



2018 Annual Action Plan

Draft

Prepared by the
Community Development Block Grant Office

June 22, 2018

City of Commerce City, Colorado 2018 CDBG Annual Action Plan (AAP) *6.22.18 Draft*

Executive Summary

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

1. Introduction

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

The 2018 Annual Action Plan (AAP) was developed in accordance with HUD guidelines 24 Code of Federal Regulations (CFR) Part 91.220. This year's CDBG funded activities are outlined in the AAP. They adhere to the three national objectives established by HUD:

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

This document represents a cooperative effort between the City of Commerce City, the public, area businesses, and non-profits serving the Commerce City area. It outlines the City's needs, goals, and strategies for the 2018 AAP program year and addresses citizen involvement, including information on available and potential resources. The priorities developed in this plan target a wide range of issues. These issues span from basic needs, such as affordable housing, to quality of life issues, like crime prevention, neighborhood revitalization and helping seniors maintain their homes.

The City of Commerce City will receive an estimated \$462,444 in CDBG funds during its third program year, which runs from October 1, 2018 through September 30, 2019. This represents a ten percent increase over the 2017 program year. The City's Community Development Department, CDBG Office oversees the administration of the CDBG program. The CDBG Office provides the community

outreach, project application review, annual AAP preparation, environmental reviews, labor law compliance, interdepartmental/subrecipient guidance and oversight, project management, and general administrative duties. The CDBG Office regularly involves other city departments to accomplish the goals in the Consolidated Plan.

2. Summarize the objectives and outcomes identified in the Plan

Each year, the City dedicated 100% of the CDBG funds to high priority goals outlined in the 2016-2020 Consolidated Plan (ConPlan). In 2018, the City will continue to implement the project activities from the 2016 and 2017's AAPs.

In 2018 the City seeks to address the economic development needs outlined in the ConPlan, continue the MHRP and DVV programs and for the first time funding non-profit subrecipients to help address our housing needs.

Therefore, CDBG allocations will be used to meet the needs of LMI individuals in seven different ways in the 2018 AAP.

Crime Prevention/Victim Support

Support for Domestic Violence Victims (DVV) - This is continuation of an existing City program. Victims and their dependents will receive financial assistance for rent and utilities to escape their abuser. This reduces repeat abuse and prevents homelessness.

Preventing Homelessness

Access Housing, Inc. (AH) - Increase existing staff hours to provide additional: 60-day shelter services, transitional housing services, property management, case management, front-desk hours of operation, assistance with resources and links to community partners, counseling, and educational services.

The DVV project described above also will help the City prevent homelessness.

Home Renovations

Minor Home Repair Program (MHRP) – A continuation and increase of the new 2017 MHRP to address the health, safety, accessibility, energy efficiency and structural integrity of LMI owner-occupied homes through rehabilitation efforts.

Brothers Redevelopment, Inc., Paint-a-Thon Program (PAT) - Provide exterior paint and a yard clean-up for the disabled and/or seniors home

owners. BRI advertises, promotes, qualifies, equips, and organizes the volunteers for each home. The CDBG funds are used to purchase the paint and supplies to paint the exterior of the home and do a yard clean-up.

Arapahoe County Weatherization Program (AC WX) - AC WX provides weatherization services to income eligible household. Services begin with an energy audit of the home to determine the needed energy conservation measures for the home. Additionally, they determine if any health and safety issues need to be addressed. As needed, they replace combustion appliances (mainly furnace and water heaters) and insulate the home. All work is inspected to ensure quality and work specifications have been met.

All of the home renovation projects listed above will help improve the:

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

Economic Development

City of Commerce City's Small Business Resource Center (SBRC) -

Working with area non-profits, the SBRC desires to expand its abilities, availability, and services to entrepreneurs in the Service Area. The City will accomplish this project through two activities - staffing and renovations. One is a Public Service project and one is a Public Facilities project.

Staffing - This public services project will allow the City will contract for a part-time position to support the City's Economic Development Division as follows:

- i. Hold regular weekly hours to accommodate walk-ins at the SBRC
- ii. Assist the City in initiating a revolving loan program for small businesses.
- iii. Work towards the creation of a new financial literacy program and revolving loan fund for small C3 businesses
- iv. Partner and coordinate with additional non-profit economic service organizations to increase the technical assistance offered at the SBRC.

- v. Manage, schedule and operate the City of Commerce City's Small Business Resource Center, at 7270 Monaco Street.
- vi. Prepare outreach materials outlining new programs and services in English and Spanish.

Renovations - This public facilities project will renovate the facilities to meet the needs of expanding the learning, employment and marketing opportunities. Renovations include:

- i. A new presentation system including wiring, speakers, ceiling mounted projector and dropdown screen, wall mounted, wired and framed smartboard,
- ii. Increase internet capacity through router wiring, firewall and switch.
- iii. Install a standalone, analogue phone system including wiring, jacks and board.
- iv. Install lockable cabinetry and replace the window in the front of the facilities.

3. Evaluation of past performance

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

The City wisely heeded HUD's advice and limited the number of projects to be administered during the first few years as an Entitlement Community. Until the City is prepared to expand its administration abilities the City limited their 2016 and 2017 projects to not have to execute a Subrecipient Agreement or monitoring.

Accomplishments

Commerce City's past 20-month performance includes:

- a. Hired consultant for first Consolidated Plan - adopted
- b. Established a CDBG Division within the CD Department
- c. Hired a CDBG Coordinator
- d. Established a CDBG Office to administer the 2016 and write and administer future federal funding programs.
- e. Established financial accounts and protocols.
- f. Expanded the City's CDBG Team.

- g. Collected hundreds of contacts and resources to collaborate with and use as referrals.
- h. Established connections with other departments, agencies, service providers, and other governments.
- i. Established certifying officers.
- j. Established the project evaluation and ranking criteria
- k. Amended 2016 Annual Action Plan
- l. Drafted and adopted 2017 Annual Action Plan
- m. Entered plans into Econ Planning Suite in IDIS (HUD's software program)
- n. Amended the Citizen Participation Plan
- o. Adopted the *Analysis of Impediments to Fair Housing Choice* as prepared by Community Strategies Institute for Adams Co.
- p. Drafted, approved and submitted the first CAPER (Consolidated Annual Performance Evaluation Report) to HUD in IDIS (HUD's software program)
- q. Implemented a formal funding application process.
- r. Selected sidewalk projects to be installed and repaired with 2016 and 2017 funding.
- s. Began working with the Derby Downtown improvement project on bus stops to be improved with 2017 bus stop funds. Narrowed down the locations for bus stops to be improved with 2016 funds.
- t. Continued establishing connections with other departments, agencies, area service providers, and other governments.
- u. Became a member of the Derby Neighborhood group to assist with the redevelopment efforts.
- v. Co-founded the Community Resource Network of Adams County with three other service providers to meet, network with and learn about all the service providers to Adams County. The group meets six times a year.
- w. Prepared eight Environmental Reviews – All Exempt - in HEROS.
- x. Followed recently amended Citizen Participation Plan:
 - i. Held five, bilingual Public Input Meetings
 - ii. Interviewed 72 public service organizations and commissions about applying for funding – some are double counted because they were interviewed in 2017 and 2018.
 - iii. Received 31 Project Idea Forms from residents/city
 - iv. Mailed 194 introduction letters to area churches, HOAs, Mobile Home Parks, Schools, Apartment Complexes, etc.

- v. Met several times with City departments and the City Council about funding opportunities and applying for funding.
- y. The City received 25 proposals/applications for 32 projects.
- z. Reviewed the 32 project proposals for eligibility, viability and risk assessments.
- aa. Met seven times with the CDBG Team to review the process and applicants. Final review and ranking took place in June 2017 and May 2018.
- bb. CDBG Office joined the City's Emergency Services Task Force
- cc. Drafted the City's first Interdepartmental Understandings for the Park, Recreation, and Golf's Scholarship Program and the Police Department's Domestic Violence Victims (DVV) Program.
- dd. Drafted the appropriate forms and tracking forms for both the Scholarship and DVV programs.
- ee. Drafted the City's first set of program guidelines for the new Minor Home Repair Program.
- ff. Drafted the City's first Request for Proposal for the Minor Home Repair Program.
- gg. Drafted the City's Uniform Relocation Act.
- hh. Drafted the City's Limited English Proficiency Plan.
- ii. Drafted the City's Section 3 Plan.

Obstacles and Delays

The City's Public Works Department has encountered numerous obstacles in staffing. Since January of 2017, the CDBG Office has worked with three Project Managers, the Public Works Director, and an engineering firm to prepare the design documents and request for proposal on both the sidewalk and bus stop projects of 2016 and 2017. Unfortunately, three staff members left Public Works (PW) or were reassigned. These staffing losses seriously delayed the sidewalk and bus stop projects.

To compensate for the staff losses, the rehiring/training process, and to get the Public Works department back on schedule, they wisely hired three engineering firms to assist them in their backlog of design projects. One of these firms, Jacobs Engineering, was approached in December of 2017 to work on the CDBG projects. The CDBG office requested Jacobs Engineering work simultaneously on both the 2016 and 2017 sidewalk projects to accelerate the process and keep the 2017 sidewalk project from falling behind. Both sidewalk projects were defined and a task order was executed in May of 2018.

The CDBG office prepared the appropriate environmental review for the initial project engineering designs and for the preparation of the construction environmental review. Jacobs Engineering and the CDBG Office are currently preparing the construction Environmental Review and project design documents so the Request for Proposal (RFP) can be drafted and released. The City anticipates the environmental review to be completed and the RFP to be released in July; and the sidewalk projects to be completed by October 2018.

Additionally, the City's CDBG Office had staffing obstacles. Due to a serious illness, the CDBG Coordinator went on short-term and long-term disability, missing over 100 work days between July of 2017 and February of 2018. This delayed the environmental reviews, CAPER, completion and adoption of the Uniform Relocation Plan, Limited English Proficiency Plan and the Section 3 Plan. Plus, it contributed to the delays in the coordination and commencement of the sidewalk projects, Scholarship and DVV programs.

Goals

The CDBG Office desires to accomplish the following:

- a) Receive a good review from HUD during the City's first monitoring visit in May 2018;
- b) Complete and adopt as necessary the LEP, URA, and Section 3 plans as described previously;
- c) Define the coordination process between the Commerce City Housing Authority's (CCHA) Home Repair Loan Program and the CDBG's new Minor Home Repair program;
- d) Growing the inter-departmental relationships for project management;
- e) Educate funded City Departments and staff on CDBG project implementation;
- f) Continue discussing with Adams County, the Cities of Thornton and Westminster possible annual training sessions, perhaps with HUD's Technical Assistance funding, for area subrecipients. The training would educate potential subrecipients on the benefits and responsibilities of applying for and receiving CDBG funds;
- g) Expand the outreach and networking of the CDBG program with area resources and potential applicants;
- h) Increase resource materials for referrals by City staff to LMI residents in need;
- i) Better identify and evaluate the housing, economic, public facility and resident needs within the City;

- j) Identify gaps in available services and resources;
- k) Attend area group meetings within the: medical, veteran, disabled, ESL, prison, finance, educational, and business communities to better understand their needs and present the CEDBG program; and
- l) Individually contact area organizations including: Catholic Charities, Head Start, Boys and Girls Club, Cultivado, Salude health clinics, and Adams 14 and 27J school districts.

The City will continue to work diligently to learn of and address the needs of the community to help target CDBG funds to the most impactful projects; and by leveraging other resources through partnerships with service providers and the community.

Consultation and Citizen Participation

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

4. Summary of Citizen Participation Process and consultation process

The City made a concerted effort to identify and meet the needs in the community when developing the 2018 Annual Action Plan. The CDBG spent several months speaking with senior and youth services, non-profit organizations, faith-based organizations, educational services, housing services, neighboring governments, HUD staff, and key internal City departments. The goal of the consultations was to identify any needs not being adequately addressed within the City. If the needs identified could be assisted by the CDBG program, the organization was encouraged to submit a funding application for 2018. The CDBG Office increased the number of application projects by 50%.

During the early months of 2018, the CDBG Office conducted:

- Formal Presentations to: 40 organizations with 151 people in attendance
- Meetings and Phone Interviews: with 9 organizations - 13 people
- Presented to: 10 City Departments
- Citizen Contact by Phone or E-mail: 12 individual

For a total outreach of 201 people and 59 organizations.

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

Project Input Meetings. Three Public Input Meetings were held to obtain feedback from residents regarding the City's Community Development Block Grant (CDBG) program, including currently active and future Annual Action Plans. All the meetings were handicapped accessible. Fair housing laws and concerns were also discussed at each meeting.

The first was held at the Eagle Pointe Recreation Center, October 5, 2017, on the Consolidated Annual Performance Evaluation Report (CAPER). The second at the neighborhood Catholic Church – Our Lady Mother of the Church whose congregation is primarily Spanish speaking, on February 7, 2018. The third was at the Eagle Pointe Recreation Center on April 4, 2018. All meetings were held within the Target Area. The handouts were visually presented in both English and Spanish. A Spanish interpreter was advertised and present at two meetings. These meetings were published in the *Commerce City Sentinel* and *La Prensa de Colorado*.

Group Meetings. Presentations were made at seven group meetings on the City's CDBG program, including active and future Annual Action Plans. Fair housing laws and concerns were also discussed. The presentations were made to senior groups, youth groups, CRN of Adams County, City Council, and City staff.

City Newsletter. All three meetings were published in the City's bilingual, monthly newsletter – *Commerce City Connected*. This newsletter is delivered to each household in the City and is in English and Spanish. Plus, an informational announcement of the City's new CDBG program was printed. One of the Public Input Meetings had to be rescheduled and did not make the newsletter deadline.

Public Notification. A legal notice was posted in the local paper 17-days prior to the public hearing date. The notice informed residents of the public hearing to discuss the proposed 2018 Annual Action Plan and included a written public comment period to comply with the City's Citizen Participation Plan. The legal notice provided information on accessibility needs for people with disabilities, how to obtain information on special assistance, and contact information for Spanish speakers.

Public Hearing. On July 2, 2018, after a public hearing, the City Council will consider for approval the 2018 Action Plan and its submittal to HUD. The public hearing will be held at the City Council's Regular Meeting at Civic Center, an ADA accessible facility.

City Website. In 2017, the City's CDBG webpage was redesigned to include: the 2016 AAP projects as amended; the 2017 draft AAP; the 2018 draft AAP, HUD videos; contact information; a CDBG history; announcements on the Public Input Meetings and the Public Hearing. To derive additional public input a web

template called the Project Input Form was posted on the site to allow direct input of ideas for the public year-round. The City's website uses Google translate to the information posted into 105 languages.

In 2018, the CDBG Office continued to update the site and a new Fair Housing information page was placed on the Website and linked to the CDBG page. Additional updates and minor improvements have been made over the months, including adding the 2018 CDBG funding applications to the page.

Facebook & Twitter. Postings on the Public Input Meetings and the Public Hearings were sent out prior to the meetings.

Neighborhood Outreach Barbeques. In June, the CDBG Office provided information on the CDBG program, the upcoming Public Hearing, and the possible funding projects. Fair Housing materials were also handed out. These annual events are held in the northern and southern sections of the City. In 2017, they were held on June 8th and August 10th. These well attended, fun events, are held in area parks, with free food, entertainment and information booths about the City and area services/businesses. The August 10th event could not be attended because the CDBG Coordinator was on Short-term Disability.

Police Department Neighborhood Meetings. At the February 20, 2018 monthly Police Department Neighborhood meetings, at 7270 Monaco Street, Officer Rob McCoy presented the CDBG program to the attendees. He also distributed Fair Housing information.

5. Summary of public comments

 written public comments were received during the 30-day review period of the 2018 Draft AAP.

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

To be filled in after the close of the public comment period.

7. Summary

As the City enters into its third year of the 2016-2020 Consolidated Plan, it will continue to fund projects in accordance with the goals and objectives outlined in the Consolidated Plan. These projects are designed to meet identified priority needs. Continued collaboration between City departments, HUD staff, and outside service agencies will be integral to the success in meeting the goals and priorities. Concerted efforts will continue to ensure Commerce City residents

understand CDBG and have direct access to provide input on how the CDBG funds are spent.

2016-2020 Consolidated Plan Identified Goals	2016	2017	2018
Neighborhood Revitalization (Core City) <ul style="list-style-type: none"> ➤ Street, Road or Sidewalk/ADA Improvements ➤ Neighborhood Clean-ups ➤ Demolition & Clearance of Blighted Property ➤ Drainage Improvements 	X	X	
Housing Needs <ul style="list-style-type: none"> ➤ Elderly Housing ➤ Homeowner Rehabilitation/Repair ➤ Energy Efficiency Improvements 		X	X X X
Economic Development <ul style="list-style-type: none"> ➤ Employment Training ➤ Financial Assistance for Entrepreneurs & Small Businesses ➤ Business Incubator 			X X
Public Services <ul style="list-style-type: none"> ➤ Youth/Senior Activities ➤ Crime Prevention/Drug Abuse Education ➤ Homelessness Prevention ➤ Coordination of Organizations & Resources 		X X X X	X X
Fair Housing Activities	X	X	X

Agencies, groups, organizations and others who participated in the process and consultations

1. 9News
2. Access Housing
3. Adam 14
4. Adams 27J
5. Adams County Economic Development
6. Adams County Head Start

7. Adams County Health Authority
8. Adams County Medicaid
9. Adams County Transit Council
10. Adams County Weatherization
11. Aflac
12. Almost Home
13. Aurora Community Connection
14. Aurora Network
15. Broomfield
16. Brother's Redevelopment
17. CFRT
18. City of Westminster
19. Colorado Gerontological Society
20. Colorado Housing Connects
21. Colorado Oral Health
22. Commerce City CDBG Team
23. Commerce City City Council
24. Commerce City Communications
25. Commerce City Economic Development Department
26. Commerce City Neighborhood Services
27. Commerce City Parks, Recreation & Golf
28. Commerce City Planning Department
29. Commerce City Police Department – YHOP and DVV
30. Commerce City Public Works Department
31. Commerce City Senior Center
32. Commerce City Senior Commission
33. Commerce City Senior Luncheon
34. Commerce City Seniors
35. Commerce City Youth Commission
36. Community Advocate Council
37. Community First
38. Community Reach
39. Community Resource Gathering – Thornton
40. Community Resource Network of Adams County
41. Community Uplift Partnerships
42. CSU – Extension
43. Derby Neighborhood Planning Team
44. Denver Metro Fair Housing Center
45. Family Tree
46. Hunger Free Colorado
47. Innovage
48. Kid Colorado Schools
49. Kids First
50. Neighborhood Public Input Meeting #1

51. Neighborhood Public Input Meeting #2
52. Northern Denver Metro Small Business Development Center
53. Nueva de la Musica
54. Open Table – From Poverty to Community
55. Pasco
56. Platt Valley Medical Center
57. Project Angel Heart
58. Salude
59. Spectra Center

Expected Resources

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

Introduction

Entitlement grant resources for 2018 are estimated at \$462,444. The grant is to principally benefit LMI residents by providing decent housing, aid in the prevention or elimination of slums or blight, provide suitable living environments, expanded economic opportunities and meet urgent community needs.

The City seeks to use its CDBG Program funds in partnership with capable agencies to include public and private partners, developers, financial lending institutions, and nonprofit organizations. Below is a description of the anticipated funding for the CDBG Programs based on the allocation for the current program year.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				Expected Amount Available Remainder of ConPlan 2019-2020
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	
CDBG	Public-Federal	Public Services Housing Economic Development Administration Fair Housing	\$462,444	\$ 0	\$0	\$462,444	\$924,000

Table 1 - Anticipated Resources

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

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

Specifically, through the 2018 AAP the City will endeavor to leverage funds from programs like:

- Arapahoe County Weatherization
- GRID
- Volunteers of America
- Colorado Housing Connects
- Colorado Enterprise Funds
- Adelante
- City of Commerce City – ED, PD, CD Departments

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

Commerce City owns the Small Business Resource Center (SBRC) located in the Derby Neighborhood commercial district. The role of the SBRC supports local businesses and potential entrepreneurs grow their businesses through technical, educational and marketing support.

The City's Economic Development Department manages the SBRC and currently works with three partners: the Small Business Development Center, Chamber of Commerce, and Adelante. Renovations and increased staffing will help the SBRC address the economic development needs such as local employment growth, establishing a small business revolving loan program, and promoting small business development. These efforts will combat poverty as detailed in this plan.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Public Services	2017	2019	Non-Housing Community Development	Citywide	Public Services Supporting Low/Mod Income & Special Needs Populations: Crime Prevention, Homelessness Assistance	\$ 25,000	Assist domestic violence victims escape the violence and avoid homelessness: 19 households assisted. 59 residents assisted
2	Public Services	2018	2019	Non-Housing Community Development	Citywide	Public Services Supporting Low/Mod Income & Special Needs Populations: Homelessness Assistance	\$ 21,840	Public Service: 120 households assisted. Equals 378 people assisted
3	Public Services	2018	2019	Non-Housing Community Development	City Wide	Economic Development	\$ 22,460	Economic Development: 200 people assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Revolving Loan Fund; Job Training	2018	2019	Non-Housing Community Development	City Wide	Economic Development	\$ 50,000	Economic Development: 200 people assisted
5	Home Repair:	2018	2019	Non-Homeless Special Needs	Citywide	Neighborhood Revitalization	\$ 25,000	(PAT) Owner-occupied LMI housing rehabilitation: 16 households assisted
6	Home Repair:	2018	2019	Affordable Housing	Citywide	Preserve & Expand Affordable Housing; Neighborhood Revitalization	\$ 70,000	(ACW) Owner-occupied LMI housing rehabilitation: 14 households assisted
7	Minor Home Repair Program:	2017	2019	Affordable Housing	Citywide	Preserve & Expand Affordable Housing; Neighborhood Revitalization	\$155,655	(MHRP) Owner-occupied LMI housing rehabilitation: 16 households assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Administration & Planning	2018	2019	Non-Housing Community Development	Citywide	Administration & Planning	\$92,489	CDBG administration, plan preparations, FHEO outreach

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	Public Services
	Goal Description	To provide Domestic Violence Victim support with temporary housing & utility financial payments for victims of domestic violence and their dependents.
2	Goal Name	Public Services
	Goal Description	Increase assistance to homeless and at-risk homeless families.
3	Goal Name	Economic Development
	Goal Description	Provide economic development and small business support services to entrepreneurs through technical education, loan assistance, job recruitment and job training.
4	Goal Name	Public Facilities
	Goal Description	Renovate the Small Business Resource Center to meet the needs of expanding the Center's learning, employment and marketing opportunities.
5	Goal Name	Home Repair Program
	Goal Description	Paint the exterior of homes, yard clean-ups, and other exterior services for disabled and senior home owners.
6	Goal Name	Home Repair Program
	Goal Description	Provide weatherization services including energy audits, health and safety assessments, insulation, combustion appliance repairs and replacements to LMI households.
7	Goal Name	Home Repair Program
	Goal Description	To help homeowners make needed home repairs to meet health, safety, accessibility, and other rehabilitation needs.
8	Goal Name	Administration and Planning
	Goal Description	Administration and planning functions associated with the CDBG program. Fair Housing law outreach and training.

Table 3 - Goal Descriptions

Projects

AP-35 Projects – 91.220(d)

Introduction

Projects planned for the 2018 program year are identified below. Additional details are provided in Section AP-38.

Projects

#	Project Name
1	Domestic Violence Victim Support
2	Access Housing Staff Increases
3	Small Business Resource Center Staffing
4	Small Business Resource Center Renovations
5	Brothers Redevelopment's Paint-a-Thon Program
6	Arapahoe Co. Home Weatherization Program
7	Minor Home Repair Program
8	CDBG Program Administration & Planning

Table 4 – Project Information

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

All of the listed projects meet a high priority need, goal and objective as outlined in the City's 2016-2020 Consolidated Plan. By supporting and funding these projects, the City is addressing several underserved needs of the community. Each of the allocation priorities were developed based on input received from the City, including citizens, City staff, and representatives from area nonprofit organizations. The organizations included: housing providers, homeless housing and service providers, senior and youth services, fair housing advocates, community development organizations, medical providers, workforce centers, and others.

Recent US Census and ACS data, visual inspections by City staff, the needs of special populations, and non-housing community development needs also guided allocation priorities.

The City's rapid growth rate escalates and intensifies the identified needs. The estimated population as of January 1, 2018 is 57,256, which is an increase in growth rate of 4.35% since July 1, 2016, when the population was 54,869. In comparison, the Denver-Aurora CSA population change from 2016 to 2017 was 1.4%.

Housing

The Denver Post reports:

Home price gains in metro Denver are rising at a double-digit pace this year after taking a breather in 2017, pushing the average price of a single-family home sold in February above \$500,000 for the first time, according to [the Denver Metro Association of Realtors](#). The average price of a single-family home sold in metro Denver reached \$502,986 in February, up 2.5 percent from January and 11.8 percent from February 2017¹.

And CNNMoney states:

A recent report by government-backed mortgage giant Freddie Mac found that the amount of housing in Colorado that was affordable to people making less than half of the median income had plunged by more than 75% between 2010 and 2016 -- one of the biggest decreases in the country. According to real estate site Apartmentlist.com, median rent for one-bedrooms in the state has risen 22.4% since the beginning of 2014 — twice the nationwide increase. Denver's rents now sit 12.6% above the national average².

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

¹ Average price of a single-family home in metro Denver passes half-million dollar mark.
Higher mortgage rates fail to keep home prices in check
By Aldo Svaldi | asvaldi@denverpost.com | The Denver Post
PUBLISHED: March 5, 2018 at 12:54 pm | UPDATED: March 6, 2018 at 12:46 am
<https://www.denverpost.com/2018/03/05/metro-denver-average-home-price/>

² How Colorado became one of the least affordable places to live in the U.S.
by Lydia DePillis | @CNNMoney | PUBLISHED: November 1, 2017: 6:09 AM ET
<http://money.cnn.com/2017/11/01/news/economy/colorado-housing-prices/index.html>

From 2015-2016 the City ranked 81st with a growth rate of 2.3% according to the US Census calculations of *Population Change for Incorporated Places of 50,000 or More*. As the City grows it becomes more culturally diverse. The City has successfully diversified its outreach efforts and continues to publish its materials in English and Spanish.

The City also recognizes the hidden population of undocumented immigrants. Using the 2014 population estimate showing an additional 3.8% of statewide residents as undocumented³. Therefore, in 2018, the City has an estimated 2,176 additional undocumented residents. Utilizing the person per household average of 3.15, an additional 690 homes are needed to house undocumented residents within the City. All of the conditions described previously amplify the pressures on LMI residents when finding decent and affordable housing within their price range.

To combat the loss of available affordable housing and increasing homelessness, the City seeks to assist LMI homeowners remain in their homes. LMI homeowners at risk of losing or leaving their homes because of financial pressures, accessibility issues, or unsafe living conditions can benefit from the MHRP, AC WX, and PAT programs. These programs will preserve existing affordable housing stock, increase their value, and make them safer. As these rehabilitated homes are sold, an increased supply of improved, decent, safe, and relatively affordable housing will enter the market.

Economic Development/Public Services

As stated in the ConPlan, the City, Adams County, the City's 2014 Citizen Survey all rank economic development as a high priority. Per the ACS data in section MA-45 of the ConPlan, the City's unemployment is 9.37%. It is especially high for ages 16-24 sitting at 33%. The needs recommendations are for the City to invest in job training, employment services, and to increase community college attendance among residents.

The City of Commerce City developed a Strategic Action Plan around the issue of economic development in 2010. The plan includes a set of strategies that establish a framework for connecting, networking and leveraging important economic development, education, workforce and industry assets to attract new

³ Undocumented immigrant workers number 140,000 in Colorado, Pew estimates

By ALDO SVALDI | The Denver Post | PUBLISHED: November 3, 2016

<http://www.denverpost.com/2016/11/03/pew-undocumented-immigrant-workers-number-140000-in-colorado/>

employers, strengthen existing companies, encourage entrepreneurship, foster community collaboration, and make the region more competitive for industries. This year's AAP supports entrepreneurship, community collaborations, and assist employers with job training and recruitment.

Obstacles

There are obstacles in forming and implementing the City's 2018 AAP. However, the numerous high priority community needs compel the City to take action.

Implementing the multi-step program will take expertise the City does not currently possess. To reduce the workload on the CDBG Office, the City will hire an experienced consultant/contractor to perform much of the Minor Home Repair Program's delivery.

The 2018 AAP brings in three Subrecipients to the CDBG Program. These will be the first non-profits the City has funded, will need to provide administrative training and oversight.

Additional obstacles also include the timely administration of the CDBG Program. The weighty administration requirements will challenge the City's existing staff resources.

AP-38 Project Summary

Project Summary Information

Numerous qualified funding requests were made for CDBG public service programs. Two major restraints prevented the City from funding all of these important requests: the 15% budget cap imposed by HUD and the City's limited CDBG administrative staff. Balancing the need to keep the City's CDBG program simple to start with the pressing needs of the community, the City limited the total number of projects to fund to seven, which are divided into three categories: housing, economic development and public services. Three of the recipients are non-profit agencies (subrecipients) and four are City departments.

Finally, all of the submitted projects were evaluated and ranked based on the Consolidated Plan's identified needs, the largest impact of each dollar per resident, and how they address the goals of plans already approved by the City.

1	Project Name	Public Services - DVV
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Public services supporting Low/Mod and special need populations
	Funding	\$25,000
	Description	Through the Police Department's Victim Services Department – provide temporary financial support by paying for housing and utilities for domestic violence victims, and their dependents.
	Target Date	9/30/2019
	Estimate the number and type of persons that will benefit from the proposed activity	19 households will benefit. Using the City's average per household multiplier of 3.15 approximately 60 victims of domestic violence will benefit.
	Location Description	Police Department, 7887 E. 60 th Avenue, Commerce City, CO 80022
	Planned Activities	Direct payment of rent, mortgage or hotel rooms and utilities to house the victims. Provide or refer needed services to assistance the family's long-term escape of the abuser.
2	Project Name	Public Services – AH
	Target Area	Citywide
	Goals Supported	Public Services
	Needs Addressed	Assist persons who are homeless through emergency, transitional, and permanent housing and supportive services.
	Funding	\$21,840
	Description	Increase three staff position hours at Access Housing to expand their services and assistance to families in their emergency 60-day shelter and their transitional apartment housing.
	Target Date	March 1, 2020
	Estimate the number and type of persons that will benefit from the proposed activity	120 at risk and homeless households assisted. Using the 3.15 multiplier equals 378 persons assisted.
	Location Description	Access Housing, 6978 Colorado Boulevard, Commerce City, CO 80022

	Planned Activities	Provide at risk and homeless families with intensive case management, basic needs, crisis intervention, victim advocacy, resource information, emergency and transitional housing.
3	Project Name	Public Service SBRC - Staffing
	Target Area	Service Area
	Goals Supported	Revolving Loan Fund Establishment; Business Support Services/Job Training
	Needs Addressed	Economic Development: provide economic development and small business support services to entrepreneurs to revitalize blighted commercial districts.
	Funding	\$22,460
	Description	Increase economic development and small business support services to entrepreneurs through technical education, loan assistance, job recruitment and job training.
	Target Date	March 1, 2020
	Estimate the number and type of persons that will benefit from the proposed activity	200 people will be assisted.
	Location Description	7270 East Monaco, Commerce City, CO 80022
	Planned Activities	Contract for staff person to run the SBRC; to renovate the outdated SBRC facilities
4	Project Name	Public Facilities SBRC - Renovations
	Target Area	Service Area
	Goals Supported	Revolving Loan Fund Establishment; Business Support Services/Job Training
	Needs Addressed	Economic Development: provide economic development and small business support services to entrepreneurs to revitalize blighted commercial districts.
	Funding	\$50,000
	Description	Increase economic development and small business support services to entrepreneurs through technical education, loan assistance, job recruitment and job training.
	Target Date	September 30, 2019

	Estimate the number and type of persons that will benefit from the proposed activity	200 people will be assisted.
	Location Description	7270 East Monaco, Commerce City, CO 80022
	Planned Activities	Renovate the SBRC to meet the needs of expanding the Center's learning, employment and marketing opportunities.
5	Project Name	Brother's Redevelopment's Paint-a-Thon Program
	Target Area	Citywide
	Goals Supported	Home Repair
	Needs Addressed	Preserve and Expand Affordable Housing
	Funding	\$25,000
	Description	Owner-occupied, housing rehabilitation for LMI residents
	Target Date	September 30, 2019
	Estimate the number and type of persons that will benefit from the proposed activity	17 households. This will benefit 54 people.
	Location Description	The location of the homes which will receive funding through the program have yet to be determined.
	Planned Activities	Provide paint and supplies for exterior home painting and yard clean-up for disabled and senior home owners.
6	Project Name	ACW Home Weatherization
	Target Area	Citywide
	Goals Supported	Home Repair
	Needs Addressed	Preserve and Expand Affordable Housing
	Funding	\$70,000
	Description	Energy efficiency for LMI households
	Target Date	September 30, 2019
	Estimate the number and type of persons that will benefit from the proposed activity	14 households. 44 LMI residents will benefit
	Location Description	The location of the homes which will receive funding through the program have yet to be determined.

	Planned Activities	Provide weatherization services including energy audits, health and safety assessments, insulation, combustion appliance repairs and replacements City households.
7	Project Name	Minor Home Repair Program
	Target Area	Citywide
	Goals Supported	Affordable Housing
	Needs Addressed	Preserve & Expand Affordable Housing, Neighborhood Revitalization
	Funding	\$155,655
	Description	Owner-occupied, housing rehabilitation for LMI residents
	Target Date	November 30, 2019
	Estimate the number and type of persons that will benefit from the proposed activity	16 owner-occupied homes will be rehabilitated; approximately 50 residents
	Location Description	The location of the homes which will receive funding through the program have yet to be determined.
	Planned Activities	Rehabilitation of owner-occupied homes to meet health & accessibility, energy efficiency and other needs
8	Project Name	CDBG Program Administration & Planning
	Target Area	Not applicable
	Goals Supported	Not applicable
	Needs Addressed	Not applicable
	Funding	\$92,489
	Description	The City will use CDBG funds to carry out activities associated with program planning, administration, and management to comply with CDBG requirements.
	Target Date	12/31/2019
	Estimate the number and type of persons that will benefit from the proposed activity	Not applicable
	Location Description	7887 E. 60th Avenue, Commerce City, CO 80022

	Planned Activities	Staff, consultants, outreach, education, supplies, plans, and office costs associated with the administration and planning of the CDBG programs to be in compliance with CDBG regulations.
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Table 5 - Project Summary Information

Allocation Changes

All of the allocated funding amounts mentioned in this 2018 AAP are based on the City receiving the HUD estimated \$462,444. Should any of these projects not receive all or part of their funding amount, such as applicant withdraw and project changes, the unused funds will be reallocated to one or more of the remaining projects. If the funding is less than estimated, the missing funding will be reduced from the Minor Home Repair Program.

AP-50 Geographic Distribution – 91.220(f)

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

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

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

Commerce City, Colorado – General Maps

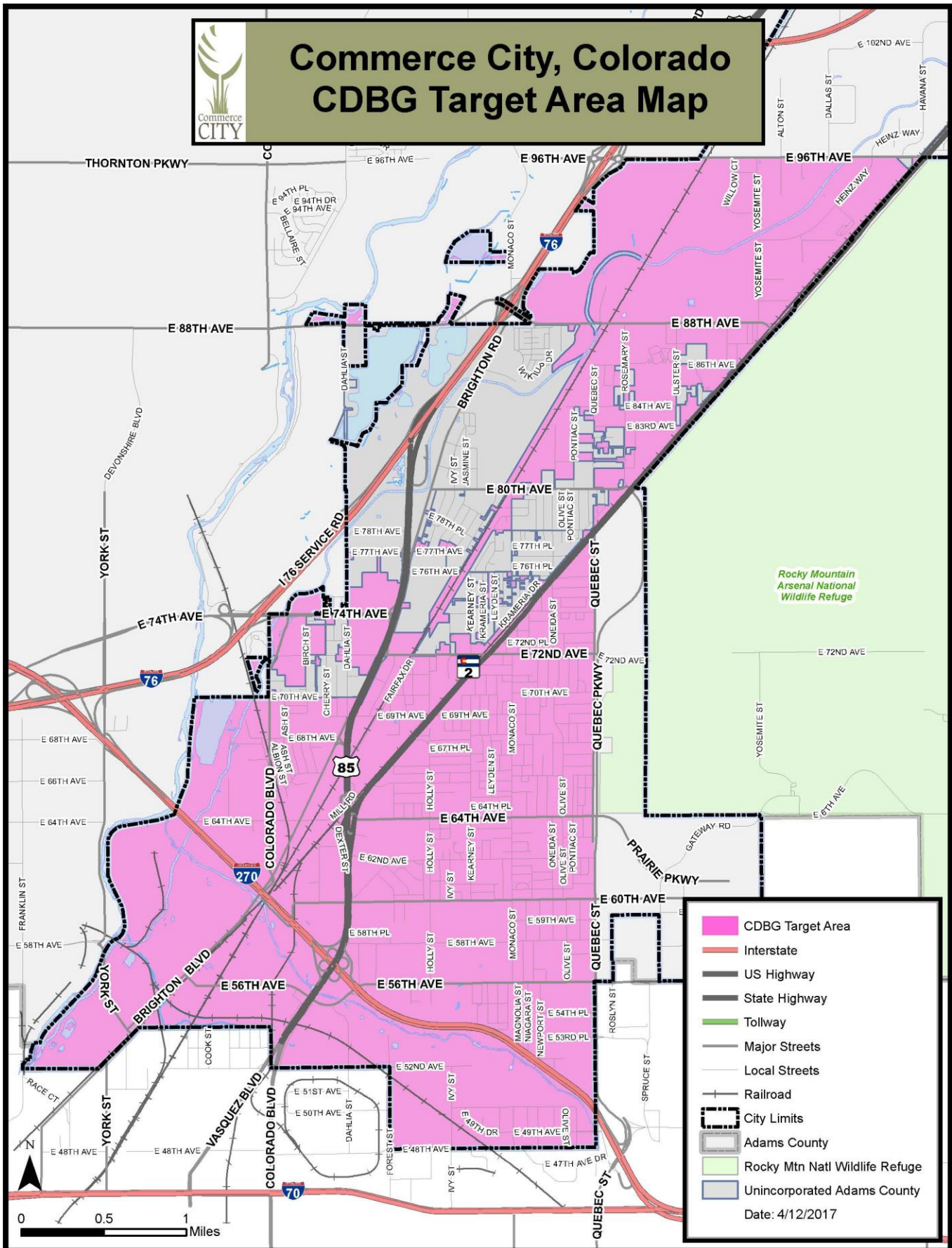
The following four maps depict:

1. Commerce City Limits
2. Commerce City's CDBG Target Area
3. Commerce City's Census Block Group LMI Census Block Groups
4. Commerce City's Census Tracts – Northern Range

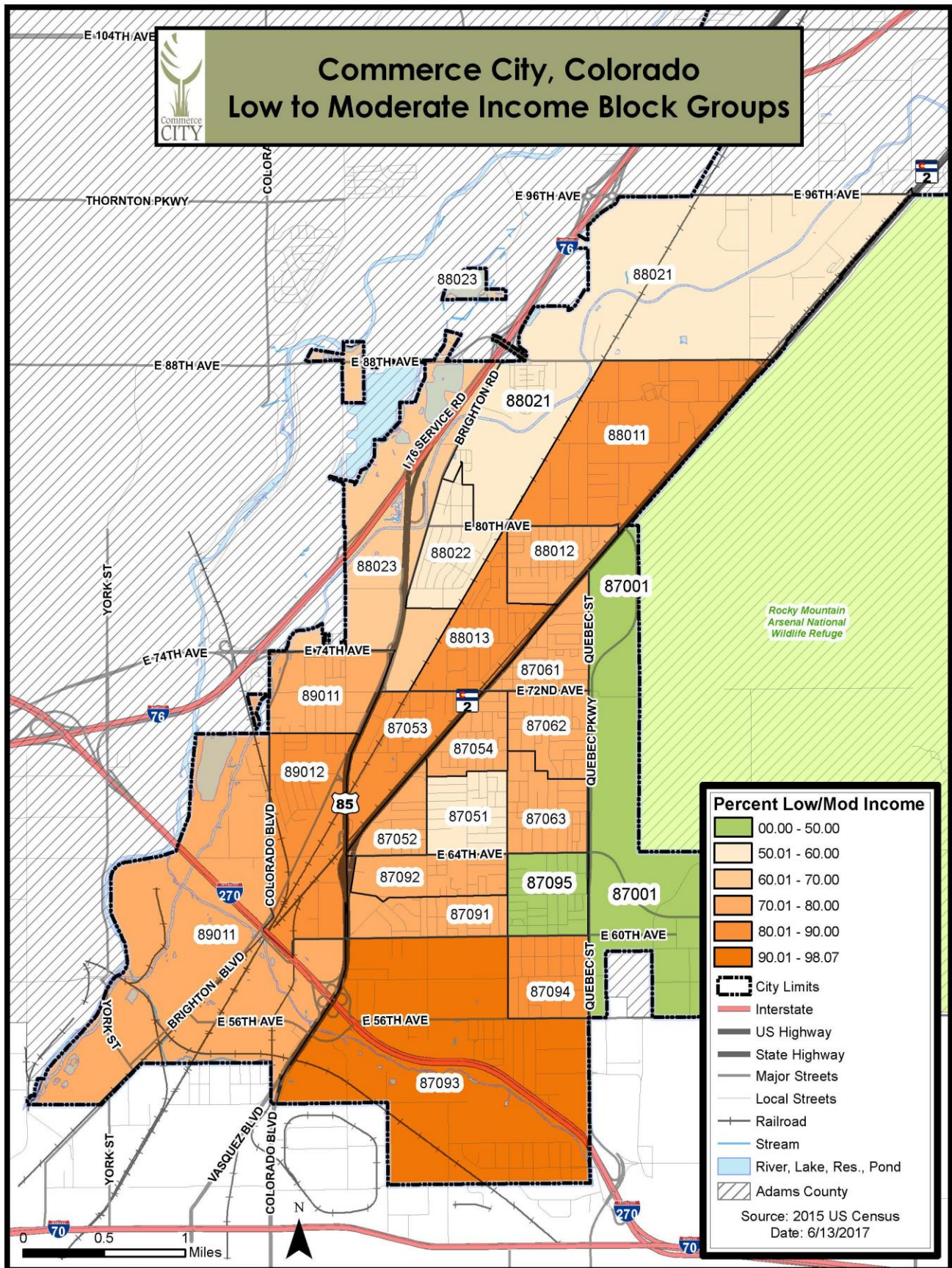
The areas shaded on maps 2 and 3 will be prioritized for allocation of CDBG resources. However, individual low- and moderate-income persons and several special populations residing anywhere in the City may be eligible beneficiaries of CDBG funds.



Commerce City, Colorado CDBG Target Area Map



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



Geographic Distribution

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

Table 6 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

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

The Northern Denver Metro Small Business Development Center serves the northern sections of the City. According to HUD regulations, the Small Business Resource Center (SBRC) cannot overlap with comparable activities. Therefore, the very northern census tracts of the City, 85.23 and 85.36 are excluded from the Service Area for the SBRC, because they are served by the North Denver Small Business Development Center located 22 S. 4th Ave, Suite 305 in Brighton and at the Front Range Community College - Westminster Campus. Using HUD's ACS LowMod Census Tract Data, this Service Area contains 55.3% LMI residents.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

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

To address these needs, the City has added the ACW Weatherization project and the Paint-a-Thon Program. Additionally, the City increase the funding for and will to continue to implement the Minor Home Repair Program in 2018 Program Year. In later years, the City may use grant funds for public infrastructure improvements or other site improvements to support neighborhood revitalization, housing development and/or rehabilitation loans for LMI households.

Goals for the number of households to be supported in 2018 program year are provided below. The City expects to continue its CDBG investment in affordable housing in future program years.

One Year Goals for the Number of Households to be Supported	
Homeless/At-risk of Homelessness	120
Non-Homeless	39
Special-Needs (DVV+PAT)	35
Total	194

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

One Year Goals for the Number of Households Supported Through...	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	47
Acquisition of Existing Units	0
Total	47

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

Discussion

The City recognizes, and the Consolidated Plan describes in detail, a high priority need for the preservation and expansion of affordable housing. With the hiring of a full-time CDBG Coordinator in 2017, Commerce City has further developed its program management capacity. Therefore, future investment in affordable housing programs can occur in 2018 Program Year.

All of the home renovation projects listed above will help improve the:

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

The Minor Home Repair Program (MHRP) will provide grants up to \$7,500 to rehabilitate approximately 16 owner-occupied homes. The City expects to engage the services of a home repair contractor to continue to assist in the operations of the second year of the MHRP. This program will prioritize the repair work based on improving the safety, health, energy efficiency, and accessibility of the residents in their homes. Educational and referral components of the MHRP will 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 homes and provide yard clean-up for the disabled and/or seniors home owners. This subrecipient will advertise, promote, qualify, equip, and organize the volunteers for each home. The CDBG funds are used to purchase the paint and supplies to paint the exterior of the home and do a yard clean-up.

The Arapahoe County Weatherization Program (AC WX) will provide weatherization services to income eligible household. Services begin with an energy audit of the home to determine the needed energy conservation measures for the home. Additionally, they determine if any health and safety issues need to be addressed. As needed, they replace combustion appliances (mainly furnace and water heaters) and insulate the home. All work is inspected to ensure quality and work specifications have been met.

To further meet the housing needs in the City, the CDBG Office is coordinating with the Commerce City Housing Authority (CCHA). CDBG and CCHA will work together to complement each other's program and make and coordinate the

application process for LMI homeowners between the grant and loan programs. This cooperation would include marketing, possible process streamlining, and applicant referrals.

The MHRP applicants may also be directed to the CCHA. The CCHA has a larger housing rehabilitation loan program with an estimated limit of approximately \$20,000. The CCHA will perform their own independent loan application evaluation and either accept or deny the applicant.

AP-60 Public Housing – 91.220(h)

Introduction

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

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

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

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

- In the spring of 2017, the CCHA partnered with private developers to development a 216-unit affordable housing development. Ground was broken in 2017 and completion of the construction on this project is anticipated to in 2018.
- Evaluating CCHA's properties to ensure efficient and effective use.
- Continue to examine possibilities to expand the voucher program to help address current unmet housing needs in Commerce City.
- Support efforts by the City's Neighborhood Services Division to strengthen enforcement of code violations thereby improving the health, safety and livability of area neighborhoods.

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

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

- Collaborate with partners to educate residents about home ownership and mortgage programs and practices.
- Examine opportunities for CCHA to support existing residents to develop important home ownership 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 which encourage all residents to become active and involved within their community, including awareness and involvement in their neighborhoods, their surroundings, and crime prevention.

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

The CCHA is not covered by a PHA Plan and is not subject to a HUD review or designation of this type. The Unison Housing Partners (formerly Adams County Housing Authority) is designated a “High Performer” based on its 2014 score report in the Public Housing Assessment System, with maximum scores for the agency’s financials, management, and capital fund health. The following table provides a score breakdown by indicator:

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

Table 9 – Unison Housing Partners (formerly Adams County Housing Authority) Scores

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

Introduction

This section identifies actions Commerce City will take over the next year to address homelessness and other special needs. The 2016-2020 Consolidated Plan, considers homelessness and other special needs as high priority needs.

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

Over the next year, the City will:

1. Continue to provide funding to the Commerce City/Brighton Police Department's joint Victim Service Unit Domestic Violence Victim Program (DVV). The DVV provides victims, and their dependents, with emergency assistance to escape the abuser and keep a roof over their heads. This temporary, emergent, financial support through the VSU, pays for housing and utilities costs. Half of the 389 victims assisted in 2017, needed financial assistance to avoid homelessness. The CDBG funding will expand the assistance provided to approximately 19 households (59 residents) who are domestic violence victims.
2. Access Housing, Inc. project will increase services to existing homeless families including the 60-day shelter services, transitional housing services, property management, case management, front-desk hours of operation, assistance with resources and links to community partners, counseling, and educational services. AH seed to assist an additional 120 households, which is approximately 378 people.
3. The Minor Home Repair Program and the Arapahoe County Weatherization program seeks to help LMI families rehabilitate and weatherize their homes. This will extend the life and livability of these homes. The MHRP will also include homeowner education and resources to help owners maintain and afford their home, thereby avoiding homelessness. Additionally, the increased equity in their home increases their economic standing and security. The MHRP will also provide accessibility improvements which increases the time elderly and disabled residents can stay in their homes. This decreases the pressure on the area's affordable housing for seniors and the disabled.

4. The Paint-a-Thon and yard clean-up program help approximately 17 elderly and/or disabled owners maintain and afford their home, thereby increasing the home's value and avoiding homelessness. The increased equity in their home increases their economic standing and security. Safety and sanitation may also be improved with the yard cleanups. Neighborhood revitalization will also be realized with this project.
5. The Fair Housing Activities will educate the housing professionals and residents on the laws, regulations, and rights of the individual. This will help prevent future housing discrimination and promote discrimination reporting and resolution. Helping to prevent discrimination will allow better access to housing and increased retention of housing, thereby avoiding homelessness.
6. The City will continue to coordinate and link resources to assist residents at risk of homelessness reduce their costs and access needed resources.

Other than CDBG...

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

In 2018, the City funded \$36,625 in housing and homelessness assistance from the QCF's budget. Plus, they provided staff to run the foundation, and supported the City appointed QCF Board. The City also sponsors two annual fundraisers for the QCF.

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

1. Access Housing received \$7,500 to help homeless families regain their independence and self-sufficiency. They anticipate helping 35 persons with the funding.
2. Almost Home received \$7,500 to provide housing assistance for the homeless and those in need. They anticipate helping 73 persons with the funding.
3. Brothers Redevelopment Inc. Paint-a-Thon program received \$5,000 to assist three LMI homes owned by seniors/disabled residents. This will help 10 people.

4. CASA of Adams & Broomfield Counties received \$7,500 to advocate for abused and neglected youth in search of permanent homes. They anticipate helping 65 persons with the funding.
5. Catholic Charities and Community Services of the Archdiocese of Denver, Inc. received \$5,000 for emergency assistance to individuals and families to prevent homelessness. They anticipate helping 90 persons with the funding.
6. Mercy Housing Mountain Plains received \$4,125 to create stable, vibrant, and healthy communities by developing, financing, and operating affordable, program-enriched housing for families, seniors, and people with special needs to lack the economic resources to access to quality, safe housing opportunities.

Additionally, in 2018, the QCF prevented and/or assisting the homeless by funding three food banks (\$16,000); four medical and mental health non-profits (\$28,000); five educational and job readiness/training programs (\$19,200); and six family and youth assistance programs (\$29,000).

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

The City's CDBG program funding Access Housing reaches out and connects to homeless persons.

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

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

Addressing the emergency shelter and transitional housing needs of homeless persons

The City CDBG Office and the CCHA will provide referrals to homeless persons or residents at-risk of being homeless. This includes producing and distributing a Resource Directory to City staff and educating City them on its contents.

The City assistance in re-establishing Community Resource Network group will also improve delivery of services and resources to the homeless and residents at risk of becoming homeless.

The City of Commerce City will continue to partner with local nonprofit organizations to expand emergency and transitional housing for homeless

persons. The City will also continue to seek out new partnerships with, nonprofits, faith based organizations, the school districts, and other such community programs.

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

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

In Commerce City, Access Housing operates a rapid rehousing program designed to shorten the time individuals and families experience homelessness. It also seeks to help homeless families make the transition to permanent housing through its Home Again Family Support Program and to live independently through its STEPS Success Self-Sufficiency Program. The 2018 AAP funds Access Housing's increased staffing needs.

The City's CDBG Office established a close working relationship with Access Housing staff and will continue to seek to expand housing opportunities and services for homeless persons, including those making the transition to permanent housing.

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

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

In addition to identifying homelessness as a priority need, the 2016-2020 Consolidated Plan identified the need for additional affordable housing. The

CDBG Office and the CCHA will continue to work with local partners to: develop additional affordable housing units, reduce living expenses, providing emergency services to domestic violence victims, and senior resources.

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

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

Introduction:

According to the following 2016 & 2017 articles in The Denver Post:

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

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

Home purchase costs, which consumed 35.6 percent of average incomes historically in Adams County, **are now eating up 43.8 percent of the average weekly wage.**⁴

And...

... the median price of a home sold in Adams County dropped from \$184,000 in the summer of 2006, the last market peak, to \$145,000 in late 2011. But in the first quarter of this year, the median was up to \$290,000, **a doubling in a little over five years**, according to ATTOM's numbers.⁵

⁴ *Northern Front Range is an Epicenter of Rising Home Unaffordability; Low Affordability has Colorado Housing Markets Skating on Thin Ice*
Rapidly rising mortgage rates could put homes out of reach next year for many
By ALDO SVALDI | The Denver Post | PUBLISHED: December 21, 2016

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

Housing affordability is a key issue affecting the entire Denver area, including Commerce City, and is driven primarily by supply and demand. Since July 1, 2016, Commerce City's population grew by 4.35% to an estimated 57,256. Between 2010 and 2016 Commerce City's population increased by 19.5% (ACS-QuickFacts). Despite this intense population growth, the addition of new housing, and especially "middle housing" units have not kept pace. The result is a scarcity of housing which has, in turn, driven up prices.

Based on the City's 2017 3rd Quarter Economic Indicators, homes sales are averaging \$331,946 for detached homes and \$250,965 for attached homes. These prices are up 10.6% and 15.7% respectively.

Based on Commerce City's average household size of 3.15 people, the City's 57,256 residents would require approximately 18,176 housing units, however, between 2012-2016, the ACS estimates the figure was 15,101, a shortfall of over 3,075 units or 17.0%. When you add the hidden estimated population of 2,085 undocumented immigrants, another 690 homes are needed for a total of 3,765 units. Fortunately, a 216-unit affordable apartment complex will be opening in 2018.

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

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

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

However, development-related costs (land costs, labor, materials, tap fees, impact fees, and the costs of assuaging NIMBY sentiments particularly directed at

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

multifamily housing) were determined to have a significant negative effect on development of new housing.

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

Stakeholders interviewed in the course of preparing this plan also cited Colorado's construction defect laws as contributing to the lack of affordable multifamily housing supply. The well-intentioned state laws were designed to protect homebuyers from defective housing construction. But by allowing class action lawsuits in perpetuity from as few as two homeowners against a builder or other construction industry professional, the industry cannot secure reasonable insurance. It has all but stopped producing multifamily housing due to the high risk of litigation and the associated costs of insurance against such legal claims. Where multifamily housing is being constructed, it typically must exceed a \$400,000 per unit price point in order to cover the builder's insurance costs.

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

A comparison of the 2010-2015 DMA's growth rate is below. A full listing of the 50 most populous city growth rates are in the article cited below⁶:

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

Table 10 – National Population Growth Rates

⁶ **Chart: Denver tops U.S. city population gain rate in 2015**

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

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

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

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

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

- **Housing Needs Assessment and Housing Plan** – in 2017 the City and CCHA launched a joint study. The plan will identify various housing needs for different housing types across the City. Additionally, the plan will make recommendations to both the CCHA and City on ways to address housing needs across the community.
- **Rehabilitated Homes** (Citywide Policy HN 1.1) The preservation of existing housing stock (rental and ownership housing) and its rehabilitation helps prevent loss due to deterioration. This ensures homes will remain available to working families. Rehabilitated homes should be evaluated for environmental hazards. Identified hazards (e.g., lead-based paint, friable asbestos) will be mitigated before houses are re-occupied.
- **Variety of Housing Types and Mixed-Uses within Neighborhoods** (Citywide Policy HN 2.1) Encourage new neighborhoods containing a mix of housing types, ranging from single-family detached, attached, townhomes, apartments, lofts, and housing for special needs (e.g., seniors). Site plans should include a mix of lot sizes, development densities, as well as housing types and styles, with high-density and multi-family housing near collector and arterial streets, transit, and services.
- **Neighborhoods for Mixed Incomes** (Citywide Policy HN 3.1) New neighborhoods should contain a range of housing priced at different points for mixed incomes, to achieve overall diversity.
- **Affordable Housing Options Maintained** (Citywide Policy HN 3.3) Continue to support existing affordable housing options, partnerships, and programs to address the continued maintenance of the City's affordable stock, including existing maintained mobile home parks in the Historic City; multi-family housing; and affordable, small, single-family homes. Future

affordable housing will be located throughout the community near jobs and services, so pockets of low-income housing do not occur.

Discussion:

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

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

The plan prioritizes affordable housing accessible to transit.

Detailed strategies, goals, and outcome indicators for each of the affordable housing-focused policies listed above are contained in the City's C3 Vision Plan. In 2019, the City will be hiring a consulting firm to update the City's Comprehensive Plan.

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

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

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

AP-85 Other Actions – 91.220(k)

Introduction:

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

Actions planned to address obstacles to meeting underserved needs

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

1. facilitate the development of area social service collaborations to help coordinate the work of social service organizations within the City;
2. disseminate news and information to area organizations and City residents;
3. spearhead community-wide solutions to local needs;
4. spearhead coordinated solutions to local needs; and
5. reduce service redundancy within City departments and area social service organizations.

Actions planned to foster and maintain affordable housing

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

1. Provide CDBG funding to support homeowner rehabilitation, repair, accessibility, and weatherization programs;
2. Seek out non-profit organizations and other government programs for funding, consultation, and cooperation to improve housing units occupied by LMI households, within the City;
3. Seek out non-profit organizations, area businesses, and other government programs for funding, consultation, and cooperation to improve neighborhoods and foster economic development, to increase the economic opportunities and standing of the City's residents;
4. Increase the supply of affordable housing units through targeted redevelopment; and
5. Gather and disseminate information on area resources to help residents meet their financial needs and unanticipated costs such as medical visits.

Actions planned to reduce lead-based paint hazards

As part of the City's Minor Home Repair Program, renovated properties which contain lead-based paint will be identified and addressed in accordance to the Residential Lead-Based Point Hazard Reduction Act of 1992, and/or Title X, Sections 1012 and 1013, of the Housing and Community Development Act of 1992, related regulation of the EPA and OHSA, and Regulation No. 19 of the Colorado Air Quality Control Commission.

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

The City's CDBG Office will review the actions taken by the hired agencies and ensure supporting documentation is in place for the compliance with the Lead-Safe Housing Rule Requirements as identified in 24 Code of Federal Regulations Part 35.

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

Actions planned to reduce the number of poverty-level families

ACS estimates the City's 2016 poverty level is 13.4%. Out of the City's 14 Census Tracts, six of them have LMI percentages ranging between 50.72% through 98.07%. All six of these tracts are located in the Target Area.

The City will continue its identification and development of areas with: older homes in need of significant repairs, concentrated racial and ethnic areas, and lower income families. Most of these areas are within the Target Area and the City will continue to allocate the majority of the CDBG funding there.

This year, the City will promote job training, employment services, small business development and technical assistance, through partnerships with local colleges, non-profit organizations, financial institutions, local trade schools, chambers of commerce, faith-based organizations, incubators, and business development centers.

Actions planned to develop institutional structure

The dissemination of area resource materials and the reformation of the Community Resource Network (CRN) are helping to overcome gaps in services and reduce unnecessary service duplications. The CRN resumed its presence in the community on June 28, 2017 at the City's Recreation Center, co-hosted by the City's CDBG Office, Access Housing, Kids First, and Tri-County Health. The City will continue to co-facilitate this organization throughout the 2018 AAP timeline.

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

guides the AAP process providing expertise, insight and experience within the community. This is the City third year in preparing the AAP to fund specific activities with CDBG funding. Each year the CDBG Team works to meet the needs of City residents, fill any institutional gaps, and to provide citywide interdepartmental cooperation and guidance.

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

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

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

1. Continuing the Community Resource Network for the Adams County Area to network with area non-profits, governmental agencies, faith-based organizations, financial, business, volunteer groups, etc. serving the Commerce City area. At these meetings, each organization can provide written materials, meet other organizations, network, and learn of existing services.
2. Coordinating and communicating with agencies outside of the CRN to identify needs and foster solutions within the community.
3. Offering technical assistance to agencies on available funding sources, associated timelines, applicable requirements, and the most impactful uses of funds.
4. Participating in regional efforts and meetings with public and private housing, educational entities, economic development organizations, social service agencies, and other governments.
5. Providing pre-application information for property owners considering the MHRP, PAT and AC WX programs as described under the Project Section.
6. Provide information on all public service activities funded by the 2018 AAP including applications, amounts, timelines, and requirements.
7. Continue to attend training opportunities provided by HUD.

8. Continue membership and participation in the state-wide CDBG User Group.

Program Specific Requirements

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

Introduction:

The City will work diligently to ensure the CDBG program adheres to the numerous statutory and regulatory requirements set for the program. Commerce City is a relatively new entitlement community and has no program income on hand.

The estimated percentage of CDBG funds used for activities benefiting persons of low and moderate income over the one-year period covered by this 2018 Annual Action Plan is 70%.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities \$0
2. The estimated percentage of CDBG funds 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:

70% during 2018 AAP (October 1, 2018 – September 30, 2019)

Discussion:

As Commerce City begins its third year as an entitlement community, no program income has been produced. Additionally, there are no outstanding Section 108 loan guarantees, grant funds returned to its line of credit, or float-funded activities.

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

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