



Commerce
CITY

City of Commerce City,
Colorado

Community Development Block Grant

2019 Annual Action Plan CARES Act Substantial Amendment *Draft*

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

Originally Adopted
Adopted July 1, 2019

Proposed Amendment for June 15, 2020

City of Commerce City, Colorado
CDBG
2019 Annual Action Plan (AAP)
CARES Act Substantial Amendment
Draft

AP-05 Executive Summary - 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 fourth Annual Action Plan as part of the adopted 2016-2020 Consolidated Plan.

This Substantially Amended 2019 Annual Action Plan (2019 AAP) is in accordance with HUD guidelines 24 Code of Federal Regulations (CFR) Part 91.220. This year's CDBG funded activities and the subsequent amendments are outlined in the AAP. They adhere to at least one of 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.

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 2019 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 \$428,484 in CDBG funds to utilize during its fourth program year, which runs from October 1, 2019, through September 30,

2020. This represents a 7.3 percent decrease from the 2018 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.

A substantial amendment is needed to respond to the 2019 coronavirus pandemic and reallocate previous years' funding. On March 13, 2020, President Trump declared a national emergency under both the Stafford Act and the National Emergencies Act. On March 27, 2020, President Trump signed the Coronavirus Aid, Relief, and Economic Security (CARES) Act was signed into law to assist the nation to prevent, prepare for and respond to the coronavirus pandemic (COVID-19). The CARES Act made available to the City an additional \$246,587 in funding through the CDBG Coronavirus (CDBG-CV) funds and relaxed regulations to expedite the use and administration of the 2019 and 2020 Annual Action Plans. Specific details are explained in HUD's Availability of Waivers memorandum issued on April 1, 2020.

Additionally, HUD temporarily suspended the 15% public service spending cap on the 2019 AAP if the public service activity will help prevent, prepare for or respond to the COVID-19 pandemic. Therefore, this amendment also reallocates unspent funds from the 2016 and 2017 sidewalk installation and curb cut projects (\$16,982 and \$11,169 respectively) and the unspent funds from the 2017 PRG Scholarship Program (approximately \$2,500) to:

1. Expand the 2019 Domestic Violence Victims Support Program (DVV)
2. Make whole and provide personal protection equipment for the 2019 Paint-a-Thon Program

It is also the intent of this Substantial Amendment to authorize the reallocation of:

1. Up to 100% of the Arapahoe County Weatherization Program's 2019 AAP funding
2. up to 50% of the Minor Home Repair Program's 2019 AAP funding

on an as needed basis to help prevent, prepare for or respond to the COVID-19 pandemic. The City Manager's Office will determine if, when, and how much of the above-listed funding will be diverted. Should the City determine the funds are not needed, they will remain in the originally allocated programs.

This Substantial Amendment will also allow existing 2019 AAP and CDBG-CV funding recipients to purchase, within their existing allocation budget, need personal protection equipment for their employees, volunteers, and residential clients.

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, 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 the three HRPs and each individual applicant is managed through the CDBG Office.

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). The CDBG Office currently implements the eleven active projects from 2016, 2017, and 2018's AAPs.

In 2019, the City will further address the home rehabilitation needs outlined in the ConPlan by continuing the three HRPs. Two new non-profit subrecipients will help address the needs of thirty of the City's disabled and younger 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 projects meet the identified needs of LMI residents:

Home Repair Programs (MHRP, AC WX, and PAT)

Minor Home Repair Program (MHRP) – A continuation and increase of the 2017 and 2018 MHRPs to address the health, safety, accessibility, and energy efficiency of LMI owner-occupied, single-family homes through rehabilitation work.

Arapahoe County Weatherization Program (AC WX) - AC WX provides weatherization services to LMI households. Services begin with an energy audit to determine needed energy conservation measures for the home. As indicated, they replace combustion appliances, thermostats, and insulate the home.

New this year is the addition of rooftop solar panels. Up to five homes will receive installed solar panel systems through an AC WX partnership with GRID Alternatives, a local non-profit organization providing area youth job training in solar installation.

Brothers Redevelopment, Inc., Paint-a-Thon Program (PAT) - 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.

All of the HRP's listed above will help improve the:

- a. health of the home's occupants,
- b. safety of the home,
- c. value and economic security of the home,
- d. ability of seniors to age in place,
- e. accessibility to the disabled, and/or
- f. energy efficiency of the property

Public Services Supporting Special Needs Populations and Youth Focused Activities

Audio Information Network of Colorado (AIN) - Provide bi-lingual audio services for residents who cannot see 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.

Groundworks Denver (GWD) - hire a youth team from Commerce City, to provide on the job training, leadership, and skill development for the LMI youth. The Team then performs environmentally based projects in the Core Area of the City.

Public Services Supporting Homelessness and Crime Prevention

Support for Domestic Violence Victims (DVV) - This is a continuation 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.

COVID-19 Rent and Mortgage Assistance - The CARES Act grant funds will be utilized to financially assist residents impacted by COVID-19.

3. Evaluation of past performance

Accomplishments (June 1, 2018 – May 31, 2019)

General CDBG Administration

The CDBG Office established the annual work cycle necessary to meet all required HUD deadlines. Previous administrative tasks included.

- a. Passing the 2018 spending *Timeliness Test* performed by HUD.
- b. Performing an on-site monitoring visit for all Subrecipients and providing written formal reports.
- c. Preparing financial quarterly reports and submitted them to HUD.
- d. Submitting financial reports and drawdowns through IDIS.

AAP Project Implementation

Over the first three years, the City's CDBG program funded 16 projects to assist the LMI residents in the community. The projects range from housing to public facilities to economic development. For each project, a program agreement and related environmental reviews must be in place prior to launching the program. Eleven of the 16 projects are active. The CDBG Office performed the following:

- e. Worked with the PW Department to brief new staff and consultants to execute the Sidewalk Projects including design and engineering, right-of-way and easement purchases, drafting the new consultant RFP and contract for hire.
- f. Drafted and executed three Interdepartmental Understandings for 2017, 2018, and 2018 amendment for the Police Department's Domestic Violence Victims (DVV) Program, Small Business Resource Center (SBRC) Staffing Project, and SBRC Facility Project.
- g. Drafted and executed two *Subrecipient Agreements* between the City and Arapahoe County, CO Weatherization Division, and Brothers Redevelopment, Inc.'s Paint-a-Thon Program.
- h. Hosted a tour of the SBRC for HUD.
- i. Drafted the appropriate beneficiary and tracking forms for the DVV, PRG, and SBRC Staffing programs.
- j. Provided technical assistance for the IT Department with their RFP and contract formation for contractor hiring on the SBRC Facility Renovations.

- k. Drafted and executed the Programmatic Agreement between the City and the Colorado State Historic Preservation Office.
- l. Prepared 13 Environmental Reviews – all properly noticed and entered into HEROS.
- m. Developed the required Tier 2–Site Specific Environmental Checklists for all three Home Repair Programs and all seven possible Sidewalk Projects.
- n. Prepared and released the City's first RFP and contract for the MHRP administration.
- o. Interviewed respondents to the MHRP RFP and hired Brothers Redevelopment, Inc. (BRI) to help administer the MHRP.
- p. Held a MHRP internal training for City staff including CD Administration, Neighborhood Services, Police Department, and Active Adult Center.
- q. Prepared the City's MHRP Guide and supporting materials for insertion into the HRP Application Packets. Assembled 160 Application Packets – 40 of them in Spanish.
- r. Working closely with the Communications Department, launched the three HRPs on January 25, 2019. HRPs promotions utilizing the CDBG Webpage, the *Connected*, Facebook, Twitter, Channel 8, flyers and posters, NextDoor, the *Commerce City Sentinel*, *La Prensa*, *Telemundo*, and *The Denver Post*.
- s. Fielded over 300 phone call, letters, and emails from residents about the Home Repair Programs. Provided over half of these with additional referrals to other area services.
- t. Sent 95 application packets directly to City residents. An additional 50 packets were distributed in person at the Information and Neighborhood Services counters.
- u. Provided in-person, one-on-one assistance for approximately 20 residents with HRP application questions.
- v. Received and processed 68 applications for the HRPs.
- w. Prepared eight Tier 2-Site Specific environmental reviews.
- x. Issued six individual MHRP project *Notices to Proceed* to the Contractor.

CDBG Outreach

- y. Established additional connections with other departments, divisions, public agencies, area governments, and service providers.
- z. Continued to serve as co-facilitator of the Community Resource Network - Connecting for a Better Community (CRN) allowing area service providers to hold meetings, network, and learn about other area service

providers. The group meets six times a year, providing two speakers at each meeting. Presented the CDBG programs at the December 2018 meeting.

- aa. CDBG Office joined and attended meetings of the City's Emergency Services Task Force.
- bb. Met with seven City departments and divisions to educate them on CDBG funding opportunities and the application process.
- cc. Following the CDBG Citizen Participation Plan:
 - i. Held three Public Input Meetings.
 - ii. Contacted, interviewed, and/or met with 71 public service organizations and City Departments about applying for funding.
 - iii. Received five Project Idea Forms directly from residents of the City.

2017 CAPER and the 2018 Annual Action Plan

- a. Drafted and submitted to the public and City Council the 2017 CAPER (Consolidated Annual Performance Evaluation Report)
- b. Submitted the 2017 CAPER to HUD in IDIS (HUD's software program)
- c. Drafted and submitted to the public and City Council the 2018 Annual Action Plan.
- d. Prepared the *Interdepartmental and Non-profit Funding Applications* for the 2019 CDBG Program.
- e. Advertised the applications' availability and submission process via direct email, CDBG webpage, CRN, *CDBG Updates*, and meetings.
- f. Provided technical assistance to 21 potential applicants, nine of whom applied for 2019 funding.
- g. Evaluated the nine project proposals for eligibility, viability, and risk assessments.
- h. Held two meetings with the CDBG Team to review the nine applications for funding. Final review and ranking took place on May 10, 2019.
- i. Maintained the CDBG records in the Econ Planning Suite in IDIS (HUD's software program).

Training for CDBG Office

- a. Joined the National Community Development Association (NCDA) and participated in their informational forum every week.
- b. Attended NCDA's 3-day CDBG Basics Training In September.
- c. Attended the NCDA's 3-day training on Subrecipients in October.

- d. Attended numerous online HUD Exchange Trainings.
- e. Attended the City's on-site beginning, intermediate and advanced training for Microsoft Word, Excel, OneDrive, SharePoint, and Skype for Business; plus Employment Law.

Obstacles and Delays

Previous AAPs funded a wide variety of programs to meet the City's ConPlan needs and goals. Eleven of the sixteen previous programs received *Notices to Proceed*, are moving forward and doing well.

The time expended to establishing new programs, organizational staffing shortages, and federal reporting requirements hindered five subrecipients. These five projects total \$115,840 in grant funding. To meet the HUD *Timeliness Test* the unspent funding should be reallocated into existing projects.

To reduce the previously mentioned obstacles and delays, the CDBG Team funded four returning CDBG projects and reduced the total number of 2019 AAP projects to six.

4. Summary of Citizen Participation Process and consultation process

The CDBG spent several months speaking with area programs, non-profit organizations, commissions, faith-based organizations, educational services, medial programs, housing services, area developers, neighboring governments, HUD staff, and key City departments and divisions. The consultations' goals included identifying needs within the City, available resources, and promoting the CDBG program. If the CDBG Program could assist the identified needs, the organization was encouraged to submit a funding application for 2019.

The CDBG Office also worked to obtain resident input for project ideas and their views on potential and existing projects. Various mediums received input from residents of all demographics. The types of outreach used included:

Project Input Meetings

Two Public Input Meetings (PIM) obtained feedback from residents regarding the City's CDBG Program, including active and future AAP projects. All the meetings were handicapped accessible. Fair housing laws and concerns were discussed at each meeting.

In 2019, the first PIM was at the Eagle Pointe Recreation Center, on Wednesday, January 23, 2019. The second was at the SBRC in the Derby Neighborhood on

March 26, 2019. Both meetings were within the CDBG Target Area. The presentation and handouts were in both English and Spanish. A Spanish interpreter was advertised and present at both meetings. These meetings were noticed in the *Commerce City Sentinel*, the *Connected* and *La Prensa de Colorado*, and advertised on Facebook, Twitter, Channel 8, and NextDoor.

Group Presentations

The CDBG Office presented at nine group meetings on active and future Annual Action Plans. Fair Housing laws and concerns were also discussed.

The CDBG Office co-hosted two short presentations of the arrival, timing, and potential uses for the CDBG-CV funds at the bi-monthly Community Resource Network (CRN) organization on April 29, 2020. This meeting was moved to a virtual setting with 60 attendees from dozens of non-profit organizations, school districts, and local governments.

City Newsletter

The PIM meetings were published in the City's monthly newsletter – *Commerce City Connected*. This English and Spanish newsletter is delivered to every household in the City. Plus, regular announcements of the City's launch of the new HRP's were printed from January - May of 2019.

Public Notifications

For the PIMs, a 15-day notice was published for each meeting in the *Sentinel* and *La Prensa* newspapers. A legal notice was posted in the local paper 31-days prior to the public hearing date with the City Council. The notice informed residents of the proposed 2019 AAP 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.

For the COVID-19 Substantial Amendment, a legal notice was posted in the local paper 6-days prior to the City Council meeting to amend the 2019 AAP. A waiver request was submitted to HUD, and by response omission, was granted, for the shortened notice and comment periods. 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 proposed 2019 AAP Substantial Amendment. Social media was also utilized include Facebook and Twitter.

At the July 1, 2019, regular City Council meeting the public will be invited to comment on the proposed 2019 AAP. The City Council will then considered 2019 AAP for approval and its subsequent submittal to HUD.

A public hearing was held after the substantial amendment for the 2019 AAP presentation at the virtual City Council on June 15, 2020. [REDACTED] comments were received. [Details...](#)

City Website – CDBG Webpages

Since 2017, the City's CDBG webpage encouraged public input a web template called the Project Input Form. This public input process allows 24/7 year-round public input in all 105 Google Translate languages.

Over the past year, the CDBG Office and the Communications Division continually updated the CDBG webpage, adding new information subpages. It currently offers informational videos, the *Public Input Form*, the Home Repair Program Application Packet in both English and Spanish, and for 3-months out of the year a non-profit funding information subpage with the application.

The public hearing for the June 15, 2020, City Council meeting was posted on the website from June 10, 2020, through June 15, 2020.

CDBG Updates

New this year, the CDBG Office sent two *CDBG Updates* by email to over 70 interested parties in the CDBG program. This includes area services organizations and residents seeking to participate in the Home Repair Programs. The contact emails were obtained through information sign-up sheets at meetings and special events.

Neighborhood Outreach Barbeques

On June 14th and August 9th of 2019, the CDBG Office manned a booth at these well attended, fun events. These events provided free food, entertainment, and information booths about the City and area services/businesses. The CDBG Office provided information on the CDBG program and the existing and upcoming CDBG projects. Fair Housing materials were also distributed.

Police Department Events

At the August 2018, National Night Out the Police Department distributed CDBG project and Fair Housing information around area neighborhoods. On February

2, 2019, the CDBG Office presented the CDBG programs and solicited input at the Community Meeting at Eagle Pointe Recreation Center.

COVID-19 Pandemic Virtual Public Input Meeting

On April 15, 2020, the City's first interactive public input webinar was held to discuss the community needs stemming from the coronavirus pandemic. The webinar was originally scheduled as the 2020 AAP's second physical public input meeting. But due to the governor's "Stay at Home" orders and the City's compliance and public building and meeting policies, the CDBG Office re-noticed the meeting as a public input webinar regarding the effects and resulting needs from the coronavirus pandemic. A record turnout was welcomed – 16 residents and interested organizations logged into the Zoom Webinar. A Spanish interpreter was present and heavily utilized to assist several LEP attendees.

5. Summary of public comments

During the 31-day review period of the 2019 Draft AAP no written public comments were received. Please see attached public meeting minutes.

During the 6-day public comment period for the CARES Act Substantial Amendment [REDACTED] written comments were received.

During the June 15, 2020, virtual City Council meeting, [REDACTED] public comments were received.

Additional documentation of the April 15, 2020, public input webinar and the April 29, 2020 CRN webinar is attached.

All comments were considered by city staff and incorporated into the amendment process where possible. For example, the concern for financial assistance for undocumented residents will be considered when selecting a rent and mortgage assistance administrative partner.

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

All comments and views received in the 2019 AAP cycle were processed and considered. The decisions not to incorporate a comment was typically based on the lack of a qualified funding applicant, the timing of the project, the administrative abilities of the CDBG Office, or because it was outside of the 2016-2020 Consolidated Plan Goals.

7. Summary

As the City enters into its fourth 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
Neighborhood Revitalization (Core City) <ul style="list-style-type: none"> ➤ Street, Road or Sidewalk/ADA Improvements ➤ Neighborhood Clean-ups ➤ Demolition & Clearance of Blighted Property ➤ Drainage Improvements 	X	X		X	
Housing Needs <ul style="list-style-type: none"> ➤ Elderly Housing ➤ Homeowner Rehabilitation/Repair ➤ Energy Efficiency Improvements 		X	X X	X X	
Economic Development <ul style="list-style-type: none"> ➤ Employment Training ➤ Financial Assistance for Entrepreneurs & Small Businesses ➤ Business Incubator 			X X	X	
Public Services <ul style="list-style-type: none"> ➤ Youth/Senior Activities/Community ➤ Crime Prevention/Drug Abuse Education ➤ Homelessness Prevention ➤ Coordination of Organizations & Resources 		X X X	X X X	X X X	
Fair Housing Activities	X	X	X	X	

AP-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

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(l))

Over the past year the CDBG Office conducted:

Organizational Consultations	Number of Organizations	Approximate Attendance
Formal Presentations	9	207
Meetings and Telephone Interviews	52	85
City Department Presentations	10	37
Citizen Contacts		425
Totals	71	754

These consultations reached approximately 700 people and 71 organizations. Specifics about these contacts are located in the 2019 AAP attachments.

The City's CDBG Coordinator serves as the co-facilitator to the CRN. This volunteer organization provides education and networking opportunities to **all** the service providers in the Adams County area. The CRN utilizes bi-monthly meetings, an online contact database, a website, and a Facebook site to enhance the coordination between housing, health, and all other service agencies.

CARES Act Substantial Amendment

Organizational Consultations	Number of Organizations	Approximate Attendance
Virtual Webinars/Presentations	2	76
Meetings and Telephone Interviews	16	23
City Department Presentations	1	3
Citizen Contacts		0
Totals	19	102

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.

Regular consultations and applications from Access Housing, Almost Home, and Star Girlz – the only local homeless service and housing providers – provided accurate and current information regarding the needs of and resources for homeless persons and persons at risk of homelessness in Commerce City. The DVV program works directly with the CDBG program 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. Describe Agencies, groups, organizations, and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies, and other entities

1. Access Housing
2. Adams County 14 School District
3. Adams County 27J School District
4. Adams County Aging Network
5. Adams County Community Development
6. Almost Home
7. Anythink Library – Commerce City
8. Arapahoe County Weatherization
9. ARC of Adams County
10. Audio Information Network of Colorado
11. Aurora Community Connection
12. Aurora Network
13. Brother's Redevelopment
14. Center for People with Disabilities
15. City of Aurora Community Development
16. City of Thornton – Community Connections
17. City of Westminster
18. Colorado Access
19. Colorado Cross-Disability Coalition
20. Colorado Housing Connects
21. Colorado Inspires
22. Commerce City CDBG Team

23. Commerce City, City Council
24. Commerce City Communications
25. Commerce City Economic Development Department
26. Commerce City Housing Authority
27. Commerce City Historical Society
28. Commerce City Neighborhood Services
29. Commerce City Parks, Recreation & Golf
30. Commerce City Planning Department
31. Commerce City Police Department – YHOP and DVV
32. Commerce City Public Works Department
33. Commerce City Senior Center
34. Commerce City Senior Commission
35. Commerce City Senior Luncheon
36. Commerce City Seniors
37. Commerce City Youth Commission
38. Community Advocate Council
39. Community Choice Credit Union
40. Community First
41. Community Reach Center
42. Community Resource Gathering – Thornton
43. Community Resource Network – Connecting for a Better Community
44. Community Uplift Partnerships
45. Conservation Colorado
46. Cultivando
47. Denta Quest
48. Denver Metro Fair Housing Center
49. Elevations Land Trust
50. Families First
51. Family Tree
52. Groundworks Denver
53. Growing Home
54. Habitat for Humanity
55. HLF – Elder Law and Estate Planning
56. Innovage
57. Kids First Health Care
58. KIND - Kids in Need of Dentistry
59. Let Your Light Shine
60. Little Giant Learning Center
61. Maiker Housing Partners
62. Northern Denver Metro Small Business Development Center
63. Nueva de la Musica
64. PASCO - Personal Assistance Services of Colorado
65. Project Angel Heart
66. Quality Community Fund

67. Salvation Army
68. Spectra Centers, Inc.
69. St. Vincent De Paul
70. Star Girlz
71. The Senior Hub
72. Tri-County Health Department
73. Urban Land Conservancy
74. Urban Land Institute
75. Westminster Legacy Foundation

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

The CDBG Coordinator has yet to consult with numerous medical, inter-faith, and business communities. Time limitations are the main reason for not consulting with these organizations. In 2019, the CDBG Office intends to organize focus groups 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?
City of Commerce City Housing Needs Assessment 2018	City of Commerce City and Commerce City Housing Authority (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 & CCHA Affordable Housing Implementation Plan	City of Commerce City and Commerce City Housing Authority (CCHA)	Identified goals and strategies to implement housing diversity, affordability, and opportunities. Provides ideas for homelessness reduction.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
CCHA's 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.
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 future 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.
2016 Housing & Community Development Survey	City of Commerce City	This report summarizes the 210 surveys submitted for the 2016-2020 Consolidated Plan.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2018 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.
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	Commerce City	The preservation of historic sites, buildings, and activities within the City.
Walk.Bike.Fit	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.
Public Art Master Plan	Commerce City	Neighborhood revitalization
Analysis of Impediments to Fair Housing Choice	Adams County/Commerce City	Housing, market, and economic analysis. Neighborhood revitalization.
Health Impact Assessment - Derby Redevelopment	Commerce City	Neighborhood revitalization and area public services.
Mile High Greyhound Park Redevelopment Plan	Commerce City	Developer's plans to redevelop the former Mile High Greyhound Park.

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**

Advertisement for the public meetings targeted the general public, LMI households, racial/ethnic minority concentrations, and persons with limited English proficiency. Advance notice was given to residents through announcements in the local English and Spanish newspapers, *Commerce City Connected* newsletter, City's CDBG webpage, Facebook, Twitter, NextDoor, and Channel 8. Dates, times, and locations for the meetings are shown below:

Bilingual Public Input Meeting #1

Wednesday, January 23, 2019
6:00 pm – 7:30 pm
Eagle Pointe Recreation Center
Multipurpose Room A
6060 East Parkway Drive
Commerce City, Colorado

Bilingual Public Input Meeting #2

Thursday, March 28, 2019
6:00 pm - 8:00 pm
Small Business Resource Center
7270 Monaco Street
Commerce City, Colorado

Public Hearing

Monday, July 1, 2019
6:00 pm
Commerce City Civic Center
Council Chambers
7887 East 60th Avenue
Commerce City, Colorado

CARES Act Bilingual Public Input Webinar

Wednesday, April 15, 2020
10:30 am
Utilizing Zoom Webinar Software

CRN Webinar on COVID-19

Wednesday, April 29, 2020
10:00 am
Utilizing Zoom Webinar Software

The City also presented the CDBG program at nine other meetings as described previously. Input received through these meetings, and Project Idea Forms helped develop the projects identified in the AAP.

Following the development of the draft 2019 Annual Action Plan, the City of Commerce City held a 31-day public written comment from May 29, 2019, through Friday, June 28, 2019. During this time, copies of the draft 2019 AAP was available online and in the Target Area at the Civic Center, the Anythink Library, and Eagle Pointe Recreation Center for public inspection. Residents and other stakeholders were also encouraged in the *Connection* newsletter, the CDBG Webpage, and social through media to provide written comments.

A public hearing to present key plan components and receive comments was held as part of the regular City Council meeting on July 1, 2019. No written comments were received and considered prior to the adoption of the 2019 AAP.

Prior to project consideration and scoring, all citizen input was summarized and presented to the 2019 CDBG Team. All input related to the proposed funding projects was highlighted. The CDBG Team then used the citizen input in the project reviews, scoring, and rankings. The City Council also received a summary of all citizen input for their Study Session in June and their Regular meeting in July.

CARES Act Substantial Amendment

The City posted the proposed 2019 amendment on its official website – www.c3gov.com/CDBG. The opportunity to provide written comments on the Substantial Amendment was advertised with a 6-day notice in the *Commerce City Sentinel* all of its social media outlets, including Facebook, Twitter, Channel 8, and Nextdoor. A waiver was submitted and approved by omission to suspend the physical posting of the proposed amendment at physical locations in the City and to shorten the notice and comment periods.

Citizen Participation Outreach

Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
Public Meeting	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Residents in the Target Area</p>	Six attendees, 5 were residents. Please see attached Meeting Record in 1st Public Input Meeting attachment.	Special needs, elderly housing, home add-ons to accommodate elderly parents, Home Repair Program, Southside HOA group formation, domestic victims, business incubator at empty church.
Public Meetings	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> <p>Residents in the Target Area</p>	Five attendees, 3 were residents. One non-resident who work with the city, and two residents. Please see attached Meeting Record in 2nd Public Input Meeting attachment.	Difficulties communicating with the City, home repair loans with, 0% interest, payback upon selling, Bus stops between 56th and 72nd on Quebec, and better accessibility at 63rd and Monaco, ranking of CDBG applications performed and reallocating funds.
Public Hearing	<p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p>		TBD

Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
Website Outreach	Non-English Speaking - Specify other language: Google Translate - over 200 languages Non-targeted/broad community Entire City	Continually updated with information on CDBG projects. Received ____ Project Idea Form regarding ____.	Over 300 calls, letters, and emails received for the MHRP, AC WX, and/or PAT programs.
Commerce City Connected monthly 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. Please see Attachments for copies of the articles and ads.	
Social/ Digital Media	Non-targeted/broad community	Digital medial including: Facebook, Twitter, NextDoor, Channel 8, and the City's Website/CDBG page. Please see Other Outreach Materials attachment for samples of the outreach materials.	
Youth Commission Meeting	Under 18 residents	9 members in attendance	Positive response to the PAT and PRG programs.
Senior Commission Meeting	Area Seniors	5 members in attendance	Positive response to all HRP activities
Seniors Luncheon	Minorities Persons with disabilities Seniors	63 enrolled attendees	Six PAT applications received.
Public Meetings	Non-targeted/broad community	One Community Meetings run by the Police Department - 5 total in attendance. Discussed the CDBG program. See attached flyer in Other Meeting Attachments.	Crime prevention, lighting, domestic abuse, home repair programs,

Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
Neighborhood Outreach Barbeque Event	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community North Range Event	Approximately 2,000 attended these food, music and booth events Passed out CDBG material and fair housing material. <i>Please see photos and details in Other Meeting Materials attachment.</i>	None - materials present without a staff person to facilitate.
Community Resource Network Meeting	Higher education and area businesses	26 attendees representing 20 organizations.	Funding opportunities and emerging and existing CDBG funding programs.
City Council Study Sessions	City Council	Approximately 20 attendees.	Questions on the process to meet the highest residential needs. Question on why Senior Hub and Almost Home were not funded.
City Council Regular Meeting	City Council and the public	Approximately 30 in attendance plus staff and full Council.	No public comments received.
Online Webinar via Zoom	City residents and organizations	16 logged in attendees	Participants concerned with: access for undocumented residents, financial challenges of residents, especially the most vulnerable, making rent payments and keeping their home, and getting resources to the immigrant community.

With the concerns presented at the April 15, 2020, public input meeting, the City will seek to partner with a non-profit that can also assist undocumented residents with rent and mortgage assistance. The City has also initiated spending an additional \$500,000 of CARES Act funding from Adams County to assist residents with rent and mortgage assistance.

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

Introduction

Entitlement grant resources for 2019 are estimated at \$428,484. The 2019 grant will principally benefit LMI residents by providing safe, accessible, and energy-efficient housing, assist residents with disabilities, prevent homelessness, reduce crime, provide suitable living environments, and assist the City's elderly and youth.

Table 1 - Anticipated Resources

Expected Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan 2020
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	
CDBG	Public-Federal	Public Services Housing Economic Development Administration Fair Housing	\$428,484	\$ 0	\$0	\$428,484	\$425,000
CDBG-CV	Public - Federal	Prevent, prepare for and respond to the Coronavirus Administration	\$246,587	\$0	\$0	\$246,587	\$0

CARES Act Substantial Amendment 8725

#	Previous Allocation by Council	Original Category	AAP Year	Amount	Recommend Reallocation to 2019 AAP:	Category	Amount
1.	Sidewalk and ADA Curb Project	Public Facility	2016	\$16,982	DVV	Public Service – COVID-19 Related	\$16,982
2.	Sidewalk and ADA Curb Project	Public Facility	2017	\$11,169	DVV & PAT	Public Service - COVID-19 Related & Housing - COVID and Lead-based Paint Related	DVV - \$2,369 PAT - \$8,800
3.	Park, Recreation, and Golf Scholarship Program	Public Service	2017	TBD \$2,500 estimated	DVV	Public Service – COVID-19 Related	TBD \$2,500 estimated
Totals				\$30,651 estimated			\$30,651 estimated

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 leverage other resources to further the reach of the CDBG funds. The City anticipates working with various organizations and City departments to leverage the funding into the 2019 CDBG projects.

Specifically, through the 2019 AAP the City will leverage funds with:

- Audio Information Networks
- Groundworks Denver
- Brothers Redevelopment
- Arapahoe County Weatherization
- GRID
- Denver Metro Fair Housing
- Colorado Housing Connects
- City of Commerce City – PD and CD Departments

Specifically, through the CARES Act CDBG-CV funds, the City will seek to leverage funds by partnering with an existing, qualified organization for COVID-19 rent and mortgage assistance for city residents. Leveraging could come from similar but not identical housing support.

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

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 (DVV)	2016	2020	Non-Housing Community Development	Citywide	Public Services Supporting Low/Mod Income & Special Needs Populations: Crime Prevention, Homelessness Assistance	\$ 30,000 Plus \$21,851 estimated = \$51,851	Homelessness and crime prevention: 15 households plus 9 Households = 24 Total Households assisted/47 residents plus 35 residents = 83 residents
2	Public Services (AIN)	2016	2020	Non-Housing Community Development	Citywide	Public Services Supporting Low/Mod Income & Special Needs Populations: Blind and Low Vision residents	\$ 14,862	Assist Special Populations: 25 households assisted/79 people assisted
3	Public Services (GWD)	2016	2020	Non-Housing Community Development	Citywide	Public Service Supporting Low/Mod Income populations: Youth	\$ 19,410	Public Service: 5 households assisted/16 people assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Home Repair: (PAT)	2019	2021	Non-Homeless Special Needs	Citywide	Preserve & Expand Affordable Housing; Neighborhood Revitalization	\$25,000 Plus \$8,800 = \$33,800	Owner-occupied LMI housing rehabilitation: 11 households assisted/35 residents assisted. Lower number because of increased per-unit cost due to LBP and PPE increases.
5	Home Repair: (AC WX)	2019	2021	Affordable Housing	Citywide	Preserve & Expand Affordable Housing; Neighborhood Revitalization	\$ 75,000	LMI housing rehabilitation: 10 households assisted/31 residents assisted
6	Home Repair: (MHRP)	2019	2021	Affordable Housing	Citywide	Preserve & Expand Affordable Housing; Neighborhood Revitalization	\$ 178,515	Owner-occupied LMI housing rehabilitation: 20 households assisted/63 residents assisted
7	Administration & Planning	2019	2020	Non-Housing Community Development	Citywide	Administration & Planning	\$ 85,697	CDBG administration, plan preparations, FHEO outreach

Table 2 – Goals Summary

CARES Act Substantial Amendment Goal Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Public Services	2019	2022	Affordable Housing	Citywide	Public Services Supporting Low/Mod Income & Special Needs Populations: Homelessness Prevention	\$ 220,000	Homelessness prevention-COVID-19 Rent & Mortgage Assistance 80 households assisted (if \$2,500 each) 80 * 3.15 = 252 residents assisted
9	Administration & Planning	2019	2022	Non-Housing Community Development	Citywide	Administration & Planning	\$ 26,587	CDBG administration, plan preparations, FHEO outreach

Table 2a – CARES Act Substantial Amendment Goal Summary

Goal Descriptions

1	Goal Name	Public Services - DVV
	Goal Description	To provide Domestic Violence Victims financial support with temporary housing & utility payments.
2	Goal Name	Public Services – Audio Information Network of Colorado - AIN
	Goal Description	Provide bilingual audio services for the blind and reading disabled.
3	Goal Name	Public Services – Groundworks Denver - GWD
	Goal Description	Provide city youth with paid positions to gain job skills and abilities while working on area neighborhood projects.
4	Goal Name	Home Repair Program - PAT
	Goal Description	Paint the exterior of homes, make accessibility improvements, and perform yard clean-ups for disabled and senior homeowners.
5	Goal Name	Home Repair Program - AC WX
	Goal Description	Provide weatherization services including energy audits, health and safety assessments, insulation, combustion appliance repairs, and replacements for LMI households.
6	Goal Name	Home Repair Program - MHRP
	Goal Description	To help single-family, LMI homeowners make needed home repairs to meet health, safety, accessibility, and energy efficiency needs.
7	Goal Name	Administration and Planning
	Goal Description	Administration and planning functions associated with the CDBG program. Fair Housing law outreach and training.

Table 3 - Goal Descriptions

CARES Act Substantial Amendment Goal Description

8	Goal Name	Public Services – CV- Rent and Mortgage Assistance
	Goal Description	To provide rent or mortgage assistance to LMI residents impacted COVID-19 pandemic through the direct payment of their rent or mortgage to their landlord or mortgage company. Per federal regulations, these emergency payments cannot exceed three months, nor can they pay for the tax component of the mortgage payment
	Goal Description	To provide emergency assistance to LMI residents to remain in their homes by relieving financial shortages due to COVID-19 thus avoiding homelessness through eviction or foreclosure.
9	Goal Name	CV-Administration and Planning
	Goal Description	Administration and planning functions associated with the CDBG-CV program. Fair Housing laws outreach and training.

Table 3a – CARES Act Substantial Amendment Goal Descriptions

AP-35 Projects – 91.220(d)

Introduction

The 2019 AAP projects are identified below.

Projects

#	Project Name
1	Domestic Violence Victim Support
2	Audio Information Network of Colorado
3	Groundworks of Denver
4	Brothers Redevelopment's Paint-a-Thon Program
5	Arapahoe Co. Home Weatherization Program
6	Minor Home Repair Program
7	CDBG Program Administration & Planning

Table 4 – Project Information

CARES Act Substantial Amendment Projects

#	Project Name
8	CV-Rent and Mortgage Assistance Program
9	CV-CDBG Program Administration & Planning

Table 4a – CARES Act Substantial Amendment Project Information

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

Supporting and funding the projects listed above allows the City to address several underserved needs. All of the listed 2019 CDBG projects meet a high priority need, goal, and objective as outlined in the City's ConPlan. The 2019 allocation priorities were based on the intense response to the HRPs, input received from the City, residents, City staff, area non-profit organizations, and the "other local/regional/state/federal planning efforts considered when preparing the Plan" listed previously in AP-10. Recent US Census and ACS data, visual inspections by City staff, the current needs of special populations, approved plans

and studies and non-housing community development needs also guided allocation priorities.

Growth

The City's rapid growth rate escalates and intensifies the identified needs. The City has the highest percentage increase in population in the Denver Metro Area. The estimated population as of January 1, 2019, was 59,433, which is an increase in the growth rate of 3.8% since January 1, 2018. In comparison, the Denver-Aurora CSA population change was under 2%. Since 2000, the City's population has **grown by 183%**, moving from 20,991 to 59,433. Colorado's population increase during the same period was only 34 percent.¹

The City's senior population has grown rapidly. From 2000 to 2017, the number of persons aged 65 and older grew by 119 percent. This rate of growth is higher than elsewhere in the region.²

The homeless population has **almost doubled** from the previous year. The January 29, 2018, Adams County Point in Time homeless count reached 466 individuals. This was up 196 percent from 2017's number of 157 individuals and 133 percent from 2016's number of 200 homeless individuals. Forty-four percent of the homeless households counted in 2018 were families with at least one child.

Housing Affordability

In 2007, the median sales price of a home in Commerce City was affordable based on median household income. By 2015, home prices *more than doubled* while income rose only 29 percent. The relentless increase in housing costs and the shortage of housing in Commerce City and the Denver Metro Area is largely caused by: the extreme population growth rate, the construction defect laws enacted in 2008, and the current construction of a commuter rail line through Commerce City.³

The City also recognizes the hidden population of undocumented immigrants. Using the 2014 population estimate showing an additional 3.8% of statewide residents as undocumented⁴. Therefore, in 2019, the City has an estimated 2,258

¹ World Population Review, Colorado Population 2019.

² City of Commerce City 2018 Housing Needs Assessment, Prepared by Civatas, LLC.

³ "

⁴ *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/>

additional undocumented residents. Utilizing the person per household average of 3.15, The City needs an additional 176 homes to house undocumented residents. All of the conditions described previously amplify the pressures on LMI residents when finding decent and affordable housing within their price range.

The need for additional housing rehabilitation is also born out in the response to the Home Repair Program launch in January of 2019. During the last 17 weeks (as of May 24, 2019), sixty-five applications have been received. Fifty-one of the applications requested MHRP, thirty-two requested AC WX and twenty-six requested PAT.⁵ These applications will utilize all of the HRP funding already allocated in the 2017 and 2018 AAPs. This demonstrates the extreme need for LMI home rehabilitation and the need for additional HRP funding.

The DVV also combats homelessness. In 2018, 300 victims needed housing assistance to avoid homelessness.⁶ When an individual or family is facing a domestic assault crisis, the DVV programs provide temporary housing and utility relief to help keep the victim(s) from becoming homeless.

CARES Act Substantial Amendment

The City is utilizing their special allocation of CDBG-CV funding to combat the severe economic impact on residents by the economic crisis caused by the COVid-19 pandemic. To prevent the spread of the virus, Governor Polis order all non-essential businesses to close, for essential businesses to limit their exposure to the public and fellow workers, and for everyone else to stay at home. The need for non-essential business closures, the stay-at-home orders, and the natural fear of contracting or spreading the virus closed down the economy.

During April of 2020, just a few weeks after the national disaster was declared, the Bureau of Labor Statistics reported the national unemployment rate reached 14.7%, which is the highest since the Great Depression. Colorado's Unemployment rate was 11.3% and Adams County has an unemployment rate of 12.4% (33,528 unemployment claims) during the same period. This made Adams County the fifth-highest county with unemployed residents in the state.⁷ These numbers do not reflect residents who did not or could not file for unemployment.

After consultation with neighboring communities, Adams County, and city departments, the City Manager's Office recognized the deep need to assist

⁵ The applicants may apply for one or all of the HRP's project – this is why the total individual project applications exceeds the number of applications received.

⁶ Kim Messina, City of Commerce City Police Department, Victim Services Unit Manager, 2019.

⁷ LMI Gateway.com - Colorado Department of Labor and Employment, May 31, 2020

residents and businesses bridge the hopefully short-term, dramatic loss of household income.

The City then established goals for expedient and substantial financial assistance for residents and businesses. The City dedicated approximately \$1,000,000 in non-CDBG funds for loans and grants to businesses and non-profits located in the City. To assist residents and meet their needs in an impactful way, the City will use their CDBG and CDBG-CV funds to partner with an established organization(s) that provides rent and mortgage assistance. The City may also allocate an additional \$500,000 in non-CDBG funds towards rent and mortgage assistance.

Obstacles

The obstacles in implementing the City's 2019 AAP consists of executing all of the projects in a timely manner. The extreme response in the HRP's and the newness of the program to the City has provided a learning curve for the CDBG Office. As HRP's policies and procedures emerge coordination difficulties between the three organizations and the City will subside.

Spending CDBG funding has challenged the CDBG Office and the City. Moving the 2016 and 2017 Sidewalk Project and the HRP's forward will be the highest priority.

The 2019 AAP brings in two new Subrecipients to the CDBG Program. They will require technical training, Agreements, environmental reviews, and monitoring. While the City is excited to partner with new organizations it realized there will be delays in launching each new program.

Responding to COVID-19 obstacles include moving with speed while not exactly duplicating services paid for by other funding sources. The HUD waivers will help speed up the CDBG substantial amendment processes and the flexibilities will assist in expanding the use of the funds available.

AP-38 Project Summary

Project Summary Information

In March of 2019, six qualified funding applications were received for CDBG *Public Service* programs. Six criteria measured the submitted applications:

1. Meets an identified goals and needs in the Consolidated Plan,
2. Overall benefit to the City,
3. Applicant's experience and ability,

4. Number and percentage benefit to LMI residents,
5. Amount of leverage funding for the project, and
6. Corresponds to an approved City plan.

Balancing the 15% *Public Service* project cap and need to keep the City's CDBG Program administrable; with the pressing needs of the community, the City limited the total number of public service projects to three. Two of the recipients are non-profit agencies (Subrecipients) and one recipient is a City department.

The CDBG Team recommends the remaining funds go to the three HRPs. These programs are already established and have a high rate of demand.

	Subject	Project Details
1	Project Name	Public Services – Domestic Violence Victims
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public services supporting LMI and special need populations
	Funding	\$51,851
	Description	Through the Police Department's Victim Services Department – provide temporary financial support for housing and utilities for domestic violence victims and their dependents.
	Target Date	March 31, 2021
	Estimate the number and type of persons that will benefit from the proposed activity	26 households will benefit. Using the City's average per household multiplier of 3.15 approximately 82 victims of domestic violence will benefit (includes family members).
	Provider Location	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, COVID-19 response and prevention, and moving-related expenses.
2	Project Name	Public Services – Audio Information Network
	Target Area	Citywide
	Goals Supported	Public Services – Special Populations
	Needs Addressed	Public services supporting LMI and special need populations
	Funding	\$14,862
	Description	Provide bilingual audio services for the blind and reading disabled.
	Target Date	March 31, 2021
	Estimate the number and type of persons that will benefit from the proposed activity	25 households. Using the 3.15 multiplier equals 79 residents assisted.
	Provider Location	1700 55 th Street, Suite A Boulder, CO 80301
	Planned Activities	Provide bilingual audio services for the blind and reading disabled. COVID-19 response and prevention for employees, volunteers and clients.
3	Project Name	Public Service – Groundworks Denver

	Subject	Project Details
	Target Area	Citywide
	Goals Supported	Public Services – Youth Services
	Needs Addressed	Public services supporting LMI youth
	Funding	\$19,410
	Description	Provide city youth with paid positions to learn job skills and abilities while working on area neighborhood projects.
	Target Date	March 31, 2021
	Estimate the number and type of persons that will benefit from the proposed activity	5 households, 16 residents assisted; and area-wide projects
	Provider Location	3280 N. Downing Street, Unit E Denver, CO 80205
	Planned Activities	Provide job skills training, leadership and management training to five City youths as part of a team to perform environmentally based neighborhood projects. COVID-19 response and prevention for employees, volunteers and clients.
4	Project Name	Brother's Redevelopment's Paint-a-Thon Program
	Target Area	Citywide
	Goals Supported	Housing: Minor Home Repair
	Needs Addressed	Preserve and Expand Affordable Housing Public Services for Low-income/Special Needs Senior Services Neighborhood Revitalization
	Funding	\$33,800
	Description	Paint the exterior of homes, accessibility improvements, and yard clean-ups, for disabled and senior homeowners.
	Target Date	June 30, 2021
	Estimate the number and type of persons that will benefit from the proposed activity	11 households. Assists 35 residents.
	Location Description	LMI households located Citywide with a focus on the Target Area.

	Subject	Project Details
	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. COVID-19 response and prevention for employees, volunteers, and clients.
5	Project Name	AC WX Home Weatherization
	Target Area	Citywide
	Goals Supported	Housing: Minor Home Repair
	Needs Addressed	Preserve and Expand Affordable Housing Neighborhood Revitalization
	Funding	\$75,000
	Description	Energy efficiency home projects for LMI, single-family, homeowners.
	Target Date	September 30, 2021
	Estimate the number and type of persons that will benefit from the proposed activity	10 households. 31 residents will benefit
	Location Description	LMI households located Citywide with a focus on the Target Area.
	Planned Activities	Provide weatherization services including energy audits, health and safety assessments, insulation, combustion appliance repairs, and replacements. COVID-19 response and prevention for employees, volunteers, and clients.
6	Project Name	2019 Minor Home Repair Program
	Target Area	Citywide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve & Expand Affordable Housing, Neighborhood Revitalization
	Funding	\$178,515
	Description	Owner-occupied, housing rehabilitation for LMI residents
	Target Date	September 30, 2021
	Estimate the number and type of persons that will benefit from the proposed activity	Rehabilitate 20 single-family, owner-occupied homes; assisting 63 residents

	Subject	Project Details
	Location Description	LMI households located Citywide with a focus on the Target Area.
	Planned Activities	Hire a contractor to assist the City with the administration and rehabilitation of LMI, single-family, owner-occupied homes to meet health, safety, accessibility, and energy efficiency needs. COVID-19 response and prevention for employees, volunteers, and clients.
7	Project Name	CDBG Program Administration & Planning
	Target Area	City Wide
	Goals Supported	Not applicable
	Needs Addressed	Not applicable
	Funding	\$85,697
	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	September 30, 2021
	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	CDBG administration, regulation compliance, outreach, community education, document preparation, and CDBG office management. COVID-19 response and prevention for employees, volunteers, and clients.

Table 5 - Project Summary Information

CARES Act Substantial Amendment		
	Subject	Project Details
8	Project Name	Public Services – CV-Rent and Mortgage Assistance
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public services supporting LMI and special need populations
	Funding	CDBG-CV \$220,000
	Description	To provide rent or mortgage assistance to LMI residents impacted COVID-19 pandemic through the direct payment of their rent or mortgage to their landlord or mortgage company. Per federal regulations, these emergency payments cannot exceed three months nor pay for the tax portion of the mortgage payment. Approximately \$20,000 will be used by the SubRecipient for activity delivery costs.
	Target Date	March 31, 2022
	Estimate the number and type of persons that will benefit from the proposed activity	80 households will benefit, if they receive on average \$2,500 per home. Using the City's average per household multiplier of 3.15 approximately 252 residents will benefit.
	Provider Location	Civic Center, CDBG Office, 7887 E. 60 th Avenue, Commerce City, CO 80022 and TBD
	Planned Activities	Temporary payment of rent or mortgage costs
9	Project Name	CV- Administration & Planning
	Target Area	City Wide
	Goals Supported	Not applicable
	Needs Addressed	Not applicable
	Funding	CDBG-CV \$26,587
	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	September 20, 2022
	Estimate the number and type of persons that will benefit from the proposed activity	Not applicable

CARES Act Substantial Amendment		
	Subject	Project Details
	Provider Location	7887 E. 60th Avenue, Commerce City, CO 80022
	Planned Activities	CDBG administration, regulation compliance, outreach, community education, document preparation, and CDBG office management. COVID-19 response and prevention for employees, volunteers, and clients.

Table 5a – CARES Act Project Summary Information

Allocation Changes

All allocated funding amounts in the 2019 AAP are contingent upon the City receiving the HUD CDBG estimated at \$424,484. Should any of these projects not utilize all or part of their allocated funding amount, such as applicant withdraw or project changes, the unused funds will be reallocated. The City will follow the Citizen Participation Plan to perform the reallocation. If the HUD grant is less than estimated, the omitted funding will be reduced from the MHRP.

All allocated funding amounts in the CDBG-CV funds are contingent upon the City receiving the estimated at \$246,587. Should these projects not utilize all or part of their allocated funding amount, such as applicant withdraw or project changes, the unused funds will be reallocated to another CARES Act authorized project. The City will follow the Citizen Participation Plan to perform the reallocation.

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 40 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

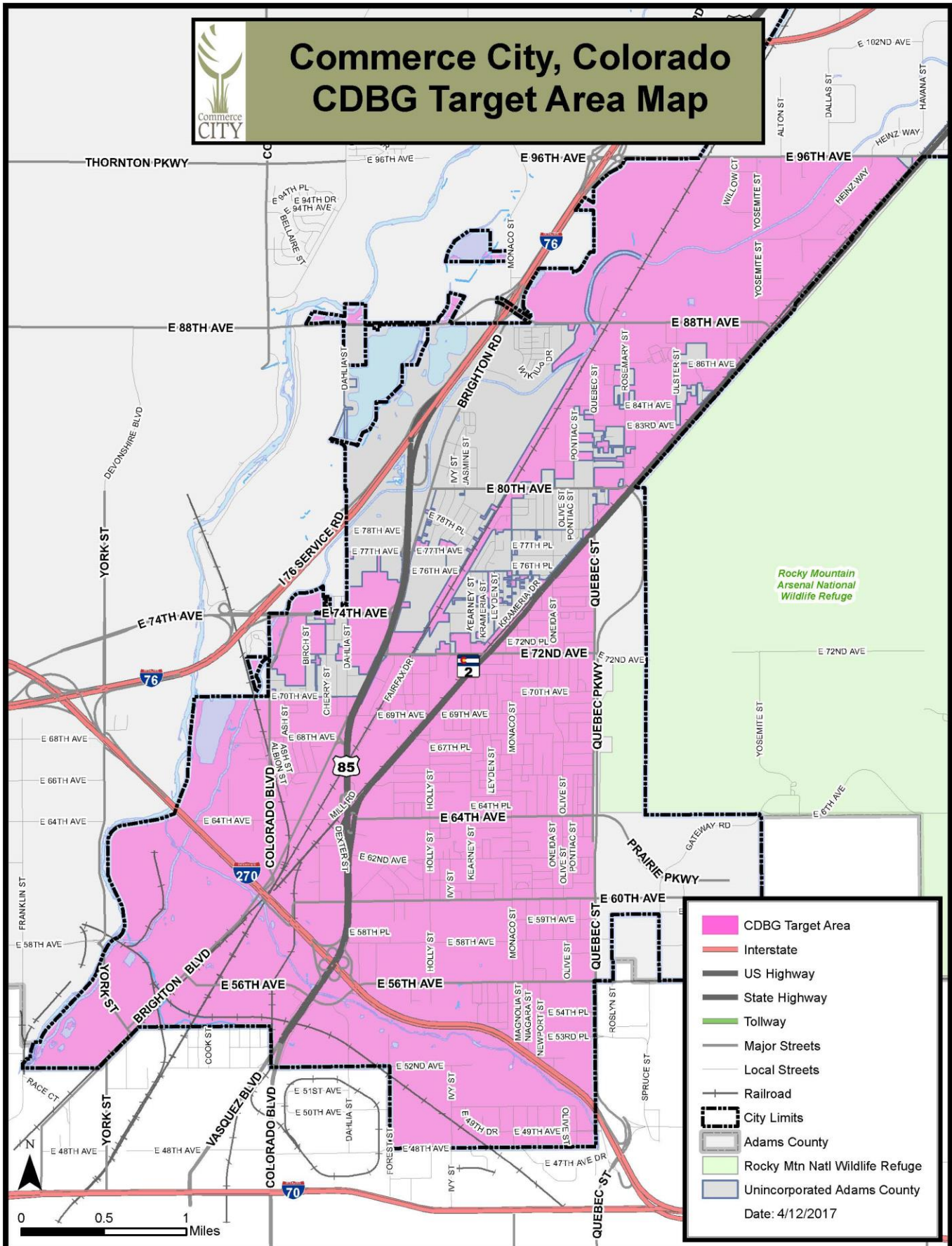
The following four maps depict:

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

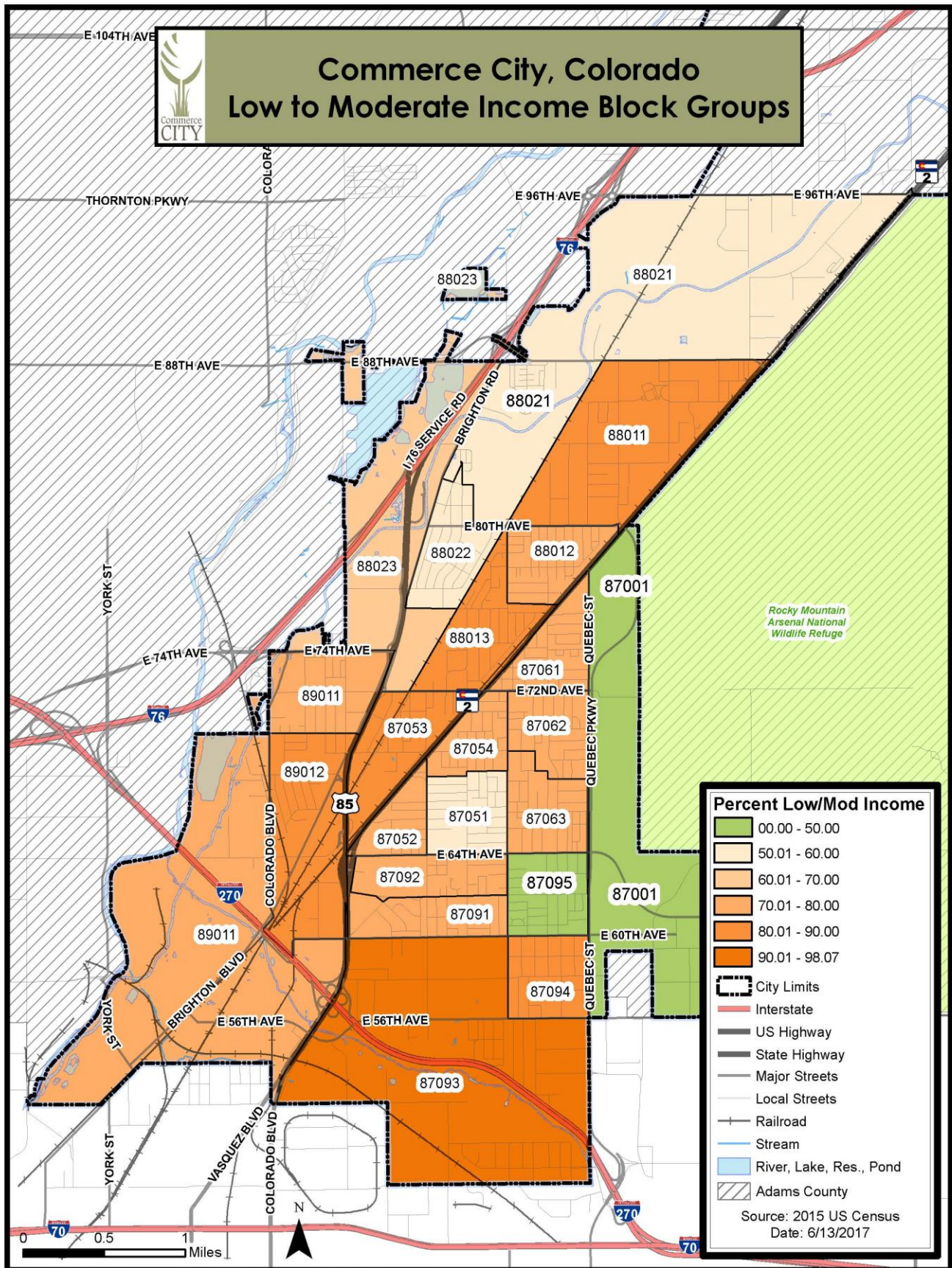
The projects working in the Target Area are prioritized for the allocation of CDBG resources. However, individual LMI and several special population residents residing throughout the City may be eligible for CDBG funds.



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 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.

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 2019 AAP's development processes. Last year'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 a phenomenal demand for the HRPs directed the 2019 AAPs housing priorities.

To meet these needs for our residents, the 2019 AAP will continue and increase the funding for the HRPs to assist another 42 homes. The CDBG will continue to manage the MHRP and coordinate with the AC WX project and PAT programs.

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/At-risk of Homelessness (DVV)	26
Non-Homeless (MHRP + AC WX)	30
Special-Needs (PAT)	11
Total	67

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

One Year Goals for the Number of Households Supported Through...	
Rental Assistance	26
The Production of New Units	0
Rehab of Existing Units	41
Acquisition of Existing Units	0
Total	67

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

CARES Act Substantial Amendment Goals

One Year Goals for the Number of Households to be Supported	
Homeless/At-risk of Homelessness	80
Non-Homeless	
Special-Needs)	
Total	80

Table 7a - One Year Goals CARES Act Funding for Housing Assistance by Support Requirement

One Year Goals for the Number of Households Supported Through...	
Rental Assistance (and mortgage)	80
The Production of New Units	
Rehab of Existing Units	
Acquisition of Existing Units	
Total	80

Table 8a - One Year Goals CARES Act Funding for Housing Assistance by Support Type

Discussion

Four of the six 2019 AAP projects involve affordable housing. The DVV program provides emergent, temporary housing assistance to prevent 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 steady supply of improved, decent, safe, and relatively affordable housing will enter the market. All three of the HRPs will improve the:

- a. health of the home's occupants,
- b. safety of the home,
- c. accessibility of the home,
- d. value and economic security of the home,
- e. ability of seniors to age in place, and/or
- f. energy efficiency of the property

The MHRP will grant up to \$8,700 in work, permits, fees and contract administration to rehabilitate approximately 20 LMI single-family, owner-occupied homes. The City expects to again engage the services of a home repair contractor to continue to assist in the operations of the fourth 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. Educational and referral components of the MHRP 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 12 homes, improve accessibility, and provide yard clean-up for the disabled and/or seniors home owners. This subrecipient will advertise, promote, qualify, equip, and organize the volunteers for each home. The CDBG funds are used to purchase the paint and supplies to perform the above activities.

The Arapahoe County Weatherization Program (AC WX) will provide weatherization services to income eligible household. Services begin with an energy audit of the home to determine the needed energy conservation measures for the home. As needed, they replace combustion appliances (mainly furnace and water heaters) and insulate the home.

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.

CARES Act Substantial Amendment seeks to assist residents that have lost a significant amount of household income due to the COVID-19 pandemic. The goal is to reduce the risk of homelessness by bridging the income loss with CDBG-CV funds until the household can financially recover.

AP-60 Public Housing – 91.220(h)

Introduction

Commerce City residents are served by both the Unison Housing Partners (formerly Adams County Housing Authority) and the Commerce City Housing Authority (CCHA). Unison 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 and was immediately fully occupied.
- 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 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 "High Performer" based on its 2019 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:	2/19/2019	
PHA Code:	CO058	
iPHA Name:	Adams County Housing Authority	
PHAS Indicators	Score	Max

Physical	25	40
Financial	22	25
Management	34	25
Capital Fund	10	10
Late Penalty Point(s)	0	
PHAS Total Score	91	100
PHAS Designation	High Performer	

Table 9 – Unison Housing Partners (formerly Adams County Housing Authority) 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 through the 2019 AAP to address homelessness and other special needs. The 2016-2020 Consolidated Plan, considers homelessness and other special population needs as a high priority for the City's CDBG program.

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

The City will:

1. Provide \$51,851 in funding to the Commerce City/Brighton Police Department's joint Victim Service Unit Domestic Violence Victim Program (DVV). Half of the 599 domestic violence victims assisted in 2018, 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 and utility costs. The CDBG funding will assist approximately 26 households (82 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 cope with the increases.

2. Provide \$253,515 to the Minor Home Repair Program and the Arapahoe County Weatherization programs to help 30 LMI families rehabilitate and weatherize their homes. This will extend the life 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 \$25,000 to the Paint-a-Thon program to help approximately 12 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 costs of COVID-19 and the new Lead-based Paint regulations, Brother's Redevelopment has requested additional funds. They will need an additional \$800 per household on average to pay for on-site PPE, 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.
6. In 2019, the QCF awarded \$51,000 in food, housing, and homelessness assistance. The City also provided in-kind services including the staff to run the foundation and support appointed QCF Board.

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.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City has allocated DVV program funding from the past three years' AAPs. Totalling \$103,791, 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

In Commerce City, Access Housing operates a rapid rehousing program designed to shorten the time 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 and moving families into their two apartment buildings.

In 2018, the CDBG Office established a working relationship with Access Housing staff and Board. The CDBG Office continues to encourage Access Housing to apply for CDBG funding.

Additional efforts will be made to further network with and assist Almost Home, Cultivado, CASA of Adams & Broomfield Counties, Catholic Charities, 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

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, Colorado Coalition for the Homeless, Inter-Faith Community Services, Homeless No More, STRIDE, Adams County HHS, Commerce City, and Adams County Housing Authority.

CARES Act Substantial Amendment

To assist residents to avoid eviction or foreclosure due to the impacts of the COVID-19 pandemic, the City will use their 2019 CDBG and CDBG-CV funds to partner with an established organization(s) that provides rent and mortgage assistance. The City may also allocate an additional \$500,000 in non-CDBG funds towards rent and mortgage assistance.

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

Introduction:

Rapid Rise in Housing Costs

The most significant barrier to affordable housing in Commerce City is the skyrocketing cost of housing. Housing costs have far outpaced the rise of the City's median income. In 2007, Commerce City's homes were affordable for middle-income families. Since then the median sales price for the same home has more than doubled while average household income has only grown 29 percent. Nearly one-third of households in Commerce City, a figure that represents 5,000 plus households, now pay more than 30 percent of their income on housing costs.⁸

⁸ City of Commerce City 2018 Housing Needs Assessment, Prepared by Civatas, LLC.

In 2017, there were 918 single-family detached homes sold in Commerce City, with an average sales price of \$338,413. Comparatively, 120 town-homes and condominiums sold during the same year at an average price of \$258,864. Median sales prices have been steadily increasing in Commerce City by about \$25,000 to \$50,000 per year. Between 2014 and 2017, the median sales price for single-family homes increased by 46 percent. If this trend continues unabated, the median sales price in Commerce City could reach between \$450,000 and \$550,000 or even higher by 2022.⁹

Forty-four percent of the Core City renters were cost-burdened, spending 30 percent or more of their income on housing.¹⁰

Overall Housing Shortage

Based on Commerce City's average household size of 3.15 people, the City's 57,256 residents would require approximately 18,177 housing units, however, between 2013-2017, the ACS estimates the figure was 15,240 units. Adding in two years of housing construction based on the City's average, this represents a shortfall of over 2,327 units or 17.0%. When you add the estimated hidden population of 2,176 undocumented immigrants (3.8%¹¹), another 690 homes are needed, for a total estimated housing shortage of 3,018 units.

Subsidized housing, especially apartments for seniors, seldom has vacancies. The waiting lists for the Housing Choice Vouchers in Commerce City have been closed since 2014.¹²

High Housing Development Costs – Tap Fees

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's prices are outside of the City's control. The CDBG Office will seek to assist the Community Development Department and the CCHA with the cost of tap fees in future developments. This will help attract affordable housing and lower the housing overall costs.

Rapid Increase in Population and Lack of Future Housing

⁹ City of Commerce City 2018 Housing Needs Assessment, Prepared by Civatas, LLC.

¹⁰ City of Commerce City 2018 Housing Needs Assessment, Prepared by Civatas, LLC.

¹¹ American Immigration Council, Immigrants in Colorado, October 4, 2017.

¹² Tracy Jones, Commerce City Housing Authority Manager, 2019.

Between 2010 and 2016, the City produced on average 305 units annually, less than half the forecasted housing need. With population projections provided by the Denver Regional Council of Governments and using a conservative average household size of 3.4, Commerce City will need about 700 housing units annually to meet the need.

Affordable Housing Shortage/Diverse Housing Shortage

In 2007, Commerce City did not have a housing affordability gap. That year the median sales price of a home in Commerce City was \$109,872. Households earning 80 percent of the area median household income could afford a home listed at or below the median sales price. That meant a household earning 100 percent of the median household income could afford a home valued at more than \$150,000.

Today, households earning 100 percent median household income could no longer afford a median-priced home in Commerce City.

With the intense population growth, the addition of new housing, and especially “Middle Housing” units, have not kept pace. “Middle Housing” residents are typically buyers new to homeownership, empty-nesters seeking to downsize, single-parent families seeking lower maintenance and lower-cost housing. The result is a scarcity of diverse housing which, in turn, driven up prices.

These units assist middle- to low-income households and are approximately \$80,000 less expensive than single-family homes in Commerce City. Additionally, the median price increases at a slower pace, keeping them more affordable over time. The scarcity of “Middle Housing” homes in the City is largely due to the Colorado Construction Defect Action Reform Act (CDARA) other related laws have exacerbated the shortages of the needed “Middle Housing”. Designed to protect homebuyers from defective housing construction, they allow class-action lawsuits in perpetuity from as few as two homeowners against a builder or other construction industry professional.

As a result, the industry can no longer secure affordable insurance. Condominium and townhome construction has plummeted because of the high risk of litigation and the associated costs of insurance. If this type of “Middle Housing” is constructed, it exceeds a \$400,000 per unit price point to cover the builder’s risk and insurance costs. This price point is above the area per home average cost and is well above what any LMI household can afford. These laws are a huge barrier to affordable housing.

Single-family detached units make up 76 percent of the city's housing stock, with 86 percent in north Commerce City. Renters make up nearly one-third of households, and most live in the southern historic city. There are few affordable rentals and little by way of appropriate housing for seniors or those with special needs.

Deterioration of Affordable Housing Stock

The preservation of older, existing housing stock ensures it will remain available to working families. The City will reinvest in existing, aging housing stock to stabilize neighborhoods for current resident occupants, especially seniors aging in place.

Actions 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. The 225 owner-occupied manufactured homes are also part of the Home Repair Programs. This AAP will assist the City to rehabilitate 42 homes in 2020 – 2021. 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.”¹³

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.

¹³ City of Commerce City Housing Needs Assessment 2018, Prepared by Civatas, LLC.

AP-85 Other Actions – 91.220(k)

Introduction:

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 such as medical visits.

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 OSHA, 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 off-set 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 more job opportunities than there are households in the city. In this case, there are two jobs per household.

With the improved national and local economies, unemployment is at its lowest levels in decades – 2.9%.

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, 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 strong local economy, low wages are a concern. ACS estimates the City's 2016 poverty level is 13.4%. Lower education levels, race, sex,

and the number of female heads of households help explain the number of poverty-level families.

In 2017, men made approximately 1.33 times more than female employees. In Colorado, the average male salary was \$68,531 while the average female salary was \$51,692.¹⁴ 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, the 2012-2016 Median Earnings by Education Attainment demonstrated residents with less than a high school diploma made \$29,219. A resident with some college made 35% more, and a resident with a bachelor's degree made 78% 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 with a 39% percent dropout rate.¹⁵ Fewer than 6 percent of those in the city's historic city 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.¹⁶

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, and business 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 2019 AAP timeline.

¹⁴ Data USA, Commerce City, Colorado, ACS PUMS 5-year Estimate.

¹⁵ Note: The Derby neighborhood houses Lester Arnold High School, which is an alternative school for at risk youth.

¹⁶ City of Commerce City Housing Needs Assessment 2018, Prepared by Civatas, LLC.

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. Area governments, the CRN, public, and private housing and social service agencies enhance coordination in the implementation of the Consolidated Plan. Actions include:

1. Offering technical assistance to agencies on available funding sources, associated timelines, applicable requirements, and the most impactful uses of funds.
2. Participating in regional efforts and meetings with public and private housing, educational entities, economic development organizations, social service agencies, and other governments.
3. Providing pre-application 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 state-wide CDBG User Group.
6. Continue membership in the NCDA.
7. The COVID-19 rent and mortgage assistance program with coordinate the City, with Adams County (and/or a non-profit organization) and will use public funding to directly pay private landlords and mortgage companies.

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 2019 Annual Action Plan is 70%.

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 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: | |

70% during 2019 AAP (October 1, 2019 – September 30, 2020)

The CARES Act CDBG Funding will follow the federal requirements for minimum LMI benefit. It is anticipated that 100% of the rent and mortgage assistance program will serve LMI households.

Discussion:

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.

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.

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