



City of Commerce City,
Colorado

Community Development Block Grant

2019 Consolidated Annual Performance
and Evaluation Report (CAPER)

Prepared by the
Department of Community Development's
Community Development Block Grant Office and Civitas, LLC

Table of Contents

CR-05 - Goals and Outcomes	3
CR-10 - Racial and Ethnic composition of families assisted	9
CR-15 - Resources and Investments 91.520(a)	10
CR-20 - Affordable Housing 91.520(b)	13
CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)	16
CR-30 - Public Housing 91.220(h); 91.320(j)	19
CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)	20
CR-40 - Monitoring 91.220 and 91.230	23
CR-45 - CDBG 91.520(c)	25

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

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

The City of Commerce City is a US Department of Housing and Urban Development (HUD) entitlement jurisdiction receiving an annual allocation of Community Development Block Grant (CDBG) program funds. These funds help the City address the housing, community, and economic development objectives outlined by HUD, which include, but are not limited to: furthering fair housing, the development of affordable housing, residential housing rehab, public facility and infrastructure improvements, homelessness prevention, and vital services for low- to moderate-income (LMI) and special needs populations. The City has successfully implemented activities that further its goals addressing the priority needs identified in the City's Consolidated Plan and Annual Action Plan. These accomplishments are highlighted below.

Minor Home Repair: In PY 2019 the City assisted 20 LMI owner-occupied households with single-family housing rehab activities through the Minor Home Repair Program (MHRP). There were 10 LMI senior or disabled owner-occupied households assisted through the Paint-a-Thon (PAT) program with Brother Redevelopment. There were also 11 LMI households assisted with energy efficiency improvements and combustion appliance repairs and replacements in the Arapahoe County Weatherization Program.

Public Services and Homeless Prevention: The City and its partners assisted 112 LMI persons with vital public services that helped to improve their quality of life. The Commerce City Police Department's Domestic Violence Victim Support Program (DVV) also helped 46 households consisting of 154 victims of domestic violence avoid homelessness.

Sidewalk Construction: In PY 2019, the City continued to install new stretches of sidewalks in the Core City target area. These development activities were made in conjunction with the City Public Works Department and had an areawide benefit of 5,650 LMI persons in Low/Mod census tracts.

Economic Development: In PY 2019, the City completed renovations to the Small Business Resource Center (SBRC). Renovations also included technology upgrades for internet access and presentation equipment. The purpose was to provide modern facilities for organizations that support local start-ups and small businesses. Additionally, two other economic development activities were completed – the SBRC Micro Enterprise Staff Assistance and the SBRC Staff Technical Assistance to for Profit Businesses. The Micro Enterprise program assisted eleven (11) individuals to start-up or expand their businesses. The Technical Assistance activity assisted 138 small businesses to seek available grant and loan funding during COVID-19.

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

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

Goal	Category	Source	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration and Planning	Non-Housing Community Development	CDBG	Other	Other	1	1	100%	1	1	100.00%
Affirmatively Further Fair Housing Choice	Fair Housing	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	80	80	100.00%			
Business Development		CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	200	140	70.0%	30	11	36.7%
Technical Assistance for Profit Businesses		CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	-	-	-	100	138	138.00%

Construction of ADA Ramps	Non-Housing Community Development	CDBG	Other	Other	10	6	60.00%	6	6	100%
Demolition and Clearance	Non-Housing Community Development	CDBG	Buildings Demolished	Buildings	2	0	0.00%			
Drainage Improvements	Non-Housing Community Development	CDBG	Other	Other	1	0	0.00%			
Job Training		CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	40	0	0.00%			
Local Bus Stop Improvements	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	300	0	0.00%			
Minor Home Repair	Affordable Housing	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	12	69	575.00%	42	41	97.62%

Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	250	380	152.00%	95	112	117.89%
Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	120	0	0.00%			
Public Services	Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG	Homelessness Prevention	Persons Assisted	129	154	119.38%	129 (2019 AAP with increased funds)	154	119%
Revolving Loan Fund		CDBG	Businesses assisted	Businesses Assisted	8	9	112.50%	8	9	112.5%
Sidewalk Construction and Repair	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	3985	5650	141.78%			

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

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

Below is a list of priorities as identified in the City's Consolidated Plan and how funds were expended (amount and percent of total funds) in PY2019 as well as a summary of activities that addressed the need.

Neighborhood Revitalization (High Priority): \$ (%)

The sidewalk and ADA ramp installation projects all specifically address this high priority. In PY 2019, the City continued to install new stretches of sidewalks in the Core City target area. These development activities were made in conjunction with the City Public Works Department and had an areawide benefit of 5,650 LMI persons in the Low/Mod target area.

Preserve & Expand Affordable Housing (High Priority): \$ (%)

In PY 2019 the City assisted 20 LMI owner-occupied households with housing rehab activities through the Minor Home Repair Program (MHRP). Repairs through the MHRP included plumbing, electrical, foundational, furnace, and hot water replacements, roof replacements, and several structural repairs. There were also 10 LMI senior or disabled owner-occupied households assisted through the Paint-a-Thon (PAT) program with Brother Redevelopment. Activities with PAT included exterior painting, disposable cleanups, lead-based paint hazard testing, accessibility improvements, and yard cleanup. There were also 11 LMI households assisted with energy efficiency improvements and combustion appliance repairs and replacements in the Arapahoe County Weatherization Program. Activities included but were not limited to new furnaces, refrigerators, insulation with vapor barriers, carbon monoxide detectors, window, and door weatherization, and related energy-efficient appliance repair or replacements.

Public Services for LMI & Special Needs Populations (High Priority): \$ (%)

The City and its partners assisted 112 LMI persons with vital public services that helped to improve their quality of life. Services included youth employment training with Groundwork Denver, services for persons with a vision difficulty through the Audio Information Network, and recreational activity scholarships. The Commerce City Police Department's Domestic Violence Victim Support Program (DVV) also helped 46 households consisting of 154 victims of domestic violence avoid homelessness.

Economic Development (High Priority): \$ (%)

In PY2019, the City completed renovations to the Small Business Resource Center. Renovations also included technology upgrades for internet access and presentation equipment. The purpose was to provide modern facilities for organizations that support local start-ups and small businesses. There were

a total of 132 small businesses assisted in PY2019. Eleven (11) micro businesses and individuals were assisted with their businesses and 138 existing businesses were assisted with COVID-19 relief options and funding programs.

Affirmatively Further Fair Housing Choice & Administration (High Priority): \$ (%)

Throughout PY2019 the City disseminated fair housing information through brochures, pamphlets, and presentations to City residents. Fair housing is also an integral part of the information handed out to households assisted with HRP programs and the DVV support program. Fair housing efforts are paid for from the City's CDBG Administrative budget. Along with the duties of administering the CDBG program, staff also participated in training and ongoing learning of HUD programs and guidance.

CR-10 - Racial and Ethnic composition of families assisted

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

	CDBG
White	223
Black or African American	36
Asian	1
American Indian or American Native	1
Native Hawaiian or Other Pacific Islander	0
Total	261
Hispanic	166
Not Hispanic	95

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

Narrative

The table above does not include a category for people that identify as “other” or “multiple races” nor does it include racial/ethnic data for activities that had an area-wide benefit, therefore the above table does not necessarily match the number of people served by the CDBG program.

Approximately 14% of CDBG funding went towards assisting Black or African Americans. All other minority races accounted for less than 1%. For persons who identified as Hispanic, over 63% of CDBG funding went towards assisting the ethnic group.

According to the most recent 2015-2019 ACS 5-Year Estimates, 81.6% of the population was White, followed by 4.4% for Blacks, 2.0% for Asians, and 0.9% for American Indian and Alaska Natives (AIAN). Persons who identified ethnically as Hispanic were 49.2% of the citywide population. It should be noted that the Asian and AIAN population groups were small, however, except for the two race groups, the City significantly assisted minority groups with CDBG programs.

Needs Assessment

The Needs Assessment in the City’s Consolidated Plan assesses if any racial and ethnic group by income category has a disproportionate need in the area with regards to housing problems, severe housing problems, and cost burden. Households with housing problems are those that reside in units lacking complete kitchen and plumbing facilities as well as overcrowding (more than one person per room) and cost burden (spending 30% or more of income on housing per month). Households with “severe housing problems” are those that reside in units lacking complete kitchen and plumbing facilities however they are in severely overcrowded homes (more than 1.5 people per room) and are severely cost-burdened (spending 50% or more of income on housing per month).

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

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

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	428,484	741,010

Table 3 - Resources Made Available

Narrative

The table above details the resources made available during PY 2019 as well as funds expended during the program year.

In PY 2019 the City had a total of \$428,484 in resources available for its housing and community development projects in the CDBG program. The City expended \$741,010, which included prior year funds. Expenditures went towards housing rehab and energy efficiency improvement activities, homeless prevention through the DVV program, public service activities, street construction activities, economic development at the Small Business Resource Center, and program admin. There was no program income generated or spent in the program year. Details of expenditures and a summary of activities are listed in section CR-05.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide	20	15	Some home repair projects and assisted businesses were located outside of the TA.
Core City	80	85	Except for a few Home Repair Programs and businesses assisted, the large majority of funding was targeted and spent in the target area.

Table 4 – Identify the geographic distribution and location of investments

Narrative

Commerce City has identified the Core City (also known as the Historic City) as a target area. The target area is south of 96th Avenue, East of Hwy 2, and Quebec Street, then south and west to the City boundaries. This section of the City comprises the highest percentage of LMI individuals, minorities, and older homes in need of rehabilitation. The target area contains Census Tracts of 87.05, 87.06, 87.09, 88.01, 99.02, and 89.01.

The Minor Home Repair programs are targeted towards the Core City with rehab activities and took place primarily within the target area. The DVV program, due to privacy protections for the victims cannot be tracked by location. Some home repair projects, public services, and assisted businesses were located outside of the Target Area.

Leveraging

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

The CDBG program does not require funding matches from other sources, however, the City encourages leveraging from itself, its Subrecipients, other forms of government, community partners, businesses, and residents.

PY 2019 was augmented by several City resources and community partners. All of the entities below gave either their staff time, knowledge, skill, facilities for meetings, and materials for distribution at events to help implement the City's CDBG program:

Organizations and agencies:

1. Adelante
2. Arapahoe County Weatherization's WAP Program
3. Brothers Redevelopment Inc. (MHRP and PAT)
4. Colorado Minority Business Organization
5. Commerce City Housing Authority
6. Commerce City Recreation Centers
7. Commerce City Senior Center
8. Community Resource Network
9. Cultivando
10. Groundwork Denver

11. Housing and Urban Development
12. Kids First Health Care
13. South Adams County Fire District
14. Urban Land Institute

City Departments:

1. City Attorney
2. City Council
3. City Manager - Communications
4. Community Development
5. Economic Development
6. Finance
7. Human Resources
8. Information Technology
9. Neighborhood Services
10. Parks, Recreation & Golf
11. Police Department
12. Public Works Department

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

Several segments of City-owned property or easements were utilized for the construction of sidewalks. The Small Business Resource Center is owned by the city. It was renovated to assist small businesses to receive technical assistance and resources. No other publicly owned land or property located within the jurisdiction was used to address the goals in the City.

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	30	41
Number of Special-Needs households to be provided affordable housing units	12	46
Total	42	87

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	46
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	42	41
Number of households supported through Acquisition of Existing Units	0	0
Total	42	87

Table 6 – Number of Households Supported

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

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

The Paint-a-Thon program missed its goal by one home. This is primarily due to the loss of volunteers because of the pandemic and the increased time and expense of implementing the new lead-based paint regulations.

Increases in funding for the Domestic Violence Victim Support (DVV) and the Home Repair Program (HRP) increased the numbers to be completed in the program year. The Minor Home Repair Program (MHRP) saw a complete stop in activity for three months during the beginning of the pandemic. Despite these obstacles, the goals were met.

The Arapahoe County Weatherization Program did not meet its annual goal. This is due to the delay in the Subrecipient Agreement's execution and the pandemic.

Discuss how these outcomes will impact future annual action plans.

Homeowner housing rehab continues to be a great need in Commerce City. Future Annual Action Plans will utilize CDBG funds to fund the Minor Home Repair Program as well as Paint-a-Thon and weatherization activities. As well, homeless prevention of LMI and special needs households is also a priority. The City will also continue to fund the DVV program to assist households with victims of domestic violence with emergency assistance.

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

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

Number of Households Served	CDBG Actual
Extremely Low-income	12
Low-income	61
Moderate-income	14
Total	87

Table 7 – Number of Households Served

Narrative Information

The City assisted a total of 87 LMI households with affordable housing activities (41 with housing rehab/energy efficiency improvements and 46 with mortgage/rental/utility payment assistance).

For the 41 households reporting income through residential housing rehab programs (MHRP, PAT, and Arapahoe County Weatherization), 12 were extremely low-income, 15 were low-income and 14 were moderate-income. The MHRP program reported that among the 20 assisted through its activities 18 were elderly residents and 9 of those had a disability. The ten households assisted through PAT were all elderly. All households assisted through the rehab programs were homeowners.

The 46 households served through the DVV program were assisted with mortgage, rent, temporary housing, and/or utility assistance. All the households assisted were low income. Finally, all households assisted in the DVV program were victims of domestic violence and their homeowner and renter status was suppressed for privacy and safety.

Worst case needs are extremely low-income households in need of housing assistance to avoid homelessness. In PY2019 the City assisted 12 extremely low-income households, all in the housing rehab programs. Residential housing rehab activities help extremely low-income households to avoid housing

conditions that may lead to homelessness. While not extremely low-income households, the DVV program assisted 46 households with victims of domestic violence with emergency assistance to avoid homelessness.

To address persons with a disability, the MHRP program assisted 9 households with a disability with minor home repairs, accessibility improvements, and energy efficiency. The PAT program targets assistance to seniors and persons with a disability with clean-up, painting, and accessibility improvements.

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

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

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

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

In PY 2019, the DVV program prevented homelessness for 46 households, totaling 154 residents. These residents had just reported domestic violence to the City Police Department and needed mortgage, rent, or emergency hotel stays; electrical; gas; and/or water payment assistance to keep a roof over their heads and/or escape their abuser.

Addressing the emergency shelter and transitional housing needs of homeless persons

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

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

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

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

The City and the Commerce City Housing Authority (CCHA) regularly work with local partners to develop

additional affordable housing units with many targeting extremely low-income households that are at risk of homelessness.

The PY 2019 CDBG Office's outreach efforts to coordinate housing/homeless services and related opportunities included:

1. Access Housing
2. Adams County 14 School District
3. Adams County Aging Network
4. Adams County Community Development
5. Almost Home
6. Arapahoe County Weatherization
7. ARC of Adams County
8. Audio Information Network of Colorado
9. Aurora Community Connection
10. Aurora Network
11. Brother's Redevelopment
12. Center for People with Disabilities
13. City of Aurora Community Development
14. City of Thornton – Community Connections
15. City of Westminster
16. Colorado Access
17. Colorado Cross-Disability Coalition
18. Colorado Housing Connects
19. Commerce City Economic Development Department
20. Commerce City Housing Authority
21. Commerce City Neighborhood Services
22. Commerce City Police Department – YHOP and DVV
23. Commerce City Senior Center
24. Commerce City Senior Commission
25. Commerce City Senior Luncheon
26. Commerce City Seniors
27. Commerce City Youth Commission
28. Community Advocate Council
29. Community Choice Credit Union
30. Community First
31. Community Reach Center
32. Community Resource Gathering – Thornton
33. Community Resource Network – Connecting for a Better Community
34. Community Uplift Partnerships
35. Conservation Colorado
36. Cultivando

37. Denver Metro Fair Housing Center
38. Families First
39. Family Tree
40. Groundworks Denver
41. Growing Home
42. Habitat for Humanity
43. HLF – Elder Law and Estate Planning
44. Innovage
45. Kids First Health Care
46. Let Your Light Shine
47. Northern Denver Metro Small Business Development Center
48. Project Angel Heart
49. Quality Community Fund
50. Spectra Centers, Inc.
51. Star Girlz
52. The Senior Hub
53. Tri-County Health Department

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

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

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

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

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

Actions taken to address the needs of public housing

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

However, the City will refer to the Commerce City Housing Authority (CCHA) for the public housing needs of city residents. CCHA has an ownership interest in 242 affordable housing units. They also manage a Section 8 voucher program with 130 active vouchers, and with over 250 people on the Section 8 voucher waitlist.

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

The Commerce City Housing Authority (CCHA) provides a *Down Payment and Closing Cost Assistance* loan program for income-qualified, first-time homebuyers, for homes purchased in Commerce City. During PY2019, no potential home buyers were assisted with this program, rather they are referred to Metro Mortgage Plus program.

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

Actions taken to provide assistance to troubled PHAs

There are no troubled PHAs in Commerce City.

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

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

The City's Neighborhood Services (NS) leadership and staff took an active role in helping residents live safer and healthier. Just before PY2019, NS collaborated with the CDBG Office and went door-to-door to 50 homes exhibiting possible repair needs and delivered bags containing valuable information on the Minor Home Repair Program (MHRP) and other service programs for city residents. Applications were received in PY2019 as a result of this outreach. Increased communication between NS and the residents is improving and the program's goal is to see the code enforcement violations reduced.

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

And as previously described in detail, the City continues to support the MHRP program to finance the correction of building code violations and the rehabilitation's related permit and fee costs.

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

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

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

Each Housing Repair Program (HRP) applicant receives a *Protect Your Family from Lead in Your Home* booklet. This booklet is also available on the CDBG page of the City's website. In accordance with 24 CFR 570.608 regulations, each of the PY 2019 rehabilitated homes complied with lead-based paint regulations. The Paint-a-Thon program did detect lead on home exteriors. When this occurred, a qualified third-party consulting firm was brought in to follow the LBP regulations.

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

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

the value of housing.

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

As mention earlier, the City funded the City Police Department's DVV also helped 46 households consisting of 154 victims of domestic violence. This assistance kept the individuals and families in safe housing and helped them to avoid homelessness.

The Small Business Resource Center (SBRC) assists residents seeking to start-up a business and those seeking jobs and job training. The SBRC is designed to help retain and increase jobs within the City. There were a total of 138 small businesses assisted in PY 2019. Eleven (11) individuals were assisted with technical assistance to start-up their businesses and 132 existing businesses were assisted with COVID-19 relief options and funding opportunities.

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

The CDBG Team was established to review and rank all CDBG applications; and make recommendations for funding to the City Council. The CDBG Team is comprised of the following Commerce City Departments and Divisions:

1. City Attorney
2. City Manager
3. City Planning
4. Communications
5. Community Development
6. Economic Development
7. Finance
8. Information Technology
9. Neighborhood Services
10. Parks and Recreation
11. Police Department
12. Public Works
13. Commerce City Housing Authority

The CDBG Team provides comprehensive inter-departmental input into each year's funding award process and the formation of the Annual Action Plan. The CDBG Team works to avoid internal institutional gaps while providing citywide interdepartmental cooperation and guidance. This compilation of talent, community knowledge, and professional expertise streamline the flow of information from the City departments into the CDBG Program. Cooperation and referrals between the HUD staff, Dept. of Labor, and the National Community Development Association (NCDA), Adams County, Arapahoe County,

Jefferson County, CDBG User Group, and neighboring cities were all actively pursued by the CDBG Office. Attendance in training, seminars, meetings, group e-mails, and other personal interactions was accomplished with each organization mentioned above.

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

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

During PY 2019 the City was limited in its ability to participate in regional and local outreach events due to the COVID-19 pandemic, however, early in PY 2019 the CDBG Office participated in regional events, fairs, festivals, health fairs, and attended regular meetings with public and private housing, educational entities, economic development organizations, social service agencies, and other consortiums.

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

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

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

Actions to Address Impediments to Affordable and Fair Housing Choice

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

In PY 2019 the City assisted 20 LMI owner-occupied households with housing rehab activities through the Minor Home Repair Program (MHRP). There were 10 LMI senior or disabled owner-occupied households assisted through the Paint-a-Thon (PAT) program with exterior painting, disposable cleanups, lead-based

paint hazard testing, accessibility improvements, and yard cleanup. There were also 11 LMI households assisted with energy efficiency improvements and combustion appliance repairs and replacements.

The City also worked to assist LMI residents in the city with disparate access to opportunity. The City assisted the Small Business Resource Center (SBRC) which works to help LMI residents seeking to start-up a business and also those seeking jobs and job training.

CR-40 - Monitoring 91.220 and 91.230

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

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

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

1. Continuing professional training for the CDBG Coordinator, CCHA Manager, and the FD representative. To learn alternative accounting and tracking methods the CDBG Coordinator and FD will meet with neighboring CDBG communities.
2. Continuing to cross-train City staff on CDBG administrative responsibilities.
3. Exploring the possibility of procuring additional CDBG staff time
4. Expanding technical training and personal attention given to Subrecipients.
5. Providing desktop monitoring visits for Subrecipients with each reimbursement request and/or quarterly report submitted. This includes all cross-cutting regulations such as labor, relocation, environmental, and fair housing, and equal opportunity.
6. When the pandemic allows, to perform informal on-site visits to review files and procedures, listen to the Subrecipient's ideas and concerns, and amend/accommodate the project as needed.
7. When the pandemic allows, to performing formal on-site monitoring visits with each Subrecipient.
8. Providing follow-up, as needed, to all Subrecipients in either written or verbal format, as appropriate and required.
9. Utilizing HUD provided checklists and reporting documents and encourage the same from all of

the Subrecipients.

10. Continuing to work with the City's Legal Department on the procurement and hiring of consultants and contractors.
11. Entering information regularly into the Integrated Information Disbursement System (IDIS).
12. Improve the Subrecipient's reporting forms.
13. Continue to increase the frequency of drawdowns early in the project year to easily comply with HUD's annual Timeliness Test.
14. Meeting with organizations planning to apply for funding, to encourage a wise approach to the project and reduce application, administrative and cross-cutting requirements.

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

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

The City's Citizen Participation Plan outlines the CAPER and related performance reports shall be posted for public comment for not less than 15 days before the Public Hearing of the CAPER for adaption by the City Council on March 15, 2021. The public notice was placed in the Sentinel on February 23, 2021. Please see the attached affidavit of publication for the Commerce City Sentinel. It was also noticed in Spanish in La Prensa on February 26, 2021.

The draft PY 2019 CAPER was posted on the City's website: <http://www.c3gov.com/cdbg> from February 23, 2021, through March 15, 2021.

A formal public notice of the CAPER's public hearing with the City Council was published in the City's official newspaper, the Sentinel, and in the Spanish newspaper La Prensa. Notice of the CAPER was in English and Spanish in the Commerce City *Connected* newsletter which is mailed to every household in the City. The City's social media accounts were also employed.

CR-45 - CDBG 91.520(c)

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

There were no changes to the original priorities and goals of the Consolidated Plan, however, within the PY 2019 Annual Action Plan (AAP), project outcomes were amended due to the COVID-19 pandemic. CDBG funds of \$30,000 were reallocated to the DVV program from sidewalk construction and scholarships to provide for the increased need for temporary financial support for housing and utilities to domestic violence victims and their dependents.

Commerce City also substantially amended its PY 2019 AAP to add assistance to residents affected by the COVID-19 pandemic. This amendment was named the CARES Act Amendment. In response to the pandemic, the federal CARES act was signed into law to assist communities in their efforts to prevent, prepare for and respond to the coronavirus. Federal funds were awarded in three rounds, of which the City as a CDBG-CV recipient was awarded funds in Round 1 and Round 3 of the grant allocations. The CARES Act Amendment outlined the use of CDBG-CV funds towards activities providing rent or mortgage assistance to LMI residents impacted by COVID-19.

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

No