



**CITY OF GREELEY, COLORADO**

**CARES ACT FUNDS SUBSTANTIAL AMENDMENT  
TO THE 2020-2024 CONSOLIDATED PLAN and  
2020 ANNUAL ACTION PLAN**

Public Comment Period – July 15, 2021-July 20, 2021

Prepared by the Greeley Urban Renewal Authority  
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**CARES ACT SUBSTANTIAL AMENDMENT  
TO THE 2020-2024 CONSOLIDATED PLAN AND 2020 ACTION PLAN  
TO AMEND ACTIVITIES AND FUNDING FOR CDBG-CV 1 (FIRST ROUND)  
AND  
ADD COMMUNITY DEVELOPMENT BLOCK GRANT-CORONAVIRUS 3<sup>rd</sup> ROUND (CDBG-CV 3)  
FUNDS AND ACTIVITIES**

**Cares Act Background**

On March 27, 2020, the United States Congress passed the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136. The bill provided \$5 billion in Community Development Block Grant (CDBG) funds to rapidly respond to COVID-19. The U. S. Department of Housing and Urban Development (HUD) allocated \$2 billion of that the same day. This constituted the first round of CDBG-Coronavirus (CDBG-CV) funds. In the second round, \$1 billion was allocated to States and insular areas. The final (third round) \$2 billion was allocated on September 11, 2021. As an entitlement community, the City of Greeley was awarded \$493,277 in the first round of allocations and \$526,790 in the third (cumulative \$1,020,067). All funds must be used specifically to prevent, prepare for, and/or respond to the COVID-19 pandemic.

**First Substantial Amendment for CDBG-CV Funds**

A Substantial Amendment was prepared for the first round of funding and was submitted to HUD with four activities identified: Public facility support, including move and extend the Cold Weather Shelter; support the Personal Isolation Facility at Bonell; Emergency Rental Assistance; and program administration. The only activity outside of program administration to be implemented with the use of CDBG-CV 1 funds was the facility at Bonell; it continued to operate as the Non-Congregate Homeless Shelter at the Bonell Campus (Bonell Shelter) for vulnerable homeless persons after the Isolation Facility closed.

**Qualifying as a Substantial Amendment**

A Substantial Amendment to the City's Consolidated Plan/Annual Action Plan for use of its grants from the U. S. Department of Housing and Urban Development is required any time one of the following occurs:

1. A change is made to allocation priorities or the method of distribution of funds;
2. To implement an activity not previously described in the action plan, using funds from any program covered by the consolidated plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD; or
3. There is a change the purpose, scope, location, or beneficiaries of an activity.

**Proposed Substantial Amendments**

1. Add CDBG-CV 1 Priority D - Acquire and/or rehab a public facility to serve as a cold weather shelter, housing navigation center, or other type of day-use center/facility for persons vulnerable to contracting and/or spreading COVID-19.
2. Amend the activities and budgets for identified priorities, as noted in the table following. The Priority A and B activities and funding were combined to fund a shelter/isolation facility for vulnerable homeless persons (Bonell Non-Congregate Shelter). Remaining funds will move to Priority D. Program administration reduces slightly.

<b>CDBG-CV 1 Uses</b>	<b>Budget by Priority - Initial</b>	<b>Amended Budget Proposed</b>
<b>CDBG-CV 1 Award</b>	<b>493,277.00</b>	<b>493,277.00</b>
<b>Administration – (approximately 18% of an allowable 20%)</b>	<b>89,777.00</b>	<b>88,273.64</b>
Administration		
<b>Priority A</b>	<b>165,660.00</b>	<b>0.00</b>
Identified activity Priority A – Move and extension of Cold Weather Shelter		
Unidentified activities under Priority A		
<b>Priority B</b>	<b>37,840.00</b>	<b>180,003.36</b>
Identified activity under this priority – Personal Isolation Facility/Shelter services – Goal 1 Public Service; 75 people		
<b>Priority C</b>	<b>200,000.00</b>	<b>0.00</b>
Emergency Rental Assistance, COVID-19-related		
<b>Priority D</b>		<b>225,000.00</b>
Support the acquisition and/or rehab of new congregate Cold Weather Shelter, Housing Navigation Center, or other type of day-use center/facility with social distancing for COVID-19 – Goal 1 Public Facility; 100 people		

3. Add funding source: CDBG-CV 3 - \$526,790
4. Add CDBG-CV 3 Administrative budget and Priority A - Acquire and/or rehab housing for persons vulnerable to contracting and/or spreading COVID-19, particularly persons who are homeless or have other special needs.
5. Budget the CDBG-CV 3 funds in the following manner:

<b>CDBG-CV 3 Uses</b>	<b>Budget Proposed</b>
<b>CDBG-CV 3 Award</b>	<b>526,790.00</b>
<b>Administration – (14.65% of an allowable 20%)</b>	<b>76,790.00</b>
Administration	
<b>Priority A</b>	<b>450,000.00</b>
Support acquisition and/or rehab of existing buildings for multi-family housing for persons vulnerable to the spread of COVID – Goal 1 housing development; 75 people	

## **Analysis**

This proposal qualifies as a substantial amendment because it meets all of the three instances noted in the Qualifying as a Substantial Amendment section. The Substantial Amendment will be to the 2020-2024 Consolidated Plan and 2020 Annual Action Plan.

## **Meeting a National Objective**

The CDBG-CV funds allocated under the CARES Act must be used specifically for the preparation for, prevention of, and response to the COVID-19. All CDBG-CV activities must still meet a National Objective of the CDBG Program:

- Benefit low-and-moderate income people (minimum of 70% of the CDBG-CV grant)
- Aid in the prevention or elimination of slum or blight
- Meet an urgent need

## **Citizen Participation Requirements**

Substantial Amendments are required to follow the City's Citizen Participation Plan, which, under normal circumstances by City policy, requires a public comment period for the Substantial Amendment of 30 days and 10 days' notice of upcoming comment periods and public hearings. However, to more quickly implement the funds and activities of the CDBG-CV, HUD offered Consolidated Plan Requirement waivers associated with public comment periods and what constitutes "reasonable notice". (CPD Waiver dated March 31, 2020.) The City requested those waivers by email to HUD (headquarters and Denver office) April 30, 2020, with acknowledgement that the waiver request was received from Kathleen Burke, CPD Director in Denver on April 30, 2020. The City thus, amended its Citizen Participation Plan to the following:

- The 30-day comment period reduced to five days.
- "Reasonable notice" requirements are reduced from 10-days prior to the start of a public comment period/public hearing to five days.
- Virtual public hearings, to comply with federal and local orders (social distancing, stay-at-home, etc.) are allowable and how notice will be provided is a part of the Citizen Plan Amendment.

## **Consultation**

The consultations requirement for the Consolidated Plan were met prior to its submittal to HUD on March 31, 2020. However, due to the nature of the needs for which CDBG-CV funds are to be used, City staff notified non-profit agencies considered to be "CDBG Partners" with the City with regard to changes/additions being proposed. These agencies are the "boots on the ground" and work daily with low- moderate-income residents affected by COVID-19. Notification of the upcoming Substantial Amendment and request for comments/ideas was emailed to the partner group on May 21, 2021 with a request for response by June 1, 2021. Additionally the partner group was provided with the Substantial Amendment (on July 1, 2021) with request for comments by July 7, 2021. Any comments received from the City's CDBG partner group are included in the Substantial Amendment.

## **Citizen Participation**

The City is required to consult the public in the manner described in its Citizen Participation Plan, as amended, to address priorities added to the Consolidated Plan utilizing CDBG-CV. The Public was consulted in the following manner:

***These are subject to update, as they are for the most part future dates.***

1. The Substantial Amendment was available for review by the general public for a five-day period beginning 8:00 a.m. July 15, 2021 and ending at 5:00 p.m. on July 20, 2021. Notice of the comment period was provided through legal ads in the Greeley Tribune (published July 3, 2021 in English and Spanish) and on the City's website – [www.greeleygov.com](http://www.greeleygov.com).
2. The Citizens Committee for Community Development members were mailed the Substantial Amendment for comment on July 1, 2021 and asked to have comments returned by 5:00 p.m. July 20, 2021.
3. Two public hearings were held, per the City's Citizen Participation Plan.
  - A. GURA Board of Commissioners: Ad published July 3, 2021; public hearing date July 14, 2021 at 4:30 p.m.
  - B. Greeley City Council: Ad published July 10, 2021; public hearing date July 20, 2021 at 6:00 p.m.
4. Written comments on the Substantial Amendment were accepted during the comment period noted above or by comment at one of the public hearings.

### **Public Comment Received**

A five day public comment period was held from 8:00 a.m. July 15, 2021 through 5:00 p.m. July 20, 2021. The following comments were received.

- *Enter any public comments received here on change in use of funds and addition of additional uses.*

### **Approvals**

***The following approvals are anticipated.***

- Approval to recommend the Substantial Amendment to the Greeley City Council was given on July 14, 2021 by the GURA Board of Commissioners.
- Approval to the Substantial Amendment was given by the Greeley City Council on July 20, 2021.

### **References**

- City of Greeley Consolidated Plan for Years 2020 -2024 and 2020 Action Plan and Draft of the Substantial Amendment, link: [www.greeleygov.com/services/ehh/greeley-urban-renewal-authority](http://www.greeleygov.com/services/ehh/greeley-urban-renewal-authority)