

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 1 - Geographic Priority Areas

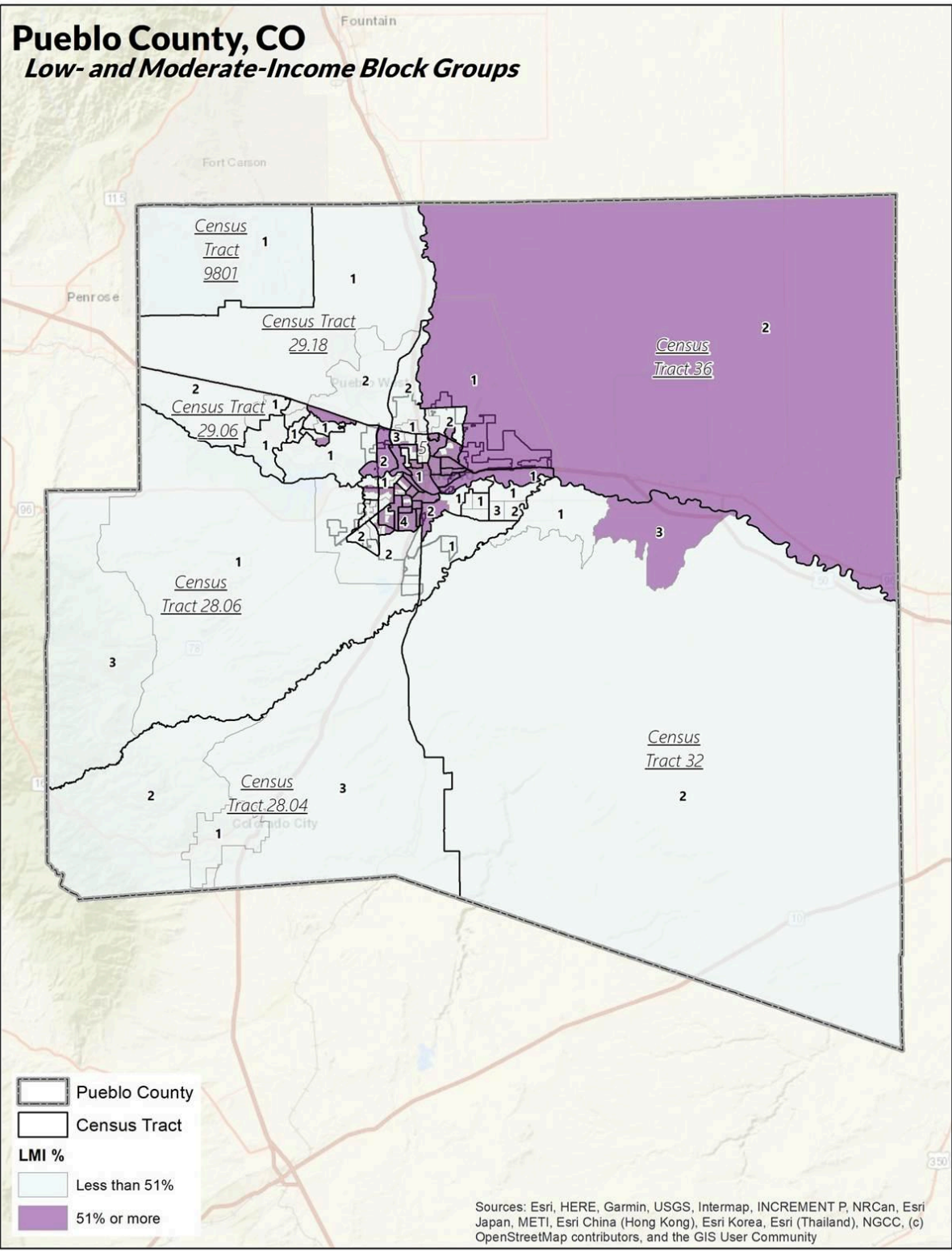
1	Area Name:	Citywide
	Area Type:	Other
	Other Target Area Description:	Other
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	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

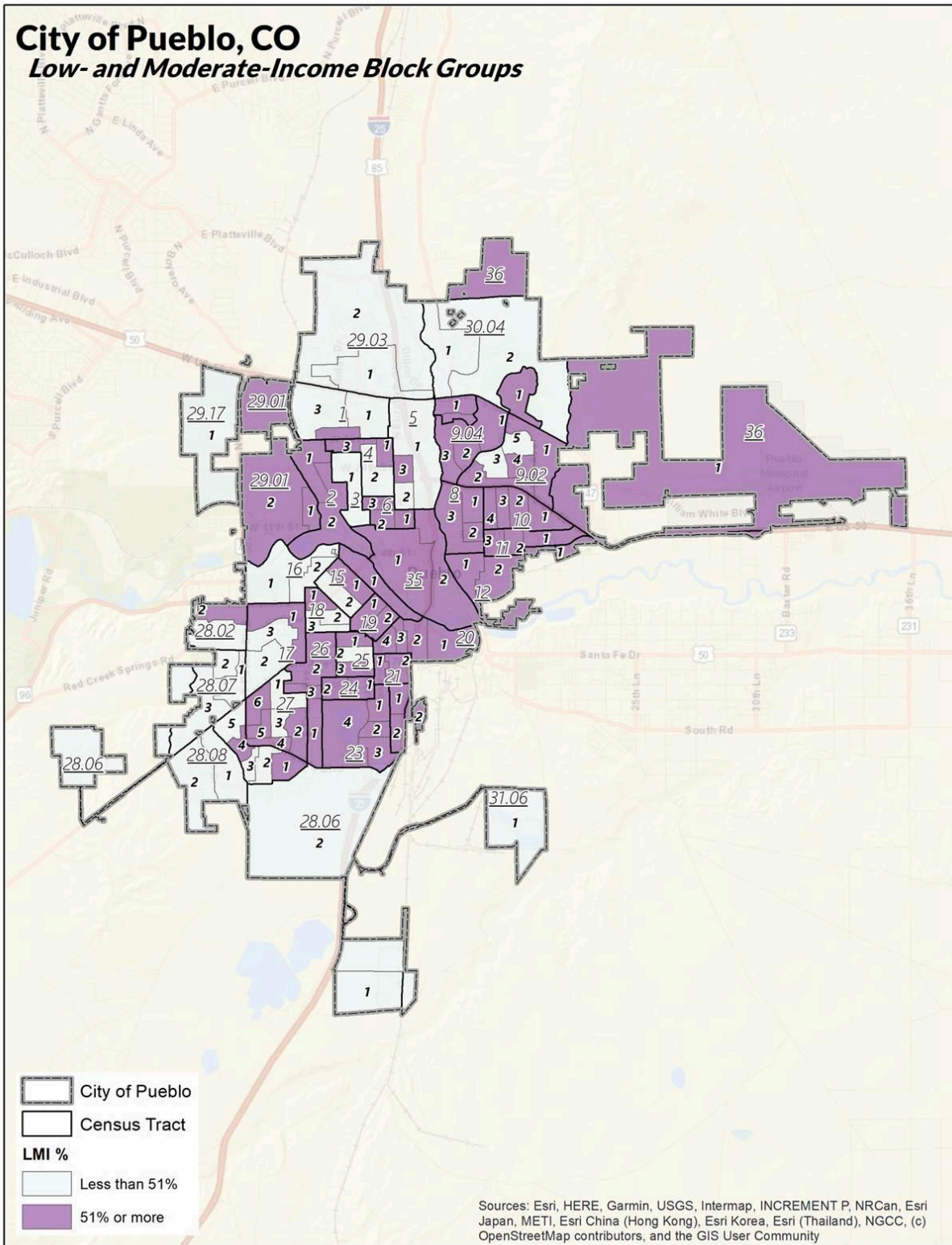
There are no specially identified target areas for allocating CDBG and HOME resources. CDBG funds will be expended within the City of Pueblo while HOME funds will be used in citywide as well as in the County. HOME funds are divided between the City and County. City HOME funds are spent within the City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

City of Pueblo, CO

Low- and Moderate-Income Block Groups



LMI Map 2

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

Priority Needs

Table 2 – Priority Needs Summary

1	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	<p>Extremely Low</p> <p>Low</p> <p>Moderate</p> <p>Middle</p> <p>Large Families</p> <p>Families with Children</p> <p>Elderly</p> <p>Public Housing Residents</p> <p>Chronic Homelessness</p> <p>Individuals</p> <p>Families with Children</p> <p>Mentally Ill</p> <p>Chronic Substance Abuse</p> <p>veterans</p> <p>Persons with HIV/AIDS</p> <p>Victims of Domestic Violence</p> <p>Unaccompanied Youth</p> <p>Elderly</p> <p>Frail Elderly</p> <p>Persons with Mental Disabilities</p> <p>Persons with Physical Disabilities</p> <p>Persons with Developmental Disabilities</p> <p>Persons with Alcohol or Other Addictions</p> <p>Persons with HIV/AIDS and their Families</p> <p>Victims of Domestic Violence</p>

	Geographic Areas Affected	Other
	Associated Goals	Acquisition and rehabilitation of housing Financial assistance to renters and owners New construction of affordable housing Preserve existing affordable units (rehab)
	Description	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.
	Basis for Relative Priority	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	Priority Need Name	Public Services including Services for Homeless
	Priority Level	High

Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
Geographic Areas Affected	Other
Associated Goals	Provide housing and services to homeless/ near Provide public services to non-homeless population

	Description	<p>Housing and services for homeless and near homeless include outreach, emergency, transitional and permanent supportive housing, Rapid Re-Housing, supporting services and rental assistance</p> <p>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.</p>
	Basis for Relative Priority	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	Priority Need Name	Public Infrastructure and Facilities
	Priority Level	High
	Population	<p>Extremely Low</p> <p>Low</p> <p>Moderate</p> <p>Elderly</p> <p>Frail Elderly</p> <p>Persons with Mental Disabilities</p> <p>Persons with Physical Disabilities</p> <p>Non-housing Community Development</p>
	Geographic Areas Affected	Other
	Associated Goals	Improve and maintain public infrastructure and fac

	Description	Public facilities include neighborhood facilities, parks/recreation facilities, parking facilities, senior and youth facilities, childcare facilities, job training facilities, cultural facilities, non-residential historic preservation, and homeless facilities. Public infrastructure includes: street and sidewalk improvements including lighting and streetscaping, water and sewer improvements, flood drainage improvements, solid waste management improvements.
	Basis for Relative Priority	Based on physical inspection and interviews conducted during consultation process, existing public facilities and infrastructure needs upgrading and expansion.
4	Priority Need Name	Economic Development and Community Revitalization
	Priority Level	High
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	Other
	Associated Goals	Economic development Eliminate slum and blighting influences
	Description	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.
	Basis for Relative Priority	Areas within the City need revitalization to improve the environments and to promote economic growth and activity.
5	Priority Need Name	Administration and Planning
	Priority Level	High

Population	Extremely Low Low Moderate Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
Geographic Areas Affected	Other Other
Associated Goals	Fair housing education and outreach Planning and administration of federal programs
Description	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.
Basis for Relative Priority	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
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<p>Tenant Based Rental Assistance (TBRA)</p>	<p>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.</p>
<p>TBRA for Non-Homeless Special Needs</p>	<p>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.</p>
<p>New Unit Production</p>	<p>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.</p>
<p>Rehabilitation</p>	<p>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.</p>
<p>Acquisition, including preservation</p>	<p>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.</p>

Table 3 – Influence of Market Conditions

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

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

	Base Year: 2015		Most Recent Year: 2019		% Change	
	City	County	City	County	City	County
Median Home Value	\$114,200 (\$122,998 in 2019)	\$138,600 (\$149,278 in 2019)	\$141,000	\$164,600	23.47% (14.64% adjusted)	18.76% (10.26% adjusted)
Median Contract Rent	\$577 (\$621 in 2019)	\$601 (\$647 in 2019)	\$646	\$665	11.96% (3.95% adjusted)	10.65% (2.73% adjusted)
Median Income	\$34,550 (\$37,212 in 2019)	\$41,286 (\$44,467 in 2019)	\$40,450	\$46,783	17.08% (8.70% adjusted)	13.31% (5.21% adjusted)

Source: 2011-2015 5-Year ACS, 2015-2019 5-Year ACS (B19013, B25077, B25058)

Supplemental Table 2

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.

Anticipated Resources

Program	Source of	Uses of Funds	Expected Amount Available Year 1	Expected Amount	Narrative

	Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Available Remainder of ConPlan \$	Description
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,473,674	0	369,510	1,843,184	5,894,696	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).

HOM E	publi c - fede ral	Acquisition Homebuyer assistance Homeowne r rehab Multifamily rental new constructio n Multifamily rental rehab New constructio n for ownership TBRA	839,42 2	86,09 5	0 0	925,51 7	3,357,6 88	The expected amount remainin g is four times the year 1 allocatio n assumin g that the level of funding remains the same.
Other	publi c - fede ral	Economic Developme nt Other	1,364,4 99	0 0	0 0	1,364,4 99	0 0	CARES Act funds to prepare for, prevent and respond to the pandemi c. Includes CV1 and CV3.

Table 4 - 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 Ownership Public Housing public services	Jurisdiction
POSADA, INC	Non-profit organizations	Homelessness	Jurisdiction
Catholic Charities, Diocese of Pueblo, Inc.	Non-profit organizations	Non-homeless special needs public services	Jurisdiction

Housing Authority of the City of Pueblo	PHA	Public Housing	Jurisdiction
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Table 5 - 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		
Rental Assistance	X	X	X
Utilities Assistance	X		

Street Outreach Services			
Law Enforcement		X	
Mobile Clinics			
Other Street Outreach Services	X	X	

Supportive Services			
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		
Other			
	X		

Table 6 - 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	Acquisition and rehabilitation of housing	20 20	20 24	Affordable Housing	Citywide Countywide	Affordable Housing	HOME: \$1,100,000	Homeowner Housing Rehabilitated: 3 Household Housing Unit
2	New construction of affordable housing	20 20	20 24	Affordable Housing	Citywide Countywide	Affordable Housing	HOME: \$2,200,000	Rental units constructed: 23 Household Housing Unit Homeowner Housing Added: 8 Household Housing Unit
3	Preserve existing affordable units (rehab)	20 20	20 24	Affordable Housing	Citywide Countywide	Affordable Housing	CDBG: \$500,000 HOME: \$500,000	Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: 80 Household

								Housing Unit
4	Financial assistance to renters and owners	20 20	20 24	Affordable Housing	Citywide	Affordable Housing	CDBG: \$50,000 HOME: \$450,000	Public service activities for Low/Moderate Income Housing Benefit: 15 Households Assisted Tenant-based rental assistance / Rapid Rehousing : 85 Households Assisted

5	Provide housing and services to homeless/ near	20 20	20 24	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 Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted
6	Provide public services to non-homeless population	20 20	20 24	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	20 20	20 24	Non-Housing Community Development	Citywide	Public Infrastructure and Facilities	CDBG: \$2,775, 000	Public Facility or Infrastruct ure Activities other than Low/Mod erate Income Housing Benefit: 2750 Persons Assisted
8	Economic developme nt	20 20	20 24	Non-Housing Community Developm ent	Citywide	Economic Developme nt and Community Revitalizati on	CDBG: \$300,00 0	Jobs created/re tained: 25 Jobs
10	Eliminate slum and blighting influences	20 20	20 24	Affordable Housing Non-Hous ing Communit y Developm ent	Citywide	Economic Developme nt and Community Revitalizati on	CDBG: \$1,000, 000	Buildings Demolishe d: 12 Buildings
11	Planning and administra tion of federal programs	20 20	20 24	Affordable Housing Public Housing Homeless Non-Hom eless Special Needs Non-Hous	Citywide Countyw ide	Administra tion and Planning	CDBG: \$1,375, 000 HOME: \$460,00 0 CDBG-C V: \$214,49 9	Other: 11 Other

				ing Communit y Developm ent				
12	Fair housing education and outreach	20 20	20 24	Fair Housing	Citywide	Administrat ion and Planning	CDBG: \$25,000	Other: 10 Other
13	Provide facilities/s ervices in support of the pand	20 20	20 24	Affordable Housing Public Housing Homeless Non-Hom eless Special Needs Non-Hous ing Communit y Developm ent	Citywide		CDBG-C V: \$300,00 0	Public service activities for Low/Mod erate Income Housing Benefit: 30 Household s Assisted

Table 7 – Goals Summary

Goal Descriptions

1	Goal Name	Acquisition and rehabilitation of housing
	Goal Description	Acquisition and rehabilitation of housing HOME assistance: (3) Acquisition Rehab projects assisting households below 80% AMI.
2	Goal Name	New construction of affordable housing

	Goal Description	New construction of HOME affordable rental housing units (13) Units at or below 50% AMI (10) Units at or below 60% AMI but below greater than 50% AMI HOME assisted new construction of homeowner housing on infill lots will serve eight households below 80% AMI.
3	Goal Name	Preserve existing affordable units (rehab)
	Goal Description	Rehabilitation/reconstruction of single and multi-family housing; energy efficiency improvements; accessibility modifications; lead based paint hazard testing and abatement; minor repairs; and preservation of affordable units. 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.
4	Goal Name	Financial assistance to renters and owners
	Goal Description	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. HOME TBRA will serve the following households: (40) ELI households - below 30% AMI (35) LI households - below 50% AMI (10) MI households - below 60% AMI
5	Goal Name	Provide housing and services to homeless/ near
	Goal Description	Housing and services for homeless and near homeless include outreach, emergency, transitional and permanent supportive housing, Rapid Re-Housing, supporting services and rental assistance
6	Goal Name	Provide public services to non-homeless population

	Goal Description	Other public services that are needed include: housing and services for persons with HIV/AIDS; services for persons with physical, developmental and/or intellectual disabilities; employment and workforce development; screening for lead-based paint hazards; housing counseling; neighborhood clean-up programs; crime awareness and prevention programs; transportation; health and mental health services; services for persons recovering from addiction; youth programs, food banks and other food-related services; childcare and related services; senior programs and related services; legal services; and financial literacy.
7	Goal Name	Improve and maintain public infrastructure and fac
	Goal Description	Public facilities include neighborhood facilities, parks/recreation facilities, parking facilities, senior and youth facilities, childcare facilities, job training facilities, cultural facilities, non-residential historic preservation, and homeless facilities. Public infrastructure includes: street and sidewalk improvements including lighting and streetscaping, water and sewer improvements, flood drainage improvements, solid waste management improvements.
8	Goal Name	Economic development
	Goal Description	Includes activities such as workforce and other economic development initiatives.
10	Goal Name	Eliminate slum and blighting influences
	Goal Description	Demolition of vacant and dilapidated structures that pose a threat to health and safety, code enforcement, and graffiti removal programs as well as facade improvement projects.
11	Goal Name	Planning and administration of federal programs
	Goal Description	Planning and administration is required for the successful implementation of CDBG and HOME programs.
12	Goal Name	Fair housing education and outreach
	Goal Description	Education and outreach on fair housing to affirmatively further fair housing choice.
13	Goal Name	Provide facilities/services in support of the pand
	Goal Description	Provide facilities and services to prevent, prepare and respond to the COVID-19 pandemic as well as to recovery from the pandemic.

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. The previous AI, completed in 2021, identified a lack of fair housing education; the need to designate more developable land within the city to produce more multi-family housing; a need to increase the number of residential zones that allow for multifamily housing; a need to provide technical assistance to developers looking to access public funding; and necessary revision of the zoning ordinance to loosen restrictions on type and location of housing units. All this work is either underway or completed, with zoning revisions in particular expected to impact housing in Pueblo. The zoning ordinance updates are ongoing and expected to be complete at the end of 2025.

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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.

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

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/cm² 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.

See Unique Appendix for additional information.