



City of Commerce City, Colorado

Community Development Block Grant

PY 2024 Consolidated Annual Performance and Evaluation Report (CAPER)

DRAFT

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

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

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

The City of Commerce City (C3) is designated as an entitlement jurisdiction by the U.S. Department of Housing and Urban Development (HUD), which receives an annual allocation of Community Development Block Grant (CDBG) funds. These funds support the City in addressing housing and community development goals as outlined by HUD, primarily targeting low- to moderate-income (LMI) individuals and special needs populations. The City has successfully implemented activities that align with its objectives, focusing on the priority needs identified in the 2020-2024 Consolidated Plan and the 2024 Annual Action Plan (AAP). The accomplishments for PY 2024 are highlighted below.

Improve Public Infrastructure: The City had a goal to assist 12,345 persons living in low/mod areas in Commerce City. The low/mod areas are determined by HUD LMISD block group tract data. These activities were not started completed yet as the City had to make a substantial amendment to the 2024 AAP to program these activities.

Public Services and Homeless Prevention: The City assisted 1,856 LMI persons with vital public services that helped to improve their quality of life. These benefits were associated with youth services at A Precious Child (#67).

Minor Home Repair: The City didn't have any goals set up in the 2024 AAP, however there were several activities that were started in prior years and finally completed in the program year. These include 26 LMI owner-occupied households assisted with housing rehab activities through the Minor Home Repair Program (#53) (13 LMI households) and the Brothers Redevelopment Paint-a-Thon program (#65) (13 LMI households). MHRP activities include minor repairs to homeowner housing with structural issues, vital appliances, and units with interior/exterior maintenance needs. The Paint-a-Thon program provides exterior residential painting for seniors and disabled residents. Among all the households assisted, 19 households were elderly and 6 had a member with a disability.

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
Improve Connectivity & Access	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	100	0	0.00%			
Improve Infrastructure Appearance, Health & Safety	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	300	0	0.00%			
Improve Public Infrastructure	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	75000	12375	16.50%	12345	0	0.00%
Neighborhood Appearance, Health, & Safety	Non-Housing Community Development	CDBG	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	500	0	0.00%			
Planning and Administration	Administration & Planning	CDBG	Other	Other	1	1	100.00%	1	1	100.00%

Promote and Provide Homelessness Solutions	Homeless	CDBG	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	200	0	0.00%			
Promote Fair Housing and Equal Opportunity	Non-Housing Community Development	CDBG	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	40	96	240.00%			
Provide Financial Support to For-Profit Businesses	Non-Housing Community Development	CDBG	Businesses assisted	Businesses Assisted	10	0	0.00%			
Provide for Workforce Development	Non-Housing Community Development	CDBG	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	100	0	0.00%			
Provide Services & Resources for LMI Residents	Non-Homeless Special Needs	CDBG	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	250	7211	2,884.40%	300	1856	618.67%
Provide Services & Resources for LMI Residents	Non-Homeless Special Needs	CDBG	Homeless Person Overnight Shelter	Persons Assisted	0	0	0.00%			
Provide Services & Resources for LMI Residents	Non-Homeless Special Needs	CDBG	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	0.00%			

Provide, Preserve, and Support Affordable Housing	Affordable Housing	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	75	78	104.00%	0	26	100.00%
Response and Recovery to Community Emergencies	Emergency Response	CDBG	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	100	0	0.00%			
Section 108 Loan Program	Non-Housing Community Development	Section 108	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	12345	0	0.00%			
Support Special Needs Populations	Non-Homeless Special Needs	CDBG	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	50	0	0.00%			

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

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

In PY 2024 the City focused on affordable housing preservation and public services for LMI and special needs groups. Housing rehab activities were conducted through two programs, the MHRP and Paint-a-Thon programs. The MHRP included repairs to plumbing, electrical, foundational, furnace, and hot water replacements, roof replacements, and other structural repairs. The Paint-a-Thon program provides exterior residential painting for seniors and disabled residents. The City also planned to make improvements to street and sidewalk improvements. These activities were not completed yet as City had to make a substantial amendment to the 2024 AAP to program these activities.

See below for a list of CDBG (EN) expenditures by priority in PY 2024:

Public Services: \$25,000.00 (9.0%)

Housing Rehab (MHRP & Paint-a-Thon): \$161,080.77 (57.9%)

Administration and Planning: \$91,919.27 (33.1%)

TOTAL CDBG (EN): \$278,000.04

Please note, the City follows strict grant based accounting guidelines. For each FY CDBG grant allocation, there is a maximum spending cap of 15% for public services and 20% for administrative costs. The City ensures it will not exceed expenditures of the grant caps for the FY grant awards. As programmed funds are spent down, the final expenditures will meet the budgeted allocations which meet these grant requirements. The City's FY grant budgets have been approved by HUD during the AAP review process.

PY 2024 Goals to Accomplishments Comparison

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

Provide Services & Resources for LMI Residents: The City had a goal to assist 300 persons, and assisted 1,856 LMI persons. This activity was associated with youth services at A Precious Child (#67).

Improve Public Infrastructure: The City had a goal to assist 12,345 persons living in low/mod areas of the City with public improvements, however at this time no activities are reported. These activities were delayed as the City had to make a substantial amendment to the 2024 AAP to program

these activities.

Provide, Preserve, and Support Affordable Housing: The City did not establish any new goals for PY 2024, however there were two activities that were started in previous years that were finally completed in PY 2024. These were the Minor Home Repair Program and the Paint-a-Thon which assisted a total of 26 LMI households.

CDBG-CV

As of PY 2024 the City has largely completed the CDBG-CV program. With these funds the City assisted LMI residents impacted by the pandemic with rent and mortgage assistance programs. The programs funded were facilitated by Almost Home and Access Housing, which assisted a total of 366 LMI households. Emergency assistance for rent and mortgage payments helped them avoid homelessness in this time of crisis. There is a balance of \$752.10 remaining which will be used to help close out the program. The City expects to spend the remainder of these funds in the next program year to close out the CV grant.

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	1,535
Black or African American	84
Asian	39
American Indian or American Native	56
Native Hawaiian or Other Pacific Islander	21
Total	1,735
Hispanic	1,374
Not Hispanic	508

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

Narrative

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

According to the most recent 2019-2023 ACS 5-Year Estimates, the population of Commerce City was 64,640. An estimated 60.4% of the population identified as White, followed by 4.7% identifying as Black or African American, 2.4% as Asian, and 2.4% as American Indian and Alaska Natives (AIAN). “Some other race” were 11.3% and “Two or more races” were 18.6%. Persons who identified ethnically as Hispanic were 48.3% of the citywide population.

The table above shows 1,735 total persons reported by race; however the actual total was 1,882 persons. This was due to the reporting table in IDIS not having a category for “other multiracial” of which there were 147 persons. Of the actual total number of persons assisted with CDBG, 81.6% were White, 4.5% were Black or African American, 3.0% were American Indian or American Native, 2.1% were Asian, and 1.1% were Native Hawaiian or Other Pacific Islander. There were also 7.8% that were “Other multiracial”. Reporting by ethnicity, 73.0% of persons assisted with CDBG identified as Hispanic.

Housing 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.

Commerce City funded two housing programs, which assisted 26 LMI households in PY 2024. These programs helped with the preservation of affordable housing, and they were the Minor Home Repair Program (MHRP) and Brothers Redevelopment's (BRI) Paint-A-Thon program. Reporting by race, there were 19 White (73%), 4 Black (15%), and 3 “Other” (12%) households assisted. By ethnicity, there were 8 Hispanic households assisted (31%). Overall, except for Asian and American Indian or American Native households, the City adequately assisted minority groups with CDBG housing rehab programs. The City intends to assist all minority groups regardless of size in its programs. For more details about the City's housing programs, see the CR-20 Affordable Housing section.

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	409,823	278,000

Table 3 - Resources Made Available

Narrative

In PY 2024 the City had \$409,823 in resources available for its housing and community development projects through the annual CDBG allocation. The City expended \$278,000.04 towards housing rehab activities, public services, and admin of the program. Costs included funds that were allocated from prior years. Details of expenditures and a summary of activities are listed below.

Public Services: \$25,000.00 (9.0%)

Housing Rehab (MHRP & Paint-a-Thon): \$161,080.77 (57.9%)

Administration and Planning: \$91,919.27 (33.1%)

TOTAL CDBG (EN): \$278,000.04

Please note, the City follows strict grant-based accounting guidelines. For each FY CDBG grant allocation, there is a maximum spending cap of 15% for public services and 20% for administrative costs. The City ensures it will not spend more than the max allowable caps for public services and admin costs for the FY grant awards. As programmed funds are spent down, the final expenditures will meet the budgeted allocations for these grant requirements. The City's FY grant budgets have been approved by HUD during the AAP review process.

CDBG-CV

In response to the COVID-19 pandemic, Commerce City was allocated CDBG-CV funds in two rounds for a total of \$467,040. CDBG-CV funds were intended to help fund activities that helped to assist LMI households prevent, prepare for and respond to the coronavirus. In PY 2024 the City spent an additional \$12,970.18 on the Wellbeing Division's Homeless Assistance Program (#69), which leaves a balance of \$752.10 remaining. The PR26 CDBG-CV Financial Report has been included as confirmation in the CR-00.

FY CDBG Grant Allocation Close-Out

In PY 2024, the City did not fully expend any CDBG FY funds. When the City spends a FY grant in full, it will ensure it meets all grant requirements and does not exceed the respective administrative and public service grant caps of 20% and 15%. When a FY grant allocation has been completely spent, the City will contact its HUD office to initiate the grant close out process as noticed by CPD-22-14.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Citywide Low/Mod Eligible	100	100	All activities were citywide eligible

Table 4 – Identify the geographic distribution and location of investments**Narrative**

Commerce City does not allocate funding based solely on geographic requirements. Direct services were be targeted to LMI and special needs groups citywide by eligibility and need. The public services being funded were dispersed as needed throughout the City to benefit LMI and special population residents

Housing rehab activities are also targeted to eligible households citywide. These programs are available and accessible for the elderly and persons with a disability. Based on the income of the residents and the age of the homes most the CDBG-funded housing rehabilitation work will take place in the Core City.

Eligible activities to public facilities & infrastructure improvements will be targeting low- to moderate-income identified census tract areas in need, which have been identified as the historic part of the City, also known as the Core City, and by the tracts listed below in this section. The Core City lies south of 96th Avenue, East of Hwy 2 and Quebec Street, then south and west to the City boundaries, containing census tracts 87.05, 87.06, 87.09, 88.01, 99.02 and 89.01. This Core City may alternately be referred to as the Historic City. When public facilities and infrastructure improvements are identified, these activities must be located in a low/mod tracts. These tracts are determined by HUD Low/Mod Income Summary Data and can be found on the HUD exchange website.

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 a matching contribution; however, Commerce City encourages its departments and subrecipients to leverage additional resources. This approach expands the impact of the CDBG funds and enhances support for organizations and individuals benefiting from the City's CDBG investments. As a result, various City resources and community partners have added value to the program. The following entities contributed by providing staff time, expertise, facilities for meetings, and materials for distribution at events to help implement the City's CDBG program:

Organizations and agencies:

1. Brothers Redevelopment Inc. (MHRP and PAT)
2. Commerce City Housing Authority
3. A Precious Child

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 (Homeless Program)
11. Police Department DVV
12. Public Works Department

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

No publicly owned land or property located within the jurisdiction was used to address the goals in the City. In the program year the City focused on residential rehab and direct services to residents. While there was no use of publicly owned properties in this PY, future land purchase and easements are anticipated for drainage and transportation improvements. When these improvements are scheduled to occur, CDBG funding may be used to assist in the development or installation of those public infrastructure improvements.

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	0	26
Number of Special-Needs households to be provided affordable housing units	0	0
Total	0	26

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	0	26
Number of households supported through Acquisition of Existing Units	0	0
Total	0	26

Table 6 – Number of Households Supported

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

The City administered two housing rehab programs in PY 2024 that were programmed and planned from prior Annual Action Plans. These programs were Brothers Redevelopment Inc.'s (BRI) Minor Home Repair Program (MHRP) and Paint-A-Thon program. Beneficiaries were non-homeless and the programs were promoted for the elderly and persons with a disability.

The BRI MHRP assisted 13 LMI households. Minor home repairs include the replacement of essential appliances, exterior and interior repairs, deferred maintenance repairs in the kitchen, bathroom and minor structural damage.

The BRI Paint-a-Thon (PAT) program assisted 13 LMI households. In this program BRI staff along with volunteers work together to caulk, prime and paint the homes of qualifying Commerce City residents. When possible, this program targets seniors and disabled residents.

Discuss how these outcomes will impact future annual action plans.

Homeowner housing rehab continues to be a great need in Commerce City as evidenced by the number of applications and public input. The City will continue to use CDBG to fund the Minor Home Repair Program as well as Paint-a-Thon activities. These housing rehab programs continue to be a success in Commerce City, and future Annual Action Plans will continue to include housing rehab as a goal.

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	8
Low-income	7
Moderate-income	11
Total	26

Table 7 – Number of Households Served

Narrative Information

The City assisted a total of 26 LMI households with affordable housing activities (19 with the MHRP and 13 with the Paint-a-Thon Program).

BRI MHRP: For the 13 households reporting income through MHRP, 5 were extremely low-income, 4 were low-income, and 4 were moderate-income. MHRP households are typically elderly households. All households assisted through the rehab programs were owner-occupied.

BRI Paint-a-Thon (PAT) Program: There were 13 households reporting income through the PAT Program. One was extremely low-income, 3 were extremely low-income, 3 were low-income, and 7 were moderate-income. All the households were owner-occupied. PAT assisted households are typically elderly or have a member with a disability.

Worst Case Needs

Worst case needs are extremely low-income households in need of housing assistance to avoid homelessness. In PY 2024 the City assisted 8 extremely low-income households, all with housing rehab programs. Residential housing rehab activities help extremely low-income households to avoid housing conditions that may lead to homelessness.

To address persons with a disability, the MHRP program assisted elderly households, many of which have a disability. This assistance included minor home repairs, accessibility improvements, and energy efficiency improvements which will help them maintain their homes and remain independent. The Paint-

a-Thon also provides equal access to those with a disability. Of the 26 households assisted in PY 2024, 19 were elderly and 6 had a disability.

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

The City partners with Adams County to address homelessness. Adams County is a member of the Metro Denver Homeless Initiative (MDHI) which is the lead agency of the Continuum of Care for the greater metropolitan Denver Area. Individuals who are identified as homeless, including unsheltered homeless persons, are referred to MDHI. The City also participates in the MDHI's Point-In-Time Count, which includes outreach to people experiencing homelessness and evaluation of needs.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City continues to plan to fund facility improvements or services provided by emergency or transitional housing providers over the next five years under the priority of expanding the availability of homeless services and housing. Access Housing, Almost Home, Growing Home, and other providers will continue to provide emergency and transitional housing for people experiencing homelessness.

In PY 2024, the City's primary work to address emergency shelter and transitional housing needs of homeless persons was through the housing rehab programs that kept housing in conditions that might otherwise lead to housing instability. These programs target vulnerable groups such as the elderly and persons with a disability, and well as households that were extremely low-income (0-30% AMI).

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

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

The City does not have a discharge policy for those that may become homeless after leaving systems of

care or publicly funded institutions, however it refers these individuals to MDHI which leads the Coordinated Entry System (CES). CES helps to ensure that people at-risk or experiencing homelessness have equitable access to the housing resources they need to resolve their housing crisis. Persons in need can enter CES through one of the many access points throughout the Denver metro area, and individuals and families located in Commerce City may visit ACCESS Housing at 6978 Colorado Blvd. to be entered into CES. Individuals being discharged through the services systems above are highly recommended to seek assistance through the CES.

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

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

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

To assist individuals and families in making the transition to permanent housing, the City also joined the Adams County HOME Consortium in program year 2022 with the goal of providing additional affordable housing through the use of County HOME funds.

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

Actions taken to address the needs of public housing

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

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

The Commerce City Housing Authority (CCHA) offers a Down Payment and Closing Cost Assistance loan program for income-qualified, first-time homebuyers, for homes purchased in Commerce City. The CCHA helps qualifying first-time home buyers with down payment and closing cost assistance if they successfully complete a Colorado Housing Finance Authority-approved home buyer workshop. Financial assistance comes in the form of a second mortgage loan for down payment and all allowable closing costs up to \$10,000 at 3.5% interest rate with up to a 10 year repayment schedule. Eligibility requirements apply.

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

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

Actions taken to provide assistance to troubled PHAs

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

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

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

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

Water/Wastewater Connection Fees

The South Adams County Water and Sanitation District voted in April 2021 to approve the water and wastewater connection fees proposed in its December 2020 study. A review of late 2020 and early 2021 city council minutes did not provide actions or decisions made by the City to challenge the approved SACWSD connection fees.

Navigating NIMBYism for Multifamily Housing

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

Internal Development Review Process

Several concerns expressed by developers about the City's development review process will be addressed internally over the next year. Members of the staff, including the Chief Building Official, the CDBG Office, and the HRP programs met in May 2021 to strategize improvements to remove delays to the home rehabilitation inspection process, improve communications, and establish new affiliations.

Additionally, the City has filled many roles within the Community Development Department, including Permit Technicians, Building Inspectors, the Chief Building Official, Administrative Support, and City Planners.

Attracting and Maintaining Affordable Housing

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

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

The City's ConPlan identified the following obstacles to meeting underserved needs:

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

In order to meet the housing needs of LMI City residents, the CDBG Office continued to collaborate with the Commerce City Housing Authority (CCHA). The CDBG Office and CCHA worked together to coordinate grant and loan programs for LMI homeowners. As needed, MHRP applicants are referred to the CCHA.

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

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

To develop additional resources to address affordable housing, homelessness, and public services and facility needs, the City funded and completed a variety of projects in 2024 as listed below.

- A Precious Child (youth services)
- Minor Home Repair Program (for the elderly and persons with a disability)
- Paint-a-Thon (elderly)

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

On all CDBG-funded property rehabilitation projects, the City continues to assess whether lead-based paint is present and, if so, follows the guidelines set forth in the Residential Lead-Based Paint Hazard

Reduction Act of 1992. The City of Commerce City is committed to testing and abating lead in all pre-1978 housing units assisted with federal grant funds in any of the housing programs it implements.

Each Minor Home Repair Program (MHRP) 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 rehabilitated homes complied with lead-based paint regulations.

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

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

The City of Commerce City's anti-poverty strategy focuses on helping all low-income households improve their economic status and remain above the poverty level. All CDBG-funded programs work to directly reduce the number of poverty-level families and help them avoid the possibility of homelessness.

In the PY 2024, the City and its partners assisted LMI persons with vital public services that helped to improve their quality of life. These activities were youth prevention and enrichment services with A Precious Child.

The City will continue to work on building relationships with other programs in the area geared toward reducing poverty, providing housing stability, and supporting workforce development.

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

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

The CDBG Team provides inter-departmental input into each year's funding award process and the formation of the Annual Action Plan. The team works to avoid internal institutional gaps while providing citywide interdepartmental cooperation and guidance. This compilation of talent, community knowledge, and professional expertise streamlines the flow of information from the City departments into the CDBG Program.

The City also continues to work with existing partnerships and coalitions, including the MDHI Continuum of Care and its new involvement in the Adams County HOME Consortium. These two key partnerships will continue to allow the City to work toward meeting local housing and service needs.

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

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

The CDBG Office also participates in 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.

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

Commerce City is included within the 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. This AI was completed on November 5, 2020. 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. These included 26 LMI owner-occupied households assisted with housing rehab activities through the Minor Home Repair Program (#53) (13 LMI households) and the Brothers Redevelopment Paint-a-Thon program (#65) (13 LMI households).

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

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

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

1. Continuing professional training for the CDBG Coordinator, CCHA Manager, and the FD representative.
2. Continuing to cross-train City staff on CDBG administrative responsibilities.
3. Exploring the possibility of procuring additional CDBG staff time
4. Expanding technical training and personal attention given to Subrecipients.
5. Providing desktop monitoring visits for Subrecipients with each reimbursement request and/or quarterly report submitted. This includes all cross-cutting regulations such as labor, relocation, environmental, and fair housing, and equal opportunity.
6. When public health situations allow, 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 public health situations allow, 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.

15. Continue to work with local businesses and comply with all Section 3 requirements.

Comprehensive Planning Requirements

The comprehensive planning requirements include the development and consolidated plan process of the 5-Year ConPlan, the AAP, and CAPER. Citizen participation is a vital part of the Consolidated Plan process and the City will make sure to follow its HUD approved Citizen Participation Plan (CPP) which helps guide the City to gather information which is an essential component in identifying the priority housing and community development needs in C3. The ConPlan is developed every 5 years, with identified priority needs and goals to address these needs. Each year of the 5-Year plan, the City develops an AAP which identifies the projects and activities that will address and further the goals of the plan. At the end of each AAP program year, the City will report on the accomplishments and performance of the program through the CAPER. Citizen participation is required in the development of each of these stages as per 24 CFR 91.105.

Citizen Participation for the PY 2024 AAP

In accordance with 24 CFR 91.105, C3 made efforts to allow for participation in the development of the PY 2024 AAP. A public hearing was scheduled to be held on **July 15, 2024**, during City Council in the Council Chambers, Civic Center, 7887 E. 60th Ave Commerce City, CO 80022. A 30-day public comment review period was held from **June 14, 2024, to July 15, 2024**, to allow the public an opportunity to review and make comments on the draft 2024 AAP. There were no comments received. Further, the City amended its plan to remove the Section 108 Loan as a resource and reallocated funds to public facility/infrastructure projects not previously identified in the plan. A 30-day public comment review period was held from **June 20, 2025, to July 22, 2025**, for the substantial amendment. There were no comments received.

Executive Order Compliance

The City of Commerce City agrees that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the U.S. Government payment decisions for purposes of section 3729(b)(4) of title 31, United States Code. The City will not operate any programs that violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964.

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

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

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

PUBLIC COMMENT PERIOD: The draft CAPER was available for (15) fifteen days from **November 17, 2025 through December 2, 2025**. The draft CAPER was available at the Community Development Department office at Commerce City Civic Center, 7887 E. 60th Avenue, Commerce City, CO 80022 and could be viewed from the City department website at: <https://www.c3gov.com/government/community-development-block-grant-cdbg>. Written comments were encouraged and could be mailed or delivered to the address above or via email glewis@c3gov.com.

PUBLIC HEARING: A public hearing was held on **December 2, 2025 at 6:00 PM** during the City Council Meeting held in the Council Chambers, Civic Center, 7887 E. 60th Ave Commerce City, CO 80022. The meeting was also held live on Channel 8 and [c3gov.com/video](https://www.c3gov.com/video). Visit [c3gov.com/council](https://www.c3gov.com/council) for how to access the public hearing and instructions on how to comment at meetings. For more information, please contact the City Clerk's office at (303) 227-8797.

Accessibility: Live Spanish interpretation is available at City Council meetings by calling 720-386-9023 and entering the conference code 104091*. To request accommodations, concerning rights under the Americans with Disabilities Act, to attend or participate in any public meeting, and/or to obtain this notice in alternate formats, contact the City Clerk at 303-227-8791 as soon as possible before the meeting, or call 711 for the state relay service.

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.

PY 2025 is the fifth and final reporting year for the City's 2020-2024 Consolidated Plan. In PY 2024 the City made a substantial amendment to reallocate funding initially intended for Section 108 Loan Repayment to instead be utilized for essential public infrastructure updates in the LMI areas of the City.

While this changed the resources of the program, there were no changes to the original Strategic Plan priorities or goals in the program year. The City does not anticipate any changes in the original program objectives that would result in changes to its current programs. The City will update its upcoming Consolidated Plan through the success and failure of current projects as well as any identified priority needs or goals through the citizen participation process.

CDBG-CV

As of PY 2024 the City has largely completed the CDBG-CV program. With these funds the City assisted LMI residents impacted by the pandemic with rent and mortgage assistance programs. The programs funded were facilitated by Almost Home and Access Housing, which assisted a total of 366 LMI households. Emergency assistance for rent and mortgage payments helped them avoid homelessness in this time of crisis. There is a balance of \$752.10 remaining which will be used to help close out the program. The City expects to spend the remainder of these funds in the next program year to close out the CV grant.

The City will continue to closely monitor the needs of residents, and work to address these needs if any arise. CDBG-CV accomplishments have been summarized in the CR-05 and expenditures are detailed in the CR-15.

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

No

CR-58 - Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG
Total Number of Activities	0
Total Labor Hours	0
Total Section 3 Worker Hours	0
Total Targeted Section 3 Worker Hours	0

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0
Direct, on-the job training (including apprenticeships).	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	0
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0
Held one or more job fairs.	0
Provided or connected residents with supportive services that can provide direct services or referrals.	0
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0
Assisted residents with finding child care.	0
Assisted residents to apply for, or attend community college or a four year educational institution.	0
Assisted residents to apply for, or attend vocational/technical training.	0
Assisted residents to obtain financial literacy training and/or coaching.	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0
Provided or connected residents with training on computer use or online technologies.	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0

Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0
Other.	0

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

This section describes the reporting requirements for Section 3 under 24 CFR 75. Section 3 helps to establish more economically sustainable communities by ensuring that employment and other economic opportunities generated by Federal assistance for development programs such as CDBG are directed towards very low- and low-income persons to the greatest extent possible, and in particular to those who are recipients of the Federal assistance.

The Section 3 Final Rule, noticed on October 29, 2020 by HUD made effective new benchmarks for Section 3. The benchmark for Section 3 workers was set at 25 percent or more of the total number of labor hours worked by all workers on a Section 3 project. The benchmark for Targeted Section 3 workers was set at 5 percent or more of the total number of labor hours worked by all workers on a Section 3 project.

Section 3 Projects cover housing rehab/construction and public improvement construction activities assisted under HUD grant programs that provide housing and community development financial assistance that exceeds a threshold of \$200,000. A \$100,000 project threshold applies to grants under HUD's Lead Hazard Control and Healthy Homes programs. For PY 2024, there were no activities that were subject to the Section 3 threshold.