/Section 8 units, including 60 HCV's specifically for veterans.

HUD's Real Estate Assessment Center conducts physical property inspections of properties that are owned, insured or subsidized by HUD, including public housing and multifamily assisted housing. The purpose is to ensure that public housing units are decent, safe, sanitary, and in good repair. Of the 16 multifamily units inspected, only one (Casa Del Sol) received a non-passing grade (grade received: 54c on 2/15/2023) in the past several years. Buildings must receive a 60 to be considered passing. However, other buildings received a "c" rating, meaning that at least one life-threatening health and safety deficiency was found. Non-life threatening health and safety deficiencies were found in four of the 12 multifamily developments inspected ('b' ratings). Four of the 16 buildings received a "c" rating, and five received a "b."

## Public Housing Condition

| Public Housing Development | Average Inspection Score |
|----------------------------|--------------------------|
|                            |                          |

Table 38 - Public Housing Condition

|                      |           |    |          |
|----------------------|-----------|----|----------|
| Uplands<br>Townhomes | 800249567 | 97 | 9/5/2024 |
|----------------------|-----------|----|----------|

|                   |           |    |           |
|-------------------|-----------|----|-----------|
| MINERAL<br>PALACE | 800003097 | 94 | 7/25/2024 |
|-------------------|-----------|----|-----------|

|                      |           |    |           |
|----------------------|-----------|----|-----------|
| Encino<br>Apartments | 800252129 | 93 | 7/24/2024 |
|----------------------|-----------|----|-----------|

|                |           |    |           |
|----------------|-----------|----|-----------|
| AZTECA<br>APTS | 800002926 | 90 | 7/16/2024 |
|----------------|-----------|----|-----------|

|                     |           |    |            |
|---------------------|-----------|----|------------|
| BETHLEHEM<br>SQUARE | 800002933 | 90 | 11/16/2023 |
|---------------------|-----------|----|------------|

|                     |           |      |           |
|---------------------|-----------|------|-----------|
| Fenix<br>Apartments | 800250485 | 75c* | 8/28/2023 |
|---------------------|-----------|------|-----------|

|                           |           |     |           |
|---------------------------|-----------|-----|-----------|
| Outlook Ridge Phase<br>II | 800244937 | 94b | 7/26/2023 |
|---------------------------|-----------|-----|-----------|

|                        |           |     |           |
|------------------------|-----------|-----|-----------|
| PRESERVE AT<br>BELMONT | 800073062 | 94c | 7/11/2023 |
|------------------------|-----------|-----|-----------|

## Housing ratings 1

| Property Name                | REMS<br>Property ID | Inspection<br>Score1 | Release<br>Date 1 |
|------------------------------|---------------------|----------------------|-------------------|
| Fearnow Group<br>Homes       | 800213150           | 83a                  | 5/10/2023         |
| Outlook Ridge<br>Apartments  | 800234870           | 99a*                 | 3/9/2023          |
| VILLAS AT PARK<br>WEST       | 800218893           | 88b*                 | 3/8/2023          |
| Casa Del Sol<br>Apartments   | 800248668           | 54c*                 | 2/15/2023         |
| PUEBLO VILLAGE<br>APARTMENTS | 800003147           | 91b*                 | 11/3/2022         |
| Villas at Park West<br>II    | 800226970           | 88c*                 | 8/16/2022         |
| UNION PLAZA<br>APARTMENTS    | 800003218           | 88b                  | 7/7/2022          |
| RICHMOND<br>APARTMENTS       | 800073137           | 95b                  | 6/24/2022         |

## Housing ratings 2

### Describe the restoration and revitalization needs of public housing units in the jurisdiction:

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

### Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

The HACP has established the following strategy in its 5-Year PHA Plan to improve the living environment of public housing residents:

- Implement measure to deconcentrate poverty by bringing higher income public housing households into lower income developments;

- Implement measures to promote income missing in public housing by assuring access for lower-income families into higher-income developments;
- Implement public housing security improvements, such as increased lighting and security officers in high-crime areas.

In addition, the HACP administers the Family Self-Sufficiency Program (FSS), in which families sign a 5-year contract to become self-sufficient. The program allows families to set aside a portion of rent increases, as a result of increases in earned income during the contract, into an escrow account. At the end of the contract families receive the escrow account to use as a down payment on the purchase of a home or for deposits and other fees associated with renting in the private market. Homeownership counseling is also offered to residents enrolled in the program. As of October, 2020, there were a total of 47 FSS participants; 29 in public housing, and 18 in Section 8.

#### **Discussion:**

Explanation of Inspection Scores in Public Housing Condition Table:

- An asterisk (\*) indicates that health and safety (H&S) deficiencies were found with respect to smoke detectors.
- The lower-case letter indicates whether or not other kinds of H&S deficiencies were observed, as follows:

- a) The letter "a" is given if no health and safety deficiencies were observed other than for smoke detectors.
- b) The lower-case letter "b" is given if one or more non-life threatening H&S deficiencies, but no exigent/fire safety H&S deficiencies were observed other than for smoke detectors.
- c) The lower-case letter "c" is given if one or more life threatening exigent/fire safety (calling for immediate attention or remedy) H&S deficiencies were observed.

## MA-30 Homeless Facilities and Services - 91.410, 91.210(c)

### Introduction

This section of the Consolidated Plan lists and describes housing facilities and services available to meet the needs of the homeless population in the City of Pueblo. The City supports the cooperative efforts and activities of local service providers through its membership in the Colorado Balance of State Continuum of Care (BoS CoC). The BoS CoC works to address homelessness and the priority needs of homeless individuals and families, including homeless subpopulations. To the extent possible, the City also assists agencies seeking federal, state, and private funding for housing and activities related to homelessness and those at risk of homelessness.

### Facilities Targeted to Homeless Persons

|                                         | Emergency Shelter Beds          |                                    | Transitional Housing Beds | Permanent Supportive Housing Beds |                   |
|-----------------------------------------|---------------------------------|------------------------------------|---------------------------|-----------------------------------|-------------------|
|                                         | Year Round Beds (Current & New) | Voucher / Seasonal / Overflow Beds | Current & New             | Current & New                     | Under Development |
| Households with Adult(s) and Child(ren) | 96                              | 0                                  | 0                         | 35                                | 0                 |
| Households with Only Adults             | 96                              | 0                                  | 13                        | 9                                 | 25                |
| Chronically Homeless Households         | 0                               | 0                                  | 0                         | 0                                 | 0                 |
| Veterans                                | 0                               | 0                                  | 0                         | 0                                 | 10                |
| Unaccompanied Youth                     | 0                               | 10                                 | 0                         | 0                                 | 0                 |

**Table 39 - Facilities Targeted to Homeless Persons**

**Data Source Comments:** Source: 2025 PIT BoS CoC

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

**Affordable Housing:**

For those homeless or low-income citizens who are seeking to obtain rental housing or to purchase a home, the City of Pueblo has several programs that assist with education on home purchase, and the Colorado Housing and Finance Authority provides down payment assistance.

In addition to the Housing Authority programs described in Section MA-25, nonprofit organizations throughout Pueblo help boost affordable housing: Nancy's Place offers youth aging out of foster care an affordable housing option; Neighborworks of Southern Colorado offers homebuyer education and down payment assistance; Posada offers tenant-based rental assistance (TBRA) funding through the HOME program.

**Education and Employment:**

Education, training, and employment opportunities are available through Pueblo Corporate College's Mobile Learning Lab, Pueblo City-County Library, Re-Hire Colorado, and the Colorado Workforce Center. In addition, the Boys and Girls Club offers a workforce development initiative to prepare high school students for employment, and Pueblo Diversified Industries provides job training for the developmentally disabled.

**Food and Meals:**

A number of organizations provide meals and food assistance to households facing food insecurity, including homeless households, including: Catholic Charities, Pueblo Community Soup Kitchen, Pueblo Food Project, Cooperative Care Center, Care and Share, Salvation Army, and the Center Toward Self-Reliance. The Senior Resource Development Agency (SRDA) provides food assistance, as does the USDA Food Distribution Program.

**Health Counseling:**

The following organizations provide healthcare counseling, including general health, general counseling, mental health, substance abuse, maternal, and reproductive health services that complement services targeted to homeless persons: Health Solutions, Friendly Harbor, Crossroads' Managed Care, Catholic Charities, YWCA, and Pueblo Community Health Center. UC Health University of Colorado Hospital also has programs dedicated toward assisting unhoused people.

**Transportation:**

The City of Pueblo's public transportation provider covers most of the City; however, stakeholders identified transportation as a barrier for low-income households to access services and travel to and/or

from employment opportunities. The Senior Resource Development Agency (SRDA) offers a transportation program to provide the elderly with rides to medical appointments, grocery shopping, recreation, and legal and social services.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

The following presents an inventory of service providers dedicated to assisting the homeless within the City of Pueblo:

Posada:

- Provides an 11-unit emergency shelter and supportive services to families with children. Case workers provide assistance and referrals for shelter, food, employment assistance, and review options for low-income housing, as well as identifying community resources and programs to obtain self-sufficiency.
- Sunset Motel provides a 16-unit SRO for seniors
- Nancy's Place provides an affordable housing option for youth aging out of foster care with a 7-unit, single-room occupancy facility

YWCA:

- Provides short-term emergency shelter for survivors of domestic violence.

The Pueblo Shelter

- Provides a 95-bed emergency shelter to single adult men and women

Health Solutions

- The Right Place provides permanent supportive housing (30-35 units)

Crazy Faith Ministries

- Emergency shelter

Pueblo Rescue Mission: Provides 95-bed emergency shelter to single adult men and women.

Nancy's Place: Provides an affordable housing option for youth aging out of foster care via a 7-unit, single-room occupancy facility.

## **MA-35 Special Needs Facilities and Services - 91.410, 91.210(d)**

### **Introduction**

The special needs population includes individuals having mobility impairments, disabilities, or that require supportive services. Typically, this population has severe or persistent mental illness, development and/or physical disabilities. Several organizations provide facilities and services for special needs populations in the City of Pueblo.

Various supportive housing needs of the non-homeless have been identified by service providers who were interviewed during the Consolidated Plan process. Cited needs include home repair and maintenance for the elderly, accessibility improvements, housing for people with mental illness and disabilities, mental health and addiction services, and affordable housing for all sub-populations.

**Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

Supportive housing is defined as living units that provide a planned services component with access to a wide range of services needed for the resident to achieve personal goals. Various populations with special needs require supportive housing. For some individuals, supportive housing is needed because they are unable to undertake the activities of daily living without assistance. The specific needs of local special needs subpopulations are described in NA-45, Non-Homeless Special Needs Assessment.

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

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PLAN\_SECTION\_ID=[1350402000]>

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

The City plans to undertake the following activities within the next year to address identified housing and supportive service needs for the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, and public housing residents:

- Support the development of least-restrictive and affordable housing for developmentally disabled persons and support the expansion of services to developmentally disabled persons;
- Support the development of housing adaptable to the needs of physically disabled persons and modify housing to meet the needs of physically disabled; and
- Continue to work with service agencies that provide assistance to the developmentally and physically disabled community, as well as agencies providing services to youth and elderly populations.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

See above.

## **MA-40 Barriers to Affordable Housing - 91.410, 91.210(e)**

### **Describe any negative effects of public policies on affordable housing and residential investment**

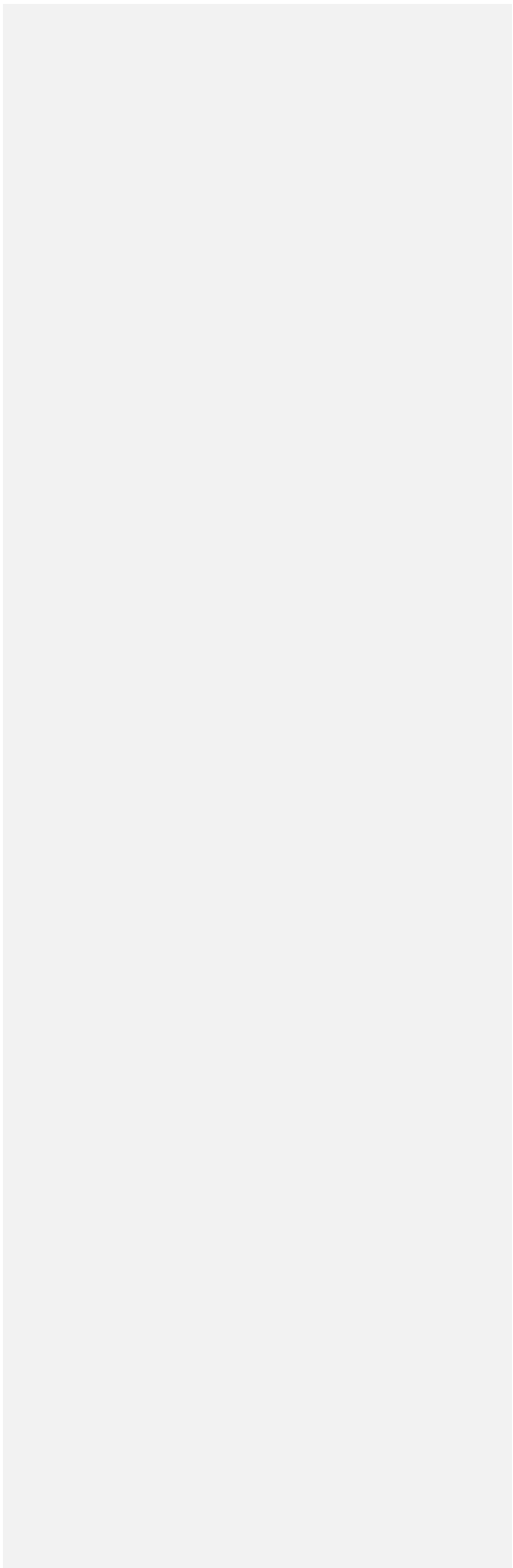
The City is preparing an Analysis of Impediments to Fair Housing Choice concurrently with the Consolidated Plan for 2025. This AI noted that as housing prices rise relative to income, the City must continue its work in creating conditions for efficient development of new housing stock.

Unleashing market-rate housing can ease pressure on housing costs down the economic spectrum, as higher-income residents are often attracted to newer developments and therefore do not displace incumbent residents or outbid lower-income competitors for existing housing stock. However, new building permits dropped significantly after 2021, according to the Pueblo Comprehensive Plan and the Housing Needs Assessment, updated in 2024.

To facilitate efficiency in developing new housing stock and helping residence afford housing, the City's action plan includes:

- Ensuring that municipal zoning ordinances relax restrictions on multifamily housing where appropriate, especially in infill areas
- Exploring land-use designations for high-density housing
- Decreasing construction costs by modernizing codes
- Reforming acquisition and disposition policies of city-owned real estate to encourage development
- Streamlining city/county coordination for speedier development processes

This is not a comprehensive list, but rather examples of the most targeted ways in which the City and County of Pueblo are working to update existing public policies and encourage residential investment over the next five years.



## MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

### Introduction

The largest number of workers who live in the City, according to the Business Activity table below, are employed in Education and Health Care Services (26%). This is consistent with the types of employment opportunities available for City residents; major employers in the area include Colorado State University-Pueblo, Pueblo Community College, Colorado Technical University, Intellitec College, as well as St. Mary Corwin and Parkview Hospitals.

### Economic Development Market Analysis

#### Business Activity

| Business by Sector                            | Number of Workers | Number of Jobs | Share of Workers % | Share of Jobs % | Jobs less workers % |
|-----------------------------------------------|-------------------|----------------|--------------------|-----------------|---------------------|
| Agriculture, Mining, Oil & Gas Extraction     | 351               | 50             | 1                  | 0               | -1                  |
| Arts, Entertainment, Accommodations           | 5,143             | 5,468          | 16                 | 18              | 2                   |
| Construction                                  | 2,514             | 1,350          | 8                  | 4               | -4                  |
| Education and Health Care Services            | 8,032             | 10,934         | 26                 | 36              | 10                  |
| Finance, Insurance, and Real Estate           | 1,449             | 1,366          | 5                  | 5               | 0                   |
| Information                                   | 424               | 423            | 1                  | 1               | 0                   |
| Manufacturing                                 | 2,891             | 1,643          | 9                  | 5               | -4                  |
| Other Services                                | 1,177             | 1,137          | 4                  | 4               | 0                   |
| Professional, Scientific, Management Services | 1,627             | 835            | 5                  | 3               | -2                  |
| Public Administration                         | 0                 | 0              | 0                  | 0               | 0                   |
| Retail Trade                                  | 5,360             | 5,947          | 17                 | 20              | 3                   |
| Transportation and Warehousing                | 1,059             | 433            | 3                  | 1               | -2                  |
| Wholesale Trade                               | 1,174             | 617            | 4                  | 2               | -2                  |
| Total                                         | 31,201            | 30,203         | --                 | --              | --                  |

**Table 40 - Business Activity**

**Data Source:** 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)



## Labor Force

|                                                |        |
|------------------------------------------------|--------|
| Total Population in the Civilian Labor Force   | 49,085 |
| Civilian Employed Population 16 years and over | 45,320 |
| Unemployment Rate                              | 7.65   |
| Unemployment Rate for Ages 16-24               | 20.56  |
| Unemployment Rate for Ages 25-65               | 4.45   |

**Table 41 - Labor Force**

Data Source: 2016-2020 ACS

| Occupations by Sector                            | Number of People |
|--------------------------------------------------|------------------|
| Management, business and financial               | 8,180            |
| Farming, fisheries and forestry occupations      | 1,695            |
| Service                                          | 5,995            |
| Sales and office                                 | 10,715           |
| Construction, extraction, maintenance and repair | 4,405            |
| Production, transportation and material moving   | 2,765            |

**Table 42 – Occupations by Sector**

Data Source: 2016-2020 ACS

## Travel Time

| Travel Time        | Number        | Percentage  |
|--------------------|---------------|-------------|
| < 30 Minutes       | 34,953        | 81%         |
| 30-59 Minutes      | 5,859         | 14%         |
| 60 or More Minutes | 2,213         | 5%          |
| <b>Total</b>       | <b>43,025</b> | <b>100%</b> |

**Table 43 - Travel Time**

Data Source: 2016-2020 ACS

## Education:

Educational Attainment by Employment Status (Population 16 and Older)

| Educational Attainment         | In Labor Force    |            | Not in Labor Force |
|--------------------------------|-------------------|------------|--------------------|
|                                | Civilian Employed | Unemployed |                    |
| Less than high school graduate | 2,530             | 410        | 3,160              |

| Educational Attainment                      | In Labor Force    |            | Not in Labor Force |
|---------------------------------------------|-------------------|------------|--------------------|
|                                             | Civilian Employed | Unemployed |                    |
| High school graduate (includes equivalency) | 9,890             | 810        | 6,465              |
| Some college or Associate's degree          | 14,750            | 1,045      | 5,760              |
| Bachelor's degree or higher                 | 9,115             | 250        | 1,975              |

**Table 44 - Educational Attainment by Employment Status**

Data Source: 2016-2020 ACS

#### Educational Attainment by Age

|                                           | Age       |           |           |           |         |
|-------------------------------------------|-----------|-----------|-----------|-----------|---------|
|                                           | 18–24 yrs | 25–34 yrs | 35–44 yrs | 45–65 yrs | 65+ yrs |
| Less than 9th grade                       | 190       | 365       | 585       | 695       | 1,125   |
| 9th to 12th grade, no diploma             | 1,635     | 1,465     | 1,190     | 1,810     | 1,430   |
| High school graduate, GED, or alternative | 3,530     | 4,605     | 3,830     | 8,725     | 6,455   |
| Some college, no degree                   | 3,825     | 4,340     | 3,310     | 7,040     | 5,505   |
| Associate's degree                        | 645       | 1,885     | 1,560     | 3,465     | 1,570   |
| Bachelor's degree                         | 470       | 2,465     | 2,085     | 3,480     | 2,465   |
| Graduate or professional degree           | 95        | 670       | 980       | 1,670     | 1,755   |

**Table 45 - Educational Attainment by Age**

Data Source: 2016-2020 ACS

#### Educational Attainment – Median Earnings in the Past 12 Months

| Educational Attainment                      | Median Earnings in the Past 12 Months |
|---------------------------------------------|---------------------------------------|
| Less than high school graduate              | 24,401                                |
| High school graduate (includes equivalency) | 29,600                                |
| Some college or Associate's degree          | 32,281                                |
| Bachelor's degree                           | 42,381                                |
| Graduate or professional degree             | 54,964                                |

**Table 46 – Median Earnings in the Past 12 Months**

Data Source: 2016-2020 ACS

#### Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The major employment sector within the City of Pueblo is Education and Health Care Services, providing 36% of the jurisdiction's jobs. Jobs in these sectors correspond to the presence of Colorado State

University-Pueblo, Pueblo Community College, Colorado Technical University, Intellitec College, and two school districts. In terms of health care employment, there are two major hospitals in the area, St. Mary Corwin and Parkview, as well as the Veterans Affairs Eastern Colorado Health Care System and the Colorado Mental Health Institute.

The Retail Trade, and Arts, Entertainment, and Accommodations Sectors are the next largest employment sectors, providing 20% and 18% of jobs within the City, respectively. There are several commercial centers in the City, ranging from the downtown area, with various shops, boutiques and services, to neighborhood commercial corridors that provide services and retail needs to residents that live nearby.

**Describe the workforce and infrastructure needs of the business community:**

The largest negative values in the Jobs Less Workers column of the Business Activity Table, which reflects an oversupply of labor for the sector (more workers than jobs), are within Manufacturing and Construction.

This indicates commuter populations working in these jobs, traveling from the City for opportunities in the manufacturing and construction sectors, which in turn indicates a shortage of these jobs within the City.

The largest positive value in the Jobs Less Workers column, which signifies importing workers, is within Education and Health Care Services. This indicates that workers are traveling to the City for opportunities in this sector, which in turn suggests a surplus of these jobs within the City.

The tables above indicate commute times have risen for a small percentage of the workforce: In 2020, 14% of commuters took 30-59 minutes to commute to work, and 5% took more than an hour -- an increase from the 2015 numbers, which were 13% and 4%, respectively. The majority took less than 30 minutes for their commute, indicating reasonable transportation infrastructure.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

1) The Pueblo Community Health Center (PCHC) has built a 62,500 square foot medical clinic that includes health, mental health, pharmacy, and lab services. This \$25 million project is in an LMI area of the City (East 8th Street/Lacrosse) and brought with it much-needed revitalization and economic stimulus.

2) Fomcore, a manufacturer of soft seating furniture, opened in 2024 at 200 Greenhorn Drive and added 85 jobs to Pueblo. The project included \$1.74 from the city's half-cent sales tax fund, and a \$10 million investment overall.

3) CR Minerals built a \$15 million facility in Pueblo's St. Charles Industrial Park in 2017 as part of their Phase 1 development, and expanded their facility with approximately \$11 million capital investment, adding eight new full-time jobs in 2023.

4) Evraz Rail Mill – Pueblo Urban Renewal issued \$91 million in bonds to help construct Evraz's new \$500 million Rail Mill, the first solar-powered steel mill in the country. The project broke ground in 2022 and provided for 1,100 jobs.

#### **How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

The data in the above tables indicates an unemployment rate of 7.65% in Pueblo County in 2020, slightly below the national unemployment rate of 8.1% that year. Education attainment levels show the majority of employed individuals had some college or associates degree (14,750, or 30%), followed by high school diploma or equivalent (9,890, or 20.1%), then bachelor's degree (9,115, or 18.6%).

By far the largest positive value in the Jobs Less Workers column, which signifies importing workers, also occurred within Education and Health Care Services; this suggests that the current workforce does not have training or education that match the employment opportunities in the City, and that additional training or retraining opportunities are needed and/or may not be utilized by currently unemployed residents. While the biggest portion of employed individuals had some college or an associate's degree, these in-demand sectors often require a minimum of a bachelor's degree.

The Retail Trade, and Arts, Entertainment, and Accommodations Sectors are the next largest employment sectors, providing 20% and 18% of jobs within the City, respectively. These job categories are generally among the lower paid of the various categories.

#### **Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

Pueblo Corporate College's Mobile Learning Labs are sponsored through the U.S. Department of Labor, providing portable classrooms with instructors to deliver skills development and training.

Pueblo City-County Library District's Adult Learning Program provides adults (18 and up) with opportunities to increase basic skills in reading, writing, and math, prepare for High School Equivalency

(HSE) tests, learn English, improve/increase civic engagement, and develop the skills to transition to further education and jobs.

ReHire Colorado is a transitional employment program that is administered by Colorado Department of Human Services. The goal of ReHire Colorado is to help individuals with barriers to employment re-enter the workforce by combining wage-paid work, job skills training, and supportive services.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

Yes

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

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PLAN\_SECTION\_ID=[1370705000]>

**Discussion**

## **MA-50 Needs and Market Analysis Discussion**

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

The City defines "concentration" as areas where high percentages in a census tract have one or more housing problems. The following data by census tract is based on housing quality indicators (selected conditions). Selected conditions include the following: (1) the lack of complete plumbing facilities, (2) the lack of complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%.

The map below ("Concentration of Housing Problems") indicates areas where high concentrations of housing problems occur among low-income households.

### **Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

For the purposes of this Consolidated Plan, concentration is defined as a census tract where a minority group's population is ten percentage points higher in that census tract than its proportion in the City's population.

The City's population is 48.4% Hispanic. An area of concentration of Hispanic residents will be any Census tract that is at least 58.4% Hispanic. See the attached map ("Ethnicity Map 1") for population concentrations.

### **What are the characteristics of the market in these areas/neighborhoods?**

Home values in these areas/neighborhoods tend to be lower than the City Median. In addition, the housing stock tends to be older (constructed prior to 1979), meaning that these neighborhoods tend to have concentrations of housing problems due to age-related deterioration and a corresponding need for rehabilitation.

### **Are there any community assets in these areas/neighborhoods?**

The community assets include local businesses, parks and community facilities, multiple educational facilities, and several medical complexes. The following is a list of assets and resources in different neighborhoods.

#### West Park/Hyde Park

- Schools: Chavez Preparatory Academy/Dolores Huerta Academy, Charter School (K-8, High School)
- Irving Elementary School (D60)

- Medical: Park West Medical Center, Kaiser Permanente, Pueblo Cardiology Center
- Government: Social Security Office
- Recreational: YMCA, Wildhorse Park, Hyde Park Park
- Business: Realty Offices, Convenience Store, Dollar General, Carwash

#### Eastside

- Schools: Bradford and Parkview Elementary Schools, Fountain Magnet School, Risley Middle School (D60)
- Medical: Pueblo Community Health Center
- Recreation: Plaza Verde Park, Mitchell Park, El Centro Quinta Sol Park, Portland Park
- Business: Double J Meat Market, Laundry, Carwash, Vehicle Service Centers, Convenience Stores, Three Bars, Chicken and Cone, Locksmith, Pawn Shop.
- Library: Lucero Library
- Government: Food Pantry, Pueblo County Human Services – Weatherization and Commodities Offices

#### Bessemer

- Schools: Minnequa Elementary, Bessemer Elementary School, Central High School, John Newman Catholic School
- Medical: Saint Mary-Corwin Hospital
- Recreation: Bessemer Park, Stauter Field, Raigoza Park, Lake Minnequa Park and Open Space
- Business: Restaurants, used carsales, auto repair centers, carwash, bank, barber, Mountain States Communications, Evraz Steel Mill, ABC Rail, Gagliano's Market, Zolesman Bakery
- Government: none
- Community Development: NeighborWorks of Southern Colorado

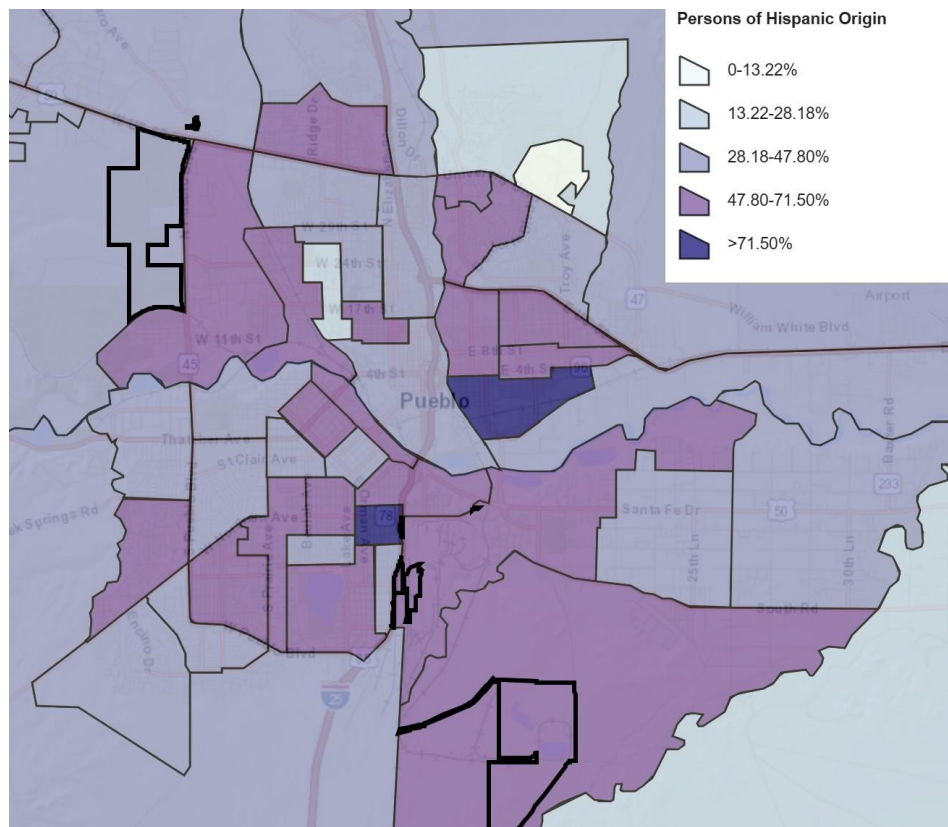
#### Belmont

- Schools: Spann, Franklin, and Belmont Elementary Schools, Heaton Middle School, East High School
- Medical: Rocky Mountain Eye Center, Health Solutions Medical Campus
- Recreational: Belmont Park, Drew Dix Park
- Library: Barkman Library
- Government: none
- Business: Belmont Shopping Center, Big R Ranch Supply, Save-A-Lot grocery, McDonalds, Wendy's, Subway, Walgreens, laundry, bank,

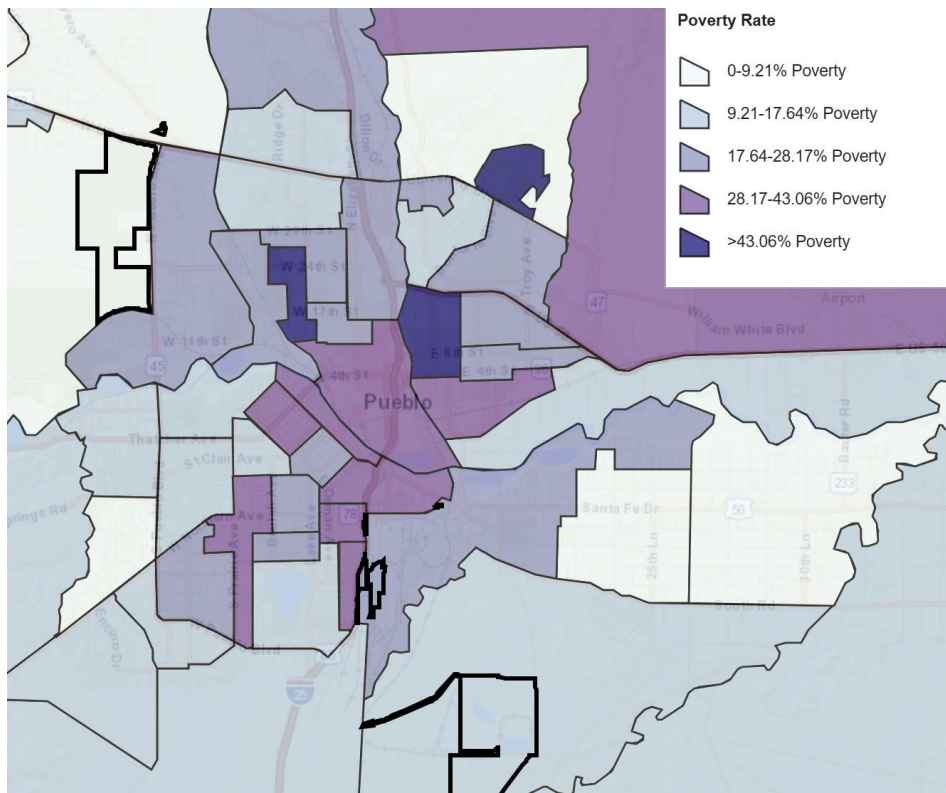
**Are there other strategic opportunities in any of these areas?**

Housing and transportation costs typically consume about half of the average household budget, offering a useful evaluative tool to determine strategic opportunities such as where to locate resources or facilities and areas of potential economic distress. In the City of Pueblo, the most significant housing issues are cost burden and severe cost burden. According to CHAS data, 14.2% of City households are cost burdened and 13.1% are severely cost burdened. Given a lack of decent, affordable housing options, the area's lower-income households often face a choice between deficient, substandard housing and cost burden.

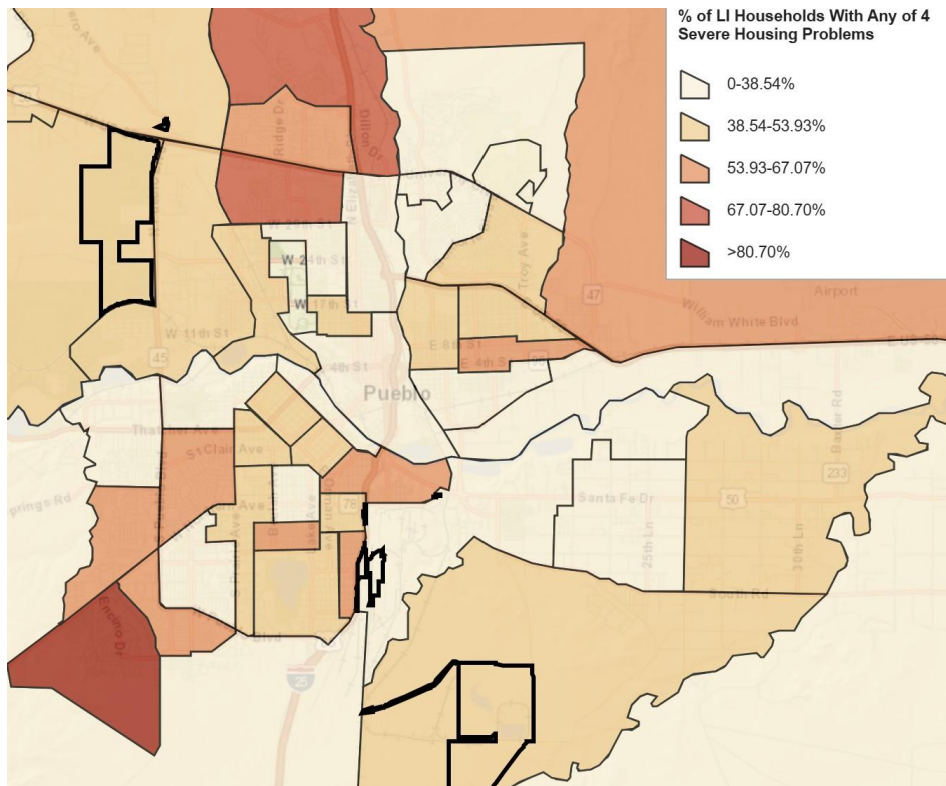
Information obtained during public meetings and the public survey indicate that low-income residents have problems accessing transportation and amenities, including employment centers, grocery stores, and childcare. These areas present strategic opportunities for residential, commercial and/or mixed-use development, including infrastructure and public facilities improvements.



**Ethnicity map 1**



**Poverty concentration**



**Concentration of housing problems**

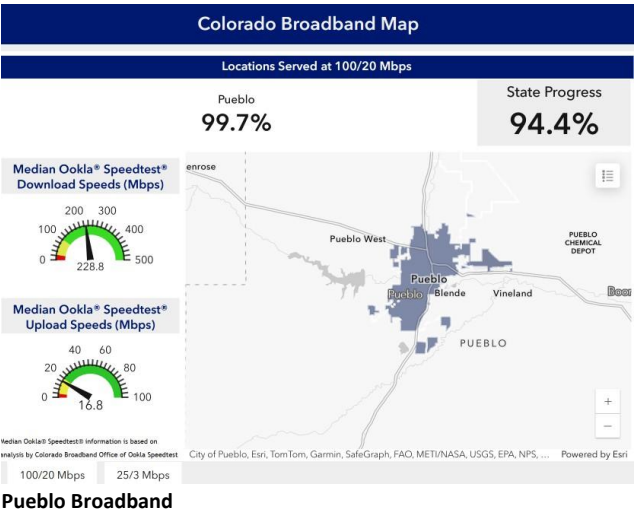
**MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

**Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

Broadband is accessible in 95.7% of Pueblo County and 99.7% of the city of Pueblo, according to the Colorado Broadband Office.

**Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

The city of Pueblo's website lists its internet providers as: AT&T, Xfinity, CenturyLink, HughesNet, and T-Mobile Fiber. According to ACS data from 2023, 85.1% of households have an internet subscription. That percentage is lower than the national rate of 91.2%, indicating that although Pueblo has a variety of internet providers, and broadband is almost universally available in the county and city, residents may struggle to afford internet in their homes.



## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

The Emergency Services Bureau of the Pueblo County Sheriff's Office updated its legally mandated Natural Hazard Mitigation Plan for Pueblo County, Colorado in 2024. The plan identified hazard risk/vulnerability rankings of potential hazards for Pueblo County and its jurisdictions, including the City of Pueblo. Thunderstorms, lightning, and wildland fires were identified as potential natural hazards with a very high likelihood of occurrence. Droughts, floods, hailstorms, tornados, and zoonotic disease were also identified as potential hazards with a high likelihood of occurrence. The hazards listed are common to the high plains desert, but climate change may affect the frequency of such conditions.

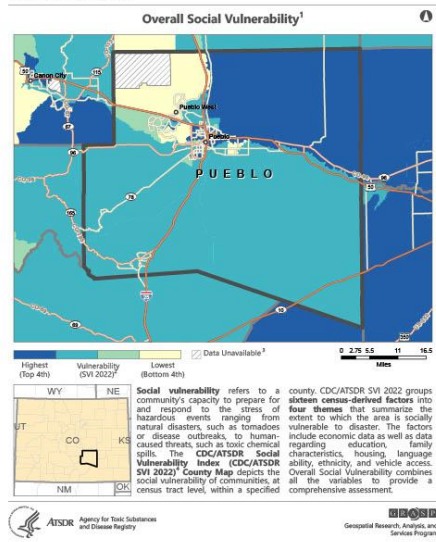
### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

In all of these cases, damage or loss sustained as a result of the disaster is likely to leave low-income households less likely to have resources or access to resources to aid in resiliency and recovery. Social vulnerability refers to populations that are particularly vulnerable to disruption and health problems as a result of natural disasters, human-made disasters, climate change, and extreme weather.

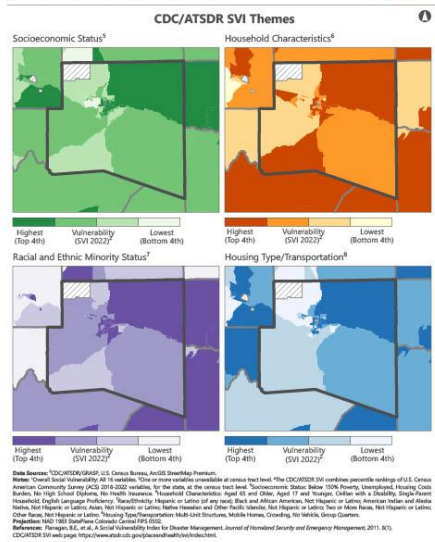
The Hazard Overview below utilizes the Social Vulnerability Index (SVI), updated in 2022, to help flag areas that will be in greatest need of support and recovery assistance in the case of a disaster or extreme weather event. The index is comprised of four categories of vulnerability—socioeconomic status, household composition and disability, minority status and language, and housing and transportation. Areas with high and moderate to high social vulnerability may not have adequate funds to evacuate before or recover from a disaster. Much of the northeast quadrant of the county is designated as high-risk, as are a number of neighborhoods within the city. High risk areas correspond to the following neighborhoods:

- Northwest - Park West, Hyde Park
- Central and Eastern – Northside, Downtown, Grove
- Southeast - Bessemer and Lake Minnequa
- Northeast – Belmont, Eastwood Heights, East Side, Lower East Side

CDC/ATSDR Social Vulnerability Index 2022  
PUEBLO COUNTY, COLORADO



CDC/ATSDR SVI 2022 – PUEBLO COUNTY, COLORADO



Hazard Overview 1

## Strategic Plan

### SP-05 Overview

#### Strategic Plan Overview

The following Strategic Plan identifies funding priorities and program goals in which the City will invest over the next five years. The goals were developed based upon public and key stakeholder input and quantitative data from the Needs Assessment and Market Analysis. The identified priorities include:

- Affordable Housing
- Public Services, including Services for Homelessness
- Public Infrastructure and Facilities
- Economic Development and Community Revitalization
- Fair Housing Education and Outreach
- Administration and Planning

## SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

### Geographic Area

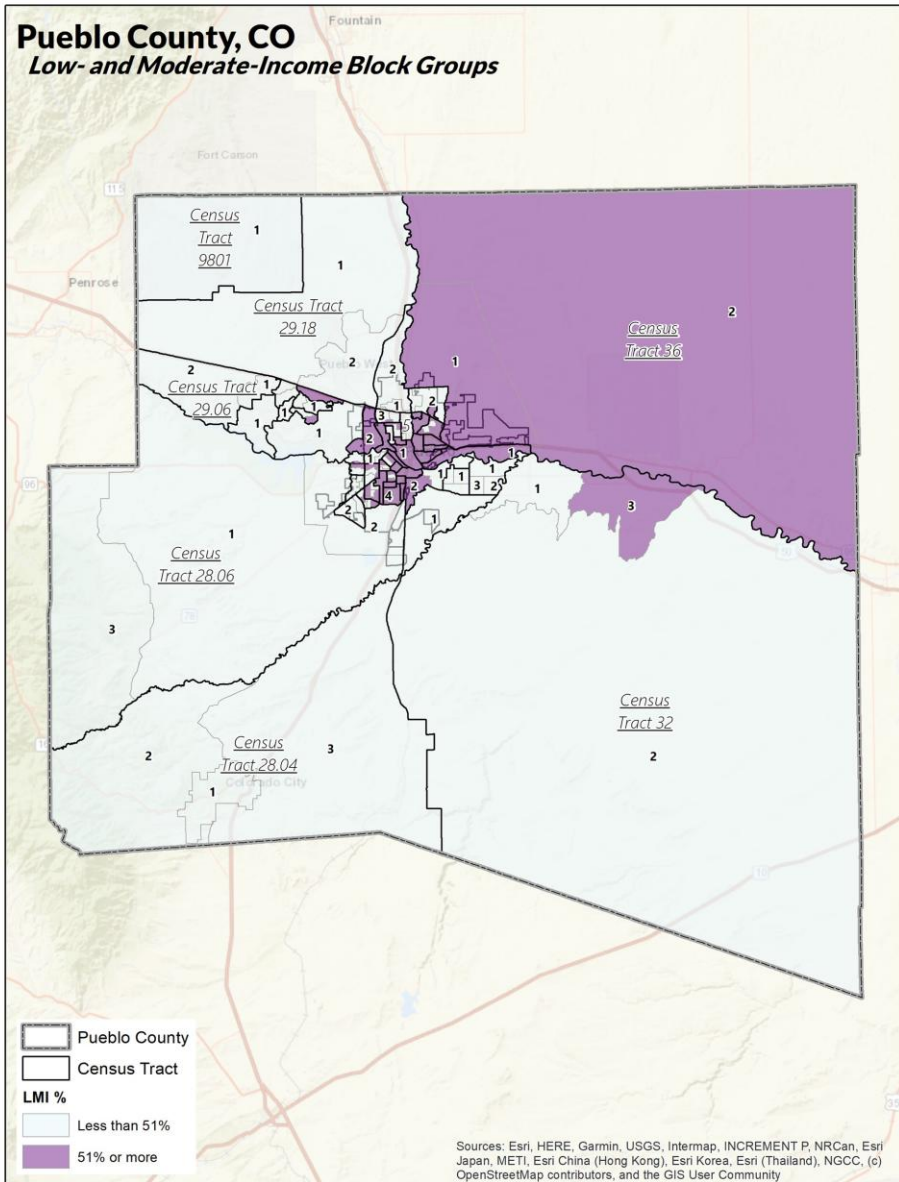
Table 47 - Geographic Priority Areas

|   |                                                                                                                      |            |
|---|----------------------------------------------------------------------------------------------------------------------|------------|
| 1 | Area Name:                                                                                                           | Citywide   |
|   | Area Type:                                                                                                           | Other      |
|   | Other Target Area Description:                                                                                       | Other      |
|   | HUD Approval Date:                                                                                                   |            |
|   | % of Low/ Mod:                                                                                                       |            |
|   | Revital Type:                                                                                                        |            |
|   | Other Revital Description:                                                                                           |            |
|   | Identify the neighborhood boundaries for this target area.                                                           |            |
|   | Include specific housing and commercial characteristics of this target area.                                         |            |
|   | How did your consultation and citizen participation process help you to identify this neighborhood as a target area? |            |
|   | Identify the needs in this target area.                                                                              |            |
|   | What are the opportunities for improvement in this target area?                                                      |            |
|   | Are there barriers to improvement in this target area?                                                               |            |
| 2 | Area Name:                                                                                                           | Countywide |
|   | Area Type:                                                                                                           | Other      |
|   | Other Target Area Description:                                                                                       | Other      |
|   | HUD Approval Date:                                                                                                   |            |
|   | % of Low/ Mod:                                                                                                       |            |
|   | Revital Type:                                                                                                        |            |
|   | Other Revital Description:                                                                                           |            |
|   | Identify the neighborhood boundaries for this target area.                                                           |            |
|   | Include specific housing and commercial characteristics of this target area.                                         |            |
|   | How did your consultation and citizen participation process help you to identify this neighborhood as a target area? |            |
|   | Identify the needs in this target area.                                                                              |            |
|   | What are the opportunities for improvement in this target area?                                                      |            |
|   | Are there barriers to improvement in this target area?                                                               |            |

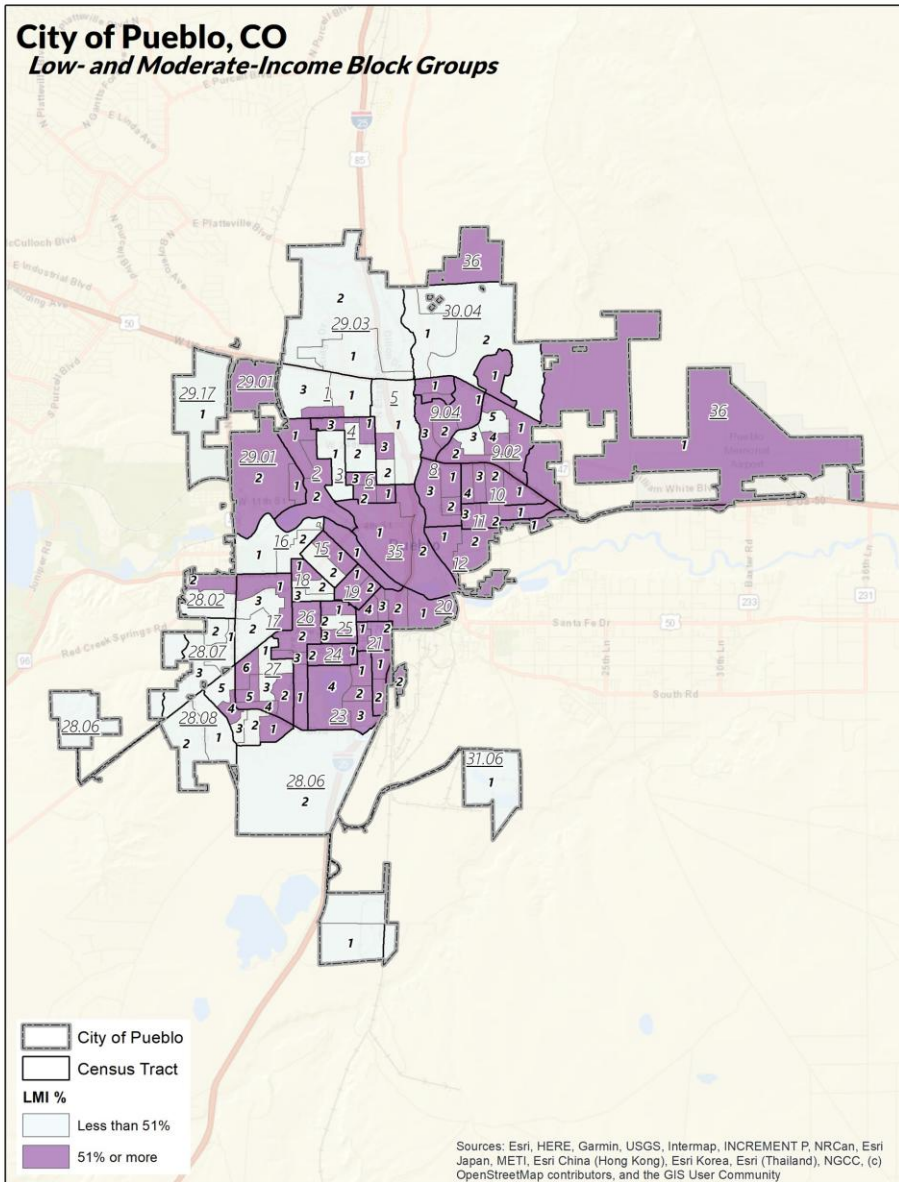
### General Allocation Priorities

Describe the basis for allocating investments geographically within the state

There are no specially identified target areas for allocating CDBG and HOME resources. CDBG funds will be expended within the City of Pueblo while HOME funds will be used citywide as well as in the County. HOME funds are divided between the City and County. City HOME funds are spent within the City while County funds could be spent in either the City or County depending on the projects being funded. The following maps, created using low- and moderate-income data from HUD, indicates the CDBG-eligible areas within the County and City where at least 51% of the population qualifies as low- or moderate-income.



**LMI Map**



**LMI Map 2**

## SP-25 Priority Needs - 91.415, 91.215(a)(2)

### Priority Needs

Table 48 – Priority Needs Summary

|   |                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <b>Priority Need Name</b>        | Affordable Housing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|   | <b>Priority Level</b>            | High                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|   | <b>Population</b>                | Extremely Low<br>Low<br>Moderate<br>Middle<br>Large Families<br>Families with Children<br>Elderly<br>Public Housing Residents<br>Chronic Homelessness<br>Individuals<br>Families with Children<br>Mentally Ill<br>Chronic Substance Abuse<br>veterans<br>Persons with HIV/AIDS<br>Victims of Domestic Violence<br>Unaccompanied Youth<br>Elderly<br>Frail Elderly<br>Persons with Mental Disabilities<br>Persons with Physical Disabilities<br>Persons with Developmental Disabilities<br>Persons with Alcohol or Other Addictions<br>Persons with HIV/AIDS and their Families<br>Victims of Domestic Violence |
|   | <b>Geographic Areas Affected</b> | Other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|   | <b>Associated Goals</b>          | Acquisition and rehabilitation of housing<br>Financial assistance to renters and owners<br>New construction of affordable housing<br>Preserve existing affordable units (rehab)                                                                                                                                                                                                                                                                                                                                                                                                                                |

|   |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | <b>Description</b>                 | This priority need include: acquisition and rehabilitation of housing, rehabilitation/reconstruction of single and multi-family housing; energy efficiency improvements; accessibility modifications; lead based paint hazard testing and abatement; housing services including down payment assistance and/or and homebuyer education programs; Minor Repairs; new construction of single and multi-family housing; acquisition and disposition of property; and preservation of affordable units.                                                                                                                                                 |
|   | <b>Basis for Relative Priority</b> | High housing costs reduce economic opportunities and access to prosperity. The NA section reveals high rates of cost burden and severe cost burden among lower-income households as well as older housing stock that is in need of repairs and rehabilitation.                                                                                                                                                                                                                                                                                                                                                                                      |
| 2 | <b>Priority Need Name</b>          | Public Services including Services for Homeless                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|   | <b>Priority Level</b>              | High                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|   | <b>Population</b>                  | Extremely Low<br>Low<br>Moderate<br>Middle<br>Large Families<br>Families with Children<br>Elderly<br>Public Housing Residents<br>Chronic Homelessness<br>Individuals<br>Families with Children<br>Mentally Ill<br>Chronic Substance Abuse<br>veterans<br>Persons with HIV/AIDS<br>Victims of Domestic Violence<br>Unaccompanied Youth<br>Elderly<br>Frail Elderly<br>Persons with Mental Disabilities<br>Persons with Physical Disabilities<br>Persons with Developmental Disabilities<br>Persons with Alcohol or Other Addictions<br>Persons with HIV/AIDS and their Families<br>Victims of Domestic Violence<br>Non-housing Community Development |

|   |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---|------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | <b>Geographic Areas Affected</b>   | Other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|   | <b>Associated Goals</b>            | Provide housing and services to homeless<br>Provide public services to non-homeless population                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|   | <b>Description</b>                 | Housing and services for homeless and near homeless include outreach, emergency, transitional and permanent supportive housing, Rapid Re-Housing, supporting services and rental assistance<br><br>Other public services that are needed include: housing and services for persons with HIV/AIDS; services for persons with physical, developmental and/or intellectual disabilities; employment and workforce development; screening for lead-based paint hazards; housing counseling; neighborhood clean-up programs; crime awareness and prevention programs; transportation; health and mental health services; services for persons recovering from addiction; youth programs, food banks and other food-related services; childcare and related services; senior programs and related services; legal services; and financial literacy. |
|   | <b>Basis for Relative Priority</b> | There continues to be a need for services that improve conditions and/or opportunities for the elderly, youth, low-income persons, persons with HIV/AIDS, and other vulnerable populations.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 3 | <b>Priority Need Name</b>          | Public Infrastructure and Facilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|   | <b>Priority Level</b>              | High                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|   | <b>Population</b>                  | Extremely Low<br>Low<br>Moderate<br>Elderly<br>Frail Elderly<br>Persons with Mental Disabilities<br>Persons with Physical Disabilities<br>Non-housing Community Development                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|   | <b>Geographic Areas Affected</b>   | Other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|   | <b>Associated Goals</b>            | Improve and maintain public infrastructure and fac                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|   |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

|   |                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---|------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | <b>Description</b>                 | Public facilities include neighborhood facilities, parks/recreation facilities, parking facilities, senior and youth facilities, childcare facilities, job training facilities, cultural facilities, non-residential historic preservation, and homeless facilities.<br><br>Public infrastructure includes: street and sidewalk improvements including lighting and streetscaping, water and sewer improvements, flood drainage improvements, solid waste management improvements. |
|   | <b>Basis for Relative Priority</b> | Based on physical inspection and interviews conducted during consultation process, existing public facilities and infrastructure needs upgrading and expansion.                                                                                                                                                                                                                                                                                                                    |
| 4 | <b>Priority Need Name</b>          | Economic Development and Community Revitalization                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|   | <b>Priority Level</b>              | High                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|   | <b>Population</b>                  | Extremely Low<br>Low<br>Moderate                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|   | <b>Geographic Areas Affected</b>   | Other                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|   | <b>Associated Goals</b>            | Economic development<br>Eliminate slum and blighting influences                                                                                                                                                                                                                                                                                                                                                                                                                    |
|   | <b>Description</b>                 | Possible activities include: workforce and economic development, façade improvement programs, micro-enterprise assistance, demolition of vacant and dilapidated structures that pose a threat to health and safety, code enforcement, and graffiti removal programs.<br><br><u><a href="#">The City of Pueblo intends to apply for a Section 108 Guaranteed Loan to finance a large blight removal project in 2026.</a></u>                                                        |
|   | <b>Basis for Relative Priority</b> | Areas within the City need revitalization to improve the environments and to promote economic growth and activity.                                                                                                                                                                                                                                                                                                                                                                 |
| 5 | <b>Priority Need Name</b>          | Administration and Planning                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|   | <b>Priority Level</b>              | High                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

|                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Population</b>                  | Extremely Low<br>Low<br>Moderate<br>Families with Children<br>Elderly<br>Public Housing Residents<br>Chronic Homelessness<br>Individuals<br>Families with Children<br>Mentally Ill<br>Chronic Substance Abuse<br>veterans<br>Persons with HIV/AIDS<br>Victims of Domestic Violence<br>Unaccompanied Youth<br>Elderly<br>Frail Elderly<br>Persons with Mental Disabilities<br>Persons with Physical Disabilities<br>Persons with Developmental Disabilities<br>Persons with Alcohol or Other Addictions<br>Persons with HIV/AIDS and their Families<br>Victims of Domestic Violence<br>Non-housing Community Development |
| <b>Geographic Areas Affected</b>   | Other<br>Other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Associated Goals</b>            | Fair housing education and outreach<br>Planning and administration of federal programs                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Description</b>                 | Planning and administration is required for the successful implementation of CDBG (citywide) and HOME (countywide) programs as well as education and outreach on fair housing to affirmatively further fair housing choice.                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Basis for Relative Priority</b> | It is critical to properly administer federal programs and to promote fair housing choice.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

### Narrative (Optional)

The above table provides a framework for priorities, needs and goals to address the Pueblo's identified needs during the next five years. The final determination on funded activities will occur during the review process for the prioritization of projects.

The priorities presented were developed by:

- Weighing the severity of the need among all groups and sub-groups
- Analyzing current social, housing, and economic conditions
- Analyzing the relative needs of low and moderate income families
- Assessing the resources likely to be available over the next five years, and
- Evaluating input from stakeholder discussions, public surveys, City department staff and public hearings.

Priorities were established using the following definitions:

- **High** priorities are those activities that will be considered first for funding with CDBG resources.
- **Low** priorities are those activities that will be considered after high-priority projects if CDBG resources are available.

Low priority activities are still important and are not meant to be understood as being unnecessary. The City has identified a limited number of priorities to provide a focus for activities that will be funded in the next five years. If additional funding becomes available, then it is possible that low priority activities will be funded.

For projects that address a high priority need, the City will base funding decisions on the capacity of the sub-recipient (if applicable), the type of project, the potential to leverage federal funds with other resources, the anticipated impact of the project and the reasonableness of the proposed budget. Once projects that address high priorities are acted upon the City will then review projects and activities to meet low priorities.

## SP-30 Influence of Market Conditions - 91.415, 91.215(b)

### Influence of Market Conditions

| Affordable Housing Type               | Market Characteristics that will influence the use of funds available for housing type                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Tenant Based Rental Assistance (TBRA) | The need for tenant Based Rental Assistance for eligible households is demonstrated by the prevalence of cost burden and severe cost burden in the Needs Assessment section. The types of households most in need of rental assistance are extremely low-income renters (0%-30% MFI) and low-income renters (31-50% MFI). Also included in this “worst-case” situation would be those renter households who are threatened with homelessness. The waiting lists of qualified applicants for public housing, Housing Choice Vouchers, and other subsidized housing units across the City attest to the need for rental subsidy programs and expanding them whenever possible. Additionally, in recent years, the increasing economic barriers to homeownership have exerted pressure on the rental market. |
| TBRA for Non-Homeless Special Needs   | The local housing market provides an inadequate supply of rental housing affordable and suitable to special-needs populations, particularly the elderly and persons with disabilities and/or substance abuse issues. Generally, special needs households are more likely to have very low incomes and experience associated housing problems, and the cost of appropriate housing and supportive services can be prohibitive.                                                                                                                                                                                                                                                                                                                                                                             |
| New Unit Production                   | The competitive market makes a strong case for the need to create additional units of affordable housing, especially in configurations that meet the needs identified in this plan. Another compelling reason for public investment in new construction is the policy impact it allows the City to have in neighborhood development, as site selection can advance the aim of affirmatively furthering fair housing, as well as long-range goals identified in the Comprehensive Plan.                                                                                                                                                                                                                                                                                                                    |
| Rehabilitation                        | Protection of the housing stock through rehabilitation helps to stabilize neighborhoods, eliminate blighting influences, and preserve the local tax base. With the majority of the City’s housing stock constructed prior to 1979, there is a considerable need for housing rehabilitation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Acquisition, including preservation   | Extending the affordability restrictions on developments for which they already exist is among the most effective means of preserving the existing inventory of affordable housing. The City will continue to monitor upcoming expiring contracts to identify opportunities for this type of investment and strategies for preservation.                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

**Table 49 – Influence of Market Conditions**

## **SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)**

### **Introduction**

Currently, the City receives CDBG and HOME funds for housing construction, rehabilitation initiatives, community and economic development and public services. These funding sources are expected to be available over the next five years. The City will also receive CDBG-CV funds to prevent, prepare for and respond to the pandemic.

In 2026, the City of Pueblo anticipates submitting an application to HUD for up to \$7,200,000 in Section 108 Loan Guarantee authority to finance the project management, demolition, and site clearance of up to 60 severely blighted residential structures and three commercial buildings located predominantly in low- and moderate-income neighborhoods. This targeted removal of slum and blight will eliminate significant health and safety hazards, reduce crime, and prepare the sites for future redevelopment consistent with the City's goals of neighborhood revitalization and economic opportunity. The project will meet the Slum/Blight Area Basis (SBA) national objective on an area-wide basis and the Low/Mod Area Benefit (LMA) objective. The City is working closely with the Pueblo Urban Renewal Authority and will be utilizing Tax Increment Financing as a method of repayment, but the City's future CDBG allocations will also be pledged as a method of future repayment.

## Anticipated Resources

| Program | Source of Funds  | Uses of Funds                                                                                                                                                       | Expected Amount Available Year 1 |                    |                          |           | Expected Amount Available Remainder of ConPlan \$ | Narrative Description                                                                                                                                                                              |
|---------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|--------------------|--------------------------|-----------|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|         |                  |                                                                                                                                                                     | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$ |                                                   |                                                                                                                                                                                                    |
| CDBG    | public - federal | Acquisition<br>Admin and Planning<br>Economic Development<br>Housing<br>Public Improvements<br>Public Services                                                      | 1,432,469                        | 0                  | 0                        | 1,432,469 | 5,729,876                                         | The expected amount remaining is four times the year 1 allocation assuming that the level of funding remains the same. Prior year CDBG resources include PY2016 (\$309,795) and PY2017 (\$59,715). |
| HOME    | public - federal | Acquisition<br>Homebuyer assistance<br>Homeowner rehab<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership<br>TBRA | 877,545                          | 0                  | 0                        | 877,545   | 3,510,181                                         | The expected amount remaining is four times the year 1 allocation assuming that the level of funding remains the same.                                                                             |

| Program                                                   | Source of Funds                | Uses of Funds                                                                                                   | Expected Amount Available Year 1 |                        |                          |                              | Expected Amount Available Remainder of ConPlan \$ | Narrative Description                                                                                                                                                                                                                                                                                                               |
|-----------------------------------------------------------|--------------------------------|-----------------------------------------------------------------------------------------------------------------|----------------------------------|------------------------|--------------------------|------------------------------|---------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                           |                                |                                                                                                                 | Annual Allocation: \$            | Program Income: \$     | Prior Year Resources: \$ | Total: \$                    |                                                   |                                                                                                                                                                                                                                                                                                                                     |
| <a href="#">CDBG – Section 108 Loan Guarantee Program</a> | <a href="#">Public-federal</a> | <a href="#">Demolition of spot-blight for both residential and commercial throughout Pueblo’s low-mod areas</a> |                                  |                        |                          |                              |                                                   | <a href="#">The final amount of funding expected depends on the application and award for Section 108 funding, up to five times the current award level, which would be \$7,162,345.00. This one-time allocation would be repaid over 20 years and is expected to demolish 60 residential buildings and 3 commercial buildings.</a> |
|                                                           |                                |                                                                                                                 | <a href="#">\$7,162,345</a>      | <a href="#">\$0.00</a> | <a href="#">\$0.00</a>   | <a href="#">\$7,162,345.</a> | <a href="#">\$0.00</a>                            |                                                                                                                                                                                                                                                                                                                                     |
|                                                           |                                |                                                                                                                 |                                  |                        |                          |                              |                                                   |                                                                                                                                                                                                                                                                                                                                     |
|                                                           |                                |                                                                                                                 |                                  |                        |                          |                              |                                                   |                                                                                                                                                                                                                                                                                                                                     |

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Table 50 - Anticipated Resources

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

The City and County currently fund over 40 non-profit agencies through the Community Services Advisory Commission (CSAC) and other processes. The CSAC group, which funds the majority of these non-profit organizations, makes funding recommendations to the governing bodies. Over \$4 million in general funds have been granted to local agencies that serve the Pueblo community in 2024 alone. These are general revenue funds, and allocations are made during the yearly budget process. Based on historical funding, over \$20 million will be made available to local non-profits over the next five years.

The City and County of Pueblo as the Pueblo Consortium matches the HOME Investment Partnership Act grant with general funds. HOME funds are leveraged well with public/private partnerships, such as Low-Income Housing Tax Credits or other equity mechanisms. In addition the Consortium will use qualifying affordable housing expenditures made by each entity as match and has some funds that it carries forward from prior years. Leveraging of private and non-federal resources will be sought whenever possible.

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

#### **Discussion**

## SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

| Responsible Entity                                | Responsible Entity Type          | Role                                                                         | Geographic Area Served |
|---------------------------------------------------|----------------------------------|------------------------------------------------------------------------------|------------------------|
| Pueblo County Housing & Human Services Department | Government                       | Non-homeless special needs<br>Ownership<br>Public Housing<br>public services | Jurisdiction           |
| POSADA, INC                                       | Non-profit organizations         | Homelessness                                                                 | Jurisdiction           |
| Catholic Charities, Diocese of Pueblo, Inc.       | Non-profit organizations         | Non-homeless special needs<br>public services                                | Jurisdiction           |
| Housing Authority of the City of Pueblo           | PHA                              | Public Housing                                                               | Jurisdiction           |
| <u>Pueblo Urban Renewal Authority</u>             | <u>Quasi-governmental entity</u> | <u>Blight Removal</u>                                                        | <u>Jurisdiction</u>    |

Table 51 - Institutional Delivery Structure

### Assess of Strengths and Gaps in the Institutional Delivery System

The greatest gap in meeting the City's housing and community development needs is the reduced capacity of many agencies, given funding limitations in recent years, to carry out their work to the extent that is needed. Additionally, the complexity of cases has increased over the past 5-10 years and additional resources are needed to stabilize individuals and households that are touching multiple systems (i.e. justice system, homeless system, mental health, and substance abuse, etc.). Reductions in workforce and the scope of projects and programs resulting from the dwindling of resources pose a serious challenge to meeting escalating demand for affordable housing and related services. Additionally, a greater degree of coordination is needed to ensure that the wide-ranging efforts of housing and service providers most effectively meet the community's most critical needs.

### Availability of services targeted to homeless persons and persons with HIV and mainstream services

| Homelessness Prevention Services | Available in the Community | Targeted to Homeless | Targeted to People with HIV |
|----------------------------------|----------------------------|----------------------|-----------------------------|
| Homelessness Prevention Services |                            |                      |                             |
| Counseling/Advocacy              | X                          | X                    | X                           |
| Legal Assistance                 | X                          | X                    | X                           |
| Mortgage Assistance              | X                          |                      |                             |

| Homelessness Prevention Services        | Available in the Community | Targeted to Homeless | Targeted to People with HIV |
|-----------------------------------------|----------------------------|----------------------|-----------------------------|
| <b>Homelessness Prevention Services</b> |                            |                      |                             |
| Rental Assistance                       | X                          | X                    | X                           |
| Utilities Assistance                    | X                          |                      |                             |
| <b>Street Outreach Services</b>         |                            |                      |                             |
| Law Enforcement                         |                            | X                    |                             |
| Mobile Clinics                          |                            |                      |                             |
| Other Street Outreach Services          | X                          | X                    |                             |
| <b>Supportive Services</b>              |                            |                      |                             |
| Alcohol & Drug Abuse                    | X                          | X                    | X                           |
| Child Care                              | X                          |                      |                             |
| Education                               | X                          | X                    |                             |
| Employment and Employment Training      | X                          |                      |                             |
| Healthcare                              | X                          | X                    | X                           |
| HIV/AIDS                                | X                          | X                    | X                           |
| Life Skills                             | X                          | X                    | X                           |
| Mental Health Counseling                | X                          | X                    | X                           |
| Transportation                          | X                          |                      |                             |
| <b>Other</b>                            |                            |                      |                             |
|                                         | X                          |                      |                             |

Table 52 - Homeless Prevention Services Summary

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

There are several shelter resources available for persons experiencing homelessness including: The Pueblo Shelter, The Right Place, Posada, and the YWCA. In addition to these housing options, there is a wide variety of service providers working with persons experiencing homelessness or who are at risk of homelessness. Providers range from government entities to faith-based organizations and non-profit agencies. CDBG public service funds have been used in the past – and will be used in the 2025-2029 Consolidated Plan - to assess and meet the needs of persons experiencing homelessness.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

Pueblo is not an ESG entitlement grantee and uses CDBG funds to assist in meeting the needs of persons experiencing homelessness or who are at risk of homelessness. In instances where government entities provide services directly, there are fewer gaps in the institutional delivery structure. City agencies collaborate with other City entities on a regular basis and can ensure the delivery of services. In

addition, when a non-profit agency receives public funding such as CDBG as a subrecipient, the City has greater control and influence in ensuring consistency in services and a more seamless approach. Gaps exist, therefore, for two primary reasons: 1) the City does not have control over the activities of the non-government agencies that are not receiving public dollars, and the agency is not obligated to provide services in a manner consistent with the Consolidated Plan, and 2) there is a general lack of funding to provide the level of service needed to meet the demand. As a result, individual cases get prioritized which necessarily means that some needs are unmet.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The City of Pueblo is committed to the continued coordination of all Anti-Poverty and Community Development initiatives. The City has entered into several intergovernmental agreements with other entities such as Pueblo County to administer the CSAC process, which allocates general revenue funds from both entities to non-profit agencies and economic development organizations that enhance the quality of life in the community.

In 2024, the City of Pueblo took over operations of the City's only homeless shelter after the non-profit organization that owned and operated the shelter abruptly dissolved. The City intends to retain long-term ownership to ensure stability and partner with a shelter operator for day-to-day onsite activities.

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

The City will continue:

- Soliciting input from community stakeholders.
- Prioritizing interdepartmental coordination.
- Collaborations and partnerships with non-city organizations for planning and program implementation purposes; and
- Exploring opportunities for funding to carry out portions of the Consolidated Plan not funded through CDBG or HOME funds.

## SP-45 Goals - 91.415, 91.215(a)(4)

### Goals Summary Information

| Sort Order | Goal Name                                  | Start Year | End Year | Category           | Geographic Area        | Needs Addressed    | Funding                                  | Goal Outcome Indicator                                                                                                                                                          |
|------------|--------------------------------------------|------------|----------|--------------------|------------------------|--------------------|------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1          | Preserve existing affordable units (rehab) | 2025       | 2029     | Affordable Housing | Citywide<br>Countywide | Affordable Housing | CDBG:<br>\$500,000<br>HOME:<br>\$500,000 | Rental units rehabilitated:<br>10 Household Housing Unit<br><br>Homeowner Housing Rehabilitated:<br>80 Household Housing Unit                                                   |
| 2          | New construction of affordable housing     | 2025       | 2029     | Affordable Housing | Citywide<br>Countywide | Affordable Housing | HOME:<br>\$2,200,000                     | Rental units constructed:<br>23 Household Housing Unit<br><br>Homeowner Housing Added:<br>8 Household Housing Unit                                                              |
| 3          | Acquisition and rehabilitation of housing  | 2025       | 2029     | Affordable Housing | Citywide<br>Countywide | Affordable Housing | HOME:<br>\$1,100,000                     | Homeowner Housing Rehabilitated:<br>3 Household Housing Unit                                                                                                                    |
| 4          | Financial assistance to renters and owners | 2025       | 2029     | Affordable Housing | Citywide               | Affordable Housing | CDBG:<br>\$50,000<br>HOME:<br>\$450,000  | Public service activities for Low/Moderate Income Housing Benefit:<br>15 Households Assisted<br><br>Tenant-based rental assistance / Rapid Rehousing:<br>85 Households Assisted |

| Sort Order | Goal Name                                          | Start Year | End Year | Category                                                                        | Geographic Area | Needs Addressed                                   | Funding           | Goal Outcome Indicator                                                                                                                                                                           |
|------------|----------------------------------------------------|------------|----------|---------------------------------------------------------------------------------|-----------------|---------------------------------------------------|-------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5          | Provide housing and services to homeless           | 2025       | 2029     | Affordable Housing Homeless                                                     | Citywide        | Public Services including Services for Homeless   | CDBG: \$650,000   | Public service activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted<br><br>Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted |
| 6          | Provide public services to non-homeless population | 2025       | 2029     | Affordable Housing Non-Homeless Special Needs Non-Housing Community Development | Citywide        | Public Services including Services for Homeless   | CDBG: \$300,000   | Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted                                                                                                   |
| 7          | Improve and maintain public infrastructure and fac | 2025       | 2029     | Non-Housing Community Development                                               | Citywide        | Public Infrastructure and Facilities              | CDBG: \$2,775,000 | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2750 Persons Assisted                                                                               |
| 8          | Economic development                               | 2025       | 2029     | Non-Housing Community Development                                               | Citywide        | Economic Development and Community Revitalization | CDBG: \$300,000   | Jobs created/retained: 25 Jobs                                                                                                                                                                   |

| Sort Order | Goal Name                                       | Start Year | End Year | Category                                                                                                                  | Geographic Area        | Needs Addressed                                   | Funding                                               | Goal Outcome Indicator                             |
|------------|-------------------------------------------------|------------|----------|---------------------------------------------------------------------------------------------------------------------------|------------------------|---------------------------------------------------|-------------------------------------------------------|----------------------------------------------------|
| 10         | Eliminate slum and blighting influences         | 2025       | 2029     | Affordable Housing<br>Non-Housing<br>Community Development                                                                | Citywide               | Economic Development and Community Revitalization | CDBG:<br><del>\$1,000,000</del><br><u>\$8,200,000</u> | Buildings Demolished:<br><del>1265</del> Buildings |
| 11         | Planning and administration of federal programs | 2025       | 2029     | Affordable Housing<br>Public Housing<br>Homeless<br>Non-Homeless<br>Special Needs<br>Non-Housing<br>Community Development | Citywide<br>Countywide | Administration and Planning                       | CDBG:<br>\$1,375,000<br>HOME:<br>\$460,000            | Other:<br>11 Other                                 |
| 12         | Fair housing education and outreach             | 2025       | 2029     | Fair Housing                                                                                                              | Citywide               | Administration and Planning                       | CDBG:<br>\$25,000                                     | Other:<br>10 Other                                 |

Table 53 – Goals Summary

## Goal Descriptions

|   |                         |                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <b>Goal Name</b>        | Preserve existing affordable units (rehab)                                                                                                                                                                                                                                                                                                                                                                                 |
|   | <b>Goal Description</b> | Rehabilitation/reconstruction of single and multi-family housing; energy efficiency improvements; accessibility modifications; lead based paint hazard testing and abatement; minor repairs; and preservation of affordable units.<br><br>HOME assistance to rental units rehabilitated will serve: (4) households at or below 30% AMI, (4) households at or below 50% AMI, and (2) households at or below 60% AMI.        |
| 2 | <b>Goal Name</b>        | New construction of affordable housing                                                                                                                                                                                                                                                                                                                                                                                     |
|   | <b>Goal Description</b> | New construction of HOME affordable rental housing units<br><br>(13) Units at or below 50% AMI<br><br>(10) Units at or below 60% AMI but below greater than 50% AMI<br><br>HOME assisted new construction of homeowner housing on infill lots will serve eight households below 80% AMI.                                                                                                                                   |
| 3 | <b>Goal Name</b>        | Acquisition and rehabilitation of housing                                                                                                                                                                                                                                                                                                                                                                                  |
|   | <b>Goal Description</b> | Acquisition and rehabilitation of housing<br><br>HOME assistance: (3) Acquisition Rehab projects assisting households below 80% AMI.                                                                                                                                                                                                                                                                                       |
| 4 | <b>Goal Name</b>        | Financial assistance to renters and owners                                                                                                                                                                                                                                                                                                                                                                                 |
|   | <b>Goal Description</b> | Housing services including down payment assistance and/or and homebuyer education programs, Tenant Based Rental Assistance, security deposit assistance and other financial supports to increase access to decent affordable housing.<br><br>HOME TBRA will serve the following households:<br><br>(40) ELI households - below 30% AMI<br><br>(35) LI households - below 50% AMI<br><br>(10) MI households - below 60% AMI |
| 5 | <b>Goal Name</b>        | Provide housing and services to homeless                                                                                                                                                                                                                                                                                                                                                                                   |
|   | <b>Goal Description</b> | Housing and services for homeless and near homeless include outreach, emergency, transitional and permanent supportive housing, Rapid Re-Housing, supporting services and rental assistance                                                                                                                                                                                                                                |

|    |                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6  | <b>Goal Name</b>        | Provide public services to non-homeless population                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|    | <b>Goal Description</b> | Other public services that are needed include: housing and services for persons with physical, developmental and/or intellectual disabilities; employment and workforce development; screening for lead-based paint hazards; housing counseling; neighborhood clean-up programs; transportation; health and mental health services; services for persons recovering from addiction; youth programs, food banks and other food-related services; childcare and related services; senior programs and related services; legal services; and financial literacy. |
| 7  | <b>Goal Name</b>        | Improve and maintain public infrastructure and fac                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|    | <b>Goal Description</b> | Public facilities include neighborhood facilities, parks/recreation facilities, parking facilities, senior and youth facilities, childcare facilities, job training facilities, cultural facilities, non-residential historic preservation, and homeless facilities. Public infrastructure includes: street and sidewalk improvements including lighting and streetscaping, water and sewer improvements, flood drainage improvements, solid waste management improvements.                                                                                   |
| 8  | <b>Goal Name</b>        | Economic development                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|    | <b>Goal Description</b> | Includes activities such as workforce and other economic development initiatives.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| 10 | <b>Goal Name</b>        | Eliminate slum and blighting influences                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|    | <b>Goal Description</b> | Demolition of vacant and dilapidated structures that pose a threat to health and safety, code enforcement, and graffiti removal programs as well as facade improvement projects.                                                                                                                                                                                                                                                                                                                                                                              |
| 11 | <b>Goal Name</b>        | Planning and administration of federal programs                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|    | <b>Goal Description</b> | Planning and administration is required for the successful implementation of CDBG and HOME programs.                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 12 | <b>Goal Name</b>        | Fair housing education and outreach                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|    | <b>Goal Description</b> | Education and outreach on fair housing to affirmatively further fair housing choice.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

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

- TBRA – 20 ELI, 35 LI, 10 MI
- New Rental Unit Construction – 13 LI, 10 MI
- Acquisition Rehab serving homeowners – 3 MI
- Rental Rehabilitation – 4 ELI, 4 LI, 2 MI
- Homebuyer/In-fill Program – 8 MI
- HOME-AARP - Acquire non-congregate shelters, 20 ELI

## **SP-50 Public Housing Accessibility and Involvement - 91.415, 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

The Housing Authority of the City of Pueblo fully meets the requirements of Section 504. There are 44 accessible units among the 689 units of public housing.

### **Activities to Increase Resident Involvements**

The Housing Authority of the City of Pueblo (HACP) recognized that empowering residents fosters stronger neighborhoods, enhances quality of life, and ensures that programs truly meet the needs of those they serve. Through various initiatives such as Resident Councils, the Resident Advisory Board and the Family Self-Sufficiency Program – HACP provides structured avenues to make their voices heard, influence policies, and take meaningful steps toward personal and community growth.

Resident Council and Resident Advisory Board serves as a critical bridge between tenants and housing management, providing a platform for open dialogue for collaborating with HACP to drive meaningful change by providing input on program implementation. The Resident Advisory board strengthens the connection between HACP and the residents and ensures that resident concerns are prioritized in decision-making

HACP also administers the Family Self-Sufficiency Program, which is a five-year voluntary program for participants in both the Housing Choice Voucher and the Public Housing programs. The program is designed to help individuals with improving their economic status by reducing their dependence on public assistance.

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

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

This initiative is designed to equip the resident with the tools needed to break the cycles of poverty and build a foundation for future success.

### **Is the public housing agency designated as troubled under 24 CFR part 902?**

No

### **Plan to remove the ‘troubled’ designation**

Not applicable as HACP is not designated as “troubled” under 24 CFR Part 902.

## **SP-55 Strategic Plan Barriers to Affordable Housing - 91.415, 91.215(h)**

### **Barriers to Affordable Housing**

The City is preparing an Analysis of Impediments to Fair Housing Choice concurrently with the Consolidated Plan for 2025. This AI noted that as housing prices rise relative to income, the City must continue its work in creating conditions for efficient development of new housing stock.

Unleashing market-rate housing can ease pressure on housing costs down the economic spectrum, as higher-income residents are often attracted to newer developments and therefore do not displace incumbent residents or outbid lower-income competitors for existing housing stock. However, new building permits dropped significantly after 2021, according to the Pueblo Comprehensive Plan and the Housing Needs Assessment, updated in 2024.

To facilitate efficiency in developing new housing stock and helping residence afford housing, the City's action plan includes:

- Ensuring that municipal zoning ordinances relax restrictions on multifamily housing where appropriate, especially in infill areas
- Exploring land-use designations for high-density housing
- Decreasing construction costs by modernizing codes
- Reforming acquisition and disposition policies of city-owned real estate to encourage development
- Streamlining city/county coordination for speedier development processes

This is not a comprehensive list, but rather examples of the most targeted ways in which the City and County of Pueblo are working to update existing public policies and encourage residential investment over the next five years.



### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

The following list is not intended to be exhaustive. However, the following are some identified strategies to overcome barriers to affordable housing:

- Invest CDBG and HOME funds in improvements/rehabilitation of existing housing and development of affordable housing
- In the zoning regulatory update, explore relaxation on restrictions of multifamily zoning, particularly in infill areas
- Modernize codes to facilitate affordable construction
- Speed up development with more streamlined coordination/communication between county and city departments
- Create more public-private partnerships for demolition of unsafe or blighted housing & new construction
- Explore stricter codes to prevent further neglect of existing properties so those buildings can remain a source of safe, affordable housing

## **SP-60 Homelessness Strategy - 91.415, 91.215(d)**

Describe how the jurisdiction's strategic plan goals contribute to:

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

The Pueblo CoC, which is part of the Colorado Balance of State, has a long-term goal of decreasing the number of persons experiencing homelessness by moving individuals and families from homelessness into permanent housing. To achieve this objective, the CoC meets regularly to monitor, discuss ongoing needs and issues that affect those impacted by homelessness. Health Solutions serves as the lead CoC agency and provides outreach to assess the individual needs of those experiencing homelessness. The CoC is engaging in the Built for Zero campaign, which is an approach that seeks to end homelessness using a By-Names list for each subcategory (i.e. veterans, families, etc.). After first implementing the model in 2021, CoC has continued its efforts to address homelessness statewide.

### **Addressing the emergency and transitional housing needs of homeless persons**

The City of Pueblo acquired the City's only overnight emergency shelter in 2024 after the non-profit ownership dissolved. The City has put in significant investment to ensure the shelter remains in operation and is dedicated to the long-term success as the owner and operator. Additionally, eight units of non-congregate shelters will be installed by December 31, 2025 at this site, allowing a private sheltering option for persons with disabilities, youth, or other special needs.

Several other area nonprofits and a special unit located in the City of Pueblo Police Department provide homeless outreach to local camps and areas of town where the need is high. The teams includes medical and mental health professionals; veterans' representatives; retired Medevac personnel and law enforcement. Resources and referrals, which include shelter, are provided to individuals and families.

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

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

The City is in process of constructing eight non-congregate shelter units that will be used to house special homeless populations, which may include chronically homeless individuals and families, unaccompanied youth, persons with disabilities or other high-needs populations.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

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

## **SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

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

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

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

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

In 2014, the EPA designated the Colorado Smelter Site as a Superfund site for lead contamination. Preliminary findings have shown elevated blood levels in children in the immediate Eilers neighborhood, which is why the lead program is available for free to residents in this neighborhood.

### **How are the actions listed above integrated into housing policies and procedures?**

Federally funded housing programs require required lead-based paint assessments and abatement. The following are the TBRA and rehab guidelines related to LBP:

The City of Pueblo complies with federal regulations regarding lead-based paint. The City only hires certified/trained inspectors, contractors, and risk assessors to work with and assess lead-based paint/hazards. Any work that must be completed to address lead-based paint hazards will be considered a "code deficiency" and will be given priority over non-code items.

Section 401(b) of the Lead Based Paint Poisoning Prevention Act (42 U.S.C. 831(b)) prohibits the use of lead-based paint in residential structures constructed or rehabilitated with federal assistance; the City complies.

Each purchaser, tenant, or occupant of housing to be assisted under this program that was constructed prior to 1978 is notified of the hazards of lead-based paint poisoning. Each participant is notified:

- that the property may contain lead based paint;

- of the hazards of lead based paint;
- of the symptoms and treatment of lead poisoning;
- of the precautions to be taken to avoid lead based paint poisoning (including maintenance and removal techniques for eliminating such hazards);
- of the advisability and availability of blood lead level screening for children under seven years of age; and
- that in the event lead based paint is found on the property, appropriate abatement procedures may be undertaken.

In the rehabilitation program, the following is implemented:

All units constructed prior to 1978, and receiving more than \$5,000 in assistance, will be assessed for lead-based paint hazards and any defective conditions found included in the work write-up for the rehabilitation work.

All units constructed prior to 1978 which include a child under seven years of age with and identified with an elevated blood level (EBL) shall be tested by using an X-ray fluorescence analyzer (XRF) or other method approved by HUD. Test readings of 1.0 mg/cm<sup>2</sup> or higher using an XRF shall be considered positive for presence of lead-based paint,

Prior to final inspection and approval of the rehabilitation project, a clearance examination shall be conducted. This examination will be in accordance with HUD's Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing, 2012, and will document the status of the corrective measures completed through abatement, encapsulation, enclosure, or an appropriate set of interim controls used to control LBP hazards.

DHCS staff is trained on the EPA required Renovation, Repair and Painting Program and actively offers training opportunities to contractors carrying out rehabilitation work.

## **SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

Pueblo recognizes that it does not have significant control over the factors that reduce the number of households with incomes below the poverty level. However, the City uses local and federal funds to provide public services to support individuals and households as they strive to become self-sufficient.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

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

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

## **SP-80 Monitoring - 91.230**

**Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

The Department of Housing and Citizen Services is responsible for ensuring that the recipients of federal funds meet the purposes of the appropriate legislation and regulations, and that funds are disbursed in a timely manner.

As a recipient of federal CDBG funds, the City of Pueblo is responsible for managing the day-to-day operations of all CDBG funded activities and ensuring that CDBG funds are used within all applicable requirements. Monitoring is the primary tool to ensure that this happens.

The three primary goals of monitoring are:

- Ensure production and accountability.
- Ensure compliance with CDBG and other federal requirements.
- Evaluate organizational and project performance.

At the end of every grant year, an outside agency completes an audit of the City's financial system. As part of the auditing process, a "single audit" is completed per 2 CFR 200 for the federal funds that the City received during the previous fiscal year.

Any outside agency that receives funds through a subrecipient agreement will also be subject to periodic monitoring. Each social service agency must submit periodic progress reports along with their reimbursement request for a desktop review before any disbursement will occur. Department of Housing and Citizen Services staff also conducts an onsite monitoring visit to all social service agencies receiving CDBG funding.

The Department uses a risk-based model to determine which agencies may require technical service assistance. Grantees may request TA at any time, but for new grantees or grantees with a higher level of risk based on staff turnover or type of services provided, the TA will occur after the agency submits their first progress report and before any reimbursement of funds are made.

operations is available through the Community Development Block Grant (CDBG) program, with

additional capital upgrades planned through both CDBG and HOME funding sources.

## **2. Homelessness Prevention**

Through partnerships with nonprofit organizations, the CDBG program provides financial support for eviction prevention efforts, helping individuals and families remain stably housed.

## **3. Outreach Efforts**

The City also supports outreach initiatives, including CDBG-funded programs such as youth outreach, designed to connect vulnerable populations with essential services.

By leveraging local resources and funding opportunities, the City of Pueblo remains committed to addressing homelessness through coordinated services, prevention strategies, and targeted outreach.

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

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

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

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City of Pueblo is actively addressing emergency shelter and transitional housing needs for individuals experiencing homelessness through a combination of shelter services, prevention initiatives, and outreach efforts.

#### **Emergency Shelter Services**

The City owns and operates Pueblo's only homeless shelter, ensuring access to safe and stable temporary housing. Wraparound services are coordinated by the Department of Community and Human Services (DCHS) to provide comprehensive support. Funding for shelter operations is available through the Community Development Block Grant (CDBG) program, with additional capital upgrades planned

using both CDBG and HOME funding sources.

#### **Transitional Housing & Prevention Efforts**

To support long-term stability, the City collaborates with nonprofit partners to prevent homelessness through eviction prevention programs funded by the CDBG program. These efforts help individuals and families avoid displacement and transition to stable housing.

#### **Outreach & Community Engagement**

Recognizing the importance of outreach, the City funds initiatives such as youth outreach programs through CDBG, ensuring that vulnerable populations receive access to resources that promote stability and reintegration into the community.

By leveraging local resources and funding opportunities, the City of Pueblo remains committed to providing both immediate shelter and long-term housing solutions for individuals experiencing homelessness.

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

The City of Pueblo remains committed to ensuring housing stability and providing critical assistance to individuals experiencing homelessness or at risk of becoming homeless. These efforts focus on three key areas:

##### **1. Homeless Services**

The City owns and operates Pueblo's only homeless shelter, with wraparound services coordinated by the Department of Community and Human Services (DCHS). Shelter operations are supported through Community Development Block Grant (CDBG) funding, with additional capital upgrades planned using both CDBG and HOME funding.

##### **2. Homelessness Prevention**

Through strategic partnerships with nonprofit organizations, the City invests CDBG funds in eviction

prevention programs, helping residents maintain stable housing and avoid displacement.

### 3. Outreach Initiatives

The City supports various outreach efforts, including youth outreach programs, homelessness prevention services, and operational funding for housing providers—all made possible through CDBG funding.

Despite these ongoing efforts, **funding remains the primary challenge** in expanding housing and support services for individuals and families experiencing homelessness. This issue is expected to intensify as eviction moratoria are lifted, leading to an increase in displacement.

The City of Pueblo remains dedicated to investing CDBG funds strategically to provide essential services and address the evolving needs of the community.

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

The City of Pueblo remains committed to ensuring housing stability and providing critical assistance to individuals experiencing homelessness or at risk of becoming homeless. These efforts focus on three key areas:

#### 1. Homeless Services

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#### 2. Homelessness Prevention

Through strategic partnerships with nonprofit organizations, the City invests CDBG funds in eviction prevention programs, helping residents maintain stable housing and avoid displacement.

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Despite these ongoing efforts, **funding remains the primary challenge** in expanding housing and support services for individuals and families experiencing homelessness. This issue is expected to intensify as eviction moratoria are lifted, leading to an increase in displacement.

The City of Pueblo remains dedicated to investing CDBG funds strategically to provide essential services and address the evolving needs of the community.

## **Discussion**



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# 2025 ANNUAL ACTION PLAN SUBSTANTIAL AMENDMENT - DRAFT

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City of Pueblo and the Pueblo Consortium



Draft Display December 10, 2025 – January 12, 2026, at 5:00 p.m.



## Expected Resources

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

#### Introduction

Currently, the City receives CDBG and HOME funds for housing construction, rehabilitation initiatives, community and economic development and public services. These funding sources are expected to be available over the next five years. The City will also receive CDBG-CV funds to prevent, prepare for and respond to the pandemic.

#### Anticipated Resources

| Program | Source of Funds  | Uses of Funds        | Expected Amount Available Year 1 |                    |                          |                         | Expected Amount Available Remainder of ConPlan \$ | Narrative Description                                                                                                                                                                              |
|---------|------------------|----------------------|----------------------------------|--------------------|--------------------------|-------------------------|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|         |                  |                      | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$               |                                                   |                                                                                                                                                                                                    |
| CDBG    | public - federal | Acquisition          |                                  |                    |                          |                         |                                                   | The expected amount remaining is four times the year 1 allocation assuming that the level of funding remains the same. Prior year CDBG resources include PY2016 (\$309,795) and PY2017 (\$59,715). |
|         |                  | Admin and Planning   |                                  |                    |                          |                         |                                                   |                                                                                                                                                                                                    |
|         |                  | Economic Development |                                  |                    |                          |                         |                                                   |                                                                                                                                                                                                    |
|         |                  | Housing              |                                  |                    |                          |                         |                                                   |                                                                                                                                                                                                    |
|         |                  | Public Improvements  | <del>1,432,469.00</del>          |                    |                          | <del>2,906,143.00</del> |                                                   |                                                                                                                                                                                                    |
|         |                  | Public Services      | <del>1,403,799.00</del>          | 0.00               | 1,473,674.00             | <del>2,877,473.00</del> | 5,729,876.00                                      |                                                                                                                                                                                                    |

| Program                                          | Source of Funds       | Uses of Funds                                                                                          | Expected Amount Available Year 1 |                    |                          |                     | Expected Amount Available Remainder of ConPlan \$ | Narrative Description                                                                                                                                                                                                                                                                                                      |
|--------------------------------------------------|-----------------------|--------------------------------------------------------------------------------------------------------|----------------------------------|--------------------|--------------------------|---------------------|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                  |                       |                                                                                                        | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$           |                                                   |                                                                                                                                                                                                                                                                                                                            |
| <u>CDBG – Section 108 Loan Guarantee Program</u> | <u>Public-federal</u> | <u>Demolition of spot-blight for both residential and commercial throughout Pueblo’s low-mod areas</u> | <u>\$7,162,345</u>               | <u>\$0.00</u>      | <u>\$0.00</u>            | <u>\$7,162,345.</u> | <u>\$0.00</u>                                     | <u>The final amount of funding expected depends on the application and award for Section 108 funding, up to five times the current award level, which would be \$7,162,345.00. This one-time allocation would be repaid over 20 years and is expected to demolish 60 residential buildings and 3 commercial buildings.</u> |

| Program | Source of Funds  | Uses of Funds                                                                                                                                                       | Expected Amount Available Year 1 |                    |                          |            | Expected Amount Available Remainder of ConPlan \$ | Narrative Description                                                                                                  |
|---------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|--------------------|--------------------------|------------|---------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
|         |                  |                                                                                                                                                                     | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$  |                                                   |                                                                                                                        |
| HOME    | public - federal | Acquisition<br>Homebuyer assistance<br>Homeowner rehab<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership<br>TBRA | 877,545.14                       | 0.00               | 0.00                     | 877,545.14 | 3,510,180.56                                      | The expected amount remaining is four times the year 1 allocation assuming that the level of funding remains the same. |

**Table 1 - Expected Resources – Priority Table**

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

The City and County currently fund over 40 non-profit agencies through the Community Services Advisory Commission (CSAC) and other processes. The CSAC group, which funds the majority of these non-profit organizations, makes funding recommendations to the governing bodies. Over \$4 million in general funds have been granted to local agencies that serve the Pueblo community in 2024 alone. These are general revenue funds, and allocations are made during the yearly budget process. Based on historical funding, over \$20 million will be made available to local non-profits over the next five years.

The City and County of Pueblo as the Pueblo Consortium matches the HOME Investment Partnership Act grant with general funds. HOME funds are leveraged well with public/private partnerships, such as Low-Income Housing Tax Credits or other equity mechanisms. In addition the Consortium will use qualifying affordable housing expenditures made by each entity as match and has some funds that it carries forward from prior years. Leveraging of private and non-federal resources will be sought whenever possible.

The City intends to apply to HUD's Section 108 Loan Guarantee Program for up to five times the 2025 CDBG allocation to reduce spot blight in residential and commercial areas of Pueblo's low-moderate income neighborhoods. It is anticipated the City will demolish more than 60 residential homes and more than three commercial buildings. After demolition, redevelopment on the newly vacant residential lots will be prioritized using the City's available resources which could include: HOME, CDBG, Private Activity Bonds (PABs), and General Fund. Additional partner funding, such as Tax Increment Financing (TIF) through the Pueblo Urban Renewal Authority will be used to help service the debt. Any debt that cannot be serviced using funding generated through the sale of the lots or the TIF generated from the area will be serviced through future years of CDBG funding.

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## Annual Goals and Objectives

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

#### Goals Summary Information

| Sort Order | Goal Name                                          | Start Year | End Year | Category                                                                                    | Geographic Area        | Needs Addressed                                 | Funding               | Goal Outcome Indicator                                                                                                                                                                       |
|------------|----------------------------------------------------|------------|----------|---------------------------------------------------------------------------------------------|------------------------|-------------------------------------------------|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2          | New construction of affordable housing             | 2020       | 2024     | Affordable Housing                                                                          | Citywide<br>Countywide | Affordable Housing                              | HOME:<br>\$715,799.00 | Rental units constructed: 6 Household Housing Unit                                                                                                                                           |
| 3          | Preserve existing affordable units (rehab)         | 2020       | 2024     | Affordable Housing                                                                          | Citywide               | Affordable Housing                              | CDBG:<br>\$185,000.00 | Homeowner Housing Rehabilitated: 29 Household Housing Unit                                                                                                                                   |
| 5          | Provide housing and services to homeless           | 2020       | 2024     | Affordable Housing<br>Homeless                                                              | Citywide               | Public Services including Services for Homeless | CDBG:<br>\$160,892.00 | Public service activities other than Low/Moderate Income Housing Benefit: 1958 Persons Assisted<br>Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted |
| 6          | Provide public services to non-homeless population | 2020       | 2024     | Affordable Housing<br>Non-Homeless<br>Special Needs<br>Non-Housing<br>Community Development | Citywide               | Public Services including Services for Homeless | CDBG:<br>\$46,372.00  | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 432 Persons Assisted                                                                            |

| Sort Order | Goal Name                                          | Start Year | End Year | Category                                                                                                               | Geographic Area        | Needs Addressed                                   | Funding                                  | Goal Outcome Indicator                                                                                             |
|------------|----------------------------------------------------|------------|----------|------------------------------------------------------------------------------------------------------------------------|------------------------|---------------------------------------------------|------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| 7          | Improve and maintain public infrastructure and fac | 2020       | 2024     | Non-Housing Community Development                                                                                      | Citywide               | Public Infrastructure and Facilities              | CDBG: \$1,156,455.00                     | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 6032 Persons Assisted |
| 11         | Planning and administration of federal programs    | 2020       | 2024     | Affordable Housing<br>Public Housing<br>Homeless<br>Non-Homeless<br>Special Needs<br>Non-Housing Community Development | Citywide<br>Countywide | Administration and Planning                       | CDBG: \$294,750.00<br>HOME: \$209,900.00 | Other: 2 Other                                                                                                     |
| 12         | Fair housing education and outreach                | 2020       | 2024     | Fair Housing                                                                                                           | Citywide               | Administration and Planning                       |                                          |                                                                                                                    |
| 13         | Economic development                               | 2025       | 2029     | Non-Housing Community Development                                                                                      | Citywide               | Economic Development and Community Revitalization | CDBG: \$200,000.00<br>HOME: \$.00        | Facade treatment/business building rehabilitation: 5 Business                                                      |
| 14         | Eliminate slum and blighting influences            | 2025       | 2029     | Affordable Housing<br>Non-Housing Community Development                                                                |                        |                                                   | CDBG: \$300,000                          | Buildings Demolished: 2 Buildings                                                                                  |

**Table 2 – Goals Summary**

## Goal Descriptions

|   |                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2 | <b>Goal Name</b>        | New construction of affordable housing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|   | <b>Goal Description</b> | New construction of affordable housing units                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 3 | <b>Goal Name</b>        | Preserve existing affordable units (rehab)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|   | <b>Goal Description</b> | Rehabilitation/reconstruction of single and multi-family housing; energy efficiency improvements; accessibility modifications; lead based paint hazard testing and abatement; minor repairs; and preservation of affordable units.                                                                                                                                                                                                                                                                                                                                                                                                         |
| 5 | <b>Goal Name</b>        | Provide housing and services to homeless                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|   | <b>Goal Description</b> | Housing and services for homeless and near homeless include outreach, emergency, transitional and permanent supportive housing, Rapid Re-Housing, supporting services and rental assistance                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 6 | <b>Goal Name</b>        | Provide public services to non-homeless population                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|   | <b>Goal Description</b> | Other public services that are needed include: housing and services for persons with HIV/AIDS; services for persons with physical, developmental and/or intellectual disabilities; employment and workforce development; screening for lead-based paint hazards; housing counseling; neighborhood clean-up programs; crime awareness and prevention programs; transportation; health and mental health services; services for persons recovering from addiction; youth programs, food banks and other food-related services; childcare and related services; senior programs and related services; legal services; and financial literacy. |
| 7 | <b>Goal Name</b>        | Improve and maintain public infrastructure and fac                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|   | <b>Goal Description</b> | Public facilities include neighborhood facilities, parks/recreation facilities, parking facilities, senior and youth facilities, childcare facilities, job training facilities, cultural facilities, non-residential historic preservation, and homeless facilities.<br><br>Public infrastructure includes street and sidewalk improvements including lighting and streetscaping, water and sewer improvements, flood drainage improvements, solid waste management improvements.                                                                                                                                                          |

|    |                         |                                                                                                                                                                                                                  |
|----|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11 | <b>Goal Name</b>        | Planning and administration of federal programs                                                                                                                                                                  |
|    | <b>Goal Description</b> | Planning and administration is required for the successful implementation of CDBG and HOME programs.                                                                                                             |
| 12 | <b>Goal Name</b>        | Fair housing education and outreach                                                                                                                                                                              |
|    | <b>Goal Description</b> | Education and outreach on fair housing to affirmatively further fair housing choice.                                                                                                                             |
| 13 | <b>Goal Name</b>        | Economic development                                                                                                                                                                                             |
|    | <b>Goal Description</b> | Create a program that allows business owners in high-blighted downtown corridors to access funding for building security upgrades and facade improvements. Funding will be leveraged with other funding sources. |
| 14 | <b>Goal Name</b>        | Eliminate slum and blighting influences                                                                                                                                                                          |
|    | <b>Goal Description</b> | Demolish blighted unsafe structures.                                                                                                                                                                             |

## AP-35 Projects - 91.420, 91.220(d)

### Introduction

The following projects will be funded using federal CDBG, HOME and CDBG-CV funds:

| #  | Project Name                                       |
|----|----------------------------------------------------|
| 1  | CD2501 Administration                              |
| 2  | CD2502 Homeless Prevention                         |
| 3  | CD2503 Homeless Supportive Services                |
| 4  | CD2504 In Home Crisis Response-Boy's Town          |
| 5  | CD2505 Senior Transportation                       |
| 6  | CD2506 1500 BLK E Routt-Sidewalks/Curbs            |
| 7  | CD2507 200 BLK VanBuren Sidewalks                  |
| 9  | CD2509 ERESP                                       |
| 10 | <del>CD2510 Minor Repair Program</del>             |
| 11 | CD2511 Homeowner Rehab                             |
| 12 | CD2512 Abatement Dangerous Buildings               |
| 13 | CD2513 Neighborhood Improvements                   |
| 14 | CD2514 Small Business Assistance                   |
| 15 | <u>CD2515 Downtown Neighborhood Revitalization</u> |
|    |                                                    |
| 13 | HO2510 City Administration                         |
| 14 | HO2520 County Administration                       |
| 15 | HO2530 County Programs                             |
| 16 | HO2540 Community Housing Development Organization  |
| 17 | HO2550 City Programs                               |
| 18 | HO2560 City Match                                  |

Table 3 – Project Information

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

**AP-38 Project Summary**  
**Project Summary Information**

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|   |                                                                                                |                                                                                                                                                                                                                                                                            |
|---|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <b>Project Name</b>                                                                            | CD2501 Administration                                                                                                                                                                                                                                                      |
|   | <b>Target Area</b>                                                                             |                                                                                                                                                                                                                                                                            |
|   | <b>Goals Supported</b>                                                                         | Planning- and administration of federal programs                                                                                                                                                                                                                           |
|   | <b>Needs Addressed</b>                                                                         | Administration and Planning                                                                                                                                                                                                                                                |
|   | <b>Funding</b>                                                                                 | CDBG: \$ <del>285,000.00</del> <u>280,759.80</u>                                                                                                                                                                                                                           |
|   | <b>Description</b>                                                                             | Administrative and planning activities associated with the CDBG program, fair housing education, and outreach.                                                                                                                                                             |
|   | <b>Target Date</b>                                                                             | 9/30/2026                                                                                                                                                                                                                                                                  |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Administration of the program is essential to ensuring all funding is deployed.                                                                                                                                                                                            |
|   | <b>Location Description</b>                                                                    |                                                                                                                                                                                                                                                                            |
|   | <b>Planned Activities</b>                                                                      |                                                                                                                                                                                                                                                                            |
| 2 | <b>Project Name</b>                                                                            | CD2502 Homeless Prevention                                                                                                                                                                                                                                                 |
|   | <b>Target Area</b>                                                                             |                                                                                                                                                                                                                                                                            |
|   | <b>Goals Supported</b>                                                                         | Provide public services to non-homeless population                                                                                                                                                                                                                         |
|   | <b>Needs Addressed</b>                                                                         |                                                                                                                                                                                                                                                                            |
|   | <b>Funding</b>                                                                                 | : \$ <del>75,000</del> <u>73,834.90</u>                                                                                                                                                                                                                                    |
|   | <b>Description</b>                                                                             | The funding will assist low-income families cover their monthly rent and provide them with case management services in financial emergencies. This support aims to help families manage and maintain a budget, increase their income, and reduce the risk of homelessness. |
|   | <b>Target Date</b>                                                                             |                                                                                                                                                                                                                                                                            |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                                                                                                                                                                                                            |
|   | <b>Location Description</b>                                                                    |                                                                                                                                                                                                                                                                            |
|   | <b>Planned Activities</b>                                                                      |                                                                                                                                                                                                                                                                            |
| 3 | <b>Project Name</b>                                                                            | CD2503 Homeless Supportive Services                                                                                                                                                                                                                                        |
|   | <b>Target Area</b>                                                                             |                                                                                                                                                                                                                                                                            |

|   |                                                                                                |                                                                                                                                                                                                                                         |
|---|------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | <b>Goals Supported</b>                                                                         | Provide housing and services to homeless                                                                                                                                                                                                |
|   | <b>Needs Addressed</b>                                                                         | Public Services including Services for Homeless                                                                                                                                                                                         |
|   | <b>Funding</b>                                                                                 | : \$ <del>28,858.00</del> <u>28,409.70</u>                                                                                                                                                                                              |
|   | <b>Description</b>                                                                             | Funding will provide supportive services to low-income, newly unemployed, and homeless families and individuals. Supportive services include comprehensive case management services, basic needs assistance, and referrals and support. |
|   | <b>Target Date</b>                                                                             |                                                                                                                                                                                                                                         |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                                                                                                                                                                         |
|   | <b>Location Description</b>                                                                    |                                                                                                                                                                                                                                         |
|   | <b>Planned Activities</b>                                                                      |                                                                                                                                                                                                                                         |
| 4 | <b>Project Name</b>                                                                            | CD2504 In Home Crisis Response-Boy's Town                                                                                                                                                                                               |
|   | <b>Target Area</b>                                                                             |                                                                                                                                                                                                                                         |
|   | <b>Goals Supported</b>                                                                         |                                                                                                                                                                                                                                         |
|   | <b>Needs Addressed</b>                                                                         |                                                                                                                                                                                                                                         |
|   | <b>Funding</b>                                                                                 | : \$ <del>50,000.00</del> <u>49,223.27</u>                                                                                                                                                                                              |
|   | <b>Description</b>                                                                             |                                                                                                                                                                                                                                         |
|   | <b>Target Date</b>                                                                             |                                                                                                                                                                                                                                         |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                                                                                                                                                                         |
|   | <b>Location Description</b>                                                                    |                                                                                                                                                                                                                                         |
|   | <b>Planned Activities</b>                                                                      |                                                                                                                                                                                                                                         |
| 5 | <b>Project Name</b>                                                                            | CD2505 Senior Transportation                                                                                                                                                                                                            |
|   | <b>Target Area</b>                                                                             |                                                                                                                                                                                                                                         |
|   | <b>Goals Supported</b>                                                                         | Provide public services to non-homeless population                                                                                                                                                                                      |
|   | <b>Needs Addressed</b>                                                                         |                                                                                                                                                                                                                                         |

|   |                                                                                                |                                                                                           |
|---|------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
|   | <b>Funding</b>                                                                                 | : \$ <del>59,892.00</del> <u>58,961.60</u>                                                |
|   | <b>Description</b>                                                                             | This program allows for safe transport of the senior population for daily essentials.     |
|   | <b>Target Date</b>                                                                             |                                                                                           |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                           |
|   | <b>Location Description</b>                                                                    |                                                                                           |
|   | <b>Planned Activities</b>                                                                      |                                                                                           |
| 6 | <b>Project Name</b>                                                                            | CD2506 1500 BLK E Routt-Sidewalks/Curbs                                                   |
|   | <b>Target Area</b>                                                                             |                                                                                           |
|   | <b>Goals Supported</b>                                                                         | Improve and maintain public infrastructure and fac                                        |
|   | <b>Needs Addressed</b>                                                                         | Public Infrastructure and Facilities                                                      |
|   | <b>Funding</b>                                                                                 | : \$108,000.00                                                                            |
|   | <b>Description</b>                                                                             | This funding is dedicated to ADA-accessibility for sidewalks in the 1500 block of E Routt |
|   | <b>Target Date</b>                                                                             |                                                                                           |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                           |
|   | <b>Location Description</b>                                                                    |                                                                                           |
| 7 | <b>Project Name</b>                                                                            | CD2507 200 BLK VanBuren Sidewalks                                                         |
|   | <b>Target Area</b>                                                                             |                                                                                           |
|   | <b>Goals Supported</b>                                                                         | Improve and maintain public infrastructure and fac                                        |
|   | <b>Needs Addressed</b>                                                                         | Public Infrastructure and Facilities                                                      |
|   | <b>Funding</b>                                                                                 | : \$53,720.00                                                                             |
|   | <b>Description</b>                                                                             | ADA accessibility for sidewalks in the 200 block of VanBuren.                             |
|   | <b>Target Date</b>                                                                             |                                                                                           |

|          |                                                                                                |                                                                                                                                  |
|----------|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                                                                  |
|          | <b>Location Description</b>                                                                    |                                                                                                                                  |
|          | <b>Planned Activities</b>                                                                      |                                                                                                                                  |
| <b>8</b> | <b>Project Name</b>                                                                            | CD2508 Non Congregate Shelters                                                                                                   |
|          | <b>Target Area</b>                                                                             |                                                                                                                                  |
|          | <b>Goals Supported</b>                                                                         | Homeless Services                                                                                                                |
|          | <b>Needs Addressed</b>                                                                         | Affordable Housing                                                                                                               |
|          | <b>Funding</b>                                                                                 | : \$50,000.00                                                                                                                    |
|          | <b>Description</b>                                                                             | Create new non-congregate sheltering options for Pueblo's unhoused population                                                    |
|          | <b>Target Date</b>                                                                             |                                                                                                                                  |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                                                                  |
|          | <b>Location Description</b>                                                                    |                                                                                                                                  |
|          | <b>Planned Activities</b>                                                                      |                                                                                                                                  |
| <b>9</b> | <b>Project Name</b>                                                                            | CD2509 ERESP                                                                                                                     |
|          | <b>Target Area</b>                                                                             |                                                                                                                                  |
|          | <b>Goals Supported</b>                                                                         | Preserve existing affordable units (rehab)                                                                                       |
|          | <b>Needs Addressed</b>                                                                         | Affordable Housing                                                                                                               |
|          | <b>Funding</b>                                                                                 | : \$50,000.00                                                                                                                    |
|          | <b>Description</b>                                                                             | This funding is part of the emergency repairs and essential services program, which provides owner-occupied home rehabilitation. |
|          | <b>Target Date</b>                                                                             |                                                                                                                                  |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                                                                  |
|          | <b>Location Description</b>                                                                    |                                                                                                                                  |

|           |                                                                                                |                                                                                           |
|-----------|------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
|           | <b>Planned Activities</b>                                                                      |                                                                                           |
| <b>10</b> | <b>Project Name</b>                                                                            | CD2510 Minor Repair Program                                                               |
|           | <b>Target Area</b>                                                                             |                                                                                           |
|           | <b>Goals Supported</b>                                                                         | Preserve existing affordable units (rehab)                                                |
|           | <b>Needs Addressed</b>                                                                         | Affordable Housing                                                                        |
|           | <b>Funding</b>                                                                                 | : \$ <del>100,000.000.00</del>                                                            |
|           | <b>Description</b>                                                                             | This program provides essential repairs to maintain livability in existing housing units. |
|           | <b>Target Date</b>                                                                             |                                                                                           |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                           |
|           | <b>Location Description</b>                                                                    |                                                                                           |
|           | <b>Planned Activities</b>                                                                      |                                                                                           |
| <b>11</b> | <b>Project Name</b>                                                                            | CD2511 Homeowner Rehab                                                                    |
|           | <b>Target Area</b>                                                                             |                                                                                           |
|           | <b>Goals Supported</b>                                                                         |                                                                                           |
|           | <b>Needs Addressed</b>                                                                         |                                                                                           |
|           | <b>Funding</b>                                                                                 | : \$ <del>1</del> 200,000.00                                                              |
|           | <b>Description</b>                                                                             | Provide home rehabilitation for owner-occupied housing.                                   |
|           | <b>Target Date</b>                                                                             |                                                                                           |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                           |
|           | <b>Location Description</b>                                                                    |                                                                                           |
|           | <b>Planned Activities</b>                                                                      |                                                                                           |
| <b>12</b> | <b>Project Name</b>                                                                            | CD2512 Abatement Dangerous Buildings                                                      |
|           | <b>Target Area</b>                                                                             |                                                                                           |
|           | <b>Goals Supported</b>                                                                         | Preserve existing affordable units (rehab)                                                |

|    |                                                                                                |                                                                                          |
|----|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
|    | <b>Needs Addressed</b>                                                                         |                                                                                          |
|    | <b>Funding</b>                                                                                 | : \$ <del>300,000.00</del> <u>228,890.73</u>                                             |
|    | <b>Description</b>                                                                             | Important maintenance and upgrades to abate dangerous conditions in existing structures. |
|    | <b>Target Date</b>                                                                             |                                                                                          |
|    | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                          |
|    | <b>Location Description</b>                                                                    |                                                                                          |
|    | <b>Planned Activities</b>                                                                      |                                                                                          |
| 13 | <b>Project Name</b>                                                                            | CD2513 Neighborhood Improvements                                                         |
|    | <b>Target Area</b>                                                                             |                                                                                          |
|    | <b>Goals Supported</b>                                                                         | Neighborhood Revitalization                                                              |
|    | <b>Needs Addressed</b>                                                                         |                                                                                          |
|    | <b>Funding</b>                                                                                 | \$21,999.00                                                                              |
|    | <b>Description</b>                                                                             |                                                                                          |
|    | <b>Target Date</b>                                                                             |                                                                                          |
|    | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                          |
|    | <b>Location Description</b>                                                                    |                                                                                          |
|    | <b>Planned Activities</b>                                                                      |                                                                                          |
| 14 | <b>Project Name</b>                                                                            | CD2514 Small Business Assistance                                                         |
|    | <b>Target Area</b>                                                                             |                                                                                          |
|    | <b>Goals Supported</b>                                                                         | Economic Development                                                                     |
|    | <b>Needs Addressed</b>                                                                         |                                                                                          |
|    | <b>Funding</b>                                                                                 | : \$ <del>150,000.00</del> <u>.00</u>                                                    |

|           |                                                                                                       |                                                                  |
|-----------|-------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
|           | <b>Description</b>                                                                                    | Façade improvements to blighted commercial corridors.            |
|           | <b>Target Date</b>                                                                                    |                                                                  |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b>        |                                                                  |
|           | <b>Location Description</b>                                                                           |                                                                  |
|           | <b>Planned Activities</b>                                                                             |                                                                  |
|           |                                                                                                       |                                                                  |
| <b>15</b> | <b><u>Project Name</u></b>                                                                            | <u>CD2515 Downtown Neighborhood Revitalization</u>               |
|           | <b><u>Target Area</u></b>                                                                             |                                                                  |
|           | <b><u>Goals Supported</u></b>                                                                         | <u>Economic Development</u>                                      |
|           | <b><u>Needs Addressed</u></b>                                                                         |                                                                  |
|           | <b><u>Funding</u></b>                                                                                 | <u>: \$200,000.00</u>                                            |
|           | <b><u>Description</u></b>                                                                             | <u>Improve Blighted Commercial and Residential Neighborhoods</u> |
|           | <b><u>Target Date</u></b>                                                                             |                                                                  |
|           | <b><u>Estimate the number and type of families that will benefit from the proposed activities</u></b> |                                                                  |
|           | <b><u>Location Description</u></b>                                                                    |                                                                  |
|           | <b><u>Planned Activities</u></b>                                                                      |                                                                  |
| <b>16</b> | <b>Project Name</b>                                                                                   | HO2510 City Administration                                       |
|           | <b>Target Area</b>                                                                                    |                                                                  |
|           | <b>Goals Supported</b>                                                                                | Planning and administration of federal programs                  |
|           | <b>Needs Addressed</b>                                                                                | Administration and Planning                                      |
|           | <b>Funding</b>                                                                                        | : \$76346.43                                                     |
|           | <b>Description</b>                                                                                    | City administration of HOME allocation.                          |
|           | <b>Target Date</b>                                                                                    |                                                                  |

|           |                                                                                                |                                                               |
|-----------|------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                               |
|           | <b>Location Description</b>                                                                    |                                                               |
|           | <b>Planned Activities</b>                                                                      |                                                               |
| <b>17</b> | <b>Project Name</b>                                                                            | HO2520 County Administration                                  |
|           | <b>Target Area</b>                                                                             |                                                               |
|           | <b>Goals Supported</b>                                                                         | Planning and administration of federal programs               |
|           | <b>Needs Addressed</b>                                                                         | Administration and Planning                                   |
|           | <b>Funding</b>                                                                                 | : \$11,408.09                                                 |
|           | <b>Description</b>                                                                             | County administration of HOME funding.                        |
|           | <b>Target Date</b>                                                                             |                                                               |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                               |
|           | <b>Location Description</b>                                                                    |                                                               |
|           | <b>Planned Activities</b>                                                                      |                                                               |
| <b>18</b> | <b>Project Name</b>                                                                            | HO2530 County Programs                                        |
|           | <b>Target Area</b>                                                                             |                                                               |
|           | <b>Goals Supported</b>                                                                         |                                                               |
|           | <b>Needs Addressed</b>                                                                         |                                                               |
|           | <b>Funding</b>                                                                                 | : \$ <del>85,560.65</del> 85,560.65                           |
|           | <b>Description</b>                                                                             | Programs to support affordable housing through Pueblo County. |
|           | <b>Target Date</b>                                                                             |                                                               |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                               |
|           | <b>Location Description</b>                                                                    |                                                               |
|           | <b>Planned Activities</b>                                                                      |                                                               |

|    |                                                                                                |                                                   |
|----|------------------------------------------------------------------------------------------------|---------------------------------------------------|
| 19 | <b>Project Name</b>                                                                            | HO2540 Community Housing Development Organization |
|    | <b>Target Area</b>                                                                             |                                                   |
|    | <b>Goals Supported</b>                                                                         |                                                   |
|    | <b>Needs Addressed</b>                                                                         |                                                   |
|    | <b>Funding</b>                                                                                 | : \$131,631.77                                    |
|    | <b>Description</b>                                                                             |                                                   |
|    | <b>Target Date</b>                                                                             |                                                   |
|    | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                   |
|    | <b>Location Description</b>                                                                    |                                                   |
|    | <b>Planned Activities</b>                                                                      |                                                   |
| 20 | <b>Project Name</b>                                                                            | HO2550 City Programs                              |
|    | <b>Target Area</b>                                                                             |                                                   |
|    | <b>Goals Supported</b>                                                                         |                                                   |
|    | <b>Needs Addressed</b>                                                                         |                                                   |
|    | <b>Funding</b>                                                                                 | : \$ <u>572,598.20</u> <u>537,425.30</u>          |
|    | <b>Description</b>                                                                             |                                                   |
|    | <b>Target Date</b>                                                                             |                                                   |
|    | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                   |
|    | <b>Location Description</b>                                                                    |                                                   |
|    | <b>Planned Activities</b>                                                                      |                                                   |
| 21 | <b>Project Name</b>                                                                            | HO2560 City Match                                 |
|    | <b>Target Area</b>                                                                             |                                                   |
|    | <b>Goals Supported</b>                                                                         |                                                   |
|    | <b>Needs Addressed</b>                                                                         |                                                   |

|    |                                                                                                       |                                                                                                                                       |
|----|-------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
|    | <b>Funding</b>                                                                                        | : \$176,057.49                                                                                                                        |
|    | <b>Description</b>                                                                                    |                                                                                                                                       |
|    | <b>Target Date</b>                                                                                    |                                                                                                                                       |
|    | <b>Estimate the number and type of families that will benefit from the proposed activities</b>        |                                                                                                                                       |
|    | <b>Location Description</b>                                                                           |                                                                                                                                       |
|    | <b>Planned Activities</b>                                                                             |                                                                                                                                       |
| 22 | <b><u>Project Name</u></b>                                                                            | <u>HO2570 CHDO Operating</u>                                                                                                          |
|    | <b><u>Target Area</u></b>                                                                             | <u>Citywide</u>                                                                                                                       |
|    | <b><u>Goals Supported</u></b>                                                                         | <u>New construction of affordable housing</u>                                                                                         |
|    | <b><u>Needs Addressed</u></b>                                                                         | <u>Affordable Housing</u>                                                                                                             |
|    | <b><u>Funding</u></b>                                                                                 | <u>: \$43,877.25</u>                                                                                                                  |
|    | <b><u>Description</u></b>                                                                             | <u>Operational funding for Community Housing Development Organizations</u>                                                            |
|    | <b><u>Target Date</u></b>                                                                             | <u>12/31/2026</u>                                                                                                                     |
|    | <b><u>Estimate the number and type of families that will benefit from the proposed activities</u></b> | <u>It is estimated that 25 families will benefit from the creation of new affordable housing units within the Pueblo City Limits.</u> |
|    | <b><u>Location Description</u></b>                                                                    | <u>City Limits</u>                                                                                                                    |
|    | <b><u>Planned Activities</u></b>                                                                      | <u>CHDO Operational Funding</u>                                                                                                       |

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

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

There are no geographic areas in which assistance will be targeted. Applications are received from community members and agencies independent of location and are taken into consideration if the proposed projects fulfill the federal requirements of the programs.

### **Geographic Distribution**

| <b>Target Area</b> | <b>Percentage of Funds</b> |
|--------------------|----------------------------|
| Citywide           | 92                         |
| Countywide         | 8                          |

**Table 4 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

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

### **Discussion**

## Affordable Housing

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

#### Introduction

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

| One Year Goals for the Number of Households to be Supported |     |
|-------------------------------------------------------------|-----|
| Homeless                                                    | 200 |
| Non-Homeless                                                | 0   |
| Special-Needs                                               | 0   |
| Total                                                       | 200 |

Table 5 - One Year Goals for Affordable Housing by Support Requirement

| One Year Goals for the Number of Households Supported Through |    |
|---------------------------------------------------------------|----|
| Rental Assistance                                             | 10 |
| The Production of New Units                                   | 2  |
| Rehab of Existing Units                                       | 20 |
| Acquisition of Existing Units                                 | 0  |
| Total                                                         | 32 |

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

#### Discussion

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

HOME applications for affordable housing development will be taken monthly on a rolling basis, as projects are being developed. DHCS will review HOME Program applications in accordance with the Application checklist and on the following criteria:

- Affordable Housing Experience: Capacity must be demonstrated by including an application that identifies all necessary components to accomplish the development, e.g., effective control of sites for acquisition and construction developments, the financial capacity to repay the HOME loan and other financial arrangements, as well as comprehensive program design. DHCS's HOME Program staff will

conduct reviews of:

a. Previous performance under the HOME Program and other related programs, including disbursements, monitoring and findings;

b. Relevant experience in administering housing programs;

c. Relevant experience in developing and managing housing programs and;

d. Size of staff relative to all other program responsibilities.

- **Housing Need Factor:** The need factor pertains to percentages of the city's lower income households, the percentage of households with housing costs greater than thirty percent (30%) of area median family income adjusted for family size.
- **Financing:** DHCS places a strong emphasis on projects that will include the use of funds from other sources. All costs will be examined for reasonableness, and applicants may be denied if costs are deemed unreasonable.

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

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

Program and services funding available through the CDBG Program is awarded through an annual NOFA process.

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

### **Introduction**

Actions planned will address the needs to public housing.

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

Over the last six years, the HACP has been executing a four-phased Rental Assistance Demonstration (RAD) project, which converts a 212-unit Public Housing development into four separate projects. The HACP has been successful in leveraging public/private partnerships and funding for each of the phases. The City of Pueblo has used entitlement funding for each of the three completed projects and anticipates an application for the fourth phase when the HACP is awarded tax credit equity.

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

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

HACP also administers the Family Self-Sufficiency Program, which is a five-year voluntary program for participants in both the Housing Choice Voucher and the Public Housing programs. The program is designed to help individuals with improving their economic status by reducing their dependence on public assistance.

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

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

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

Not applicable as the HACP is not designated as troubled.

### **Discussion**

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

### **Introduction**

The City of Pueblo is committed to supporting individuals experiencing homelessness or at risk of becoming homeless through various initiatives. These efforts focus on shelter services, prevention programs, and outreach strategies.

#### **1. Homeless Services**

The City of Pueblo owns and operates the community's only homeless shelter, with wraparound services coordinated by the Department of Community and Human Services (DCHS). Funding for shelter operations is available through the Community Development Block Grant (CDBG) program, with additional capital upgrades planned through both CDBG and HOME funding sources.

#### **2. Homelessness Prevention**

Through partnerships with nonprofit organizations, the CDBG program provides financial support for eviction prevention efforts, helping individuals and families remain stably housed.

#### **3. Outreach Efforts**

The City also supports outreach initiatives, including CDBG-funded programs such as youth outreach, designed to connect vulnerable populations with essential services.

By leveraging local resources and funding opportunities, the City of Pueblo remains committed to addressing homelessness through coordinated services, prevention strategies, and targeted outreach.

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

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

The Pueblo CoC, which is part of the Colorado Balance of State, has a long-term goal of decreasing the number of persons experiencing homelessness by moving individuals and families from homelessness into permanent housing. To achieve this objective, the CoC meets regularly to monitor, discuss ongoing needs and issues that affect those impacted by homelessness. Health Solutions serves as the lead CoC agency and provides outreach to assess the individual needs of those experiencing homelessness. The CoC is engaging in the Built for Zero campaign, which is an approach that seeks to end homelessness

using a By-Names list for each subcategory (i.e. veterans, families, etc.).

## **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City of Pueblo is actively addressing emergency shelter and transitional housing needs for individuals experiencing homelessness through a combination of shelter services, prevention initiatives, and outreach efforts.

### **Emergency Shelter Services**

The City owns and operates Pueblo's only homeless shelter, ensuring access to safe and stable temporary housing. Wraparound services are coordinated by the Department of Community and Human Services (DCHS) to provide comprehensive support. Funding for shelter operations is available through the Community Development Block Grant (CDBG) program, with additional capital upgrades planned using both CDBG and HOME funding sources.

### **Transitional Housing & Prevention Efforts**

To support long-term stability, the City collaborates with nonprofit partners to prevent homelessness through eviction prevention programs funded by the CDBG program. These efforts help individuals and families avoid displacement and transition to stable housing.

### **Outreach & Community Engagement**

Recognizing the importance of outreach, the City funds initiatives such as youth outreach programs through CDBG, ensuring that vulnerable populations receive access to resources that promote stability and reintegration into the community.

By leveraging local resources and funding opportunities, the City of Pueblo remains committed to providing both immediate shelter and long-term housing solutions for individuals experiencing homelessness.

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

The City of Pueblo remains committed to ensuring housing stability and providing critical assistance to individuals experiencing homelessness or at risk of becoming homeless. These efforts focus on three key

areas:

### 1. Homeless Services

The City owns and operates Pueblo's only homeless shelter, with wraparound services coordinated by the Department of Community and Human Services (DCHS). Shelter operations are supported through Community Development Block Grant (CDBG) funding, with additional capital upgrades planned using both CDBG and HOME funding.

### 2. Homelessness Prevention

Through strategic partnerships with nonprofit organizations, the City invests CDBG funds in eviction prevention programs, helping residents maintain stable housing and avoid displacement.

### 3. Outreach Initiatives

The City supports various outreach efforts, including youth outreach programs, homelessness prevention services, and operational funding for housing providers—all made possible through CDBG funding.

Despite these ongoing efforts, **funding remains the primary challenge** in expanding housing and support services for individuals and families experiencing homelessness. This issue is expected to intensify as eviction moratoria are lifted, leading to an increase in displacement.

The City of Pueblo remains dedicated to investing CDBG funds strategically to provide essential services and address the evolving needs of the community.

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

The City of Pueblo remains committed to ensuring housing stability and providing critical assistance to individuals experiencing homelessness or at risk of becoming homeless. These efforts focus on three key areas:

### 1. Homeless Services

The City owns and operates Pueblo's only homeless shelter, with wraparound services coordinated by the Department of Community and Human Services (DCHS). Shelter operations are supported through

Community Development Block Grant (CDBG) funding, with additional capital upgrades planned using both CDBG and HOME funding.

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Through strategic partnerships with nonprofit organizations, the City invests CDBG funds in eviction prevention programs, helping residents maintain stable housing and avoid displacement.

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The City of Pueblo remains dedicated to investing CDBG funds strategically to provide essential services and address the evolving needs of the community.

## **Discussion**

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

### **Introduction**

The City of Pueblo recently completed an in-depth Analysis of Impediments to Affordable Housing, identifying critical barriers—from restrictive land-use controls and zoning ordinances to burdensome fees and outdated building codes—that limit access to affordable housing. The study not only highlights these challenges but also proposes actionable solutions designed to ameliorate the negative effects of current public policies, paving the way for a more robust and equitable housing market.

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

The City is actively working to remove barriers to affordable housing, including:

- **Zoning and Land Use Reforms:** The City of Pueblo is actively revising its zoning ordinances through the update of its Unified Development Code (UDC). The goal is to relax restrictions on multifamily housing—especially in infill areas—and to expand the definition of “family” so that more flexible occupancy arrangements are allowed. In addition, the plan includes permitting manufactured or modular housing on lots traditionally reserved for single-family dwellings. Similar revisions are being pursued at the county level to encourage a wider range of housing developments.
- **Modernizing Building Codes and Construction Standards:** To reduce overall development costs and improve the return on residential investment, the City is exploring adjustments in building codes and energy standards. This initiative involves assessing alternative construction methods (such as offsite manufacturing, panelized construction, and repurposed shipping containers) that can lower material, labor, and time costs for affordable housing projects.
- **Financial Incentives and Streamlined Development Processes:** Both the City and County are working on creating incentive policies, including fee waivers, tax abatements, and reduced permit costs. These measures aim to lessen the financial burdens imposed by current fees and charges, encouraging private investment in affordable housing. The City’s recent award of a Local Capacity Planning Grant from the Department of Local Affairs supports this effort, enabling faster project approvals and more coordinated collaboration among departments.
- **Utilization and Management of Public Land:** The local government intends to reform its acquisition and disposition policies regarding city-owned real estate. By acquiring land at favorable rates and offering it to developers with incentive packages, the City aims to remove barriers related to land cost and availability, thus facilitating new residential infill development.
- **Coordinated Planning and Funding Strategies:** Finally, by leveraging regional comprehensive planning processes and programs such as CDBG, HOME, and State Proposition 123, the City and County are pursuing multiple funding streams to address affordability gaps. These coordinated

efforts include enhanced communication and streamlined administrative procedures among local agencies, which help mitigate the restrictive growth limitations and tax policies that currently impact housing development.

## **Discussion**

DRAFT

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

### **Introduction**

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

### **Actions planned to address obstacles to meeting underserved needs**

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

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

The City of Pueblo will continue to partner with other public agencies and non-profit organizations, when feasible, to leverage resources and maximize outcomes in housing and community development.

Lastly, the City and the County contribute approximately \$1m annually toward funding various public services agencies. While the need remains greater than the available resources, funding is critical in the community.

### **Actions planned to foster and maintain affordable housing**

The City will utilize its CDBG funds to implement the DHCS's five housing strategies. Specifically, the CDBG funding will be used to help preserve Pueblo's aging and dilapidated housing stock. This is done through several housing rehabilitation programs, including programs for seniors and for persons needing accessibility modifications to age in place. The CDBG funding is leveraged using both City of Pueblo general funding and paired with state and other grant funding opportunities available. These housing rehabilitation programs work to maintain the quality of the affordable housing stock occupied by low- and moderate-income households.

The City may also use CDBG or HOME funding to implement other housing strategies, which include:

1. **Boarded, Blighted & Burnt** – Identify redevelopment solutions for homes that need demolition due to lack of maintenance, condemnation, structural failure, or fires.
2. **Rehabilitation** – Preserve existing housing stock by expanding funding for low- and moderate-income homeowners who need home repairs.
3. **Infrastructure** – Assist with infrastructure fees for affordable housing development. Add infrastructure to existing City-owned vacant parcels to create development-ready properties.

4. **Blighted Commercial** – Assist with the acquisition and demolition of properties with large vacant commercial buildings to make sites ready for redevelopment of high-density residential units.
5. **Homeless Housing Options** – Create transitional housing options for individuals exiting homelessness, including non-congregate sheltering options and support for Rapid Re-Housing and Permanent Supportive Housing.

Additionally, the City will utilize HOME funds toward the new construction of rental units in the Compass Pointe Development.

### **Actions planned to reduce lead-based paint hazards**

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

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

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

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

### **Actions planned to reduce the number of poverty-level families**

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

- continue to work to coordinate community development strategies, needs assessments and

integrated planning.

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

### **Actions planned to develop institutional structure**

The City of Pueblo is committed to the continued coordination of all Anti-Poverty and Community Development initiatives. The City has entered into several intergovernmental agreements with other entities such as Pueblo County to administer the CSAC process, which allocates general revenue funds from both entities to non-profit agencies and economic development organizations that enhance the quality of life in the community.

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

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

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

### **Discussion**

## Program Specific Requirements

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

#### Introduction

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

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

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

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

#### Other CDBG Requirements

- |                                                                                                                                                                                                                                                                                                                                                                                                   |         |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------|
| 1. The amount of urgent need activities                                                                                                                                                                                                                                                                                                                                                           | 0       |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 100.00% |

#### HOME Investment Partnership Program (HOME)

##### Reference 24 CFR 91.220(I)(2)

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

The County does not anticipate receiving any additional program income for its HOME programs

during FY 2025.

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

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

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

The City of Pueblo elects to enforce the Recapture Provisions of the HOME Program, recapturing the direct HOME subsidy under the following conditions:

The City of Pueblo will recapture the direct subsidy amount of the HOME Program funds provided to the homebuyer/homeowner on an approved activity or recapture the maximum net proceeds from sale of property (whether recapture is affected through foreclosure or no foreclosure action).

- When net proceed exceed superior debt and the amount of direct HOME subsidy invested, the City will recapture the entire direct HOME subsidy provided.
- When net proceeds are insufficient to cover superior debt, the direct HOME subsidy will be forgiven.
- When net proceeds are insufficient to reimburse the entire direct HOME subsidy provided, but are in excess of the superior debt, the balance (Direct Subsidy – Net Proceeds) will be recaptured by the City.

Net proceeds recovered will be used to:

(1) Reimburse the HOME Program (approved activity) for the outstanding balance of HOME funds not repaid or forgiven during the applicable affordability period at the time of recapture.

(2) Reimburse the HOME Program (administration) for "holding costs" or other costs associated with the recapture action (legal fees, insurance, taxes, realtor fees, appraisal/BPO costs, etc.). If net proceeds recaptured are less than the outstanding balance of the direct HOME subsidy invested in

the property (for all approved activities and holding costs incurred), the loss will be absorbed by the HOME Program and all HOME Program requirements would be considered to have been satisfied. If net proceeds recaptured are greater than the outstanding balance of direct HOME subsidy invested in the property (for all approved activities and holding costs incurred), the balance of net proceeds will be distributed to the homeowner (or his/her estate). If the recapture of proceeds is effectuated through a completed foreclosure action, and the property is legally owned by the City of Pueblo, the balance of net proceeds recaptured will inure to the City of Pueblo.

For those cases where the affordability requirements are violated as a result of the death of the HOME beneficiary and there is an eligible person who qualified and is desirous of assuming the HOME assistance invested in the property, DHCS will permit sale of the HOME-assisted unit to the qualifying, eligible person, contingent upon DHCS's prior review and approval. The subsequent owner will be required to adhere to all applicable affordability requirements for the unexpired term of the original affordability period.

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

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

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

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

The Consortium does not permit the use of HOME funds to refinance existing debt secured by

multifamily or single-family housing that is being rehabilitated with HOME funds.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

The City of Pueblo does not directly administer HOME TBRA. Any preferences outlined would be based on the subrecipient's policies and procedures administering TBRA. Tenant selection plans are reviewed as part of a TBRA allocation.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

The City of Pueblo does not directly administer HOME TBRA. Any preferences outlined would be based on the subrecipient's policies and procedures administering TBRA. Tenant selection plans are reviewed as part of a TBRA allocation.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

The City of Pueblo does not directly administer HOME TBRA. Any preferences outlined would be based on the subrecipient's policies and procedures administering TBRA. Tenant selection plans are reviewed as part of a TBRA allocation.



## Draft 2025 Annual Action Plan

Attachment A

| Community Development Block Grant Program Funds       |                                            |                       |                 |                 |
|-------------------------------------------------------|--------------------------------------------|-----------------------|-----------------|-----------------|
| 2025                                                  | <u>Estimated</u> CDBG Allocation           |                       | \$ 1,403,799.00 | \$ (28,670.00)  |
| Project No.                                           | Project Name                               | Project Agency        | Amount          | Difference      |
| <b>Public Services</b>                                |                                            |                       |                 |                 |
| CD2501                                                | Administration                             | DHCS                  | \$ 280,759.80   | \$ (4,240.20)   |
| CD2502                                                | Homeless Prevention                        | Posada                | \$ 73,834.90    | \$ (1,165.10)   |
| CD2503                                                | Homeless Supportive Services               | Posada                | \$ 28,409.70    | \$ (448.30)     |
| CD2504                                                | Boy's Town                                 | Catholic Charities    | \$ 49,223.27    | \$ (776.73)     |
| CD2505                                                | Senior Transportation                      | SRDA                  | \$ 58,961.60    | \$ (930.40)     |
| <b>Public Facilities/Neighborhood Improvements</b>    |                                            |                       |                 |                 |
| CD2506                                                | 1500 BLK E Routt-Sidewalks/Curbs           | Beverly Ballage       | \$ 108,000.00   | \$ -            |
| CD2507                                                | 200 BLK VanBuren Sidewalks                 | Natalie Zamora        | \$ 53,720.00    | \$ -            |
| CD2508                                                | Non Congregate Shelters                    | City of Pueblo        | \$ 50,000.00    | \$ -            |
| CD2513                                                | Neighborhood Improvements                  | City of Pueblo        | \$ 21,999.00    | \$ -            |
| CD2515                                                | Downtown Neighborhood Revitalization       | City of Pueblo        | \$ 200,000.00   | \$ 200,000.00   |
| <b>Housing Activities</b>                             |                                            |                       |                 |                 |
| CD2509                                                | ERESP                                      | Pueblo County         | \$ 50,000.00    | \$ -            |
| CD2510                                                | Minor Repair                               | DHCS                  | \$ -            | \$ (100,000.00) |
| CD2511                                                | Homeowner Rehab                            | DHCS                  | \$ 200,000.00   | \$ 100,000.00   |
| CD2512                                                | Abatement Dangerous Buildings              | DHCS                  | \$ 228,890.73   | \$ (71,109.27)  |
| <b>Economic Developemnt</b>                           |                                            |                       |                 |                 |
| CD2514                                                | Small Business Assistance                  | DHCS                  | \$ -            | \$ (150,000.00) |
|                                                       |                                            |                       |                 |                 |
|                                                       |                                            |                       |                 |                 |
|                                                       |                                            | CDBG Total            | \$ 1,403,799.00 | \$ (28,670.00)  |
|                                                       |                                            |                       |                 |                 |
|                                                       |                                            |                       |                 |                 |
| <b>HOME Partnership Investement Act Program Funds</b> |                                            |                       |                 |                 |
| 2025                                                  | <u>Estimated</u> HUD HOME Allocation       |                       | \$ 877,545.14   | Difference      |
| Project No.                                           | Project Name                               | Project Agency        | Amount          |                 |
| HO2510                                                | City Administration                        | City of Pueblo        | \$ 76,346.43    | \$ -            |
| HO2520                                                | County Administration                      | Pueblo County         | \$ 11,408.09    | \$ -            |
| HO2530                                                | County Programs                            | Pueblo County         | \$ 79,856.30    | \$ (5,704.35)   |
| HO2540                                                | Community Housing Development Organization | TBD                   | \$ 131,631.77   | \$ -            |
| HO2550                                                | City Programs                              | City of Pueblo        | \$ 534,425.30   | \$ (38,172.90)  |
| HO2560                                                | City Match                                 | City of Pueblo        | \$ 176,057.49   | \$ -            |
| HO2570                                                | CHDO Operating                             | TBD                   | \$ 43,877.25    | \$ 43,877.25    |
|                                                       |                                            | Allocation w/ City Ma | \$ 1,053,602.63 |                 |



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# 2024 ANNUAL ACTION PLAN SUBSTANTIAL AMENDMENT - DRAFT

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Community Development Block Grant (CDBG), HOME Consortium



**Draft Display December 10, 2025 – January 12, 2026, at 5:00 p.m.**

# Executive Summary

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

### 1. Introduction

The City of Pueblo is part of the U.S. Department of Housing and Urban Development's Community Development Block Grant (CDBG) Program. The City and Pueblo County work together as a Consortium within the HOME Investment Partnerships Program.

As an entitlement community under the CDBG Program, the City of Pueblo must prepare an Annual Plan to implement federal programs that fund housing, community development, and economic development. This Plan covers FY 2024 (March 1, 2024, through ~~February 28~~September 30, 2025). Following a 30-day comment period, the city will submit the Plan for approval by the U.S. Department of Housing and Urban Development.

The Annual Action Plan aims to guide federal funding decisions in Pueblo. The Plan is centered around three main goals:

1. Provide decent housing by preserving affordable housing, increasing its availability, reducing discriminatory barriers, and aiding homeless individuals and families.
2. Develop a suitable living environment by improving neighborhoods, integrating low- and moderate-income residents throughout the city, and reinvesting in deteriorating communities.
3. Expand economic opportunities through job creation, homeownership opportunities, and activities that promote long-term community viability.

The primary priority for using federal funds is to increase self-sufficiency and economic opportunity for lower-income residents and individuals with special needs.

The City of Pueblo expects to receive the following federal resources in FY 2024:

- Community Development Block Grant funds: \$1,453,413
- HOME Investment Partnership funds: \$880,344

The goals and results outlined in the 2024 Annual Action Plan are connected to the 2020-2024 Consolidated Plan's Strategic Plan. The planned activities aim to meet the City's needs using CDBG and HOME funds and concentrate on offering affordable housing, improving living conditions, and enhancing economic prospects. The results of these activities will demonstrate the advantages of each funded program.

All activities in Pueblo will support at least one objective and one outcome. The priorities identified in the 2020-2024 Consolidated Plan include affordable housing, public services, public infrastructure and facilities, economic development, community revitalization, fair housing education and outreach, and administration and planning.

## 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The goals and results outlined in the 2024 Annual Action Plan are connected to the 2020-2024 Consolidated Plan's Strategic Plan. The planned activities aim to meet the City's needs using CDBG and HOME funds and concentrate on offering affordable housing, improving living conditions, and enhancing economic prospects. The results of these activities will demonstrate the advantages of each funded program.

All activities in Pueblo will support at least one objective and one outcome. The priorities identified in the 2020-2024 Consolidated Plan include affordable housing, public services, public infrastructure and facilities, economic development, community revitalization, fair housing education and outreach, and administration and planning.

## 3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The evaluation of past performance covers the period from March 1, 2023, through February 28, 2024. The City's past performance based on the Consolidated Annual Performance and Evaluation Report (CAPER) highlighted accomplishments achieved through the expenditure of CDBG, CDBG-CV, and HOME funds. It also mentioned areas where the City fell short of its program year goals. The most recent Annual ~~Performance~~Performance Evaluation noted ~~deficiencies~~deficiencies in two primary area:

CR-20 emphasizes the need for comprehensive narratives, detailing the actual households benefiting from CDBG and HOME funds, along with the households supported. An evaluation was not completed which should cover progress in achieving specific affordable housing objectives for various owner and renter households, addressing concerns like high rent burdens, substandard housing, involuntary displacement, and disabilities.

- Efforts to address worst case needs was not discussed or progress in meeting the needs of persons with disabilities.
- The number of middle-income persons served were not addressed.
- The number of homeless persons served were not addressed

The City also exceeded its administrative cap in PY2016, 2017, and 2018. This is an account error and is not a result of excessive expenses.

The City will address these issues in its response to the APA.

#### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The city utilizes a grassroots approach for engagement to direct CDBG funding to low-income households and households within low-income communities. The City's Division of Housing and Citizen Services participates in many diverse groups and committees throughout the year to coordinate funding and funding opportunities and to let people know what is available in the community and who is the best point of contact for the type of service needed. The Division participates in the following community-based commissions, committees, and workgroups:

- Community Commission on Housing and Homelessness (6 meetings per year)
- Housing Workgroup (monthly)Shift the Narrative Workgroup (monthly)Neighbors In Need Workgroup (monthly)
- The DICE Team (weekly meeting)
- The ADA Advisory Committee (monthly meeting)
- Community Services Advisory Commission (monthly meeting)
- Housing Update Call with the State Division of Housing (monthly call)
- Coordination with the Housing Authority on housing needs and grant applications (HUD and EPA)
- 2/13/24 Meeting at CHFA Housing Summit, Denver with developer Kittle Group in reference to PAB and housing development
- 6/20/24 - Meetings with developer Posada to develop the Oasis Apartments
- 7/3/24 Meeting with Archway Development for two projects within the City

The Division offices with the Pueblo County Department of Human Services and closely coordinates with LEAP, Weatherization, TANIF, Commodities Distribution, and other social service programs offered.

Funding availability is published in the Pueblo Chieftain in both english and spanish and on the city's main webpage. A public hearing and presentation meeting is held for the applicants to present their proposed projects to the Citizen's Advisory Committee. The Committee is made up of community volunteers from each city council district. The Committee ranks the application in accordance with Consolidated Plan using a rubric that connects to the Consolidated Plan's identified needs and associated goals.

#### **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The city received comments and presentations from (19) citizens and non-profit groups requesting funding for proposed projects.

The City received one comment during the availability of the Draft 2024 Annual Action Plan suggesting that the City should use more of its funds for economic development.

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

All comments were accepted.

#### **7. Summary**

The Division of Housing and Citizen Services is a highly active unit that works directly with other Departments, government entities, non-profit housing and service providers, and the general public through direct service. The City has established a grassroots approach to making funding available and directed to low-income citizens and neighborhood comprised of low-income citizens. The City has an excellent track record of delivering funding benefitting low-income individuals and families utilizing at or above 90% of the funding benefitting low-income citizens. The balance of the funding going towards spot slum and blight within low income areas which most residents would consider a benefit.

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

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

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

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

**Table 1 – Responsible Agencies**

### Narrative

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

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

### Consolidated Plan Public Contact Information

Bryan Gallagher, Administrator  
City of Pueblo Division of Housing and Citizen Services  
2631 E. 4th Street

Pueblo, CO 81001  
Phone: 719-553-2850  
Email: [housing@pueblo.us](mailto:housing@pueblo.us)

DRAFT

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

### **1. Introduction**

The City of Pueblo's Division of Housing and Citizen Services created an outreach program to gather input from a wide range of stakeholders. The program involved public meetings, published meeting notices, and stakeholder/focus group meetings designed to involve a diverse group of stakeholders and city residents in line with the Citizen Participation Plan.

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

It is becoming increasingly important to have meaningful collaboration in the development and implementation of housing and community development programs. Rising costs are stretching the federal resources allocated to these programs. Collaborating with housing and service providers helps the city maximize the benefits of its investments. It ensures that these investments strategically address both short-term needs and long-term goals. The Division of Housing and Citizen Services regularly consults with human services agencies, housing development organizations, and municipal departments throughout the program year.

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

Pueblo is part of the statewide State Continuum of Care and receives funding through the statewide balance. Locally, Pueblo is represented at the State Continuum of Care by housing and service providers who work to meet the needs of people experiencing homelessness and strive to find a local solution to end homelessness. The city regularly communicates with housing and service providers.

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

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

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

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**Table 2 – Agencies, groups, organizations who participated**

|   |                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                 |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <b>Agency/Group/Organization</b>                                                                                                                                   | POSADA, INC.                                                                                                                                                                                                                                                                                                                                    |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                              | Services - Housing<br>Services-Elderly Persons<br>Services-Persons with Disabilities<br>Services-homeless                                                                                                                                                                                                                                       |
|   | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth<br>Homelessness Strategy                                                                                                                                                                                                   |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The Division of Housing and Citizen Services consulted with the agency throughout the year during large, coordinated meetings, one-on-one meetings, and while monitoring ongoing projects. The expected outcome was to coordinate funding to enable the agency and other complementing agencies to address the homeless issues within the city. |
| 2 | <b>Agency/Group/Organization</b>                                                                                                                                   | Pueblo Rescue Mission                                                                                                                                                                                                                                                                                                                           |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                              | Services-homeless                                                                                                                                                                                                                                                                                                                               |
|   | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Homeless Needs - Chronically homeless<br>Homelessness Needs - Veterans<br>Homelessness Strategy                                                                                                                                                                                                                                                 |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The Division of Housing and Citizen Services consulted with the agency throughout the year during large, coordinated meetings, one-on-one meetings, and during monitoring reviews of ongoing projects. The anticipated outcome was coordinating with the agency to serve the homeless community.                                                |

|   |                                                                                                                                                                    |                                                                                                                                                                                                                                                                                   |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3 | <b>Agency/Group/Organization</b>                                                                                                                                   | SRDA Pueblo, Inc.                                                                                                                                                                                                                                                                 |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                              | Services - Housing<br>Services-Elderly Persons                                                                                                                                                                                                                                    |
|   | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Non-Homeless Special Needs                                                                                                                                                                                                                                                        |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The Division of Housing and Citizen Services consulted with the agency one-on-one and during the monitoring review of ongoing projects. The anticipated outcome was the coordination of funding to allow the agency to address issues affecting elderly citizens within the city. |
| 4 | <b>Agency/Group/Organization</b>                                                                                                                                   | Colorado Legal Services                                                                                                                                                                                                                                                           |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                              | Housing<br>Service-Fair Housing                                                                                                                                                                                                                                                   |
|   | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Homelessness Strategy<br>Eviction Prevention                                                                                                                                                                                                                                      |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The Division of Housing and Citizen Services consulted with the agency for one-on-one consultations and coordinated intergovernmental agency consultations. The goal of the consultation was to coordinate funding and develop wraparound services to keep families housed.       |
| 5 | <b>Agency/Group/Organization</b>                                                                                                                                   | Housing Authority of the City of Pueblo                                                                                                                                                                                                                                           |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                              | Housing<br>PHA<br>Services - Housing<br>Services-homeless                                                                                                                                                                                                                         |

|                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Public Housing Needs<br>Homelessness Strategy<br>Housing Development                                                                                                                                                                                                                                                                                                    |
| <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | The Division of Housing and Citizen Services consulted with the agency throughout the year during one-on-one meetings and monitoring reviews of ongoing projects. The anticipated outcome was the production of additional units and the coordination of LIHTC funding. Additionally, the City coordinated with the Authority on grant applications to the EPA and HUD. |

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

None excluded

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

| <b>Name of Plan</b> | <b>Lead Organization</b> | <b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b> |
|---------------------|--------------------------|-------------------------------------------------------------------------------------|
| Continuum of Care   | Health Solutions         | The goals of the Consolidated Plan align with the efforts of the CoC.               |

**Table 3 – Other local / regional / federal planning efforts**

**Narrative**

The CoC has been included as a key stakeholder in the development of the Con-Plan, HOME-ARP Plan, the Strategic Housing Assessment and this AAP.

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

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The city utilizes a grassroots approach for engagement to direct CDBG funding to low-income households and households within low-income communities. The City's Division of Housing and Citizen Services participates in many diverse groups and committees throughout the year to coordinate funding and funding opportunities and to let people know what is available in the community and who is the best point of contact for the type of service needed. The Division participates in the following community-based commissions, committees, and workgroups:

- Community Commission on Housing and Homelessness (6 meetings per year)
- Housing Workgroup (monthly)Shift the Narrative Workgroup (monthly)Neighbors In Need Workgroup (monthly)
- The DICE Team (weekly meeting)
- The ADA Advisory Committee (monthly meeting)
- Community Services Advisory Commission (monthly meeting)
- Housing Update Call with the State Division of Housing (monthly call)
- 2/13/24 Meeting at CHFA Housing Summit, Denver with developer Kittle Group in reference to PAB and housing development
- 6/20/24 - Meetings with developer Posada to develop the Oasis Apartments
- 7/3/24 Meeting with Archway Development for two projects within the City

The Division offices with the Pueblo County Department of Human Services and closely coordinates with LEAP, Weatherization, TANIF, Commodities Distribution, and other social service programs offered.

Funding availability is published in the Pueblo Chieftain in both english and spanish and on the city's main webpage. A public hearing and presentation meeting is held for the applicants to present their proposed projects to the Citizen's Advisory Committee. The Committee is made up of community volunteers from each city council district. The Committee ranks the application in accordance with Consolidated Plan using a rubric that connects to the Consolidated Plan's identified needs and associated goals.

## Citizen Participation Outreach

| Sort Order | Mode of Outreach | Target of Outreach                                      | Summary of response/attendance                                            | Summary of comments received                                     | Summary of comments not accepted and reasons                                 | URL (If applicable)                     |
|------------|------------------|---------------------------------------------------------|---------------------------------------------------------------------------|------------------------------------------------------------------|------------------------------------------------------------------------------|-----------------------------------------|
| 1          | Newspaper Ad     | Non-targeted /broad community                           | Notice of funding availability open from May 1, 2023 through May 31, 2023 | Applications for programs and projects included in this 2024 AAP | All applications were accepted; not all applications were able to be funded. | Link and application on City's Homepage |
| 2          | Newspaper Ad     | Non-English Speaking - Specify other language : Spanish | Notice of funding availability open from May 1, 2023 through May 31, 2023 | Applications for programs and projects included in this 2024 AAP | All applications were accepted; not all applications were able to be funded. | Link and application on City's Homepage |
| 3          | Newspaper Ad     | Non-targeted /broad community                           | Notice of Public Hearing to receive public input on use of funding.       | None                                                             | None                                                                         |                                         |

| Sort Order | Mode of Outreach  | Target of Outreach            | Summary of response/attendance                                                                              | Summary of comments received                                                                   | Summary of comments not accepted and reasons | URL (If applicable)                                                                                                                                                                                         |
|------------|-------------------|-------------------------------|-------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4          | Public Hearing    | Non-targeted /broad community | A public hearing held in City Council Chambers following the grant request presentations.                   | Nineteen individuals were present and presented for themselves or the groups they represented. | None                                         | Streamed Live on Zoom                                                                                                                                                                                       |
| 5          | Public Meeting    | Non-targeted /broad community | Work Session with City Council on televised meeting and replayed for two weeks on the City Gov. Channel 17. | None                                                                                           | None                                         | City Clerk is inviting you to a scheduled Zoom meeting.<br>Join Zoom Meeting<br><a href="https://pueblo.zoom.us/j/83497433064">https://pueblo.zoom.us/j/83497433064</a> Meeting ID: 834 9743 3064 Passcode: |
| 6          | Internet Outreach | Non-targeted /broad community | City Council Work Session streamed live on Facebook.                                                        | None                                                                                           | None                                         |                                                                                                                                                                                                             |

| Sort Order | Mode of Outreach | Target of Outreach            | Summary of response/attendance                                                                                                                                      | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable)                                                                                                                                                                 |
|------------|------------------|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 7          | Newspaper Ad     | Non-targeted /broad community | Notice of availability for Draft Annual Action Plan - available at the Division's Office, Rawlings Library, the City Clerk's Office, and on the Division's website. | One comment was received     | All comments were accepted                   | <a href="https://www.pueblo.us/DocumentCenter/View/24322/2023-Annual-action-plan-PDF?bidId=">https://www.pueblo.us/DocumentCenter/View/24322/2023-Annual-action-plan-PDF?bidId=</a> |

| Sort Order | Mode of Outreach | Target of Outreach                                      | Summary of response/attendance                                                                                                                                      | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable)                                                                                                                                                                 |
|------------|------------------|---------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 8          | Newspaper Ad     | Non-English Speaking - Specify other language : Spanish | Notice of availability for Draft Annual Action Plan - available at the Division's Office, Rawlings Library, the City Clerk's Office, and on the Division's website. | None                         | None                                         | <a href="https://www.pueblo.us/DocumentCenter/View/24322/2023-Annual-action-plan-PDF?bidId=">https://www.pueblo.us/DocumentCenter/View/24322/2023-Annual-action-plan-PDF?bidId=</a> |
| 9          | Public Hearing   | Non-targeted /broad community                           | City Council Meeting Aug 12, 2024 - Ordinance to adopt 2024 Annual Action Plan                                                                                      | None                         | None                                         |                                                                                                                                                                                     |

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

The City of Pueblo will use its allocation and program income to further the goals identified in the 2020-2024 Consolidated Plan.

#### Anticipated Resources

| Program | Source of Funds  | Uses of Funds                                                                                                  | Expected Amount Available Year 1 |                    |                          |              | Expected Amount Available Remainder of ConPlan \$ | Narrative Description                                                                                         |
|---------|------------------|----------------------------------------------------------------------------------------------------------------|----------------------------------|--------------------|--------------------------|--------------|---------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|         |                  |                                                                                                                | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$    |                                                   |                                                                                                               |
| CDBG    | public - federal | Acquisition<br>Admin and Planning<br>Economic Development<br>Housing<br>Public Improvements<br>Public Services | 1,453,413.00                     | 0.00               | 0.00                     | 1,453,413.00 | 0.00                                              | Community Development Block Group 2024 Allocation. This is the final year of the 2020-2024 Consolidated Plan. |

| Program | Source of Funds  | Uses of Funds                                                                                                                                                       | Expected Amount Available Year 1 |                    |                          |            | Expected Amount Available Remainder of ConPlan \$ | Narrative Description                                                                                        |
|---------|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|--------------------|--------------------------|------------|---------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
|         |                  |                                                                                                                                                                     | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$  |                                                   |                                                                                                              |
| HOME    | public - federal | Acquisition<br>Homebuyer assistance<br>Homeowner rehab<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership<br>TBRA | 880,344.35                       | 0.00               | 0.00                     | 880,344.35 | 0.00                                              | HOME Investment Partnership Funds 2024 Allocation. This is the final year of the 2020-2024 Consolidated Plan |
| Other   | public - federal | Acquisition<br>Admin and Planning<br>Housing<br>Public Services<br>Other                                                                                            | 0.00                             | 0.00               | 0.00                     | 0.00       | 0.00                                              | The City of Pueblo will utilize the CV funds to respond to issue exacerbated by the COVID-19 Pandemic        |

**Table 2 - Expected Resources – Priority Table**

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

CDBG funds will leverage funds in the Public Service sector. Combined with \$950,000 in local funds from the City and Pueblo County, the CDBG funds will be leveraged by the non-profits to fund the services utilized within the community. HOME funds will be leveraged with other capital

stack investments to create housing units in partnership with the community and investors. The match to the HOME Grant was provided by Ordinance No. 10608 adopted on 11/27/2023. The city adopted its annual budget on that date, included with the 2024 General Operating Budget for the City of the Pueblo (page D-78) was the funding for the HOME match.

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

The City has acquired a property at 1302 E 5th Street, Pueblo, CO 81001 using ARPA funds, the property will be developed into affordable housing. Through a grant received by the Colorado Housing Finance Authority a preliminary design is being developed for potential investors.

**Discussion**

The activities included in the 2024 Annual Action Plan and the associated funding will be dedicated to achieving the goals identified in the Consolidated Plan. Funding contained in this AAP will serve:

Public services in the areas of homelessness, eviction prevention, shelter, budgeting, mentoring, and senior transportation.

Neighborhood improvements requested by citizens is the sidewalk replacement on Crystal Place and in the Grove Neighborhood.

Accessibility improvements are planned for ADA curb ramp replacements, Belmont Neighborhood.

Three housing programs will be funded to make necessary repairs to owner-occupied housing.

## Annual Goals and Objectives

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

#### Goals Summary Information

| Sort Order | Goal Name                                          | Start Year | End Year | Category                                                                                    | Geographic Area | Needs Addressed                                 | Funding            | Goal Outcome Indicator                                                                                  |
|------------|----------------------------------------------------|------------|----------|---------------------------------------------------------------------------------------------|-----------------|-------------------------------------------------|--------------------|---------------------------------------------------------------------------------------------------------|
| 2          | New construction of affordable housing             | 2020       | 2024     | Affordable Housing                                                                          | Citywide        | Affordable Housing                              | HOME: \$792,310.35 | Rental units constructed: 4 Household Housing Unit<br>Homeowner Housing Added: 1 Household Housing Unit |
| 3          | Preserve existing affordable units (rehab)         | 2020       | 2024     | Affordable Housing                                                                          | Citywide        | Affordable Housing                              | CDBG: \$183,413.00 | Homeowner Housing Rehabilitated: 23 Household Housing Unit                                              |
| 5          | Provide housing and services to homeless/ near     | 2020       | 2024     | Affordable Housing<br>Homeless                                                              | Citywide        | Public Services including Services for Homeless | CDBG: \$133,745.00 | Public service activities other than Low/Moderate Income Housing Benefit: 875 Persons Assisted          |
| 6          | Provide public services to non-homeless population | 2020       | 2024     | Affordable Housing<br>Non-Homeless<br>Special Needs<br>Non-Housing<br>Community Development | Citywide        | Public Services including Services for Homeless | CDBG: \$80,005.00  | Public service activities other than Low/Moderate Income Housing Benefit: 368 Persons Assisted          |

| Sort Order | Goal Name                                          | Start Year | End Year | Category                                                                                                               | Geographic Area        | Needs Addressed                      | Funding                                 | Goal Outcome Indicator                                                                                            |
|------------|----------------------------------------------------|------------|----------|------------------------------------------------------------------------------------------------------------------------|------------------------|--------------------------------------|-----------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| 7          | Improve and maintain public infrastructure and fac | 2020       | 2024     | Non-Housing Community Development                                                                                      | Citywide               | Public Infrastructure and Facilities | CDBG: \$766,250.00                      | Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 597 Persons Assisted |
| 11         | Planning and administration of federal programs    | 2020       | 2024     | Affordable Housing<br>Public Housing<br>Homeless<br>Non-Homeless<br>Special Needs<br>Non-Housing Community Development | Citywide<br>Countywide | Administration and Planning          | CDBG: \$290,000.00<br>HOME: \$88,034.00 | Other: 1 Other                                                                                                    |

**Table 3 – Goals Summary**

## Goal Descriptions

|   |                  |                                                                                                                                                                                                                         |
|---|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2 | Goal Name        | New construction of affordable housing                                                                                                                                                                                  |
|   | Goal Description | New construction of affordable housing units.                                                                                                                                                                           |
| 3 | Goal Name        | Preserve existing affordable units (rehab)                                                                                                                                                                              |
|   | Goal Description | Rehabilitation/reconstruction of single and multi-family housing; energy efficiency improvements; accessibility modifications; lead-based paint abatement; minor housing repairs; and preservation of affordable units. |

|    |                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|----|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5  | <b>Goal Name</b>        | Provide housing and services to homeless/ near                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|    | <b>Goal Description</b> | Housing and services for the homeless and near homeless include outreach, emergency, transitional, and permanent supportive housing, Rapid Re-Housing, supporting services, and rental assistance.                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 6  | <b>Goal Name</b>        | Provide public services to non-homeless population                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|    | <b>Goal Description</b> | Other public services that are needed include housing and services for persons with HIV/AIDS; services for persons with physical, developmental, and intellectual disabilities; employment and workforce development; screening for lead-based paint hazards; housing counseling; neighborhood clean-up programs; crime awareness and prevention programs; transportation; health and mental health services; services for persons recovering from addiction; youth programs, food banks and other food-related services; childcare and related services; senior programs and related services; legal services; and financial literacy. |
| 7  | <b>Goal Name</b>        | Improve and maintain public infrastructure and fac                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|    | <b>Goal Description</b> | <p>Public facilities include neighborhood, parks/recreation, parking, senior and youth, childcare, job training, cultural, non-residential historic preservation, and homeless facilities.</p> <p>Public infrastructure includes:</p> <ul style="list-style-type: none"> <li>• Street and sidewalk improvements.</li> <li>• Lighting and streetscaping.</li> <li>• Water and sewer improvements.</li> <li>• Flood drainage improvements.</li> <li>• Solid waste management improvements.</li> </ul>                                                                                                                                     |
| 11 | <b>Goal Name</b>        | Planning and administration of federal programs                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|    | <b>Goal Description</b> | Planning and administration for the successful implementation of CDBG and HOME programs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |



## AP-35 Projects - 91.420, 91.220(d)

### Introduction

#### Introduction

The following is a list of the planned projects the City will fund with CDBG and HOME funds.

#### Project Name

- 1 CD2401 Administration
- 2 CD2402 Homeless Prevention
- 3 CD2403 Homeless Supportive Services
- 4 CD2404 Homeless Youth Services
- 5 CD2405 Catholic Charities Teen Mentoring
- 6 CD2406 SRDA Senior Transportation
- 7 CD2407 Crystal Place Sidewalks
- 8 CD2408 Grove Neighborhood Improvements
- 9 CD2409 ADA Curb Ramp Project 1
- 10 CD2410 ADA Curb Ramps Project 2
- 11 CD2411 Emergency Repair and Essential Services Program for Seniors
- 12 CD2412 Minor Repairs Program
- 13 CD2413 Rehabilitation Program
- 14 CD2414 Eastside Childcare Facility Improvements

| #  | Project Name                                                       |
|----|--------------------------------------------------------------------|
| 1  | CD2401 Administration                                              |
| 2  | CD2402 Homeless Prevention                                         |
| 3  | CD2403 Homeless Supportive Services                                |
| 4  | CD2404 Homeless Youth Services                                     |
| 5  | CD2405 It's All About Being a Teen                                 |
| 6  | CD2406 SRDA Senior Transportation                                  |
| 7  | CD2407 Crystal Place Sidewalk Replacement                          |
| 8  | CD2408 Grove Neighborhood Infrastructure Improvements              |
| 9  | CD2409 ADA Curb Project I                                          |
| 10 | CD2410 ADA Curb Ramps Project II                                   |
| 11 | CD2411 Emergency Repair and Essential Services Program for Seniors |
| 12 | CD2412 Minor Repairs Program                                       |
| 13 | CD2413 Housing Rehabilitation Program                              |
| 14 | CD2414 Eastside Child Care Improvements                            |
| 15 | CD2415 Posada Parking Lot Improvements                             |

| #         | Project Name                                              |
|-----------|-----------------------------------------------------------|
| 16        | HO2410 - City HOME Administration                         |
| 17        | HO2420 Pueblo County HOME Administration                  |
| 18        | HO2430 - Pueblo County Housing Programs                   |
| 19        | HO2440 Community Development Housing Organization Project |
| 20        | HO2450 - City Housing Programs                            |
| <u>21</u> | <u>HO2470 – CHDO Operating</u>                            |

**Table 4 – Project Information**

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

**AP-38 Project Summary**  
**Project Summary Information**

|   |                                                                                                |                                                                                                                                                                                                                                                                            |
|---|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <b>Project Name</b>                                                                            | CD2401 Administration                                                                                                                                                                                                                                                      |
|   | <b>Target Area</b>                                                                             | Citywide<br>Countywide                                                                                                                                                                                                                                                     |
|   | <b>Goals Supported</b>                                                                         | Planning and administration of federal programs                                                                                                                                                                                                                            |
|   | <b>Needs Addressed</b>                                                                         | Administration and Planning                                                                                                                                                                                                                                                |
|   | <b>Funding</b>                                                                                 | CDBG: \$290,000.00                                                                                                                                                                                                                                                         |
|   | <b>Description</b>                                                                             | Administrative and planning activities associated with the CDBG program, fair housing education, and outreach.                                                                                                                                                             |
|   | <b>Target Date</b>                                                                             | 2/28/2025                                                                                                                                                                                                                                                                  |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | N/A - Administration activity                                                                                                                                                                                                                                              |
|   | <b>Location Description</b>                                                                    | Administration of the grant funds will occur at 2631 E 4th Street, Pueblo, CO 81001 (CT11, BLK1)                                                                                                                                                                           |
| 2 | <b>Planned Activities</b>                                                                      | Administrative and planning activities associated with the CDBG program and fair housing education and outreach.                                                                                                                                                           |
|   | <b>Project Name</b>                                                                            | CD2402 Homeless Prevention                                                                                                                                                                                                                                                 |
|   | <b>Target Area</b>                                                                             | Citywide                                                                                                                                                                                                                                                                   |
|   | <b>Goals Supported</b>                                                                         | Provide housing and services to homeless/ near                                                                                                                                                                                                                             |
|   | <b>Needs Addressed</b>                                                                         | Public Services including Services for Homeless                                                                                                                                                                                                                            |
|   | <b>Funding</b>                                                                                 | CDBG: \$23,745.00                                                                                                                                                                                                                                                          |
|   | <b>Description</b>                                                                             | The funding will assist low-income families cover their monthly rent and provide them with case management services in financial emergencies. This support aims to help families manage and maintain a budget, increase their income, and reduce the risk of homelessness. |
|   | <b>Target Date</b>                                                                             | 12/31/2025                                                                                                                                                                                                                                                                 |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Up to 25 individuals and families will benefit from the proposed activity.                                                                                                                                                                                                 |

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|          | <b>Location Description</b>                                                                    | Services provided at 501 Belmont Avenue, Pueblo, CO (CT18, BLK 1)                                                                                                                                                                       |
|          | <b>Planned Activities</b>                                                                      | Provide case management and one-time subsistence payment for rent or mortgage arrears, including utilities covering up to a (3) month period.                                                                                           |
| <b>3</b> | <b>Project Name</b>                                                                            | CD2403 Homeless Supportive Services                                                                                                                                                                                                     |
|          | <b>Target Area</b>                                                                             | Citywide                                                                                                                                                                                                                                |
|          | <b>Goals Supported</b>                                                                         | Provide housing and services to homeless/ near                                                                                                                                                                                          |
|          | <b>Needs Addressed</b>                                                                         | Public Services including Services for Homeless                                                                                                                                                                                         |
|          | <b>Funding</b>                                                                                 | CDBG: \$75,000.00                                                                                                                                                                                                                       |
|          | <b>Description</b>                                                                             | Funding will provide supportive services to low-income, newly unemployed, and homeless families and individuals. Supportive services include comprehensive case management services, basic needs assistance, and referrals and support. |
|          | <b>Target Date</b>                                                                             | 12/31/2025                                                                                                                                                                                                                              |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Provide service and case management to 750 unduplicated individuals over the year.                                                                                                                                                      |
|          | <b>Location Description</b>                                                                    | Services offered at 501 Belmont Ave, Pueblo, CO 81004 (CT18, BLK 1)                                                                                                                                                                     |
|          | <b>Planned Activities</b>                                                                      | Supportive services include comprehensive case management services, basic needs assistance and referrals and support.                                                                                                                   |
| <b>4</b> | <b>Project Name</b>                                                                            | CD2404 Homeless Youth Services                                                                                                                                                                                                          |
|          | <b>Target Area</b>                                                                             | Citywide                                                                                                                                                                                                                                |
|          | <b>Goals Supported</b>                                                                         | Provide housing and services to homeless/ near                                                                                                                                                                                          |
|          | <b>Needs Addressed</b>                                                                         | Public Services including Services for Homeless                                                                                                                                                                                         |
|          | <b>Funding</b>                                                                                 | CDBG: \$35,000.00                                                                                                                                                                                                                       |

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|          | <b>Description</b>                                                                             | The funding will provide case management and services for homeless youth, including emergency shelter, transitional housing, supportive services, basic services, transportation, assistance with obtaining IDs and birth certificates, reunification support, case management in collaboration with housing, education, employment services, life skills classes, and supplies.                       |
|          | <b>Target Date</b>                                                                             | 12/31/2025                                                                                                                                                                                                                                                                                                                                                                                             |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Provide service and case management to 100 unduplicated individuals (Youth 18-25) over the year. 100 Individuals (Youth 18-25) will benefit from the activity.                                                                                                                                                                                                                                         |
|          | <b>Location Description</b>                                                                    | Services offered at 501 Belmont Ave, Pueblo, CO 81004 (CT18, BLK 1)                                                                                                                                                                                                                                                                                                                                    |
|          | <b>Planned Activities</b>                                                                      | Funding will be used for the provision of case management and services for homeless youth, including emergency shelter, transitional housing supportive services, basic services, transportation, assistance with IDs and birth certificates, reunification, case management in conjunction with housing, education and employment services, life skills classes, and supplies for the homeless youth. |
| <b>5</b> | <b>Project Name</b>                                                                            | CD2405 It's All About Being a Teen                                                                                                                                                                                                                                                                                                                                                                     |
|          | <b>Target Area</b>                                                                             | Citywide                                                                                                                                                                                                                                                                                                                                                                                               |
|          | <b>Goals Supported</b>                                                                         | Provide public services to non-homeless population                                                                                                                                                                                                                                                                                                                                                     |
|          | <b>Needs Addressed</b>                                                                         | Public Services including Services for Homeless                                                                                                                                                                                                                                                                                                                                                        |
|          | <b>Funding</b>                                                                                 | CDBG: \$50,005.00                                                                                                                                                                                                                                                                                                                                                                                      |

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|  | <b>Description</b>                                                                             | <p>Catholic Charities of Southern Colorado (CCSoCo) will utilize funding for the agency's All About Being a Teen program. It's All About Being a Teen (IAABAT) is a dynamic interactive class designed to increase positive self-worth, personal empowerment, self-discipline, empathy, healthy attachments, and resilient-protective behaviors. Many of the families we serve have backgrounds rooted in trauma, poverty, gender and racial disparities, and limited access to resources. These characteristics contribute to teens experiencing greater percentages of risk factors and violence. Youth violence is linked to negative health and well-being outcomes and disproportionately impacts communities of color which are very prevalent in Pueblo. Violence increases the risk for behavioral and mental health difficulties including future violence perpetration and victimization, smoking, substance use, high-risk sexual behavior, depression, academic difficulties, school dropout, and suicide. It's All About Being a Teen was developed for young people at risk of disturbed and delinquent behaviors. The lessons help this population understand, define, and choose healthy and nurturing lifestyles. Through self-report inventories, role-play, discussions, and creative expression, teens in the program will address risk factors like peer pressure and bullies, substance use, and behavioral/mental health problems. Funding will support a combination of program supplies, operational expenses, and staffing costs. Operational costs include items needed to prepare hot meals for participants prior to the class time, The staff positions which would be incorporated include the Nurturing Parenting Program Coordinator (30%), a Program Facilitator (35%), and a Youth Facilitator (50%).</p> |
|  | <b>Target Date</b>                                                                             | 2/28/2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|  | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | CCSoCo plans to serve 54 teens through 3 sixteen-week classes during this grant period. This is an increase of about 9-10 teens for the coming program year.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|  | <b>Location Description</b>                                                                    | The project will be facilitated at 429 W. 10th Street, Pueblo, CO 81003 (CT6, BLK 1)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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|  | <b>Planned Activities</b> | <p>It's All About Being a Teen encompasses 99 lessons categorized into 15 competencies. The course will run 16 weeks, three times per year, and serve on average 18 youth per cohort for a yearly total of 54 participants. The sessions will last three hours, which will include a mealtime (a hot meal is provided preceding each class). The program only hosts one session per week because it offers adequate exposure to course materials without overloading. The teens have the opportunity to practice what they learn through homework assignments. Our program will be held on Fridays and will not compete with school commitments. Neither of the local school districts (District 60 and District 70) hold classes on Fridays. The weekly, semester-long course will balance the needed exposure for impact with consideration for retention and keeping the target population engaged.</p> <p>Although it was initially designed by the evidence-based Nurturing Parenting Program as a tertiary intervention (i.e. working with individual who have already experienced maltreatment, correctional issues, etc.), for the purpose of our program and our population, we use the It's All About Being a Teen program as a secondary intervention. This means that our target population consists of teens who are at high-risk (or have increased risk factors) of experiencing maltreatment, abuse, mental health issues, correctional issues, and more. This approach takes a more preventative stance which improves chances for ultimately positive outcomes for the teens involved in the program.</p> <p>The target population for this program (high-risk youth) typically experiences high instances of generational poverty, gender and racial disparities, limited access to resources and education, and in many cases, trauma. CCSoco is Pueblo's designated Family Resource Center (FRC). As such, we use a Family Strengthening approach to increase protective factors and build upon the strengths of the youth and families we serve. The IAABAT program helps to increase protective factors by providing teens with opportunities to practice association with prosocial peers, gain skills and opportunities in solving problems non-violently, and build high self-esteem. Class text is individualized and developed by the participant using reflection activities as they apply the course material to their own life and values. Activities are aimed at helping teens understand their values and self-worth along with what's happening in the world and relationships around them. We have experienced tremendous success in our programs due to the inclusivity</p> |
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|   |                                                                                                | of the entire family so that no one family member is struggling in a silo to work toward self-sufficiency and well-being.                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 6 | <b>Project Name</b>                                                                            | CD2406 SRDA Senior Transportation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|   | <b>Target Area</b>                                                                             | Citywide                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|   | <b>Goals Supported</b>                                                                         | Provide public services to non-homeless population                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|   | <b>Needs Addressed</b>                                                                         | Public Services including Services for Homeless                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|   | <b>Funding</b>                                                                                 | CDBG: \$30,000.00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|   | <b>Description</b>                                                                             | The SRDA Transportation program is planning to purchase a twelve-passenger vehicle equipped to accommodate five wheelchairs. The CDBG funding will provide 20% of the funds required to secure the vehicle, and CDOT (Colorado Department of Transportation) will provide the balance of the funds needed. This purchase is part of SRDA's vehicle replacement schedule, allowing them to replace older, higher-cost, higher-mileage vehicles in their fleet. Additionally, the funds may fuel the existing fleet providing daily service. |
|   | <b>Target Date</b>                                                                             | 6/1/2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 314 Individuals will be served by the program.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|   | <b>Location Description</b>                                                                    | The program will be operated from the SRDA facilities at 230 N. Union Avenue, Pueblo, CO 81003                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|   | <b>Planned Activities</b>                                                                      | The Program will provide transportation for seniors to needed appointments and essentials.                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 7 | <b>Project Name</b>                                                                            | CD2407 Crystal Place Sidewalk Replacement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|   | <b>Target Area</b>                                                                             | Citywide                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|   | <b>Goals Supported</b>                                                                         | Improve and maintain public infrastructure and fac                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|   | <b>Needs Addressed</b>                                                                         | Public Infrastructure and Facilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|   | <b>Funding</b>                                                                                 | CDBG: <del>\$107,500.00</del> <u>61,851.00</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|   | <b>Description</b>                                                                             | Replace the deteriorated sidewalk and install ADA curb ramps on both sides of Crystal Place on the one-block street between Lake Avenue and the Bessemer Ditch. Improve ADA pedestrian poles/traffic signals at the intersection of Orman and Jones Avenues.                                                                                                                                                                                                                                                                               |
|   | <b>Target Date</b>                                                                             | 2/28/2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Nineteen families will be assisted by this project.                                                            |
|          | <b>Location Description</b>                                                                    |                                                                                                                |
|          | <b>Planned Activities</b>                                                                      | Sidewalk replacement and installation of ADA curb ramps.                                                       |
| <b>8</b> | <b>Project Name</b>                                                                            | CD2408 Grove Neighborhood Infrastructure Improvements                                                          |
|          | <b>Target Area</b>                                                                             | Citywide                                                                                                       |
|          | <b>Goals Supported</b>                                                                         | Improve and maintain public infrastructure and fac                                                             |
|          | <b>Needs Addressed</b>                                                                         | Public Infrastructure and Facilities                                                                           |
|          | <b>Funding</b>                                                                                 | CDBG: \$153,600.00                                                                                             |
|          | <b>Description</b>                                                                             | Selective replace the deteriorated sidewalk and installation ADA curb ramps throughout the Grove Neighborhood. |
|          | <b>Target Date</b>                                                                             | 5/30/2025                                                                                                      |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Twenty-five families will benefit from the project.                                                            |
|          | <b>Location Description</b>                                                                    | Bound by Rush, Palm, Clark, Spring, and Plum Streets between the levee and C Streets (CT35, BLK 1).            |
|          | <b>Planned Activities</b>                                                                      | Sidewalk replacement and installation of ADA curb ramps.                                                       |
| <b>9</b> | <b>Project Name</b>                                                                            | CD2409 ADA Curb Project I                                                                                      |
|          | <b>Target Area</b>                                                                             | Citywide                                                                                                       |
|          | <b>Goals Supported</b>                                                                         | Improve and maintain public infrastructure and fac                                                             |
|          | <b>Needs Addressed</b>                                                                         | Public Infrastructure and Facilities                                                                           |
|          | <b>Funding</b>                                                                                 | CDBG: \$200,000.00                                                                                             |

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|           | <b>Description</b>                                                                             | Install ADA-compliant accessible curb ramps at street intersections and crosswalks in the Belmont neighborhood along Bonforte Blvd. The project will entail the replacement of existing curb and gutter, concrete cross pans, asphalt repair, striping, decorative concrete and retaining walls, signage, disturbed landscaping, and irrigation. The project may include the relocation of existing street lighting, signal lights, associated electrical boxes, and wiring. Relocation of adjacent utilities may be required to complete the proposed project.                                                         |
|           | <b>Target Date</b>                                                                             | 12/31/2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | The project will install 10 ADA compliant curb ramps.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|           | <b>Location Description</b>                                                                    | The project will replace multiple ADA curb ramps in Census Tract 9.02 BLK 1 (56.9% LMI) and Census Tract 9.04 BLK 1 (59.7% LMI).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|           | <b>Planned Activities</b>                                                                      | The project will entail replacing the existing curb and gutter, 7" concrete cross pans, 4" asphalt repair, striping, decorative concrete and retaining walls, signage, disturbed landscaping, and irrigation. It may also include relocating existing street lighting, signal lights, associated electrical boxes, and wiring. Relocating adjacent utilities may be required to complete the proposed project.                                                                                                                                                                                                          |
| <b>10</b> | <b>Project Name</b>                                                                            | CD2410 ADA Curb Ramps Project II                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|           | <b>Target Area</b>                                                                             | Citywide                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|           | <b>Goals Supported</b>                                                                         | Improve and maintain public infrastructure and fac                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|           | <b>Needs Addressed</b>                                                                         | Public Infrastructure and Facilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|           | <b>Funding</b>                                                                                 | CDBG: \$200,000.00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|           | <b>Description</b>                                                                             | Install ADA-compliant accessible curb ramps at street intersections and crosswalks throughout the City of Pueblo. Install a connecting sidewalk between ADA ramps where a sidewalk does not exist. The project will entail the replacement of existing curb and gutter, concrete cross pans, asphalt repair, striping, decorative concrete and retaining walls, signage, disturbed landscaping, and irrigation. The project may include relocating existing street lighting, signal lights, associated electrical boxes, and wiring. Relocation of adjacent utilities may be required to complete the proposed project. |
|           | <b>Target Date</b>                                                                             | 12/31/2024                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 15 ADA Curb Ramps will be installed. The project will help the community and allow the City to comply with American's with Disabilities Act.                                                                                                                                                                                                                                                                                                                                                                                                         |
|           | <b>Location Description</b>                                                                    | The project will replace multiple ADA curb ramps in Census Tract 9.02 BLK 1 (56.9% LMI) and Census Tract 9.04 BLK 1 (59.7% LMI)                                                                                                                                                                                                                                                                                                                                                                                                                      |
|           | <b>Planned Activities</b>                                                                      | The project will entail replacing the existing curb and gutter, 7" concrete cross pans, 4" asphalt repair, striping, decorative concrete and retaining walls, signage, disturbed landscaping, and irrigation. It may also include relocating existing street lighting, signal lights, associated electrical boxes, and wiring. Relocating adjacent utilities may be required to complete the proposed project.                                                                                                                                       |
| <b>11</b> | <b>Project Name</b>                                                                            | CD2411 Emergency Repair and Essential Services Program for Seniors                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|           | <b>Target Area</b>                                                                             | Citywide                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|           | <b>Goals Supported</b>                                                                         | Preserve existing affordable units (rehab)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|           | <b>Needs Addressed</b>                                                                         | Affordable Housing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|           | <b>Funding</b>                                                                                 | CDBG: \$40,000.00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|           | <b>Description</b>                                                                             | The ERESP program is a successful emergency rehabilitation program in its 22nd year. The program has assisted over 873 senior citizens. The CDBG funds will provide emergency repairs to low-income senior households within the Pueblo City limits. ERESP provides emergency repairs for faulty plumbing, lack of water and heat, faulty electrical wiring, leaking roofs, and other emergencies. There has also been a tremendous increase in demand for accessibility modifications such as handrails, ramps, handicapped showers, and grab bars. |
|           | <b>Target Date</b>                                                                             | 12/31/2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Eight low to moderate income elderly household will be served by this project.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|           | <b>Location Description</b>                                                                    | The project will assis participants with in the city limits.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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|           | <b>Planned Activities</b>                                                                      | ERESP offers emergency repairs for issues such as faulty plumbing, lack of water, heat, faulty electrical wiring, leaking roofs, and other emergencies. There has also been a significant rise in requests for accessibility modifications like handrails, ramps, handicapped showers, and grab bars.                                                                                                                                                                    |
| <b>12</b> | <b>Project Name</b>                                                                            | CD2412 Minor Repairs Program                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|           | <b>Target Area</b>                                                                             | Citywide                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|           | <b>Goals Supported</b>                                                                         | Preserve existing affordable units (rehab)                                                                                                                                                                                                                                                                                                                                                                                                                               |
|           | <b>Needs Addressed</b>                                                                         | Affordable Housing                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|           | <b>Funding</b>                                                                                 | CDBG: \$75,000.00                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|           | <b>Description</b>                                                                             | The City of Pueblo established the Minor Repair Program in 2009 to provide repair services to low- to moderate-income, owner-occupied housing. The Program can make singular-type repairs in people's homes for those who cannot afford to make the repairs themselves. The program aims to restore the services to the home, make necessary improvements to the home's habitability, and increase the home's longevity through the restoration of deferred maintenance. |
|           | <b>Target Date</b>                                                                             | 6/30/2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | (12) Owner-occupied households will be assisted by the program through code-compliant housing repairs during the year.                                                                                                                                                                                                                                                                                                                                                   |
|           | <b>Location Description</b>                                                                    | The Program will be operated within the city limits.                                                                                                                                                                                                                                                                                                                                                                                                                     |
|           | <b>Planned Activities</b>                                                                      | Each minor repair project is limited to \$5,000 and can cover the repair of one item in the home or one category within the home. For example, this could involve replacing an exterior door as a single item or replacing the water supply lines throughout the home as an item within the plumbing category.                                                                                                                                                           |
| <b>13</b> | <b>Project Name</b>                                                                            | CD2413 Housing Rehabilitation Program                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|           | <b>Target Area</b>                                                                             | Citywide                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|           | <b>Goals Supported</b>                                                                         | Preserve existing affordable units (rehab)                                                                                                                                                                                                                                                                                                                                                                                                                               |
|           | <b>Needs Addressed</b>                                                                         | Affordable Housing                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|           | <b>Funding</b>                                                                                 | CDBG: \$68,413.00                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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|    | <b>Description</b>                                                                             | The project aims to offer housing rehabilitation services to low-income, owner-occupied, single-family homes. The program has a limit of \$25,000 per home. The funds can be used to repair or replace mechanical, electrical, and plumbing systems within the home. They can also cover other structural repairs or weatherization elements such as roofing, siding, painting, doors, and windows. Cosmetic items are allowed as long as they contribute to the goal of providing decent, safe, and sanitary housing. |
|    | <b>Target Date</b>                                                                             | 2/28/2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|    | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Three families will be assisted. Eligible applicants are homeowners within the city of Pueblo, who have lived in their home for more than two years and are income qualified below 80% Area Median Income.                                                                                                                                                                                                                                                                                                             |
|    | <b>Location Description</b>                                                                    | The Program will be operated with in the city limits.                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|    | <b>Planned Activities</b>                                                                      | CDBG funds will be used for direct construction expenses of the projects and required services, including LBP inspection, LBP risk assessment, clearance testing, asbestos and other environmental consulting, engineering, credit and ownership reports, printing, and publication.                                                                                                                                                                                                                                   |
| 14 | <b>Project Name</b>                                                                            | CD2414 Eastside Childe Care Improvements                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|    | <b>Target Area</b>                                                                             | Citywide                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|    | <b>Goals Supported</b>                                                                         | Improve and maintain public infrastructure and fac                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|    | <b>Needs Addressed</b>                                                                         | Public Infrastructure and Facilities                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|    | <b>Funding</b>                                                                                 | CDBG: <del>\$65,000.00</del> 100,000.00                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|    | <b>Description</b>                                                                             | Construct a two-van garage to protect and store vehicles overnight. The project will also replace the flooring in the toddler room to remediate water damage from a plumbing leak.                                                                                                                                                                                                                                                                                                                                     |
|    | <b>Target Date</b>                                                                             | 6/30/2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|    | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | One public facility will be upgraded. The facility serves young families in a low-mod area allowing the parents to work outside of the home.                                                                                                                                                                                                                                                                                                                                                                           |
|    | <b>Location Description</b>                                                                    | The project is located at 2717 E. 8th Street, Pueblo, CO 81001 (CT10, BLK1).                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|           |                                                                                                |                                                                                                                                                                                                                          |
|-----------|------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           | <b>Planned Activities</b>                                                                      | Construct a two-van garage to protect and store vehicles overnight. The project will also replace the flooring in the toddler room to remediate water damage from a plumbing leak.                                       |
| <b>15</b> | <b>Project Name</b>                                                                            | CD2415 Posada Parking Lot Improvements                                                                                                                                                                                   |
|           | <b>Target Area</b>                                                                             | Citywide                                                                                                                                                                                                                 |
|           | <b>Goals Supported</b>                                                                         | Improve and maintain public infrastructure and fac                                                                                                                                                                       |
|           | <b>Needs Addressed</b>                                                                         | Public Infrastructure and Facilities                                                                                                                                                                                     |
|           | <b>Funding</b>                                                                                 | CDBG: \$40,150.00                                                                                                                                                                                                        |
|           | <b>Description</b>                                                                             | Install an ADA compliant entry ramp with railing and re-surface the existing parking lot to included striping and ADA signage. The project will improve accessibility and designate ADA parking from the other spaces.   |
|           | <b>Target Date</b>                                                                             | 2/28/2025                                                                                                                                                                                                                |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Posada's public services are operated out of their office at 501 Belmont Avenue, the parking lot improvements will allow the non-profit to serve the homeless in the community. The agency serves 1000 clients annually. |
|           | <b>Location Description</b>                                                                    | The project will take place at 501 Belmont Avenue, Pueblo, CO 81004 (CT18, BLK1).                                                                                                                                        |
|           | <b>Planned Activities</b>                                                                      | Install an ADA compliant entry ramp with railing and re-surface the existing parking lot to included striping and ADA signage. The project will improve accessibility and designate ADA parking from the other spaces.   |
| <b>16</b> | <b><u>Project Name</u></b>                                                                     | <b><u>CD2416 Environmental Testing for Future Development</u></b>                                                                                                                                                        |
|           | <b><u>Target Area</u></b>                                                                      | <b><u>Citywide</u></b>                                                                                                                                                                                                   |
|           | <b><u>Goals Supported</u></b>                                                                  | <b><u>Low/Moderate-income Area Benefit</u></b>                                                                                                                                                                           |
|           | <b><u>Needs Addressed</u></b>                                                                  | <b><u>Housing</u></b>                                                                                                                                                                                                    |
|           | <b><u>Funding</u></b>                                                                          | <b><u>CDBG: \$10,649</u></b>                                                                                                                                                                                             |
|           | <b><u>Description</u></b>                                                                      |                                                                                                                                                                                                                          |
|           | <b><u>Target Date</u></b>                                                                      | <b><u>11/20/2026</u></b>                                                                                                                                                                                                 |

|            |                                                                                                       |                                                                                         |
|------------|-------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|
|            | <b><u>Estimate the number and type of families that will benefit from the proposed activities</u></b> | <u>1,000</u>                                                                            |
|            | <b><u>Location Description</u></b>                                                                    |                                                                                         |
|            | <b><u>Planned Activities</u></b>                                                                      | <u>Environmental testing in low/moderate-income areas for future development sites.</u> |
| <b>176</b> | <b>Project Name</b>                                                                                   | HO2410 - City HOME Administration                                                       |
|            | <b>Target Area</b>                                                                                    | Citywide<br>Countywide                                                                  |
|            | <b>Goals Supported</b>                                                                                | Planning and administration of federal programs                                         |
|            | <b>Needs Addressed</b>                                                                                | Administration and Planning                                                             |
|            | <b>Funding</b>                                                                                        | HOME: \$76,589.00                                                                       |
|            | <b>Description</b>                                                                                    | Administration and planning activities for the HOME program.                            |
|            | <b>Target Date</b>                                                                                    | 2/28/2025                                                                               |
|            | <b>Estimate the number and type of families that will benefit from the proposed activities</b>        | N/A - Administration activity                                                           |
|            | <b>Location Description</b>                                                                           | Division of Housing and Citizen Services, 2631 E 4th Street, Pueblo, CO 81001           |
|            | <b>Planned Activities</b>                                                                             | Administration of the HOME program.                                                     |
| <b>187</b> | <b>Project Name</b>                                                                                   | HO2420 Pueblo County HOME Administration                                                |
|            | <b>Target Area</b>                                                                                    | Countywide                                                                              |
|            | <b>Goals Supported</b>                                                                                | Planning and administration of federal programs                                         |
|            | <b>Needs Addressed</b>                                                                                | Administration and Planning                                                             |
|            | <b>Funding</b>                                                                                        | HOME: \$11,445.00                                                                       |
|            | <b>Description</b>                                                                                    | Pueblo County's administration of the HOME Program.                                     |
|            | <b>Target Date</b>                                                                                    | 2/28/2025                                                                               |

|             |                                                                                                |                                                                                                                                                                                          |
|-------------|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|             | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | N/A - Administration activity                                                                                                                                                            |
|             | <b>Location Description</b>                                                                    | Pueblo County Department of Human Services, 405 W. 9th Street, Pueblo, CO 81003                                                                                                          |
|             | <b>Planned Activities</b>                                                                      |                                                                                                                                                                                          |
| <b>189</b>  | <b>Project Name</b>                                                                            | HO2430 - Pueblo County Housing Programs                                                                                                                                                  |
|             | <b>Target Area</b>                                                                             | Countywide                                                                                                                                                                               |
|             | <b>Goals Supported</b>                                                                         | New construction of affordable housing                                                                                                                                                   |
|             | <b>Needs Addressed</b>                                                                         | Affordable Housing                                                                                                                                                                       |
|             | <b>Funding</b>                                                                                 | HOME: <del>\$85,834.00</del> 80,111.76                                                                                                                                                   |
|             | <b>Description</b>                                                                             | This includes a range of activities, including TBRA, new construction, rehabilitation, acquisition/rehab, in-fill development, and other housing activities allowed by HOME regulations. |
|             | <b>Target Date</b>                                                                             | 2/28/2026                                                                                                                                                                                |
|             | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | One rental unit will be constructed with the funding.                                                                                                                                    |
|             | <b>Location Description</b>                                                                    | Pueblo County Department of Human Services, 405 W. 9th Street, Pueblo, CO 81003                                                                                                          |
|             | <b>Planned Activities</b>                                                                      | This includes a range of activities, including TBRA, new construction, rehabilitation, acquisition/rehab, in-fill development, and other housing activities allowed by HOME regulations. |
| <b>2019</b> | <b>Project Name</b>                                                                            | HO2440 Community Development Housing Organization Project                                                                                                                                |
|             | <b>Target Area</b>                                                                             | Citywide                                                                                                                                                                                 |
|             | <b>Goals Supported</b>                                                                         | New construction of affordable housing                                                                                                                                                   |
|             | <b>Needs Addressed</b>                                                                         | Affordable Housing                                                                                                                                                                       |
|             | <b>Funding</b>                                                                                 | HOME: \$132,052.00                                                                                                                                                                       |

|            |                                                                                                |                                                                                                                                                                                                                                                                                                                         |
|------------|------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|            | <b>Description</b>                                                                             | A CHDO project has not yet been identified. The funds will target the production of one of the following activities: - New construction or rehabilitation of housing units, for rental or homebuyer projects.                                                                                                           |
|            | <b>Target Date</b>                                                                             | 12/31/2026                                                                                                                                                                                                                                                                                                              |
|            | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | One unit will be constructed or rehabilitated.                                                                                                                                                                                                                                                                          |
|            | <b>Location Description</b>                                                                    | TBD                                                                                                                                                                                                                                                                                                                     |
|            | <b>Planned Activities</b>                                                                      | A CHDO project has not yet been identified. The funds will target the production of one of the following activities: <ul style="list-style-type: none"> <li>• New construction or rehabilitation of housing units</li> <li>• For rental or homebuyer projects.</li> </ul>                                               |
| <b>210</b> | <b>Project Name</b>                                                                            | HO2450 - City Housing Programs                                                                                                                                                                                                                                                                                          |
|            | <b>Target Area</b>                                                                             | Citywide                                                                                                                                                                                                                                                                                                                |
|            | <b>Goals Supported</b>                                                                         | New construction of affordable housing                                                                                                                                                                                                                                                                                  |
|            | <b>Needs Addressed</b>                                                                         | Affordable Housing                                                                                                                                                                                                                                                                                                      |
|            | <b>Funding</b>                                                                                 | HOME: \$ <del>574,424.00</del> <u>536,129.24</u>                                                                                                                                                                                                                                                                        |
|            | <b>Description</b>                                                                             | This includes a range of activities, including TBRA, new construction, rehabilitation, acquisition/rehab, in-fill development, and other housing activities allowed by HOME regulations.                                                                                                                                |
|            | <b>Target Date</b>                                                                             | 12/31/2026                                                                                                                                                                                                                                                                                                              |
|            | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | (3) families will benefit from this activity: <ul style="list-style-type: none"> <li>• One family whose income is below 50% of the Area Median Income;</li> <li>• One family whose income is above 50% of the Area Median Income;</li> <li>• One family whose income is below 80% of the Area Median Income;</li> </ul> |
|            | <b>Location Description</b>                                                                    | City limits                                                                                                                                                                                                                                                                                                             |

|           |                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-----------|------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|           | <b>Planned Activities</b>                                                                      | <p>The City intends to use its HOME allocation to support the infill construction of two affordable housing units for low—and moderate-income homeowners. Additionally, HOME funds may support the rehabilitation of rental projects, although specific projects have not yet been determined. For rental rehabilitation activities, recapture provisions will be set in place for the amount invested in the property.</p> <p>HOME funds will be utilized for the construction of one infill home. A direct subsidy may be offered to buyers below 80% AMI who qualify for an FHA mortgage or other 30-year fixed-rate mortgage but are unable to secure a mortgage for the appraised value. The amount of the direct subsidy provided will determine the length of the affordability period, with the subsidy amount falling within established limits.</p> |
| <b>21</b> | <b>Project Name</b>                                                                            | <u>HO2470 – CHDO Operating</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|           | <b>Target Area</b>                                                                             | <u>Citywide</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|           | <b>Goals Supported</b>                                                                         | <u>New construction of affordable housing</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|           | <b>Needs Addressed</b>                                                                         | <u>Affordable Housing</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|           | <b>Funding</b>                                                                                 | <u>HOME: \$44,017</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|           | <b>Description</b>                                                                             | <u>Operational funding for Community Housing Development Organizations</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|           | <b>Target Date</b>                                                                             | <u>12/31/2026</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|           | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | <u>It is estimated that 25 families will benefit from the creation of new affordable housing units within the Pueblo City Limits.</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|           | <b>Location Description</b>                                                                    | <u>City limits</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|           | <b>Planned Activities</b>                                                                      | <u>CHDO Operational Funding</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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

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

CDBG funds are eligible within the city limits, and will be targeted to serving a low income population. HOME funds are eligible to be expended within Pueblo county. Rental housing or rental units are the primary focus with these funds. The majority of rental housing is located within the city of Pueblo. There are no identified geographic priorities within the City or County. The funds will be expended as described below.

### **Geographic Distribution**

| <b>Target Area</b> | <b>Percentage of Funds</b> |
|--------------------|----------------------------|
| Citywide           | 94                         |
| Countywide         | 6                          |

**Table 5 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The majority of funds are allocated to the City of Pueblo. The City receives an additional \$1.4 million in CDBG funds compared to the County, making it seem like a higher percentage of funds are being spent. The HOME funds are distributed between consortia partners based on percentages determined by HUD. The City receives 87% of the funds, and the County receives 13%. These percentages are typically updated each June. Within the city, funds are allocated to different neighborhoods to address the needs of residents.

### **Discussion**

Access to transit, services, and broadband is limited outside the city limits. Directing the majority of the funding to promote housing and services within the city limits will benefit more low-income individuals and families and provide greater coordinated access to the funded services and amenities.

## Affordable Housing

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

#### Introduction

The following tables outline the affordable housing goals funded with CDBG and HOME funds using 2024 dollars.

| One Year Goals for the Number of Households to be Supported |    |
|-------------------------------------------------------------|----|
| Homeless                                                    | 3  |
| Non-Homeless                                                | 26 |
| Special-Needs                                               | 2  |
| Total                                                       | 31 |

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

| One Year Goals for the Number of Households Supported Through |    |
|---------------------------------------------------------------|----|
| Rental Assistance                                             | 5  |
| The Production of New Units                                   | 3  |
| Rehab of Existing Units                                       | 23 |
| Acquisition of Existing Units                                 | 0  |
| Total                                                         | 31 |

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

#### Discussion

According to 91.220(1), the HOME program has specific requirements. Eligible applicants for HOME-funded programs include low—and moderate-income households living in the city or County and developers working on projects to build or renovate income-restricted units. HOME requirements also apply to applications for HOME funds for Low-Income Housing Tax Credit (LIHTC) projects or RAD conversions carried out by the Housing Authority.

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

### **Introduction**

The following action plan will address the needs of public housing.

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

This year, the Housing Authority of the City of Pueblo completed the third phase of the Rental Assistance Demonstration program. The phase involved transferring 47 tenants from the Sangre de Cristo Apartments to the new Crawford Townhomes complex. The next and final phase of the program will be the Sitter Townhomes project, which will involve demolishing the remaining units of the Sangre de Cristo Apartments and building up to 40 new units.

Additionally, the City of Pueblo now has nine new homeowners as a result of the Low-Income Housing Tax Credit (LIHTC) project, Oakshire. Nine more units were sold to eligible tenants who had signed an option agreement with HACP, and four or more tenants are awaiting their opportunity to buy their homes. The sale of these homes was part of an agreement between HACP and the Colorado Housing and Finance Authority upon the completion of the project.

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

The Housing Authority of the City of Pittsburgh (HACP) actively encourages public housing residents to participate in programs that promote self-sufficiency and homeownership. One such program is the Home Ownership Program (HOP). It allows families receiving assistance through the Housing Choice Voucher program to use their vouchers towards homeownership while providing monthly assistance for homeownership expenses. Currently, HACP has 28 participants in the HOP program.

Additionally, HACP runs the Family Self-Sufficiency Program (FSS), a voluntary five-year program designed to help participants in both the Housing Choice Voucher and Public Housing programs improve their economic status and reduce reliance on public assistance. Currently, there are 76 participants enrolled in the program, with 298 FSS contracts completed since October 1998. The Family Self-Sufficiency Coordinator is crucial in helping participants create personalized plans for self-reliance, identify necessary steps and activities to achieve their goals, and provide referrals to supportive social services such as childcare, job preparation, credit counseling, education, transportation, and vocational training.

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

**provided or other assistance**

The Housing Authority of the City of Pueblo is not designated as a troubled PHA.

**Discussion**

The City of Pueblo has joined efforts with the Housing Authority to demolish units within a decommissioned public housing site to be converted to a RAD Section 8 project by applying to the EPA for \$3M in funds to begin the housing project.

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

### **Introduction**

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

The City of Pueblo does not directly receive ESG funds. Instead, a portion of its CDBG funds is used for public services to support individuals experiencing homelessness or at risk of becoming homeless. These services include initiatives such as youth outreach, homeless prevention, and covering operating costs for housing providers.

The Pueblo CoC is committed to assisting families and individuals experiencing or at risk of homelessness, aligning its goals with the Colorado Balance of State Continuum of Care goals. These goals include expanding access to quality, integrated healthcare, increasing housing opportunities, advocating for improved public policy and community engagement to end homelessness, developing a highly trained and equipped workforce for the Colorado Coalition for the Homeless (CCH), and enhancing CCH's financial stability.

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

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

The Pueblo Continuum of Care (CoC), part of the Colorado Balance of State, aims to reduce homelessness by helping individuals and families move into permanent housing. To achieve this goal, the CoC regularly meets to identify ongoing needs and discuss issues affecting homeless individuals. Health Solutions is the lead agency that provides outreach to assess the needs of those experiencing homelessness. The CoC is involved in the Built for Zero campaign, which aims to end homelessness by maintaining a By-Name list for each category (e.g., veterans and families).

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Posada and the Pueblo Rescue Mission, along with the Pueblo Health Department, Police, and Fire Departments, provide outreach to local camps and areas of town where individuals are homeless or stranded, such as the railroad tracks, interstate, and Fountain Creek. The team includes medical and mental health professionals, veteran representatives, Medevac personnel, and law enforcement. They document the camps, take pictures, and offer basic medical care and other resources, including shelter, to individuals and families. The goal is to build trust among the homeless population and help them transition off the streets.

#### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to**

**permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

Funding has been and continues to be the main challenge in expanding housing and services for people and families experiencing homelessness and those at risk of becoming homeless. The City of Pueblo plans to use CDBG funds to provide services. However, tenant-based rental assistance through HOME funding is limited due to a lack of available housing and market rents that exceed the HOME rental limit.

The Pueblo CoC aims to assist families and individuals experiencing or at risk of homelessness in line with the BoS goals:

- Expand access to quality, integrated healthcare
- Expand housing opportunities
- Improve public policy and community engagement to end homelessness

Local agencies working to end homelessness collaborate to provide services and housing. However, one of the biggest challenges is finding safe and affordable units for individuals and families. The City will continue participating in the Continuum of Care and support the Pueblo CoC in seeking additional funding.

In 2019, the City established a 92-bed homeless shelter to help meet the emergency shelter needs of people experiencing homelessness. In 2021, the Right Place, a 35-unit permanent supportive housing facility, began operating at full capacity. Planned for 2024 is the redevelopment of a strip mall to provide emergency shelter during inclement weather. The additional facility will provide increased service and allow for isolation should shelter residents be ill.

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

At-risk populations include individuals released from the correctional system, the Colorado Mental Health Institute, and youth transitioning out of foster care. The City's Tenant-Based Rental Assistance Program targets these populations with its funding. All three systems have discharge plans that provide short-term housing funding. However, the issue arises when these individuals have used up the program's resources but have yet to become self-sufficient. In such cases, the CoC steps in to assist

these individuals.

Stakeholders emphasized the need to involve healthcare institutions in adhering to discharge policies and ensuring that people with significant medical needs are not released directly into homelessness. If they are, medical respite beds in emergency shelters are required to meet these individuals' needs.

## **Discussion**

The Pueblo Consortium will coordinate its efforts to administer the HOME-ARP received in 2021, using the strategies outlined in the program requirements and the needs and obstacles outlined above.

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

### **Introduction**

The Draft Analysis of Impediments to Fair Housing Choice has been completed. The AI identifies barriers to fair housing that are also barriers to affordable housing. The City may select additional actions to take than the ones listed below.

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

Below are some identified strategies to overcome barriers to affordable housing:

- Provide financial assistance to renters and owners through Tenant-Based Rental Assistance (TBRA), down payment and closing cost assistance, and security deposit assistance.
- Invest Community Development Block Grant (CDBG) and HOME funds in affordable housing development.
- Revise zoning regulations to improve the ability of developers to build missing middle housing.
- Revise zoning definitions to expand areas allowing manufactured housing.
- Revise zoning definitions to redefine a family unit to permit group homes where allowed by State law.
- Revise the city's limited English proficiency policy to conform to updated guidance.
- Update the City's Anti-displacement and Relocation Plan to ensure that low-income individuals and households at risk are protected.
- Provide fair housing education and outreach to landlords, management companies, renters, lenders, potential homebuyers, real estate agents, and others in the real estate industry, as well as provide legal assistance to move housing through probate.

### **Discussion**

In 2021, the City and County conducted a strategic housing assessment that identified the lack of market-rate housing as a severe impediment to affordable housing. This lack of market housing does not allow the real estate market to operate effectively, leading to sales price escalations and increasing rents. The city's number one goal is to increase the housing supply of all types, increase the vacancy rate, and relieve rents.

In 2022, the City designated NeighborWorks of Southern Colorado as a non-profit instrument of the government. This distinction allows the non-profit to provide additional down payment assistance to homebuyers. The non-profit can now assist homebuyers who cannot raise the minimum down payment equal to 3.5% of the purchase price required by FHA. Previously, the non-profit could only assist homebuyers who contributed 3.5% towards the down payment with personal funds.

In 2022, the City authorized the Multi-Family Zoning Code to provide more design flexibility and reduce development time and cost. Previously, multi-family developments were classified as commercial projects and required to meet the same standards as grocery stores or large box stores. The new code allows for more design options and a more comprehensive range of materials, which makes for a better or more economical product and saves time without requesting unnecessary variances.

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

### **Introduction**

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

### **Actions planned to address obstacles to meeting underserved needs**

The main challenge in meeting the needs of underserved populations is the limited funding available to address their priorities. The gap between what households can afford to pay for housing and the actual cost of housing is increasing, making it challenging to meet the needs of underserved communities. Additionally, the city lacks affordable housing options to cater to the community's needs.

The reduced ability to afford rising housing expenses has led to increased homelessness, higher demand for supportive services, rising housing costs, stagnant wages adjusted for inflation, and an aging housing inventory that needs refurbishment. To address these challenges, the City of Pueblo will collaborate with public agencies and non-profit organizations to maximize resources and outcomes in housing and community development. Utilizing funds such as CDBG and CDBG-CV, the city will work with local service providers to prevent homelessness by providing rent assistance and utility aid to very low-income households. Additionally, housing counseling and case management services will be provided.

The city and the County will continue to allocate general revenue to fund various public services. While the demand for resources is more significant than what is available, local funding supports several agencies working to assist vulnerable residents. It enables these agencies to attract outside financing through local support.

To promote and maintain affordable housing, the city plans to use CDBG funds for housing rehabilitation programs tailored for seniors and individuals requiring accessibility modifications to age in place. Furthermore, HOME funds will be used to construct new homebuyer and rental housing units.

The City of Pueblo Department of Public Health and Environment operates a lead blood testing program for residents. The program includes lead risk and hazard reduction education for property owners, managers, and tenants, environmental testing for lead hazard screening, blood lead screening for children and women, and monitoring programs for children with elevated blood lead levels. The department also provides information on common sources of lead exposure, potential health effects, and methods to reduce exposure.

Efforts to reduce the number of families living in poverty will involve coordinating with existing agencies to evaluate needs, deliver services, and provide funding assistance through the CDBG Program when resources are insufficient. Additionally, the city will work to coordinate community development strategies, facilitate access to financial services, and support agencies' fundraising efforts.

The City of Pueblo is committed to coordinating Anti-Poverty and Community Development initiatives. It has established intergovernmental agreements to administer funds to non-profit agencies and economic development organizations that enhance the quality of life in the community. The city is also working to foster collaboration among various community groups.

### **Actions planned to foster and maintain affordable housing**

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

### **Actions planned to reduce lead-based paint hazards**

The City will promote awareness and undertake LBP Training of contractors within the community to help prevent accidental poisoning due to construction.

### **Actions planned to reduce the number of poverty-level families**

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

- continue to work to coordinate community development strategies, needs assessments and integrated planning.
- continue to work within the Continuum of Care process and other coordinating agencies to reduce duplication, improve integration, and identify unmet service needs.
- expand coordination among local funding entities to streamline the application process, and to maximize the impact of those resources.
- coordinate efforts to develop a financial navigation center to increase banking participation and financial literacy.
- provide letters of support and other documentation to agencies in support of their fundraising

efforts.

- enhance public access to information about community services.

### **Actions planned to develop institutional structure**

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

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

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

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

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

### **Discussion**

Of all the activities listed above, the development of affordable housing is of highest priority. The development of market rate housing along with the creation and preservation of affordable housing will relieve market stress, reduce housing cost, and increase disposable income.

## Program Specific Requirements

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

#### Introduction

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

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

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

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

#### Other CDBG Requirements

- |                                                                                                                                                                                                                                                                                                                                                                                                   |        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| 1. The amount of urgent need activities                                                                                                                                                                                                                                                                                                                                                           | 0      |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 90.00% |

#### HOME Investment Partnership Program (HOME)

##### Reference 24 CFR 91.220(I)(2)

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

The City does not anticipate receiving any additional program income for its HOME programs during

FY2024 or any other forms of investment.

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

The Consortium has elected to enforce recapture provisions to preserve the affordability of units during the HOME period of affordability, where said provisions are stated in this policy and the Consortium's consolidated plan. These provisions are imposed for the duration of the period of affordability on all HOME-assisted homebuyer projects through a written agreement with the homebuyer and enforced via covenants running with the land. The HOME recapture provisions are established at 24 C.F.R. §92.254(a)(5)(ii) and HUD CPD Notice 12-003.

This recapture policy ensures that the Consortium recoups all or a portion of the HOME assistance to the homebuyer, if the housing does not continue to be the principal residence of the family for the duration of the period of affordability. A subsequent homebuyer may assume the HOME assistance (subject to the HOME requirements for the remainder of the period of affordability) if the subsequent homebuyer is low-income, and no additional HOME assistance is provided. The original homebuyer may sell the property to any willing buyer during the period of affordability while the Consortium is able to recapture all or a portion of the HOME-assistance provided to the original homebuyer. The Consortium will recapture the direct HOME subsidy from the original buyer.

The recapture provisions are triggered by any transfer of title, either voluntary or involuntary, during the established HOME period of affordability. For HOME-assisted homebuyer units under the recapture option, the period of affordability is based upon the direct HOME subsidy provided to the homebuyer that enabled the homebuyer to purchase the unit. Any HOME program income used to provide direct assistance to the homebuyer is included when determining the period of affordability. The HOME period of affordability is shown on the chart below:

If the total HOME investment of direct subsidy in the unit is under \$15,000 the period of affordability will be 5 years.

If the total HOME investment of direct subsidy in the unit is between \$15,000 and \$40,000 the period of affordability will be 10 years.

For assistance above \$40,000, the period of affordability will be 15 years.

Direct HOME subsidy is defined as the amount of HOME assistance, including any program income, which enabled the homebuyer to buy the unit. The direct subsidy includes down payment, closing costs, interest subsidies, or other HOME assistance provided directly to the homebuyer. In addition, direct subsidy includes any assistance that reduced the purchase price from fair market value to an affordable price. If HOME funds are used for the cost of developing a property and the unit is sold

below fair market value, the difference between the fair market value and the purchase price is directly attributable to the HOME subsidy.

The Consortium has chosen to recapture a portion of the net proceeds should the property sell during the period of affordability. Net proceeds are defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs. Under no circumstances will the Consortium recapture more than is available from the net proceeds of the sale.

The Consortium will not utilize recapture provisions when a project receives only a development subsidy. Programs will be structured such that a direct subsidy will be required for eligibility. Applicants not requiring a direct subsidy would be served by the market.

The form of recapture to be used by the Consortium: recapture the full amount of the direct subsidy provided to the homebuyer, subject to available net proceeds, during the affordability period.

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

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

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

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

The Consortium does not permit the use of HOME funds to refinance existing debt secured by

multifamily or single-family housing that is being rehabilitated with HOME funds.

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

The City does not refinance existing debt with HOME funds.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

### **Tenant Selection Plan and Outreach Strategy**

Note: The following Tenant Selection Plan and Outreach Strategy is part of the DHCS or its Contractor/Subrecipient HOME Tenant-Based Rental Assistance (TBRA) Program Policies & Procedures.

### **Key TBRA Policies Affecting Marketing and Tenant Selection**

Target Population: HOME TBRA will be targeted to households at risk to include (families with children, foster care youth, the mental and physically disabled and individuals exiting institutions and their household members that also meets the following criteria:

- a) Currently live in a nursing home, hospital, residential care facility, intermediate care facility, group home, boarding home, habilitation center, or other institutional setting for more than 90 days
- b) Wish to live in an apartment or house in the community
- c) Lack the financial resources to make the transition from the congregate living setting to living in the community
- d) Have an income at or below 60% of the Area Median Income at the time the TBRA rental assistance is provided to the participant.
- e) Are eligible to receive assistance from a provider agency such as an Independent Living Center or the other provider network to assist with this transition from living in an institutional setting to

living in an apartment or home in the community

f) Capable of living in an independent setting with support services available to assist with in-home and community-based services as needed

g) Meet the minimum Colorado residency requirement of 6 months.

h) Require access to time-limited rental assistance in order to access a permanent housing option in the community using other rental housing options such as public housing, Section 8 Housing Choice Voucher, Project-Based Section 8, HUD Section 202, HUD Section 811, or other rental or owner occupied housing secured by the individual at their determination.

## 1. Disability Status Determination

All applicants will have to complete the Verification of Disability form to be eligible for the program. A licensed medical doctor or psychiatrist will have to complete and sign all Verifications of Disability for all applicants with severe mental illness, physical disability, or developmental disability.

## 2. Wait List

DHCS or its Contractor/Subrecipient will maintain one Wait List for applicants seeking the HOME TBRA program. All applications will be date and time stamped when they are received by the DHCS or its Contractor/Subrecipient office. Applications will be placed on the Wait List once they are determined to be eligible and all documentation has been received and validated. Applications that are incomplete or found to be ineligible will not be placed on the Wait List. DHCS or its Contractor/Subrecipient will give preference to emergencies that place the applicant or a member of their family in harm due to a medical or a severe health or safety situation. All emergency preferences will be fully documented in writing as to why the applicant is being moved to the top of the Wait List. The DHCS or its Contractor/Subrecipient will review and approve all emergency preferences.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

An individual with a disability will be added to the wait list of available units over an individual

without a disability, providing a housing preference.

**To be eligible for the TBRA Program beneficiaries must from the following populations:**

**Families with Children**

**Individuals transitioning from mental institutions**

**Youth transitioning from foster care**

**Disabled individual and family with disabled individual.**

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

N/A

PY2024 will concentrate on constructing housing units within the Compass Pointe Apartment project utilizing PAB and 4% LIHTC funding along with SF construction. Moving beyond 2024 the City will utilize the TBRA program more extensively due to the difficulty constructing new units in this economy and regulatory constraints.





## Draft 2024 Annual Action Plan

Attachment A

| Community Development Block Grant Program Funds       |                                            |                                 |                        |               |
|-------------------------------------------------------|--------------------------------------------|---------------------------------|------------------------|---------------|
| 2025                                                  | Estimated CDBG Allocation                  |                                 | \$ 1,453,413.00        |               |
| Project No.                                           | Project Name                               | Project Agency                  | Amount                 | Difference    |
| <b>Public Services</b>                                |                                            |                                 |                        |               |
| CD2401                                                | Administration                             | DHCS                            | \$ 290,000.00          |               |
| CD2402                                                | Homeless Prevention                        | Posada                          | \$ 23,745.00           |               |
| CD2403                                                | Homeless Supportive Services               | Posada                          | \$ 75,000.00           |               |
| CD2404                                                | Homeless Youth Services                    | Posada                          | \$ 35,000.00           |               |
| CD2405                                                | It's All About Being A Teen                | Catholic Charities              | \$ 50,005.00           |               |
| CD2406                                                | Senior Transportation                      | SRDA                            | \$ 30,000.00           |               |
| <b>Public Facilities/Neighborhood Improvements</b>    |                                            |                                 |                        |               |
| CD2407                                                | Crystal Place                              | Kimberly Lopez                  | \$ 61,851.00           | (\$45,649.00) |
| CD2408                                                | Gove Neighborhood Improvements             | Paul Renfree                    | \$ 153,600.00          |               |
| CD2409                                                | ADA Curb Ramps - Bonforte BLVD             | Public Works                    | \$ 200,000.00          |               |
| CD2410                                                | ADA Curb Ramps - Citywide                  | Public Works                    | \$ 200,000.00          |               |
| CD2414                                                | Eastside Child Care Improvements           | Eastside Child Care Center      | \$ 100,000.00          | \$35,000.00   |
| CD2415                                                | Parking Lot Improvements - 501 Belmont     | Posada                          | \$ 40,150.00           |               |
| CD2416                                                | Environmental Testing/Future Development   | City of Pueblo                  | \$ 10,649.00           | \$10,649.00   |
| <b>Housing Activities</b>                             |                                            |                                 |                        |               |
| CD2411                                                | ERESP                                      | Pueblo County                   | \$ 40,000.00           |               |
| CD2412                                                | Rehabilitation                             | DHCS                            | \$ 75,000.00           |               |
| CD2413                                                | Rehabilitation                             | DHCS                            | \$ 68,413.00           |               |
|                                                       |                                            |                                 |                        |               |
|                                                       |                                            | <b>CDBG Total</b>               | <b>\$ 1,453,413.00</b> |               |
|                                                       |                                            |                                 |                        |               |
|                                                       |                                            |                                 |                        |               |
|                                                       |                                            |                                 |                        |               |
| <b>HOME Partnership Investement Act Program Funds</b> |                                            |                                 |                        |               |
| 2024                                                  | Estimated HUD HOME Allocation              |                                 | \$ 880,344.00          |               |
| Project No.                                           | Project Name                               | Project Agency                  | Amount                 |               |
| HO2410                                                | City Administration                        | City of Pueblo                  | \$ 76,589.00           |               |
| HO2420                                                | County Administration                      | Pueblo County                   | \$ 11,445.00           |               |
| HO2430                                                | County Programs                            | Pueblo County                   | \$ 80,111.76           | (\$5,722.24)  |
| HO2440                                                | Community Housing Development Organization | TBD                             | \$ 132,052.00          |               |
| HO2450                                                | City Programs                              | City of Pueblo                  | \$ 536,129.24          | (\$38,294.76) |
| HO2460                                                | City Match                                 | City of Pueblo                  | \$ 176,620.00          |               |
| HO2470                                                | CHDO Operating                             | TBD                             | \$ 44,017.00           |               |
|                                                       |                                            | <b>Allocation w/ City Match</b> | <b>\$ 1,056,964.00</b> |               |

PO#: 491004028  
Replacing PO#: 491004001  
Amendment Routing # SRM: 26-HTD-ZL-00062  
Replacing Routing # SRM: 26-HTD-ZL-00043

# STATE OF COLORADO AMENDMENT (1)

## SIGNATURE AND COVER PAGE

**State Agency**  
Department of Transportation  
**Subrecipient**  
Pueblo Area Council of Governments  
**Original Subaward Agreement Number**  
26-HTD-ZL-00043  
**Amendment Subaward Agreement Number**  
26-HTD-ZL-00062

**Agreement Performance Beginning Date**  
October 1, 2025  
**Current Agreement Expiration Date**  
December 31, 2026  
**Current Fund Expenditure End Date**  
December 31, 2026  
**Subaward Agreement Amount**  
Initial Term - Original Agreement  
Federal Funds  
Maximum Amount (82.79%) \$309,283.00  
Local Amount (17.21%) \$64,292.00  
**Total for All Agreement Terms** \$373,575.00

## THE PARTIES HERETO HAVE EXECUTED THIS AMENDMENT

Each person signing this Amendment represents and warrants that he or she is duly authorized to execute this Amendment and to bind the Party authorizing his or her signature.

**Subrecipient Signature**  
Pueblo Area Council of Governments

**STATE OF COLORADO**  
**Jared S. Polis, Governor**  
Department of Transportation  
Shoshana M. Lew, Executive Director

DocuSigned by:  
Eva Cosyleon  
By: 2E1D7F669415456...

Name: Eva Cosyleon

Title: MPO Manager

Date: 10/28/2025

DocuSigned by:  
Darius R. Pakbaz  
By: C00E7F8838FF4BD...

Name: Darius R. Pakbaz

Title: Director, Division of Transportation Development

Date: 10/28/2025

In accordance with §24-30-202 C.R.S., this Amendment is not valid until signed and dated below by the State Controller or an authorized delegate.

**STATE CONTROLLER**  
**Robert Jaros, CPA, MBA, JD**  
DocuSigned by:  
Lori Copeland  
By: BDA801C5CFAC478...  
Department of Transportation

Effective Date: 10/28/2025

**1) PARTIES**

This Amendment (the "Amendment") to the Original Subaward shown on the Signature and Cover Page for this Amendment (the "Subaward") is entered into by and between the Subrecipient, and the State.

**2) TERMINOLOGY**

Except as specifically modified by this Amendment, all terms used in this Amendment that are defined in the Subaward shall be construed and interpreted in accordance with the Subaward.

**3) EFFECTIVE DATE AND ENFORCEABILITY****A. Amendment Effective Date**

This Amendment shall not be valid or enforceable until the Amendment Effective Date shown on the Signature and Cover Page for this Amendment. The State shall not be bound by any provision of this Amendment before that Amendment Effective Date, and shall have no obligation to pay Subrecipient for any Work performed or expense incurred under this Amendment either before or after of the Amendment term shown in **§3.B** of this Amendment.

**B. Amendment Term**

The Parties' respective performances under this Amendment and the changes to the Subaward contained herein shall commence on the Amendment Effective Date shown on the Signature and Cover Page for this Amendment and shall terminate on the termination of the Subaward.

**4) PURPOSE**

The purpose for this Amendment is to do the following as described in Section 5:

Restate the budget breakdown for CPG funding, revise the Agreement Purpose, and update the Principal Representatives section.

**5) MODIFICATIONS**

The Subaward and all prior amendments thereto, if any, are modified as follows:

- A. The Subaward Agreement Amount on the Subaward Agreement's Cover Page is hereby deleted and replaced with the Subaward Agreement Amount shown on the Signature and Cover Page for this Amendment.
- B. The Agreement Purpose is hereby deleted and replaced with the following:  
In accordance with 23 USC §104(f) and 49 USC §5303, the purpose of this agreement is for CDOT to disburse metropolitan transportation planning funds to Metropolitan Planning Organizations ("MPO") for use within their respective metropolitan planning areas based on a "Continuing, Cooperative and Comprehensive Transportation Planning" process in the State of Colorado as defined by the US Census Bureau for Consolidated Planning Grant ("CPG") purposes.
- C. The Principal Representatives Section is hereby deleted and replaced with the following:

**Principal Representatives**

For the State:  
Marissa Gaughan  
Division of Transportation Development  
Colorado Dept. of Transportation  
2829 W. Howard Place  
Denver, CO 80204  
marissa.gaughan@state.co.us

For Subrecipient:  
Eva Cosyleon  
Pueblo Area Council of Governments  
229 W. 12<sup>th</sup> Street  
Pueblo, CO 81003  
ecosyleon@pueblo.us

**6) LIMITS OF EFFECT**

This Amendment is incorporated by reference into the Subaward, and the Subaward and all prior amendments or other modifications to the Subaward, if any, remain in full force and effect except as specifically modified in this Amendment. Except for the Special Provisions contained in the Subaward, in the event of any conflict, inconsistency, variance, or contradiction between the provisions of this Amendment and any of the provisions of the Subaward or any prior modification to the Subaward, the provisions of this Amendment shall in all respects supersede, govern, and control. The provisions of this Amendment shall only supersede, govern, and control over the Special Provisions contained in the Subaward to the extent that this Amendment specifically modifies those Special Provisions.

**THE REMAINDER OF THIS PAGE IS INTENTIONALLY LEFT BLANK**

**STATE OF COLORADO SUBAWARD AGREEMENT****COVER PAGE****State Agency**

Department of Transportation

**Subrecipient**

Pueblo Area Council of Governments

**Subaward Agreement Amount**

Federal Funds

Maximum Amount (100%) \$373,575.00

Agreement Total

\$373,575.00

**Agreement Number / PO Number**

26-HTD-ZL-00043 / 491004001

**Agreement Performance Beginning Date**

The later of the Effective Date or October 1, 2025

**Initial Agreement Expiration Date**

December 31, 2026

**Fund Expenditure End Date**

December 31, 2026

**Agreement Authority**

Authority to enter into this Agreement exists in CRS §§43-1-106, 43-1-110, 43-1-117.5, 43-1-701, 43-1-702 and 43-2-101(4)(c), appropriated and otherwise made available pursuant to the FAST ACT, MAP-21, SAFETEA\_LU, 23 USC §104 and 23 USC §149.

**Agreement Purpose**

Having been awarded this Project under the current Transportation Improvement Program (TIP), Grantee, desires to enter into a grant with CDOT to develop, implement, and monitor its Safe Routes to School Project, financed by the use of Safe Routes to Schools funds in accordance with FHWA and State policies. CDOT desires to enter into this Grant for such Services from Grantee by obtaining federal financial assistance for the Safe Routes to School program through FHWA, provided that the project is performed in accordance with the terms and conditions contained in this Grant and in accordance with applicable federal laws and regulations.

**Exhibits and Order of Precedence**

The following Exhibits and attachments are included with this Agreement:

1. Exhibit A - Statement of Work and Budget.
2. Exhibit B - Sample Option Letter.
3. Exhibit C - Federal Provisions.
4. Exhibit D - Required Federal Contract/Agreement Clauses.
5. Exhibit E - Verification of Payment.

In the event of a conflict or inconsistency between this Agreement and any Exhibit or attachment, such conflict or inconsistency shall be resolved by reference to the documents in the following order of priority:

1. Exhibit C - Federal Provisions.
2. Exhibit D - Required Federal Contract/Agreement Clauses.
3. Colorado Special Provisions in §17 of the main body of this Agreement.
4. The provisions of the other sections of the main body of this Agreement.
5. Exhibit A - Statement of Work and Budget.
6. Executed Option Letters (if any).

**Principal Representatives**

For the State:

Melissa Gaughan

Division of Transit and Rail

Colorado Dept. of Transportation

2829 W. Howard Place

Denver, CO 80204

marissa.gaughan@state.co.us

For Subrecipient:

Eva Cosyleon

Pueblo Area Council of Governments

229 W. 12<sup>th</sup> Street

Pueblo, CO 81003

ecosyleon@pueblo.us

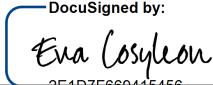
## SIGNATURE PAGE

### THE PARTIES HERETO HAVE EXECUTED THIS AGREEMENT

Each person signing this Agreement represents and warrants that the signer is duly authorized to execute this Agreement and to bind the Party authorizing such signature.

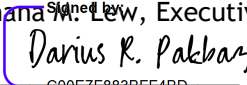
#### SUBRECIPIENT

Pueblo Area Council of Governments

DocuSigned by:  
  
By: \_\_\_\_\_  
Name: Eva Cosyleon  
Title: MPO Manager  
Date: 9/30/2025

#### STATE OF COLORADO

Jared S. Polis, Governor  
Department of Transportation  
Shoshana M. Lew, Executive Director

DocuSigned by:  
  
By: \_\_\_\_\_  
Name: Darius R. Pakbaz  
Title: Director, Division of Transportation Dev  
Date: 9/30/2025

2nd State or Subrecipient Signature if needed

By: \_\_\_\_\_  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_

#### LEGAL REVIEW

Philip J. Weiser, Attorney General

N/A  
By: Assistant Attorney General  
Date: \_\_\_\_\_

In accordance with §24-30-202, C.R.S., this Agreement is not valid until signed and dated below by the State Controller or an authorized delegate.

#### STATE CONTROLLER

Robert Jaros, CPA, MBA, JD

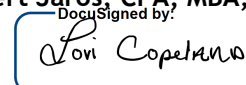
DocuSigned by:  
  
By: Department of Transportation  
Effective Date: 9/30/2025

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1. PARTIES

This Agreement is entered into by and between Subrecipient named on the Cover Page for this Agreement (the “Subrecipient”), and the STATE OF COLORADO acting by and through the State agency named on the Cover Page for this Agreement (the “State”). Subrecipient and the State agree to the terms and conditions in this Agreement.

2. TERM AND EFFECTIVE DATE

A. Effective Date

This Agreement shall not be valid or enforceable until the Effective Date, and the Grant Funds shall be expended by the Fund Expenditure End Date shown on the Cover Page for this Agreement. The State shall not be bound by any provision of this Agreement before the Effective Date, and shall have no obligation to pay Subrecipient for any Work performed or expense incurred before the Effective Date, except as described in **\$5.D**, or after the Fund Expenditure End Date.

B. Initial Term

The Parties’ respective performances under this Agreement shall commence on the Agreement Performance Beginning Date shown on the Cover Page for this Agreement and shall terminate on the Initial Agreement Expiration Date shown on the Cover Page for this Agreement (the “Initial Term”) unless sooner terminated or further extended in accordance with the terms of this Agreement.

C. Extension Terms - State’s Option

The State, at its discretion, shall have the option to extend the performance under this Agreement beyond the Initial Term for a period, or for successive periods, of one year or less at the same rates and under the same terms specified in this Agreement (each such period an “Extension Term”). In order to exercise this option, the State shall provide written notice to Subrecipient in a form substantially equivalent to the Sample Option Letter attached to this Agreement.

D. End of Term Extension

If this Agreement approaches the end of its Initial Term, or any Extension Term then in place, the State, at its discretion, upon written notice to Subrecipient in a form substantially equivalent to the Sample Option Letter attached to this Agreement, may unilaterally extend such Initial Term or Extension Term for a period not to exceed two months (an “End of Term Extension”), regardless of whether additional Extension Terms are available or not. The provisions of this Agreement in effect when such notice is given shall remain in effect during the End of Term

Extension. The End of Term Extension shall automatically terminate upon execution of a replacement Agreement or modification extending the total term of this Agreement.

#### E. Early Termination in the Public Interest

The State is entering into this Agreement to serve the public interest of the State of Colorado as determined by its Governor, General Assembly, or Courts. If this Agreement ceases to further the public interest of the State, the State, in its discretion, may terminate this Agreement in whole or in part. A determination that this Agreement should be terminated in the public interest shall not be equivalent to a State right to terminate for convenience. This subsection shall not apply to a termination of this Agreement by the State for Breach of Agreement by Subrecipient, which shall be governed by **§12.A.i.**

##### i. Method and Content

The State shall notify Subrecipient of such termination in accordance with **§14**. The notice shall specify the effective date of the termination and whether it affects all or a portion of this Agreement, and shall include, to the extent practicable, the public interest justification for the termination.

##### ii. Obligations and Rights

Upon receipt of a termination notice for termination in the public interest, Subrecipient shall be subject to the rights and obligations set forth in **§12.A.i.a.**

##### iii. Payments

If the State terminates this Agreement in the public interest, the State shall pay Subrecipient an amount equal to the percentage of the total reimbursement payable under this Agreement that corresponds to the percentage of Work satisfactorily completed and accepted, as determined by the State, less payments previously made. Additionally, if this Agreement is less than 60% completed, as determined by the State, the State may reimburse Subrecipient for a portion of actual out-of-pocket expenses, not otherwise reimbursed under this Agreement, incurred by Subrecipient which are directly attributable to the uncompleted portion of Subrecipient's obligations, provided that the sum of any and all reimbursement shall not exceed the Subaward Maximum Amount payable to Subrecipient hereunder.

#### F. Subrecipient's Termination Under Federal Requirements

Subrecipient may request termination of this Agreement by sending notice to the State, or to the Federal Awarding Agency with a copy to the State, which includes the reasons for the termination and the effective date of the termination. If this Agreement is terminated in this manner, then Subrecipient shall return any advanced payments made for work that will not be performed prior to the effective date of the termination.

### 3. DEFINITIONS

The following terms shall be construed and interpreted as follows:

- A. **"Agreement"** means this subaward agreement, including all attached Exhibits, all documents incorporated by reference, all referenced statutes, rules and cited authorities, and any future modifications thereto.
- B. **"Award"** means an award by a Recipient to a Subrecipient funded in whole or in part by a Federal Award. The terms and conditions of the Federal Award flow down to the Award unless the terms and conditions of the Federal Award specifically indicate otherwise.
- C. **"Breach of Agreement"** means the failure of a Party to perform any of its obligations in accordance with this Agreement, in whole or in part or in a timely or satisfactory manner. The institution of proceedings under any bankruptcy, insolvency, reorganization or similar law, by or against Subrecipient, or the appointment of a receiver or similar officer for Subrecipient or any of its property, which is not vacated or fully stayed within 30 days after the institution of such proceeding, shall also constitute a breach. If Subrecipient is debarred or suspended under §24-109-105, C.R.S., at any time during the term of this Agreement, then such debarment or suspension shall constitute a breach.
- D. **"Budget"** means the budget for the Work described in Exhibit A.

- E. **“Business Day”** means any day other than Saturday, Sunday, or a legal holiday as listed in §24-11-101(1), C.R.S.
- F. **“CORA”** means the Colorado Open Records Act, §§24-72-200.1, *et. seq.*, C.R.S.
- G. **“Deliverable”** means the outcome to be achieved or output to be provided, in the form of a tangible or intangible Good or Service that is produced as a result of Subrecipient’s Work that is intended to be delivered by Subrecipient.
- H. **“Effective Date”** means the date on which this Agreement is approved and signed by the Colorado State Controller or designee, as shown on the Signature Page for this Agreement.
- I. **“End of Term Extension”** means the time period defined in §2.D.
- J. **“Exhibits”** means the exhibits and attachments included with this Agreement as shown on the Cover Page for this Agreement.
- K. **“Extension Term”** means the time period defined in §2.C.
- L. **“Federal Award”** means an award of Federal financial assistance or a cost-reimbursement contract, under the Federal Acquisition Regulations or by a formula or block grant, by a Federal Awarding Agency to the Recipient. “Federal Award” also means an agreement setting forth the terms and conditions of the Federal Award. The term does not include payments to a Subrecipient or payments to an individual that is a beneficiary of a Federal program.
- M. **“Federal Awarding Agency”** means a Federal agency providing a Federal Award to a Recipient. Federal Transit Administration (FTA) is the Federal Awarding Agency for the Federal Award which is the subject of this Agreement.
- N. **“FTA”** means Federal Transit Administration.
- O. **“Goods”** means any movable material acquired, produced, or delivered by Subrecipient as set forth in this Agreement and shall include any movable material acquired, produced, or delivered by Subrecipient in connection with the Services.
- P. **“Grant Funds”** means the funds that have been appropriated, designated, encumbered, or otherwise made available for payment by the State under this Agreement.
- Q. **“Incident”** means any accidental or deliberate event that results in or constitutes an imminent threat of the unauthorized access, loss, disclosure, modification, disruption, or destruction of any communications or information resources of the State, which are included as part of the Work, as described in §§24-37.5-401, *et. seq.*, C.R.S. Incidents include, without limitation (i) successful attempts to gain unauthorized access to a State system or State Records regardless of where such information is located; (ii) unwanted disruption or denial of service; (iii) the unauthorized use of a State system for the processing or storage of data; or (iv) changes to State system hardware, firmware, or software characteristics without the State’s knowledge, instruction, or consent.
- R. **“Initial Term”** means the time period defined in §2.B.
- S. **“Master Agreement”** means the FTA Master Agreement document incorporated by reference and made part of FTA’s standard terms and conditions governing the administration of a project supported with federal assistance awarded by FTA.
- T. **“Matching Funds”** (Local Funds, or Local Match) means the funds provided by Subrecipient as a match required to receive the Grant Funds and includes in-kind contribution.
- U. **“Party”** means the State or Subrecipient, and “Parties” means both the State and Subrecipient.
- V. **“PII”** means personally identifiable information including, without limitation, any information maintained by the State about an individual that can be used to distinguish or trace an individual’s identity, such as name, social security number, date and place of birth, mother’s maiden name, or biometric records. PII includes, but is not limited to, all information defined as personally identifiable information in §§24-72-501 and 24-73-101, C.R.S.
- W. **“Recipient”** means the State agency shown on the Signature and Cover Pages of this Agreement, for the purposes of this Federal Award.
- X. **“Services”** means the services to be performed by Subrecipient as set forth in this Agreement and shall include any services to be rendered by Subrecipient in connection with the Goods.

- Y. **“State Confidential Information”** means any and all State Records not subject to disclosure under CORA. State Confidential Information shall include but is not limited to PII and State personnel records not subject to disclosure under CORA. State Confidential Information shall not include information or data concerning individuals that is not deemed confidential but nevertheless belongs to the State, which has been communicated, furnished, or disclosed by the State to Subrecipient which (i) is subject to disclosure pursuant to CORA; (ii) is already known to Subrecipient without restrictions at the time of its disclosure to Subrecipient; (iii) is or subsequently becomes publicly available without breach of any obligation owed by Subrecipient to the State; (iv) is disclosed to Subrecipient, without confidentiality obligations, by a third party who has the right to disclose such information; or (v) was independently developed without reliance on any State Confidential Information.
- Z. **“State Fiscal Rules”** means the fiscal rules promulgated by the Colorado State Controller pursuant to §24-30-202(13)(a), C.R.S.
- AA. **“State Fiscal Year”** means a 12-month period beginning on July 1 of each calendar year and ending on June 30 of the following calendar year. If a single calendar year follows the term, then it means the State Fiscal Year ending in that calendar year.
- BB. **“State Records”** means any and all State data, information, and records regardless of physical form.
- CC. **“Subaward Maximum Amount”** means an amount equal to the total of Grant Funds for this Agreement.
- DD. **“Subcontractor”** means any third party engaged by Subrecipient to aid in performance of the Work. “Subcontractor” also includes sub-recipients of Grant Funds.
- EE. **“Subrecipient”** means a non-Federal entity that receives a sub-award from a Recipient to carry out part of a Federal program but does not include an individual that is a beneficiary of such program. A Subrecipient may also be a recipient of other Federal Awards directly from a Federal Awarding Agency. For the purposes of this Agreement, Contractor is a Subrecipient.
- FF. **“Uniform Guidance”** means the Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 CFR Part 200, commonly known as the “Super Circular, which supersedes requirements from OMB Circulars A-21, A-87, A-110, A-122, A-89, A-102, and A-133, and the guidance in Circular A-50 on Single Audit Act follow-up.
- GG. **“Work”** means the Goods delivered and Services performed pursuant to this Agreement.
- HH. **“Work Product”** means the tangible and intangible results of the Work, whether finished or unfinished, including drafts. Work Product includes, but is not limited to, documents, text, software (including source code), research, reports, proposals, specifications, plans, notes, studies, data, images, photographs, negatives, pictures, drawings, designs, models, surveys, maps, materials, ideas, concepts, know-how, information, and any other results of the Work. “Work Product” does not include any material that was developed prior to the Effective Date that is used, without modification, in the performance of the Work.

Any other term used in this Agreement that is defined elsewhere in this Agreement or in an Exhibit shall be construed and interpreted as defined in that section.

#### 4. STATEMENT OF WORK AND BUDGET

Subrecipient shall complete the Work as described in this Agreement and in accordance with the provisions of Exhibit A. The State shall have no liability to compensate Subrecipient for the delivery of any goods or the performance of any services that are not specifically set forth in this Agreement.

#### 5. PAYMENTS TO SUBRECIPIENT

##### A. Subaward Maximum Amount

Payments to Subrecipient are limited to the unpaid, obligated balance of the Grant Funds. The State shall not pay Subrecipient any amount under this Agreement that exceeds the Subaward Maximum Amount shown on the Cover Page of this Agreement as “Federal Funds Maximum Amount”.

## B. Payment Procedures

### i. Invoices and Payment

- a. The State shall pay Subrecipient in the amounts and in accordance with the schedule and other conditions set forth in Exhibit A.
- b. Subrecipient shall initiate payment requests by invoice to the State, in a form and manner approved by the State.
- c. The State shall pay each invoice within 45 days following the State's receipt of that invoice, so long as the amount invoiced correctly represents Work completed by Subrecipient and previously accepted by the State during the term that the invoice covers. If the State determines that the amount of any invoice is not correct, then Subrecipient shall make all changes necessary to correct that invoice.
- d. The acceptance of an invoice shall not constitute acceptance of any Work performed or Deliverables provided under this Agreement.

### ii. Interest

Amounts not paid by the State within 45 days of the State's acceptance of the invoice shall bear interest on the unpaid balance beginning on the 45th day at the rate of 1% per month, as required by §24-30-202(24)(a), C.R.S., until paid in full; provided, however, that interest shall not accrue on unpaid amounts that the State disputes in writing. Subrecipient shall invoice the State separately for accrued interest on delinquent amounts, and the invoice shall reference the delinquent payment, the number of days' interest to be paid and the interest rate.

### iii. Payment Disputes

If Subrecipient disputes any calculation, determination or amount of any payment, Subrecipient shall notify the State in writing of its dispute within 30 days following the earlier to occur of Subrecipient's receipt of the payment or notification of the determination or calculation of the payment by the State. The State will review the information presented by Subrecipient and may make changes to its determination based on this review. The calculation, determination or payment amount that results from the State's review shall not be subject to additional dispute under this subsection. No payment subject to a dispute under this subsection shall be due until after the State has concluded its review, and the State shall not pay any interest on any amount during the period it is subject to dispute under this subsection.

### iv. Available Funds-Contingency-Termination

The State is prohibited by law from making commitments beyond the term of the current State Fiscal Year. Payment to Subrecipient beyond the current State Fiscal Year is contingent on the appropriation and continuing availability of Grant Funds in any subsequent year (as provided in the Colorado Special Provisions). If federal funds or funds from any other non-State funds constitute all or some of the Grant Funds, the State's obligation to pay Subrecipient shall be contingent upon such non-State funding continuing to be made available for payment. Payments to be made pursuant to this Agreement shall be made only from Grant Funds, and the State's liability for such payments shall be limited to the amount remaining of such Grant Funds. If State, federal or other funds are not appropriated, or otherwise become unavailable to fund this Agreement, the State may, upon written notice, terminate this Agreement, in whole or in part, without incurring further liability. The State shall, however, remain obligated to pay for Services and Goods that are delivered and accepted prior to the effective date of notice of termination, and this termination shall otherwise be treated as if this Agreement were terminated in the public interest as described in §2.E.

### v. Federal Recovery

The close-out of a Federal Award does not affect the right of the Federal Awarding Agency or the State to disallow costs and recover funds on the basis of a later audit or other review. Any cost disallowance recovery is to be made within the Record Retention Period, as defined below.

### C. Matching Funds

Subrecipient shall provide Matching Funds as provided in Exhibit A. Subrecipient shall have raised the full amount of Matching Funds prior to the Effective Date and shall report to the State regarding the status of such funds upon request. Subrecipient's obligation to pay all or any part of any Matching Funds, whether direct or contingent, only extends to funds duly and lawfully appropriated for the purposes of this Agreement by the authorized representatives of Subrecipient and paid into Subrecipient's treasury or bank account. Subrecipient represents to the State that the amount designated "Subrecipient's Matching Funds" in Exhibit A has been legally appropriated for the purposes of this Agreement by its authorized representatives and paid into its treasury or bank account. Subrecipient does not by this Agreement irrevocably pledge present cash reserves for payments in future fiscal years, and this Agreement is not intended to create a multiple-fiscal year debt of Subrecipient. Subrecipient shall not pay or be liable for any claimed interest, late charges, fees, taxes or penalties of any nature, except as required by Subrecipient's laws or policies.

### D. Reimbursement of Subrecipient Costs

- i. The State shall reimburse Subrecipient for the federal share of properly documented allowable costs related to the Work after review and approval thereof, subject to the provisions of §5, this Agreement, and Exhibit A. However, any costs incurred by Subrecipient prior to the Effective Date shall not be reimbursed absent specific allowance of pre-award costs and indication that the Federal Award funding is retroactive. The State shall pay Subrecipient for costs or expenses incurred or performance by the Subrecipient prior to the Effective Date, only if (1) the Grant Funds involve federal funding and (2) federal laws, rules, and regulations applicable to the Work provide for such retroactive payments to the Subrecipient. Any such retroactive payments shall comply with State Fiscal Rules and be made in accordance with the provisions of this Agreement.
- ii. The State shall reimburse Subrecipient's allowable costs, not exceeding the Subaward Maximum Amount shown on the Cover Page of this Agreement and on Exhibit A for all allowable costs described in this Agreement and shown in Exhibit A, except that Subrecipient may adjust the amounts between each line item of Exhibit A without formal modification to this Agreement as long as the Subrecipient provides notice to the State of the change, the change does not modify the Subaward Maximum Amount or the Subaward Maximum Amount for any federal fiscal year or State Fiscal Year, and the change does not modify any requirements of the Work.
- iii. The State shall only reimburse allowable costs described in this Agreement and shown in the Budget if those costs are:
  - a. Reasonable and necessary to accomplish the Work and for the Goods and Services provided; and
  - b. Equal to the actual net cost to Subrecipient (i.e. the price paid minus any items of value received by Subrecipient that reduce the cost actually incurred).
- iv. Subrecipient's costs for Work performed after the Fund Expenditure End Date shown on the Cover Page for this Agreement, or after any phase performance period end date for a respective phase of the Work, shall not be reimbursable. Subrecipient shall initiate any payment request by submitting invoices to the State in the form and manner set forth and approved by the State.

### E. Close-Out

Subrecipient shall close out this Award within 45 days after the Fund Expenditure End Date shown on the Cover Page for this Agreement. To complete close-out, Subrecipient shall submit to the State all Deliverables (including documentation) as defined in this Agreement and Subrecipient's final reimbursement request or invoice. The State will withhold 5% of allowable costs until all final documentation has been submitted and accepted by the State as substantially complete. If the Federal Awarding Agency has not closed this Federal Award within one year and 90 days after the Fund Expenditure End Date shown on the Cover Page for this Agreement due to Subrecipient's failure to submit required documentation, then Subrecipient may be prohibited from applying for new Federal Awards through the State until such documentation is submitted and accepted.

## **6. REPORTING - NOTIFICATION**

### **A. Quarterly Reports**

In addition to any reports required pursuant to any other Exhibit, for any Agreement having a term longer than three months, Subrecipient shall submit, on a quarterly basis, a written report specifying progress made for each specified performance measure and standard in this Agreement. Such progress report shall be in accordance with the procedures developed and prescribed by the State. Progress reports shall be submitted to the State not later than five Business Days following the end of each calendar quarter or at such time as otherwise specified by the State.

### **B. Litigation Reporting**

If Subrecipient is served with a pleading or other document in connection with an action before a court or other administrative decision making body, and such pleading or document relates to this Agreement or may affect Subrecipient's ability to perform its obligations under this Agreement, Subrecipient shall, within 10 days after being served, notify the State of such action and deliver copies of such pleading or document to the State's Principal Representative identified on the Cover Page for this Agreement.

### **C. Performance and Final Status**

Subrecipient shall submit all financial, performance and other reports to the State no later than 45 calendar days after the end of the Initial Term if no Extension Terms are exercised, or the final Extension Term exercised by the State, containing an evaluation and review of Subrecipient's performance and the final status of Subrecipient's obligations hereunder.

### **D. Violations Reporting**

Subrecipient shall disclose, in a timely manner, in writing to the State and the Federal Awarding Agency, all violations of federal or State criminal law involving fraud, bribery, or gratuity violations potentially affecting the Federal Award. The State or the Federal Awarding Agency may impose any penalties for noncompliance allowed under 2 CFR Part 180 and 31 U.S.C. 3321, which may include, without limitation, suspension or debarment.

## **7. SUBRECIPIENT RECORDS**

### **A. Maintenance**

Subrecipient shall make, keep, maintain, and allow inspection and monitoring by the State of a complete file of all records, documents, communications, notes and other written materials, electronic media files, and communications, pertaining in any manner to the Work and the delivery of Services (including, but not limited to the operation of programs) or Goods hereunder (collectively, the "Subrecipient Records"). Subrecipient shall maintain such records for a period of three years following the date of submission to the State of the final expenditure report, or if this Award is renewed quarterly or annually, from the date of the submission of each quarterly or annual report, respectively (the "Record Retention Period"). If any litigation, claim, or audit related to this Award starts before expiration of the Record Retention Period, the Record Retention Period shall extend until all litigation, claims, or audit findings have been resolved and final action taken by the State or Federal Awarding Agency. The Federal Awarding Agency, a cognizant agency for audit, oversight or indirect costs, and the State, may notify Subrecipient in writing that the Record Retention Period shall be extended. For records for real property and equipment, the Record Retention Period shall extend three years following final disposition of such property.

### **B. Inspection**

Subrecipient shall permit the State, the federal government, and any other duly authorized agent of a governmental agency to audit, inspect, examine, excerpt, copy and transcribe Subrecipient Records during the Record Retention Period. Subrecipient shall make Subrecipient Records available during normal business hours at Subrecipient's office or place of business, or at other mutually agreed upon times or locations, upon no fewer than two Business Days' notice from the State, unless the State determines that a shorter period of notice, or no notice, is necessary to protect the interests of the State.

**C. Monitoring**

The State, the federal government, and any other duly authorized agent of a governmental agency, in its discretion, may monitor Subrecipient's performance of its obligations under this Agreement using procedures as determined by the State or that governmental entity. Subrecipient shall allow the State to perform all monitoring required by the Uniform Guidance, based on the State's risk analysis of Subrecipient and this Agreement. The State shall have the right, in its sole discretion, to change its monitoring procedures and requirements at any time during the term of this Agreement. The State shall monitor Subrecipient's performance in a manner that does not unduly interfere with Subrecipient's performance of the Work.

**D. Final Audit Report**

Subrecipient shall promptly submit to the State a copy of any final audit report of an audit performed on Subrecipient's records that relates to or affects this Agreement or the Work, whether the audit is conducted by Subrecipient or a third party. Additionally, if Subrecipient is required to perform a single audit under 2 CFR 200.501, *et. seq.*, then Subrecipient shall submit a copy of the results of that audit to the State within the same timelines as the submission to the federal government.

**8. CONFIDENTIAL INFORMATION - STATE RECORDS****A. Confidentiality**

Subrecipient shall keep confidential, and cause all Subcontractors to keep confidential, all State Records, unless those State Records are publicly available. Subrecipient shall not, without prior written approval of the State, use, publish, copy, disclose to any third party, or permit the use by any third party of any State Records, except as otherwise stated in this Agreement, permitted by law or approved in writing by the State. Subrecipient shall provide for the security of all State Confidential Information in accordance with all applicable laws, rules, policies, publications, and guidelines. Subrecipient shall immediately forward any request or demand for State Records to the State's Principal Representative identified on the Cover Page of the Agreement.

**B. Other Entity Access and Nondisclosure Agreements**

Subrecipient may provide State Records to its agents, employees, assigns and Subcontractors as necessary to perform the Work, but shall restrict access to State Confidential Information to those agents, employees, assigns and Subcontractors who require access to perform their obligations under this Agreement. Subrecipient shall ensure all such agents, employees, assigns, and Subcontractors sign agreements containing nondisclosure provisions at least as protective as those in this Agreement, and that the nondisclosure provisions are in force at all times the agent, employee, assign or Subcontractor has access to any State Confidential Information. Subrecipient shall provide copies of those signed nondisclosure provisions to the State upon execution of the nondisclosure provisions if requested by the State.

**C. Use, Security, and Retention**

Subrecipient shall use, hold and maintain State Confidential Information in compliance with any and all applicable laws and regulations only in facilities located within the United States, and shall maintain a secure environment that ensures confidentiality of all State Confidential Information. Subrecipient shall provide the State with access, subject to Subrecipient's reasonable security requirements, for purposes of inspecting and monitoring access and use of State Confidential Information and evaluating security control effectiveness. Upon the expiration or termination of this Agreement, Subrecipient shall return State Records provided to Subrecipient or destroy such State Records and certify to the State that it has done so, as directed by the State. If Subrecipient is prevented by law or regulation from returning or destroying State Confidential Information, Subrecipient warrants it will guarantee the confidentiality of, and cease to use, such State Confidential Information.

**D. Incident Notice and Remediation**

If Subrecipient becomes aware of any Incident, Subrecipient shall notify the State immediately and cooperate with the State regarding recovery, remediation, and the necessity to involve law enforcement, as determined by the State. Unless Subrecipient can establish that Subrecipient

and its agents, employees, and Subcontractors are not the cause or source of the Incident, Subrecipient shall be responsible for the cost of notifying each person who may have been impacted by the Incident. After an Incident, Subrecipient shall take steps to reduce the risk of incurring a similar type of Incident in the future as directed by the State, which may include, but is not limited to, developing and implementing a remediation plan that is approved by the State at no additional cost to the State. The State may adjust or direct modifications to this plan, in its sole discretion and Subrecipient shall make all modifications as directed by the State. If Subrecipient cannot produce its analysis and plan within the allotted time, the State, in its sole discretion, may perform such analysis and produce a remediation plan, and Subrecipient shall reimburse the State for the reasonable costs thereof. The State may, in its sole discretion and at Subrecipient's sole expense, require Subrecipient to engage the services of an independent, qualified, State-approved third party to conduct a security audit. Subrecipient shall provide the State with the results of such audit and evidence of Subrecipient's planned remediation in response to any negative findings.

**E. Data Protection and Handling**

Subrecipient shall ensure that all State Records and Work Product in the possession of Subrecipient or any Subcontractors are protected and handled in accordance with the requirements of this Agreement, including the requirements of any Exhibits hereto, at all times. As used in this section, the protections afforded Work Product only apply to Work Product that requires confidential treatment.

**F. Safeguarding PII**

If Subrecipient or any of its Subcontractors will or may receive PII under this Agreement, Subrecipient shall provide for the security of such PII, in a manner and form acceptable to the State, including, without limitation, State non-disclosure requirements, use of appropriate technology, security practices, computer access security, data access security, data storage encryption, data transmission encryption, security inspections, and audits. Subrecipient shall be a "Third-Party Service Provider" as defined in §24-73-103(1)(i), C.R.S., and shall maintain security procedures and practices consistent with §§24-73-101 *et seq.*, C.R.S.

**9. CONFLICTS OF INTEREST**

**A. Actual Conflicts of Interest**

Subrecipient shall not engage in any business or activities or maintain any relationships that conflict in any way with the full performance of the obligations of Subrecipient under this Agreement. Such a conflict of interest would arise when a Subrecipient or Subcontractor's employee, officer or agent were to offer or provide any tangible personal benefit to an employee of the State, or any member of his or her immediate family or his or her partner, related to the award of, entry into or management or oversight of this Agreement.

**B. Apparent Conflicts of Interest**

Subrecipient acknowledges that, with respect to this Agreement, even the appearance of a conflict of interest shall be harmful to the State's interests. Absent the State's prior written approval, Subrecipient shall refrain from any practices, activities or relationships that reasonably appear to be in conflict with the full performance of Subrecipient's obligations under this Agreement.

**C. Disclosure to the State**

If a conflict or the appearance of a conflict arises, or if Subrecipient is uncertain whether a conflict or the appearance of a conflict has arisen, Subrecipient shall submit to the State a disclosure statement setting forth the relevant details for the State's consideration. Failure to promptly submit a disclosure statement or to follow the State's direction in regard to the actual or apparent conflict constitutes a breach of this Agreement.

**D. Subrecipient acknowledges that all State employees are subject to the ethical principles described in §24-18-105, C.R.S. Subrecipient further acknowledges that State employees may be subject to the requirements of §24-18-105, C.R.S., with regard to this Agreement. For the avoidance of doubt, an actual or apparent conflict of interest shall exist if Subrecipient employs**

or contracts with any State employee, any former State employee within six months following such employee's termination of employment with the State, or any immediate family member of such current or former State employee. Subrecipient shall provide a disclosure statement as described in §9.C. no later than ten days following entry into a contractual or employment relationship as described in this section. Failure to timely submit a disclosure statement shall constitute a Breach of Agreement. Subrecipient may also be subject to such penalties as are allowed by law.

## 10. INSURANCE

Subrecipient shall obtain and maintain, and ensure that each Subcontractor shall obtain and maintain, insurance as specified in this section at all times during the term of this Agreement. All insurance policies required by this Agreement that are not provided through self-insurance shall be issued by insurance companies as approved by the State.

### A. Workers' Compensation

Workers' compensation insurance as required by state statute, and employers' liability insurance covering all Subrecipient or Subcontractor employees acting within the course and scope of their employment.

### B. General Liability

Commercial general liability insurance covering premises operations, fire damage, independent contractors, products and completed operations, blanket contractual liability, personal injury, and advertising liability with minimum limits as follows:

- i. \$1,000,000 each occurrence;
- ii. \$1,000,000 general aggregate;
- iii. \$1,000,000 products and completed operations aggregate; and
- iv. \$50,000 any 1 fire.

### C. Automobile Liability

Automobile liability insurance covering any auto (including owned, hired and non-owned autos) with a minimum limit of \$1,000,000 each accident combined single limit.

### D. Additional Insured

The State shall be named as additional insured on all commercial general liability policies (leases and construction contracts require additional insured coverage for completed operations) required of Subrecipient and Subcontractors.

### E. Primacy of Coverage

Coverage required of Subrecipient and each Subcontractor shall be primary over any insurance or self-insurance program carried by Subrecipient or the State.

### F. Cancellation

All insurance policies shall include provisions preventing cancellation or non-renewal, except for cancellation based on non-payment of premiums, without at least 30 days prior notice to Subrecipient and Subrecipient shall forward such notice to the State in accordance with §14 within seven days of Subrecipient's receipt of such notice.

### G. Subrogation Waiver

All insurance policies secured or maintained by Subrecipient or its Subcontractors in relation to this Agreement shall include clauses stating that each carrier shall waive all rights of recovery under subrogation or otherwise against Subrecipient or the State, its agencies, institutions, organizations, officers, agents, employees, and volunteers.

### H. Public Entities

If Subrecipient is a "public entity" within the meaning of the Colorado Governmental Immunity Act, §24-10-101, *et seq.*, C.R.S. (the "GIA"), Subrecipient shall maintain, in lieu of the liability insurance requirements stated above, at all times during the term of this Agreement such liability

insurance, by commercial policy or self-insurance, as is necessary to meet its liabilities under the GIA. If a Subcontractor is a public entity within the meaning of the GIA, Subrecipient shall ensure that the Subcontractor maintain at all times during the terms of this Subrecipient, in lieu of the liability insurance requirements stated above, such liability insurance, by commercial policy or self-insurance, as is necessary to meet the Subcontractor's obligations under the GIA.

**I. Certificates**

For each insurance plan provided by Subrecipient under this Agreement, Subrecipient shall provide to the State certificates evidencing Subrecipient's insurance coverage required in this Agreement prior to the Effective Date. Subrecipient shall provide to the State certificates evidencing Subcontractor insurance coverage required under this Agreement prior to the Effective Date, except that, if Subrecipient's subcontract is not in effect as of the Effective Date, Subrecipient shall provide to the State certificates showing Subcontractor insurance coverage required under this Agreement within seven Business Days following Subrecipient's execution of the subcontract. No later than 15 days before the expiration date of Subrecipient's or any Subcontractor's coverage, Subrecipient shall deliver to the State certificates of insurance evidencing renewals of coverage. At any other time during the term of this Agreement, upon request by the State, Subrecipient shall, within seven Business Days following the request by the State, supply to the State evidence satisfactory to the State of compliance with the provisions of this section.

**11. BREACH OF AGREEMENT**

In the event of a Breach of Agreement, the aggrieved Party shall give written notice of breach to the other Party. If the notified Party does not cure the Breach of Agreement, at its sole expense, within 30 days after the delivery of written notice, the Party may exercise any of the remedies as described in §12 for that Party. Notwithstanding any provision of this Agreement to the contrary, the State, in its discretion, need not provide notice or a cure period and may immediately terminate this Agreement in whole or in part or institute any other remedy in this Agreement in order to protect the public interest of the State; or if Subrecipient is debarred or suspended under §24-109-105, C.R.S., the State, in its discretion, need not provide notice or cure period and may terminate this Agreement in whole or in part or institute any other remedy in this Agreement as of the date that the debarment or suspension takes effect.

**12. REMEDIES**

**A. State's Remedies**

If Subrecipient is in breach under any provision of this Agreement and fails to cure such breach, the State, following the notice and cure period set forth in §11, shall have all of the remedies listed in this section in addition to all other remedies set forth in this Agreement or at law. The State may exercise any or all of the remedies available to it, in its discretion, concurrently or consecutively.

**i. Termination for Breach of Agreement**

In the event of Subrecipient's uncured breach, the State may terminate this entire Agreement or any part of this Agreement. Additionally, if Subrecipient fails to comply with any terms of the Federal Award, then the State may, in its discretion or at the direction of a Federal Awarding Agency, terminate this entire Agreement or any part of this Agreement. Subrecipient shall continue performance of this Agreement to the extent not terminated, if any.

**a. Obligations and Rights**

To the extent specified in any termination notice, Subrecipient shall not incur further obligations or render further performance past the effective date of such notice, and shall terminate outstanding orders and subcontracts with third parties. However, Subrecipient shall complete and deliver to the State all Work not cancelled by the termination notice, and may incur obligations as necessary to do so within this Agreement's terms. At the request of the State, Subrecipient shall assign to the State all of Subrecipient's rights, title, and interest in and to such terminated orders or subcontracts. Upon termination, Subrecipient shall take timely, reasonable and

necessary action to protect and preserve property in the possession of Subrecipient but in which the State has an interest. At the State's request, Subrecipient shall return materials owned by the State in Subrecipient's possession at the time of any termination. Subrecipient shall deliver all completed Work Product and all Work Product that was in the process of completion to the State at the State's request.

b. Payments

Notwithstanding anything to the contrary, the State shall only pay Subrecipient for accepted Work received as of the date of termination. If, after termination by the State, the State agrees that Subrecipient was not in breach or that Subrecipient's action or inaction was excusable, such termination shall be treated as a termination in the public interest, and the rights and obligations of the Parties shall be as if this Agreement had been terminated in the public interest under **§2.E**.

c. Damages and Withholding

Notwithstanding any other remedial action by the State, Subrecipient shall remain liable to the State for any damages sustained by the State in connection with any breach by Subrecipient, and the State may withhold payment to Subrecipient for the purpose of mitigating the State's damages until such time as the exact amount of damages due to the State from Subrecipient is determined. The State may withhold any amount that may be due Subrecipient as the State deems necessary to protect the State against loss including, without limitation, loss as a result of outstanding liens and excess costs incurred by the State in procuring from third parties replacement Work as cover.

ii. Remedies Not Involving Termination

The State, in its discretion, may exercise one or more of the following additional remedies:

a. Suspend Performance

Suspend Subrecipient's performance with respect to all or any portion of the Work pending corrective action as specified by the State without entitling Subrecipient to an adjustment in price or cost or an adjustment in the performance schedule. Subrecipient shall promptly cease performing Work and incurring costs in accordance with the State's directive, and the State shall not be liable for costs incurred by Subrecipient after the suspension of performance.

b. Withhold Payment

Withhold payment to Subrecipient until Subrecipient corrects its Work.

c. Deny Payment

Deny payment for Work not performed, or that due to Subrecipient's actions or inactions, cannot be performed or if they were performed are reasonably of no value to the state; provided, that any denial of payment shall be equal to the value of the obligations not performed.

d. Removal

Demand immediate removal of any of Subrecipient's employees, agents, or Subcontractors from the Work whom the State deems incompetent, careless, insubordinate, unsuitable, or otherwise unacceptable or whose continued relation to this Agreement is deemed by the State to be contrary to the public interest or the State's best interest.

e. Intellectual Property

If any Work infringes, or if the State in its sole discretion determines that any Work is likely to infringe, a patent, copyright, trademark, trade secret or other intellectual property right, Subrecipient shall, as approved by the State (i) secure that right to use such Work for the State and Subrecipient; (ii) replace the Work with noninfringing Work or modify the Work so that it becomes noninfringing; or, (iii) remove any infringing Work and refund the amount paid for such Work to the State.

**B. Subrecipient's Remedies**

If the State is in breach of any provision of this Agreement and does not cure such breach, Subrecipient, following the notice and cure period in §11 and the dispute resolution process in §13 shall have all remedies available at law and equity.

**13. DISPUTE RESOLUTION****A. Initial Resolution**

Except as herein specifically provided otherwise, disputes concerning the performance of this Agreement which cannot be resolved by the designated Agreement representatives shall be referred in writing to a senior departmental management staff member designated by the State and a senior manager designated by Subrecipient for resolution.

**B. Resolution of Controversies**

If the initial resolution described in §13.A fails to resolve the dispute within 10 Business Days, Subrecipient shall submit any alleged breach of this Agreement by the State to the Procurement Official of the State Agency named on the Cover Page of this Agreement as described in §24-101-301(30), C.R.S., for resolution following the same resolution of controversies process as described in §§24-106-109, and 24-109-101.1 through 24-109-505, C.R.S., (collectively, the "Resolution Statutes"), except that if Subrecipient wishes to challenge any decision rendered by the Procurement Official, Subrecipient's challenge shall be an appeal to the executive director of the Department of Personnel and Administration, or their delegate, in the same manner as described in the Resolution Statutes before Subrecipient pursues any further action. Except as otherwise stated in this Section, all requirements of the Resolution Statutes shall apply including, without limitation, time limitations regardless of whether the Colorado Procurement Code applies to this Agreement.

**14. NOTICES and REPRESENTATIVES**

Each individual identified as a Principal Representative on the Cover Page for this Agreement shall be the principal representative of the designating Party. All notices required or permitted to be given under this Agreement shall be in writing, and shall be delivered (A) by hand with receipt required, (B) by certified or registered mail to such Party's principal representative at the address set forth on the Cover Page for this Agreement or (C) as an email with read receipt requested to the principal representative at the email address, if any, set forth on the Cover Page for this Agreement. If a Party delivers a notice to another through email and the email is undeliverable, then, unless the Party has been provided with an alternate email contact, the Party delivering the notice shall deliver the notice by hand with receipt required or by certified or registered mail to such Party's principal representative at the address set forth on the Cover Page for this Agreement. Either Party may change its principal representative or principal representative contact information, or may designate specific other individuals to receive certain types of notices in addition to or in lieu of a principal representative, by notice submitted in accordance with this section without a formal amendment to this Agreement. Unless otherwise provided in this Agreement, notices shall be effective upon delivery of the written notice.

**15. RIGHTS IN WORK PRODUCT AND OTHER INFORMATION****A. Work Product**

Subrecipient agrees to provide to the State a royalty-free, non-exclusive and irrevocable license to reproduce publish or otherwise use and to authorize others to use the Work Product described herein, for the Federal Awarding Agency's and State's purposes. All Work Product shall be delivered to the State by Subrecipient upon completion or termination hereof.

**B. Exclusive Property of the State**

Except to the extent specifically provided elsewhere in this Agreement, all State Records, documents, text, software (including source code), research, reports, proposals, specifications, plans, notes, studies, data, images, photographs, negatives, pictures, drawings, designs, models, surveys, maps, materials, ideas, concepts, know-how, and information provided by or on behalf of the State to Subrecipient are the exclusive property of the State (collectively, "State Materials"). Subrecipient shall not use, willingly allow, cause or permit Work Product or State

Materials to be used for any purpose other than the performance of Subrecipient's obligations in this Agreement without the prior written consent of the State. Upon termination of this Agreement for any reason, Subrecipient shall provide all Work Product and State Materials to the State in a form and manner as directed by the State.

C. Exclusive Property of Subrecipient

Subrecipient retains the exclusive rights, title, and ownership to any and all pre-existing materials owned or licensed to Subrecipient including, but not limited to, all pre-existing software, licensed products, associated source code, machine code, text images, audio and/or video, and third-party materials, delivered by Subrecipient under this Agreement, whether incorporated in a Deliverable or necessary to use a Deliverable (collectively, "Subrecipient Property"). Subrecipient Property shall be licensed to the State as set forth in this Agreement or a State approved license agreement: (i) entered into as exhibits to this Agreement, (ii) obtained by the State from the applicable third-party vendor, or (iii) in the case of open source software, the license terms set forth in the applicable open source license agreement.

**16. GENERAL PROVISIONS**

A. Assignment

Subrecipient's rights and obligations under this Agreement are personal and may not be transferred or assigned without the prior, written consent of the State. Any attempt at assignment or transfer without such consent shall be void. Any assignment or transfer of Subrecipient's rights and obligations approved by the State shall be subject to the provisions of this Agreement.

B. Subcontracts

Subrecipient shall not enter into any subaward or subcontract in connection with its obligations under this Agreement without the prior, written approval of the State. Subrecipient shall submit to the State a copy of each such subaward or subcontract upon request by the State. All subawards and subcontracts entered into by Subrecipient in connection with this Agreement shall comply with all applicable federal and state laws and regulations, shall provide that they are governed by the laws of the State of Colorado, and shall be subject to all provisions of this Agreement. If the entity with whom Subrecipient enters into a subcontract or subaward would also be considered a Subrecipient, then the subcontract or subaward entered into by Subrecipient shall also contain provisions permitting both Subrecipient and the State to perform all monitoring of that Subcontractor in accordance with the Uniform Guidance.

C. Binding Effect

Except as otherwise provided in **§16.A**, all provisions of this Agreement, including the benefits and burdens, shall extend to and be binding upon the Parties' respective successors and assigns.

D. Authority

Each Party represents and warrants to the other that the execution and delivery of this Agreement and the performance of such Party's obligations have been duly authorized.

E. Captions and References

The captions and headings in this Agreement are for convenience of reference only, and shall not be used to interpret, define, or limit its provisions. All references in this Agreement to sections (whether spelled out or using the § symbol), subsections, exhibits or other attachments, are references to sections, subsections, exhibits or other attachments contained herein or incorporated as a part hereof, unless otherwise noted.

F. Counterparts

This Agreement may be executed in multiple, identical, original counterparts, each of which shall be deemed to be an original, but all of which, taken together, shall constitute one and the same agreement.

G. Entire Understanding

This Agreement represents the complete integration of all understandings between the Parties related to the Work, and all prior representations and understandings related to the Work, oral or written, are merged into this Agreement. Prior or contemporaneous additions, deletions, or

other changes to this Agreement shall not have any force or effect whatsoever, unless embodied herein.

H. Digital Signatures

If any signatory signs this Agreement using a digital signature in accordance with the Colorado State Controller Contract, Grant and Purchase Order Policies regarding the use of digital signatures issued under the State Fiscal Rules, then any agreement or consent to use digital signatures within the electronic system through which that signatory signed shall be incorporated into this Agreement by reference.

I. Modification

Except as otherwise provided in this Agreement, any modification to this Agreement shall only be effective if agreed to in a formal amendment to this Agreement, properly executed and approved in accordance with applicable Colorado State law and State Fiscal Rules. Modifications permitted under this Agreement, other than Agreement amendments, shall conform to the policies issued by the Colorado State Controller.

J. Statutes, Regulations, Fiscal Rules, and Other Authority.

Any reference in this Agreement to a statute, regulation, State Fiscal Rule, fiscal policy or other authority shall be interpreted to refer to such authority then current, as may have been changed or amended since the Effective Date of this Agreement.

K. External Terms and Conditions

Notwithstanding anything to the contrary herein, the State shall not be subject to any provision included in any terms, conditions, or agreements appearing on Subrecipient's or a Subcontractor's website or any provision incorporated into any click-through or online agreements related to the Work unless that provision is specifically referenced in this Agreement.

L. Severability

The invalidity or unenforceability of any provision of this Agreement shall not affect the validity or enforceability of any other provision of this Agreement, which shall remain in full force and effect, provided that the Parties can continue to perform their obligations under this Agreement in accordance with the intent of this Agreement.

M. Survival of Certain Agreement Terms

Any provision of this Agreement that imposes an obligation on a Party after termination or expiration of this Agreement shall survive the termination or expiration of this Agreement and shall be enforceable by the other Party.

N. Taxes

The State is exempt from federal excise taxes under I.R.C. Chapter 32 (26 U.S.C., Subtitle D, Ch. 32) (Federal Excise Tax Exemption Certificate of Registry No. 84-730123K) and from State and local government sales and use taxes under §§39-26-704(1), *et seq.*, C.R.S. (Colorado Sales Tax Exemption Identification Number 98-02565). The State shall not be liable for the payment of any excise, sales, or use taxes, regardless of whether any political subdivision of the State imposes such taxes on Subrecipient. Subrecipient shall be solely responsible for any exemptions from the collection of excise, sales or use taxes that Subrecipient may wish to have in place in connection with this Agreement.

O. Third Party Beneficiaries

Except for the Parties' respective successors and assigns described in **§16.A**, this Agreement does not and is not intended to confer any rights or remedies upon any person or entity other than the Parties. Enforcement of this Agreement and all rights and obligations hereunder are reserved solely to the Parties. Any services or benefits which third parties receive as a result of this Agreement are incidental to this Agreement, and do not create any rights for such third parties.

P. Waiver

A Party's failure or delay in exercising any right, power, or privilege under this Agreement, whether explicit or by lack of enforcement, shall not operate as a waiver, nor shall any single or

partial exercise of any right, power, or privilege preclude any other or further exercise of such right, power, or privilege.

**Q. CORA Disclosure**

To the extent not prohibited by federal law, this Agreement and the performance measures and standards required under §24-106-107, C.R.S., if any, are subject to public release through the CORA.

**R. Standard and Manner of Performance**

Subrecipient shall perform its obligations under this Agreement in accordance with the highest standards of care, skill and diligence in Subrecipient's industry, trade, or profession.

**S. Licenses, Permits, and Other Authorizations**

- i. Subrecipient shall secure, prior to the Effective Date, and maintain at all times during the term of this Agreement, at its sole expense, all licenses, certifications, permits, and other authorizations required to perform its obligations under this Agreement, and shall ensure that all employees, agents and Subcontractors secure and maintain at all times during the term of their employment, agency or Subcontractor, all license, certifications, permits and other authorizations required to perform their obligations in relation to this Agreement.
- ii. Subrecipient, if a foreign corporation or other foreign entity transacting business in the State of Colorado, shall obtain prior to the Effective Date and maintain at all times during the term of this Agreement, at its sole expense, a certificate of authority to transact business in the State of Colorado and designate a registered agent in Colorado to accept service of process.

State of Colorado and designate a registered agent in Colorado to accept service of process.

**T. Federal Provisions**

Subrecipient shall comply with all applicable requirements of Exhibits C and D at all times during the term of this Agreement.

**U. Accessibility**

- i. Subrecipient shall comply with and the Work Product provided under this Agreement shall be in compliance with all applicable provisions of §§24-85-101, et seq., C.R.S., and the Accessibility Standards for Individuals with a Disability, as established by the Governor's Office of Information Technology (OIT), pursuant to Section §24-85-103 (2.5), C.R.S. Subrecipient shall also comply with all State of Colorado technology standards related to technology accessibility and with Level AA of the most current version of the Web Content Accessibility Guidelines (WCAG), incorporated in the State of Colorado technology standards.
- ii. The State may require Subrecipient's compliance to the State's Accessibility Standards to be determined by a third party selected by the State to attest to Subrecipient's Work Product and software is in compliance with §§24-85-101, et seq., C.R.S., and the Accessibility Standards for Individuals with a Disability as established by OIT pursuant to Section §24-85-103 (2.5), C.R.S.

**17. COLORADO SPECIAL PROVISIONS (COLORADO FISCAL RULE 3-3)**

These Special Provisions apply to all agreements except where noted in italics.

**A. STATUTORY APPROVAL. §24-30-202(1), C.R.S.**

This Agreement shall not be valid until it has been approved by the Colorado State Controller or designee. If this Agreement is for a Major Information Technology Project, as defined in §24-37.5-102(2.6), C.R.S., then this Agreement shall not be valid until it has been approved by the State's Chief Information Officer or designee.

**B. FUND AVAILABILITY. §24-30-202(5.5), C.R.S.**

Financial obligations of the State payable after the current State Fiscal Year are contingent upon funds for that purpose being appropriated, budgeted, and otherwise made available.

**C. GOVERNMENTAL IMMUNITY.**

Liability for claims for injuries to persons or property arising from the negligence of the State, its departments, boards, commissions committees, bureaus, offices, employees and officials shall be controlled and limited by the provisions of the Colorado Governmental Immunity Act,

§24-10-101, et seq., C.R.S.; the Federal Tort Claims Act, 28 U.S.C. Pt. VI, Ch. 171 and 28 U.S.C. 1346(b), and the State's risk management statutes, §§24-30-1501, et seq. C.R.S. No term or condition of this Agreement shall be construed or interpreted as a waiver, express or implied, of any of the immunities, rights, benefits, protections, or other provisions, contained in these statutes.

**D. INDEPENDENT CONTRACTOR.**

Subrecipient shall perform its duties hereunder as an independent contractor and not as an employee. Neither Subrecipient nor any agent or employee of Subrecipient shall be deemed to be an agent or employee of the State. Subrecipient shall not have authorization, express or implied, to bind the State to any agreement, liability or understanding, except as expressly set forth herein. **Subrecipient and its employees and agents are not entitled to unemployment insurance or workers compensation benefits through the State and the State shall not pay for or otherwise provide such coverage for Subrecipient or any of its agents or employees.** Subrecipient shall pay when due all applicable employment taxes and income taxes and local head taxes incurred pursuant to this Agreement. Subrecipient shall (i) provide and keep in force workers' compensation and unemployment compensation insurance in the amounts required by law, (ii) provide proof thereof when requested by the State, and (iii) be solely responsible for its acts and those of its employees and agents.

**E. COMPLIANCE WITH LAW.**

Subrecipient shall comply with all applicable federal and State laws, rules, and regulations in effect or hereafter established, including, without limitation, laws applicable to discrimination and unfair employment practices.

**F. CHOICE OF LAW, JURISDICTION, AND VENUE.**

Colorado law, and rules and regulations issued pursuant thereto, shall be applied in the interpretation, execution, and enforcement of this Agreement. Any provision included or incorporated herein by reference which conflicts with said laws, rules, and regulations shall be null and void. All suits or actions related to this Agreement shall be filed and proceedings held in the State of Colorado and exclusive venue shall be in the City and County of Denver.

**G. PROHIBITED TERMS.**

Any term included in this Agreement that requires the State to indemnify or hold Subrecipient harmless; requires the State to agree to binding arbitration; limits Subrecipient's liability for damages resulting from death, bodily injury, or damage to tangible property; or that conflicts with this provision in any way shall be void ab initio. Nothing in this Agreement shall be construed as a waiver of any provision of §24-106-109, C.R.S.

**H. SOFTWARE PIRACY PROHIBITION.**

State or other public funds payable under this Agreement shall not be used for the acquisition, operation, or maintenance of computer software in violation of federal copyright laws or applicable licensing restrictions. Subrecipient hereby certifies and warrants that, during the term of this Agreement and any extensions, Subrecipient has and shall maintain in place appropriate systems and controls to prevent such improper use of public funds. If the State determines that Subrecipient is in violation of this provision, the State may exercise any remedy available at law or in equity or under this Agreement, including, without limitation, immediate termination of this Agreement and any remedy consistent with federal copyright laws or applicable licensing restrictions.

**I. EMPLOYEE FINANCIAL INTEREST/CONFLICT OF INTEREST. §§24-18-201 and 24-50-507, C.R.S.**

The signatories aver that to their knowledge, no employee of the State has any personal or beneficial interest whatsoever in the service or property described in this Agreement. Subrecipient has no interest and shall not acquire any interest, direct or indirect, that would conflict in any manner or degree with the performance of Subrecipient's services and Subrecipient shall not employ any person having such known interests.

**J. VENDOR OFFSET AND ERRONEOUS PAYMENTS. §§24-30-202(1) and 24-30-202.4, C.R.S.**

**[Not applicable to intergovernmental agreements]** Subject to §24-30-202.4(3.5), C.R.S., the State Controller may withhold payment under the State's vendor offset intercept system for

debts owed to State agencies for: (i) unpaid child support debts or child support arrearages; (ii) unpaid balances of tax, accrued interest, or other charges specified in §§39-21-101, *et seq.*, C.R.S.; (iii) unpaid loans due to the Student Loan Division of the Department of Higher Education; (iv) amounts required to be paid to the Unemployment Compensation Fund; and (v) other unpaid debts owing to the State as a result of final agency determination or judicial action. The State may also recover, at the State's discretion, payments made to Subrecipient in error for any reason, including, but not limited to, overpayments or improper payments, and unexpended or excess funds received by Subrecipient by deduction from subsequent payments under this Agreement, deduction from any payment due under any other contracts, grants or agreements between the State and Subrecipient, or by any other appropriate method for collecting debts owed to the State.

**K. PUBLIC CONTRACTS FOR SERVICES. §§8-17.5-101, *et seq.*, C.R.S.**

*[Not applicable to agreements relating to the offer, issuance, or sale of securities, investment advisory services or fund management services, sponsored projects, intergovernmental agreements, or information technology services or products and services]* Subrecipient certifies, warrants, and agrees that it does not knowingly employ or contract with an illegal alien who will perform work under this Agreement and will confirm the employment eligibility of all employees who are newly hired for employment in the United States to perform work under this Agreement, through participation in the E-Verify Program or the State verification program established pursuant to §8-17.5-102(5)(c), C.R.S., Subrecipient shall not knowingly employ or contract with an illegal alien to perform work under this Agreement or enter into a contract with a Subcontractor that fails to certify to Subrecipient that the Subcontractor shall not knowingly employ or contract with an illegal alien to perform work under this Agreement. Subrecipient (i) shall not use E-Verify Program or the program procedures of the Colorado Department of Labor and Employment ("Department Program") to undertake pre-employment screening of job applicants while this Agreement is being performed, (ii) shall notify the Subcontractor and the contracting State agency or institution of higher education within three days if Subrecipient has actual knowledge that a Subcontractor is employing or contracting with an illegal alien for work under this Agreement, (iii) shall terminate the subcontract if a Subcontractor does not stop employing or contracting with the illegal alien within three days of receiving the notice, and (iv) shall comply with reasonable requests made in the course of an investigation, undertaken pursuant to §8-17.5-102(5), C.R.S., by the Colorado Department of Labor and Employment. If Subrecipient participates in the Department program, Subrecipient shall deliver to the contracting State agency, Institution of Higher Education or political subdivision, a written, notarized affirmation, affirming that Subrecipient has examined the legal work status of such employee, and shall comply with all of the other requirements of the Department program. If Subrecipient fails to comply with any requirement of this provision or §§8-17.5-101, *et seq.*, C.R.S., the contracting State agency, institution of higher education or political subdivision may terminate this Agreement for breach and, if so terminated, Subrecipient shall be liable for damages.

**L. PUBLIC CONTRACTS WITH NATURAL PERSONS. §§24-76.5-101, *et seq.*, C.R.S.**

Subrecipient, if a natural person eighteen (18) years of age or older, hereby swears and affirms under penalty of perjury that Subrecipient (i) is a citizen or otherwise lawfully present in the United States pursuant to federal law, (ii) shall comply with the provisions of §§24-76.5-101, *et seq.*, C.R.S., and (iii) has produced one form of identification required by §24-76.5-103, C.R.S., prior to the Effective Date of this Agreement.

## **EXHIBIT A, STATEMENT OF WORK AND BUDGET**

The work objectives presented below are effective from October 1, 2025, or the Agreement's Effective Date (whichever is later) to December 31, 2026.

### **INTRODUCTION**

The Consolidated Planning Grant (CPG) Scope of Work for FFY-2026 is based on the PACOG adopted FY 2026-2027 Unified Planning Work Program (UPWP) that will be adopted by Resolution ..... on August 28, 2025.

#### **Organization, Management & Funding**

The general objectives of the FFY 2026-2027 UPWP are to:

1. Assist all participating agencies in achieving applicable comprehensive planning goals and in fulfilling the statutory requirements of FAST-Act and associated planning regulations adopted by the FHWA and FTA.
2. Assist all participating agencies in fulfilling their continuing responsibilities to the community including, but not limited to,
  - a) Using the products of the transportation planning process as a major contribution to other comprehensive planning activities and providing the mechanisms for the continued integration of transportation planning with land use and other comprehensive planning.
  - b) Updating and revising basic transportation planning, regional socioeconomic, environmental, land use, and transportation system operating data using applicable GIS or other technologies for these systems.
  - c) Modifying developed plans and programs as warranted by changes in travel patterns or urban conditions and translating plans into action programs for project implementation.
3. Carry out specific transportation planning functions required for the continued certification of the Pueblo area urban transportation planning process including the biennial development and annual refinement of the UPWP, the annual development of the TIP, and updates to financial forecast to the Long-Range Transportation Plan (LRTP) to the horizon of 2045 as needed.

Pueblo Area Council of Governments (PACOG)

SAM UEI : D57UDNFVRBL5, FHWA Award Date: 8/5/2025, CFDA: 20.205,  
FAIN#693JJ2240000Y450COSW03237

| Funds Source              | Federal   | Local<br>Match<br>Cash | Local<br>Match-In<br>Kind | Total<br>Funds |
|---------------------------|-----------|------------------------|---------------------------|----------------|
| FY 2026 CPG Funds         |           |                        |                           |                |
| FY 2026 CPG Funds         | \$309,283 | \$64,292               | \$0                       | \$373,575      |
| Total Revenue for FY 2026 | \$309,283 | \$64,292               | \$0                       | \$373,575      |
|                           |           |                        |                           |                |

2.5% of the funds are required to be spent on Complete Streets activities, unless MPO receives federal approval to opt-out per IIJA Section 11206

## WORK ELEMENT 2610: PROGRAM ADMINISTRATION

Objective - To manage, support, improve, adapt, administer, and coordinate the cooperative, continuous, and comprehensive transportation planning process as required by IIA.

### 1.1: AGREEMENTS AND BYLAWS

#### Activities:

- Complete and execute planning partner memorandum of understandings, as needed, to implement the transportation planning process.
- Update bylaws for Transportation Advisory Commission as needed.
- Amend and update PACOG bylaws as needed.
- Consolidate and update TAC Membership (freight, rail, other community

### partners) 1.2: UNIFIED PLANNING WORK PROGRAM

#### Activities:

- Prepare and submit a Mid-Year UPWP Progress Report.
- Complete year-end report for FY2025.
- Amend 2026 - 2027 UPWP as needed.
- Review and modify the format of the UPWP as needed.
- Prepare and conduct annual review with FHWA and FTA.

### 1.3: FINANCIAL, CONTRACT, AND GRANT MANAGEMENT

#### Activities:

- Track and manage monthly MPO reimbursements.
- Prepare MPO Budget for PACOG Board adoption.
- Manage MPO budget for accuracy and accountability.
- Prepare Sub-Delegation Budget and Appropriation Ordinances for City of Pueblo.
- Prepare for and participate in PACOG audit(s).
- Forecast 2050 LRTP expenses.
- Lead the call of projects process for appropriate funding sources.
- Track and manage other funding pools and grants allocated to the region.
- Track and manage consultant reimbursements.
- Procure, upgrade and/or maintain computer systems, software and equipment required to carry out an efficient and effective transportation planning process

## 1.4: PROFESSIONAL DEVELOPMENT

### Activities:

- Participate in statewide training, workshops, and symposiums hosted by CDOT/FHWA/FTA and other organizations to stay current with innovative planning practices.
- Participate in industry association meetings, workshops, and conferences such as Association for Metropolitan Planning Organization (AMPO), National Association of City Transportation Officials (NACTO), Safe Routes to School (SRTS), National Highway Institute, National Transit, and/or other official organizations that provide innovative and experienced transportation planning processes, procedures, or policy guidance.
- MPO staff to attend professional development training as necessary.

## 1.5: PUBLIC INVOLVEMENT ACTIVITIES

### Activities:

- Utilize the Public Participation Plan to ensure there is effective public participation and outreach.
- Issue press releases and advisories related to transportation planning and projects in the region.
- Post notifications, resources, and public outreach opportunities on PACOG/MPO social media feeds, [pacog.net](http://pacog.net), and Pueblo Chieftain.
- Provide educational materials and resources about transportation in

## Pueblo County. 1.6: TITLE VI

### Activities:

- Meet federal and state reporting requirements for Title VI and Americans with Disabilities Act (ADA).
- Process complaint forms and review all projects for Title VI/ADA

## Compliance. 1.7: MPO MEETINGS

### Activities:

- Prepare for and provide information to PACOG Board meetings.
- Prepare and conduct 10-12 TAC meetings annually.
- Prepare and publish TAC meeting minutes.
- Maintain TAC membership and directory lists.

- Utilize PACOG Board and TAC feedback.
- Create subcommittees as needed.
- Assist in maintaining required materials as necessary for PACOG. (i.e. Agendas, Minutes, Financial Records, etc.).

## 1.8: TRANSPORTATION IMPROVEMENT PROGRAM

### Activities:

- Ensure that all expected funding sources are accurately accounted for and programmed, consistent with policies to ensure adoption by PACOG, CDOT, and FHWA.
- Prepare, coordinate, and distribute required administrative modifications and amendments to the adopted TIP following a review of compliance/progress verification, along with submittal of corresponding request for inclusion in the State Transportation Improvement Program (STIP).
- Produce and distribute an annual list of projects obligated to the prior FFY within.
- Update and post project amendments to “TIP Tracker” on pacog.net.
- In accordance with state and federal requirements and policies, analyze the potential impacts on people, people’s livelihood, and quality of life of proposed projects.

## WORK ELEMENT 2620: DATA COLLECTION, ANALYSIS, AND MANAGEMENT

Objective – to develop and maintain data necessary for informed decision making relating to the MPO transportation system.

## 2.1: TRAFFIC COUNTING AND DATA MANAGEMENT

### Activities:

- Collect, manage, and share traffic count data be used as a resource and tool for planning and projects and policy development.
- Collect, manage, and share bike/pedestrian counting on known routes and trails for planning, projects and policy development.
- Conduct before and after data collection of projects and/or policies to analyze effectiveness and performance measures.
- Update GIS Map.

## 2.2: TRAFFIC CRASH MONITORING PROGRAM

### Activities:

- Utilize and share crash data for planning and projects.
- Prepare Top 25 high crash locations and mitigation measures for PACOG Board, TAC, and other agencies for action.
- Develop summary reports and maps with crash data to assist planning partners in identifying potential safety improvement projects.
- Update MPO GIS Crash Map

## 2.3: REGIONAL PLANNING GIS (BROAD)

### Activities:

- Update MPO Databases and GIS layers as information becomes available.
- Ensure PACOG ArcGIS maps are accessible to partner agencies and public.
- Update Regional Bicycle & Multi-Use Trail System with new, planned/proposed infrastructure.
- Develop and update the PACOG Vision Map to reflect changes to the future transportation network as modified by local, and county government actions.
- Create and print new Regional Bicycle & Multi-Use Trail System maps.

## 2.4: TRAVEL DEMAND MODEL

### Activities:

- Run project scenarios based on projects identified in the 2050 LRTP and new developments.
  - Update local transportation system data to reflect changes to the future transportation network as modified by local or county government actions.
  - Supply CDOT with Data from Model runs that contain “Regionally Significant” projects
  - Attend TransCAD training as needed.
  - Provide Pueblo Planning Model (PPM) data to local agencies and developers, as requested.
- Utilize updated Land-use and population data for PPM.

## 2.5: GENERAL DATABASE MANAGEMENT

### Activities:

- Provide current transportation planning materials, data, and maps as requested by citizens and various agencies.
- Organize and maintain MPO files and folders.
- Maintain MPO website and ensure ADA compliance.

## WORK ELEMENT 2630: REGIONAL AND MULTIMODAL PLANNING AND COORDINATION

Objective- Work collaboratively with local, state, and federal officials and agencies to help achieve established transportation goals and objectives.

### 3.1: REGIONAL TRANSPORTATION PLANNING

#### Activities:

- Develop and adopt 2050 Long Range Transportation Plan
- Monitor the approved 2050 LRTP and make amendments where significant changes have been identified.
- Review local plans for consistency with the LRTP.

### 3.2: COMPLETE STREETS

#### Activities:

- Plan and coordinate with regional stakeholders to develop safe streets for all users through a comprehensive Complete Streets Policy.
- Develop and support policies, plans, and projects for pedestrians, bicyclists, transit riders, micro-mobility users, freight delivery services, and motorists to have a safe, and accessible route to their destination.
- Provide an equitable and safe transportation network for travelers of all ages and abilities.
- Work with local agencies to update roadway standards and classifications that incorporate complete streets design and methods.
- Work with local agencies to identify processes and procedures to encourage and implement a complete street policy.
- Provide peer to peer training opportunities to encourage and implement complete streets policies
- Provide complete street resources to local agencies and stakeholders.

### 3.3: ACTIVE TRANSPORTATION PLANNING & COORDINATION:

#### Activities:

- Update 2020 Bicycle and Pedestrian Master Plan.
- Participate and support bicycle transportation activities.
- Support active transportation infrastructure plans, projects, and policies.
- Plan and coordinate bicycle infrastructure connectivity and access with other jurisdictions, stakeholders, advocates, and developers.
- Improve access for non-motorized travel in areas where people are more dependent on walking and biking as a form of transportation.
- Coordinate with CDOT on On-system active transportation safety, connectivity, and access.
- Communicate and collaborate with Pueblo Active Community Environment (PACE) on bicycle and pedestrian plans, policies, and projects.

### 3.4: PUEBLO TRANSIT PLANNING AND COORDINATION:

#### Activities:

- Develop plans, projects, and policies that support Pueblo Transit's current and future system and operations.
- Assist with grant applications by providing data and background supporting information.
- Incorporate transit planning as a requirement when selecting projects for funding.
- Partner with Pueblo Transit to resolve transportation issues affecting Transit within the region.
- Provide Pueblo Transit
  - Support for route expansion studies and analysis
  - Increased Ridership modeling and analysis
  - National Transit Database data collection for federal reporting.
  - Route consolidation and expansion planning
  - Facility Cost Analysis
  - Support for Infrastructure improvements.
- Improve access and service for public transportation in areas where there is need.
- Support public transportation economic efficiency.
- Plan for demand-response service towards communities with higher concentrations of older adults and those with poor access to essential services.
- Ensure that transit-oriented development is equitable and sustainable.

### 3.5: IMPLEMENTATION OF PERFORMANCE MEASURES & SAFETY

#### Activities:

- Amend and/or adopt new PACOG Safety Performance Measure (PM 1) targets.
- Utilize data to determine if PACOG's Safety performance measure targets are being met and provide report to board annually.
- Amend and/or adopt performance measures for infrastructure condition (PM2) and system performance (PM3) as needed to be consistent with state-wide measures.
- Report annually on goals of the established measures.
- Plan for safety of all road users through policies, plan, and projects.

### 3.6: RESILIENT FUTURE AND LAND USE PLANNING

#### Activities:

- Develop, implement, and support strategies that will provide for cleaner air.
- Complete Greenhouse Gas (GHG) Conformity Report as required by Colorado Revised Statutes §43-4-1103 and the Code of Colorado Regulations (2 CCR 601-22, Section 8.02.5.1).
- Identify barriers to and opportunities for deployment of fueling and charging infrastructure.
- Evaluate opportunities to reduce single-occupancy vehicle trips.
- Implement planning and environmental linkages (PEL) as part of the transportation planning and environmental review process.
- Provide PEL resources and educational training to local jurisdictions.
- Create PEL methodologies for transportation planning in PACOG region.
- Identify transportation system vulnerabilities due to unforeseen impacts and evaluate potential solutions.
- Evaluate development impacts which may require amendments to the adopted Long Range Transportation Plan and/or Transportation Improvement Program.
- Review land use issues affecting the transportation system.

### 3.7: STATEWIDE TRANSPORTATION PLANNING

#### Activities:

- Regular participation in regional planning activities in cooperation with PACOG member entities.
- Regular attendance at State Transportation Advisory Committee (STAC) meetings.
- Attendance at Transportation Commission (TC) meetings if necessary to represent the interests of the PACOG MPO/TPR.

- Participation and support the Southwest Chieftain North Front Range Passenger Rail Commission.
- Participation in joint or coordinated planning studies conducted cooperatively by the four Front Range MPOs.
- Regular participation in statewide committees for special studies that may have impacts in the PACOG MPO area, (i.e. Freight, Rail, Intracity transit).
- Coordinate with Federal Land Management Agency in the transportation planning and project programming process on infrastructure and connectivity needs related to access routes and other public roads and transportation services that connect to Federal lands.

## WORK ELEMENT 2640 CONSULTATION SERVICES AND SPECIAL PROJECTS

Objective – This work element is developed as a placeholder for funding used for consultant’s services to assist with planning activities that have been identified in the UPWP that MPO staff may need assistance with. CPG funding will be used for this work. The UPWP will be amended

should project scope fall outside of work identified in this document or the below examples. General consultant services may be used for Long Range Transportation Plan activities, traffic count program, Travel Demand Modeling, Pavement Condition Rating, Safety Action plans or Planning studies.

### 4.1: ON-CALL TRANSPORTATION TECHNICAL ASSISTANCE CONSULTANT

Activities:

- Adopt 2050 LRTP.
- Send out request for services to our two contracted On-Call Consultants, Bohannon Huston and Wilson & CO for any planning activities identified above using CPG funding.
- Aid on plans, reports, and/or studies that require computer simulation/visualization of corridors, projects, systems, or road networks as needed.
- Provide updated GIS data (shape files) to MPO such as:
  - New roadways
  - Proposed roadways
  - New trails/bike routes/bike lanes
- Roadway classifications

## 4.2: CONSULTATION SERVICES

### Activities:

- Release request for proposal for any planning activities identified above using CPG funding.
- Aid on plans, reports, and/or studies that require computer simulation/visualization of corridors, projects, systems, or road networks as needed.
- Provide updated GIS data (shape files) to MPO such as:
  - New roadways
  - Proposed roadways
  - New trails/bike routes/bike lanes
  - Roadway classifications
- Provide Pueblo Transit:
  - Transit Relocation and Equity Study.
  - Route expansion studies and analysis
  - Increased Ridership modeling and analysis
  - Route consolidation and expansion planning
  - Update 2017 Transit Plan
  - Infrastructure improvements.
- Provide Updates to Bicycle and Pedestrian Master Plan.
- Develop and create transportation safety campaigns for PACOG area.

## EXHIBIT B, SAMPLE OPTION LETTER

**State Agency**

Department of Transportation

**Subrecipient**

[Insert Subrecipient's Full Legal Name, including "Inc.", "LLC", etc.]

**Current Agreement Maximum Amount**

**Initial Term**

5310 Funds Maximum Amount

State Fiscal Year [20xx] [\$0.00]

**Extension Terms**

State Fiscal Year [20xx] [\$0.00]

State Fiscal Year [20xx] [\$0.00]

State Fiscal Year [20xx] [\$0.00]

State Fiscal Year [20xx] [\$0.00]

Local Funds [\$0.00]

Total for All Agreement Terms [\$0.00]

**Option Letter Number**

[Insert the Option Number (e.g. "1" for the first option)]

**Original Agreement Number**

[Insert CMS number or Other Contract Number of the Original Contract]

**Option Agreement Number**

[Insert CMS number or Other Contract Number of this Option]

**Agreement Performance Beginning Date**

[Month, Day, Year]

**Current Agreement Expiration Date**

[Month, Day, Year]

**1. OPTIONS:**

A. Option to extend for an Extension Term

**2. REQUIRED PROVISIONS:**

A. **For use with Option 1(A):** In accordance with Section(s) 2.B/2.C of the Original Agreement referenced above, the State hereby exercises its option for an additional term/end of term extension, beginning Insert start date and ending on the current agreement expiration date shown above, at the rates stated in the Original Agreement, as amended.

**3. OPTION EFFECTIVE DATE:**

A. The effective date of this Option Letter is upon approval of the State Controller or or [Enter date], whichever is later.

STATE OF COLORADO  
Jared S. Polis, Governor  
Department of Transportation  
Shoshana M. Lew, Executive Director

In accordance with §24-30-202, C.R.S., this Option is not valid until signed and dated below by the State Controller or an authorized delegate.

STATE CONTROLLER  
Robert Jaros, CPA, MBA, JD

By: [Name & Title of Person Signing for Agency or IHE]

Date: \_\_\_\_\_

By: \_\_\_\_\_  
[Name of Agency or IHE Delegate-Please delete if agreement will be routed to OSC for approval]

Option Effective Date: \_\_\_\_\_

## EXHIBIT C, FEDERAL PROVISIONS

### 1. APPLICABILITY OF PROVISIONS.

- 1.1. The Grant to which these Federal Provisions are attached has been funded, in whole or in part, with an Award of Federal funds. In the event of a conflict between the provisions of these Federal Provisions, the Special Provisions, the body of the Grant, or any attachments or exhibits incorporated into and made a part of the Grant, the provisions of these Federal Provisions shall control.
- 1.2. The State of Colorado is accountable to Treasury for oversight of their subrecipients, including ensuring their subrecipients comply with federal statutes, Award Terms and Conditions, Treasury's Final Rule, and reporting requirements, as applicable.
- 1.3. Additionally, any subrecipient that issues a subaward to another entity (2<sup>nd</sup> tier subrecipient), must hold the 2<sup>nd</sup> tier subrecipient accountable to these provisions and adhere to reporting requirements.
- 1.4. These Federal Provisions are subject to the Award as defined in §2 of these Federal Provisions, as may be revised pursuant to ongoing guidance from the relevant Federal or State of Colorado agency or institutions of higher education.

### 2. DEFINITIONS.

- 2.1. For the purposes of these Federal Provisions, the following terms shall have the meanings ascribed to them below.
  - 2.1.1. "Award" means an award of Federal financial assistance, and the Grant setting forth the terms and conditions of that financial assistance, that a non-Federal Entity receives or administers.
  - 2.1.2. "Entity" means:
    - 2.1.2.1. a Non-Federal Entity;
    - 2.1.2.2. a foreign public entity;
    - 2.1.2.3. a foreign organization;
    - 2.1.2.4. a non-profit organization;
    - 2.1.2.5. a domestic for-profit organization (for 2 CFR parts 25 and 170 only);
    - 2.1.2.6. a foreign non-profit organization (only for 2 CFR part 170) only);
    - 2.1.2.7. a Federal agency, but only as a Subrecipient under an Award or Subaward to a non-Federal entity (or 2 CFR 200.1); or
    - 2.1.2.8. a foreign for-profit organization (for 2 CFR part 170 only).
  - 2.1.3. "Executive" means an officer, managing partner or any other employee in a management position.
  - 2.1.4. "Expenditure Category (EC)" means the category of eligible uses as defined by the US Department of Treasury in "Appendix 1 of the Compliance and Reporting Guidance, State and Local Fiscal Recovery Funds" report available at [www.treasury.gov](http://www.treasury.gov).

- 2.1.5. “Federal Awarding Agency” means a Federal agency providing a Federal Award to a Recipient as described in 2 CFR 200.1
- 2.1.6. “Grant” means the Grant to which these Federal Provisions are attached.
- 2.1.7. “Grantee” means the party or parties identified as such in the Grant to which these Federal Provisions are attached.
- 2.1.8. “Non-Federal Entity means a State, local government, Indian tribe, institution of higher education, or nonprofit organization that carries out a Federal Award as a Recipient or a Subrecipient.
- 2.1.9. “Nonprofit Organization” means any corporation, trust, association, cooperative, or other organization, not including IHEs, that:
  - 2.1.9.1. Is operated primarily for scientific, educational, service, charitable, or similar purposes in the public interest;
  - 2.1.9.2. Is not organized primarily for profit; and
  - 2.1.9.3. Uses net proceeds to maintain, improve, or expand the operations of the organization.
- 2.1.10. “OMB” means the Executive Office of the President, Office of Management and Budget.
- 2.1.11. “Pass-through Entity” means a non-Federal Entity that provides a Subaward to a Subrecipient to carry out part of a Federal program.
- 2.1.12. “Prime Recipient” means the Colorado State agency or institution of higher education identified as the Grantor in the Grant to which these Federal Provisions are attached.
- 2.1.13. “Subaward” means an award by a Prime Recipient to a Subrecipient funded in whole or in part by a Federal Award. The terms and conditions of the Federal Award flow down to the Subaward unless the terms and conditions of the Federal Award specifically indicate otherwise in accordance with 2 CFR 200.101. The term does not include payments to a Contractor or payments to an individual that is a beneficiary of a Federal program.
- 2.1.14. “Subrecipient” or “Subgrantee” means a non-Federal Entity (or a Federal agency under an Award or Subaward to a non-Federal Entity) receiving Federal funds through a Prime Recipient to support the performance of the Federal project or program for which the Federal funds were awarded. A Subrecipient is subject to the terms and conditions of the Federal Award to the Prime Recipient, including program compliance requirements. The term does not include an individual who is a beneficiary of a federal program. For SLFRF Grants, a subrecipient relationship continues to exist for Expenditure Category 6.1 Revenue Replacement.

- 2.1.15. “System for Award Management (SAM)” means the Federal repository into which an Entity must enter the information required under the Transparency Act, which may be found at <http://www.sam.gov>. “Total Compensation” means the cash and noncash dollar value earned by an Executive during the Prime Recipient’s or Subrecipient’s preceding fiscal year (see 48 CFR 52.204-10, as prescribed in 48 CFR 4.1403(a)) and includes the following:
- 2.1.15.1. Salary and bonus;
  - 2.1.15.2. Awards of stock, stock options, and stock appreciation rights, using the dollar amount recognized for financial statement reporting purposes with respect to the fiscal year in accordance with the Statement of Financial Accounting Standards No. 123 (Revised 2005) (FAS 123R), Shared Based Payments;
  - 2.1.15.3. Earnings for services under non-equity incentive plans, not including group life, health, hospitalization or medical reimbursement plans that do not discriminate in favor of Executives and are available generally to all salaried employees;
  - 2.1.15.4. Change in present value of defined benefit and actuarial pension plans;
  - 2.1.15.5. Above-market earnings on deferred compensation which is not tax-qualified;
  - 2.1.15.6. Other compensation, if the aggregate value of all such other compensation (e.g., severance, termination payments, value of life insurance paid on behalf of the employee, perquisites or property) for the Executive exceeds \$10,000.
- 2.1.16. “Transparency Act” means the Federal Funding Accountability and Transparency Act of 2006 (Public Law 109-282), as amended by §6202 of Public Law 110-252.
- 2.1.17. “Uniform Guidance” means the Office of Management and Budget Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. The terms and conditions of the Uniform Guidance flow down to Awards to Subrecipients unless the Uniform Guidance or the terms and conditions of the Federal Award specifically indicate otherwise.
- 2.1.18. “Unique Entity ID Number” means the Unique Entity ID established by the federal government for a Grantee at <https://sam.gov/content/home>

### 3. COMPLIANCE.

- 3.1. Grantee shall comply with all applicable provisions of the Transparency Act and the regulations issued pursuant thereto, all provisions of the Uniform Guidance, and all applicable Federal Laws and regulations required by this Federal Award. Any revisions to such provisions or regulations shall automatically become a part of these Federal Provisions, without the necessity of either party executing any further instrument. The State of Colorado, at its discretion, may provide written notification to Grantee of such revisions, but such notice shall not be a condition precedent to the effectiveness of such revisions.
- 3.2. Per US Treasury Final Award requirements, grantee programs or services must not include terms or conditions that undermine efforts to stop COVID-19 or discourage compliance with recommendations and CDC guidelines.

### 4. SYSTEM FOR AWARD MANAGEMENT (SAM) AND UNIQUE ENTITY ID SYSTEM (UEI) REQUIREMENTS.

- 4.1. SAM. Grantee shall maintain the currency of its information in SAM until the Grantee submits the final financial report required under the Award or receives final payment, whichever is later. Grantee shall review and update SAM information at least annually.
- 4.2. UEI. Grantee shall provide its Unique Entity ID to its Prime Recipient, and shall update Grantee's information in SAM.gov at least annually.

### 5. TOTAL COMPENSATION.

- 5.1. Grantee shall include Total Compensation in SAM for each of its five most highly compensated Executives for the preceding fiscal year if:
  - 5.1.1. The total Federal funding authorized to date under the Award is \$30,000 or more; and
  - 5.1.2. In the preceding fiscal year, Grantee received:
    - 5.1.2.1. 80% or more of its annual gross revenues from Federal procurement Agreements and Subcontractors and/or Federal financial assistance Awards or Subawards subject to the Transparency Act; and
    - 5.1.2.2. \$30,000,000 or more in annual gross revenues from Federal procurement Agreements and Subcontractors and/or Federal financial assistance Awards or Subawards subject to the Transparency Act; and
    - 5.1.2.3. 5.1.2.3 The public does not have access to information about the compensation of such Executives through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d) or § 6104 of the Internal Revenue Code of 1986.

**6. REPORTING.**

- 6.1. If Grantee is a Subrecipient of the Award pursuant to the Transparency Act, Grantee shall report data elements to SAM and to the Prime Recipient as required in this Exhibit. No direct payment shall be made to Grantee for providing any reports required under these Federal Provisions and the cost of producing such reports shall be included in the Grant price. The reporting requirements in this Exhibit are based on guidance from the OMB, and as such are subject to change at any time by OMB. Any such changes shall be automatically incorporated into this Grant and shall become part of Grantee's obligations under this Grant.

**7. EFFECTIVE DATE AND DOLLAR THRESHOLD FOR FEDERAL REPORTING.**

- 7.1. Reporting requirements in §8 below apply to new Awards as of October 1, 2010, if the initial award is \$30,000 or more. If the initial Award is below \$30,000 but subsequent Award modifications result in a total Award of \$30,000 or more, the Award is subject to the reporting requirements as of the date the Award exceeds \$30,000. If the initial Award is \$30,000 or more, but funding is subsequently de-obligated such that the total award amount falls below \$30,000, the Award shall continue to be subject to the reporting requirements. If the total award is below \$30,000 no reporting required; if more than \$30,000 and less than \$50,000 then FFATA reporting is required; and, \$50,000 and above SLFRF reporting is required.
- 7.2. The procurement standards in §9 below are applicable to new Awards made by Prime Recipient as of December 26, 2015. The standards set forth in §11 below are applicable to audits of fiscal years beginning on or after December 26, 2014.

**8. SUBRECIPIENT REPORTING REQUIREMENTS. [INTENTIONALLY DELETED]****9. PROCUREMENT STANDARDS.**

- 9.1. Procurement Procedures. A Subrecipient shall use its own documented procurement procedures which reflect applicable State, local, and Tribal laws and applicable regulations, provided that the procurements conform to applicable Federal law and the standards identified in the Uniform Guidance, including without limitation, 2 CFR 200.318 through 200.327 thereof.
- 9.2. Domestic preference for procurements (2 CFR 200.322). As appropriate and to the extent consistent with law, the non-Federal entity should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States (including but not limited to iron, aluminum, steel, cement, and other manufactured products). The requirements of this section must be included in all subawards including all Agreements and purchase orders for work or products under this award.

- 9.3. **Procurement of Recovered Materials.** If a Subrecipient is a State Agency or an agency of a political subdivision of the State, its Contractors must comply with section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247, that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired during the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

**10. ACCESS TO RECORDS.**

- 10.1. A Subrecipient shall permit Prime Recipient and its auditors to have access to Subrecipient's records and financial statements as necessary for Recipient to meet the requirements of 2 CFR 200.332 (Requirements for pass-through entities), 2 CFR 200.300 (Statutory and national policy requirements) through 2 CFR 200.309 (Period of performance), and Subpart F-Audit Requirements of the Uniform Guidance.

**11. SINGLE AUDIT REQUIREMENTS.**

- 11.1. If a Subrecipient expends \$750,000 or more in Federal Awards during the Subrecipient's fiscal year, the Subrecipient shall procure or arrange for a single or program-specific audit conducted for that year in accordance with the provisions of Subpart F-Audit Requirements of the Uniform Guidance, issued pursuant to the Single Audit Act Amendments of 1996, (31 U.S.C. 7501-7507). 2 CFR 200.501.

- 11.1.1. **Election.** A Subrecipient shall have a single audit conducted in accordance with Uniform Guidance 2 CFR 200.514 (Scope of audit), except when it elects to have a program-specific audit conducted in accordance with 2 CFR 200.507 (Program-specific audits). The Subrecipient may elect to have a program-specific audit if Subrecipient expends Federal Awards under only one Federal program (excluding research and development) and the Federal program's statutes, regulations, or the terms and conditions of the Federal award do not require a financial statement audit of Prime Recipient. A program-specific audit may not be elected for research and development unless all of the Federal Awards expended were received from Recipient and Recipient approves in advance a program-specific audit.

- 11.1.2. **Exemption.** If a Subrecipient expends less than \$750,000 in Federal Awards during its fiscal year, the Subrecipient shall be exempt from Federal audit requirements for that year, except as noted in 2 CFR 200.503 (Relation to other audit requirements), but records shall be available for review or audit by appropriate officials of the Federal agency, the State, and the Government Accountability Office.

11.1.3. **Subrecipient Compliance Responsibility.** A Subrecipient shall procure or otherwise arrange for the audit required by Subpart F of the Uniform Guidance and ensure it is properly performed and submitted when due in accordance with the Uniform Guidance. Subrecipient shall prepare appropriate financial statements, including the schedule of expenditures of Federal awards in accordance with 2 CFR 200.510 (Financial statements) and provide the auditor with access to personnel, accounts, books, records, supporting documentation, and other information as needed for the auditor to perform the audit required by Uniform Guidance Subpart F-Audit Requirements.

## **12. GRANT PROVISIONS FOR SUBRECIPIENT AGREEMENTS.**

12.1. In addition to other provisions required by the Federal Awarding Agency or the Prime Recipient, Grantees that are Subrecipients shall comply with the following provisions. Subrecipients shall include all of the following applicable provisions in all Subcontractors entered into by it pursuant to this Grant.

12.1.1. [Applicable to federally assisted construction Agreements.] **Equal Employment Opportunity.** Except as otherwise provided under 41 CFR Part 60, all Agreements that meet the definition of “federally assisted construction Agreement” in 41 CFR Part 60-1.3 shall include the equal opportunity clause provided under 41 CFR 60-1.4(b), in accordance with Executive Order 11246, “Equal Employment Opportunity” (30 FR 12319, 12935, 3 CFR Part, 1964-1965 Comp., p. 339), as amended by Executive Order 11375, “Amending Executive Order 11246 Relating to Equal Employment Opportunity,” and implementing regulations at 41 CFR part 60, Office of Federal Agreement Compliance Programs, Equal Employment Opportunity, Department of Labor.

12.1.2. [Applicable to on-site employees working on government-funded construction, alteration and repair projects.] **Davis-Bacon Act.** Davis-Bacon Act, as amended (40 U.S.C. 3141-3148).

12.1.3. **Rights to Inventions Made Under a grant or agreement.** If the Federal Award meets the definition of “funding agreement” under 37 CFR 401.2 (a) and the Prime Recipient or Subrecipient wishes to enter into an Agreement with a small business firm or nonprofit organization regarding the substitution of parties, assignment or performance of experimental, developmental, or research work under that “funding agreement,” the Prime Recipient or Subrecipient must comply with the requirements of 37 CFR Part 401, “Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Agreements and Cooperative Agreements,” and any implementing regulations issued by the Federal Awarding Agency.

- 12.1.4. Clean Air Act (42 U.S.C. 7401-7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended. Agreements and subgrants of amounts in excess of \$150,000 must contain a provision that requires the non-Federal awardees to agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401-7671q) and the Federal Water Pollution Control Act as amended (33 U.S.C. 1251-1387). Violations must be reported to the Federal Awarding Agency and the Regional Office of the Environmental Protection Agency (EPA).
- 12.1.5. Debarment and Suspension (Executive Orders 12549 and 12689). A Agreement award (see 2 CFR 180.220) must not be made to parties listed on the government wide exclusions in SAM, in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR part 1986 Comp., p. 189) and 12689 (3 CFR part 1989 Comp., p. 235), "Debarment and Suspension." SAM Exclusions contains the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.
- 12.1.6. Byrd Anti-Lobbying Amendment (31 U.S.C. 1352). Contractors that apply or bid for an award exceeding \$100,000 must file the required certification. Each tier certifies to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal Agreement, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the non-Federal award.
- 12.1.7. Never Contract with the Enemy (2 CFR 200.215). Federal awarding agencies and recipients are subject to the regulations implementing "Never Contract with the Enemy" in 2 CFR part 183. The regulations in 2 CFR part 183 affect covered Agreements, grants and cooperative agreements that are expected to exceed \$50,000 within the period of performance, are performed outside the United States and its territories, and are in support of a contingency operation in which members of the Armed Forces are actively engaged in hostilities.
- 12.1.8. Prohibition on certain telecommunications and video surveillance services or equipment (2 CFR 200.216). Grantee is prohibited from obligating or expending loan or grant funds on certain telecommunications and video surveillance services or equipment pursuant to 2 CFR 200.216.

12.1.9. Title VI of the Civil Rights Act. The Subgrantee, Contractor, Subcontractor, transferee, and assignee shall comply with Title VI of the Civil Rights Act of 1964, which prohibits recipients of federal financial assistance from excluding from a program or activity, denying benefits of, or otherwise discriminating against a person on the basis of race, color, or national origin (42 U.S.C. § 2000d et seq.), as implemented by the Department of Treasury's Title VI regulations, 31 CFR Part 22, which are herein incorporated by reference and made a part of this Agreement (or agreement). Title VI also includes protection to persons with "Limited English Proficiency" in any program or activity receiving federal financial assistance, 42 U.S. C. § 2000d et seq., as implemented by the Department of the Treasury's Title VI regulations, 31 CRF Part 22, and herein incorporated by reference and made part of this Agreement or agreement.

### **13. CERTIFICATIONS.**

- 13.1. Subrecipient Certification. Subrecipient shall sign a "State of Colorado Agreement with Recipient of Federal Recovery Funds" Certification Form in Exhibit E and submit to State Agency with signed grant agreement.
- 13.2. Unless prohibited by Federal statutes or regulations, Prime Recipient may require Subrecipient to submit certifications and representations required by Federal statutes or regulations on an annual basis. 2 CFR 200.208. Submission may be required more frequently if Subrecipient fails to meet a requirement of the Federal award. Subrecipient shall certify in writing to the State at the end of the Award that the project or activity was completed or the level of effort was expended. 2 CFR 200.201(3). If the required level of activity or effort was not carried out, the amount of the Award must be adjusted.

### **14. EXEMPTIONS.**

- 14.1. These Federal Provisions do not apply to an individual who receives an Award as a natural person, unrelated to any business or non-profit organization he or she may own or operate in his or her name.
- 14.2. A Grantee with gross income from all sources of less than \$300,000 in the previous tax year is exempt from the requirements to report Subawards and the Total Compensation of its most highly compensated Executives.

### **15. EVENT OF DEFAULT AND TERMINATION.**

- 15.1. Failure to comply with these Federal Provisions shall constitute an event of default under the Grant and the State of Colorado may terminate the Grant upon 30 days prior written notice if the default remains uncured five calendar days following the termination of the 30-day notice period. This remedy will be in addition to any other remedy available to the State of Colorado under the Grant, at law or in equity.
- 15.2. Termination (2 CFR 200.340). The Federal Award may be terminated in whole or in part as follows:

- 15.2.1. By the Federal Awarding Agency or Pass-through Entity, if a Non-Federal Entity fails to comply with the terms and conditions of a Federal Award;
- 15.2.2. By the Federal awarding agency or Pass-through Entity, to the greatest extent authorized by law, if an award no longer effectuates the program goals or agency priorities;
- 15.2.3. By the Federal awarding agency or Pass-through Entity with the consent of the Non-Federal Entity, in which case the two parties must agree upon the termination conditions, including the effective date and, in the case of partial termination, the portion to be terminated;
- 15.2.4. By the Non-Federal Entity upon sending to the Federal Awarding Agency or Pass-through Entity written notification setting forth the reasons for such termination, the effective date, and, in the case of partial termination, the portion to be terminated. However, if the Federal Awarding Agency or Pass-through Entity determines in the case of partial termination that the reduced or modified portion of the Federal Award or Subaward will not accomplish the purposes for which the Federal Award was made, the Federal Awarding Agency or Pass-through Entity may terminate the Federal Award in its entirety; or
- 15.2.5. By the Federal Awarding Agency or Pass-through Entity pursuant to termination provisions included in the Federal Award.

**EXHIBIT D, ADDITIONAL PROGRAM REQUIREMENTS****A. Work**

Per 23 CFR 420.111, SUBRECIPIENT shall complete the Work and other obligations as described herein and Exhibit A. Work performed prior to the Effective Date or after the Termination date shall not be considered part of the Work. SUBRECIPIENT shall take all reasonable steps to carry out all activities described and identified in the Statement of Work. The Statement shall include an estimation of anticipated benefits from each program submitted, a Budget, the activity purpose, objectives, major tasks, timeline of expected completion, and an Evaluation process to determine the success of each activity stated in Exhibit A. In addition, SUBRECIPIENT shall be responsible for:

- 1.) The initial design and implementation of its congestion mitigation and air quality program as outlined in the current TIP;
- 2.) Monitoring and Evaluating the program effectiveness;
- 3.) The promotion of congestion mitigation and air quality program(s) by employers;
- 4.) Submittal of an annual report to CDOT; and,
- 5.) Submitting annual results to CDOT.

**B. Notice**

SUBRECIPIENT shall not commence Work until the date specified by a written notice, which may be electronic, and shall complete the Work within the period specified in the Agreement unless the period or terms thereof are extended according to this Agreement.

**C. Staff/Consultant Services**

SUBRECIPIENT shall be responsible to select staff/consultant services in compliance with all applicable federal procurement requirements including 23 CFR 172 and 2 CFR 200. Any Request for Proposal (RFP) used by SUBRECIPIENT to secure consultant Services must be reviewed by CDOT before SUBRECIPIENT releases the RFP. CDOT shall have 15 calendar days from the date of receiving the RFP in which to return comments. Responses to CDOT's comments will be provided by SUBRECIPIENT within 15 calendar days of receipt of the comments. SUBRECIPIENT shall notify CDOT in writing before executing any Agreement for consultant Services which utilizes Grant funding.

**D. Statement of Work and Budget Amendment**

SUBRECIPIENT shall amend Exhibit A in accordance with the terms of this Agreement, when:

- 1.) Reallocating funds between budget line items in Exhibit A, as permitted pursuant to §5(E); and
- 2.) Adding or deleting activities listed in Exhibit A to reflect authorized budget line item reallocations permitted pursuant to §5(E).

If any changes to Exhibit A (i) require an increase or decrease to the maximum amount of this Subaward, (ii) change the term of the Agreement, or (iii) exceed the 24.99% threshold in §5(E) for any activity, the Parties must amend this Agreement prior to such change being effective.

**E. Limited Availability of Funds**

The amount of Federal Funds available to pay for the Work performed by Subrecipient in any one year is limited to the amount of the unused portion of the allocated funds, made available through 23 USC 104 (b)(3) and (f) as amended, and 49 USC 5303 as amended.

**F. Additional Funds Use**

Federal Funds shall be used only to reimburse Subrecipient for eligible allowable costs incurred and Subrecipient shall be solely responsible for all costs incurred that are either not allowable or which exceed the funds available in the Agreement as identified herein and/or in the Exhibit A.

**G. Billing, Reimbursement, and Allowable Costs****1.) Reimbursement**

The Parties hereto expressly recognize that the Subrecipient is to be paid, reimbursed, or otherwise compensated with the funds provided to CDOT by the U.S. Department of Transportation for the purpose of completing the Work and therefore, the Subrecipient expressly understands and agrees that all its rights, demands, and claims to compensation arising under this Agreement are contingent upon receipt of such funds by CDOT.

**2.) Allowable Costs**

CDOT shall not be obligated to use State funds under this Agreement. CDOT's use of Federal Funds shall be to reimburse Subrecipient for allowable costs incurred by Subrecipient, as defined in this Agreement. Subrecipient shall be solely responsible for all costs incurred which are not allowable or which exceed the funds available in the Agreement.

**H. Allowable and Indirect Costs**

Allowable and indirect costs may include but are not limited to those listed in 2 CFR 200, or State Fiscal Rule 2-7: "Official Functions and Training Functions," whichever may apply. However, such costs shall be limited to those costs determined by the CDOT as necessary to directly carry out the Work for this Agreement. In determining the amount of allowable costs, CDOT will exclude:

- a) Any costs incurred by the Subrecipient before the execution of the Agreement.
- b) Any costs incurred by the Subrecipient that are not included in **Exhibit A**.
- c) Any cost incurred by the Subrecipient after the termination date of this Agreement as amended.
- d) Memberships, subscriptions, and professional activities, which do not meet the following requirements:
  - (1). Costs of membership in civic and community, social organizations are allowable as a direct cost with the approval of the federal-awarding agency;
  - (2). Costs of subscriptions to business, professional, and technical periodicals;
  - (3). Costs of meetings, conferences, and conventions where the primary purpose is the dissemination of technical information, including meals, transportation, rental of meeting facilities, and other incidental costs; or
  - (4). Costs of memberships in business, technical, and professional organizations. However, costs of membership in organizations substantially engaged in lobbying are not allowed and thus unallowable.
- e) Official Function Expenditures (as defined by Rule 2-7 of the Colorado State Fiscal Rules), which do not qualify as a meeting, conference, meal or other function that is hosted by the MPO or Subrecipient staff and attended by guests and/or other MPO or Subrecipient personnel and held for official MPO or Subrecipient business. Expenditures incurred for official functions shall be approved by the responsible MPO or Subrecipient official.

**I. Disallow Costs**

CDOT has the right to disallow any costs incurred by the Subrecipient, which are not consistent with this Agreement, or on any activity not in compliance with the authorized Work.

**J. Reimbursement Waiver**

Subrecipient agrees that reimbursement of any cost under this Agreement does not constitute a final CDOT decision about the allowability of the costs and does not constitute a waiver of any violation by Subrecipient of the terms of this Agreement.

**K. Certification**

Upon submitting request for reimbursement, the designated representative of the Subrecipient has certified that:

- a) The costs are allowable, and therefore reimbursable;
- b) The expenditure amount for that time period is correct;
- c) The agreed upon Work has been performed and/or Work Product has been produced;
- d) All Requests for Proposals and/or Requests for Qualifications have been forwarded to CDOT for review and comment; and
- e) Reimbursements are being requested in accordance with the terms of this Agreement.

**L. Expenditures**

Along with the form requesting reimbursement, the Subrecipient shall include expenditures of Federal Funds for Work. The information shall contain:

- i. Budgeted amount;
- ii. Expenditures for current billing cycle and year-to-date;
- iii. Unexpended balance after current cycle;
- iv. Percent expended year-to-date; and
- v. Copies of Subcontractors invoices, if applicable.

**M. Invoice**

CDOT shall pay the Subrecipient's voucher for expenditures incurred in performance of Work, up to the maximum amount described in §7, and elsewhere in this Agreement, subject to conditions specified herein, within 30 days of receipt.

**N. Final Report**

Within 30 days after the end of the Program period, SUBRECIPIENT will provide to CDOT a final accomplishment report of the activities performed under this Agreement for the completed fiscal year. It shall include, but not be limited to:

- 1.) Final accomplishments by activities; and
- 2.) Status of uncompleted products; and
- 3.) Accomplishment of performance measures; and
- 4.) Actual expenditures for the Program Period.

**O. Reporting Guidance**

Reporting made for the purpose of this Agreement and its activities shall be done in accordance with 23 CFR Part 420.117, 450 and 2 CFR 200, and any supporting sections or amendments. The provisions of this paragraph do not constitute a waiver of legal and administrative appeals available to SUBRECIPIENT or the State.

**P. Monitoring**

In accordance with 2 CFR 200 and other applicable standards, the State will monitor all the activities conducted by SUBRECIPIENT pursuant to the terms of this Agreement to assure that the Project is being performed consistent with supporting federal laws and regulations, as amended, to enable the preparation and submission of appropriate reports that will contain at a minimum:

- 1.) Comparison of actual performance with established goals during the program and once the program is complete;
- 2.) Progress in meeting schedules;
- 3.) Comparison of budgeted (approved) amounts and actual costs incurred;
- 4.) Cost variances to budget;
- 5.) Approved program revisions; and
- 6.) Other supporting data.

**Q. Performance, Progress, Personnel, and Funds**

In responding to these requirements, CDOT will utilize the following steps and procedures to ensure that assigned responsibilities are carried out:

**1.) Monitoring Documents**

CDOT will use the current Statement of Work, and supporting documents, in reviewing the progress being made by SUBRECIPIENT to meet the commitments in this Agreement. The Statement of Work must include all activities, deliverables, and performance measures, and Budgets committed to by SUBRECIPIENT.

**2.) Monitoring Meetings**

Meetings between CDOT and SUBRECIPIENT representatives will be conducted at CDOT's discretion for the purpose of reviewing progress, resource allocations, and billings.

**3.) Progress and Financial Reports**

CDOT will prepare and submit progress and financial reports to the appropriate federal agencies.

**R. Noncompliance**

Any Product that SUBRECIPIENT has committed to in the Statement of Work not produced and justification not provided in a timely manner in accordance with this agreement, may result in the delay of payment of funds and/or termination as provided under this Agreement. Along with the terms of this Agreement and in accordance with 2 CFR 200, the following steps will be implemented by CDOT:

- 1.) CDOT representative will meet with SUBRECIPIENT representative to discuss performance.
- 2.) The CDOT representative will report the progress to the Division of Transportation Development Director.
- 3.) The Director will issue a decision as to whether performance is satisfactory or unsatisfactory. If performance was determined to have been unsatisfactory, CDOT shall determine if a reduction in allocation is appropriate. SUBRECIPIENT will be notified of any decisions made by CDOT.

**S. Additional Requirements for Rights in Data, Documents, and Computer Software**

Whenever possible, published material shall acknowledge the financial participation of CDOT and/or the FHWA and other agencies contributing funding to the Work Product. Any published material acknowledging the contribution of the FHWA shall include the federal disclaimer statement: "FUNDED BY THE FHWA". Published materials include any non-internal documents, reports, maps, photographs, computer software, or like materials that are intended to be viewed by those outside of CDOT, and Subrecipient.

**Patents:** In addition to the standard patent rights clauses of 37 CFR §401 et. al, and other applicable laws and regulations, CDOT, Subrecipient, and either party's subrecipients are subject to the provisions of 37 CFR part 401, governing patents and inventions whereby "The Subcontractor or Subrecipient will retain all rights provided for the State in this clause, and the State will not, as part of the consideration for awarding the subaward or Agreement, obtain rights in the Subcontractor's or Subrecipient's subject inventions."

**T. 2 CFR 200 Subpart F**

In accordance with the provisions of 2 CFR 200: "Audits of States, Local Governments, and Nonprofit Organizations", all nonfederal entities including state and local government and non-profit organizations, receiving more than \$750,000 from all federal financial assistance funding sources, shall comply with the audit requirements of 2 CFR 200. Compliance with 2 CFR 200 is required in the following manner:

- a) If the Subcontractor expends less than \$750,000 in Federal funds (all federal sources, not just Highway funds) in its fiscal year then this requirement does not apply.
- b) If the Subcontractor expends more than \$750,000 in Federal funds, but only received federal Highway funds (Catalog of Federal Domestic Assistance, CFDA 20.205) then a program specific audit shall be performed. This audit will examine the "financial" procedures and processes for this program area.
- c) If the Subcontractor expends more than \$750,000 in federal funds, and the federal funds are from multiple sources (FTA, HUD, NPS, etc.) then the Single Audit Act applies, which is an audit on the entire organization/entity.
- d) Single Audit can only be conducted by an independent auditor in accordance with generally accepted government auditing standards covering financial audits (2 CFR 200). An audit is an allowable direct or indirect cost.

**U. Final Audit Report**

If an audit is performed on Subrecipient's records for any fiscal year covering a portion of the term of this Agreement, Subrecipient shall submit a copy of the final audit report to CDOT or its principal representative at the address specified herein.

## EXHIBIT E, TITLE VI - CIVIL RIGHTS

### **Nondiscrimination Requirements**

Subrecipient shall not exclude from participation in, deny the benefits of, or subject to discrimination any person in the United States on the ground of race, color, national origin, sex, age or disability.

Subrecipient shall abide by all applicable federal and state nondiscrimination laws and regulations, including but not limited to, Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.; The Civil Rights Restoration Act of 1987, Pub. L. No. 100-259, 102 Stat. 28; 49 CFR Part 21: Nondiscrimination in Federally-Assisted Programs of the Department of Transportation; 23 CFR Part 200: Title VI Program and Related Statutes - Implementation and Review Procedures; Title II of the Americans with Disabilities Act of 1990, 42 U.S.C §§12101 - 12213; Rehabilitation Act of 1973 § 504, 29 U.S.C § 794; 49 CFR Part 27: Nondiscrimination on the Basis of Disability in Programs or Activities Receiving Federal Assistance; 28 CFR Part 35: Nondiscrimination on the Basis of Disability in State and Local Government Services; 49 CFR Part 28: Enforcement of Nondiscrimination on the Basis of Handicap in Programs or Activities Conducted by the Department of Transportation.

As a condition of federal financial assistance, Subrecipient shall develop and maintain a Title VI Program in accordance with the "Requirements for FHWA Subrecipients" set forth in CDOT's Title VI Program Plan. Subrecipient shall also facilitate compliance with Executive Order 12898 and DOT Order 5610.2(a) by incorporating the principles of environmental justice in planning, project development and public outreach in accordance with applicable CDOT and FHWA guidance.

In any contract utilizing federal funds, land, or other federal aid, Subrecipient shall require the federal-aid recipient or contractor to provide a statement of written assurance that they will comply with Section 504 and not discriminate on the basis of disability. Subrecipient shall develop and maintain an ADA Program in accordance with 28 CFR Part 35, Nondiscrimination on the Basis of Disability in State and Local Government Services and any other requirements established by CDOT for FHWA subrecipients.

### **Disadvantaged Business Enterprise Requirements**

The requirements of 49 CFR Part 26 and CDOT's DOT-approved DBE program are incorporated by reference into this agreement. Subrecipient shall not discriminate on the basis of race, color, national origin, or sex in the performance of this Agreement. Subrecipient shall carry out applicable requirements of 49 CFR Part 26 in the award and administration of this DOT-assisted Agreement. Failure by Subrecipient to carry out these requirements is a material breach of this Agreement, which may result in the termination of this Agreement or such other remedy as CDOT deems appropriate. Subrecipient must include this assurance in all DOT-assisted contracts.

### **Prompt Payment**

Subrecipient shall require that all contractors pay subcontractors for satisfactory performance of work no later than 30 days after the receipt of payment for that work from the contractor. If Subrecipient allows contractors to withhold retainage from subcontractors, retainage shall be released within 30 days from the date the work is satisfactorily completed.

A RESOLUTION ADOPTING THE UNIFIED PLANNING WORK PROGRAM (UPWP) FOR FEDERAL FISCAL YEARS (FFY) 2026 AND 2027 FOR THE PUEBLO AREA COUNCIL OF GOVERNMENTS (PACOG) AS THE DESIGNATED METROPOLITAN PLANNING ORGANIZATION (MPO) FOR THE PUEBLO URBAN AREA IN COMPLIANCE WITH 23 USC 134, 49 USC 5303, 23 CFR 450 AND 500, AND 49 CFR 613; AND AUTHORIZING AND DIRECTING THE CITY OF PUEBLO IN ACCORDANCE WITH THE PACOG AND CITY OF PUEBLO DELEGATION AGREEMENT DATED DECEMBER 12, 2024 TO ADMINISTER AND IMPLEMENT THIS UPWP IN ACCORDANCE WITH ALL APPLICABLE FEDERAL, STATE, AND LOCAL LAWS AND REGULATIONS

WHEREAS, the Pueblo Area Council of Governments (PACOG) is the recognized Metropolitan Planning Organization (MPO) for the Pueblo area as designated by the Governor of Colorado in accordance with 23 U.S.C. 134(b); and

WHEREAS, PACOG has developed an annual Unified Planning Work Program (UPWP) and budgets for the Federal Fiscal Years (FFY) 2026 and 2027 in compliance with the requirements of 23 USC 134, 49 USC 5303, 23 CFR 450 and 500, and 49 CFR 613 Act; and

WHEREAS, the FFY 2026-2027 UPWP was developed through local collaboration with comments and recommendations from the state and federal funding agencies; and

WHEREAS, the UPWP reflects the priorities, scope of work, and level of effort required for all of the agencies responsible for regional transportation planning for FFY 2026-2027.

NOW, THEREFORE, BE IT RESOLVED BY THE PUEBLO AREA COUNCIL OF GOVERNMENTS that:

SECTION 1:

The PACOG Unified Planning Work Program for Fiscal Year 2026-2027 is hereby approved and adopted.

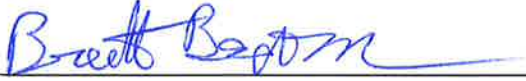
SECTION 2:

The PACOG Board hereby authorizes and directs the City of Pueblo in accordance with the PACOG and City of Pueblo Delegation Agreement dated December 12<sup>th</sup>, 2024 to administer and implement this UPWP in accordance with all applicable federal, state, and local laws and regulations.

SECTION 3:

This resolution shall become effective immediately upon passage and approval.

PASSED AND ADOPTED this 28<sup>th</sup> day of August 2025 by the PACOG Board.

A handwritten signature in blue ink, appearing to read "Brett Babin", written over a horizontal line.

Chairperson, Pueblo Area Council of Governments

ATTEST:

A handwritten signature in blue ink, appearing to read "Wendy Peller", written over a horizontal line.

PACOG Recording Secretary

**DELEGATION AGREEMENT FOR TRANSPORTATION PLANNING AND  
IMPROVEMENT SERVICES FOR 2026 CALENDAR YEAR**

THIS DELEGATION AGREEMENT FOR TRANSPORTATION PLANNING AND IMPROVEMENT SERVICES (“**Agreement**”) is made and entered into effective the 1st day of January 2026, by and between the Pueblo Area Council of Governments (“**PACOG**”), the City of Pueblo, a Colorado municipal corporation, (“**City**”) (individually “**Party**” and collectively “**Parties**”).

**WITNESSETH:**

**WHEREAS**, PACOG serves as the Metropolitan Planning Organization (“**MPO**”) for the Pueblo Urban Area, and the Transportation Planning Region (“**TPR**”) for all of Pueblo County, Colorado;

**WHEREAS**, PACOG is eligible to receive funds to perform the work tasks for these activities and has entered one or more agreements with the State of Colorado and/or the U.S. Department of Transportation for transportation planning and improvement projects whereby funding may be made available to PACOG under provisions of said agreements, and statutes, laws and regulations referenced in said agreements;

**WHEREAS**, City has the authority, capacity, and ability to undertake such transportation planning and improvement projects; and

**WHEREAS**, PACOG desires to contract with City to provide services, activities, and project execution required of PACOG under the aforesaid agreements through the City of Pueblo Urban Transportation Planning Division (“**UTPD**”), and others.

**NOW, THEREFORE**, in consideration of the foregoing recitals and the terms and conditions set forth herein, the parties hereto do mutually agree as follows:

**1. WORK TASKS; RESPONSIBILITIES OF CITY**

(a) City agrees to satisfactorily perform and complete, using its own employees, employees of Pueblo County (“**County**”) or such consultants or contractors selected by PACOG in accordance with the regulations and policies of the Colorado Department of Transportation (“**CDOT**”) and the Federal Highway Administration (“**FHWA**”), the planning services and items of work, and furnish all labor and materials encompassed within or reasonably necessary to accomplish the tasks and functions described in the Federal Fiscal Years (FFY) 2026-2027 Unified Planning Work Program adopted by PACOG Resolution 25-019 August 28, 2025, incorporated herein by reference, in full compliance with all provisions of this Agreement.

(b) City is authorized to have pre-approved staff from County work mutually with City staff, and consultants to complete work for services, activities, and project execution required of PACOG as identified in the Scope of Work included as Appendix A attached hereto

and incorporated herein by this reference.

City represents that it: (I) has the requisite authority and capacity to perform the services and work contemplated in the FFY 2026-2027 UPWP, as approved, and; (ii) that it is a home rule city and political subdivision of the State of Colorado; (iii) that it is fully aware of and understand its duty to perform all functions and services in accordance with the regulatory requirements set forth in 23 C.F.R. Parts 420 and 450 and 49 C.F.R. Part 18 and those identified in the Memorandum of Agreement (“MOA”) adopted by PACOG on October 26, 2023, and incorporated herein by reference, in full compliance with all the provisions of this Agreement.

## **2. RESPONSIBILITIES OF PACOG**

PACOG shall designate a representative who will be authorized to make all necessary decisions required of PACOG on behalf of PACOG in connection with the performance of this Agreement and the disbursement of funds in connection with the program. In the absence of such a designation, the Mayor of the City and the County’s Attorney, acting jointly, shall be deemed as PACOG’s authorized representative.

## **3. CITY’S COMPENSATION AND METHOD OF PAYMENT**

(a) PACOG will pay to City, an amount up to that specified in subparagraph (d) of this paragraph as full compensation for all services and work to be performed or undertaken by City under this Agreement, which is within the FFY 2026-2027 UPWP, as approved. Payment of funds to City are subject to the following requirements, which shall be conditions precedent to payment: (I) that City staff time has been expended for eligible activities or City has obligated or expended funds for eligible approved expenditures, (ii) that City is not in default of any material provisions of this Agreement nor applicable law or regulation, (iii) that City has submitted requests for payment or reimbursement detailing the eligible payment or reimbursement items, (iv) that, if required by the terms or conditions of an applicable financial assistance agreement, City has certified with each payment or reimbursement request compliance with the requirements identified in the MOA and that all staff time and obligations or expenditures for which payment is sought were made for and in furtherance of an approved project or work and are an eligible use of assistance under the law and regulations applicable to such assistance, and (v) that PACOG has timely received from CDOT and local agency matches sufficient funds to make the payment or reimbursement hereunder.

(b) Payment hereunder is also subject to and may only be disbursed in accordance with applicable regulations including but not limited to those contained in the MOA and those set forth in 49 C.F.R. Part 18, as presently promulgated and as same may be revised from time to time in the future, all other terms of this Agreement, and any special provisions in the FFY 2026-2027 UPWP.

(c) Expenses for pre-approved County staff time and other eligible reimbursable expenses shall be paid to the County following the submittal and approval of invoices detailing the eligible reimbursement items.

(d) PACOG shall pay to City for services covered by the FFY 2026-2027 UPWP, as approved a sum not to exceed the amounts identified in the FFY 2025 PACOG budget (\$861,957) and/or rates set forth in those documents as incorporated herein by reference and as may be amended in writing, in full compliance with all the provisions of this Agreement.

In the event PACOG requests or authorizes work beyond or in addition to that set forth in the FFY 2026-2027 UPWP, as approved, PACOG shall pay additional compensation to the City. The amount of such additional compensation shall be negotiated, but in the event the parties fail to negotiate or are unable to agree regarding compensation, City shall be compensated for staff time and its costs at the rates set forth in paragraph (d) above, and for the work of subcontractors and consultants in an amount equal to the reasonable actual cost to City.

#### **4. TERM OF AGREEMENT.**

The term of this Agreement shall be from January 1, 2026, to December 31, 2026, unless sooner terminated as herein provided.

#### **5. TERMINATION OF AGREEMENT.**

(a) For Cause. This Agreement may be terminated by PACOG for cause, including any nonperformance by City, upon thirty (30) days written notice to City including a statement of the reasons therefore, and after an opportunity for a hearing has been afforded. If a hearing is requested, it shall be held before the PACOG's governing body at a regular or special meeting of same whose decision shall be final. The determination of the PACOG as to the cause of termination and the appropriateness thereof shall be final and binding upon both PACOG and the City. Cause for termination shall mean any material failure by City to comply with any term of this Agreement.

(b) For Convenience. This Agreement may be terminated for convenience in accordance with the provisions of 49 C.F.R. § 18.44. This Agreement shall automatically terminate at the end of its term as well as in the event of any suspension, reduction, or non-receipt of the financial assistance or State or Federal grant funds by PACOG.

(c) Post Termination Procedures. In the event of termination, City shall cease further work and City shall be entitled to receive just and equitable compensation for satisfactory work performed through the date of termination for which compensation has not previously been paid nor reimbursement made.

#### **6. ASSIGNABILITY.**

This Agreement shall not be assigned or transferred by either party without the prior written consent of the other party. Any assignment or attempted assignment made in violation of this provision shall, at the non-assigning party's election, be deemed void and of no effect whatsoever.

#### **7. CONFLICT OF INTEREST.**

City certifies that neither it nor any members of its City Council, officers, or employees has or will derive any personal or financial interest or benefit from the activity or activities assisted pursuant to this Agreement, nor has an interest in any contract, subcontract or agreement with respect thereto, nor the proceeds thereunder, either for themselves or for those with whom they have family or business ties, during their tenure and for one year thereafter. City shall avoid all conflicts of interest which are prohibited by applicable federal regulations, if any, including but not limited to those set forth in 49 C.F.R. § 18.36(b)(3) as presently promulgated and as same may be revised from time to time in the future.

**8. CITY RECORDS.**

City shall maintain records as to services provided, reimbursable expenses incurred in performing the Work Tasks, and complete accounting records. Accounting records shall be kept on a generally recognized accounting basis and as requested by PACOG's auditor and acceptable to CDOT and FHWA. City agrees to comply with all applicable uniform administrative requirements described or referenced in applicable state or federal regulations, including those set forth in the MOA as a part of this Agreement. PACOG, CDOT, the Comptroller General of the United States, the Inspector General of the U.S. Department of Transportation, and any of their authorized representatives, shall have the right to inspect and copy, during reasonable business hours, all books, documents, papers, electronic media, and records of City which relate to this Agreement for the purpose of making an audit or examination. Upon completion of the work and end of the term of this Agreement, the PACOG may require that a copy of all of City's financial records relating to this Agreement to be turned over to PACOG.

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**9. MONITORING AND EVALUATION.**

PACOG shall have the right to monitor and evaluate the progress and performance of City to assure that the terms of this Agreement are being satisfactorily fulfilled in accordance with CDOT's, FHWA's, FTA's, PACOG's and other applicable monitoring and evaluation criteria and standards. PACOG may quarterly review City performance using on-site visits, progress reports required to be submitted by City, audit findings, disbursement transactions and contact with City as necessary. If requested, the City shall furnish to the PACOG periodic but not less frequently than quarterly program and financial reports of its activities in such form and manner as may be requested by the PACOG. City shall fully cooperate with PACOG relating to such monitoring and evaluation.

**10. CITY FILES AND INFORMATION REPORTS.**

City shall maintain files, including electronic media, containing information which shall

clearly document all activities performed in conjunction with this Agreement, including, but not limited to, financial transactions, conformance with assurances, activity reports, and program income, if any. These records shall be retained by City for a period of three (3) years after the completion of the Work Tasks.

**11. INDEPENDENCE OF CITY.**

Nothing herein contained nor the relationship of the Parties, which relationship is expressly declared to be that of an independent contractor, shall make or be construed to make City or any of City's agents or employees the agents or employees of the PACOG. City shall be solely and entirely responsible for its acts and the acts of its agents, employees and subcontractors.

**12. LIABILITY: INSURANCE.**

As to PACOG, City agrees to assume the risk of all personal injury, including death and bodily injury, and damage to and destruction of property, including the loss of use therefrom, caused by or sustained, in whole or in part, in conjunction with or arising out of the performance or nonperformance of this Agreement by City or by the conditions created thereby; provided, however, that nothing in this paragraph is intended, nor should it be construed, to create or extend any right, claims or benefits or assume any liability for or on behalf of any third party, or to waive any immunities or limitations otherwise conferred under of by virtue of federal or state law, including but not limited to the Colorado Governmental Immunity Act, C.R.S. § 24-10-101 et seq., City shall provide insurance on its employees complying with the requirements of State law.

**13. SPECIAL REQUIREMENTS APPLICABLE TO IMPROVEMENTS TO PROPERTY.**

(a) In addition to all procurement requirements otherwise applicable to City pursuant to any other provision of this Agreement or pursuant to any Requirement of law or regulation incorporated in this Agreement by reference, if any portion of the funds provided to City under this Agreement are to be used for making improvements to real property, including new construction, rehabilitation, or remodeling, then in such event City shall comply with all requirements of this Paragraph 13.

(b) No improvements shall be undertaken to real property with funds (or reimbursement) provided hereunder unless and until: (I) plans and specifications therefore have been prepared by either a registered Professional Engineer in good standing and duly licensed to practice in the State of Colorado or an Architect duly licensed and authorized to conduct a practice of architecture in the State of Colorado; and (ii) all construction contracts for improvements for which payment is sought from PACOG shall have been awarded only after an open, competitive bidding process which allows qualified contractors to reasonably participate.

(c) If this Paragraph 13 is applicable, no disbursement of funds to City shall be made by PACOG hereunder unless and until all conditions precedent to payment specified elsewhere in this Agreement have been satisfied and City files with PACOG's designated representative a written request for payment signed by an architect, engineer, or an officer of City that certifies (I) that the amounts included in the request for payment have not been included in any prior request for payment, and (ii) that the improvements listed therein for which payment is sought have been completed in accordance with the approved plans and specifications therefor.

(d) In every contract for construction of improvements for which payment or reimbursement from PACOG is to be provided under this Agreement, City shall include a contract clause or clauses, requiring the contractor, and all of the contractor's subcontracts of all tiers, to comply with the applicable requirements of the Davis-Bacon Act and implementing regulations, and to pay all laborers and mechanics engaged in work upon the improvements at the prevailing wage rates for such work as determined by the U.S. Department of Labor.

**14. EQUAL EMPLOYMENT OPPORTUNITY.**

In connection with the performance of this Agreement, City shall comply with the provisions of Title VI of the Civil Rights Act of 1964 and the Title VI assurance executed by PACOG and the State of Colorado under 23 U.S.C. § 324 and 29 U.S.C. § 794 and the provisions of the Americans with Disabilities Act of 1990 (Pub. L. 101-336, 104 Stat. 327, as amended) and the U.S. DOT implementing regulations (49 C.F.R. § 27.37 and .38) as certified in the FY 2026-2027 UPWP.

**15. ENTIRE AGREEMENT; AMENDMENTS.**

The provisions set forth in this Agreement, and all documents as incorporated herein by reference, in full compliance with all the provisions of this Agreement, constitute the entire and complete agreement of the parties hereto and supersede all prior written and oral agreements, understandings or representations related thereto. No amendment or modification of this Agreement, and no waiver of any provision of this Agreement, shall be binding unless made in writing and executed by the duly authorized officers of the Parties.

**16. SIGNATURES.**

The persons signing this Agreement on behalf of each party represent and warrant that such persons and their respective party have the requisite power and authority to enter, execute and deliver this Agreement and this Agreement is a valid and legally binding obligation of such party enforceable against it in accordance with its terms.

[SIGNATURE PAGE AND APPENDIXES FOLLOWS]

IN WITNESS, WHEREOF, CITY Parties have executed this Agreement effective as of the date first above written and under the laws of the State of Colorado.

**ATTEST:**

**PUEBLO AREA COUNCIL OF GOVERNMENTS**

By Wendy Delgado  
Secretary

By Bob Beaman  
Chairperson

**ATTEST:**

**CITY OF PUEBLO**

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

By \_\_\_\_\_  
Mayor, Heather Graham

**APPROVED AS TO FORM:**

Department of Law, City of Pueblo:

By \_\_\_\_\_  
City Attorney

## **APPENDIX A**

### **SCOPE OF WORK**

CITY is authorized to pre-approved staff from COUNTY to work mutually with CITY staff, and consultants to complete work for transportation planning services, activities, and project execution required of PACOG for planning services and items of work including all labor and materials encompassed within or reasonably necessary to accomplish the assigned tasks and functions described in the FY 2026-2027 Unified Planning Work Program adopted by PACOG Resolution 25-019 on August 28,2025.

### **PROFESSIONAL FEE SCHEDULE**

CITY shall compensate the COUNTY for the Scope of Services, approved by CITY, in accordance with paragraph 3.C. above, in the following manner:

1. An hourly fee comprised of the employee's hourly rate and benefits, excluding administrative and overhead charges, for the completion of approved work documented and approved from invoices submitted by COUNTY.
2. Reimbursement of qualifying additional expenses authorized for the satisfactory performance and completion, of the planning services and items of work in accordance with the regulations and policies of the Colorado Department of Transportation (CDOT) and the Federal Highway Administration (FHWA), encompassed within or reasonably necessary to accomplish the tasks and functions described in the FY 2026-2027 UPWP, as adopted by PACOG Resolution 25-019 on August 28,2025.
3. The Scope of Work for COUNTY staff that is subject to approval by CITY shall be specifically for eligible transportation planning activities that include work tasks the following tasks identified in the FY 2026-2027 UPWP:
  - i) Initiate discussions with MPO stakeholders regarding the creation of a Pueblo Regional Transportation Authority {RTA) or other dedicated funding sources for transportation.
  - ii) Integrating transit, bicycle and pedestrian planning into all transportation planning efforts.
  - iii) Review proposed major county subdivision proposals, zoning changes, site plans, planned developments and land use issues for impacts to the transportation system and require

amendment of the PACOG Long Range Transportation Plan.

iv) Assist PACOG members by providing information and other assistance with transportation

- v) Participate in professional training and conferences via teleconferencing, e-mail discussion lists, and webinars.
- vi) Attend FHWA/FTA training programs and other transportation conferences for technical or professional training.
- vii) Meet with FHWA and CDOT monthly for MPO updates and discussion
- viii) Assist in providing accurate and current information for the PACOG MPO/TPR website.
- ix) Prepare demographic data as needed for transportation modeling used for special studies and/or project consultants.
- x) Analyze and document current and updated traffic count data for the Pueblo area.
- xi) Analyze and document current and updated collision data for trends and recommended solutions to reduce crash rates.
- xii) Review transit system expansion and route service in planning projects and sub-area studies.
- xiii) Obtain, update, convert, refine, and maintain surface roadway systems data for the Pueblo area. This includes national highway system, state highway system, county and local roadways.
- xiv) Obtain, update, convert, refine, and maintain transit systems data for the Pueblo area. This includes updating of route and stop location changes.
- xv) Utilize the PACOG Travel Demand Model program to run scenarios involving roadway improvements and construction on new transportation routes to evaluate costs and benefits.