



City of Commerce City,
Colorado

Draft

2020

Annual Action Plan

Prepared by the
Department of Community Development's
Community Development Block Grant Office

October 5, 2020

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

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

This 2020 Annual Action Plan (AAP) is in accordance with HUD guidelines 24 Code of Federal Regulations (CFR) Part 91.220. This year's CDBG funded activities are outlined in the AAP. They adhere to at least one of the three national objectives established by HUD:

1. Activities principally benefiting low- and moderate-income residents;
2. Aid in the prevention or elimination of slums or blight; and
3. Meeting an urgent community need.

This document represents a cooperative effort between the City of Commerce City, its residents, area businesses, and non-profits serving the Commerce City area. It outlines the City's needs, goals, and strategies for the 2020 AAP funding year and addresses citizen involvement. The projects developed in this plan target a wide range of issues. The projects include affordable housing, quality of life issues, crime prevention, neighborhood revitalization, and helping seniors maintain their homes.

The City of Commerce City received \$419,175 in CDBG funds to utilize during its fifth program year, which runs from October 1, 2020, through September 30, 2021. This represents a 2.2% decrease in funding from the 2019 program year, based on an annual HUD funding algorithm. Exactly 20% of the grant funding is apportioned for the administration of the annual grant. The City's Community Development Department-CDBG Office administers the CDBG program.

Each year the CDBG Office provides community outreach and CDBG education; develops, and reviews project applications; prepares the AAP and year-end CAPER; and prepares individual project RFPs, contracts, agreements, and project environmental reviews. The CDBG Office provides grant recipients with technical assistance, guidance, and oversight; approves project spending; and prepares financial drawdowns from HUD. Once each project is ready to proceed, the CDBG Office enforces compliance with labor laws, Section 3, fair housing and equal opportunity laws, 2 CFR 200, and the Uniform Relocation Act. Additional reporting, tracking, training, and general administrative duties are performed. The CDBG Office regularly relies on assistance from Legal, Communications, IT/GIS, Commerce City Housing Authority, and CD Administration to help perform the CDBG Office Duties.

The CDBG Office also manages the Home Repair Programs (HRPs). The CDBG Office serves as the point of contact for interested residents. Coordination between HRPs and each individual applicant is managed through the CDBG Office and the Minor Home Repair Program contractor.

2. Summarize the objectives and outcomes identified in the Plan

Each year, the City dedicates 100% of the CDBG funds to high priority goals outlined in the 2016-2020 Consolidated Plan (ConPlan). In the 2020 AAP, the City will further address the home rehabilitation needs outlined in the ConPlan by continuing two HRPs. Four non-profit subrecipients will help address the needs of low- to moderate-income (LMI) residents. To continue preventing homelessness and reducing crime the City will again fund the Police Department's award-winning DVV program.

All six of the proposed 2020 AAP projects meet the identified needs of LMI residents.

Home Repair Programs (MHRP and PAT)

Minor Home Repair Program (MHRP): A continuing program to address the health, safety, accessibility, and energy efficiency of LMI owner-occupied, single-family homes through rehabilitation work.

Brothers Redevelopment, Inc., Paint-a-Thon Program (PAT): A continuing program to provide exterior paint and yard clean-ups for the disabled and/or seniors homeowners. BRI advertises, promotes, and qualifies applicants, then equips and organizes the volunteers for each project home. The CDBG funds will purchase the paint and supplies to paint the exterior of the home, improve exterior accessibility, and perform yard clean-ups.

Both the HRPs listed above will help improve the:

1. health of the home's occupants,
2. safety of the home,
3. value and economic security of the home,
4. ability of seniors to age in place,
5. accessibility to the disabled,
6. energy efficiency of the property, and/or
7. ability of residents to stay safer in their homes during the pandemic

Public Services Supporting Special Needs Populations and Youth Focused Activities

Audio Information Network of Colorado (AIN): A continuing program to provide bi-lingual audio information services for residents who cannot see and/or read. The free services include equipment, in-home setup and training, in-home and remote troubleshooting, equipment maintenance and studio technology upkeep, and ongoing program preference monitoring. The vendor also provides low-cost internet.

Kids in Need of Dentistry (KIND): A new applicant to the CDBG Program they will serve low-income children in the community through a new tele-dentistry program. In response to COVID-19, KIND will increase their tele-dentistry abilities with additional staff, at-home dental kits, equipment, and software.

Senior Hub: A new project to the CDBG Program they will provide three prepared and packaged meals per week for seniors at the Mercy Housing Holly Park (MHHP) apartments. The meals are prepared onsite and delivered by local residents and volunteers. Senior Hub will also offer Senior Tech classes to assist with social media and online communication to alleviate isolation.

Public Services Supporting Homelessness and Crime Prevention

Support for Domestic Violence Victims (DVV): A continuing program and a COVID-19 based expansion of an existing City program. Victims and their dependents will receive temporary financial assistance for housing and utilities to escape their abuser. This reduces repeat abuse and prevents homelessness.

3. Evaluation of past performance

Commerce City with other public, private and non-profit community housing providers and community development service agencies, have made significant contributions to provide safe, decent and affordable housing in the jurisdiction. There has been considerable progress made, however addressing homelessness, improvements to public infrastructure, public facilities, economic opportunities and the need for more affordable housing remain some of the most prolific issues facing the city, as documented by the current Consolidated Plan and the 2018 Consolidated Annual Performance and Evaluation Report (CAPER).

The Consolidated Plan is a comprehensive document that describes the City's housing market conditions, identifies the need for affordable housing and community development, and provides strategies to address the needs over a five-year period. The CAPER provides an assessment of progress towards the five-year goals and the one-year goals of HUD entitlement grant CDBG. The evaluation of the City's performance is summarized in the annual CAPER report. The most recent 2018 CAPER reported these accomplishments:

Public Service – Domestic Victims Violence Support Program (DVV)

The DVV Program uses CDBG funding to assist the victims at risk of becoming homeless due to the abuse and violence they endured. The DVV Program solely utilized CDBG funds to make the direct temporary support payments. Using CDBG funding, the DVV has assisted 195 people in 62 households since the commencement of the DVV program two years ago. The award winning DVV program is regarded as a successful program.

Home Repair Programs (HRPs)

The HRP's consist of three different programs, the Minor Home Repair Program (MHRP), Paint-a-Thon Program (PAT), and the Weatherization Program (WP). The MHRP and PAT programs were launched on January 28, 2019. During the first 20 months of the HRP programs, 109 applications were received and 56 homes have been assisted, 23 are in the application process, and 30 were ineligible. The need and request for these programs remains strong and the program is regarded as successful.

Public Facilities - Sidewalks and Ramps

During 2019 - 2020, the CDBG Public Work's sidewalk projects purchased the necessary easements and installed over 1,775 feet of new sidewalks and 12 ADA compliant ramps. The Central, Kemp and Rose Hill neighborhoods received the new sidewalks and ramps.

Public Facilities - Economic Development - Small Business Resource Center (SBRC) Renovations

Renovations to the SBRC began in September of 2019 and were completed in October of 2019. Upgrades to the classroom lighting, conference rooms, display equipment, the Wi-Fi system, and phone system were installed.

Public Service - Economic Development - SBRC Staffing

The City began to receive proposals by contractors in the summer of 2019. The final interviews were held in August and the new contract employee started work in mid-October. The new staff person increased the activities and courses with our partners: Adelante, the Denver Metro Small Business Development Center and the Colorado Minority Business Office. Numerous bilingual small business resource materials were produced and bilingual outreach was increased. When the pandemic hit, the SBRC staff person produced bilingual informational materials, assisted with the establishment of the city's first small business loan program, and provided one-on-one instructions for grant/loan funding applications. The SBRC staff person and partners have assisted 50 business clients and 138 people have attended webinars and workshops.

4. Summary of Citizen Participation Process and Consultation Process

The CDBG Office established new and continued community outreach contacts with CDBG related entities who serve Commerce City residents. Outreach consisted of 9 presentations, 50 meetings and interviews, 181 individual conversations with city residents, and 3 booths at area events. Additionally, 65 non-profit organizations received the *CDBG Program Update* Newsletter to receive project updates, encourage project applications/ideas, and networking opportunities for the 2020 AAP.

5. Summary of public comments

All comments were considered by the CDBG staff and incorporated into the 2020 AAP where possible. To see a summary of comments made by the public see the attachments.

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

All comments and views received in the 2020 AAP citizen participation process were considered. Project ideas not incorporated into the 2020 AAP include community gardens, beautification of the right-of-ways in the Target Area, building affordable housing, and providing charging stations for electric cars. The decisions not to incorporate any comments or ideas was typically based on the lack of a qualified funding applicant, the timing of the project, the administrative capacity of the CDBG Office, ineligibility, or because it was outside of the 2016-2020 Consolidated Plan Goals.

7. Summary

As the City enters into its fifth and final year of the 2016-2020 Consolidated Plan, it will continue to fund high priority projects in accordance with the goals and objectives outlined in the Consolidated Plan. Please see the goal accomplishment table below.

2016-2020 Consolidated Plan Identified Goals	2016	2017	2018	2019	2020
	Funded In				
Neighborhood Revitalization (Core City)					
- Street, Road or Sidewalk/ADA Improvements	X	X			
- Neighborhood Clean-ups				X	X
- Demolition & Clearance of Blighted Property					
- Drainage Improvements					
Housing Needs					
- Elderly Housing					
- Homeowner Rehabilitation/Repair		X	X	X	X
- Energy Efficient Improvements			X	X	X
Economic Development					
- Employment Training			X	X	
- Financial Assistance for Small Businesses			X		
- Business Incubator					
Public Services					
- Youth/Senior Activities/Community		X	X	X	X
- Crime Prevention/Drug Abuse Education		X	X	X	X
- Homeless Prevention		X	X	X	X
Fair Housing Activities	X	X	X	X	X

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

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

Agency Role	Name	Department/Agency
CDBG Administrator	COMMERCE CITY	Community Development Department - CDBG Coordinator

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information

Cheryl Steinberg, CDBG Coordinator - csteinberg@c3gov.com - 303-289-8168.

AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

This section describes the City consultation outreach efforts for the 2020 AAP.

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

In April of 2020, the CDBG Office joined the Commerce City Services Alignment Group (CCSA). This organization is comprised of eight local, regional, and national real estate, health, dental, orthodontic, and mental health organizations with a focus on children and families. Their goal is to establish the Commerce City Community Campus (C4) at the former Adams County Human Services building. Their purpose is “Incorporating individual, cultural, social, and psychological factors, and providing care with basic human dignity and choice to decrease healthcare costs and improve quality of life; is critical to improve outcomes”. The CDBG Office’s role is to provide technical support and coordination for CDBG funding opportunities and to learn more about community needs.

In September of 2019, the CDBG Office established contact with the Salude Medical Clinic. Printed CDBG program resource materials were provided to the clinic for distribution to its patients.

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

The CDBG office consults with the Commerce City Housing Authority, Access Housing, Almost Home, and Star Girlz – local homeless services and housing providers – to assess the current needs of homeless persons and persons at risk of homelessness in Commerce City. Funding applications to the CDBG program are explained and encouraged. The existing CDBG DVV program works directly with the CDBG Office for funding needs to prevent homelessness.

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

The City of Commerce City does not receive an Emergency Solutions Grant (ESG) funds.

2. Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities

The following list represents all contacts made by the CDBG Office to other organizations from August of 2019 through September of 2020. The bolded organizations are new contacts during this period.

1. **A Precious Child**
2. Access Housing
3. Adam County 14 School District
4. Adams County Aging Network
5. Adams County Community Development
6. **Adams County Head Start**
7. **Adams County Homeless Coalition**
8. Adelante Community Development
9. Almost Home
10. Anythink Library – Commerce City
11. Arapahoe County Weatherization
12. ARC of Adams County
13. Audio Information Network of Colorado
14. Brother’s Redevelopment/Colorado Housing Connects
15. City of Thornton – Community Connections
16. City of Westminster
17. Colorado Access
18. Colorado Cross-Disability Coalition
19. Colorado Inspires
20. Commerce City Active Adult Center
21. **Commerce City Alignment**
22. Commerce City CDBG Team
23. Commerce City - City Council
24. Commerce City Communications Division
25. Commerce City Economic Development Division
26. Commerce City Housing Authority
27. Commerce City Neighborhood Services Division
28. Commerce City Parks, Recreation & Golf Department
29. Commerce City Planning Division
30. Commerce City Police Department – YHOP and DVV
31. Commerce City Public Works Department
32. Community Advocate Council
33. Community Choice Credit Union
34. Community First
35. Community Reach Center
36. Community Resource Network – Connecting for a Better Community
37. Community Uplift Partnerships
38. Cultivando
39. Denta Quest
40. Denver Metro Fair Housing Center

41. Downtown Derby District
- 42. Early Childhood Partnership of Adams County**
43. Elevations Land Trust
44. Families First
45. Family Tree
46. Groundworks Denver
47. Growing Home
48. Habitat for Humanity
49. Innovage
- 50. Invest in Kids – Nurse Family Partnerships**
51. Kids First Health Care
52. KIND - Kids in Need of Dentistry
- 53. Leadership Commerce City**
54. Let Your Light Shine
- 55. Maiker Housing Partners**
- 56. Our Lady Mother of the Church Catholic Church**
57. PASCO - Personal Assistance Services of Colorado
58. Project Angel Heart
59. Quality Community Fund
- 60. Salude Medical Clinic**
61. Senior Hub
- 62. Services de La Raza**
- 63. South Adams County Fire Protection District**
- 64. Saint Vincent de Paul Society – Commerce City**
65. Star Girlz
- 66. Suncor Boys and Girls Club**
67. The Senior Hub
- 68. Together Colorado**
69. Tri-County Health Department
70. Urban Land Conservancy
71. Urban Land Institute

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

There were no agency types not intentionally consulted, however due to the COVID-19 shutdowns the CDBG's outreach efforts were stifled. Fortunately, the majority of the outreach efforts occurred prior to the pandemic. In 2021, with the formation of the 2021-2025 Consolidated Plan, wide outreach efforts will be made and extra efforts will be made to include as many of the missed organizations for previous years. The CDBG Office intends to organize focus groups, interview, and residential surveys to provide CDBG outreach, education, and to receive input.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Metro Denver Homeless Initiative	MDHI's CoC application identifies policies and practices related to homelessness and organizations that provide homeless services and housing. This report informed the Market Analysis and the Strategic Plan homelessness strategy.
City of Commerce City Housing Needs Assessment	City of Commerce City and CCHA	Provides current C3 data, current housing overviews, identifies barriers to affordable housing plus housing gaps and deficiencies. Identified the need for housing diversity.
2018/2019 Commerce City Balanced Housing Plan & CC	City of Commerce City and CCHA	Identified goals and strategies to implement housing diversity, affordability, and opportunities. Provides ideas for homelessness reduction.
CCHA Strategic Plan	Commerce City Housing Authority (CCHA)	The CCHA identifies five goals that directly overlap with the Strategic Plan, including: (1) Preserve and enhance the number of quality affordable homes; (2) Examine opportunities for new affordable housing development in all areas; (3) Develop additional services and opportunities to promote self-sufficiency for residents; (4) Work with partners to develop and meet common affordable housing goals; and (5) Continually strive for an excellent and professional Housing Authority.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
C3 Vision Comprehensive Plan	City of Commerce City	The C3 Vision Plan provides a blueprint for city decision-making and a regulatory framework for the City through 2035. The plan outlines guiding principles for housing, economic development, redevelopment, infrastructure, and parks and open space. For each of these elements, the community vision expressed in the Comprehensive Plan may be furthered using CDBG funds.
Station Area Master Plan	RTD and City of Commerce City	The Station Area Master Plan (STAMP) provides a vision, planning framework, and urban design concept for the new E. 72nd Avenue Commuter Rail Station and the Adams City and Adams Heights neighborhoods that surround it. STAMP identified CDBG as a potential funding source for streetscape improvements, creation and retention of affordable housing, and anti-displacement initiatives. The Strategic Plan priorities and goals reflect these STAMP goals.
2016-2020 Consolidated Plan	City of Commerce City	This plan provides guidance in goals, planning, and actions to be taken in meeting the City's housing, economic development, neighborhood revitalization, public works, and public service needs.
2019 Economic Profile	City of Commerce City	This report provides several key economic indicators for Commerce City, including population growth, employment by industry, labor force and unemployment statistics, top employers and employment centers, transportation system indicators, cost of living, and housing costs. This report provided background information for the development of Strategic Plan priorities and goals, particularly related to economic development.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
QCI Stakeholder Group Report	Commerce City Quality Community Initiative	The QCI Stakeholder Group's report recommends potential capital projects and funding strategies to meet long-term needs in Commerce City. Recommended projects included four roadway improvements, development of community parks, improved and new recreation centers, drainage improvements and maintenance, a new police substation in north Commerce City, and a cultural arts center and museum. These recommendations informed the development of Strategic Plan goals and policies related to public infrastructure and facility improvements.
Historic Preservation Plan	City of Commerce City	The preservation of historic sites, buildings, and activities within the City.
Walk.Bike.Fit	City of Commerce City	Sidewalks, recreational pathways, bus transportation connectivity within the City of Commerce City.
Youth Master Plan	Commerce City Youth Commission	Identifies the early childhood development, youth development, educational, health, safety, and community needs of the youth within the City.
Analysis of Impediments to Fair Housing Choice	Adams County/Commerce City	Housing, market, and economic analysis. Neighborhood revitalization.
New Mile High Greyhound Park Redevelopment Plan	City of Commerce City	Developer's plans to redevelop the former Mile High Greyhound Park.
2016 Housing & Community Development Survey	City of Commerce City	This report summarizes the 210 surveys submitted for the 2016-2020 Consolidated Plan.
Public Art Master Plan	City of Commerce City	Neighborhood revitalization
Irondale Neighborhood and Infrastructure Plan	City of Commerce City	Plans for changes to land use and upgrades to roadways, drainage and utilities.
Derby Neighborhood Plan	City of Commerce City	Neighborhood revitalization and area public services.

Table 2 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

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

Advertisements for the public meetings targeted the general public, low and moderate income households, racial/ethnic minority concentrations, and persons with limited English proficiency. The City utilized numerous outreach efforts. This year the CDBG Office established 15 new organizational contacts to improve the spread of CDBG information to residents. The CDBG Office continued their outreach by co-sponsoring and presenting at numerous Community Resource Network of Adams County and sending *CDBG Program Update* newsletters to CDBG participants and stakeholders. Additional outreach efforts included placing outreach information in the City's monthly *Commerce City Connected* bilingual newsletter to every City household, posting on the City's website, Facebook, Twitter, and NextDoor accounts, plus on Channel 8.

Advance notice was given to residents through announcements in the local English and when possible Spanish newspapers, *Commerce City Connected* bilingual newsletter, the City's website, and social media channels. At the public input meetings, bilingual PowerPoint presentations were given, with bilingual handouts, and a hired interpreter was present at both dates. An additional public input meeting was held in April of 2020 specifically around the needs and concerns of preventing, preparing for and responding to COVID-19.

When the CDBG Office began holding virtual meetings during the day, the attendance increase three-fold. This was assisted by our bilingual Communications Division personally inviting Spanish speaking local organizations to participate in the process. The first virtual meeting was held to specifically discuss the prevention, preparation for and response to the COVID-19 pandemic. Poll questions and the Chat screen were utilized to facilitate the meeting. To better accommodate our residents, the second Public Input Meeting was held twice, once in Spanish and once in English.

Dates, times, and locations for the workshops and focus groups are shown below, additional meeting information is in the attachments.

Bilingual Public Input Meeting #1

Tuesday, February 4, 2020
5:00pm – 7:30pm
Civic Center
Room 2108
7887 E. 60th Avenue
Commerce City, Colorado

Bilingual Public Input Meeting - COVID-19 Focused

Zoom Virtual Meeting
Wednesday, April 15, 2020

10:30am – 12:00pm

Public Input Meeting #2 - English

Zoom Virtual Meeting
Wednesday, August 12, 2020
10:30am – 12:00pm

Public Input Meeting #2 - Spanish

Zoom Virtual Meeting
Thursday, August 13, 2020
10:30am – 12:00pm

City Council Public Hearing

Zoom Virtual Meeting
Monday, October 5, 2020
6:00pm – 9:00pm

On October 5, 2020 a presentation at the City Council regular meeting explained key plan components. A public hearing was then held to receive comments. [REDACTED] comments were received and considered from the public prior to the adoption of the 2020 AAP.

Each public comment and idea was considered, responded to, and incorporated into the 2020 AAP where possible. For example, the positive feedback from the DVV and HRP programs, including waiting lists were considered when refunding those programs. The improved broadband services comment is being addressed in the AIN project.

Citizen Participation Outreach

Additional information can be found in the attachments.

Table 3 – Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of Attendance/Response	Summary of Comments Received and Responses
Public Meeting #1	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Residents in the Target Area	9 attendees, all were residents.	The following needs were determined at the meeting: DVV HRPs Assisting Seniors Increasing Public Outreach (1 on 1 level) Additional Public Services
Virtual Public Input Meeting – COVID-19 Focused	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Residents in the Target Area	9 attendees, 3 residents, 4 non-profits, 2 employees	Poll question results: What projects should receive COVID-19 funding (top 3) 1st Assistance to the vulnerable (food, supplies, etc.) 2nd Improve private property to allow resident to remain in their homes 2nd Small business assistance
Virtual Public Meeting #2 - English	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Residents in the Target Area	10 attendees, 2 residents, 5 non-profits, 3 employees.	Results for Poll on the top projects: 1st DVV 2nd Rent/Mortgage/Utility Assistance 3rd AIN HRPs Senior Hub Groundwork Denver

Mode of Outreach	Target of Outreach	Summary of Attendance/Response	Summary of Comments Received and Responses
Virtual Public Meeting #2 - Spanish	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Residents in the Target Area	12 attendees, 7 residents, 4 non-profits, 1 employee.	Results for Poll on the top projects: 1st DVV 2nd AIN 3rd Rent/Mortgage/Utility Assistance Small Business Assistance
City Council Public Hearing	Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community	TBD	TBD
Website Outreach	Non-English Speaking - Google Translate - over 200 languages Non-targeted/broad community Entire City	Continually updated with information on CDBG projects.	Received 3 Project Idea Forms.
<i>Commerce City Connected</i> monthly bilingual newsletter	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community Every household in the City	This bilingual, monthly newsletter is mailed to every household in the City. Public input was requested and meeting notifications were placed in the newsletter numerous times.	Over 181 calls and emails received for the CDBG programs. Received 10 2020 AAP funding applications.
Social/Digital Media	Non-targeted/broad community	Digital medial including: Facebook, Twitter, NextDoor, Channel 8, and the City's Website/CDBG page.	
Event Booths	Entire City of Commerce City Target Area	Three booth were staffed at: Neighborhood Outreach (60 residents) C3 Fest (100 residents) Adams City Middle School (30 residents)	Disseminated printed information on all CDBG programs and Fair Housing. Explained how the CDBG program operates.

Mode of Outreach	Target of Outreach	Summary of Attendance/Response	Summary of Comments Received and Responses
Community Resource Network Meeting	Higher education and area businesses	26 attendees representing 20 organizations.	Funding opportunity needs and emerging and existing CDBG funding programs. Four 2020 AAP applications received from meeting attendees.

Expected Resources

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

Introduction

Entitlement grant resources for 2020 are estimated at \$419,175. The 2020 grant will principally benefit LMI residents by providing safe, accessible, and energy-efficient housing, assist residents with disabilities, prevent homelessness, reduce crime, provide suitable and affordable living environments, and assist the City's elderly and disabled.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	419,175	0	0	419,175	0	This AAP is the fifth and final year of the 5-year ConPlan

Table 4 - Expected Resources – Priority Table

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

Through the application process, Commerce City encourages City departments and subrecipients to report non-CDBG resources to further the reach of the activities. The City anticipates working with various organizations and City departments to leverage funding into the 2020 CDBG projects.

Specifically, through the 2020 AAP the City will report any leveraged funds from the following partners:

- Audio Information Networks

- Brothers Redevelopment
- Kids in Need of Dentistry
- Senior Hub

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

n/a

Discussion

n/a

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Services	2017	2020	Homeless Non-Homeless Special Needs Non-Housing Community Development	Core City Citywide	Public Services for Low-Income / Special Needs	CDBG: \$185,674	Public service activities other than Low/Moderate Income Housing Benefit: 396 Persons Assisted
2	Minor Home Repair	2017	2020	Affordable Housing	Core City Citywide	Preserve and Expand Affordable Housing	CDBG: \$149,667	Homeowner Housing Rehabilitated: 21 Household Housing Unit
3	Administration and Planning	2016	2020	Non-Housing Community Development	Core City Citywide	Affirmatively Further Fair Housing Choice Program Administration and Planning	CDBG: \$83,834	Other: 1 Other

Table 5 – Goals Summary

Goal Descriptions

1	Goal Name	Public Services
	Goal Description	Audio Information Network: Provide bilingual audio equipment and services for the blind and reading disabled. Domestic Violence Victim Support: Provide Domestic Violence Victims financial support with temporary housing & utility payments. Kids in Need of Dentistry: Provide low-cost tele-dentistry services to children. Senior Hub: During the pandemic, provide three prepared and packaged meals per week per person, at the Mercy Housing Holly Park (MHHP). Senior Hub will also offer Senior Tech classes to assist with social media and online communication to alleviate isolation.
2	Goal Name	Housing
	Goal Description	Paint-a-Thon: Paint the exterior of homes, make accessibility improvements, and perform yard clean-ups for disabled and senior homeowners. Minor Home Repair Program: To help single-family, owner-occupied, LMI homeowners make needed home repairs to meet health, safety, accessibility, and energy efficiency needs.
3	Goal Name	Administration and Planning
	Goal Description	Administration and planning functions associated with the CDBG program. Fair Housing law outreach and training.

Projects

AP-35 Projects – 91.220(d)

Introduction

The 2020 AAP projects are identified below.

Projects

#	Project Name
1	2020 Public Services - Domestic Violence Victims Support
2	2020 Public Services - Audio Information Network
3	2020 Public Services - Kids in Need of Dentistry
4	2020 Public Services - Senior Hub
5	2020 Housing - Paint-a-Thon Program
7	2020 Housing - Minor Home Repair Program
8	2020 Administration & Planning

Table 6 - Project Information

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

All activities listed will help address a priority need in the 2016-2020 Consolidated Plan. The applicants have been or appear to be capable and experienced in executing their projects. The projects fit within an adopted City planning document. Each project will help to prevent, prepare for and/or respond to the COVID-19 pandemic.

AP-38 Project Summary

Project Summary Information

1	Project Name	2020 Public Services - Domestic Violence Victims Support
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public Services for Low-Income / Special Needs
	Funding	CDBG: \$60,139
	Description	Through the Police Department Victim Services Department: Provide for temporary, limited housing support payments to escape abuse and avoid homelessness. Payments are made directly to the billing entity (utilities, landlord or mortgage company, hotel, etc.). Emergency cell phones may also be provided. Financial assistance typically will run for one month. During the first several months of the pandemic, domestic violence crime has doubled.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 30 households/94 residents will benefit.
	Location Description	Police Department, 7887 E. 60 th Avenue, Commerce City, CO 80022
	Planned Activities	Temporary payment of victim's rent, mortgage or hotel rooms; utilities; and other housing, and moving-related expenses.
2	Project Name	2020 Public Services - Audio Information Network
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public Services for Low-Income / Special Needs
	Funding	CDBG: \$25,000

	Description	To provide free equipment, training, audio recordings and low-cost internet services to blind/low vision and print-disabled residents of Commerce City. Free services include equipment, in-home setup and training, in-home and remote troubleshooting, equipment maintenance and studio technology upkeep, and ongoing program preference monitoring. Low-cost internet and if necessary hot spots are provided as necessary. PPE and disinfection supplies will be provided to Clients and staff.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 35 households/112 residents will benefit.
	Location Description	1700 55 th Street, Suite A Boulder, CO 80301
	Planned Activities	Provide bilingual audio services for the blind and reading disabled.
3	Project Name	2020 Public Services - Kids in Need of Dentistry
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Neighborhood Revitalization Public Services for Low-Income / Special Needs
	Funding	CDBG: \$42,535
	Description	KIND will establish tele-dentistry services for low-income residents. KIND serves patients regardless of their ability to pay and no children are turned away due to the inability to pay. KIND also needs additional medical grade PPE and disinfection supplies for the clients and staff entering the clinic.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 250 LMI residents will be assisted.

	Location Description	3280 N. Downing Street, Unit E Denver, CO 80205
	Planned Activities	Provide tele-dentistry staff, equipment, at-home dental kits, and software for low-income resident children.
4	Project Name	2020 Public Services - Senior Hub
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Neighborhood Revitalization Public Services for Low-Income / Special Needs
	Funding	CDBG: \$58,000
	Description	To prevent the spread of COVID 19, the Senior Hub can no longer provide communal meals at the Mercy Housing Holly Park (MHHP). MHHP in a low-income apartment complex. To adapt, Senior Hub will provide three prepared and packaged meals per week to seniors living in MHHP. Local volunteers will deliver them. Approximately 90 meals a week will be served. Fresh fruits, vegetables, and dairy will also be provided. MHHP youth volunteers will assist in delivering the meals and will receive a free meal. Senior Hub is involving partnerships with local farms, restaurants, and supermarkets to support the program and help the local economy stay in business. Additionally, Senior Hub will offer Senior Tech classes to assist with social media and online communication to alleviate isolation during the pandemic. For the local volunteers and staff PPE and disinfection, supplies will be provided.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 50 LMI residents will be assisted.
	Location Description	Mercy Housing Holly Park (MHHP) apartments: 5524 E. 60 th Avenue, Commerce City, CO 80022. Senior Hub: 10190 Bannock Street, Northglenn, CO 80260
	Planned Activities	Provide staff and expenses for the meal preparation and delivery program and Senior tech classes to alleviate isolation during the pandemic.
	Project Name	2020 Housing - Paint-a-Thon Program

5	Target Area	Citywide
	Goals Supported	Minor Home Repair
	Needs Addressed	Housing Preserve and Expand Affordable Housing
	Funding	CDBG: \$35,167
	Description	Exterior home painting, accessibility improvements (ramps, railings and grab bars), one-time yard clean up, light tree trimming and minor landscape modifications for disabled and senior homeowners.
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 11 LMI elderly/disabled households will be assisted
	Location Description	LMI households located Citywide with a focus on the Target Area.
	Planned Activities	Provide paint, painting supplies, and disposable yard clean-up supplies for exterior home painting, accessibility improvements, and yard clean-up for disabled and senior homeowners. Disinfection supplies and PPE will be provided for staff, clients, and volunteers.
6	Project Name	2020 Housing - Minor Home Repair Program
	Target Area	Citywide
	Goals Supported	Minor Home Repair
	Needs Addressed	Preserve and Expand Affordable Housing
	Funding	CDBG: \$114,500
	Description	The Minor Home Repair Program (MHRP) will provide grants up to \$10,000 (plus \$1,450 in city taxes, permits, PPE, & activity delivery) to rehabilitate LMI single-family, owner-occupied homes. This program will repair and improve homes to increase the safety, health, accessibility, and energy efficiency of residents' homes. Disinfection supplies and PPE for the staff and clients will be provided.
	Target Date	9/30/2021

	Estimate the number and type of families that will benefit from the proposed activities	Rehab of 10 LMI single-family, owner-occupied homes
	Location Description	LMI households located Citywide with a focus on the Target Area.
	Planned Activities	Planned activities will include plumbing, electrical, roof, furnace, hot water heater, and foundation repairs/replacements. Insulation, ramps, walk-in showers, railings and stair-lifts are also included.
7	Project Name	2020 Administration & Planning
	Target Area	Citywide
	Goals Supported	Administration and Planning
	Needs Addressed	Program Administration and Planning
	Funding	CDBG: \$83,834
	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	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable
	Location Description	7887 E. 60th Avenue, Commerce City, CO 80022
	Planned Activities	CDBG administration, regulation compliance, outreach, community education, document preparation, and CDBG office management.

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 land area is approximately 41 square miles.

Commerce City's 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, isolated pocket neighborhoods. The City established the Target Area around these older pocket neighborhoods, which average 73% LMI per the 2017 Census.

Commerce City, Colorado – General Maps

The following 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 projects working in the Target Area are prioritized for the allocation of CDBG resources. However, individual LMI and several special population residents residing throughout the City may be eligible for CDBG funds.

See maps in the Grantee Unique Appendices.

Geographic Distribution

Target Area	Percentage of Funds
Core City	80
Citywide	20

Table 7 - 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 the highest percentage of LMI individuals, minorities, and older homes in need of rehabilitation. The Target Area contains Census Tracts of 87.05, 87.06, 87.09, 88.01, 99.02, and 89.01. Additional names for the Target Area include the Core City and the Historic City.

Based on the income of the residents and the age of the homes most housing rehabilitation work will take place in the Target Area. The Public Services being funded will be dispersed as needed throughout the City to benefit LMI and special population residents.

Discussion

n/a

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 the 2020 AAP's development processes. The City's Affordable Housing Study and the 2018/2019 Affordable Housing Implementation Plan highlighted the extreme need for affordable housing. The high HRP demand and the recent housing studies are a compelling reason to provide decent, safe, and affordable housing is phenomenal demand for the HRPs directed the 2020 AAPs housing priorities.

To meet these needs for our residents, the 2020 AAP will continue to fund the HRPs to assist another 21 households with rehab activities. The CDBG will continue to manage the MHRP and coordinate with the Paint-a-Thon program.

Through the Police Department Victim Services Department: Provide for temporary, limited housing support payments to escape abuse and avoid homelessness. Payments are made directly to the billing entity (utilities, landlord or mortgage company, hotel, etc.). An estimated 30 households will benefit.

The goals for the number of households supported in the 2019 program year are provided below.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless (DVV and MHRP)	40
Special-Needs (PAT)	11
Total	51

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	30
The Production of New Units	0
Rehab of Existing Units	21
Acquisition of Existing Units	0
Total	51

Table 9 - One-Year Goals for Affordable Housing by Support Type

Discussion

Three of the six 2020 AAP projects involve affordable housing. The DVV program provides temporary emergency housing assistance to allow the victim and their dependents the opportunity to find other

housing and not become homelessness.

To combat the loss of available affordable housing and increasing homelessness, the City seeks to assist LMI homeowners to remain in their homes. LMI homeowners at risk of losing or leaving their homes because of financial pressures, accessibility issues, and/or unsafe living conditions. As these rehabilitated homes are sold, a supply of improved, decent, safe, and relatively affordable housing will enter the market. Both of the HRP (MHRP and Paint-a-Thon) will improve the:

1. health of the home's occupants,
2. safety of the home,
3. accessibility of the home,
4. value and economic security of the home,
5. ability of seniors to age in place, and/or
6. energy efficiency of the property, thereby reducing utility costs.

The MHRP will grant up to \$10,000 in rehabilitation costs plus up to \$1,450 in work, permits, fees, PPE, and project delivery costs to rehabilitate approximately 10 LMI single-family, owner-occupied homes. The City will engage the services of a home repair contractor to continue to assist in the operations of the fifth year of the MHRP. This program will prioritize the repair work based on improving the safety, health, energy efficiency, and accessibility of the residents in their homes. Service referrals may also be offered for homeowners to provide useful tools for the long-term maintenance and repairs of their homes.

The Brothers Redevelopment, Inc., Paint-a-Thon Program (PAT) will paint the exterior of 11 homes, improve accessibility, and provide yard clean-up for the disabled and/or seniors homeowners. This subrecipient will advertise, promote, qualify, equip, and organize the volunteers for each home activity. The CDBG funds will be used to purchase the paint, supplies and PPE supplies to perform the above activities.

To further meet the housing needs of City residents, the CDBG Office is collaborating with the Commerce City Housing Authority (CCHA). The CDBG Office and CCHA will work together to coordinate each other's grant and loan programs for LMI homeowners. As needed, the HRP applicants are directed to the CCHA. The CCHA has a large housing rehabilitation loan program with an estimated limit of approximately \$20,000. The CCHA will perform its independent loan application evaluation to either accept or deny the applicants.

AP-60 Public Housing – 91.220(h)

Introduction

Commerce City residents are served by both the Maiker Housing Partners (formerly Adams County Housing Authority) and the Commerce City Housing Authority (CCHA). Maiker Housing Partners 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 does **not** own any Public Housing as defined by the federal government. The CCHA does have 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:

- Seeking new affordable housing opportunities like the 216-unit, affordable (60% AMI) North Range Apartment complex completed in 2019.
- Evaluating CCHA's properties to ensure efficient and effective use.
- Utilizing and implementing the *2018 Housing Needs Assessment* and *2018/2019 Affordable Housing Implementation Plan*
- Continuing to examine possibilities to expand the voucher program to help address current unmet housing needs in Commerce City.
- Supporting efforts by the City's Neighborhood Services Division to strengthen enforcement of code violations thereby improving the health, safety, and livability of homes and area neighborhoods.

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

Although the City does not have public housing stock, the CCHA plans to take the following actions toward increasing the self-sufficiency and involvement of its residents by:

- Continue to collaborate with development organizations such as Connect for Colorado, Habitat for Humanity, and the Urban Land Conservancy to develop senior and affordable housing.
- Collaborate with partners to educate residents about homeownership, home maintenance, and mortgage programs and practices.
- Examine opportunities for CCHA to support existing residents to develop important

homeownership skills and refer to other resources.

- Meet with, and reach out to, residents and resident leaders to better understand and respond to needs and goals.
- Support programs encouraging residents to become active and involved within their community, including awareness and involvement in their neighborhoods, 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 Unison Housing Partners (formerly Adams County Housing Authority) is designated a “Small PHA” and is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled.

Discussion

n/a

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

Introduction

This section identifies actions Commerce City will take over the next year through the 2020 AAP to address homelessness and other special needs. The 2016-2020 Consolidated Plan, considers homelessness and other special population needs as high priority for the City's CDBG program.

The City will:

1. Provide \$60,139 in funding to the Commerce City's Domestic Violence Victim Program (DVV). At least 254 (35%) of the City's 726 domestic violence victims assisted in 2019, needed financial assistance to avoid homelessness. The DVV provides victims and their dependents with emergency assistance to escape their abuser and keep a roof over their heads. This temporary, emergent, financial support program pays for housing, moving, and utility costs. The CDBG funding will assist approximately 30 households (94 residents) who are victims of domestic violence. A dramatic increase in domestic violence, due to the Stay-at-Home and Safer-at-Home orders given by the Governor and Tri-County Health Department, has been observed by the City's Police Department (PD) DVV program. The DVV has requested additional funding to help adjust to the increases.
2. Provide \$114,500 to the Minor Home Repair Program to help 10 LMI families rehabilitate their homes. This will extend the affordability and livability of these homes. The MHRP may also include homeowner education and resources to help owners maintain and afford their homes, thereby avoiding homelessness. The increased equity in their home improves their economic standing and financial security, thereby avoiding homelessness. The MHRP also provides accessibility improvements to increase the time elderly and disabled residents can safely and affordably stay in their homes. This avoids homelessness and decreases the pressure on the area's supply of affordable housing for seniors and the disabled.
3. Provide \$35,167 to the Paint-a-Thon program to help approximately 11 elderly and/or disabled owners maintain their homes. The resulting neighborhood revitalization will increase area home values. The increased equity in their home increases their economic standing and financial security, thereby avoiding homelessness. To cope with the increased COVID-19 prevention costs and the new Lead-based Paint (LBP) regulations, Brother's Redevelopment has requested additional funds. They will need an additional \$800 per household on average to pay for on-site PPE supplies, port-a-potties, and 3rd party LBP abatement services.
4. Fair Housing Activities will educate area housing professionals and residents on the laws, regulations, and rights of the individual. This will help prevent future housing discrimination and promote discrimination reporting and resolution. Helping to prevent discrimination will allow better access to housing and increased retention of housing, thereby avoiding homelessness.
5. The City's CDBG office will continue distributing resource information materials to residents, area service organizations, and at the Civic Center and both Recreation Centers. This will assist

LMI residents to reduce their housing costs and access area resources making remaining in their homes more affordable.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City will continue to support and promote efforts by local nonprofit organizations serving the homeless. It will also support Adams County in providing outreach and case management services by assessing individual needs and linking them with appropriate county services. The City has committed \$220,000 in CDBG-CV funds and \$500,000 in other CARES Act funds for rent and mortgage assistance to help resident avoid homelessness during the pandemic.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City has allocated DVV program funding in all past four years of AAPs. This funding provides temporary, emergency housing and utility support for victims of domestic violence.

The City CDBG Office and the CCHA will continue to provide referrals to homeless persons and residents at-risk of being homeless. The CDBG Office's partnership with the Community Resource Network organization improves the delivery of services and resources to the homeless and residents at risk of becoming homeless. The City will continue to seek out new partnerships with, nonprofits, faith-based organizations, the school districts, and other such community programs.

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

Continued efforts will be made to further network with and partner with Adams County Homeless Services, Almost Home, CASA of Adams & Broomfield Counties, Catholic Charities, Community Services of the Archdiocese of Denver Inc., Star Girlz, 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.

The CDBG Office and the CCHA will continue to work directly with residents and with local partners to: develop additional affordable housing units, reduce living expenses, providing emergency services to domestic violence victims, disabled, and senior resources. This includes LMI individual families recently discharged from a facility.

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

Discussion

n/a

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

Introduction:

The rapid rise in housing costs, overall housing shortage, high housing development costs, a rapid increase in population, diverse housing shortages, and the deterioration of existing affordable housing all contribute the City's current barriers to affordable housing.

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

Rehabilitate the Aging Affordable Housing Stock

The CDBG Office will continue rehabilitating LMI single-family homes over the next year. All owner-occupied manufactured homes are also part of the Home Repair Programs. This AAP will assist the City to rehabilitate 21 homes in PY2020. The preservation of the City's affordable housing stock through rehabilitation helps prevent loss due to deterioration. Homes will remain available to LMI households over generations.

Encourage Housing Stock Diversification for Lower Income Households

“Commerce City will expand the variety of housing types throughout quality neighborhoods for life-long living. Housing should accommodate students, families, singles, aging seniors, and people with disabilities, all at multiple-income levels.”

Increased development of diverse and affordable housing includes multi-family dwellings, senior housing, “Middle Housing”, retirement communities, and alternative housing. Possible alternative housing includes transit-oriented housing, accessory dwelling units, co-housing, and small home communities. The City will be seeking partners in transit-oriented housing near the new N Line train station depot on the west side of the City. Based on the recently adopted housing studies, the City will investigate changing their land use, building codes, and zoning codes to permit increased housing diversity for accessible homes, accessory dwelling units, and small home communities.

Discussion:

n/a

AP-85 Other Actions – 91.220(k)

Introduction:

n/a

Actions planned to address obstacles to meeting underserved needs

To help remove obstacles to meeting underserved needs and improve service delivery, Commerce City will:

1. Facilitate social service collaborations to help coordinate services within the City;
2. Disseminate news and information to area organizations and City residents;
3. Spearhead community-wide solutions to local needs;
4. Spearhead coordinated solutions to local needs; and
5. Reduce service redundancy within City departments and area social service organizations.

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. Seek out non-profit organizations and other government programs for funding, consultation, and cooperation to increase and improve LMI housing units within the City;
2. Seek out non-profit organizations, area businesses, and other government programs for funding, consultation, and cooperation to improve neighborhoods and foster workforce training and economic opportunities for City's residents;
3. Gather and disseminate information on area resources to help residents meet their financial needs and unanticipated costs.

Actions planned to reduce lead-based paint hazards

As part of the City's MHRP, 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.

The City will contract with subrecipients and contractors who are certified and dedicated in the evaluation and abatement of lead-based paint in housing constructed before 1978. Additionally, the City and these entities will provide property owners with educational information regarding the hazards of lead.

The City's CDBG Office will review the actions taken by the hired agencies for 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 Tri-County Health and the state health

department for lead screenings.

The new LBP regulations requiring third-party verification and additional remediation will be followed and additional funds will be provided to the PAT programs to offset the related cost increases and increase the number of homes assisted.

Actions planned to reduce the number of poverty-level families

Commerce City has by far the highest job ratio in the surrounding area, nearly twice that of most other communities. The City of Commerce City's jobs-to-household ratio of 2.04, meaning there are two jobs per household.

Before COVID-19, unemployment was at its lowest levels in decades – at 3% in 2019. During the peak months of the pandemic the unemployment rate rose to 12.3% at its highest in April of 2020, however it has since steadily improved to 8.2% in July, 2020.

Program referrals to families can temporarily reduce the cost of living. Such referrals include the Home Improvement Programs, food banks, job training, scholarship programs, medical, youth, small business assistance, and senior programs. Strengthening families economically, supporting single-parent families, female heads of households, and lowering the cost of living will reduce household poverty in the City.

Even with referrals and a local economy that is trending towards a recovery, low wages are a concern. ACS estimates the City's 2018 poverty level is 12.6%. Lower education levels, race, sex, and the number of female heads of households help contribute to the number of poverty-level families.

In 2018, men made approximately 1.25 times more than female employees did. In Colorado, median earnings for males 25 years and over was \$44,268 while the average median earnings for females was \$35,536 (2014-2018 ACS). The Adams County Housing Needs Assessment states: "Single female head of households with no husband present are more likely to be in poverty than married-couple families. The poverty rate was 10.3 percent for all families in the County, but female-headed households with no husband present had a 25.4 percent poverty rate. Families were also more likely to be in poverty with related children under 18 years living in the home."

In Commerce City, according to the 2014-2018 ACS, Median Earnings by Education Attainment demonstrated residents with less than a high school diploma made \$30,342. A resident with some college made 39% more, and a resident with a bachelor's degree made 77% more than a resident with less than a high school diploma.

Commerce City has an overall 19% percent dropout rate and is the third-highest of most other places in the area. The area within the City with the highest rate is Derby Neighborhood (within the Target Area) with a 39% percent dropout rate. Fewer than six percent of those in the city's Target Area have a bachelor's degree or higher, while more than 32 percent of those in the northern range of Commerce

City have a bachelor's degree.

Reducing households in poverty can occur by improving education, job training, and job opportunities for residents, especially females and minorities. The City's SBRC (supported with 2018 CDBG funding) promotes job training, employment services, small business start-ups, small business loans and technical assistance. The SBRC partners with local colleges, non-profit organizations, financial institutions, local trade schools, chamber of commerce, faith-based organizations, incubators, and business development centers to provide City residents the services listed above.

Actions planned to develop institutional structure

The restoration of the CRN provides institutional knowledge and networking, overcomes gaps in services, and reduce unnecessary service duplications. The City will continue to co-facilitate this organization throughout the 2020 AAP timeline.

In 2016, the City formed the CDBG Team. The CDBG Team is comprised of numerous divisions and departments including: Planning, Building, Neighborhood Services, Economic Development, Public Works, Parks, Recreation & Golf, Housing Authority, Communications, Legal, City Manager's Office, and Finance. This team guides the AAP process providing expertise, insight, and experience within the community. Each year the CDBG Team works to meet the needs of City residents, fill any institutional gaps, and provide citywide interdepartmental cooperation and guidance in recruiting service providers and selecting CDBG projects.

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

The City will encourage and seek-out community-based solutions and regional partnerships. CDBG Office contact and coordination with area governments, the CRN, other area service organizations, public and private housing facilities, and social service agencies to enhance coordination in the implementation of the Consolidated Plan. Actions include:

1. Continue offering technical assistance to agencies on available funding sources, associated timelines, applicable requirements, and the most impactful uses of funds.
2. Continue participating in regional efforts and meetings with public and private housing, educational entities, economic development organizations, social service agencies, and other governments.
3. Continue providing pre-application and referral information for property owners considering the MHRP, PAT, and AC WX programs as described under the Project Section.
4. Continue to attend training opportunities provided by HUD, NCDA and the City.
5. Continue membership and participation in the statewide CDBG User Group.
6. Continue membership in the NCDA.

7. Further develop the COVID-19 rent and mortgage assistance program will coordinate with the Maiker Housing Partners and non-profit organizations that assist with urgent short-term housing needs. The CDBG-CV funds will be used to directly pay private landlords and mortgage companies on behalf of City residents. The City will provide outreach for the new COVID-19 assistance program through stakeholders, non-profits, governmental agencies, and numerous print and social media outlets.

Discussion:

n/a

Program Specific Requirements

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

Introduction:

The estimated percentage of CDBG funds used for activities benefiting persons of low- and moderate-income over the one-year period covered by this 2020 Annual Action Plan is 70% and above.

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 that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
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.	90.00%

Since the City became an Entitlement Community, no program income was produced. Additionally, there are no 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. However, CDBG-CV funds are dedicated in the amended 2019 AAP to make rent or mortgage payments to LMI households during the pandemic.

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

For a copy of all related attachments, please contact the City's CDBG Office at: csteinberg@c3gov.com.