



City of Commerce City,
Colorado

COMMUNITY DEVELOPMENT BLOCK GRANT

Amended 2017 Annual Action Plan

Prepared by
Community Development's CDBG Office

Originally Adopted
July 17, 2017
First Amendment July 1, 2019

City of Commerce City, Colorado
2017 CDBG Annual Action Plan
With July 1, 2019 Amendments

Executive Summary

AP-05 Executive Summary - 91.200(c), 91.220(b)

1. Introduction

An Annual Action Plan is required by the U.S. Department of Housing and Urban Development (HUD) from all jurisdictions receiving Community Development Block Grant (CDBG) funds. The City of Commerce City is submitting its second Annual Action Plan as part of the adopted 2016-2020 Consolidated Plan.

The 2017 Annual Action Plan (AAP) was developed in accordance with HUD guidelines 24 Code of Federal Regulations (CFR) Part 91.220. This document represents a cooperative effort between the City of Commerce City, the public, housing and service providers. It outlines the City's needs, goals, and strategies for the 2017 AAP program year and addresses citizen involvement, including information on available and potential resources. The priorities developed in this plan target a wide range of issues. These issues range from basic needs, such as the availability of affordable housing, to quality of life issues like improving public facilities to serve low and moderate income (LMI) residents.

The City of Commerce City will receive an estimated \$415,877 in CDBG funds during the second program year which runs from October 1, 2017 through September 30, 2018. The Community Development Department, CDBG Office oversees the administration of the CDBG program. The CDBG Office regularly involves other city departments to develop and accomplish the goals in the Consolidated Plan. The CDBG activities, which are outlined in the AAP, adhere to the three national objectives established by HUD:

- a) Activities principally benefiting low and moderate income residents;
- b) Aid in the prevention or elimination of slums or blight; and
- c) Meeting an urgent community need.

2. Summarize the objectives and outcomes identified in the Plan

In 2017, the City will undertake a variety of new initiatives and complete activities currently underway from the 2016 CDBG allocation. The first year the City dedicated 100% of the CDBG funds to high priority goals outlined in the 2016-2020 Consolidated Plan. However, the City's needs are numerous and additional projects are needed in the LMI community.

Therefore, CDBG allocations will be used to meet the needs of LMI individuals in six different ways in the new 2017 AAP.

- a) Sidewalk Installation and Repairs – This public facilities project is a continuation of the 2016 AAP project of installing and repairing sidewalks in the Target Area to improve accessibility, remove hazards, and achieve the City's goal of pedestrian connectivity throughout the City.
- b) Home Repair Program – A new home repair program will address the health, safety, accessibility, energy efficiency and structural integrity of owner-occupied homes through rehabilitation efforts.
- c) Support for Domestic Violence Victims - This is an expansion of an existing City program. Victims and their dependents will receive financial assistance for rent and utilities to escape their abuser.
- d) Recreation Activity Scholarships – This is an expansion of an existing City program. A 50% discount will be made available to LMI residents enrolling in city recreational activities;

3. Evaluation of past performance

The City became entitled in 2016, launching its first Consolidated Plan & Annual Action Plan in October of 2016. Nine months have passed since the inception of the CDBG program. The bulk of the work performed was in establishing the CDBG program through administration and planning.

The City wisely heeded HUD's advice and limited the number of projects to be administered during the first few years as an Entitlement Community. The number of 2016 projects to execute in the 2016-2020 Consolidated Plan was limited to properly establish a new CDBG Department and hire a full-time CDBG Coordinator.

Commerce City's past performance includes hiring a CDBG Coordinator and establishing the CDBG Division for the City. Subsequent to the hiring the Coordinator the City's Analysis of Housing Impediments was approved, the Citizen Participation Plan was amended, the 2016 Annual Action Plan was amended and

the 2017 Annual Action Plan was drafted. Drafts of the Uniform Relocation Act, Limited English Proficiency Plan and Section 3 Plan have also been produced.

Additional activities include establishing the Certifying Officers; financial account; IDIS set-up; inter-departmental CDBG Team; project evaluation and ranking criteria; expanding outreach strategies; collecting contacts and resources information, and the City's participation in the re-formation of the bi-monthly, Community Resource Meetings for the Adams County area.

The City's Public Works Department recently assigned a project manager to coordinate the sidewalk project with CDBG. Progress has been made in clearly defining the job locations in preparation for Request for Proposal (RFP) being released. The CDBG Coordinator and Public Works Project Manager are working closely to properly prepare the RFP package in accordance with Department of Labor and HUD requirements. It is yet to be determined if the environmental review process will be part of the RFP or if it will be done by the CDBG Coordinator.

The CDBG Office still needs to expand or accomplish the following:

- a) Coordination with the Commerce City Housing Authority's new Home Repair Program;
- b) Educate City Departments and staff on CDBG and its regulations;
- c) Growing the inter-departmental relationships for project management;
- d) Establishment of a formal process for project pre-application, pre-application consultation, and application;
- e) Expand the networking with area resources and potential applicants;
- f) Publication of a Fair Housing/Equal Opportunity webpage;
- g) Increase resource referrals by City staff to LMI residents in need;
- h) Establish methods to identify and evaluate un-met and/or growing needs within the City;
- i) Identify gaps in available services and resources; and
- j) Host focus group meetings with the medical, veteran, disabled, ESL, prison, finance, educational, and business communities.

Expanding the performance of the City's fledgling CDBG program is reflected in the 2017 AAP's increase in projects to meet the identified needs of the City's LMI communities.

The City works diligently to address the needs of the community by targeting CDBG funds to the most impactful projects and by leveraging other resources

through partnerships with service providers and the community. Since 2016, the City's Quality Community Fund has funded 52 different activities to meet the needs of disadvantaged residents. Most of these activities leveraged additional resources into the community.

4. Summary of Citizen Participation Process and consultation process

The City made a concerted effort to identify and meet the needs in the community when developing the 2017 Annual Action Plan. The CDBG spent several months speaking with senior and youth services, non-profit organizations, housing services, local businesses, neighboring governments, HUD staff, and key internal City departments. The goal of the consultations was to identify any needs not being adequately addressed. When needs were defined we worked together to coordinate resources and leverage funds.

A total of conducting 54 interviews, and 13 public/group meetings and initiating the online submission of Project Idea Forms (23 were received) were conducted during these early months in 2017.

The City worked attentively to obtain citizen project idea input and their views on potential projects. A wide variety of mediums were used to outreach to citizens in an attempt to get input from residents of all demographics. The types of outreach used included:

Project Input Meetings Two Public Input Meetings were to obtain feedback from residents regarding the City's Community Development Block Grant (CDBG) program, including current and future Annual Action Plans and Citizen Participation Plan. Fair housing laws and concerns were also discussed. The first was held at the Spanish speaking Catholic Church – Our Lady Mother of the Church on March 22, 2017. The second was at the Recreation Center on May 2, 2017. The handouts were in both English and Spanish. Plus, a Spanish interpreter was advertised and present at both meetings. Both meetings were published in the *Commerce City Sentinel* and *La Prensa de Colorado* two weeks prior to the meetings.

Group Meetings – Presentations were made at seven group meetings on the City's Community Development Block Grant (CDBG) program, including current and future Annual Action Plans and the Citizen Participation Plan. Fair housing laws and concerns were also discussed.

City Newsletter – All three meetings were published in the City's monthly newsletter – *Commerce City Connected*. This newsletter is delivered to each household in the City and is in English and Spanish. Plus, an informational announcement of the City's new CDBG program was printed.

Public Notification. A legal notice was posted in the local paper 30-days prior to the public hearing date. The notice informed residents of the public hearing to discuss the proposed 2017 Annual Action Plan and included a written public comment period to comply with the City's Citizen Participation Plan. The legal notice provided information on accessibility needs for people with disabilities, how to obtain information on special assistance, and contact information for Spanish speakers.

Public Hearing. The City held a public hearing on July 17, 2017. Thirty days prior to the hearing the public was invited to provide comments on the 2017 Annual Action Plan and its proposed projects/activities. City Council approved a Resolution allowing the submission of the 2017 Action Plan to HUD and allocating funds to specific activities. The public hearing was held at the City Council's Regular Meeting at Civic Center, an ADA accessible facility.

Opportunity was provided for public comment on the amendments to the 2017 AAP at the July 1, 2019 City Council meeting. comments were received.

City Website. The CDBG webpage was redesigned and updated to include: the 2016 AAP projects; the 2017 draft AAP; HUD videos; contact information; a CDBG history; announcements on the Public Input Meetings and the Public Hearing. To derive additional public input a web template called the Project Input Form was posted on the site to allow direct input of ideas for the public. The City's website uses Google translate to the information posted into 105 languages.

Facebook & Twitter Postings on all three of the Public Input Meetings and the Public Hearings were sent out two weeks prior to the meetings.

Neighborhood Outreach Barbeque These annual events are held in the northern and southern sections of the City. They were held on June 8th and one will be held on August 10th. At these fun events, held in area parks, free food and information booths are provided. The CDBG Office provided information on the Public Hearing, CDBG, and the possible funding projects. Fair Housing materials were also handed out.

Citizen Participation for the 2019 Amendment to the 2017 AAP. A legal notice was posted in the local paper 31-days prior to the public hearing date with the City Council to amend the 2017 AAP. The notice informed residents of the proposed amendments and invited written public comments. The legal notice provided information on accessibility needs for people with disabilities, how to obtain information on special assistance, and contact information for Spanish speakers. Additionally, the City's Website gave notice of the amendments and posted the

amendment to the 2017 AAP. Social media was also utilized include Facebook and Twitter.

At the second March of 2019 Public Input Meeting, the CDBG Office discussed amending the 2016-2018 AAPs to reallocate unspent funds. Attendees were given a form to rank their preferences on who should receive funding for the funding. The most voted for projects were the Home Repair Programs, especially the MHRP and the DVV project. The residential directory was discussed and the attendee still wanted to see the project completed in the future.

5. Summary of public comments

No written public comments were received during the 30-day review period of the 2017 Draft AAP.

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

Not applicable.

7. Summary

As the City enters into its second year of the 2015-2019 Consolidated Plan, it will continue to fund projects in compliance with the goals and objectives outlined in the Consolidated Plan. These projects are designed to meet an identified priority need. Collaboration between City departments, HUD staff, and outside agencies will be integral to the success in meeting the goals and priorities. Concerted efforts will continue to ensure Commerce City residents understand CDBG and have direct access to provide input on how the CDBG funds are spent.

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

Entitlement grant resources totaling \$415,877 are anticipated for the 2017 program year to provide decent housing, suitable living environments, and expanded economic opportunities. Commerce City seeks to use its CDBG Program funds to serve the needs of low- to moderate-income persons and households in partnership with capable agencies to include public and private partners, developers, financial lending institutions, and nonprofits. Below is a description of the anticipated funding for the CDBG Programs based on the allocation for the current program year.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 2				Expected Amount Available Remainder of ConPlan 2018-2020
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	
CDBG	Public-Federal	Public services Public Improvements Housing Economic Development? Administration Fair housing	\$?	\$0	\$386,340	\$	\$?

Table 1 - Anticipated Resources

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

Commerce City encourages sub-recipients to leverage other resources to further the impact of the CDBG funds. Monies dedicated to infrastructure improvements capitalize on ongoing City revitalization and capital improvement efforts. The City anticipates working with various area weatherization programs, senior services programs, fair housing organizations and City departments to leverage funding into the housing, public service and public improvement CDBG projects.

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

Commerce City has a publicly owned small business center located in the Derby area. This center can help address the economic development and anti-poverty needs addressed in this plan. The City also has a public detention pond at the dog track site which may be used in connection with planned drainage improvements in the area.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

In 2019, amendments to the 2017 AAP became necessary when it was determined the Bus Stop, Residential Directory and Fair Housing projects could not be accomplished in a timely manner. Therefore, their combined amount of \$64,000 was reallocated to the active 2018 Minor Home Repair Project. The remaining 2017 projects are listed below.

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Sidewalk Construction and Repair	2017	2018	Non-Housing Community Development	Target Area	Neighborhood Revitalization	\$100,000	Public facility or infrastructure other than low/moderate income housing benefit: .34 miles of sidewalk
2	Home Repair Program	2017	2018	Affordable Housing	Citywide	Preserve & Expand Affordable Housing; Neighborhood Revitalization	\$101,121	Homeowner housing rehabilitation: 16 units
3	Public Services	2017	2018	Non-Housing Community Development	Citywide	Public Services Supporting Low/Mod Income & Special Needs Populations	\$ 36,951	Assist domestic violence victims and their dependents escape the violence and avoid homelessness: 92 people assisted
4	Public Services	2017	2018	Non-Housing Community Development	Citywide	Public Services Supporting Low/Mod Income & Special Needs Populations	\$ 7,000	Provide discounted registration fees to LMI residents for City Park, Recreation and Golf sponsored activities: 150 persons assisted
5	Administration & Planning	2017	2018	Non-Housing Community Development	Citywide	Administration & Planning	\$77,268	Other

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	Sidewalk Construction and Repair
	Goal Description	Construction of new sidewalks and repair of existing sidewalks to facilitate pedestrian connections and counter blight conditions.
2	Goal Name	Home Repair Program
	Goal Description	To help homeowners make needed home repairs to meet health, safety, weatherization, and other rehabilitation needs.
3	Goal Name	Domestic Violence Victim Support
	Goal Description	To provide temporary housing & utility financial support to victims of domestic violence and their dependents
4	Goal Name	Recreation Activity Scholarships
	Goal Description	Promote and provide a registration fee discount to LMI residents to enroll in City programs, activities and competitions.
5	Goal Name	Administration and Planning
	Goal Description	Administration and planning functions associated with the CDBG grant.

Table 3 - Goal Descriptions

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects planned for the 2017 program year are identified below. Additional details are provided in Section AP-38.

Projects

#	Project Name
1	Sidewalk Construction and Repair
2	Home Repair Program
3	Domestic Violence Victim Support
4	Recreation Activity Scholarships
5	CDBG Program Administration & Planning

Table 4 – Project Information

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

Each of the allocation priorities were developed based on input received from the community, including citizens and representatives from nonprofit agencies, housing providers, homeless housing and service providers, fair housing advocates, community development organizations, City staff, and others. Recent US Census and ACS data, visual inspections by City staff, the needs of special populations, and non- housing community development needs also guided allocation priorities.

All of the listed projects meet a high priority need, goal and objective as outlined in the Strategic Plan of the City's 2016 Consolidated Plan. By supporting and funding these projects, the City is addressing several underserved needs of our community.

Damaged and broken sidewalks are pedestrian hazards and produce accessibility problems for elderly and the disabled. Repairing these sidewalk segments removes the hazards and poor accessibility, reduces the appearance of blight, and increases home values. Additionally, safe travels throughout the City's neighborhoods will encourage fitness, health, and a sense of community.

Proper sidewalks exemplify a standard of care, pride of ownership, and perhaps most importantly leadership. This work will foster a ripple effect of positive property maintenance within the private sector. This will help meet the identified need of city beautification and staving off blight conditions.

The City's rapid growth rate escalates and intensifies the identified needs. The growth rate 2014-2015 was 3.6%, ranking 28th in the nation according to the US Census calculations of *Population Change for Incorporated Places of 50,000 or More*. From 2015-2016 the City ranked 81st with a growth rate of 2.3%. As the City grows it becomes more culturally diverse. The City strives to diversify its outreach efforts and continues to publish its materials in English and Spanish.

The relentless increase in the costs and shortage of housing in the Commerce City and the Denver Metro Area is largely caused by: the extreme population growth rate, the construction defect laws enacted in 2008, the current construction of a commuter rail line through Commerce City, and the legalization of marijuana in 2014.

The City also recognizes the hidden population of undocumented immigrants. Using the 2014 population estimate showing an additional 3.8% of statewide residents as undocumented¹, the City has 2,085 additional undocumented residents. Utilizing the person per household average of 3.15, an additional 662 homes are needed to house these residents within the City. All of these conditions amplify the pressures on LMI residents when finding decent and affordable housing within their price range.

To avoid compounding the loss of available affordable housing, the City seeks to assist LMI homeowners remain in their homes. LMI homeowners at risk of losing their homes because of financial pressures, accessibility issues, or unsafe living conditions may benefit from the Home Repair Program. The program will preserve existing affordable housing stock. As these rehabilitated homes are sold, a supply of decent, safe, and relatively affordable housing will enter the market.

All of the allocated funding amounts are based on the City receiving the same amount of 2016 CDBG funding which amounted to \$386,340. Should the City receive more than the estimated amount of funding, the excess will go to the Sidewalk Construction and Repair project. If any of the projects should withdraw or reduce their funding request, the remaining funds will go to the Home Repair

¹ *Undocumented immigrant workers number 140,000 in Colorado*, Pew estimates
By ALDO SVALDI | The Denver Post | PUBLISHED: November 3, 2016
<http://www.denverpost.com/2016/11/03/pew-undocumented-immigrant-workers-number-140000-in-colorado/>

Program. If less funding is received, the reduction in funding will be to the Sidewalk construction and Repair project.

There are numerous obstacles in forming and implementing the City's new Home Repair Program. Forming the multi-step process will take expertise the City does not currently possess. The City will hire an experienced consultant to help with the Home Repair Program's delivery. Marketing, environmental requirements, educating residents, and the weighty administration requirements will challenge the City's existing resources. However, decent, safe and affordable housing is the largest identified need in community and this compels the City staff's involvement.

As a result of the growth of the City, there has been a corresponding growth in services and resources available to LMI residents. However, knowing how to access these services is uncommon and rare, even among industry specialists. This lack of information dissemination was frequently identified during the citizen participation process in both the Consolidated Plan and the AAPs.

The Recreational Scholarship Program will assist LMI residents meet their physical, mental, and perhaps job training endeavors. Job training skills through recreational programs include classes in: photography, cooking, computer skills, ESL, GED, driver safety, and archeology. Expanding this discounted enrollment program will help meet increasing LMI registration demands on the rapidly growing City, especially when the City opens its second recreation center in 2018. Marketing the scholarships may be an obstacle to implementing this program.

Numerous qualified funding requests were made for CDBG public service programs. Two major restraints prevented the City from funding all of these important requests: the 15% budget cap imposed by HUD and the limited administrative staff. Balancing the advice of HUD with the needs to be addressed, the City limited the total number of projects to fund to eight. This represents a large 167% increase in services to City residents; however, all of the Subrecipients are City Departments. This will ease the administration duties during the City's second year as a direct CDBG recipient. Overwhelming the CDBG Office with additional projects is a possible obstacle the City is willing to overcome.

Finally, all of the submitted projects were evaluated and ranked based on the Consolidated Plan's identified needs, the largest impact of each dollar per resident, and how it fits into the City's adopted plans.

AP-38 Project Summary

Project Summary Information

1	Project Name	Sidewalk Construction and Repair
	Target Area	Census tract 87.09, 87.05 and 89.01 Census tracts 87.09, 87.05, 87.06, 88.01, and 89.01
	Goals Supported	Public Infrastructure Improvements
	Needs Addressed	Public Infrastructure Improvements, Slum & Blight Abatement
	Funding	\$123,630
	Description	The removal and replacement of broken sidewalks; new sidewalk construction
	Target Date	9/30/2018
	Estimate the number and type of persons that will benefit from the proposed activity	400 persons per week, all ages, from surrounding neighborhood
	Location Description	In the Adams Heights, Adams City, Fairfax Park, Memory Lane Gardens, Tichy and Kemp neighborhoods
	Planned Activities	Remove large sections of broken & damaged sidewalk and replace them. Install new sidewalks as needed
2	Project Name	Home Repair Program
	Target Area	Citywide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve & Expand Affordable Housing, Neighborhood Revitalization
	Funding	CDBG: Amount \$101,121
	Description	Owner-occupied, housing rehabilitation for LMI residents
	Target Date	9/30/2018
	Estimate the number and type of persons that will benefit from the proposed activity	16 owner-occupied homes will be rehabilitated; approximately 50 residents
	Location Description	Citywide

	Planned Activities	Rehabilitation of owner-occupied homes to meet health & safety, weatherization, energy efficiency and structural needs
3	Project Name	Domestic Violence Victim Support
	Target Area	Citywide
	Goals Supported	Assist those at risk of homelessness; Crime prevention and awareness
	Needs Addressed	Financial support to provide emergency assistance to domestic violence victims, and their dependents, to escape the abuser
	Funding	\$36,951
	Description	Temporary, limited financial support to pay for housing and utilities for the victims, and their dependents, through the Police Department's Victim Services Department.
	Target Date	9/30/2018
	Estimate the number and type of persons that will benefit from the proposed activity	Using an estimated \$1,250 per family and the City's average per household multiplier of 3.1 approximately 92 people will be assisted.
	Location Description	Citywide
	Planned Activities	Direct payment of rent, mortgage or hotel rooms to house the escaping victims. Direct payment of utilities at their housing location, as necessary. Provide or refer needed services to assistance the family's long-term escape of the abuser.
4	Project Name	Recreation Activity Scholarships
	Target Area	Citywide
	Goals Supported	Fund community services including youth activities, programs for seniors, crime prevention, and employment training
	Needs Addressed	Support LMI and special needs residents
	Funding	\$7,000
	Description	Provide a 50% registration fee discount to LMI residents to enroll in the City's Park, Recreation and Golf sponsored activities, memberships and competitions.
	Target Date	9/30/2018
	Estimate the number and type of persons that will benefit from the proposed activity	150 LMI residents of all ages will benefit

	Location Description	The activities, memberships and competitions would take place at City recreation centers, parks, pools, area sport fields, the Buffalo Run Golf Course, the Senior Center, area sport centers and facilities.
	Planned Activities	Discounted fees for dance, family activities, special events, educational classes, fitness facilities, gymnastics, martial arts, older adult activities, outings, special interests, sports, swimming, youth & teen activities, and golf activities. Additionally the discounts will apply to: recreation center memberships, daily admissions, and sports leagues and camps
5	Project Name	CDBG Program Administration & Planning
	Target Area	Not applicable
	Goals Supported	Not applicable
	Needs Addressed	Not applicable
	Funding	\$77,268
	Description	The City will use CDBG funds to carry out activities associated with program planning, administration, and management to comply with CDBG requirements.
	Target Date	9/30/2018
	Estimate the number and type of persons that will benefit from the proposed activity	Not applicable
	Location Description	7887 E. 60th Avenue, Commerce City, CO 80022
	Planned Activities	Staff, consultants, outreach, education, supplies, plans, and office costs associated with the administration and planning of the CDBG programs to be in compliance with CDBG regulations.

Table 5 - Project Summary Information

AP-50 Geographic Distribution – 91.220(f)

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

The City of Commerce City is an entitlement community located in southwestern Adams County, northeast of Denver and adjacent to Denver International Airport. The City surrounds the Rocky Mountain Arsenal National Wildlife Refuge on three sides and is generally bound on its western edge by the South Platte River. The City and County of Denver is the City's southern border. The cities of Brighton, Thornton and Westminster are adjacent to the northwest. The City's area is approximately 40 square miles.

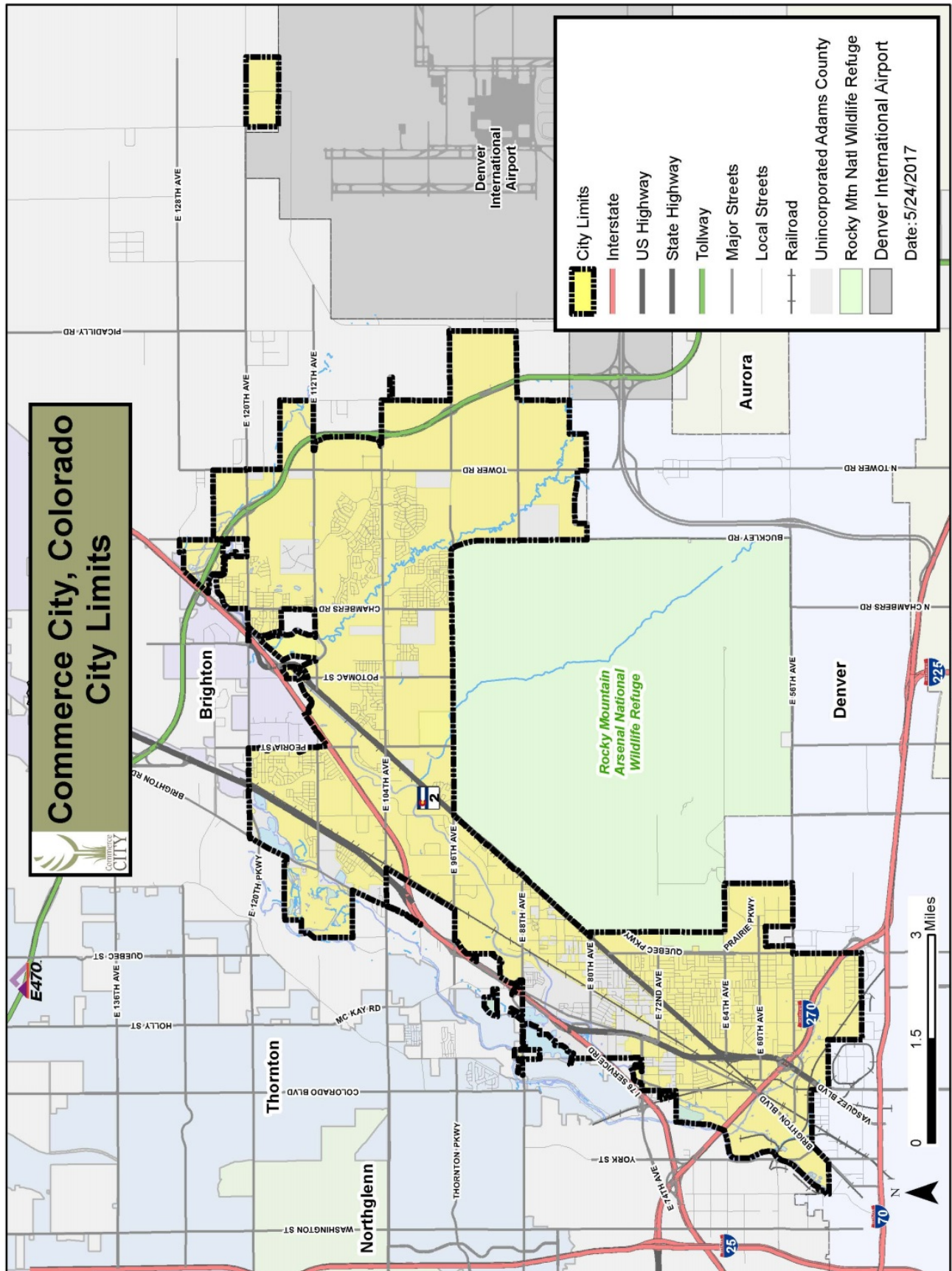
Commerce City's thriving industrial economy depends on Commerce City's rich transportation connectivity with: Denver International Airport; federal and state limited access expressways including: I-70, I-76, I-270, E-470, US6, US85, CO2, CO44, CO224, and CO265; plus, three very active railroad lines. As these transportation features travel through and around the City, they create numerous, isolated pocket neighborhoods.

Commerce City, Colorado – General Map

The following three maps depict:

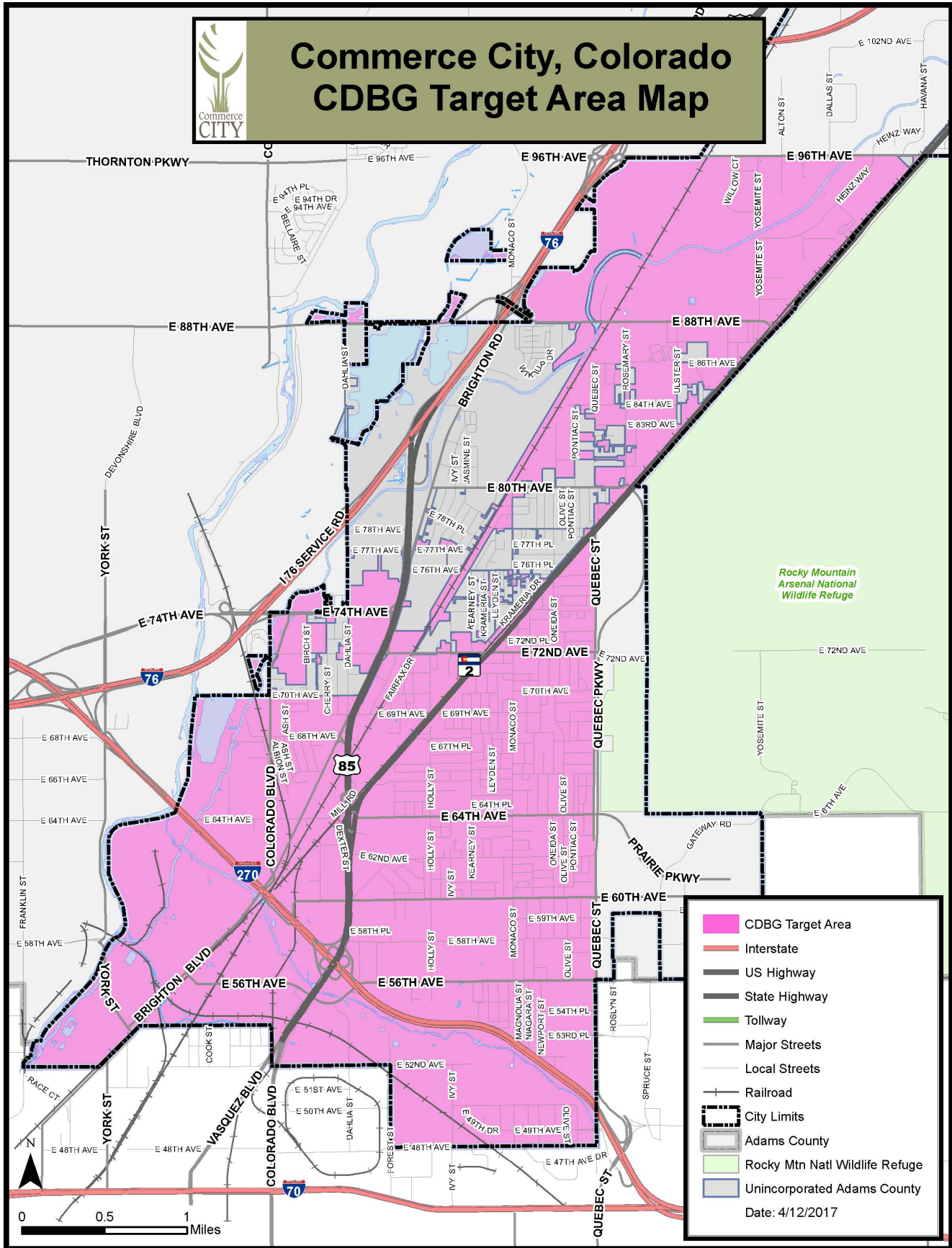
1. Commerce City Limits
2. Commerce City's CDBG Target Area
3. Commerce City's Census Block Group LMI Census Block Groups

The areas shaded on the latter two maps will be prioritized for allocation of CDBG resources. However, individual low- and moderate-income persons residing anywhere in the City may be eligible beneficiaries of CDBG funds.

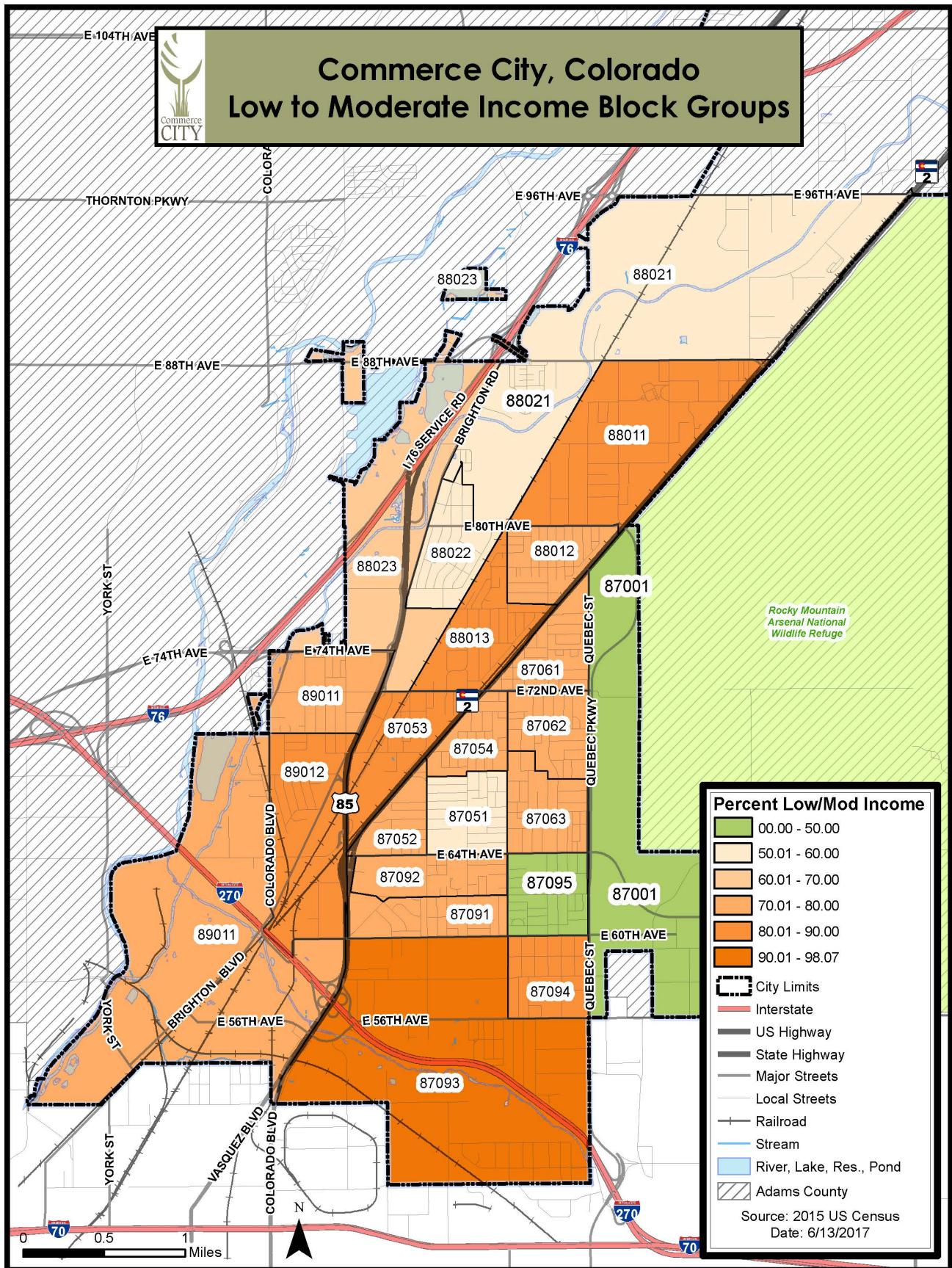




Commerce City, Colorado CDBG Target Area Map



Document Path: \\gisprod\Projects\2017\Maps_4_CDBG\TargetArea.mxd



Geographic Distribution

Target Area	Percentage of Funds
Historic City	80%
Citywide	20%

Table 6 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Commerce City has identified a Target Area south of 96th Avenue, East of Hwy 2 and Quebec Street, then south and west to the City boundaries. This section of the City comprises a higher percentage of low-income individuals, minorities, and older homes in need of major repairs. The Target Area contains Census Tracts of 87.05, 87.06, 87.09, 88.01, 99.02 and 89.01. It is referred to as the Core City and the Historic Center of the City.

Most of the public facilities and housing rehabilitation needs identified in the Consolidated Plan are located in the Target Area. Sidewalks are required to the use of the HUD National Objective - Low-Moderate Income Area threshold benefit to qualify for CDBG funding. Therefore, the work performed will be within the Target Area where the highest amount of LMI residents live.

Most the housing rehabilitation work will take place in the Target Area, due to the income of the residents and the age of the homes. The Public Services being funded, such as the Domestic Violence, Recreational Scholarship, programs do not have geographic boundaries per se. These services and benefits will be dispersed throughout the City to benefit LMI residents.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Commerce City is committed to the goal of providing decent, safe, and affordable housing and improving the quality of life and economic viability for its residents. The need for affordable rental and homeownership housing was a common theme heard during the Consolidated Plan and both AAPs development processes. The greatest identified needs are among renters with very low incomes, large families, immigrant families, senior residents, and residents with disabilities.

To address these needs, the City will to grow its capacity and implement affordable Home Repair Program starting in 2017 Program Year. In later years, the City may use grant funds for public infrastructure improvements or other site improvements to support neighborhood revitalization, housing development and/or additional rehabilitation of affordable housing units.

Goals for the number of households to be supported in 2017 program year are provided below. The City expects to continue its CDBG investment in affordable housing in future program years.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	16
Special-Needs	0
Total	0

Table 7 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through...	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	16
Acquisition of Existing Units	0
Total	16

Table 8 - One Year Goals for Affordable Housing by Support Type

Discussion

The City recognizes, and the Consolidated Plan describes in detail, a high priority need for the preservation and expansion of affordable housing. With the hiring of a full-time CDBG Coordinator in 2017, Commerce City has further developed its program management capacity. Therefore, future investment in affordable housing programs can occur in 2017 Program Year.

The Home Repair Program (HRP) will provide grants up to \$5,000 to rehabilitate approximately 16 owner-occupied homes. The City expects to engage the services of a CDBG home repair consultant to assist in the launch and daily operations of the new Home Repair Program. This program will prioritize the repair work based on improving the safety, health and accessibility of the residents in their homes. Educational and referral components of the HRP will also be offered

for homeowners to provide useful tools for the long-term maintenance and repairs of their homes.

To further meet the housing needs in the City, the CDBG Office is coordinating with the Commerce City Housing Authority (CCHA). CDBG and CCHA will work together to complement each other's program and make and streamline the application process for LMI homeowners. This cooperation would include marketing, possible process streamlining, and applicant referrals.

The HRP would process each applicant and execute up to \$5,000 grant for home health, safety, accessibility and structural improvements. During this time, the applicant may also be directed to the CCHA. The CCHA has a larger housing rehabilitation loan program with an estimated limit of approximately \$20,000. The CCHA will perform their own loan application evaluation and either accept or deny the applicant.

The CDBG program anticipates performing 16 rehabilitation grant projects through this method, with many LMI owners being accepted for further rehabilitation work through the CCHA loan program. If the CCHA runs out of Home Repair Loan funding, the CDBG Office will design and launch a home repair loan program with a \$20,000 limit to serve approximately 5 homes.

AP-60 Public Housing – 91.220(h)

Introduction

Commerce City residents are served by both the Adams County Housing Authority (ACHA) and the Commerce City Housing Authority (CCHA). ACHA is the larger of the two organizations and owns 42 units of public housing, has an ownership stake in another approximately 1,500 units of affordable housing, and administers 1,498 Housing Choice Vouchers.

The CCHA has ownership interest/partnerships in 229 affordable housing units throughout Commerce City and administers approximately 110 Housing Choice Vouchers.

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

The CCHA is not covered by a PHA Plan and is not subject to a HUD review or designation of this type. However, over the next year, the CCHA will endeavor to address the needs of subsidized and affordable housing in Commerce City by:

- At the end of 2016, the CCHA increased its staff to assist in the numerous projects they facilitate.
- In the spring of 2017, the CCHA partnered with private developers to develop a 212-unit affordable housing development. Completion of the construction on this project is anticipated to be in 2018.
- Evaluating CCHA's properties to ensure efficient and effective use.
- Continue to examine possibilities to expand the voucher program to help address current unmet housing needs in Commerce City.
- Support efforts by the City's Neighborhood Services Division to strengthen enforcement of code violations thereby improving the health, safety and livability of area neighborhoods.

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

Over the coming year, the CCHA plans to take the following actions toward increasing the self-sufficiency and involvement of its residents:

- Collaborate with partners to educate residents about home ownership and mortgage programs and practices.
- Examine opportunities for CCHA to support existing residents to develop important skills and resources.
- Meet with, and reach out to, residents and resident leaders to better understand and respond to needs and goals.
- Support programs which encourage all residents to become active and involved within their community, including self-awareness of their surroundings and crime prevention.

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

The CCHA is not covered by a PHA Plan and is not subject to a HUD review or designation of this type. The ACHA is designated a "High Performer" based on its 2014 score report in the Public Housing Assessment System, with maximum scores for the agency's financials, management, and capital fund health. The following table provides a score breakdown by indicator:

Public Housing Assessment System (PHAS) Score		
Report Date:	1/13/2014	
PHA Code:	CO058	
PHA Name:	Adams County Housing	
PHAS Indicators	Score	Max
Physical	39	40
Financial	25	25
Management	25	25
Capital Fund	10	10
Late Penalty Point(s)	0	
PHAS Total Score	99	100
PHAS Designation	High Performer	

Table 9 – ACHA Scores

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

This section identifies actions Commerce City will take over the next year to address homelessness and other special needs. The 2016-2020 Consolidated Plan, considers these needs as a high priority need. The City will continue to explore opportunities to support area non-profits serving the homeless of Commerce City.

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

Over the next year, the City will:

1. Provide expansion funding to the Commerce City/Brighton Police Department's joint Victim Service Unit (VSU). The VSU provides domestic violence victims, and their dependents, with emergency assistance to escape the abuser. This temporary, emergent, financial support through the VSU, pays for housing and utilities costs. Half of the 531 victims assisted in 2016, needed financial assistance to avoid homelessness. The CDBG funding will expand the assistance provided to approximately 29 households (92 residents) who are domestic violence victims.
2. The Home Repair Program helps owners afford to stay in their homes. The HRP will also include homeowner education and resources to help owners maintain and afford their home, thereby avoiding homelessness.

Additionally, the increased equity in their home increases their economic standing.

In 2006, the City formed the Quality Community Foundation (QCF), a 501(c)3, to improve the quality of life for Commerce City resident by serving people and agencies. Each year dozens of applicants seek funding, several of them to alleviate homelessness.

In 2017, the City funded \$140,000 of the QCF's budget, provided staff to run the foundation, and supported the City appointed QCF Board. The City also sponsors two annual fundraisers for the QCF. Early in 2017, the foundation awarded \$145,000 to 27 non-profit agencies serving the residents of the City.

The following non-profits where funded by the QCF to prevent and/or assist the homelessness.

1. Access Housing received \$4,000 to help homeless families regain their independence and self-sufficiency. They anticipate helping 25 persons with the funding.
2. Almost Home received \$7,500 to provide housing assistance for the homeless and those in need. They anticipate helping 73 persons with the funding.
3. CASA of Adams & Broomfield Counties received \$7,500 to advocate for abused and neglected youth in search of permanent homes. They anticipate helping 65 persons with the funding.
4. Catholic Charities and Community Services of the Archdiocese of Denver, Inc. received \$4,000 for emergency assistance to individuals and families to prevent homelessness. They anticipate helping 77 persons with the funding.
5. Mercy Housing Mountain Plains received \$5,300 to create stable, vibrant, and healthy communities by developing, financing, and operating affordable, program-enriched housing for families, seniors, and people with special needs to lack the economic resources to access to quality, safe housing opportunities.

Additionally, in 2017, the QCF prevented and/or assisting the homeless by funding three food banks (\$17,200); six medical and mental health non-profits (\$37,829); six educational and job readiness/training programs (\$25,500); and two family assistance programs (\$5,500).

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

The City will continue to support and fund efforts by local nonprofit organizations through the QCF.

It will also support Adams County in providing outreach and case management services by assessing individual needs and linking them with appropriate county services.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City, the QCF, and the CCHA will provide referrals to homeless persons or residents at-risk of being homeless. The City assistance in re-establishing Community Resource Network group will also improve delivery of services and resources to the homeless and residents at risk of becoming homeless.

The City of Commerce City will continue to partner with local nonprofit organizations to expand emergency and transitional housing for homeless persons. The City will also continue to seek out new partnerships with, nonprofits, faith based organizations, the school districts, and other community programs.

While these resources currently exist in the City, stakeholder input and the Homeless PIT count indicates demand surpasses the availability of emergency and transitional housing. Commerce City will work with Adams County and surrounding municipalities to identify opportunities to address homelessness collaboratively.

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

In Commerce City, Access Housing operates a rapid rehousing program designed to shorten the time individuals and families experience homelessness. It also seeks to help homeless families make the transition to permanent housing through its Home Again Family Support Program and to live independently through its STEPS Success Self-Sufficiency Program.

In 2017 the City established a closer working relationship with Access Housing staff and will continue to seek to expand housing opportunities and services for homeless persons, including those making the transition to permanent housing.

Additional connections being explored in 2017-2018 are Community Uplifting Partnership's (CUP) counseling and job training programs, increased employment education opportunities at the City's Small Business Development Center, increasing the volunteer base through joint marketing, and GRID Alternatives installing solar service to their three homeless transitional housing. As new opportunities surface, the City will continue to provide Access Housing with the information and available resources.

Additional efforts will be made to further network with and assist Almost Home, CASA of Adams & Broomfield Counties, Catholic Charities and Community Services of the Archdiocese of Denver, Inc., and Mercy Housing Mountain Plains.

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

In addition to identifying homelessness as a priority need, the 2016-2020 Consolidated Plan identified the need for additional affordable housing. The City of Commerce City and the Commerce City Housing Authority will continue to work with local partners to: develop additional affordable housing units, reduce living expenses, providing emergency services to domestic violence victims, coordinate medical assistance, and senior resources.

The City will also develop potential opportunities to support rapid rehousing and homelessness prevention efforts in conjunction with local housing and service providers including Volunteers of America, Colorado Coalition for the Homeless, Inter-Faith Community Services, Homeless No More, STRIDE, Adams County HHS, Commerce City and Adams County Housing Authorities.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

According to the following articles in *The Denver Post*:

Affordability isn't just about home prices, but about the ability of incomes to keep pace and the cost of borrowing money."

Especially concerning is diminishing affordability in counties where lower- and middle-income households sought homes to fit their budgets. **In Adams County, the median price of a home sold this year reached \$285,000, up 14 percent, the highest rate of increase among the dozen counties.**

Home purchase costs, which consumed 35.6 percent of average incomes historically in Adams County, **are now eating up 43.8 percent of the average weekly wage.**²

And...

... the median price of a home sold in Adams County dropped from \$184,000 in the summer of 2006, the last market peak, to \$145,000 in late 2011. But in the first quarter of this year, the median was up to \$290,000, **a doubling in a little over five years**, according to ATTOM's numbers.³

Housing affordability is a key issue affecting the entire Denver area, including Commerce City, and is driven primarily by supply and demand. Between 2015 and 2016, ACS data shows Commerce City's population grew by 2.3% to an estimated 54,869. Between 2010 and 2016 Commerce City's population increased by 19.5% (ACS-QuickFacts). Despite this intense population growth, the addition of new housing units has not kept pace, resulting in a scarcity of housing which has, in turn, driven up prices.

Based on Commerce City's average household size of 3.15 people, the City's 54,869 residents would require approximately 17,419 housing units, however, between 2011-2015 ACS estimates the figure was 15,508, a shortfall of over 1,911 units or 11.0%. When you add the hidden estimated population of 2,085

² *Northern Front Range is an Epicenter of Rising Home Unaffordability; Low Affordability has Colorado Housing Markets Skating on Thin Ice*

Rapidly rising mortgage rates could put homes out of reach next year for many

By ALDO SVALDI | The Denver Post | PUBLISHED: December 21, 2016

³ *7 of the 12 counties in the U.S. where relative home affordability is at its lowest level are along the Front Range.*

By ALDO SVALDI | The Denver Post | PUBLISHED: March 30, 2017

undocumented immigrants, another 662 homes are needed for a total of 2,747 units.

This need for affordable housing was borne out in comments from Commerce City residents in public meetings and other settings during the Consolidated Plan process. The legislative restraints on home builders and legalized marijuana increasing the population were cited as reasons.

Residents frequently cited concern about rapidly increasing housing costs, reporting anecdotal examples of rents increasing 50% from one year to the next. Subsidized housing, especially apartments for seniors, seldom has vacancies. The waiting lists for the Housing Choice Vouchers in Commerce City have been closed since 2014.

Adams County's 2015 Analysis of Impediments to Fair Housing Choice included a review of public policies and the effects of those policies on housing availability. This analysis concluded neither: local building codes, planning, permitting, nor development review processes posed significant barriers to housing development in the County or in its cities.

However, development-related costs (land costs, labor, materials, tap fees, impact fees, and the costs of assuaging NIMBY sentiments particularly directed at multifamily housing) were determined to have a significant negative effect on development of new housing.

In the Spring of 2017, the CDBG Coordinator and CCHA Coordinator met with the CEO and Director of the Denver Area Habitat for Humanity. Habitat reported Commerce City was the **most** expensive place to build new homes in the Denver Metro Area because of the exorbitant tap fees. These tap fees are controlled by the South Adams County Water & Sanitation District. This District is completely outside of the City's control. Therefore, the City has no control of the water tap fees.

Stakeholders interviewed in the course of preparing this plan also cited Colorado's construction defect laws as contributing to the lack of affordable multifamily housing supply. The well-intentioned state laws were designed to protect homebuyers from defective housing construction. But by allowing class action lawsuits from as few as two homeowners against a builder or other construction industry professional, the industry has all but stopped producing multifamily housing due to the high risk of litigation and the associated costs of insurance against such legal claims. Where multifamily housing is being constructed, it typically must exceed a \$400,000 per unit price point in order to cover the builder's insurance costs.

The 2017 Legislative Session Colorado State Legislature entertained six Construction Defect related bills to rectify this serious problem. Only one bill passed, HB17-1276, and was signed by the Governor. It will become law effective August 9, 2017. This law is a modest step in bringing about the needed changes to once again bring about the robust and safe growth in Colorado's housing industry. The City will continue to monitor and support future bills which repair the damage done to the housing construction industry.

The Denver metro area's staggering growth rate over the past five years out paced the entire nation. Time is needed for the market, especially the crippled construction industry, to catch up to the housing demand.

A comparison of the 2010-2015 DMA's growth rate is below. A full listing of the 50 most populous city growth rates are in the article cited below⁴:

Rank	City	% Change 2010-2015
1	Denver	11.6
5	Miami	9.1
9	Portland	7.4
15	Phoenix	7.2
30	San Diego	6.4

Table 10 – National Population Growth Rates

Even though the country's population growth has slowed and the dramatic influx of population from the legalization of marijuana has leveled off, the City's growth rate continues to hold steady. The housing pressures resulting from this growth is a serious concern to the City.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

Commerce City will continue to follow specific policies outlined in its Comprehensive Plan designed to increase affordable housing options in the jurisdiction. These citywide policies include:

⁴ **Chart: Denver tops U.S. city population gain rate in 2015**

By Joe Murphy | PUBLISHED: May 19, 2016 | UPDATED: July 8, 2016

<http://www.denverpost.com/2016/05/19/chart-denver-tops-u-s-city-population-gain-rate-in-2015/>

- **Rehabilitated Homes** (Citywide Policy HN 1.1) The preservation of existing housing stock (rental and ownership housing) and its rehabilitation helps prevent loss due to deterioration. This ensures homes will remain available to working families. Rehabilitated homes should be evaluated for environmental hazards. Identified hazards (e.g., lead-based paint, friable asbestos) will be mitigated before houses are re-occupied.
- **Variety of Housing Types and Mixed-Uses within Neighborhoods** (Citywide Policy HN 2.1) Encourage new neighborhoods containing a mix of housing types, ranging from single-family detached, attached, townhomes, apartments, lofts, and housing for special needs (e.g., seniors). Site plans should include a mix of lot sizes, development densities, as well as housing types and styles, with high-density and multi-family housing near collector and arterial streets, transit, and services.
- **Neighborhoods for Mixed Incomes** (Citywide Policy HN 3.1) New neighborhoods should contain a range of housing priced at different points for mixed incomes, to achieve overall diversity.
- **Affordable Housing Options Maintained** (Citywide Policy HN 3.3) Continue to support existing affordable housing options, partnerships, and programs to address the continued maintenance of the City's affordable stock, including existing maintained mobile home parks in the Historic City; multi-family housing; and affordable, small, single-family homes. Future affordable housing will be located throughout the community near jobs and services, so pockets of low-income housing do not occur.

Discussion:

Affordable Housing is one of Commerce City's three strategic housing-related goals appearing in the City's C3 Vision Plan. In addition to promoting a mix of housing types and price ranges the plan specifically calls for:

"...housing that is affordable, not only to buy or rent but also that is cost-efficient and healthy to live in, is important to enable more residents to live near where they work to allow them to become economically self-sufficient."

The plan prioritizes affordable housing accessible to transit.

Detailed strategies, goals, and outcome indicators for each of the affordable housing-focused policies listed above are contained in the City's C3 Vision Plan. In 2018, the City will be hiring a consulting firm to update the City's Comprehensive Plan.

The Adams County 2015 Analysis of Impediments identifies three action steps being undertaken at a county level to combat development-related factors limiting affordable housing. These steps include:

1. General community education on the need for and importance of affordable housing;
2. Offering training for housing industry representatives on the benefits of building neighborhoods with diverse housing types; and
3. Maintaining a countywide inventory of potential multifamily development sites.

The City will work with Adams County to the extent possible to assist with these three steps.

AP-85 Other Actions – 91.220(k)

Introduction:

This section details the City's actions to help ensure safe, decent, quality, affordable housing for Commerce City residents.

Actions planned to address obstacles to meeting underserved needs

To help remove obstacles to meeting underserved needs and improve service delivery, Commerce City will: facilitate the development of regional social service collaborations to coordinate the work of social service organizations; disseminate news and information; spearhead community-wide solutions to local needs; spearhead coordinated solutions to local needs; and reduce service duplication across nonprofit agencies.

Actions planned to foster and maintain affordable housing

The City will foster affordable housing with the awarded federal resources. The City will utilize several strategies including:

1. Provide future CDBG funding to support homeowner rehabilitation, repair, accessibility, and weatherization programs;
2. Seek out non-profit and other government programs for funding, consultation, and cooperation to reduce blighted housing units within the City;
3. Seek out non-profit and other government programs for funding, consultation, and cooperation to improve neighborhoods, and foster economic development to increase the economic standing of the City's residents;
4. Increase the supply of affordable housing units through targeted redevelopment;
5. Gather and disseminate information on area resources to help residents meet their financial needs and unanticipated costs such as medical visits; and
6. Participate in the Consolidated Plan development process to ensure coordination with broader community strategies.

Actions planned to reduce lead-based paint hazards

As part of the City's new Home Repair Program, renovated properties which contain lead-based paint will be identified and addressed in accordance to the

Residential Lead-Based Point Hazard Reduction Act of 1992, and/or Title X, Sections 1012 and 1013, of the Housing and Community Development Act of 1992, related regulation of the EPA and OHSA, and Regulation No. 19 of the Colorado Air Quality Control Commission.

It is anticipated the City will contract with nonprofit agencies dedicated to the evaluation and abatement of lead-based point in housing constructed before 1978. Additionally, the City and these entities will provide property owners with educational information regarding the hazards of lead.

Grant administration staff will review the actions taken by the hired agencies and ensure supporting documentation is in place for the compliance with the Lead-Safe Housing Rule Requirements as identified in 24 Code of Federal Regulations Part 35.

For non-CDBG funded properties, the City will make referrals, as needed, to the state health department for lead screenings.

Actions planned to reduce the number of poverty-level families

ACS estimates the City's 2016 poverty level is 15.6%. Of the City's 13 Census Tracts, six of them have LMI percentages ranging between 50.72% through 98.07%. All six of these tracts are located in the Target Area.

The City will continue its identification and development of areas with older homes in need of significant repairs, concentrated racial and ethnic areas, and lower income families to continue to allocate entitlement funding there. As funding and expertise is available, the City will promote job training, employment services, small business, and micro enterprise development through partnerships with local colleges, local trade schools, chambers of commerce, faith-based organizations, incubators, and business development centers.

Actions planned to develop institutional structure

The reformation of the Community Resource Network (CRN) will help overcome gaps in services and reduce unnecessary service duplications. The CRN resumes June 28, 2017 at the City's Recreation Center, co-hosted by the CDBG Office, Access Housing, Kids First, and Tri-County Health.

In 2016, the City formed the CDBG Team. The Team is comprised of numerous divisions and departments including: Planning, Building, Neighborhood Services, Economic Development, Public Works, Parks, Recreation & Golf, Housing Authority, Communications, City Manager's Office, and Finance. This team guides the AAP process providing expertise, insight and experience within the

community. This is the City second year in preparing for CDBG funding. This newly formed CDBG Team works diligently to avoid any institutional gaps while providing citywide interdepartmental cooperation and guidance.

Actions planned to enhance coordination between public and private housing and social service agencies

The City will continue to collaborate, through dissemination of services, news, and information, across to social service organizations, subcontractors, public and private entities. The City will encourage and seek-out community-based solutions and regional partnerships.

The City will work with local governments, public and private housing and social service agencies to enhance coordination in the implementation of the Consolidated Plan. Some of the actions the City will take may include:

1. Initiating the Community Resource Network for the Adams County Area will amass area non-profits, governmental agencies, faith-based organizations, financial, business, volunteer groups, etc. serving the Commerce City area. At these meetings, each organization can provide written materials, meet other organizations, network, and learn about existing services. The Community Resource Networking group resumes June 28, 2017 at the City's Recreation Center, co-hosted by the CDBG Office, Access Housing, Kids First and Tri-County Health.
2. Coordinating and communicating with agencies to identify needs and foster solutions within the community.
3. Offering technical assistance to agencies on sources of funding available, associated timelines, applicable regulations, and the most impactful uses of funds.
4. Participating in regional efforts and meetings with public and private housing, educational entities, economic development organizations, social service agencies, and other governments.
5. Offering free pre-application meetings for property owners considering rehabilitation as described under the Project Section.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction:

The City will work diligently to ensure the CDBG program adheres to the specific statutory and regulatory requirements set for the program. Commerce City is a new entitlement and began this first program year with no program income on hand.

The estimated percentage of CDBG funds used for activities benefiting persons of low and moderate income over the one-year period covered by this 2017 Annual Action Plan is 80.00%.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income is available for use that is included in projects to be carried out.

- | | |
|---|------------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | \$0 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan | \$0 |
| 3. The amount of surplus funds from urban renewal settlements | \$0 |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan. | \$0 |
| 5. The amount of income from float-funded activities | \$0 |
| Total Program Income | \$0 |

Other CDBG Requirements

- | | |
|---|-----|
| 1. The amount of urgent need activities | \$0 |
|---|-----|

2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit – A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan: 80% during 2017 AAP

Discussion:

As Commerce City begins its second program year as an Entitlement Community, no program income was produced. Neither are there any outstanding Section 108 loan guarantees, grant funds returned to its line of credit, or float-funded activities.

The City does not expect to receive surplus funds from urban renewal settlements. At this time, no CDBG funds are planned for urgent need activities.

The City will ensure the program-specific requirements for the CDBG program are satisfied and policies and procedures are in place to maintain ongoing compliance.

Because of the sidewalk repair and replacement program being a LowMod Area National Objective 100% overall LMI benefit will not be possible. The City estimates an 80% overall LMI benefit during the 2017 AAP project year.

For the Attachments, please contact the City's CDBG Office at csteinberg@c3gov.com.