



City of Commerce City,
Colorado

Community Development Block Grant

2020 Consolidated Annual Performance and
Evaluation Report (CAPER)

DRAFT

City of Commerce City
Community Development Department
Commerce City Civic Center
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CR-05 - Goals and Outcomes

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

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

The City of Commerce City (C3) is a US Department of Housing and Urban Development (HUD) entitlement jurisdiction receiving an annual allocation of Community Development Block Grant (CDBG) program funds. These funds help the City address the housing and community development objectives outlined by HUD, which are primarily targeted for low- to moderate-income (LMI) and special needs populations. The City has successfully implemented activities that further its goals addressing the priority needs identified in the City's Consolidated Plan and Annual Action Plan. Further, in PY 2020 the City was allocated CARES Act funds to address the needs created by the COVID-19 pandemic. CDBG-CV funds are tied to activities that prevent, prepare for and respond (PPR) to COVID-19. These are summarized below and further at the end of this section. The accomplishments for PY 2020 are highlighted below.

Minor Home Repair: In PY 2020 the City assisted 27 LMI owner-occupied households with single-family housing rehab activities through the Minor Home Repair Program (MHRP). There were also 10 LMI owner-occupied households assisted through the Paint-a-Thon (PAT) program with Brother Redevelopment.

Public Services and Homeless Prevention: The City and its partners assisted 360 LMI persons with vital public services that helped to improve their quality of life. These included services for persons with a disability at the Audio Information Network, LMI youth at Groundworks Youth, and the Commerce City Police Department's Domestic Violence Victim Support Program (DVV) which helped 26 households consisting of 86 victims of domestic violence avoid homelessness. Finally, with CDBG-CV the City with its two service providers, Almost Home and Access Housing, assisted a total of 246 LMI persons with rental and mortgage subsistence payments. These households were financially affected by the pandemic, and emergency payment assistance for rents and mortgage payments helped them avoid homelessness in this time of crisis.

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

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

Goal	Category	Source	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration and Planning	Non-Housing Community Development	CDBG	Other	Other	1	1	100.00%	1	1	100.00%
Affirmatively Further Fair Housing Choice	Fair Housing	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	80	80	100.00%			
Business Development		CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	200	140	70.00%			
Construction of ADA Ramps	Non-Housing Community Development	CDBG	Other	Other	10	6	60.00%			
Demolition and Clearance	Non-Housing Community Development	CDBG	Buildings Demolished	Buildings	2	0	0.00%			
Drainage Improvements	Non-Housing Community Development	CDBG	Other	Other	1	0	0.00%			
Job Training		CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	40	0	0.00%			
Local Bus Stop Improvements	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	300	0	0.00%			

Minor Home Repair	Affordable Housing	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	12	106	883.33%	21	37	176.19%
Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250	740	296.00%	506	360	71.15%
Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	120	0	0.00%			
Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG	Homelessness Prevention	Persons Assisted	129	154	119.38%			
Revolving Loan Fund		CDBG	Businesses assisted	Businesses Assisted	8	9	112.50%			
Sidewalk Construction and Repair	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3985	5650	141.78%			

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

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

In PY 2020 the City focused on affordable housing preservation and public services. Repairs through the MHRP included plumbing, electrical, foundational, furnace, and hot water replacements, roof replacements, and several structural repairs. Activities with PAT included exterior painting, disposable cleanups, lead-based paint hazard testing, accessibility improvements, and yard cleanup. Public services included activities that assisted persons with a disability at the Audio Information Network, LMI youth at Groundworks Youth, and the Commerce City Police Department’s Domestic Violence Victim Support Program (DVV) which helped victims of domestic violence avoid homelessness. The City also addressed the needs of residents affected financially by the COVID-19 pandemic and were unable to make payments on their homes. This resulted in the creation of the CDBG-CV Rental and Mortgage assistance program which was carried out by two service providers, Almost Home and Access Housing. See further below for CARES Act activities in PY 2020.

Below is a list of goals in PY 2020 for CDBG (EN) and expenditures towards the goals:

Administration and Planning: \$65,955 (17.6%)

Minor Home Repair: \$223,687 (59.6%)

Public Services: \$85,854 (22.8%)

TOTAL CDBG (EN): \$375,496

Goals to Accomplishments Comparison

Administration and Planning: Fair housing efforts are made from the City's CDBG Administrative budget. Along with the duties of administering the CDBG program, staff also participated in training and ongoing learning of HUD programs and guidance.

Minor Home Repair: The City had a goal for 21 LMI households to be assisted through housing rehab activities. There were 37 LMI households assisted through housing rehab programs funded by the City.

Public Services: The City had a goal to assist 506 LMI persons with public services in PY 2020. Unfortunately, the City didn't reach this goal as it focused on emergency CDBG-CV rental and mortgage assistance activities. In total, there were 360 LMI persons assisted in the program year. The City hopes to report more public services in the near future as there are several open activities awaiting accomplishments from the City's contracted service providers.

CARES Act Accomplishments

Utilizing CDBG-CV funds, the City with its two service providers, Almost Home and Access Housing, assisted a total of 246 LMI persons with rental and mortgage assistance subsistence payments. These households were financially affected by the pandemic, and emergency payment assistance for rents and mortgage payments helped them avoid becoming homeless. These accomplishments were included in the overall public service accomplishments.

CDBG-CV expenditures are summarized in the CR-15.

CR-10 - Racial and Ethnic composition of families assisted

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

	CDBG
White	319
Black or African American	38
Asian	5
American Indian or American Native	6
Native Hawaiian or Other Pacific Islander	4
Total	372
Hispanic	237
Not Hispanic	158

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

Narrative

The table above does not include a category for people that identify as “other” or “multiple races” nor does it include racial/ethnic data for activities that had an area-wide benefit, therefore the above table does not necessarily match the number of people served by the CDBG program. Data was taken from the PR-23 Summary of Accomplishments and PR-03 CDBG Activity reports.

According to the most recent 2015-2019 ACS 5-Year Estimates, 81.6% of the population was White, followed by 4.4% for Blacks, 2.0% for Asians, and 0.9% for American Indian and Alaska Natives (AIAN). Persons who identified ethnically as Hispanic were 49.2% of the citywide population.

The table above shows 372 total persons reported, however the actual total was 395 persons. This was due to the reporting table in IDIS not having a category for “other multiracial” of which there were 23. Of the actual total of persons assisted with CDBG, 80.8% were White, 9.6% were Black or African American, 1.3% was Asian, 1.5% was AIAN and Native Hawaiian/Pac Islanders were less than 1%. For persons who identified as Hispanic, 60% of CDBG funding went towards assisting the ethnic group.

It should be noted that the Asian population was small, however except for the race group, the City significantly assisted minority groups with CDBG programs.

Needs Assessment

The Needs Assessment in the City’s Consolidated Plan assesses if any racial and ethnic group by income category has a disproportionate need in the area with regards to housing problems, severe housing problems, and cost burden. Households with housing problems are those that reside in units lacking complete kitchen and plumbing facilities as well as overcrowding (more than one person per room) and

cost burden (spending 30% or more of income on housing per month). Households with “severe housing problems” are those that reside in units lacking complete kitchen and plumbing facilities however they are in severely overcrowded homes (more than 1.5 people per room) and are severely cost-burdened (spending 50% or more of income on housing per month).

According to the Needs Assessment, for regular housing problems, Asian households experience a disparity across several income categories. AIAN households experience a disparity at 30-50% AMI. For severe housing problems, only Asian households experience a disparity at 0-30% AMI. For housing cost burden, only AIAN households experience a disproportionate level of cost burden in the City and experience this at the 30-50% cost burden level.

Overall, except for Asian and AIAN households, the City significantly assisted minority groups with CDBG programs. While these population groups were small, the City intends to assist all minority groups regardless of size.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	419,112	\$375,496

Table 3 - Resources Made Available

Narrative

The table above details the resources made available during PY 2020 as well as funds expended during the program year. CARES Act funds were also made available and summarized further below.

In PY 2020 the City had \$419,112 in resources available for its housing and community development projects from the FY CDBG allocation. The City expended \$375,496, which included prior year funds, with expenditures towards housing rehab activities, homeless prevention through the DVV program, public service activities, and program admin. Details of expenditures and a summary of activities are listed in the CR-05.

CARES Act Funds

In PY 2020, Commerce City was allocated CDBG-CV funds in two rounds for a total of \$467,040. CDBG-CV funds were intended to help fund activities that helped to assist LMI households prevent, prepare for and respond to COVID-19. The City expended \$329,142 in CDBG-CV funds on rent and mortgage utility assistance for households affected by the pandemic and program admin. The breakdown of CDBG-CV funds were:

CDBG-CV Administration: \$33,014 (10%)

CDBG-CV Rental & Mortgage Assistance: \$296,128 (90%)

Total CDBG-CV: \$329,142

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	20	68	Public Services and admin of the program are not targeted towards areas, but to eligible households citywide.
Core City	80	32	Housing Rehab Programs are targeted towards the Core City.

Table 4 – Identify the geographic distribution and location of investments

Narrative

Commerce City has identified the Core City (also known as the Historic City) as a target area. The target area is 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.

The Minor Home Repair programs are targeted towards the Core City with rehab activities and took place primarily within the target area. The DVV program, due to privacy protections for the victims cannot be tracked by location and is considered citywide. Public services for LMI households are not tracked by location, but are targeted citywide by eligibility.

The table includes CDBG-CV funds, which went towards rental, mortgage and utility assistance and admin of the CV program. These activities were targeted towards eligible households and not towards a specific target area. Due to the use of CDBG-CV funds towards eligible households and not by target area, the actual percentage of allocation weighted heavily towards Citywide.

Leveraging

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

CDBG funds are used to leverage state and local funds for nonprofits funded by the City. These organizations include Audio Information Networks, Brothers Redevelopment, Kids in Need of Dentistry and the Senior Hub.

Match Funds

The CDBG program does not require funding matches from other sources, however, the City encourages applicants to have other state or local funds in addition to CDBG funds for its programs.

The PY 2020 CDBG program was augmented by several City resources and community partners. All of the entities below gave either their staff time, knowledge, skill, facilities for meetings, and materials for distribution at events to help implement the City's CDBG program:

Organizations and agencies:

1. Adelante
2. Arapahoe County Weatherization's WAP Program
3. Brothers Redevelopment Inc. (MHRP and PAT)
4. Colorado Minority Business Organization
5. Commerce City Housing Authority
6. Commerce City Recreation Centers
7. Commerce City Senior Center
8. Community Resource Network
9. Cultivando
10. Groundwork Denver
11. Housing and Urban Development
12. Kids First Health Care
13. South Adams County Fire District
14. Urban Land Institute

City Departments:

1. City Attorney
2. City Council
3. City Manager - Communications

4. Community Development
5. Economic Development
6. Finance
7. Human Resources
8. Information Technology
9. Neighborhood Services
10. Parks, Recreation & Golf
11. Police Department
12. Public Works Department

Publicly Owned Land or Property Used to Address Needs and Goals in the Plan

No publicly owned land or property located within the jurisdiction was used to address the goals in the City. In the program year the City focused on residential rehab and direct services to residents.

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	40	37
Number of Special-Needs households to be provided affordable housing units	11	28
Total	51	65

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	30	28
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	21	37
Number of households supported through Acquisition of Existing Units	0	0
Total	51	65

Table 6 – Number of Households Supported

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

The City exceeded its overall goal to provide LMI households in Commerce City with housing assistance in its CDBG program.

The Paint-a-Thon program assisted 10 LMI households. BRI staff along with volunteers came together to caulk, prime and paint the homes of qualifying Commerce City residents. Some difficulties remain for COVID-19 through the loss of volunteers because of the pandemic and the increased time and expense of implementing the new lead-based paint regulations. The Minor Home Repair Program (MHRP) assisted 27 LMI households.

The Domestic Violence Victims Support Program provided rent, mortgage and utilities and other expenses for 1-2 months to help victims of domestic violence and their families avoid homeless situations. These activities helped a total of 28 LMI households consisting of 86 individuals.

The Arapahoe County Weatherization Program did not meet its annual goal. This is due to the continued delay in the Subrecipient Agreement’s execution and the health precautions for the homeowners and subrecipient worker because of the pandemic.

Discuss how these outcomes will impact future annual action plans.

Homeowner housing rehab continues to be a great need in Commerce City as evidenced by the number of applications and public input. Future Annual Action Plans should utilize CDBG funds to fund the Minor Home Repair Program as well as Paint-a-Thon and weatherization activities. Homeless prevention of LMI and special needs households is also a priority. The City should continue to fund the DVV program to assist households with victims of domestic violence with emergency assistance, especially since the 100% increase in DVV cases due to the pandemic restrictions.

Adding additional weatherization partners will help both the MHRP and weatherization needs increase their services to city LMI home-owners.

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

Number of Households Served	CDBG Actual
Extremely Low-income	12
Low-income	43
Moderate-income	10
Total	65

Table 7 – Number of Households Served

Narrative Information

The City assisted a total of 65 LMI households with affordable housing activities (41 with housing rehab/energy efficiency improvements and 46 with mortgage/rental/utility payment assistance).

For the 37 households reporting income through residential housing rehab programs (MHRP, PAT, and Arapahoe County Weatherization), 12 were extremely low-income, 6 were low-income and 10 were moderate-income. The MHRP program reported that among the 27 assisted through its activities 23 were elderly residents and 10 had a disability. All households assisted through the rehab programs were homeowners.

The 28 households served through the DVV program were assisted with mortgage, rent, temporary housing, and/or utility assistance. All the households assisted were low income. Finally, all households assisted in the DVV program were victims of domestic violence and their homeowner and renter status was suppressed for privacy and safety.

Worst case needs are extremely low-income households in need of housing assistance to avoid homelessness. In PY 2020 the City assisted 12 extremely low-income households, all in the housing rehab programs. Residential housing rehab activities help extremely low-income households to avoid housing conditions that may lead to homelessness. While not extremely low-income households, the DVV program assisted 28 households with victims of domestic violence with emergency assistance to avoid homelessness. Not included in the above table are the CDBG-CV rental and mortgage assistance programs for LMI households. These CV activities assisted a total of 246 LMI persons with subsistence payments and helped them avoid homelessness during the pandemic.

To address persons with a disability, the MHRP program assisted 10 households with a disability with minor home repairs, accessibility improvements, and energy efficiency.

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

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

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

While all City programs indirectly work to prevent homelessness among LMI and special needs groups in Commerce City, the City Police Department's Domestic Violence Victim Support Program (DVV) directly works to help individuals and families avoid becoming homeless. LMI households in the DVV program serve victims of domestic violence.

In PY 2020, the DVV program prevented homelessness for 28 households, totaling 86 persons. These residents had just reported domestic violence to the City Police Department and needed mortgage, rent, or emergency hotel stays; electrical; gas; and/or water payment assistance to keep a roof over their heads and/or escape their abuser.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City addresses emergency and transitional housing needs through the DVV program which may grant assistance to households experiencing domestic violence with emergency hotel stays to help keep them in a safe place and avoid being unsheltered.

The City has recently funded Access Housing, Inc. to increase staff and expand the services provided for their family homeless shelter and transitional housing apartment residents. The expansion of services was to increase life skill services and educational opportunities to the shelter's residents. Unfortunately, Access Housing declined their grant award after their director, entire staff, and most of their Board were replaced. Once they are better established and their new goals and missions are delineated, they plan to reapply.

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

Commerce City addresses this need directly through funding the City Police Department's DVV program. Residents that have just reported domestic violence to the PD are assisted to avoid becoming homeless with mortgage, rent, emergency hotel stays; or utility payment assistance to keep a roof over their heads and to keep them safe.

The City and the Commerce City Housing Authority (CCHA) regularly work with local partners to develop additional affordable housing units with many targeting extremely low-income households that are at risk of homelessness.

The City of Commerce City has a large network of housing and homeless service providers that offer services that help LMI households avoid homelessness. These service providers include nonprofit organizations, other Commerce City departments, other local public agencies and neighbor government Counties and Cities.

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

The CDBG Office will continue to meet and coordinate with organizations assisting the homeless to encourage and educate them on CDBG funding opportunities. These programs help homeless persons to make the transition to independent living.

For some homeless people, obtaining a job and making a wage is key to transitioning out of homelessness. The City previously funded renovations to the Small Business Resource Center (SBRC). SBRC assists residents seeking to start-up a business and those seeking jobs and job training. The SBRC is designed to help retain and increase jobs within the City.

The CDBG Office developed opportunities to support homelessness prevention efforts in conjunction with Adams County, Community Resource Network, and Adams 14 School District. The CDBG Office will continue to partner with local service agencies and governments to expand housing opportunities and services for homeless persons, including those making the transition to permanent housing.

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

Actions taken to address the needs of public housing

By definition, the City of Commerce City does not have any public housing units within its boundaries and therefore will not take any actions to address the needs of public housing specifically.

However, the City will refer to the Commerce City Housing Authority (CCHA) for the public housing needs of city residents. The CCHA provides housing opportunities and resources to help LMI residents buy, rent or improve their existing housing. It's mission is to improve the housing stock and provide safe, quality and attainable housing for all Commerce City residents. The CCHA has an ownership interest in over 220 affordable housing units throughout Commerce City and administers approximately 110 Housing Choice Vouchers (HCV) with over 250 people on the Section 8 voucher waitlist. HCV participants use a voucher to help pay for rent costs from private landlords. These units are inspected annually to ensure they meet housing quality standards set by HUD. Eligible senior residents in need of affordable housing are also served by the CCHA with several affordable housing options in the City.

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

The Commerce City Housing Authority (CCHA) offers a *Down Payment and Closing Cost Assistance* loan program for income-qualified, first-time homebuyers, for homes purchased in Commerce City.

The CCHA helps qualifying first-time home buyers with down payment and closing cost assistance if they successfully complete a Colorado Housing Finance Authority-approved home buyer workshop. Financial assistance comes in the form of a second mortgage loan for down payment and all allowable closing costs up to \$10,000 at 3.5% interest rate with up to a 10 year repayment schedule. Eligibility requirements apply.

Eligible households were also referred to the Metro Mortgage Plus program. This program, which is administered by Commerce City and Denver County provides a competitive, 30-year fixed-rate mortgage down payment assistance grant equal to 4 percent of the mortgage amount to qualifying LMI home buyer families. Eligibility requirements also apply.

Additionally, the CCHA and CDBG offices communicated daily with residents in need of affordable housing. Residents are provided with education and information on housing finance, maintenance, accessibility, and repairs.

Actions taken to provide assistance to troubled PHAs

The CCHA is not covered by a PHA Plan and is not subject to a HUD review or designation of this type. There are no troubled PHAs in Commerce City.

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

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

The City's Neighborhood Services (NS) leadership and staff have recently taken an active role in helping residents live safer and healthier. NS has collaborated with the CDBG Office in the past and disseminated information on the Minor Home Repair Program (MHRP) and other available service programs for city residents. Increased communication between NS and the residents is improving and the program's goal is to see the code enforcement violations reduced.

The City completed their Housing Need Assessment and Housing Plan in 2018/9. This 2-year project revealed steps the City could pursue to alleviate affordable housing barriers. The City continues to support mixed-use housing and has been working with developers on three separate sites to provide affordable housing.

And as previously described in detail, the City continues to support the MHRP program to finance the correction of building code violations and the rehabilitation's related permit and fee costs. LMI households have difficulty affording repairs to existing housing that may lead to conditions that are unsafe and suitable for habitation.

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

The lack of adequate funds is an obstacle in meeting underserved needs in Commerce City. One of the strategies taken to address this is working together and funding agencies in the area that have greater expertise, more funding and reach for LMI persons with these needs.

Through working with the Police Department Victim Services Department, the City is able to provide for temporary, limited housing support payments to escape abuse and avoid homelessness. Payments are made directly to the billing entity (utilities, landlord or mortgage company, hotel, etc.).

To further meet the housing needs of LMI City residents, the CDBG Office continued to collaborate with the Commerce City Housing Authority (CCHA). The CDBG Office and CCHA worked together to coordinate each other's grant and loan programs for LMI homeowners. As needed, the HRP applicants are directed to the CCHA.

In recent years, the City completed two housing studies: *The City of Commerce City Housing Needs Assessment* and the *Commerce City Balanced Housing Plan & CCHA Affordable Housing Implementation Plan*. The first provides current C3 data, current housing overviews, identifies barriers to affordable housing plus housing gaps and deficiencies. The second provides current C3 data, current housing

overviews, identifies barriers to affordable housing plus housing gaps and deficiencies.

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

Each Housing Repair Program (HRP) applicant receives a *Protect Your Family from Lead in Your Home* booklet. This booklet is also available on the CDBG page of the City's website. In accordance with 24 CFR 570.608 regulations, each of the PY 2020 rehabilitated homes complied with lead-based paint regulations.

As part of rehab activities in relation to painting work, the Paint-a-Thon program has procedures to detect lead on home exteriors. When this occurred, a qualified third-party consulting firm was brought in to follow the LBP regulations to remove hazards.

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

All the activities in the CDBG program work to directly reduce the number of poverty-level families in Commerce City. MHRP assistance helps LMI households to maintain or improve housing conditions to help them avoid the possibility of homelessness. As well rehab of homes helps to protect and maintain the value of housing.

The City and its partners assisted LMI persons with vital public services that helped to improve their quality of life. Services included youth employment training, services for persons with a vision difficulty through the Audio Information Network, and providing recreational activity scholarships.

As mention earlier, the City funded the City Police Department's DVV also helped households with victims of domestic violence. This assistance kept the individuals and families in safe housing and helped them to avoid homelessness.

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

The CDBG Team was established to review and rank all CDBG applications; and make recommendations for funding to the City Council. The CDBG Team is comprised of the following Commerce City Departments and Divisions: the City Attorney, City Manager, City Planning, Communications, Community Development, Economic Development, Finance, Information Technology, Neighborhood Services, Parks and Recreation, the Police Department, Public Works and the Commerce City Housing Authority (CCHA).

The CDBG Team provides comprehensive inter-departmental input into each year's funding award process and the formation of the Annual Action Plan. The team works to avoid internal institutional gaps while providing citywide interdepartmental cooperation and guidance. This compilation of talent, community knowledge, and professional expertise streamlines the flow of information from the City departments into the CDBG Program. Attendance in training, seminars, meetings, group e-mails, and other personal interactions was accomplished with each departments mentioned above and applicants

and nonprofit service providers.

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

The CDBG Office co-facilitates the Community Resource Network (CRN) - a service provider networking group servicing the Denver Metro Area. The CRN is comprised of hundreds of area non-profits, governmental agencies, faith-based, financial, business, and volunteer organizations working in Commerce City and Metro Denver areas.

During PY 2020 the City continued to be limited in its ability to participate in regional and local outreach events due to the COVID-19 pandemic, however the CDBG Office was able to: continue offering technical assistance to agencies on available funding sources, associated timelines, applicable requirements, and the most impactful uses of funds; continue participating in regional efforts and meetings with public and private housing; continue providing pre-application and referral information for property owners in regards to the housing rehab programs, and continue participating in training opportunities provided by HUD and NCDA.

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

Commerce City is included within the recently developed Adams County 2020 Analysis of Impediments to Fair Housing Choice (AI), which consists of a comprehensive review of laws, regulations, policies, and practices affecting housing affordability, accessibility, availability, and choice within the county and for member municipalities. Through this analysis, the County and member municipalities identified six impediments to fair and affordable housing within the region. They were:

- Shortage of affordable, accessible housing units.
- Discrimination in rental transactions.
- Barriers to homeownership.
- Lack of resources to address poor housing conditions.
- Disparate access to opportunity.
- Limited zoning code and land use regulations.

Actions to Address Impediments to Affordable and Fair Housing Choice

With limited federal HUD CDBG funds, the City directed efforts towards the impediments identified that dealt directly with affordability and accessibility as well as addressing poor housing conditions.

In PY 2020 the City assisted 37 LMI owner-occupied households with housing rehab activities through the Minor Home Repair Program (MHRP) and Paint-a-Thon rehab program. There were 23 LMI seniors and 10 disabled owner-occupied households assisted through these programs.

The City also worked to assist LMI residents in the city with disparate access to opportunity. In recent program years, the City assisted the Small Business Resource Center (SBRC) which works to help LMI residents seeking to start-up a business and also those seeking jobs and job training. There were a total of 138 small businesses assisted in the previous program year. Eleven (11) individuals were assisted with technical assistance to start-up their businesses and 132 existing businesses were assisted with COVID-19 relief options and funding opportunities.

CR-40 - Monitoring 91.220 and 91.230

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

The general oversight of the City's CDBG Program is performed by the Director of the Community Development Department (CD). The day-to-day monitoring activities are performed by the CDBG Coordinator. The financial oversight is performed by the City's Finance Department (FD). Previous difficulties in accurately tracking project expenses were remedied with the construction and adoption of a *Master Financial Tracking Spreadsheet*. Additional improvements are being sought in coordination with FD, DVV, and the Economic Development Department, to track administrative spending and accurately request drawdowns in IDIS.

As the City continues implementing its identified CDBG projects, the CDBG Office will help ensure compliance by:

1. Continuing professional training for the CDBG Coordinator, CCHA Manager, and the FD representative.
2. Continuing to cross-train City staff on CDBG administrative responsibilities.
3. Exploring the possibility of procuring additional CDBG staff time
4. Expanding technical training and personal attention given to Subrecipients.
5. Providing desktop monitoring visits for Subrecipients with each reimbursement request and/or quarterly report submitted. This includes all cross-cutting regulations such as labor, relocation, environmental, and fair housing, and equal opportunity.
6. When the pandemic allows, to perform informal on-site visits to review files and procedures, listen to the Subrecipient's ideas and concerns, and amend/accommodate the project as needed.
7. When the pandemic allows, to performing formal on-site monitoring visits with each Subrecipient.
8. Providing follow-up, as needed, to all Subrecipients in either written or verbal format, as appropriate and required.
9. Utilizing HUD provided checklists and reporting documents and encourage the same from all of the Subrecipients.
10. Continuing to work with the City's Legal Department on the procurement and hiring of consultants and contractors.
11. Entering information regularly into the Integrated Information Disbursement System (IDIS).
12. Improve the Subrecipient's reporting forms.
13. Continue to increase the frequency of drawdowns early in the project year to easily comply with HUD's annual Timeliness Test.
14. Meeting with organizations planning to apply for funding, to encourage a wise approach to the project and reduce application, administrative and cross-cutting requirements.

The City will continue to work with local businesses to contract with for business, in particular woman-owned and minority-owned businesses. Further, the City will follow all Section 3 requirements.

The comprehensive planning requirements include the development and process of the 5-Year ConPlan, the AAP, and CAPER. Citizen participation is a vital part of the consolidated plan process and the City will make sure to follow its HUD approved Citizen Participation Plan (CPP) which helps guide the City to gather information which is an essential component in identifying the priority housing and community development needs in C3. These priority needs form the basis of the City's Strategic Plan in the ConPlan and annual goals and activities carried out in each subsequent AAP.

The ConPlan is developed every 5 years, with identified priority needs and goals to address these needs. Each year of the 5-Year plan, the City develops an AAP which identifies the projects and activities that will address and further the goals of the plan. This plan is required to be submitted to and approved by HUD each year to receive CDBG funding annually. At the end of each AAP program year, the City will report on the accomplishments and performance of the program through the CAPER. Citizen participation is required in the development of each of these stages as per 24 CFR 91.105.

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

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

The City adheres to its HUD approved Citizen Participation Plan, which outlines the draft CAPER and related performance reports shall be posted for public comment for not less than 15 days before the Public Hearing of the draft CAPER. The following are ways citizens can participate:

Public Comment Period: A draft of the PY 2020 CAPER will be available to review from December 5, 2021 to December 20, 2021, and can be downloaded from the City's website at <http://www.c3gov.com/cdbg>

Public comment regarding the draft CAPER can be submitted in the following ways:

By Mail or Delivery: Commerce City Civic Center, 7887 E. 60th Avenue, Commerce City, CO 80022

Via E-Mail: glewis@c3gov.com

Public Hearing: A public hearing will be held at a regularly schedule City Council meeting on December 20, 2021 at 6:00 PM. City Council meetings are held at the Civic Center at 7887 E 60th Ave., Commerce City, CO 80022. Meetings are also broadcast online and on local Channel 8. Visit c3gov.com/council for how to access the public hearing and instructions on how to comment at virtual meetings.

Accessibility: Live Spanish interpretation is available at city council meetings by calling 720-386-9023 and entering the conference code 104091*. To request accommodations, concerning rights under the Americans with Disabilities Act, to attend or participate in any public meeting, and/or to obtain this notice in alternate formats, contact the City Clerk at 303-227-8791 as soon as possible before the meeting.

Please see the attached affidavit of publication for the CR-00 as well as the resolution authorizing the submission of the CAPER.

CR-45 - CDBG 91.520(c)

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

The PY 2020 CAPER is the fifth and final reporting year for the City’s 2016-2020 Consolidated Plan and there were no changes to the original Strategic Plan priorities or goals in the program year. The City does not anticipate any changes in the original program objectives that would result in changes to its current programs. The City will update its upcoming Consolidated Plan through the success and failure of current projects as well as any identified priority needs or goals through the citizen participation process.

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

No