

# 2021

## Consolidated Annual Performance and Evaluation Report (CAPER)

### 2<sup>nd</sup> Year of 2020-2024 Consolidated Plan

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**Program Year – January 1, 2021-December 31, 2021**



## Introduction

Note: The introduction is not part of the Consolidated Annual Performance and Evaluation Report (CAPER) that is submitted to the U. S. Department of Housing and Urban Development (HUD). It is provided as extra information so that the public can have a better understanding of the intent and purpose of the document.

The Consolidated Annual Performance and Evaluation Report (CAPER) is a step in HUD's Consolidated Plan process for use of the Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) grant funds, two federal grants received by the City annually. The Consolidated Plan provides a framework for formulation of a Five-Year Strategic Plan for the City to assess affordable housing and community development needs and market conditions, identify activities to address the needs and conditions, and then target the federal funds to the identified needs. Annual Action Plans then describe activities that will implement goals identified in the Strategic Plan. The CAPER is the annual report on accomplishments and progress made toward the just-completed-year's Action Plan goals, in this report's case, 2021. This CAPER is the second report on the Strategic Plan for 2020-2024. The CDBG and HOME grants may be used as follows:

- **Community Development Block Grant:** May be used for a wide range of community development needs that are to benefit low- moderate-income residents of the City through the provision of decent, affordable housing; suitable living environments; and expansion of economic opportunities; or for clearance of blight.
- **HOME Investment Partnership Program:** This grant is exclusively for the creation of affordable housing for low- moderate-income households.
- **Community Development Block Grant-Coronavirus:** Must be used to prepare for, respond to, or prevent COVID-19.

The majority of the CDBG funds and all HOME funds must have beneficiaries that earn 80% or less of the Area Median Income (AMI) for the Greeley Metropolitan Statistical Area (MSA), which encompasses all of Weld County. Income limits are based on family size, and HUD releases new income limits annually. The 80% income in 2021 for the Greeley MSA was \$70,800 for a family of four, which is defined as a "moderate" income. The "beneficiary" may be a neighborhood, an individual, or a household. By HUD definition, "moderate income" is between 51% and 80% of AMI; "low income" is 31%-50% of AMI; and "poverty level income" is 30% or less of AMI.

Grant awards from HUD in 2021 were \$844,698 (CDBG) and \$409,150 (HOME). The CDBG grant was an increase from the 2020 awards of \$838,398 (CDBG) and a reduction from the 2020 HOME grant of \$423,374. There was also program income and revolving loan fund income generated during the year. The City has received \$1,020,067 in CDBG-CV funds.

Reporting to HUD and draws against the grants are done online through the Integrated Disbursal and Information System (IDIS). (A "draw" is the City reimbursing itself for CDBG or HOME expenses by "drawing down" the grant funds from the U. S. Treasury through the IDIS system.) The City must respond to specific questions for each step of the Consolidated Planning process: Five-year Strategic Plan, Annual Action Plans, and the CAPER. Terminology may not be familiar to the public; definitions or further explanation of any information in the CAPER is available from the Greeley Urban Renewal Authority (970-350-9380) during the office hours of 9:00 a.m. to 4:00 p.m. The CAPER in a form other than written English may be provided upon request by contacting GURA.

## CR-05 - Goals and Outcomes

### Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The activities noted below are those on which funds were drawn or which had significant progress in 2021. Each activity met a goal set in the 2020-2024 Consolidated Plan. Goals were set to meet priority needs identified.

#### Neighborhood Revitalization

- **Redevelopment District Infrastructure Phases 4, and 5-Central Greeley** – Curbs, gutters, sidewalks, and ramps issues were addressed. Phase 4 and Phase 5 (CDBG 2020 and 2021) were completed during 2021, with final draws occurring in early 2022. The targeted area for both Phases was 23<sup>rd</sup> and 11<sup>th</sup> Avenues and 11<sup>th</sup> and 13<sup>th</sup> Streets.
- **Parkway Tree Planting** –Twenty-three properties received one or more trees, with 25 trees planted during 2021.
- **Alley Reconstruction** – Seventeen blocks of gravel alleys were reconstructed using asphalt millings. Reconstruction improves the appearance of neighborhoods, reduces dust, improves safety, and improves substandard infrastructure. The activity was completed, but final drawn not made during 2021.
- **Clean-up Weekend** – The annual activity was again held in the spring in 2021.

#### Affordable Housing

- One low-moderate-income household received a housing rehab loan; three low-very low-income household received a housing rehab grant.
- The Greeley-Weld Habitat for Humanity sold two new construction, single-family houses in the Clover Meadows Subdivision (aka Northview Estates) to low-moderate-income buyers. A HOME grant award provided a direct subsidy to the buyers reduced the sales price.

#### Public Services and Facilities that Assist Persons who are Homeless, Low-Moderate-Income, Underserved, or have Special Needs

- The **Greeley Transitional House (GTH-dba Greeley Family House) and Catholic Charities (Guadalupe Community Center)**, both of which provide shelter and services to the homeless, continued to receive CDBG to support staff who worked with homeless families (GTH) and single men and women (Guadalupe) on housing issues. The services also included working with landlords and providing tenant education. The goal for all participating is to be housed and achieve self-sufficiency.
- Staff of the Guadalupe Community Center was also supported at the **Cold Weather Shelter** during January-March in 2021 (2020 CDBG) and again in November and December 2021 (2021 CDBG. United Way of Weld County was the CDBG applicant. January-March 2021 was reported on in IDIS in 2020; the activity for November-December 2021 isn't set up in IDIS, so no beneficiary numbers are reported on in this CAPER.
- **North Colorado Health Alliance** and a number of community partners continued the Community Action Collaborative, a service that helps connect 9-1-1 callers with non-emergency issues to services and housing.

- **Senior Resource Services** (dba 60+ Ride) provided transportation services for seniors. Destinations included medical appointments, grocery stores, financial and government institutions, social events, houses of worship, and personal grooming appointments. The service also included delivery of groceries and prescriptions and other medical needs to seniors' homes.
- **CDBG-CV** – There are no accomplishments to report with regard to CDBG-CV funds.

**Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)**

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
SF, owner-occupied housing rehab loans	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	23	2	8.71%	5	1	20%
SF, owner-occupied housing rehab grants	Affordable Housing	CDBG: \$	Homeowner Housing Rehabilitated	Household Housing Unit	12	4	33.33%	4	3	75.00%
Acquisition or infrastructure support-SF housing	Affordable Housing	CDBG: \$ / HOME: \$	Homeowner Housing Added	Household Housing Unit	31	0	0.00%	8	0	0.00%
Acquisition or infrastructure support-MF housing	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	75	0	0.00%	40	0	0.00%
Multi-family housing-rental rehab loans or grants	Affordable Housing	CDBG: \$	Rental units rehabilitated	Household Housing Unit	15	0	0.00%	5	0	0.00%
Assistance to housing specific public services	Affordable Housing	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	2500	84	3.36%	500	62	12.4%
Public improvements-infrastructure	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	10000	4400	44.00%	2000	4400	100%
Public improvements-alley reconstruction	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250	4125	100%	50	3285	100%

Public improvements-parkway tree planting	Non-Housing Community Development	CDBG: \$	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	1500	16,861	100%	300	7760	100%
Property conditions-clean-up weekend	Non-Housing Community Development	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	6250	41,182	100%	1250	2387	100%
Assistance to public services not housing related	Homeless Non-Homeless Special Needs	CDBG: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	7500	1566	20.88%	1500	389	25.93%
HOME Program-homeownership	Affordable Housing	HOME: \$	Homeowner Housing Added	Household Housing Unit	41	6	14.63%	7	2	28.57%
HOME Program-Rental housing	Affordable Housing	HOME: \$	Rental units constructed	Household Housing Unit	75	0	0.00%	40	0	0.00
CARES Act Funding-Emergency Rent Assistance	Affordable Housing	CARES Act Funding-CDBG-CV: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	100	0	NA	0	0	NA
CARES Act Funding-Public services for LMI	Prepare for, prevent, respond to COVID-10	CARES Act Funding-CDBG-CV: \$	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	275	0	NA	0	0	NA
CARES Act Funding-Public services for LMI	Prepare for, prevent, respond to COVID-10	CARES Act Funding-CDBG-CV: \$	Homeless Person Overnight Shelter	Persons Assisted	125	0	NA	0	0	NA
CARES Act Funding-Public services for LMI	Prepare for, prevent, respond to COVID-10	CARES Act Funding-CDBG-CV: \$	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	NA	0	0	NA

CARES Act Funding-Public services-Urgent Need	Homeless Non-Homeless Special Needs Prepare for, prevent, respond to COVID-10	CARES Act Funding- CDBG-CV: \$	Other	Other	180	0	0.00%	0	0	NA
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**Table 1 - Accomplishments – Program Year & Strategic Plan to Date**

**Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.**

The City’ addressed its **high** priorities in the following manner:

1. Neighborhood Revitalization (CDBG)

Several activities addressed the public improvements priority.

- a. Work on two phases of a large infrastructure project was in various stages during 2021; all work was completed. The activities included installation of sidewalks, curbs, and gutters in the Maplewood neighborhood where none existed, replacement of substandard sidewalks, and work associated with installation/replacement. Completion in IDIS will occur after draws for release of retentions and payments of Activity Delivery Costs.
- b. In the Redevelopment District (Maplewood neighborhood; north Greeley), 17 blocks of alleys were reconstructed, taking them from gravel to re-purposed asphalt. Work on activity was completed, but because there were issues with the City’s new finance system and attaching Activity Delivery Costs to each activity, final draw and completion in IDIS were not able to be done.
- c. Tree planting in the parkways of the Redevelopment District also continued. Twenty-three properties received one or more trees; 25 trees were planted.

2. Affordable housing

- a. Maintaining affordable housing was addressed with CDBG through the continuation of the Single-family Housing Rehabilitation programs (loans and grants). One loan and three grant were provided in 2021.
- b. Greeley-Weld Habitat for Humanity (HOME-homeownership) sold two houses to qualified buyers, addressing the need for additional units of affordable housing.
- c. CDBG continued to support two housing-related public services: Greeley Transitional House and Catholic Charities-Guadalupe to partially fund a housing case manager at each agency.

Priorities that the City ranked **low** included the following:

- 1. Support public facilities that serve the homeless, low-moderate-income, underserved, and/or special needs residents or neighborhoods
  - a. There were no 2021 activities under this priority.
- 2. Support public services that aren’t specifically tied to housing, but assist the homeless, low-moderate-income, underserved, and special needs populations.
  - a. CDBG funds supported public service activities of the North Colorado Health Alliance (callers to 911 with non-emergency needs), Catholic Charities-Guadalupe (shelter and service homeless persons), United Way Cold Weather Shelter (two activities: (1) Jan-mid-March 2021 and (2) November and December 2021); and Senior Resource Services (transportation for seniors).

The City allocated a majority percentage (approximately 90%) of its non-administrative 2021 grant for activities that included infrastructure improvements and support of affordable housing, the highest priorities of the 2020-2024 Consolidated Plan.



## CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

**Direct Benefit Activities:** The City tracked demographics for households directly benefiting from the CDBG and HOME grant programs, including race, ethnicity, family size, and (in most cases), which had female heads of households and/or a disability. The information is used for IDIS reporting and also (in the case of housing activities) for fair housing statistics. Direct benefit activities utilizing CDBG funds included:

- Housing activities (rehab loans and grants)
- Public services (case manager support at Greeley Transitional House and Guadalupe Community Center, Community Action Collaborative; and Senior Resource Services)

Demographic data is also collected for Habitat for Humanity-produced housing (HOME funds) and during the monitoring of developments with HOME units.

	CDBG	HOME
White	400	1
Black or African American	2	1
Asian	2	
American Indian or American Native	6	
Native Hawaiian or Other Pacific Islander	3	
<b>Total</b>	<b>413</b>	<b>2</b>
Hispanic	33	0
Not Hispanic	380	2

Table 2 – Table of assistance to racial and ethnic populations by source of funds

**In-direct Benefit Activities:** Activities with in-direct benefits are those that benefit an area, rather than an individual or household. LM Universe is total population; LM Area is population having low-moderate-income.

CDBG Indirect Benefit Activities	LM Universe	LM Area	% LMI	% Hispanic
Phase 4 Infrastructure-2020	3,610	2,200	60.94%	38.79%
Phase 5 Infrastructure-2021	3,610	2,200	60.94%	38.79%
Alley reconstruction	4,835	3,285	67.97%	64.28%
Trees in Parkways	10,700	7,760	72.52%	50.46%
Clean-up Weekend	63,610	35,115	55.20%	41.65%

Table 2b – Table of assistance to racial and ethnic populations by source of funds – CDBG area benefit activities

### Narrative

To meet requirements of federal grants and assist people who are non-English speakers who want to access programs and activities, the City completed a Four-Factor Analysis and Language Assistance Plan prior to the start of the current Consolidated Plan identify languages with a high usage in Greeley.

The Hispanic ethnicity was identified as the only minority group with a large percentage of persons in Greeley.

The Analysis data is supported by the U. S. Census Bureau’s Quick Facts for Greeley (based on populations estimates on July 1, 2019), which shows the White, Non-Hispanic population in Greeley at 60.1% and the Hispanic population at 39.1%. The Black/African American race, per Quick Facts, accounts for 13.4% of Greeley population on the date noted; however, there isn’t one language or dialect associated with this race in Greeley. All other races are represented by a percentage of less than 2% per race, according to the ACS data.

**CR-15 - Resources and Investments 91.520(a)**

**Identify the resources made available**

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,010,968	539,747
HOME	public - federal	431,046	66,869

**Table 3 - Resources Made Available**

**Narrative**

Refer to table above. CDBG information was taken from the IDIS PR26 report (CDBG Financial Summary Report). The City’s Comprehensive Annual Financial Report (CAFR) has not been completed for 2021. HOME information was based on the 2021 grant plus receipted program income (resources made available) and expenditures from the IDIS PR05 report. (amount expended during program year). Because the City’s fiscal year may not be completely closed out when the CAPER is due for submittal, there may be adjustments needed. Additionally, there may be resources and draws for 2020 income/expenditures in 2021 information and not all resources and expenditures in 2021 may have been yet accounted for in IDIS information.

**Identify the geographic distribution and location of investments**

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Redevelopment District- Comprehensive	85%	55%	The percentage includes only those activities that were located only in the Redevelopment District. Public service activities are available to residents and homeless without regard to location. That brings the percentage down.

**Table 4 – Identify the geographic distribution and location of investments**

**Narrative**

There are 38 census tracts within Greeley boundaries, 13 of which have a low-moderate-income percentage that exceeds 51% (1, 2, 4.02, 5.01, 5.02, 7.01, 7.03, 8, 10.3, 10.5, 2.01, 13, and 14.05), 14 if CT 6 is counted (far NE corner; very few residents). Additionally, there are block groups with more than 51% of the residents earning low-moderate-incomes (if looked at alone and not as a part of the entire census tract): Block Groups 1 and 4 in Census Tract 4.01; Block Groups 3 and 4 in Census Tract 11, and Block Group 2 in Census Tract 14.17.

Greeley’s low-moderate-income census tracts are east of 35<sup>th</sup> Avenue and are included in the Redevelopment

District. The only Census Tract west of 35<sup>th</sup> Avenue that has a greater than 51% LMI percentage is 14.05, which is predominantly commercial. Most of the residential in that Census Tract is apartments, which includes some developments specifically for LMI residents. Census Tract 14.05 is not a part of the Redevelopment District.

**Leveraging**

**Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.**

**CDBG** –Non-profit agencies utilizing CDBG for activities are expected to provide the majority of the activities’ funding from sources other than CDBG. Those other funds are generally from agency fund raising events and include private, corporate, and foundation donations. When available, the City matches its in-house activities with City funds, including General Funds, Quality of Life funds, or Sales Tax Dollars (local programs).

**HOME** – By waiver, HUD reduced the matching requirement for Participating Jurisdictions in areas covered by a major disaster declaration (which included the City of Greeley) by 100 percent for FY 2020 and FY 2021. This was meant to ease the economic burden on Participating Jurisdictions and eliminate the need for them to identify other sources of match for HOME activities during the COVID-19 pandemic. The City was able to meet its normal match requirement of 25% in 2021, however, with Match coming from two homes constructed and sold by the Greeley-Weld Habitat for Humanity. Match was provided via donated goods, private funds, donations from corporations and foundations, etc. At this time, Greeley does not count volunteer hours, although they are eligible as match.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	\$6,171,256
2. Match contributed during current Federal fiscal year	\$354,889
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$6,526,145
4. Match liability for current Federal fiscal year	\$0.00
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$6,526,145

**Table 5 – Fiscal Year Summary - HOME Match Report**

<b>Match Contribution for the Federal Fiscal Year</b>				
<b>Project No. or Other ID</b>	<b>Date of Contribution</b>	<b>Cash (non-Federal sources)</b>	<b>Site Preparation, Construction Materials, Donated labor</b>	<b>Total Match</b>
1 <sup>st</sup> Clover Meadows (#32)	5/11/21	137,000	40,461	177,461
2 <sup>nd</sup> Clover Meadows (#33)	5/11/21	137,000	40,428	177,428
<b>Total Match</b>		<b>274,000</b>	<b>80,889</b>	<b>354,889</b>

**Table 6 – Match Contribution for the Federal Fiscal Year**

**HOME MBE/WBE report**

<b>Program Income – Enter the program amounts for the reporting period</b>				
<b>Balance on hand at beginning of reporting period</b> \$	<b>Amount received during reporting period</b> \$	<b>Total amount expended during reporting period</b> \$	<b>Amount expended for TBRA</b> \$	<b>Balance on hand at end of reporting period</b> \$
\$147,936	\$5,576	\$61,292	\$0.00	\$81,068

**Table 7 – Program Income**

<b>Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</b>						
	<b>Total</b>	<b>Minority Business Enterprises</b>				<b>White Non-Hispanic</b>
		<b>Alaskan Native or American Indian</b>	<b>Asian or Pacific Islander</b>	<b>Black Non-Hispanic</b>	<b>Hispanic</b>	
<b>Contracts – (based on properties closed in 2021 = 2990 C St #32 &amp; #33 )</b>						
Number	1	0	0	0	0	0
Dollar Amount	\$61,292	0	0	0	0	0
<b>Sub-Contracts</b>						
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0
		<b>Total</b>	<b>Women Business Enterprises</b>		<b>Male</b>	
<b>Contracts</b>						
Number	1		0		0	
Dollar Amount	\$61,292		0		0	
<b>Sub-Contracts</b>						
Number	0		0		0	
Dollar Amount	0		0		0	

**Table 8 - Minority Business and Women Business Enterprises**

**Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition**

Parcels Acquired	0
Businesses Displaced	0
Nonprofit Organizations Displaced	0
Households Temporarily Relocated, not Displaced	0

Table 9 – Relocation and Real Property Acquisition

**Minority Owners of Rental Property** – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted

	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 10 – Minority Owners of Rental Property

Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

Table 11 – Relocation and Real Property Acquisition

## CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	1-Year Goal	Actual
Number of homeless households to be provided affordable housing units	0	0
Number of non-homeless households to be provided affordable housing units	47	2
Number of special-needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>47</b>	<b>2</b>

Table 12 – Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance	0	0
Number of households supported through the production of new units	47	2
Number of households supported through the rehab of existing units	15	4
Number of households supported through the acquisition of existing units	0	0
<b>Total</b>	<b>62</b>	<b>6</b>

Table 13 – Number of Households Supported

**Discuss the difference between goals and outcomes and problems encountered in meeting these goals.**

The City set high goals for affordable housing with its 2020-2024 Consolidated Plan and made affordable housing a high priority for those years. Outcomes have not reached the goals set; several reasons can be identified:

- CDBG Single-family rehab numbers continued to be down. The lack of contractors willing to work on rehab jobs and with the federal requirements has diminished to the point that continuing a rehab loan program does not seem viable. Coupled with homeowners not wanting to take out a loan for rehab, the housing rehab loan program appears to have reached the end of its life. The GURA Board will discuss both the rehab loan and grant programs in early 2022 and determine the fate of both programs.
- Environmental concerns (such as lead paint, asbestos, radon, etc.) and costs for testing and/or mitigation that could exceed the limits of the Rehab Programs and what low-moderate-income homeowners can afford are a deterrent to utilizing the program.
- Habitat for Humanity, which generally constructs five or more homes in Greeley utilizing HOME as supportive funding, put a good deal of its 2021 focus on completing a large subdivision in Evans, CO (adjacent to Greeley on the south). Habitat also ran into some zoning issues at its current Greeley subdivision and spent a good portion of 2021 trying to work through those. It is expected that Habitat will be back on track with five-ten houses constructed and sold in 2022 and received a preliminary award for 10 houses to complete the current subdivision.
- No good acquisition or acquisition/rehab projects for multi-family housing has presented. CDBG and/or HOME funds are available, but have yet to be used.
- While a project that will include rehab of existing and construction of new multi-family housing is being worked on, the financing (that is predominantly Low-Income Housing Tax Credits) was still being finalized in 2021. The City still feels this is a good project and expects it to commence in 2022.

**Discuss how these outcomes will impact future annual action plans.**

The City expects to continue its commitment to affordable housing throughout the 2020-2024 Consolidated Plan years. While the start has been slow, there are developments close to being ready. The City will continue to be supportive of the work done by Greeley-Weld Habitat for Humanity, as even in times of escalating construction costs and sales prices, it produces homeownership units that can be affordable to the buyers who have low-moderate incomes. After completion of their current subdivision (Clover Meadows aka Northview Estates), they anticipate beginning a large development that will include more than 100 houses. It is expected that HOME funds will continue to provide assistance to this home buyer program.

**Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.**

<b>Number of Households Served</b>	<b>CDBG Actual</b>	<b>HOME Actual</b>
Extremely Low-income	3	
Low-income	1	2
Moderate-income		
<b>Total</b>	<b>4</b>	<b>2</b>

**Table 9 – Number of Households Served**

**Narrative Information**

The table numbers represent households served by an affordable housing activity only. The single-family rehab loan program and the Habitat for Humanity homeownership program both typically support low-income households. The single-family rehab grant program, however, is generally accessed by households with extremely-low incomes (elderly and disabled, generally

The City is strong in its commitment to increasing and improving the supply of affordable housing stock in Greeley and is looking at ways to address the housing needs of the most vulnerable as part of that commitment. In late 2021, the City contracted with a consultant to assist with gathering and evaluating housing data, examining housing-demand drivers, determining market and financial viability and feasibility, and estimating capital and operating costs for possible sheltering of homeless persons and housing alternatives. There will be opportunities for community engagement at several times during the process.

Multiple agencies in Greeley work with homeless individuals and families, including the Coordinated Housing Assessment and Placement System (CAHPS), which specifically helps people experiencing homelessness find and maintain housing. There has been no new developments of housing specifically for persons with disabilities. The City follows ADA guidelines for new construction of housing.

**CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**

**Evaluate the jurisdiction’s progress in meeting its specific objectives for reducing and ending homelessness through:**

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

- United Way of Weld County’s Housing Navigation Center (HNC) facilitates a Lived Experience Committee for people who are experiencing homelessness and who utilize homelessness response services in Greeley, with its main objective to gather feedback from people with lived experience to 1) help inform and improve programming and services, 2) identify gaps in community resources, and 3) address neighborhood challenges around the HNC and cold weather shelter. By empowering people who receive homelessness services, the Lived Experience Committee aims to create a sense of ownership in

addressing the challenges of homelessness in the Greeley community.

- The Housing Navigation Center provides services to people experiencing homelessness or household instability, to help them survive their experience of homelessness, help people connect back to housing, and to prevent people from experiencing homelessness in the first place. The HNC provides many in-house services: lockers, mail access, computers for job and housing searchers, ID and birth certificate assistance, resource and housing navigation, hygiene and clothing donations, and a seasonal cold weather shelter. Additionally, 16 community partners hold office hours in the space to assist guests with other services. The HNC has provided services to 1,095 households, connected 179 households to permanent housing, and diverted 68 households from homelessness. The HNC services have been accessed 21,359 times, and the HNC has provided 773 community referrals and has hosted 5,529 meetings between guests and other service providers.
- During the 2020 – 2021 cold weather shelter season, there were 388 unduplicated individuals served with 7,344 nights of shelter provided. The shelter again operated at reduced capacity due to COVID-19 social distancing requirements. The vast majority of the guests served (341) were extremely-low income (below 30% of AMI - \$19,082).
- 13 agencies in Greeley work with homeless individuals and families, including the Coordinated Housing Assessment and Placement System (CAHPS also known as the Coordinated Entry System), which specifically helps people experiencing homelessness find and maintain housing.
- The annual Point-in-Time Count was held in January 2021.
- The Northern Colorado Veterans Resource Center assesses the needs of Veterans who are homeless and who approach them for assistance.

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

In addition to overnight stay, extended stay is offered at the Guadalupe Community Center, the Greeley Transitional House, and A Woman's Place. All provide significant support that focuses on self-sustainability. Shelters have stayed operational during COVID-19, but still operate at reduced capacity.

On the 2021 Point-in-Time Count night, there were 172 persons receiving emergency shelter and 43 in transitional housing.

#### **Emergency Shelter**

- The Guadalupe Community Center (Guadalupe), with 24 beds for men, six beds for women, and five separate family room provided 8,097 nights of shelter in 2021. COVID-19 presented challenges to operations, reducing capacity and requiring some motel stays for some single women and families. Providing a congregate setting with minimal COVID-19 exposure became priority, with Hospital-to-Housing patients the first to be accepted. Test results turnaround times delayed new residents entering for two months. No emergency shelter services were provided in the Community Room after April 2020. Services continued to be provided by case managers.
  - Nineteen single women received emergency short-term triage care at a local motel. Until the end of April, they sheltered at the Cold Weather Shelter.
  - A community team, the Emergency Family Coordination Team, comprised of the Greeley Transitional House, A Women's Place, Weld Department of Human Services, Hope at Miracle



House, Almost Home, Weld County School District Six, and Catholic Charities worked with case managers at the Guadalupe Community Center and families to develop housing plans and resolutions of other emergency needs. In 2021, 13 families were served at the Guadalupe Shelter with a total of 33 children.

- Seven families received emergency assistance at a motel. All were single-mom-families; a total of 12 children were served.
- The Greeley Transitional House provided emergency shelter (4,872 individual nights) and supportive services to 39 families (51 adults and 124). Supportive services included case management, housing navigation and stabilization, and management of rapid rehousing and transitional housing grants. Numbers were down significantly due to COVID-19 restrictions.
- A Woman's Place provided emergency shelter for survivors of domestic violence. In 2021, 3,743 nights of shelter were provided to 286 survivors, 129 of which were youth under 19 (45%). The average stay was 27 days.
- The Cold Weather Shelter provided shelter to 188 people January-to-mid-April 2021, and 212 in November and December 2021, including 82 women and 291 men; 188 reported having a disability of some type. Shelter information is available on the United Way 2-1-1 website in dozens of different languages.
- The Northern Colorado Veterans Resource Center's Peer Navigation Program assists homeless Veterans with a motel voucher while helping connect them to permanent housing.

### Transitional Housing

- The Greeley Transitional House provided three post-shelter housing programs for families: a Rapid Rehousing (ESG-RRH) program, Camfield Corner Apartments (16 units of transitional housing), and the North Front Range Rapid RE-Housing (NFR-RRH) program, which partners with private landlords throughout Weld County. Forty-eight families were served.
- The Guadalupe Community Center operated a Transitional Living Extended Stay Shelter program focused on moving the residents to sustainability through income acquisition, employment, and affordable housing as quickly as possible.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

Since its April of 2019 opening, the Housing Navigation Center has diverted 68 households from homelessness (6% of all households served). This often means reunifying with family, friends and other support networks by providing gas vouchers, bus passes, mediation, etc. Additionally, since January 1, 2020 the HNC helped 55 people connect to employment or other cash assistance.

In 2020, Weld and Larimer Counties formed the Northern Colorado Continuum of Care, and no longer were part of the Balance of State Continuum. The Continuum's goal is for homelessness in Weld and Larimer Counties to

be rare, brief, and non-recurring.

Greeley has found a good, consistent network system the best way to help the categories of people noted in the question. City staff frequently received email blasts from the “Connections” group previously referenced stating, “I have someone who is...” or “I have someone who needs”, followed with specific requests to the large community of non-profit and governmental agencies that might be able to help.

The Hospital-to-Housing Program at the Guadalupe Center cared for 12 NCMC patients from July 1 2020-June 30, 2021. A total of 1,162 days/night of shelter and service were provided. Program intent is to avoid a return to the emergency room or hospital readmission and ultimately a program outcome of housing. Support services continue for up to six months after the patient is housed.

Other services to help individuals and families avoid homelessness are highlighted below (not all-inclusive of what is available in Greeley):

### **General Emergency Assistance**

- In 2021, The Homeless Prevention Program administered by Catholic Charities assisted in the following ways: Rent assistance-61 households, \$51,407; utility assistance-293 households, \$180,240. Total served: 513 adults (72 of whom were over 60); 449 children under 18 years. Average assistance was approximately \$654 per assistance. More than 552 calls were recorded from people seeking utility assistance and more than 884 from people needing rent assistance.
- The Greeley Transitional House and Weld County School Districts administered a Rapid Re-Housing Grant (NS2G) to identify families via McKinney-Vento. Thirty-nine (39) months of rent and/or security deposit assistance provided.
- A number of churches and other charitable organizations provided emergency funds for rent and utility assistance. COVID funds through Weld County provided significant amounts of rent and utility assistance, as well.
- United Way of Weld County’s 2-1-1 Resource and Referral had 7,356 northeastern Colorado contacts. Rent, utility, housing, food, and shelter assistance were the top five needs.

### **Assistance for Persons with a Criminal Record**

- Jobs of Hope provides services to men 18 and older who were released from incarceration, had gang affiliation, and struggle with substance abuse with employment and housing support. In 2021, there were 51 men enrolled; 33 Hispanic and 41 identified as homeless and living in conditions not meant for habitation. All had incomes below poverty level. In 2021, Jobs of Hope opened a 14-bed transitional housing program to provide temporary housing to homeless men enrolled in the Jobs of Hope program.
- The Guadalupe Community Center provided shelter and support services to those exiting the community correction system (excluding those on the Sexual Registry or who committed a recent violent crime).

### **Assistance for Veterans**

- Weld County Veterans Services offer no-cost assistance to veterans and their families. The website also provides links to other non-profit agencies providing veterans' services.
- The Guadalupe Shelter contracts with the VA to serve homeless veterans and help them with healing and self-sufficiency goals.
- Through its Veteran Peer Support Navigation, Northern Colorado Veteran Resource Center assisted veterans and their families in receiving services, benefits, and resources.

**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**

- United Way of Weld County continued to implement “Weld’s Way Home” – the local strategic plan to address and prevent homelessness. Weld’s Way Home involves long term strategic planning with 35+ other community partners working to end and prevent homelessness in Weld County. The Weld’s Way Home work group met monthly to develop an updated of the original strategic plan which was finalized in 2016. The new Weld’s Way Home 2.0 Strategic plan contains 11 priority areas, identified by community stakeholders, that focus on increasing household stability and connecting people back to permanent housing. A few of these priority areas include developing relationships with police and landlords, increasing case management and street outreach capacity, and improving community transportation.
- The City supported the costs to lease the Housing Navigation Center/Cold Westher Shelter building in 2021. The HNC/CWS will move in 2022 to a new location. The HNC works diligently to get people into housing as quickly as possible or connect them to services so that homelessness can be avoided altogether.
- Northern Colorado (Larimer and Weld counties) was formally recognized by HUD as a Continuum of Care (CO-505, Fort Collins, Loveland, Greeley/Larimer and Weld Counties) in January 2020. In 2021, CoC activities primarily focused on supporting local agencies with COVID-19 planning and response. The City of Greeley has a seat on the governing board, and all annual CoC-mandated activities (such as the Point in Time and Housing Inventory Counts) are facilitated locally by the CoC Collaborative Applicant (United Way of Weld County) and CoC HMIS Lead (Homeward Alliance).
- Part of the continued emphasis of the NoCO CoC is getting people permanently housed through the local Coordinated Entry System. As of December 31, 2021 the following number of people experiencing homelessness had been assessed/housed:
  - Veterans Assessed since 2016 – 591; Veterans Housed since 2016 – 514
  - Single Adults Assessed since 2017 – 1389; Single Adults Housed since 2017 – 451
  - Families Assessed since 2018 – 560; Families Housed since 2018 – 398
  - Youth Assessed since 2019 – 85; Youth housed since 2019 - 23
- The Northern Colorado CoC received \$2.3 million in Emergency Solutions Grant (ESG) funding for the

region. \$80,000 in annual ESG funds went to Weld County agencies for rapid rehousing and administrative expenses and \$703,619 in ESG-CV funds went to Weld County for non-congregate shelter and administrative expenses.

- Case management is provided at all shelters in Greeley, with a focus on deterring homelessness or shortening the length of shelter stay when possible. A continuing trend is for shelter residents to be employed, but not able to find affordable housing. The COVID-19 pandemic presented challenges to social distancing and in-person meetings.

### **CR-30 - Public Housing 91.220(h); 91.320(j)**

#### **Actions taken to address the needs of public housing**

Due to COVID issues, the Greeley Housing Authority staff reported that no actions to improve the interiors of apartments were taken, so as to avoid displacing tenants. The Housing Authority was able to keep both the onsite office and main office open during the pandemic.

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

The Housing Authority has a disabled public housing tenant who serves as a Commissioner on the Housing Authority Board. Due to COVID-19, the goal of having a Tenant Advisory Board with monthly meetings was delayed. This goal will be relooked at once health conditions improve. Higher income tenants are still encouraged to consider the purchase of a home.

#### **Actions taken to provide assistance to troubled PHAs**

Not applicable. The Greeley PHA is not troubled.

### **CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)**

#### **Actions taken 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. 91.220 (j); 91.320 (i)**

The City continued to work toward implementing the action items identified in its 2019 Strategic Housing Plan. The Plan provides a blueprint for ameliorating or removing some of the negative effects of public policy. During 2021, the following occurred:

- **Amendment of the development code to promote housing choice:** In 2021, the City adopted a new development code that included significant changes to lot sizes and mixed zoning categories. These changes will encourage development at higher densities and lower per unit costs.

- **Development of financial strategies that minimize development costs:** For the past two years, the City has assigned its annual Private Activity Bond allocation to the Colorado Housing & Finance Authority to be used for as tax credit bond financing to assist with three identified affordable housing projects, which will add more than 700 units. The City was also fortunate to partner with Weld County, and they assigned their annual allocation to be used for these projects as well.
- **Impact of raw water costs:** The City continues to address the impact of raw water on housing affordability. In 2021, a transaction known as Terry Ranch was completed, which secured 1.2M acre feet of raw water for future use and will provide a cost-effective underground water storage reservoir for decades.
- **Development of manufactured housing communities:** One of the City's most visible and highest quality manufactured homes parks is expanding, with the approval of an additional 129 lots in 2021. These will be developed over the next two years.

Some of the public policies noted in the question do not affect affordable housing in Greeley:

**Tax policies affecting land:** There are no tax policies that create an affordable housing barrier.

**Building codes:** The City adopted the 2018 International Residential Codes, to which all residential construction is subject. Building codes do not inhibit the provision and/or maintenance of affordable housing, but are necessary to providing housing standards for safety and habitability (which HUD also expects).

**Growth limitations:** There are no policies regarding growth limitations in Greeley. Growth is restricted by jurisdictional boundaries, which directs much of the growth west.

**Policies affecting the return on residential investment:** There are no public policies other than those imposed on properties that received assistance from HUD (CDBG and/or HOME) that affect the return on residential investment.

**Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)**

See information throughout the CAPER, such as support for the Guadalupe Community Center (homeless), Greeley Transitional House (homeless families), Community Action Collaborative (persons in need that call 911 with non-emergencies), Senior Resource Services (seniors needing transportation), and Habitat for Humanity (for-sale housing to low-income households).

**Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)**

No new actions were taken in 2021 to reduce lead-based paint hazards; however, the City continued to address lead paint hazard issues through the following:

- GURA policy requires that testing for lead-based paint be done by a certified lead-based paint inspector on any house constructed prior to 1978. This policy is applicable when the proposed rehab includes work that would disturb any existing painted surface, such as replacement of windows or doors or exterior painting.
- GURA policy also requires that all rehab work that disturbs a painted surface be performed by an Environmental Protection Agency (EPA) certified Renovation, Repair, and Painting (RRP) Program

contractor who has been properly trained in setup, disposal, and clearance of affected areas. Safe handling of all lead-based paint is part of the rehab contract.

- The GURA Manager holds two lead-based paint certifications from the Colorado Department of Public Health and Environment, Air Pollution Control Division. The certifications are Lead-Based Paint Inspector and Lead-Based Paint Assessor. GURA's Manager attends lead-based paint training when available.
- Applicants for all housing rehab activities are provided information packets about the dangers of lead-based paint when applying for assistance. Both English and Spanish versions of the information are available.

**Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)**

U. S. Census Quick Facts for 2021 estimated that 15.8% of Greeley families live in poverty. The 2021 Action Plan cited several areas in which actions may reduce the number of poverty-level families:

- Increase in economic opportunities and availability of affordable housing. The Economic Development Division of the City works to attract more businesses to the City that provide livable wages. Affordable housing is a high priority of the City's 2020-2024 Consolidated plan. Support was given through Private Activity Bonds (affordable rental housing), HOME funds (Habitat for Humanity homeownership opportunities), and CDBG (funds were available to support affordable housing and were utilized housing rehab loans and grants).
- Support education. The City provided free bus passes to School District 6 students (elementary through high school).
- Support non-profits assisting poverty level families with CDBG funds in areas of food, shelter, mental and physical health services, transportation, etc.
- Social services provided through Weld County Human Services.

The disproportionate increases to housing costs vs. increases in wages is an issue for Greeley residents, as it is across the country. By working to add affordable housing units, the City hopes to help alleviate this issue. Additionally, the Economic Development Division of the City works to increase economic opportunities available and promote growth in the business community, particularly in areas that offer higher wages.

While none of the actions noted in the CAPER are specifically to reduce the number of poverty level families, the actions do provide families with assistance as they move to improve their lives. There are many social service assistance opportunities that can be accessed through Weld County Human Services and a good support system of non-profit agencies that provide help in the form of food, shelter, mental and physical health services, transportation, etc.

As reported in prior years, some of the agencies whose work may reduce the number of poverty-level families are listed below.

- Women2Women provided emergency financial assistance to women by women.
- The Immigrant and Refugee Center of Northern Colorado provides English language training and community navigation to refugees and immigrants.
- Sunrise Community Health provided health and dental care at seven locations in Greeley with payment based on the ability to pay.

- Connections for Independent Living served persons with disabilities needing to access services and programs. A number of core services are offered: information and referral, peer support, independent living skills training, and assistance in finding and retaining employment.
- North Range Behavioral Health provided a comprehensive set of programs and services for persons with mental illness; addiction; in need of counseling, peer assistance, or crisis support; etc., without regard to someone's ability to pay, and added a program to support people affected by COVID-19. North Range also provided a continuum of residential services, from staffed homes to supported housing and independent living.
- Weld Food Bank administered a number of programs to help alleviate hunger and poverty by providing food and food services to people in need. The COVID-19 pandemic substantially increased the number of persons who are food-insecure.
- The Greeley Interfaith Association and many churches within the faith community provided assistance to those in need, including clothing and meals.
- The Weld County Faith Partnership Council facilitates information sharing between the faith community and county government, with focus on foster care, veterans, housing stability, and youth development.

**Actions taken to develop institutional structure. 91.220(k); 91.320(j)**

The City consistently reports on its strong institutional structure, as it continues to watch for new areas of partnership opportunities. The institutional structure is evident in part through the number of agencies and representatives that participate in the Northern Colorado Continuum of Care and the Connections network; the collaboration among agencies providing shelter that work toward housing the homeless; the faith community which provide meals and clothing to those in need; and in the Community Action Collaborative, a partnership with the City and agencies serving those in need. The strong institutional structure was definitely visible in 2020 and 2021 during the COVID pandemic, as collaborations to assist residents became critical.

In 2020, regional institutional structure (Weld and Larimer Counties) specific issues of homelessness came to fruition with HUD's announcement of the fourth Continuum of Care in the State: Northern Colorado Continuum of Care (NoCOCO). The NoCOCO brings together the Cities, agencies working with homelessness, and other interested parties to identify and house people experiencing homelessness.

As noted elsewhere, the Housing Navigation Center opened to centralize efforts to get people into housing as quickly as possible and provide lockers, mailing address, computers, etc. to homeless persons. In 2021, a new location was identified which will provide one location for the Housing Navigation Center, the Cold Weather Shelter, and a day use facility. It will open early in 2022 at a location in Greeley. The City collaborated with United Way to achieve this success. The facility will initially be supported with CDBG-CV funds, as it will help identify and assist persons vulnerable to COVID-19 and thus meet the requirement to prepare for, prevent, and respond to the COVID-19 pandemic.

**Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)**

Coordination between public and private housing and social services agencies has been detailed in a number of places in the CAPER. Rather than restating, please refer to areas with discussions on the Community Action



Collaborative, the Connections network, Weld’s Way Home, and the City’s implementation of a Strategic Housing Plan. To the extent possible and appropriate, the City and the Greeley Housing Authority have staff that participate in many of the meetings/ groups and help with programs. Additionally, Weld County United Way heads the Emergency Food and Shelter Program committee; a City staff member participates in the committee.

**Identify actions taken to overcome the effects of any impediments identified in the jurisdiction’s analysis of impediments to fair housing choice. 91.520(a)**

With each of the impediments noted below, there were goals and actions. The full Analysis of Impediments to Fair Housing for 2020-2024 is available on request.

**Impediment: Housing Discrimination**

- Fair housing information and sample brochures are available to CDBG and HOME subrecipients on request.
- An Analysis of Impediments to Fair Housing report was adopted in March for the 2020-2024 Consolidated Plan years.

**Impediment: Language and Culture**

- The City has “Limited English Four-Factor Analysis” and Americans with Disabilities Act/Section 504 Effective Communications Policies and Procedures.
- Ads associated with the Action Plan and CAPER in 2021 were published in English and Spanish.
- The City’s website can be translated into multiple languages.
- The City of Greeley subscribes to a language interpretation service for employee use when communicating with customers who speak a language other than English.

**Impediment: Transportation**

- The City gave United Way of Weld County 2,565 adult bus passes via a Memorandum of Understanding, each providing for unlimited rides in a 24-hour period, and 7,200 two-ride passes. They also received 359 Paratransit trip tickets. Twenty-four-hour passes had a value of \$4.50; two-ride passes were each valued at \$3.00. Additionally, United Way was given 350 paratransit trip tickets. Non-profit agencies may request passes for their clientele from United Way.
- Greeley Evans Transit (GET) continued to offer a number of free/discount programs, including free rides to School District 6 students with identification (to school, activities, and back home), discounted fares for seniors and individuals with disabilities, and discount pass booklets further reduce costs for seniors and persons with disabilities.

**Impediment: Lack of affordable housing units disproportionately affecting some protected classes**

- There was no new construction of affordable housing units in 2021 that were specifically to address the lack of units for protected classes (race, color, religion, national origin, sex, disability, familial status).
- Single-family Housing Rehab grant program was available for elderly/disabled persons needing an accessibility ramp. This helps keep people in their home, which may be the most affordable option available to them. The Retired Seniors Volunteer Program constructs the ramps at a materials-only cost.
- Two Habitat for Humanity houses sold in 2021 in the Clover Meadows Subdivision, one to a family of the Black race, one to a family of Hispanic ethnicity. Additional units were constructed and sold in the Evans



community, which neighbors Greeley on its southern border. The City does not track beneficiaries of these units.

#### **Impediment: Higher mortgage loan denial rates for Hispanic/Latino households**

- Aggregate reports from the 2020 Housing and Mortgage Disclosure Act (HMDA) for the Greeley MSA were reviewed (the most current year). The reports showed people of non-White races had significantly higher mortgage loan denial percentages than did people of the White race. Those of Hispanic ethnicity were denied loans at a rate of 17.78% v. non-Hispanic people at 10.26%. There is no information on why loans were denied, and it could certainly be for a reason other than housing discrimination. While the City has no control over loan originations, the data will continue to be monitored.

### **CR-40 - Monitoring 91.220 and 91.230**

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

The City developed a CDBG monitoring plan that includes several layers of activity review; it is unchanged from last year, however, during a monitoring by the City's Community Planning and Development Representative at HUD Denver in 2019, several areas of increased monitoring needs were identified. The City is working to implement some stronger monitoring systems, particularly for in-house infrastructure projects. Briefly, the monitoring plan is as follows:

- At receipt of applications, all proposed activities are reviewed to ensure they further the priorities of the Consolidated Plan, meet a National Objective, and are eligible CDBG activities. Submitting agencies are required to certify they are in compliance with federal requirements as part of the application. The City strives to ensure applicants are informed with respect to the federal obligations by offering two optional-but-encouraged technical assistance meetings to discuss federal obligations prior to the applicant accepting CDBG funds and also makes staff available for consultation upon an applicant's request.
- Throughout the activity, GURA staff maintains close contact with the subrecipients of CDBG funds. Staff is involved in procurement, bidding language (Section 3; Minority and Women Owned Business statements), and contracting (when applicable); meets individually with the awardees to review the City agreements; and makes great effort to notify agencies that staff is available for technical assistance upon request.
- There is also a desk review at the time draw requests are received: Draw requests and invoices are reviewed, beneficiaries are counted, and it is verified that the draw is consistent with the City's agreement.

By policy, annual on-site monitoring should be conducted on a minimum of 10% of the agencies that received funding during that fiscal year, with the goal of on-site monitoring of no fewer than three subrecipients, subject to staff modification based on activities and subrecipients. No on-site monitorings were conducted during 2021 due to the COVID-19 pandemic and concerns for health and safety of staff and subrecipients; however, all other stages of monitoring (above bullet points) were done.

## **Minority-and Women-Owned Business Outreach**

The City does not discriminate against minority or women-owned businesses during the bidding process and has awarded bids to a number of contracts to minority- and women-owned businesses over the years. Greeley is not a large community and has a small pool of contractors willing to bid on work that involves Federal funds. No bidder is discouraged.

When advertising an Invitation to Bid, both the City and GURA include a statement encouraging minority- and women-owned businesses to apply. (They also include a Section 3 statement.) A sample bid invitation by GURA follows: *“Bids are being solicited for (insert job) by Greeley Urban Renewal Authority (GURA). Bids will be accepted until (time) on (date). Bidders must meet qualifications set by GURA. Women- and minority-owned businesses are encouraged to participate. Section 3 requirements for opportunities for low- moderate-income residents and businesses may apply. For more information call (GURA office phone number).”*

## **Citizen Participation Plan 91.105(d); 91.115(d)**

**Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.**

The 2021 CAPER was available for public comment as follows:

- Mailed to the Citizens Committee for Community Development with request that they provide comments between March 26, 2022 and April 12, 2022. There were no comments received.
- Ads were posted in the Greeley Tribune in English and Spanish on March 13, 2022, notifying the public of the public hearing and 15-day comment period from March 26, 2022-April 12, 2022. There were no comments generated from the ads.
- Available for review on City’s website. There were no comments generated by the website.
- Made available at local libraries. No comments were received from library patrons.
- Non-profit agency partners with the City received notice of the availability of the CAPER, were invited to attend the public hearing (both), and were encouraged to provide comments and share it with their clientele.
- The GURA Board of Commissioners’ public hearing to accept the CAPER and recommend that City Council approve the report was held April 13, 2022. There were seven Board members present and one member of the public, who commented on the amount of information available in the CAPER.
- The City Council accepted the report with no further comment on April 19, 2022.

## **CR-45 - CDBG 91.520(c)**

**Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.**

The Federal code noted (24 CFR 91.520(c)) states the CAPER must evaluate the City's progress in meeting its specific objectives for reducing and ending homelessness. The questions in CR-25 mirror what is required under 24 CFR 91.520(c). To avoid duplication, please refer to CR-25 for specifics on how the City is progressing with the issue of homelessness.

There were no goals from the Strategic Plan or 2021 Annual Action Plan that were not met due to pausing, reducing, or discontinuing non-CDBG-CV-related activities.

The City made the following changes to CDBG-CV activities through the Substantial Amendment process:

- Cancelled the emergency rental assistance activity (funding is available for emergency assistance payments through Weld County)
- Cancelled the emergency shelter at Bonell activity (funded through other sources)
- Added an activity to support a Housing Navigation Center/Cold Weather Shelter/day use facility (all under one roof)
- Cancelled the urgent need public service activity (funded through other sources)

**Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?**

No

**[BEDI grantees] Describe accomplishments and program outcomes during the last year.**

Not applicable.

## **CR-50 - HOME 91.520(d)**

### **Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations**

Please list those projects that should have been inspected on-site this program year based upon the schedule in §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

The City has 10 multi-family developments that include HOME units. City policy is a rental monitoring schedule that follows old HOME regulations (every year for projects with 26 or more units, every other year for projects with five to 25 units, and every three years for projects with one to four units). In a typical year, monitoring is conducted annually in July/August; however, due to the COVID-19 pandemic, the City requested and received a waiver of the monitoring requirement that continued through the end of 2021. Per the waiver, the City should conduct on-site monitoring of HOME units within 180 days of the waiver's expiration on December 31, 2021. Assuming it is safe to conduct on-site monitorings in 2022, the City will abide by the terms of the waiver. The HOME units were monitored for rent compliance, as usual.

The 10 developments with HOME units are: Chinook Wind, Fox Run, Twin Rivers, Plaza del Milagro and Plaza del Sol, Stephens Farm Phases I and II, Camfield Corner, La Casa Rosa, and Camelot. All should have had an on-site monitoring in 2022, which will occur when it is safe to do so.

### **Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)**

Because there was no onsite monitoring in 2021, demographic information on monitored units is not available. The City generally sees a high percentage of minority tenants when monitoring.

Other:

- Owners of the HOME units advertise with the Fair Housing symbol
- Resident Selection Criteria and/or leases include a non-discrimination statement
- The City received no complaints of discrimination in 2021

### **Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics**

The two sold Habitat houses were funded with HOME program income: IDIS activity #334-\$30,882.82; IDIS activity #345-\$30,409.41. The activities were new construction of for-sale housing, and all houses are owner-occupied. One home sold to a family identifying as racially Black; the other to a family identifying as Hispanic ethnicity. Both had incomes 30-50% of AMI. Both were single-parent household.

**Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)**

Discussions continue with developers interested in affordable housing construction in Greeley. Private Activity Bonds from Greeley and Weld County were assigned to the Colorado Housing and Finance Authority (CHFA), which in turn, provide them back to support several new developments in Greeley (construction in 2022-2023); HOME funds will support a project involving rehab of a multi-family dwelling and new construction of new units on the same site.

The City continued to partner with Habitat for Humanity on construction of ownership housing. (Habitat accomplishments were discussed elsewhere in the CAPER.) Ongoing conversations on a large Habitat development, expected to include a developer of multi-family units, have also continued.

To continue engaging with alternative housing providers, the City started identification of more than 70 sites city-wide as good locations for housing projects of all types. Staff will continue to have discussions with developers to promote the Greeley market for housing.

## CR-58 – Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG	HOME
Total Number of Activities	1	0
Total Labor Hours	25	
Total Section 3 Worker Hours	2	
Total Targeted Section 3 Worker Hours	2	

**Table 10 – Total Labor Hours**

Qualitative Efforts - Number of Activities by Program	CDBG	HOME
Outreach efforts to generate job applicants who are Public Housing Targeted Workers		
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.		
Direct, on-the job training (including apprenticeships).		
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.		
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).		
Outreach efforts to identify and secure bids from Section 3 business concerns.		
Technical assistance to help Section 3 business concerns understand and bid on contracts.		
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.		
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.		
Held one or more job fairs.		
Provided or connected residents with supportive services that can provide direct services or referrals.		
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.		
Assisted residents with finding child care.		
Assisted residents to apply for, or attend community college or a four year educational institution.		
Assisted residents to apply for, or attend vocational/technical training.		
Assisted residents to obtain financial literacy training and/or coaching.		
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.		
Provided or connected residents with training on computer use or online technologies.		
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.		
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.		
Other - <a href="#">Weld County employment office that connects workers w/available positions in Weld County</a>	X	

**Table 11 – Qualitative Efforts - Number of Activities by Program**

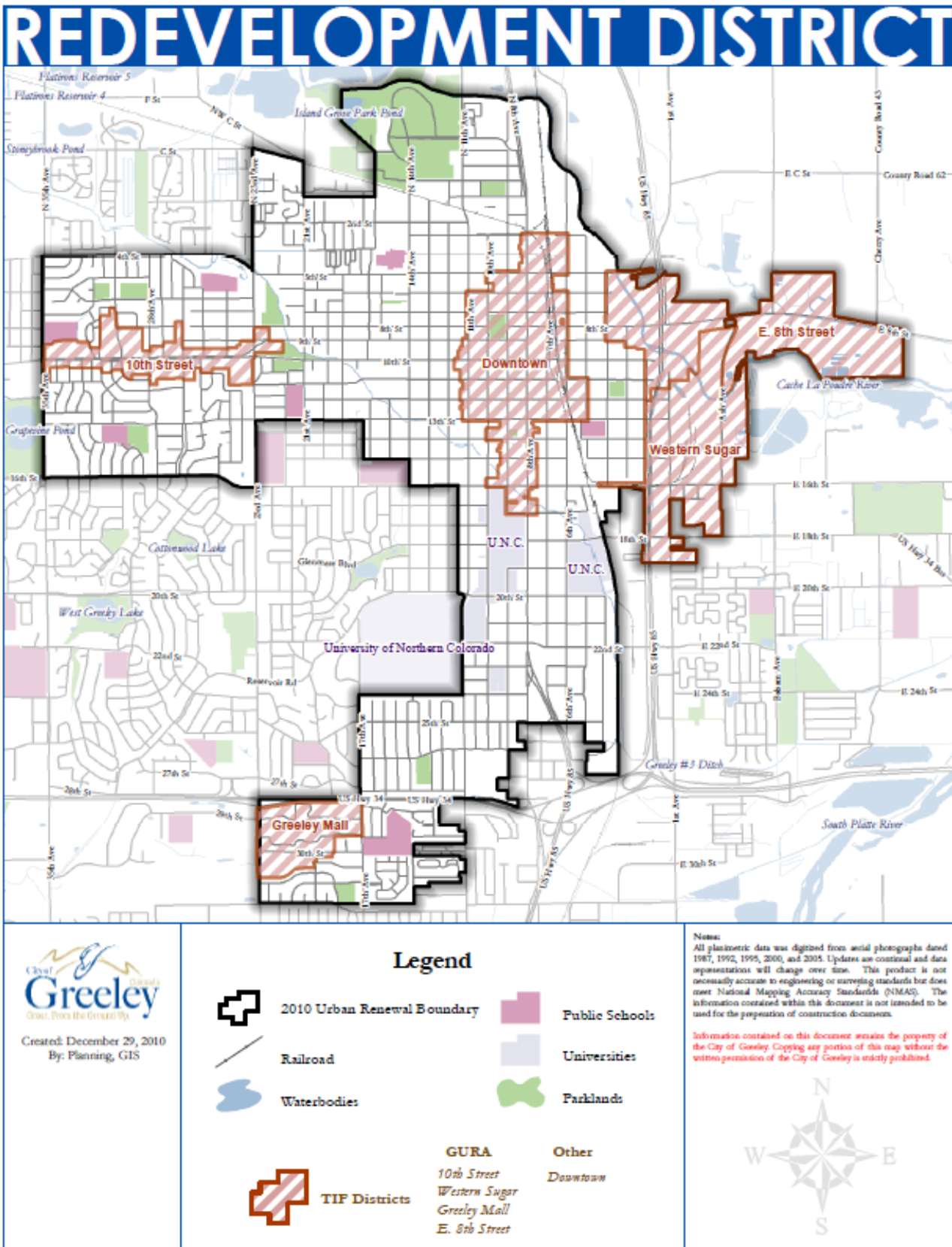
## Narrative

The contractor for the Section 3 activity had no new hires. The City is reviewing ways to increase outreach to Section 3 residents and businesses.

## Attachments

- Attachment 1 – Map – Redevelopment District
- Attachment 2 – Map – Low-Mod Census Tracts in Greeley
- Attachment 3 - HOME Affordability and Recapture Policy
- Attachment 4 – CAPER Ads – English & Spanish
- Attachment 5 – Public Notification and Comments

Attachment 1 – Redevelopment District Map







# STANDARD OPERATING POLICIES & PROCEDURES



## HOME INVESTMENT PARTNERSHIP PROGRAM SUBSIDY, SALES PRICE, AFFORDABILITY, and RECAPTURE of FUNDS FOR NEW CONSTRUCTION OF OWNERSHIP UNITS

Reference HOME Investment Partnership Program (HOME) regulations at 24 CFR 92, particularly 24 CFR 92.254 (“Qualification as affordable housing: Homeownership”) and 24 CFR 92.503 (“Program income, repayments, and recaptured funds”) with respects to HOME funds assisting the development of homeownership units.

**5/17/19 – These policies, as stated below, were Attachment 5 – HOME Affordability/Recapture Policy for Home-ownership for the 2019 Action Plan**

*These Policies and Procedures are to comply with the HOME regulations noted above and are for the Crestview Subdivision being developed by the Greeley Area Habitat for Humanity (the Developer).*

### POLICIES

#### I. Sales Price and Subsidy

- A. The Developer can submit a HOME application and request HOME funds on behalf of their buyers that is the lesser of
  - 1. The gap in buyer purchase financing
  - 2. The total of City fees for water and sewer taps plus building permit fees

The GURA Board of Commissioners has determined this is the maximum direct subsidy to be offered to buyers in the Crestview Subdivision. Buyers must meet all qualifications of the HOME and Developer’s homeownership programs.

- B. The intent of the HOME investment is to reduce the price of the home and is hereinafter called the “direct subsidy” or “HOME investment”.
- C. The sales price of the HOME to be acquired using a HOME investment cannot exceed the New Homes HOME/HTF Purchase Price Limit (also known as the HOME Affordable Homeownership Limits) as set by the U. S. Department of Housing and Urban Development (HUD) on an annual basis. Further restriction on the sales price may be determined by the Developer to comply with its own homeownership program, but at no time can the sales price exceed the amount provided by HUD.

#### II. Affordability

HUD expects HOME funds to be utilized for affordable housing for households earning 80% or less of the Area Median Income (AMI) and for the home to remain affordable. To keep the housing affordable, regulations impose affordability requirements that stay with the property for a time period, called the “affordability period”.

- A. **Affordability Period.** The length of the affordability period is based on the amount of the HOME investment in the home to be purchased and is the period during which the property must remain affordable or the homebuyer is

subject to the return of the HOME investment. The table below shows HUD’s minimum affordability periods by HOME investment. The City has chosen to utilize the periods defined in the table and will not impose a longer period of affordability. Subrecipients, Owners, Developers, and Community Development Housing Organizations (CHDOs) cannot opt out of applying these policies to its homebuyer program and, further, must assist the City in enforcing the City’s Affordability and Recapture policy.

HOME Funds in Project	Affordability Period
<\$15,000	5 years
\$15,000 - \$40,000	10 years
>\$40,000	15 years

- B. **Enforcement of the Affordability Period.** There are two means by which the HOME investment is protected during the period of affordability and which will restrict the way in which the home can be used and sold, as outlined in these policies and protected by recorded legal documents. The diagram below provides a visual of the enforcement means, both of which are described by policy following the diagram.

Purpose: Maintain Affordability and Protect the HOME Investment	
Repayment	Recapture
100% of the HOME investment is subject to repayment if the home does not <b>retain affordability</b> throughout the affordability period. <b>Affordability</b> is defined by regulation and is stated in the policies for repayment below.	All or part of the HOME investment is subject to <b>recapture</b> if the home is sold, either voluntarily or involuntarily, during the period of affordability.
See III. Section A below for policy.	See Section B below for policy.

- C. **Affordability Term.** The affordability period begins after project completion. (“Completion” is defined as the date the activity is closed in IDIS.) Legal documents will designate the affordability term as 5 years, 10 years, or 15 years depending on HOME investment plus three months to allow the City time to draw the funds and close the activity.

### III. Policies to Retain Affordability

- A. **Repayment.** The HOME regulation at 24 CFR 92.503(b)(1) states, “Any HOME funds invested in housing that does not meet the **affordability** requirements for the period specified in 24 CFR 92.254 (Qualification as affordable housing: Homeownership) must be repaid by the participating jurisdiction.”

HUD defines **affordable** under the HOME program as meeting the following:

1. The housing must be single-family housing.
2. The housing must be modest, as follows:
  - a. Utilization of the HOME Affordable Homeownership Limits provided by HUD (annually) ensure this requirement.
3. The housing must be acquired by a homebuyer whose family qualifies as a low-income family, i.e. earning no more than 80% of AMI. (The Developer may further restrict income through its program policies.)
4. The housing must be the principal residence throughout the period of affordability.

To enforce the affordability regulation, the City will require prompt repayment of **all of the HOME investment** in the following instances:

1. The home is no longer the principal residence of the homebuyer. The homebuyer must occupy the home at all times and provide an annual residency certification to remain in compliance with affordability. Non-return of the annual residency certification is considered being out of compliance. Under the residency requirement, the following are not allowed:
  - a. Anything that causes the homeowner to not reside in the home, including leasing the unit to another household or transferring title to another household (for example through a Quit-Claim Deed).
2. Reconstruction of the home to accommodate multiple families (it must remain a **single-family** residence).
2. Misrepresentation of homebuyer's information (for example, it comes to light that family size or income were reported falsely).
3. The first mortgage is refinanced.

The City will secure the affordability period by a Beneficiary Use Covenant/Homeowner Agreement.

The City will exercise due diligence and make every effort, in conjunction with the Developer, to work with the homeowner to return the home to affordability compliance and avoid repayment of the HOME funds. Due diligence steps will include the following:

1. Through the Developer Agreement, the Developer shall be responsible for initially contacting the homeowner, reminding them of their obligations to Beneficiary Use Covenant/Homeowner Agreement, and will attempt to facilitate returning the unit into affordability compliance.
  - a. The Developer will send annual certification letters to the homeowners, which must be signed, dated, and return acknowledging continuation of principal residency.
2. If the homebuyer does not respond to the Developer, contact with the homeowner will be initiated by and for the City through the City Attorney's Office.
3. The Developer and City will work with the homeowner to return the property to compliance through the following:
  - a. Allowing a lease term to expire and continuing with the affordability after expiration (in the case where a home has been rented and a tenant has a lease). The affordability period will be extended past the affordability term by the length of any lease.
  - b. Providing reasonable time (determined by the City and the homeowner) to return the home to single-family status.
  - c. Allowing the homebuyer to sell the property under the recapture provisions below.

Misrepresentation or refinancing require repayment without a means to remedy.

4. **Remedy.** If the Developer and/or the City, through working with the homeowner, are not able to return the home to affordability compliance, the City will contact HUD with regard to the repayment of HOME funds to determine how they should be handled. Additionally, the City will take the following steps:
  - a. Per the terms of the Beneficiary Use Covenant/Homeowner Agreement, the City will pursue collection by whatever means are allowable under the law, the costs of which will be the responsibility of the homeowner(s).



EXAMPLE: The homeowner decides to voluntarily sell the property, and it subsequently sells for \$200,000. The homeowner repays all loans and closing costs (not including the HOME direct subsidy), which total \$150,000. The homeowner thus has net proceeds of \$50,000. The HOME direct subsidy was \$30,000. From the net proceeds of \$50,000, the City will recapture the HOME \$30,000 direct subsidy and the homeowner retains \$20,000.

- b. If a sale results in **less proceeds available than are required** to meet the demands of all liens, including the HOME direct subsidy, any amount available from net proceeds up to the amount of the remaining affordability loan. That amount will be considered full payment of obligations under the affordability/recapture agreement for the homebuyer.

EXAMPLE: The homeowner decides to voluntarily sell the property, and it subsequently sells for \$200,000. The homeowner repays all loans and closing costs (not including the HOME direct subsidy), which total \$175,000. The homeowner thus has net proceeds of \$25,000. The HOME direct subsidy was \$30,000. The entire \$25,000 will be recaptured from the homeowner to satisfy the HOME requirements; the homeowner will keep none of the net proceeds.

- c. **If there are no net proceeds** from the sale, repayment will not be required from the homeowner and the affordability period will be considered satisfied for that party.

EXAMPLE: The homeowner decides to voluntarily sell the property, and it subsequently sells for \$200,000. The homeowner repays all loans and closing costs (not including the HOME direct subsidy), which total \$200,000. The homeowner thus has \$0.00 net proceeds. The HOME direct subsidy was \$30,000, of which \$0.00 will be recaptured. Likewise, there will be not be net proceeds left for the homeowner.

- d. In the case of a short sale, the City (or the Developer, as applicable) has the option of whether or not to approve the short sale. Recapture will be based on net proceeds only, and follow the applicable provisions set forth above.

- e. Foreclosure.

- When the City and/or Developer are made aware of a pending foreclosure, they will to the greatest extent feasible provide the homeowner with resources, including counseling options, the Colorado Foreclosure Hotline information, and other guidance as is available.
- Recapture, in the case of foreclosure, is based on net proceeds alone. If there are no net proceeds, the affordability restriction is terminated and there is no further obligation to the homeowner or the City. (Subject to HUD approval, as noted above.)

3. Subject to HUD approval, the City will use any recaptured funds for other HOME-eligible activities.

4. The HOME Investment and recapture provisions will be secured through a Deed of Trust and Promissory Note. This is in addition to the Beneficiary Use Covenant/Homeowner Agreement that secures affordability and the repayment required if a homeowner is not in compliance with the affordability requirements.

- a. If the homeowner resides in the property for the full affordability period and meets all of the terms of the Deed of Trust, Promissory Note, and Beneficiary Use Covenant/Homeowner Agreement, the City will release all documents at its expense at the expiration of the legal documents.

## PROCEDURES

***It is recommended that the City and the Developer use the Procedures below as a checklist during the construction and subsequent sale of housing units. These procedures are only for implementing the recapture policies. Other procedures are noted in the Developer Agreement.***

Applications for HOME funds are available from the City year-round, as funds are available. Procedures below begin once an application has been approved for funding by the GURA Board of Commissioners.

1. Developer – Provide a written preliminary buyer financing worksheet that identifies a gap in available financing for the homebuyer.
  - a. City –Based on numbers, provide a preliminary, written HOME funds commitment to the Developer at which time HOME funds will be committed.
2. Developer - Articulate affordability requirements (repayment of funds) and recapture provisions to potential purchasers at various stages in the process.
  - a. City - Meet with the potential buyer(s) to review the Beneficiary Use Covenant/Homeowner Agreement, Deed of Trust, and Promissory Note to provide additional assurance that the buyer is aware of the affordability period and instances by which the HOME investment may have to be returned (repayment) or recaptured (sale) and the considerations and requirements of each scenario.
3. Developer – As construction completion nears, provide the City with closing information (per the Developer Agreement).
4. Developer – Finalize the buyer financing worksheet with final figures to determine the exact amount of HOME funds to be involved in the property.
5. City – Prepare the Beneficiary Use Covenant/Homeowner Agreement, Deed of Trust, and Promissory Note to secure the affordability period. Ensure the document is recorded following closing. The expense of recordation is the City's with regard to its legal document (HOME program expense).
6. City – At its expense, release the Beneficiary Use Covenant, Deed of Trust, and Promissory Note when the affordability period expires.

**Attachment 4 – Public Hearing and Public Comment Ads**