



City of Commerce City,
Colorado

Community Development Block Grant

2022 Annual Action Plan

City of Commerce City
Community Development Department
Commerce City Civic Center
7887 E. 60th Avenue
Commerce City, CO 80022

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Executive Summary

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

1. Introduction

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. All jurisdictions receiving CDBG funds must adopt an Annual Action Plan as required by HUD. This plan represents the PY 2022 Annual Action Plan (AAP), which is the second year of the 2021-2025 Consolidated Plan. CDBG funded activities developed for the AAP adhere to at least one of the three national objectives established by HUD:

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

The AAP 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 2022 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.

2. Summarize the objectives and outcomes identified in the Plan

Commerce City and all the City's community development partners have continually worked to improve the quality of life for residents in the City, especially for low- to moderate-income residents.

With the help of federal CDBG funds significant contributions have been made to maintain safe and affordable housing, improvements to public facilities and infrastructure, and public services to improve the quality of life for low- and moderate-income households. As is the case in many low- to moderate-income households, affordable housing and homeless prevention remain some of the greatest needs in the City as documented by the current Consolidated Plan and the most recent PY 2020 Consolidated Annual Performance and Evaluation Report (CAPER). The following is a highlight of the accomplishments from the PY 2020 CAPER.

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 Brothers Redevelopment.

Public Services and Homeless Prevention: The City and its partners assisted 560 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 68 households consisting of 237 victims of domestic violence avoid homelessness.

Finally, with CDBG-CV the City along 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.

3. Evaluation of past performance

The City of Commerce City, with other public/private agencies, nonprofit community housing providers and other local government entities have made significant contributions to provide safe, decent and affordable housing, a suitable living environment and economic opportunities especially for low- to moderate-income individuals in the community. However, essential public services and affordable housing development and preservation remain some of the most prolific needs facing Commerce City and its residents, as documented by the City's Consolidated Plan and the PY 2020 Consolidated Annual Performance and Evaluation Report (CAPER).

According to the most recent PY 2020 CAPER, the City made significant progress in its housing and community development goals. These accomplishments are listed 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 560 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 68 households consisting of 237 victims of domestic violence avoid homelessness.

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. With 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 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.

4. Summary of Citizen Participation Process and consultation process

The City closely followed its Citizen Participation Plan in soliciting citizen input for the PY 2022 AAP. Public hearings were held so City residents could offer input into how proposed projects and activities fit with the City's housing and community development needs. A public comment period was held to give citizens an opportunity to review and submit written comments on the AAP.

The AP-12 Citizen Participation section details the citizen participation outreach efforts of the City of Meriden.

5. Summary of public comments

All comments were considered by the City. To see a summary of comments made by the public see the AP-12 Citizen Participation and the attachments in the AD-26.

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

All comments were accepted.

7. Summary

The 2022 AAP is the second year of the 5-Year 2021-2025 Consolidated Plan.

During the development of the Consolidated Plan, the following priority needs were identified:

- Housing and Homelessness
- Public Services
- Economic Development
- Neighborhood Stabilization
- Public Infrastructure
- Emergency Response
- Administration and Planning

Entitlement grant resources totaling approximately \$422,541 are expected during the 2022 fiscal year (October 1, 2022 – September 30, 2023) through the CDBG program and will be used by the city to address priority needs.

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	COMMERCE	Community Development Department

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information

George Lewis, CDBG Coordinator
City of Commerce City Community Development Department
7887 East 60th Avenue
Commerce City, Colorado 80022
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Webpage: <https://www.c3gov.com/CDBG>

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

1. Introduction

This AAP is based on extensive consultation with members of the public, community stakeholder organizations, other City departments, and CDBG staff throughout the City of Commerce City. Consultation is a vital component of the planning process. It's through these discussions, that the City can identify the unmet community needs, in particular the needs of low- to moderate-income households and special needs groups. Consultation gathered from the Consolidated Plan's citizen participation process helped to form the basis of the Strategic Plan which identified the priority housing and community development needs and the goals of the City, including the goals in this PY 2022 AAP.

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

In conducting its community engagement process, the City strove to engage with housing providers and health, mental health, and other service organizations and agencies. Stakeholders were invited to attend public input sessions, participate in individual interviews or focus groups, and/or provide input on housing and community needs through the project website. Housing, health, mental health, and other service providers that participated in the planning process include Access Housing, Almost Home, Colorado Access, Colorado Consumer Health Initiative, Colorado Orthodontic Foundation, Kids First Health Care, Kids in Need of Dentistry (KIND), Let Your Light Shine, Mercy Housing, St. Vincent de Paul-Commerce City Chapter, Tri-County Health, Denver Regional Council of Governments, Adams County Community and Economic Development, Commerce City Housing Authority, Maiker Housing, Catholic Charities, Salvation Army, Habitat for Humanity, Brothers Redevelopment, Rebuilding Together Metro Denver, Metro Denver Homeless Initiative, PASCO (Personal Assistance Services of Colorado, A Precious Child, Salud Family Health Centers, and State of Colorado Office of Homeless Initiatives. The City works with the Commerce City Services Alignment organization to assist in their efforts to coordinate family health care services and establish the Commerce City Community Campus which will serve as a hub for neighborhood wellness in the core city.

As the City implements its CDBG program, it will continue to work closely with public and private sector partners to promote interagency communication and planning and to coordinate health, mental health, and other service delivery to low- and moderate-income residents. As the City makes its annual CDBG project selections, it will consider how proposed activities connect public and assisted housing residents with health, mental health, and other services.

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

The City of Commerce City participates in the Metropolitan Denver Continuum of Care led by the Metro Denver Homeless Initiative. The Metro Denver Homeless Initiative is a regional system that coordinates services and housing for people experiencing homelessness, including street outreach, emergency shelter, transitional housing, rapid rehousing, prevention and diversion, and permanent supportive housing. Although the City of Commerce City does not receive Emergency Solutions Grant (ESG) funds, the City will consider projects that address homeless needs for CDBG funding. Additionally, the City may provide support to or collaboration with local homeless housing and service providers through grants it makes to organizations that participate in the Metro Denver Homeless Initiative.

The CDBG office also consults with the Commerce City Housing Authority, Access Housing, Almost Home, and Star Girlz – local homeless services and housing providers – to assess the current needs of homeless persons and persons at risk of homelessness in Commerce City. Funding applications to the CDBG program are encouraged.

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 participates in the Metro Denver Continuum of Care led by the Metro Denver Homeless Initiative. As such, the City has an opportunity to provide input regarding the use of CoC ESG funds, performance standards and outcome evaluation, and HMIS administration.

Commerce City does not receive an ESG entitlement grant. However, the City identified homeless housing and services as a potential priority during its 2021-2025 Consolidated Planning cycle and will consider projects that address homeless needs for CDBG funding.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	ACCESS HOUSING
	Agency/Group/Organization Type	Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has a partnership with the organization and is engaged in ongoing communication and coordination.
2	Agency/Group/Organization	Adams County Community and Economic Development
	Agency/Group/Organization Type	Housing Economic Development
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The County coordinates with the City and is engaged in ongoing communication and coordination of the AAP and other housing and community development programs.
3	Agency/Group/Organization	AMERICAN LEGION
	Agency/Group/Organization Type	Services-Veterans Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homelessness Needs - Veterans

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The organization has a partnership with the City and is engaged in ongoing communication and coordination. It has attended focus groups and was interviewed.
4	Agency/Group/Organization	BROTHERS REDEVELOPMENT INC
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has a partnership with the organization and is engaged in ongoing communication and coordination. Brothers administers the housing rehab programs in the City.
5	Agency/Group/Organization	Commerce City Housing Authority Housing Board
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has a partnership with the organization and is engaged in ongoing communication and coordination.
6	Agency/Group/Organization	Commerce City Police Department
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has a partnership with the organization and is engaged in ongoing communication and coordination.
7	Agency/Group/Organization	Metro Denver Homeless Initiative
	Agency/Group/Organization Type	Services-homeless

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has a partnership with the organization and is engaged in ongoing communication and coordination.
8	Agency/Group/Organization	PCs for People
	Agency/Group/Organization Type	Broadband
	What section of the Plan was addressed by Consultation?	Non-housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has a partnership with the organization and is engaged in ongoing communication and coordination.
9	Agency/Group/Organization	A Precious Child
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has a partnership with the organization and is engaged in ongoing communication and coordination.
10	Agency/Group/Organization	Commerce City Community Development Snow Angels
	Agency/Group/Organization Type	Services-Children

What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has a partnership with the department and is engaged in ongoing communication and coordination.

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

There were no agency types not intentionally consulted. All comments were welcome and accepted.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Metro Denver Homeless Initiative	MDHI's CoC application identifies policies and practices related to homelessness and organizations that provide homeless services and housing. This report informed the Market Analysis and the Strategic Plan homelessness strategy.
City of Commerce City C3 Vision Comprehensive Plan	City of Commerce City	Goals of the Comprehensive Plan that overlap with the goals of the Strategic Plan include: Reinvest in and rehabilitate aging housing stock, Increase housing types to meet current and future needs, Increase the range of housing prices, Ensure neighborhood accessibility to all modes of travel, Strengthen existing neighborhoods through reinvestment and assistance with renewal efforts, Promote regular physical activity by providing safe, convenient opportunities for recreation and human-powered travel, Improve access to health care facilities, programs, and human services, encourage increased access to healthy foods for all residents, Build and maintain parks to enhance neighborhoods and meet current and future generation needs, Increase year-round active recreation opportunities and Increase educational options for life-long learning

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Economic Development Strategic Plan (2010)	City of Commerce City	Goals of the Economic Development Strategic Plan that overlap with goals of the strategic plan include: Conduct in-depth research to determine occupations and skill sets most in demand by the targeted industries; Ensure that employer feedback about workforce strengths and weaknesses is periodically gathered through City-employer programs and communicated to area workforce development providers; Elevate high school graduation rates and technical training among area residents; and Increase local employer understanding and utilization of workforce development programs.
Walk.Bike.Fit Commerce City (2012)	City of Commerce City	Goals of the Walk.Bike.Fit plan that overlap with goals of the Strategic Plan include: As recommended in the current Parks and Recreation Master Plans and other documents, create a system of outdoor civic spaces that are destinations for active travel.
City of Commerce City Housing Needs Assessment	City of Commerce City	The Housing Needs Assessment notes several housing issues in Commerce City, including a housing affordability gap, lack of diversity in the city's housing stock, and a growing homeless population.
Commerce City Balanced Housing Plan	City of Commerce City and Commerce City Housing Authority	Goals of the Balanced Housing Plan and Commerce City Housing Authority Affordable Housing Implementation Plan that overlap with goals of the Strategic Plan include: Explore policies for creative housing solutions, Explore options to fund housing development, and develop special needs housing units.
Commerce City Station Area Master Plan	RTD Denver	Goal of building multi-use facilities and affordable housing near the new N Line Rapid Transit Districts station at 72nd and Colorado Blvd. Goal of improved connectivity through the City to the new N Line Rapid Transit District's new station at 72nd and Colorado Blvd.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2020 Analysis of Impediments to Fair Housing	Adams County	Goals of the 2020 Analysis of Impediments to Fair Housing Choice in Adams County that overlap with goals of the Strategic Plan include: Collaborate regionally to develop resources and training for financial literacy, focused specifically on disproportionate impacts and housing challenges identified in this AI; Investigate funding sources to provide grants for home improvement, specifically to groups with high rates of denials for home improvement loans; Continue participation in the Metro Down payment Assistance program and consider affirmatively marketing to protected classes that are underrepresented in homeownership; Expand resources for the development of affordable housing in the county; Inventory public land and other resources that may contribute to attracting or constructing affordable housing in the county; Carry forward response and recovery efforts related to the impacts of the COVID-19 pandemic; and Expand internet access in the county, specifically for low-income households. Access to opportunity including employment, quality education, and health care depend heavily on strong internet access throughout the COVID-19 pandemic.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

In implementing its AAP, the City of Commerce City will work with the Adams County Community and Economic Development, Commerce City Housing Authority, Maiker Housing, Arapahoe County Weatherization Division, City of Westminster, City of Thornton, and Adams County school districts 14 and 27J. The City will continue coordinating with regional organizations serving the Denver region and relevant state agencies, including the Metro Denver Homeless Initiative, the State of Colorado Office of Homeless Initiatives, and the Adams County Workforce and Business Center.

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

Commerce City has a Citizen Participation Plan that it follows closely in soliciting citizen input for the PY 2022 Annual Action Plan. A series of public hearings were held so members of the public could offer input into how proposed projects and activities fit with the City's housing and community development needs identified in the Consolidated Plan. A public comment period was held to give citizens an opportunity to review and submit written comments on the Annual Action Plan. Members of the public were encouraged to share their views and ideas on the AAP and upcoming planning year.

The following table details the citizen participation outreach efforts of the City of Commerce City.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
1	Public Hearing	Non-targeted/broad community	A public hearing was held on August 1, 2022 at 6:00 PM to discuss the 2022 AAP.	All comments accepted.	All comments were accepted.	
3	30 Day Public Comment Period	Non-targeted/broad community	A 30-day public comment review period was held from July 14, 2022 to August 13, 2022 to allow the public an opportunity to review and make comments on the draft 2022 Annual Action Plan. The plan was available on the City website and at the Community Development Department office. Written comments could be sent to Community Development Department, Commerce City Civic Center, 7887 E. 60th Avenue, Commerce City, CO 80022 or emailed to glewis@c3gov.com	All comments are attached to the AD-25.	All comments were accepted.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

Entitlement grant resources for PY 2022 are estimated at \$422,541. The PY 2022 grant will principally benefit LMI residents by providing safe, accessible, and energy-efficient housing, assist residents with disabilities, prevent homelessness, reduce crime, provide suitable and affordable living environments, and assist the City’s elderly and disabled.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	422,541	0	0	422,541	1,267,623	This PY 2022 AAP is the second year of the 5-year ConPlan. The expected amount available for the remainder of the ConPlan is 3x more years of the annual allocation.

Table 5 - Expected Resources – Priority Table

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

The CDBG program does not have a matching requirement, however Commerce City encourages City departments and subrecipients to leverage other resources to further the reach of the CDBG funds and increase the support available to organizations and individuals benefitting from the City's CDBG investments. Through the application process, subrecipients are asked to identify these sources of funds. The City will work with various organizations and City departments to use CDBG funds to leverage other state and local funds to further the activities identified in this plan.

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

The City does not anticipate using publicly owned land or property to address the needs identified in this plan except in the area of public facilities. Future land purchase and easements are anticipated for drainage and transportation improvements. When these improvements are scheduled to occur, CDBG funding may be used to assist in the development or installation of those public infrastructure improvements.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Services & Resources for LMI Residents	2021	2025	Homeless Non-Homeless Special Needs Non-Housing Community Development	Citywide	Public Services	CDBG: \$63,381	Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
2	Provide, Preserve, and Support Affordable Housing	2021	2025	Affordable Housing	Citywide	Housing and Homelessness	CDBG: \$190,143	Homeowner Housing Rehabilitated: 20 Household Housing Unit
3	Improve Public Infrastructure	2021	2025	Non-Housing Community Development	Citywide	Public Infrastructure	CDBG: \$84,508	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
4	Planning and Administration	2021	2025	Non-Housing Community Development	Citywide	Affirmatively Further Fair Housing Choice Program Administration and Planning	CDBG: \$84,508	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Provide Services & Resources for LMI Residents
	Goal Description	Provide public services to stabilize low- and moderate-income individuals and households and/or those with non-homeless special needs and increase their access to opportunity.
2	Goal Name	Provide, Preserve, and Support Affordable Housing
	Goal Description	Provide for the preservation and repair of existing affordable housing, support for low- and moderate-income residents facing unaffordable rent and mortgage costs, and development of diverse affordable housing types.
12	Goal Name	Improve Public Infrastructure
	Goal Description	Improve access to public facilities and infrastructure to benefit low- and moderate-income households and communities.
	Goal Name	Planning and Administration
	Goal Description	Administration and planning functions associated with the CDBG program. Fair Housing outreach and training.

Projects

AP-35 Projects – 91.220(d)

Introduction

The PY 2022 AAP projects are identified below.

Projects

#	Project Name
1	CDBG: Administration
2	CDBG: Housing Programs
3	CDBG: Public Services
4	CDBG: Public Facilities

Table 7 - Project Information

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

All activities listed will help address a priority need in the 2021-2024 Consolidated Plan.

In analysis of the public input received across interviews, focus groups, community meetings, online tools, and all other methods, housing and homelessness-related needs were cited more than almost any other type of need. Based on this information, the City’s internal team of CDBG advisors rated housing and homelessness a high priority need. Most of the funding in PY 2022 will go towards affordable housing preservation.

Also, during the public input process, 15 of the top 18 needs were related to public services. Additionally, the demand for public services funding among local agencies and organizations so far exceeds the amount of available funding that the City’s internal team of CDBG advisors rated public services a high priority need. However, for CDBG there is a 15% grant cap that can be used to fund public services.

Citizens in the public input process named public infrastructure improvements they would like to see in their communities in the areas of transportation, pedestrian improvements, park improvements, broadband access and streetscaping. The size of the allocation available to Commerce City relative to the cost of large-scale infrastructure projects minimizes the ability for significant CDBG impact in the area of public infrastructure.

AP-38 Project Summary

Project Summary Information

1	Project Name	Administration and Planning
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Administration & Planning
	Funding	CDBG: \$84,508
	Description	Administration and Planning of CDBG funds for PY 2022.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	7887 E. 60th Ave, Commerce City, CO 80022
	Planned Activities	General program administration and planning (21A).
2	Project Name	CDBG: Housing Programs
	Target Area	Citywide
	Goals Supported	Provide, Preserve, and Support Affordable Housing
	Needs Addressed	Housing and Homelessness
	Funding	CDBG: \$190,143
	Description	Funds will be used to rehabilitate homes for health, safety, accessibility, and energy efficiency. Additional activities include exterior residential painting and accessibility improvements for seniors and disabled residents.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated: 20 Household Housing Unit
	Location Description	Citywide, eligible.
	Planned Activities	Planned activities include the Minor Home Repair Program and other housing rehab programs (14A).

3	Project Name	CDBG: Public Services
	Target Area	Citywide
	Goals Supported	Provide Services & Resources for LMI Residents
	Needs Addressed	Public Services
	Funding	CDBG: \$63,381
	Description	Public services that will target and benefit low- to moderate-income households and special needs groups.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
	Location Description	Citywide, eligible.
	Planned Activities	Planned activities include services for the elderly (05A), persons with a disability (05B) and victims of domestic violence (05G).
4	Project Name	CDBG: Public Facilities
	Target Area	Citywide
	Goals Supported	Improve Public Infrastructure
	Needs Addressed	Improve Public Infrastructure
	Funding	CDBG: \$84,508
	Description	The City will fund public facility and infrastructure improvements that will benefit residents in low/mod areas.
	Target Date	9/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
	Location Description	Citywide, eligible.
	Planned Activities	Planned activities include public facility (03F, 03E) and infrastructure improvements (03K, 03L).

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 the 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 active railroad lines, the new N Line commuter train, a river, and a large creek. As these features cut through and around the City they create separated pocket neighborhoods. The historic City area contains most of these older pocket neighborhoods, and comprises the highest percentages of LMI individuals, minorities, older homes, and infrastructure in need of rehab.

The City, however does not allocate funding based solely on geographic requirements. Individuals or households must meet income qualifications in order to receive direct assistance from activities such as housing rehab and public services in the CDBG program. Eligible activities to public facilities & infrastructure improvements will be targeting low- to moderate-income identified census tract areas in need, which have been identified as the historic part of the City, also known as the Core City, and by the tracts listed below in this section. See below on how the City will determine these areas.

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The Core City lies south of 96th Avenue, East of Hwy 2 and Quebec Street, then south and west to the City boundaries, containing census tracts 87.05, 87.06, 87.09, 88.01, 99.02 and 89.01. This Core City may alternately be referred to as the Historic City. If public facilities and infrastructure improvements are identified, these activities must be located in a low/mod tract such as the tracts identified above.

Direct services will be targeted to LMI and special needs groups citywide by eligibility and need. Based on the income of the residents and the age of the homes most the CDBG-funded housing rehabilitation work will take place in the Core City. The public services being funded will be dispersed as needed throughout the City to benefit LMI and special population residents.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

To meet the affordable housing preservation needs for our residents, the 2022 AAP will continue to fund the HRPs to assist another 20 households with rehab activities. CDBG will fund the Minor Home Repair Program (10) and the Paint-a-Thon Program (10), which will assist owner occupied homes remain affordable to their LMI occupants.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	20
Special-Needs	0
Total	20

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	20
Acquisition of Existing Units	0
Total	0

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

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

The Brothers Redevelopment, Inc., Paint-a-Thon Program (PAT) will paint the exterior of 10 homes, improve accessibility, and provide yard clean-up for the disabled and/or seniors homeowners. This subrecipient will advertise, promote, qualify, equip, and organize the volunteers for each home activity. The CDBG funds will be used to purchase the paint, supplies and PPE supplies to perform the above activities.

AP-60 Public Housing – 91.220(h)

Introduction

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

The CCHA does not own any Public Housing as defined by the federal government. The CCHA does have ownership interest/partnerships in 229 affordable housing units throughout Commerce City and administers approximately 110 Housing Choice Vouchers.

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

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

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

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

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

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

homeownership skills and refer to other resources.

- Meet with, and reach out to, residents and resident leaders to better understand and respond to needs and goals.
- Support programs encouraging residents to become active and involved within their community, including awareness and involvement in their neighborhoods, their surroundings, and crime prevention.

Maiker Housing Partners has a Family Self-Sufficiency (FSS) Program that is offered to HCV participants. FSS is an employment based program that assists families with identifying their strengths while providing support and resources to accomplish their goals, which may include homeownership. The program has the unique benefit of providing a savings account where families deposit funds towards their goals.

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. Maiker Housing Partners (formerly Adams County Housing Authority) is designated a “Small PHA” and is not designated as PHAS or SEMAP troubled, or at risk of being designated as troubled.

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

Introduction

Commerce City is a member of the Metro Denver Homeless Initiative, a multi-agency collaboration focused on ending homelessness in the seven-county Denver metropolitan area. The initiative, which serves as the Continuum of Care for the Denver metropolitan area, brings together public and private organizations to provide homelessness prevention services, housing placement assistance, transitional housing, and permanent supportive housing for persons who are experiencing or at risk of homelessness.

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

Expanding the availability of homeless services and affordable housing is one of the City's priorities for the Plan. Activities funded under this priority may also include outreach to unsheltered homeless persons. Commerce City also participates in the Metro Denver Continuum of Care's Point-in-Time count, which includes outreach to people experiencing homelessness and evaluation of needs.

Projects to support homeless outreach in PY 2022 include:

- Establishing community resource navigation and/or a reproducible resource guide; and
- Providing homeless outreach supplies, including basic supplies and services for the City's homeless navigator to meet and assist people experiencing homelessness. The homeless navigator collaborates with city departments and external organizations to coordinate homeless navigation efforts to individuals and families in need of services and support within the City.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City will support and help to expand the availability of homeless services and housing through providers such as Access Housing, Almost Home, and other providers. These homeless service providers will continue to provide emergency and transitional for people experiencing homelessness.

Projects to address emergency shelter and transitional housing needs in PY 2022 include:

- Providing wrap-around family support services through a partnership with A Precious Child, and
- Partnering with American Legion for services for veterans.

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

Commerce City and the Metro Denver Homeless Initiative support a Housing First model that prioritizes low-barrier permanent housing and offers case management and other supportive services. Almost Home provides case management and re-housing assistance to assist individuals and families in making the transition to permanent housing, and Maiker Housing Partners offers housing vouchers and affordable housing opportunities.

The City will continue to support the Continuum of Care and homeless service providers that recognize the need to shift focus and resources to long-term, permanent housing in order to end homelessness. Commerce City may fund services to assist people experiencing homelessness make the transition to permanent housing under the priority of expanding the availability of homeless services and housing.

To assist individuals and families in making the transition to permanent housing, the City expects to enter the Adams County HOME Consortium, with the goal of providing additional affordable housing.

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.

Housing and service providers in Commerce City work together to prevent homelessness in populations who are vulnerable to or at risk of homelessness, including extremely low-income individuals and families, people discharged from institutions, and those receiving assistance from agencies addressing a variety of needs, such as housing, health, social services, education, or youth needs. In Commerce City, homelessness prevention assistance is provided by Maiker Housing Partners and Almost Home. Commerce City will support homelessness prevention initiatives that prioritize expanding the availability of homeless services and housing.

For PY 2022, the City will fund the Domestic Violence Victim Program to prevent homelessness, which helps families who are at-risk of domestic violence and leaving systems of care to find affordable housing.

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

Introduction:

Through the citizen participation process in the Consolidated Plan, the City identified several barriers to affordable housing, including increasing water and wastewater connection fees, lengthy development review processes, and pushback against multifamily housing from members of the community.

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

Water/Wastewater Connection Fees

The South Adams County Water and Sanitation District voted in April 2021 of the prior year to approve the water and wastewater connection fees proposed in its December 2020 study.

Navigating NIMBYism for Multifamily Housing

Rezoning in the past year have included one single family neighborhood and a Planned Unit Development (PUD) at Second Creek Farm. The Second Creek Farm PUD is proposed to include mixed use zoning to allow for some transit-oriented development. The plan originally called for both single-family and multifamily units (at least 60), in addition to commercial uses. The city relies heavily on the use of PUD zoning to create multifamily opportunities. The PUD model successfully allows some multifamily to be included in larger mixed-use developments in lieu of relegating multifamily units to their own zoning district. Additional actions by the city, including public education on the value of multifamily housing, may also help to reduce pushback from members of the public.

Internal Development Review Process

Several concerns expressed by developers about the City's development review process will be addressed internally. Members of the staff, including the new Chief Building Official, the CDBG Office, and the Housing Repair Programs (HRP) met in May of the prior year to strategize improvements to remove delays to the home rehabilitation inspection process, improve communications, and establish new affiliations.

Additionally, the City has recently filled many roles within the Community Development Department, including Permit Technicians, Building Inspectors, the Chief Building Official, Administrative Support, and City Planners. The City plans to fully staff its Community Development department with additional

positions being requested in this year's 2022 City budget.

Attracting and Maintaining Affordable Housing

Commerce City staff will continue to work with affordable housing developers to introduce creative housing opportunities using the city's PUD zoning flexibilities. In addition to attracting affordable housing developers, various departments in the City plan to work with the private sector and provide ongoing education for residents on the benefits of affordable housing projects. Finally, the CDBG Office will help maintain the City's existing affordable housing stock by sharing information with local service providers on housing availability and opportunities for residents to participate in the City's rehab/repair program.

AP-85 Other Actions – 91.220(k)

Introduction:

This section details Commerce City’s plans to develop safe and affordable housing for its residents, meet underserved needs, reduce poverty, develop institutional structure, and enhance coordination between public and private sector housing and community development agencies.

Actions planned to address obstacles to meeting underserved needs

Residents and stakeholders who participated in this planning process noted several underserved needs in Commerce City, including affordable housing, homelessness housing and services, and public facilities and services. Obstacles to meeting underserved needs include:

- Shortage of affordable housing due to factors such as increasing rents and home values and aging housing stock in need of rehabilitation,
- High costs of new development and associated need for subsidies for development of new affordable housing,
- Increasing homelessness due to high housing costs and need for services to connect residents with permanent housing and services, and
- Limited funding to provide needed public services and facilities.

The City and the CDBG Office plan to address obstacles to meeting these underserved needs by:

- Establishing community resource navigation and/or a reproducible resource guide;
- Entering the Adams County HOME Consortium to provide additional affordable housing;
- Providing basic services for people experiencing or at risk of homelessness;
- Continuing with the award-winning Domestic Violence Victim Program’s services to prevent homelessness and reduce crime;
- Partnering with Kids in Need of Dentistry to fund staff and services for LMI families to access pediatric dental services; and
- Providing wrap-around family support services through a partnership with homeless service providers in Commerce City.

To develop additional resources to address affordable housing, homelessness, and public services and public facility needs, the City will fund a variety of projects. These projects and planned activities are found in the AP-35 Projects section.

Actions planned to foster and maintain affordable housing

To maintain and expand the current affordable housing stock, the City of Commerce City will work to identify and develop partnerships with nonprofit housing organizations and private agencies with the goal of increasing the supply of affordable housing. These partnerships may include land acquisition, infrastructure placement, LIHTC, TIF, and partnerships with Community Housing Development Organizations or other developers considering housing projects in the city.

Commerce City expects to join the Adams County HOME Consortium for a three-year term beginning with the 2022 program year. The objectives of the HOME program are to ensure long term affordability of housing and to target assistance to households with less than 80% of area median income. Eligible activities include homeowner rehabilitation, repair, and reconstruction; homebuyer activities such as acquisition, rehabilitation, new construction, and down payment assistance; rental housing acquisition, rehabilitation, and new construction; and rental assistance.

The City will also look at using funding or grants that can be leveraged to bring new dollars for affordable housing or homelessness into the community. The City will also continue to increase housing affordability in Commerce City through the Minor Home Repair, Weatherization, Paint-a-Thon, and rental and mortgage assistance programs.

Projects to increase housing affordability in the 2022 program year include:

- Minor Home Repair Program (MHRP)
- Paint-a-Thon (PAT)

Actions planned to reduce lead-based paint hazards

An important initiative emanating from HUD in the last decade is the reduction of lead-based paint hazards, and many jurisdictions around the country have focused on reaching this goal. The federal Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of the Housing and Community Development Act of 1992) amends the Lead-Based Paint Poisoning Prevention Act of 1971, which is the law covering lead-based paint in federally funded housing. These laws and subsequent regulations issued by the U.S. Department of Housing and Urban Development (24 CFR part 35) protect young children from lead-based paint hazards in housing that is financially assisted or being sold by the federal government.

Should the City of Commerce City undertake any property rehabilitation projects, the City will assess whether lead-based paint might be present and, if so, follow the guidelines set forth in the Residential Lead-Based Paint Hazard Reduction Act of 1992. The City of Commerce City is committed to testing and abating lead in all pre-1978 housing units assisted with federal grant funds in any of the housing programs it implements.

Actions planned to reduce the number of poverty-level families

The City of Commerce City's anti-poverty strategy focuses on helping all low-income households improve their economic status and remain above the poverty level. To assist city residents the City will foster institutional cooperation and communication.

The City will establish and continue working relationships with programs for reducing poverty and supporting workforce development, including:

- The City will submit a budget proposal to hire and train a Community Resource Navigator in 2022.
- The Commerce City Small Business Resource Center works with several non-profits to provide workshops, trainings, and one-on-one counseling to support start-ups and to provide technical assistance to small businesses.
- The Adams County Workforce and Business Center provides resources for job seekers, youth, and businesses in Adams County;
- The nonprofit organization Adelante Community Development provides resources and events for Latino businesses in Commerce City;
- Cultivando provides Latino advocacy, family support services and health equity building;
- The Commerce City Community Campus (C4) provides a centralized location for health and social services in Commerce City;
- Community Resource Network will continue to be co-hosted by the CDBG Office; and
- The City provides numerous other public services assisting Commerce City residents and businesses.

Actions planned to develop institutional structure

The City will continue to work within existing partnerships and coalitions, such as the Continuum of Care, to work toward meeting local housing and service needs. The City of Commerce City will continue to work closely with state and local agencies and governments, nonprofit organizations, and other service providers to coordinate delivery of services to city residents. The City will submit a budget proposal to hire and train a Community Resource Navigator in 2022.

The City will complete its next Comprehensive Plan to 2045 this year. The Community Development Department is consulting various housing, homelessness, social service, elderly, and disability resource agencies to gather data and identify service gaps.

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, and agreements. The CDBG Office provides grant recipients with technical assistance, guidance, accounting, and oversight; reviews 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.

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

The City of Commerce City will continue to be an active participant in the Metro Denver Homeless Initiative. The Continuum of Care brings together nonprofit, government, and business leaders to provide a shared approach to goals of ending homelessness. Membership includes emergency, transitional, and permanent housing providers; nonprofit social service organizations; and government agencies.

The City will also continue to work with its two public housing authorities, CCHA and Maiker Housing Partners in the development of affordable housing for LMI residents in Commerce.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(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 the 2022 Annual Action Plan is 100%.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%