



City of Commerce City 2025 – 2029 Consolidated Plan

Community Development Department
7887 East 60th Avenue
Commerce City, Colorado 80022

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Executive Summary

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

1. Introduction

The City of Commerce City (C3) is a U.S. Department of Housing and Urban Development (HUD) entitlement city receiving an annual allocation of Community Development Block Grant (CDBG) program funds. All jurisdictions receiving CDBG funds must adopt an Annual Action Plan (AAP) as required by HUD. CDBG-funded activities developed for the AAP adhere to at least one of the three national objectives established by HUD:

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

To receive these funds, the City is required to complete its 2025-2029 Consolidated Plan and first-year PY 2025 Annual Action Plan (AAP) as required by HUD. The Consolidated Plan serves as a planning document meeting the federal government statutory requirements in 24 CFR 91.200-91.230, for preparing a Consolidated Plan and guiding the use of CDBG funding based on applications to HUD. The first-year PY 2025 AAP, and subsequent AAPs, is a subset of the Strategic Plan addressing the overall goals of the plan for each program year of the five-year Consolidated Plan. PY 2025 begins on October 1, 2025, and ends on September 30, 2026.

The City is a member of the Adams County HOME Consortium and receives HOME Investment Partnerships funds through the HOME Consortium. The HOME program is the largest federal block grant to state and local governments designed exclusively to create affordable housing for LMI households. The grant funds a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership, or providing direct rental assistance. Through an Intergovernmental Agreement (IGA), the City receives HOME Program funding on an annual basis. These funds are not programmed in this AAP as the City is not a direct recipient of HOME funds from HUD.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

The City has developed its strategic plan based on an analysis of the data presented in the Needs Assessment, the Market Analysis of the Consolidated Plan, and the community participation and stakeholder consultation process. Through these efforts, the City has identified four (4) priority needs and associated goals to address these needs. Over the 5-Year plan period, the City will work to accomplish the following outcomes, which are listed by Priority Need.

Priority Need: Public Facilities & Infrastructure

Goal - 1A Expand/Improve Public Facilities & Infrastructure

Provide improved access to public facilities in low/mod areas, such as neighborhood facilities, community centers, and parks and recreation facilities. The City will also invest in infrastructure upgrades in low/mod areas, including improvements to streets, sidewalks, and water/sewer systems, to enhance safety, connectivity, and livability.

Priority Need: Public Services

Goal - 2A Provide Services for LMI & Special Need

Provide public services to stabilize low- and moderate-income individuals and households and/or those with special needs (elderly, persons with a disability, homeless) and increase their access to opportunity.

Priority Need: Affordable Housing

Goal - 3A Affordable Housing

Provide homeowner housing rehabilitation activities to help preserve the housing stock of low- to moderate-income households through emergency repairs, ADA modifications, minor home repairs, and exterior improvements to preserve the existing affordable housing stock.

Priority Need: Planning and Administration

Goal - 4A Planning and Administration

Effective program management will include general administration of HUD grant programs, monitoring subrecipients, and keeping strict grant-based accounting. Comprehensive planning requirements will include the development of AAPs, an evaluation of the performance of the programs through annual reports, and meeting citizen participation requirements.

3. Evaluation of past performance

Commerce City (C3), in collaboration with public/private agencies, nonprofit housing providers, and local government entities, continues to make significant contributions toward providing safe, decent, and affordable housing, a suitable living environment, and economic opportunities—especially for low- to moderate-income individuals. Despite progress, affordable housing development and preservation and the delivery of essential public services remain two of the City’s most pressing needs, as documented in the City’s Consolidated Plan and the Consolidated Annual Performance and Evaluation Report (CAPER).

According to the most recent PY 2023 CAPER, the City achieved measurable progress in its housing and community development goals. Key accomplishments are listed below:

Minor Home Repair:

In PY 2023, the City assisted 21 LMI owner-occupied households with single-family housing rehabilitation. Thirteen (13) households were served through the Minor Home Repair Program (MHRP) and eight (8) through the Brothers Redevelopment Paint-a-Thon program. MHRP activities addressed structural issues, critical systems, and deferred maintenance, while the Paint-a-Thon program provided

exterior painting for elderly and disabled residents. Among the 21 total households, 10 were elderly and 5 had a disability.

Public Services and Homeless Prevention:

The City and its partners assisted 1,506 LMI individuals with essential public services that improved their quality of life. Funded programs included the Homeless Prevention Program, Domestic Violence Victims Support Program, and the Snow Guardians program, which provides snow removal services for elderly and disabled residents. These services addressed critical needs for residents at risk of homelessness or facing barriers to independent living.

CDBG-CV:

Although the rent and mortgage assistance programs funded by CDBG-CV were completed in PY 2022—supporting 366 LMI households—\$13,722.28 in remaining funds was reallocated in PY 2023 to the City's Wellbeing Division. These funds are designated to assist households at risk of homelessness due to ongoing impacts of the COVID-19 pandemic. The City expects to expend these funds in the next program year to close out the CV grant.

The City of Commerce City remains committed to achieving its five-year housing and community development goals. Through strategic partnerships, efficient resource allocation, and ongoing investments in public services and infrastructure, the City continues to support its most vulnerable residents and foster long-term community resilience.

4. Summary of citizen participation process and consultation process

The City has adopted its HUD approved Citizen Participation Plan (CPP) as per 24 CFR 91.105, which sets forth the City's policies and procedures for citizen participation in the Consolidated Plan and first-year 2025 AAP. The CPP provides guidance for public notices for the various stages of Consolidated Plan development, public hearings, and the public review of the proposed plan. Details of the City's outreach efforts are provided below:

PUBLIC INPUT MEETING: A public input meeting was held on **May 21, 2024 at 6:00 pm** to review and gather feedback on the ConPlan & AAP. Additional information provided by emailing glewis@c3gov.com.

PUBLIC HEARING: A public hearing will be held on **July 21, 2025**, during City Council in the Council Chambers, Civic Center, 7887 E. 60th Ave Commerce City, CO 80022. The meeting will also be live on Channel 8 and c3gov.com/video. Visit 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.

PUBLIC COMMENT PERIOD: The City will hold a public comment period from June 20, 2025 to July 20, 2025. Drafts of the ConPlan and AAP can be viewed at the Community Development Department office at Commerce City Civic Center, 7887 E. 60th Avenue, Commerce City, CO 80022 or they can be viewed

from the City department website at: <https://www.c3gov.com/government/community-development-block-grant-cdbg>. Written comments are encouraged and can be mailed or delivered to the address above or via email glewis@c3gov.com.

COMMUNITY & STAKEHOLDER SURVEYS:

Community Survey Link: The City, in partnership with Adams County held a community survey online to gather public input on the housing and community development priority needs in the City of Commerce City. The link to the survey can be found at: <https://www.research.net/r/AdamsCounty-Community>

Stakeholder Survey Link: The Consortium held a stakeholder survey online to gather public input on the housing and community development priority needs in Adams County which includes the City of Commerce City. The link to the survey can be found at: <https://www.research.net/r/AdamsCounty-Stakeholder>

Details of citizen participation outreach for the Consolidated Plan and PY 2025 AAP are also located in the PR-15.

5. Summary of public comments

PUBLIC COMMENT PERIOD: A summary of comments will be included after the comment period.

PUBLIC HEARING: A summary of comments will be included after the public hearing.

COMMUNITY & STAKEHOLDER SURVEYS: A summary of survey results will be included after the citizen participation process.

All comments and views will be accepted at the public hearing and public comment period review process. A summary of outreach efforts is located in the PR-15 Participation.

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

All comments or views received during the public comment period and hearing were accepted and considered. No comments were excluded.

7. Summary

The City is committed to providing a meaningful way for residents to communicate their needs. The Community Development Department serves as the primary resource for residents seeking housing, human services, and community development assistance. The City engages with local stakeholders, service providers, and community members to help guide program priorities and funding decisions.

City staff regularly conduct public meetings, outreach events, and consultations to provide residents and stakeholders an avenue to communicate with City officials regarding community needs. The City will continue to update residents on the progress of HUD-funded programs and seek public input to ensure funding decisions align with community priorities.

The Consolidated Plan is comprised of several sections, including an assessment of the current housing and community development needs of the area, information on the citizen participation process, a Strategic Plan, and the PY 2025 Annual Action Plan (AAP). The Strategic Plan is an essential component of the Consolidated Plan, outlining the objectives and outcomes necessary to meet the identified needs. The PY 2025 AAP is the first of five annual action plans, which will detail how federal resources will be allocated each year to achieve the objectives identified in the Consolidated Plan. Additionally, each AAP will be evaluated to see the City's performance in meeting the Consolidated Plan's objectives. At the end of each program year, the City will complete a Consolidated Annual Performance and Evaluation Review (CAPER).

Not only are the priority needs in the City identified through the needs assessment and market analysis, but the City also determines these needs through a citizen participation process, which includes engagement with community nonprofit organizations and with members of the community. As a member of the Adams County HOME Consortium, additional analysis on Comprehensive Housing Affordability Strategy (CHAS) data, Public Housing Authority (PHA) needs, and homelessness trends can be found in the Adams County HOME Consortium Consolidated Plan.

Primary data sources for the Consolidated Plan include 2008-2012 & 2018-2022 American Community Survey (ACS) 5-Year Estimates, Longitudinal Employer-Household Dynamics (LEHD), the Bureau of Labor Statistics (BLS), HUD Low/Mod Income Summary Data and other local data sources. Data for map analysis came from the 2018-2022 ACS.

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

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

Table 1 – Responsible Agencies

Narrative

The lead agency for preparing the 2025-2029 Consolidated Plan (ConPlan) was the Community Development Department and is responsible for the administration of the Community Development Block Grant (CDBG) program. Department staff presents a draft of the AAP to the City Council each year. It reports monthly, quarterly, and annually on the status of activities addressing homelessness, affordable housing, community development, and providing fair housing and equal opportunities to residents. Staff from the Finance, Contracts, and Legal Departments provide CDBG administration support as necessary. City Council approves the AAP and its submittal of plans, plus any substantial amendments to HUD.

Commerce City CDBG staff coordinate with Adams County (County) to assign Commerce's portion of HOME funds. The City Council approves these projects each year; the County administers the funds and is responsible for conducting the citizen participation requirements of the HOME grant.

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)

1. Introduction

The City of Commerce City is committed to gathering input from residents, municipal officials, nonprofit organizations, private and nonprofit housing developers, governmental agencies, and the Regional Continuum of Care as part of the Consolidated Plan and Annual Action Plan processes. Consultations include stakeholder meetings, community input hearings, newspaper advertisements, website announcements, public notices, and public meetings with hearings to solicit feedback on the draft Consolidated Plan and Annual Action Plan.

Citizen participation is strongly encouraged throughout all phases of short- and long-range planning, plan implementation, and effectiveness assessment. In addition to conducting targeted outreach, the City of Commerce City maintains ongoing conversations with partner agencies throughout the year to assess the evolving needs of low- and moderate-income (LMI) residents. City staff rely on these relationships to gather input on community needs, promote available resources, coordinate service partnerships, and develop action plans for the upcoming year.

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

The City of Commerce City actively collaborates with public and private entities to enhance coordination between assisted housing providers, health and mental health service agencies, and nonprofit organizations to address housing, supportive services, and community development needs. The Community Development Department, which administers the City’s Community Development Block Grant (CDBG) program, plays a central role in fostering these partnerships to serve low- and moderate-income (LMI) residents, individuals experiencing homelessness, and other vulnerable populations.

Commerce City participates in regional coordination efforts with entities such as Adams County Human Services, Maiker Housing Partners (formerly Adams County Housing Authority), the Metro Denver Homeless Initiative (MDHI), and nonprofit service providers. These collaborations help address affordable housing shortages, improve service access for at-risk populations, and ensure a comprehensive approach to community development. The City also works with local developers, contractors, and financial institutions to implement CDBG-funded homeowner rehabilitation and housing stabilization programs.

Coordination with public and assisted housing providers, as well as private and governmental health and service agencies, includes ongoing engagement with Maiker Housing Partners, which owns and operates affordable housing units throughout the county. Commerce City staff regularly consult with Maiker to identify affordable housing needs and align programmatic priorities. The City also collaborates with the

Homeless Outreach Team (HOT) and regional CoC partners to conduct street outreach, connect individuals to services, and implement emergency shelter and rapid rehousing interventions. City staff participate in joint planning efforts with organizations delivering services in housing, health, employment, education, food access, and behavioral health.

The City is committed to closing the digital divide for LMI residents. Commerce City has coordinated with partners such as PCs for People and the Adams County Digital Equity Team to expand access to devices, broadband internet, and digital literacy resources. Affordable housing projects supported by Maiker are being designed to include broadband-ready infrastructure, ensuring residents have equitable access to online education, employment opportunities, and telehealth.

Commerce City is also engaged in emergency preparedness, resilience, and hazard mitigation through partnerships with the Adams County Office of Emergency Management and the City's own Emergency Management Division. These efforts are part of broader regional strategies to reduce risk from natural hazards such as flooding and extreme weather. City planning and development reviews also incorporate resilience strategies, including energy efficiency improvements and sustainable infrastructure investments that benefit LMI neighborhoods.

To strengthen local service coordination, the Community Development Department collaborates with other City departments, including the Police Department, Code Enforcement, Parks and Recreation, and the City Attorney's Office. Cross-departmental coordination ensures a holistic approach to addressing housing stability, blight reduction, and neighborhood safety. Commerce City staff also work closely with nonprofit agencies seeking to expand services within the City, providing technical assistance and support for funding applications and program design. The City also supports the efforts of the Commerce City Services Alignment initiative, which is working to establish a Community Campus serving as a centralized hub for health and family services.

As the administrator of CDBG funds, Commerce City ensures that grant resources are strategically allocated to address critical local needs. Staff conduct annual consultations with community-based organizations and service providers to assess gaps in services and evaluate funding priorities. In addition to federal resources, the City continues to support essential programs through local partnerships and leverages outside funding opportunities when available to expand impact.

Commerce City remains committed to strengthening collaboration across housing, health, nonprofit, and emergency response sectors. These coordinated efforts are essential to advancing equitable access to housing, public services, digital infrastructure, and climate resilience for the City's most vulnerable residents.

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

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

The Metro Denver Homeless Initiative leads the Coordinated Entry System (CES), which helps to ensure that people 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.

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

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS

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

The Metro Denver Homeless Initiative serves as the lead agency for Colorado’s HMIS, which houses data about the people accessing services related to homelessness throughout Colorado. The CoC and local partners use this data to track client and program outcomes, measure system performance, and inform regional and local efforts to end homelessness.

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

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	CITY OF COMMERCE CITY
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Market Analysis
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City Community Development Department is the lead agency responsible for the AAP.
2	Agency/Group/Organization	Adams County Community and Economic Development
	Agency/Group/Organization Type	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Other government - County Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The County coordinates with the City and is engaged in ongoing communication and coordination of the AAP and other housing and community development programs.

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

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has a partnership with the organization and is engaged in ongoing communication and coordination. The Police Department is also responsible for Emergency Planning in Commerce City, with a range of services including natural disasters and severe storms.
6	Agency/Group/Organization	Metro Denver Homeless Initiative
	Agency/Group/Organization Type	Services-homeless Publicly Funded Institution/System of Care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-housing Community Development
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has a partnership with the organization and is engaged in ongoing communication and coordination.
7	Agency/Group/Organization	PCs for People
	Agency/Group/Organization Type	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has a partnership with the organization and is engaged in ongoing communication and coordination.

8	Agency/Group/Organization	A Precious Child
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Housing Community Development Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City has a partnership with the organization and is engaged in ongoing communication and coordination.
9	Agency/Group/Organization	Rebuilding Together Colorado
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City is engaged in ongoing communication and coordination. The agency provides housing rehab programs in the metro Denver region.

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

No organizations were intentionally left out of the public participation process. All comments and views were accepted and welcomed.

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

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

Table 3 – Other local / regional / federal planning efforts

Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))

The City of Commerce City works closely with regional and local partners, including Maiker Housing Partners, PCs for People, Adams County Human Services, the Metro Denver Homeless Initiative (MDHI), and various nonprofit organizations to implement programs that address priorities outlined in the ConPlan and AAP. The development of both the Strategic Plan and the AAP involves extensive collaboration with nonprofit service providers, regional and local government agencies, and community-based organizations. Commerce City ensures that public participation, including community meetings, stakeholder interviews, and online surveys, informs the identification and prioritization of needs related to housing, public services, infrastructure, and community resilience.

Commerce City actively participates in regional housing efforts and maintains a strong partnership with Maiker Housing Partners, which owns and operates income-restricted units across Adams County. Maiker continues to develop and rehabilitate affordable housing within and around the City, with recent and future projects integrating broadband-ready infrastructure to ensure that residents have reliable access to high-speed internet. Commerce City has also partnered with PCs for People and Adams County's Digital Equity Team to provide discounted internet service, laptops, mobile hotspots, and digital skills training to low-income households. These efforts are part of the City's broader strategy to close the digital divide and support low- and moderate-income residents' access to virtual learning, employment opportunities, and telehealth services.

The City's Community Development Department plays a key role in supporting nonprofit service providers and facilitating interagency coordination. While Commerce City does not have a centralized public service facility, the City regularly partners with community-based organizations to co-host outreach events, housing resource fairs, and application assistance workshops in civic facilities and neighborhood gathering spaces. The City also promotes nonprofit-led programs through its website, email alerts, and printed outreach materials to extend the visibility and accessibility of essential services for residents.

Commerce City has partnered with a diverse range of service providers to deliver essential programs, including Almost Home (homelessness prevention and housing stabilization), A Precious Child (basic needs assistance), Salud Family Health Centers (healthcare access), Habitat for Humanity and Brothers Redevelopment (housing repairs), and Kids in Need of Dentistry (oral health services). The City also supports regional initiatives such as the Homeless Point-in-Time Count and the Commerce City Services Alignment group, which is working to establish a Community Campus that will serve as a centralized hub for health and wellness services in the City's core.

Through ongoing coordination with housing, broadband, social service, and nonprofit partners, Commerce City remains committed to integrating community input, enhancing service accessibility, and leveraging strategic partnerships to meet the goals identified in the ConPlan. These collaborative efforts help ensure that residents, particularly those in low- and moderate-income households, have access to

affordable housing, digital resources, and vital public services that promote long-term self-sufficiency and community resilience.

PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

City of Commerce City has adopted its HUD approved Citizen Participation Plan (CPP) as per 24 CFR 91.105, which sets forth the City's policies and procedures for citizen participation of the Consolidated Plan and first year 2025 AAP. The CPP provides details about the public notice requirements for all meetings and the various stages of Consolidated Plan development, public hearings, accommodations for persons with disabilities, and the conduct of public review of draft documents. Adhering closely to the CPP, the City held a public comment period and public hearing. Details of these outreach efforts are provided in the table below.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
1	Public Meeting	Non-targeted/broad community	A public input meeting was held on May 21, 2024 at 6:00 pm to review and gather feedback on the ConPlan & AAP. Additional information provided by emailing glewis@c3gov.com.	A summary of comments will be included after the public meeting.	All comments are accepted.	
2	Public Comment Period	Non-targeted/broad community	The City will hold a public comment period from June 20, 2025 to July 20, 2025. Drafts of the ConPlan and AAP can be viewed at the Community Development Department office at Commerce City Civic Center, 7887 E. 60th Avenue, Commerce City, CO 80022 or they can be viewed from the City department website at: https://www.c3gov.com/government/community-development-block-grant-cdbg . Written comments are encouraged and can be mailed or delivered to the address above or via email glewis@c3gov.com .	A summary of comments will be included after the comment period.	All comments are accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
3	Public Hearing	Non-targeted/broad community	A public hearing will be held on July 21, 2025 , during City Council in the Council Chambers, Civic Center, 7887 E. 60th Ave Commerce City, CO 80022. The meeting will also be live on Channel 8 and c3gov.com/video . Visit 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.	A summary of comments will be included after the public hearing.	All comments are accepted.	
4	Community Survey	Non-targeted/broad community	The City, in partnership with Adams County, offered an online community survey to gather input on the housing, fair housing, community development and homeless needs in Commerce City and Adams County. See below the link to the survey. https://www.research.net/r/AdamsCounty-Community	Full survey results will be provided after the citizen participation process.	All comments are accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
5	Stakeholder Survey	Non-targeted/broad community Nonprofits	<p>The City, in partnership with Adams County, offered an online stakeholder survey to gather input on the housing, fair housing, community development and homeless needs in Commerce City and Adams County. See below the link to the survey.</p> <p>https://www.research.net/r/AdamsCounty-Stakeholder</p>	Full survey results will be provided after the citizen participation process.	All comments are accepted.	

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The 2025-2029 Consolidated Plan (ConPlan) for the City of Commerce City provides a framework for addressing the city's most pressing community development needs over the next five years. As an abbreviated ConPlan, this assessment focuses on non-housing community development priorities, including public facilities, public improvements, and public services, while also considering broader demographic and economic trends that shape resource allocation.

To develop a comprehensive understanding of community needs, the City has utilized quantitative data analysis, stakeholder consultations, public input, and institutional knowledge from past initiatives. By incorporating data from the U.S. Census Bureau, HUD, the Bureau of Labor Statistics, and local planning efforts, the City can ensure that funding decisions are informed by both current conditions and projected trends.

This needs assessment serves as a foundation for identifying gaps in services, infrastructure, and public resources, helping to guide federal, state, and local funding allocations. By analyzing demographic shifts, economic conditions, and service accessibility, the City can prioritize investments that enhance community resilience, equity, and long-term sustainability.

Through this data-driven approach, Commerce City aims to align funding with the evolving needs of its residents, ensuring that public facilities, infrastructure, and essential services remain accessible and responsive to the community's growth and diversity.

NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)

Describe the jurisdiction's need for Public Facilities:

Commerce City has identified critical needs in its public facilities to support its growing population and enhance residents' quality of life. Identified public facility improvements include the need for improvements to the parks and trail system in the city. Other identified need for public facilities includes improvements to existing public facilities such as the library, community centers, and health clinics in the City.

How were these needs determined?

The identification of these public facility needs stems from the city's ongoing planning efforts, including the City's 2045 Comprehensive Plan, and from community feedback provided via the community survey.

Describe the jurisdiction's need for Public Improvements:

Commerce City has identified significant needs in public improvements, particularly concerning infrastructure and transportation. As the City continues to grow, infrastructure such as roads and utilizes will need to be updated and extended to support future growth. Additionally, aging infrastructure in the most historic areas of the City need essential updates, such as street repaving, sidewalk improvements, lighting upgrades, and more. Additionally, the development of bike and walking paths along the South Platte River has been prioritized to promote active lifestyles and environmental sustainability.

Transportation infrastructure has also been a focal point, with efforts to improve connectivity and safety. The completion of the E. 72nd Avenue Commuter Rail Station marked a significant milestone, introducing commuter rail services to the city. However, challenges remain in enhancing access and connectivity to major highways and the South Platte River, necessitating further public improvements to fully leverage the station's potential and integrate it seamlessly into the community.

How were these needs determined?

The need for these public improvements has been identified through the City's 2045 Comprehensive Plan efforts and community engagement processes. The city's comprehensive plan outlines goals to ensure adequate and efficient public facilities and infrastructure for current and future residents and businesses. Additionally, studies such as the Urban Land Institute's Technical Advisory Panel report have provided insights into specific areas requiring improvement, particularly around the new commuter rail station, highlighting the necessity for enhanced connectivity and development opportunities.

Describe the jurisdiction's need for Public Services:

Commerce City has long recognized the importance of bolstering public services to support its vulnerable populations. The establishment of the Community Well-Being Division exemplifies this commitment, focusing on coordinating services related to housing, health, and food insecurities. This division aims to develop programs and initiatives that address poverty, homelessness, and neighborhood equity, ensuring that all residents have access to essential services and support. The City is also in need of support for youth programs, senior programs, and essential food services.

How were these needs determined?

The determination of public service needs has been informed by assessments and community feedback. Additionally, consultation with the Community Well-Being Division has highlighted a need for support for homeless populations in Commerce City.

Housing Market Analysis

MA-05 Overview

Market Analysis Overview:

Commerce City, Colorado, is strategically positioned just north of Denver, benefiting from strong transportation infrastructure, including proximity to Denver International Airport and major highways. The city's economy is shaped by its industrial heritage and growing regional employment trends. Key industries in Commerce City include transportation and logistics, manufacturing, construction, and energy. According to the Commerce City Economic Profile, major employers in the city include FedEx Ground, Shamrock Foods, and Liberty Oilfield Services, highlighting its strength in logistics, food distribution, and energy-related services.

Despite a solid economic foundation, many residents commute to nearby cities for employment due to a misalignment between available jobs and the specific workforce skills possessed by the residents of Commerce City. According to Adams County Workforce & Business Center, Commerce City collaborates with regional partners to offer job training, recruitment support, internships, and apprenticeships aimed at bridging this skills gap. Additionally, local workforce development initiatives and partnerships with community colleges help equip residents with the necessary training to access higher-paying and in-demand careers.

Commerce City's economic development strategy focuses on attracting businesses, supporting industrial growth, and investing in infrastructure to sustain long-term economic expansion. The Commerce City Economic Development Department leads efforts to revitalize industrial zones, encourage private investment, and optimize land use for future business expansion. Initiatives such as the Aerotropolis development near Denver International Airport aim to enhance Commerce City's role as a key regional logistics and business hub.

As Commerce City continues to grow, ensuring alignment between workforce capabilities and industry demands, enhancing economic resilience, and strengthening business support remain top priorities. By leveraging strategic partnerships, workforce development programs, and infrastructure investments, the city is well-positioned to expand job opportunities, support its key industries, and promote long-term economic stability for its residents.

MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

Introduction

This section provides an overview of Commerce City's economic development, with a focus on key areas such as business sector employment, unemployment rates, commuting times, and education levels. The accompanying table outlines employment distribution across the county's business sectors. Additionally, the analysis delves into trends in unemployment, average commuting times for workers, and educational attainment, all of which play significant roles in shaping Commerce City's economic landscape and future growth.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	606	897	2%	2%	0
Arts, Entertainment, Accommodations	2,728	1,189	8%	3%	-5
Construction	4,396	5,096	14%	14%	0
Education and Health Care Services	5,519	2,003	17%	6%	-9
Finance, Insurance, and Real Estate	2,114	1,235	7%	3%	-4
Information	811	31	3%	0%	-3
Manufacturing	2,509	2,905	8%	8%	0
Other Services	1,311	1,132	4%	3%	-1
Professional, Scientific, Management Services	3,100	3,242	10%	9%	-1
Public Administration	1,770	1,020	6%	3%	-3
Retail Trade	3,404	2,063	11%	6%	-5
Transportation and Warehousing	2,867	11,576	9%	32%	23
Wholesale Trade	1,040	3,660	3%	10%	7
Total	32,175	36,049	--	--	--

Table 3 - Business Activity

Data Source: 2019-2023 ACS (Workers), 2022 LEHD (Jobs)

Share of Workers

Commerce City faces a moderate worker-to-job imbalance, with approximately 32,175 residents in the workforce and 36,049 local jobs. However, the specific skill sets of the local workforce do not always align with available employment opportunities. This disparity highlights the need to expand local training and education programs that equip residents with the necessary skills while also attracting businesses that align with the workforce's existing expertise. Addressing this gap will be essential to strengthening the city's economic foundation and ensuring that more residents can secure jobs within the local economy rather than commuting elsewhere.

Several key sectors in Commerce City exhibit notable misalignment between workforce availability and job opportunities:

- **Education and Health Care Services** – Nearly 3,500 more skilled workers than available jobs.
- **Arts, Entertainment, and Accommodations** – Over 1,600 more workers than local job opportunities.
- **Transportation and Warehousing** – Nearly 9,000 fewer workers than the number of jobs available in this sector.

To bridge these gaps, Commerce City must prioritize attracting and expanding businesses in industries where skilled workers already reside. Simultaneously, collaboration with local businesses and educational institutions to provide targeted training programs can better prepare residents for in-demand jobs, particularly in high-growth sectors like transportation and warehousing. Aligning economic development strategies with workforce strengths—such as those outlined in Commerce City's Economic Development Strategic Plan—will foster sustainable job growth, reduce outbound commuting, and retain economic activity within the city. Enhancing local employment opportunities will not only improve workforce stability but also contribute to Commerce City's long-term economic resilience and prosperity.

Labor Force

Total Population in the Civilian Labor Force	34,928
Civilian Employed Population 16 years and over	33,489
Unemployment Rate	3.8
Unemployment Rate for Ages 16-24	13.8%
Unemployment Rate for Ages 25-65	3.4%

Table 4 - Labor Force

Alternate Data Source: ACS 2019-2023; BLS Unemployment 2023

Data Source Comments: All data except Unemployment Rate from 2019-2023 ACS

Unemployment Rate

There are several methods for measuring unemployment, each with distinct advantages and limitations. The U.S. Census collects annual unemployment data by census tract, enabling geographic comparisons of unemployment rates across smaller areas. However, this data is typically two or more years old, making it less useful for real-time analysis. In contrast, the Bureau of Labor Statistics (BLS) provides monthly unemployment data, which is more current but only available at the city level, limiting its ability to reflect localized trends within specific neighborhoods or tracts.

2022 Unemployment Rates

Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
5.3	4.8	4.4	3.4	3.1	3.2	3.3	3.1	2.9	3.1	3.4	3.4

2023 Unemployment Rates

Jan	Feb	March	April	May	June	July	Aug	Sept	Oct	Nov	Dec
4.1	4.4	3.8	3.4	3.6	4.1	3.7	4.0	3.6	3.7	3.7	4.1

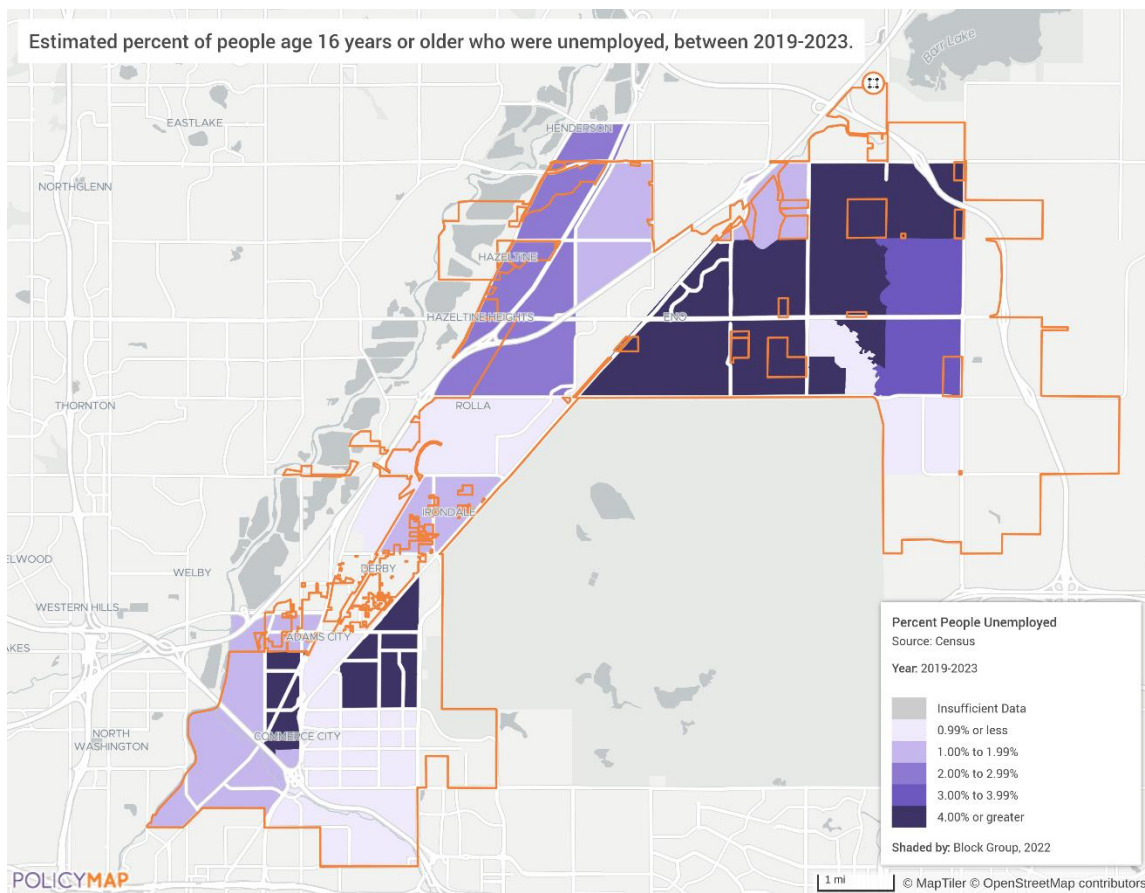
Table 1 - Unemployment Rate, BLS – Commerce City, CO

Commerce City exhibited relatively stable unemployment rates throughout 2023, with fluctuations remaining within a narrow range. The year began with an unemployment rate of 4.1% in January, dipped to its lowest point at 3.4% in April, and returned to 4.1% by December. While the overall trend remained steady, 2023 saw slightly higher unemployment rates compared to 2022, which had a lower peak and a more consistent downward trajectory. This modest increase in unemployment may be linked to broader regional economic shifts or workforce adjustments rather than significant local job losses, as no major employer closures were reported that would have substantially impacted the city's labor market.

Despite this slight uptick, Commerce City's unemployment rate continued to track below national averages, reflecting the area's economic resilience. The city's strong industrial, transportation, and logistics sectors have contributed to job stability, mitigating the effects of minor employment fluctuations. Looking ahead, efforts to expand local job opportunities, attract businesses that align with the existing workforce, and enhance workforce training programs will be critical in maintaining low unemployment levels. Strengthening partnerships between employers, educational institutions, and workforce development initiatives will help ensure Commerce City remains a competitive and stable employment hub.

Unemployment Rate

The map below indicates that while the unemployment rates are relatively low in Commerce City, there are disparities in unemployment rates across the city. Areas in the northeastern and southern regions of the city experience higher concentrations of unemployed individuals, with some of the areas as indicated by darker shading exceed 4%, while other parts of the city report rates below 1%. These variations suggest unequal access to employment opportunities, likely influenced by industry presence, workforce training access, and transportation connectivity. Targeted economic development efforts and workforce initiatives will be essential to expanding job access and reducing unemployment in high-need areas, fostering a more balanced and inclusive labor market across Commerce City.



Occupations by Sector

Occupations by Sector	Number of People
Management, business and financial	12,344
Farming, fisheries and forestry occupations	144
Service	4,613
Sales and office	6,888
Construction, extraction, maintenance and repair	4,310
Production, transportation and material moving	5,190

Table 5 – Occupations by Sector

Alternate Data Source: 2019-2023 ACS

Occupations by Sector

The "Occupations by Sector" table illustrates the distribution of job types across various industries in Commerce City, differing from a previous table that focused on the distribution of jobs within specific sectors. For instance, managerial positions, whether in corporate offices or retail, are classified under "Management, Business, and Financial" in this table but would be categorized by industry in the earlier table.

In Commerce City, the largest occupational group is the Management, Business, and Financial sector, with 12,344 jobs. The second largest group is the Sales and Office sector, comprising 6,888 jobs. These sectors encompass vital roles such as managers, financial analysts, business professionals, retail workers, administrative staff, and customer service representatives, emphasizing the importance of professional and office-related occupations in the city's workforce.

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	13,834	49.1%
30-59 Minutes	12,228	43.4%
60 or More Minutes	2,113	7.5%
Total	28,175	100%

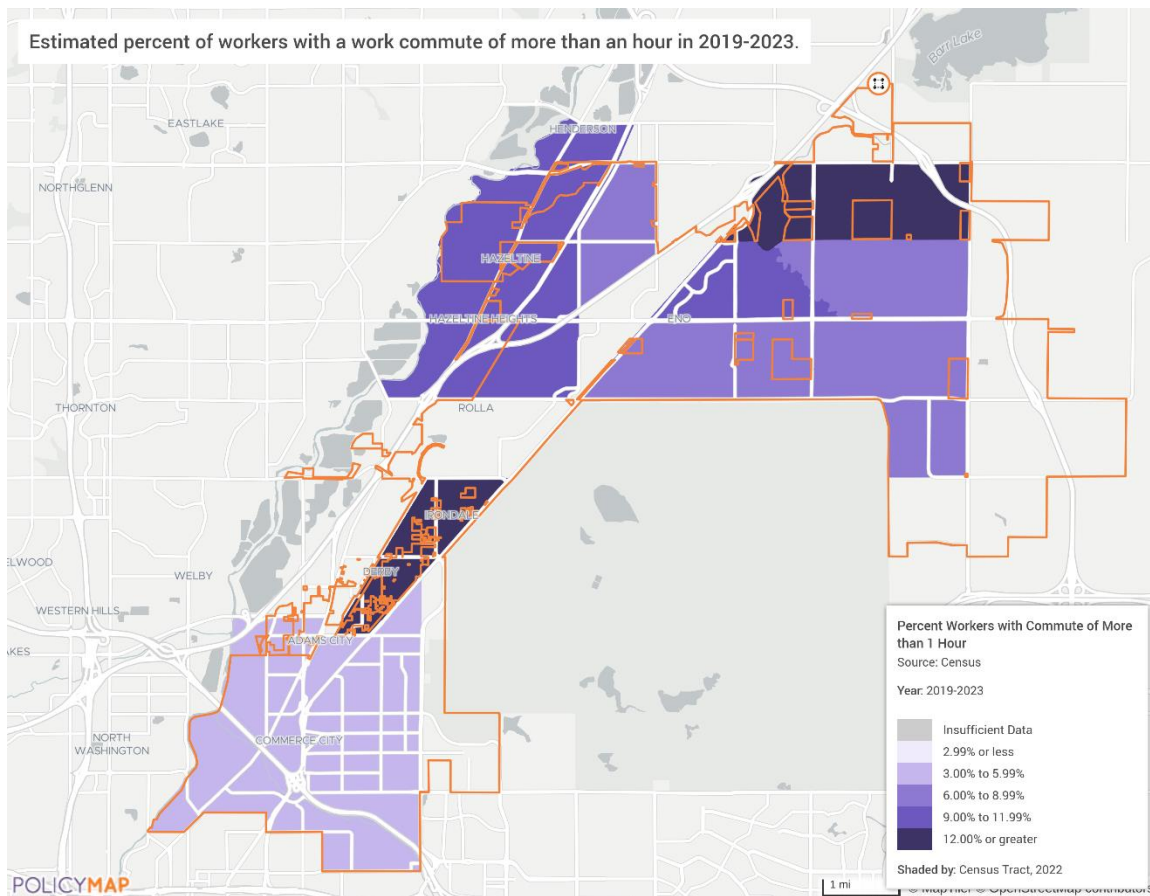
Table 6 - Travel Time

Alternate Data Source Name: 2019-2023 ACS

Commute Travel Time

In Commerce City, most residents experience short to medium commutes, with 49.1% (13,834 commuters) traveling less than 30 minutes, while 43.4% (12,228 commuters) spend between 30 and 59 minutes commuting each way. A smaller but notable 7.5% (2,113 commuters) face commutes of 60 minutes or more, often traveling to employment centers outside the city.

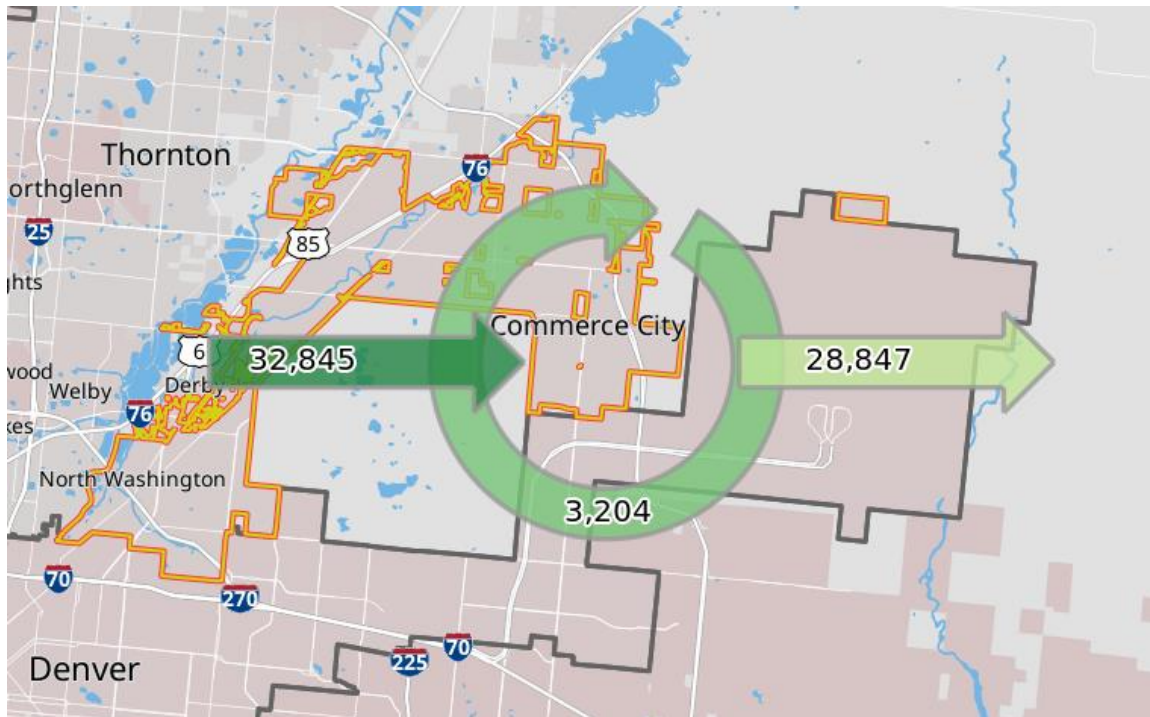
The map illustrates areas where residents endure longer commute times, with darker shading representing higher concentrations of workers commuting over an hour, emphasizing the need for expanded local employment opportunities and improved transportation infrastructure to reduce commute burdens.



Commute Time More Than 1 Hour

Inflow-Outflow of Jobs in 2022

The map below illustrates the job inflow and outflow in Commerce City, highlighting the city's significant commuting patterns. Only 3,204 Commerce City residents are employed within city limits, while approximately 28,847 residents commute outside the city for work. Conversely, 32,845 individuals who work in Commerce City live outside the city, demonstrating a reliance on external labor sources. This imbalance underscores the need for expanded local job opportunities and targeted education and job-training programs to retain more of Commerce City's workforce within the city, reducing commute times and strengthening the local economy.



Inflow-Outflow of Jobs in 2022

	Count
Employed in the Selection Area	36,049
Employed and Living in the Selection Area	3,204
Employed in the Selection Area but Living Outside	32,845
Living in the Selection Area but Employed Outside	28,847

Data Source: 2022 LEHD Inflow/Outflow Job Counts

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	3,631	236	1,204
High school graduate (includes equivalency)	8,357	543	2,076
Some college or Associate's degree	8,800	331	1,355
Bachelor's degree or higher	8,068	142	666

Table 7 - Educational Attainment by Employment Status

Data Source Name: ACS 2019-2023

Educational Attainment by Employment Status

Educational attainment is a key determinant of economic success, influencing both employment stability and earning potential. In Commerce City, unemployment rates vary significantly by education level, highlighting the direct correlation between higher education and workforce outcomes. Residents without a high school diploma face a 4.7% unemployment rate, while those with a high school diploma or equivalent have a slightly higher rate of 5.0%. Individuals with some college or an Associate's degree make up the largest segment of the workforce and experience a reduction in unemployment at 3.1%. Those with a Bachelor's degree or higher not only make up the second largest segment of the workforce but also have the lowest unemployment rate at 1.6%.

Despite low unemployment rates across all education levels, workforce inflow and outflow trends suggest that there may be an imbalance between the types of jobs available within Commerce City and the qualifications of its workforce. While residents with higher education levels are more likely to be employed, many may be seeking job opportunities outside the city that better align with their skills and earning expectations. Addressing this potential mismatch through targeted workforce development, employer partnerships, and business expansion could help retain more educated workers in Commerce City while ensuring that local industries have access to a skilled labor force.

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	39	278	434	1,713	503
9th to 12th grade, no diploma	713	452	1,106	1,032	698
High school graduate, GED, or alternative	2,018	3,266	2,310	5,291	1,885
Some college, no degree	984	1,918	2,435	2,994	1,173
Associate's degree	109	980	1,216	1,124	230
Bachelor's degree	282	1,901	1,714	2,440	578
Graduate or professional degree	29	665	1,246	919	298

Table 8 - Educational Attainment by Age

Alternate Data Source Name: ACS 2019-2023

Educational Attainment by Age

The table above provides a detailed breakdown of educational attainment by age for Commerce City residents 18 and older, offering insight into education trends and their impact on workforce development and economic mobility. While higher education levels are generally correlated with older age groups, this pattern is not absolute. In Commerce City, advanced degrees are relatively evenly distributed among individuals between the ages of 25 and 65, indicating a well-established workforce with diverse career trajectories and continued professional development.

These trends highlight the importance of accessible education and skill development programs that support workers at all stages of their careers. Ensuring that educational opportunities align with industry demands can strengthen workforce adaptability and long-term economic growth. By fostering lifelong learning initiatives, employer-sponsored training, and higher education partnerships, Commerce City can continue to build a highly skilled labor force that meets the evolving needs of its economy.

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$49,032
High school graduate (includes equivalency)	\$49,144
Some college or Associate's degree	\$63,263
Bachelor's degree	\$78,716
Graduate or professional degree	\$90,451

Table 9 - Median Earnings in the Past 12 Months

Alternate Data Source Name: ACS 2019-2023

Median Earnings by Educational Attainment

Educational attainment is a key determinant of potential earnings and financial stability. In Commerce City, individuals with higher education levels experience significantly greater median earnings. For instance, a person with a Bachelor's degree typically earns around 60% more income than someone without a high school diploma, while those with a graduate or professional degree can expect to earn around 84% more than what someone earns with a high school diploma or its equivalent. Over the span of a career, this income disparity becomes even more pronounced. An individual with a bachelor's degree working from age 23 to 62 can expect to earn around \$3.07 million, compared to approximately \$2.16 million for someone with a high school diploma working from age 18 to 62—an earnings difference of more than \$900,000 in their lifetime. This gap in lifetime earnings contributes significantly to wealth accumulation, further supported by the higher likelihood of home ownership, investments, and retirement savings often associated with higher salaries.

Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?

The Education and Health Care Services sector is a cornerstone of Commerce City's economy, employing 5,519 residents and representing nearly 17% of the local workforce. However, with only 2,003 jobs available in this field, a workforce-job mismatch exists, forcing many skilled professionals to seek employment outside the city. Expanding job opportunities within this sector would better align local employment with workforce expertise, reducing outbound commuting and fostering economic stability.

Similarly, the Transportation and Warehousing sector holds the highest number of local jobs, with 11,576 positions, yet only 2,867 of these jobs are currently filled. This sector has room for additional workforce engagement, presenting an opportunity to attract more workers with this skill set to fill unoccupied positions and support business growth within Commerce City.

Both industries are critical to the city's economic stability, providing essential services, workforce opportunities, and long-term growth potential. Addressing employment imbalances through targeted economic development efforts and business recruitment strategies can help strengthen the local job market, retain skilled workers, and enhance Commerce City's economic resilience.

Describe the workforce and infrastructure needs of the business community:

The business community in Commerce City faces several key workforce and infrastructure needs essential for economic growth and long-term competitiveness. Addressing these challenges through strategic investments and partnerships will help businesses thrive while strengthening the city's economic foundation.

Workforce Needs

- **Skilled Labor Availability:** Businesses in Commerce City require access to a workforce with specialized skills to meet industry demands. The Adams County Workforce & Business Center (WBC) provides free candidate recruitment services for all Adams County business owners, including job postings, prescreening, customized hiring events, and on-the-job training.
- **Workforce Development Programs:** Expanding workforce training, recruitment, and upskilling programs is critical to meeting employer needs. The Adams County WBC offers various employment resources, such as access to job listings, virtual job fairs, and job search assistance. Additionally, the Workforce Innovation and Opportunity Act (WIOA) provides federal funds for programs to assist individuals who are underemployed or unemployed, enabling them to receive intensive job readiness services, including comprehensive assessments, individual employment plans, and skills-based employment training.

Infrastructure Needs

- **Transportation and Mobility:** Efficient transportation networks are necessary for business operations, employee commutes, and customer access. Commerce City has received a \$1.6 million funding boost from the U.S. Department of Transportation to study connections along E. 60th Avenue, aiming to improve access for residents to jobs, parks, and grocery stores. Additionally, the city is part of the Regional Transportation District's (RTD) N Line commuter rail, which opened in September 2020, providing enhanced connectivity to Denver and surrounding areas.
- **Utility and Facility Upgrades:** Reliable infrastructure is fundamental for business functionality, particularly in high-growth areas. Commerce City is developing a Broadband Infrastructure Plan to analyze the existing broadband infrastructure, identify service gaps, and create a conceptual infrastructure buildout design for future broadband development. Additionally, the city is undertaking infrastructure improvements, including sidewalk and pedestrian safety upgrades, to enhance accessibility and compliance with the Americans with Disabilities Act (ADA).

- **Redevelopment Initiatives:** Attracting new businesses and revitalizing underutilized properties remain priorities for economic development. Commerce City has launched the Advancing Commerce City Together (ACT) Program, which includes workforce development, community wellbeing, housing, infrastructure improvements, livability, food equity, and environment and workforce development initiatives. In the workforce realm, the program aims to establish apprenticeship opportunities, GED grant support, and higher education funding through potential partnerships, thereby supporting workforce development and community revitalization.

By strengthening workforce training, expanding infrastructure investments, and supporting business redevelopment, Commerce City is working toward a more resilient and business-friendly environment. These efforts will help retain skilled workers, attract new industries, and ensure sustainable economic growth for the city.

Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Commerce City is poised for significant economic growth through a series of planned public and private sector investments and initiatives. These developments are expected to influence job creation and business expansion both in the short term and extending through 2029 and beyond.

Major Investments and Initiatives:

- **Mile High Greyhound Park Redevelopment:** According to Commerce City's Economic Development Department, the city is seeing its first hotel development within the Mile High Greyhound Park neighborhood. This project is a collaboration between the Urban Renewal Authority, TGC Development Group, and Delwest.
- **Würth Industry North America Relocation:** Based on information from Commerce City's Economic Development team, Würth Industry North America (WINA) has announced the relocation of two of its divisions—Würth MRO and Würth Revcar Fasteners Industrial—to a new 82,744-square-foot facility in the Colorado Logistics Park. This move represents a \$3 million capital investment and will retain 70 jobs, reinforcing Commerce City's strength as a hub for industrial and logistics operations.
- **Volunteers of America Expansion:** As reported by Commerce City's Economic Development Department, Volunteers of America has expanded its presence in Commerce City with a new Aging and Nutrition Services center located at 4915 E. 52nd Avenue. This facility employs 60 individuals and plays a critical role in providing social services to the city's aging population, further strengthening Commerce City's support network for vulnerable residents.
- **Economic Development Strategic Plan:** According to a 2024 article from *Colorado Community Media*, Commerce City adopted a five-year Economic Development Strategic Plan in October 2024 to guide

major economic decisions. The plan prioritizes developing a "complete community" by investing in local businesses, supporting commercial expansion, and enhancing public infrastructure to improve quality of life and economic resilience.

Implications for Workforce Development, Business Support, and Infrastructure:

- **Workforce Development:** According to Commerce City's Community Well-Being Division, the city has launched a workforce pathway program to better align workforce skills with industry demands. This initiative provides support for residents seeking to further their careers through GED attainment, apprenticeships, and higher education. The program aims to bridge skill gaps and equip workers with the necessary training to meet growing employer needs in logistics, manufacturing, and service industries.
- **Business Support:** Based on information from the Adams County Workforce and Business Center (WBC), Commerce City provides robust support for businesses through free employment assistance services. These services include job postings, prescreening, customized hiring events, and on-the-job training, all designed to help businesses find and retain skilled employees. By facilitating recruitment and workforce retention, Commerce City aims to ensure businesses remain competitive and well-staffed.
- **Infrastructure Enhancements:** According to Commerce City's Infrastructure Improvement Plan, the city is actively investing in public infrastructure upgrades to support business expansion and workforce mobility. Sidewalk and pedestrian safety improvements are being implemented to enhance accessibility, particularly in high-traffic commercial areas. Additionally, Commerce City is developing a Broadband Infrastructure Strategic Plan to identify gaps in broadband service and expand high-speed internet access, ensuring businesses and residents have reliable digital connectivity to support modern commerce and workforce needs .

These strategic investments and initiatives are set to bolster Commerce City's economic landscape, fostering job creation, business growth, and sustainable development well into the future. By prioritizing workforce training, business support, and infrastructure expansion, Commerce City is positioning itself as a resilient and business-friendly environment for long-term prosperity.

How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?

The skills and education of Commerce City's workforce show both strengths and gaps in relation to local employment opportunities. While certain sectors have a close alignment between worker availability and job opportunities, other industries experience significant mismatches, indicating a need for targeted workforce development strategies.

Alignment of Workforce Skills with Employment Opportunities

Some industries have a relatively balanced supply of workers and jobs, suggesting that workforce skills align well with employer demands. These include:

- **Construction** (14% of workers and 14% of jobs)
- **Manufacturing** (8% of workers and 8% of jobs)
- **Professional, Scientific, and Management Services** (10% of workers and 9% of jobs)

Industries like transportation and warehousing (9% of workers vs. 32% of jobs) and wholesale trade (3% of workers vs. 10% of jobs) face significant shortages of local workers, meaning many positions are either unfilled or rely on commuters from outside Commerce City. Conversely, fields like education and healthcare services (17% of workers vs. 6% of jobs) and arts, entertainment, and accommodations (8% of workers vs. 3% of jobs) have more skilled workers than available job opportunities, suggesting that some residents may need to seek employment outside of Commerce City.

Educational Attainment and Workforce Gaps

The educational attainment data for Commerce City's labor force further illustrates potential workforce development needs:

- **High School or Less:** A significant portion of Commerce City's labor force has a high school diploma (8,626 workers) or less (6,123 workers), making up the majority of the workforce. These individuals may have limited access to higher-paying, specialized positions that require post-secondary education or technical skills.
- **Some College or Associate's Degree:** 7,677 workers have attended some college or earned an associate's degree, providing a solid foundation for mid-level positions.
- **Bachelor's Degree or Higher:** Only 4,717 workers hold a bachelor's degree or higher, limiting the pool of candidates for professional and technical roles that require advanced education.

With industries like professional services and management showing balanced job availability and workforce presence, this indicates that there is potential for growth in skilled occupations. However, given the large portion of the workforce with a high school diploma or less, there is a pressing need for skills

training programs, apprenticeships, and certifications to better align with high-demand fields like transportation, warehousing, and logistics.

Workforce Development Needs

Commerce City should consider:

1. Expanding vocational training and apprenticeship programs in sectors with worker shortages, such as transportation, logistics, and skilled trades.
2. Strengthening partnerships with local community colleges and technical schools to offer training in specialized fields where gaps exist, such as supply chain management and advanced manufacturing.
3. Improving workforce mobility and transit access to connect residents with available jobs, particularly in sectors with worker shortages.

By strategically investing in education, job training, and workforce alignment initiatives, Commerce City can bridge existing employment gaps and ensure that local businesses have access to the skilled workforce they need to thrive.

Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.

Commerce City is actively engaged in several workforce training initiatives, supported by Workforce Investment Boards, community colleges, and other organizations. These programs are designed to enhance the skills of the local workforce, aligning them with industry demands, and are expected to bolster the local economy over the next five years and beyond.

Current Workforce Training Initiatives:

- **Commerce City's Workforce Pathway Program:** In collaboration with the Community Well-Being Division, Commerce City has launched a Workforce Pathway Program aimed at individuals seeking to advance their careers through GED attainment, apprenticeships, or further education. This program offers comprehensive support, including connections to services that assist with daycare, housing, or transportation needs, thereby addressing potential barriers to educational and career advancement.
- **Adams County Workforce & Business Center (ACWBC) Adult Programs:** The ACWBC provides a range of services to job seekers, including job leads, labor market information, career counseling, education assessments, and training for in-demand jobs. They also offer work-based learning opportunities such as apprenticeships, work experiences, and on-the-job training, all aimed at enhancing employability and professional development.
- **Community College of Denver's Center for Workforce Initiatives (CWI):** The CWI connects employers, workers, students, and community partners to facilitate skills-building credentials and robust industry partnerships. Their services include adult education (e.g., English Language Learning, High-School Equivalency), continuing education programs, and corporate training services, all tailored to meet the evolving needs of the workforce.
- **Colorado Community College System (CCCS) Workforce Development Collaborations:** CCCS engages in workforce development through multiple committees and groups, such as the Workforce Development Committee and Apprenticeship Community of Practice. They partner with organizations like Skillful and the Colorado Workforce Development Council to develop job profiles in sectors like healthcare and behavioral health, supporting career pathways and competency validation.

Anticipated Economic Impact Over the Next 5+ Years:

These workforce training initiatives are poised to significantly contribute to Commerce City's economic growth in several ways:

- **Enhanced Employability:** By providing residents with access to education, certifications, and apprenticeships, these programs aim to align the local workforce's skills with the needs of employers, thereby reducing unemployment and underemployment rates.

- **Attraction of New Businesses:** A well-trained workforce is a critical factor for businesses considering relocation or expansion. These initiatives enhance Commerce City's appeal as a destination for companies seeking a skilled labor pool, potentially leading to increased business investments in the area.
- **Economic Diversification:** By focusing on training in high-demand sectors such as healthcare, technology, and advanced manufacturing, these programs support the diversification of Commerce City's economy, making it more resilient to industry-specific downturns.
- **Increased Earning Potential:** As residents acquire new skills and certifications, their earning potential rises, leading to increased consumer spending within the local economy, which can stimulate further economic activity and growth.

Collectively, these workforce training initiatives are strategically designed to create a more adaptable and skilled workforce, positioning Commerce City for sustained economic prosperity in the coming years.

Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?

No. Commerce City does not participate in a CEDS.

If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.

Commerce City is actively engaging in several economic development initiatives that align with the objectives of the 2025-2029 Consolidated Plan. These initiatives aim to enhance the local economy, support business growth, and improve the quality of life for residents.

- **Economic Development Strategic Plan:** Adopted in October 2024, this five-year plan serves as a roadmap for major economic decisions in Commerce City. It emphasizes creating a "complete community" by investing in local businesses, restaurants, and community assets to strengthen the local economy. The plan's focus areas include enhancing economic opportunities for residents and businesses, building a desirable community reputation, and encouraging innovation within existing industries while exploring new sectors.
- **E-470 Public Highway Authority Initiatives:** The E-470 toll road, which traverses Commerce City, has undergone significant developments to improve transportation infrastructure. Enhancements such as the widening projects completed in 2017 have improved traffic flow and accessibility. These improvements facilitate commerce and can attract businesses seeking efficient transportation links, thereby impacting economic growth in the region.

Collectively, these initiatives and plans demonstrate Commerce City's commitment to strategic economic development, aligning with the 2025-2029 Consolidated Plan's objectives to foster a thriving, inclusive, and sustainable community.

MA-50 Needs and Market Analysis Discussion

Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

HUD defines “housing problems” based on four specific data points: cost burden, overcrowding, lack of complete plumbing facilities, and lack of complete kitchen facilities. In Commerce City, housing issues are infrequent overall, except for cost burden. According to the 2019-2023 ACS 5-Year Estimates, the citywide rates are as follows:

- Cost Burden Renters: 56.8%
- Cost Burden Homeowners: 24.5%
- Overcrowding: 4.8%
- Lack of Complete Plumbing Facilities: 0.4%
- Lack of Complete Kitchen Facilities: 0.4%

For an area to be considered "concentrated" with housing issues, it must exhibit two or more problems significantly above the citywide averages, using HUD's definition of “disproportionate.” This threshold in Commerce City is set at 10 percentage points higher than the city average, equating to: a cost burdened renter above 66.8.2%, a cost burdened homeowner above 34.5%, overcrowding above 14.8%, lack of plumbing facilities above 10.4%, and lack of kitchen facilities above 10.4%.

In Commerce City, there are no tracts that meet the criteria for having more than one concentrated housing problem.

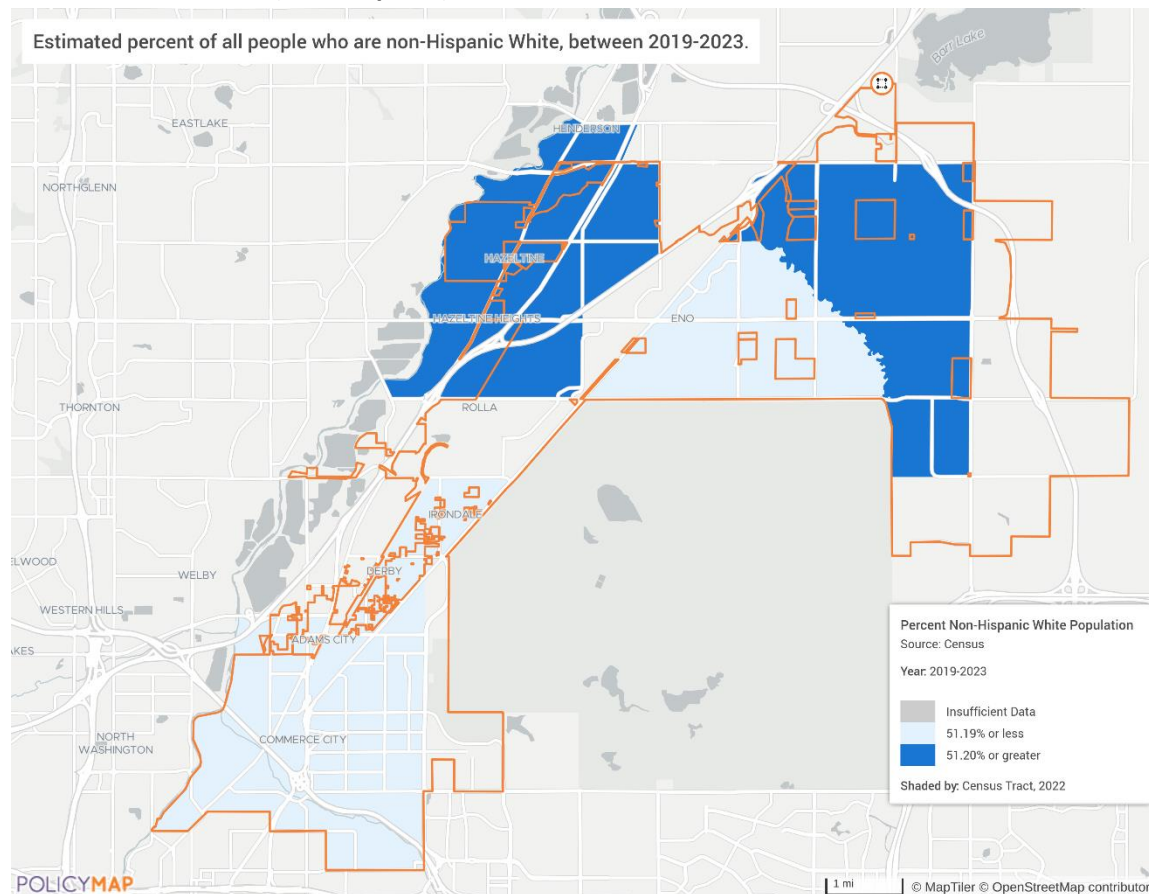
Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")

For the purposes of this analysis a “racial or ethnic concentration” will be any Census Tract where a racial or ethnic minority group makes up 10 percent or more of the population than the city as a whole. According to the 2019-2023 ACS 5-Year estimates the racial and ethnic breakdown of Commerce City’s population is:

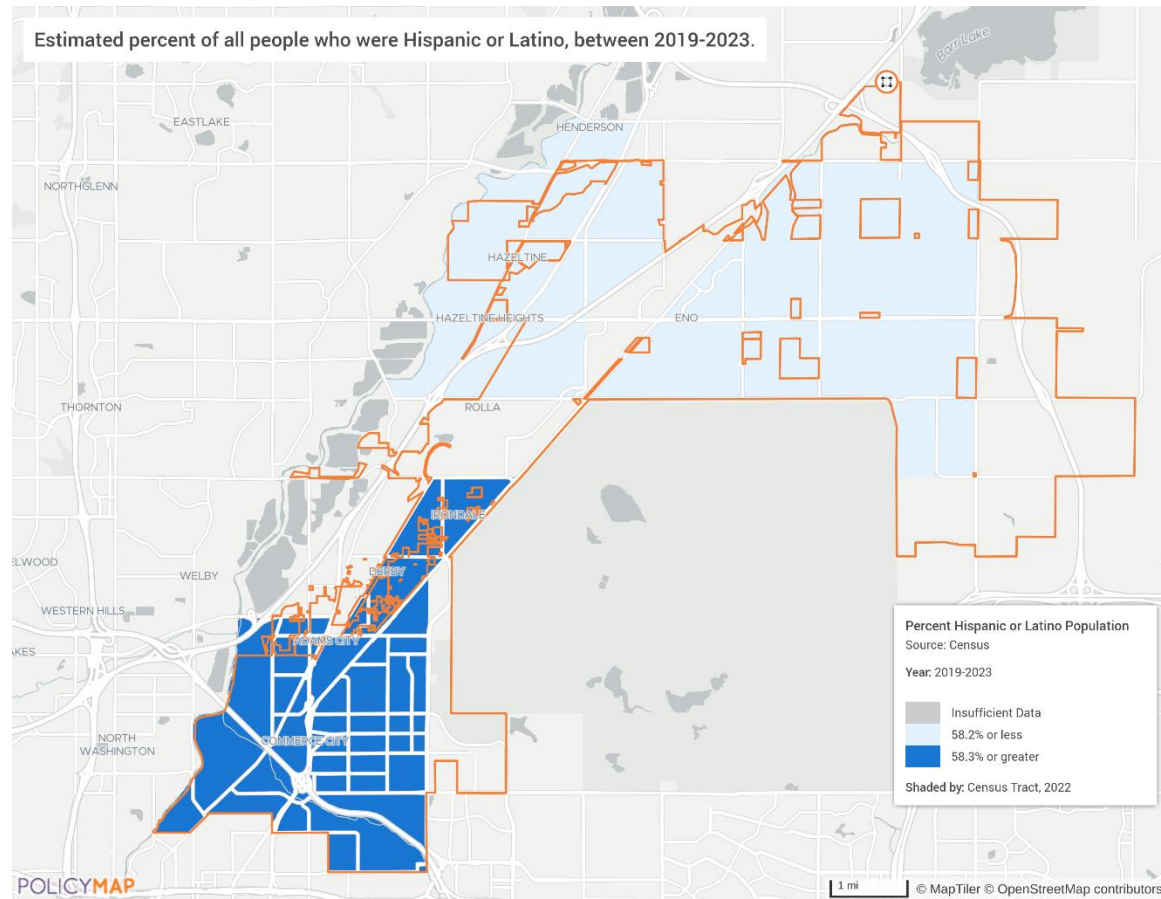
- Black, non-Hispanic: 4.4%
- White, non-Hispanic: 41.2%
- American Indian and Alaska Native, non-Hispanic: 0.2%
- Asian, non-Hispanic: 2.4%
- Native Hawaiian and Other Pacific Islander, non-Hispanic: 0.2%
- Other Race, non-Hispanic: 0.5%
- Two or More Races, non-Hispanic: 2.8%
- Hispanic or Latino: 48.3%

In Commerce City, Hispanic households and White households are the largest demographic groups, with significant concentrations within the city as indicated by darker shading in the following maps. Other racial or ethnic groups do not display notable concentrations based on the established analysis criteria. The maps below illustrate these racial and ethnic distributions across Commerce City, excluding populations without significant concentrations.

Concentration White (non-Hispanic) households over 51.2%



Concentration Hispanic/Latino households over 58.3%

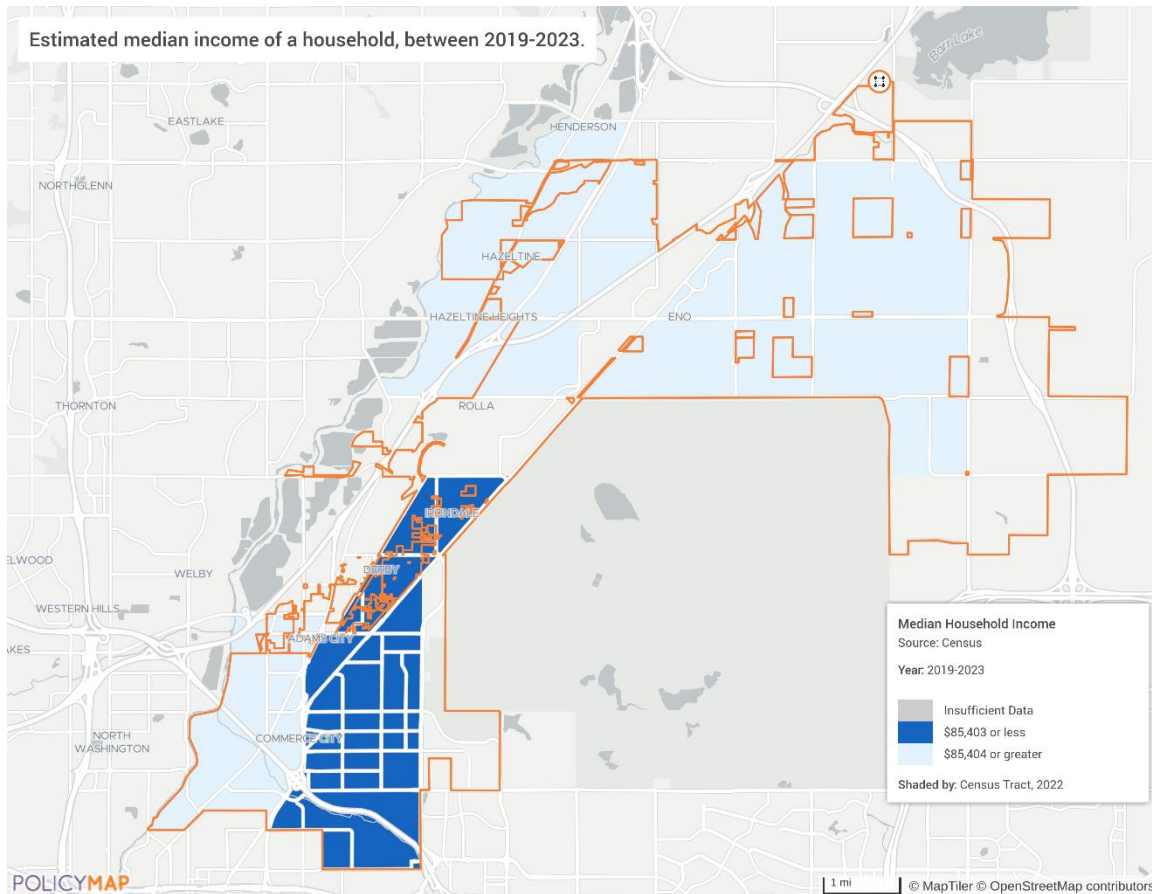


Low Income Households

A “low-income concentration” is any census tract where the median household income for the tract is 80% or less than the median household income for Commerce City. According to the 2019-2023 ACS 5-Year Estimates, the Median Household Income in Commerce City is \$106,756. A tract is considered to have a low-income concentration if the MHI is \$85,404 or less. There are three tracts with a low-income concentration listed below and displayed on the following map.

- Tract 08001008801 - \$73,378
- Tract 08001008706 - \$44,327
- Tract 08001008705 - \$63,785
- Tract 08001008709 - \$56,182

Low Income Households (Income below \$85,404)



What are the characteristics of the market in these areas/neighborhoods?

In Commerce City, low-income neighborhoods exhibit distinct housing market characteristics shaped by a combination of historical development patterns and targeted affordable housing initiatives. A notable feature is the presence of affordable housing complexes developed through programs like the Low-Income Housing Tax Credit (LIHTC). For instance, Conter Estates I and II, located at 6600 E. 60th Place, offer a total of 114 affordable senior housing units for individuals aged 55 and older. These properties were developed in partnership with the Commerce City Housing Authority (CCHA) and financed partially through the LIHTC program, providing a mix of units for low-income households and market-rate renters. This blend ensures a diverse community while addressing the housing needs of low-income seniors.

Additionally, properties like Kearney Plaza Apartments and Madonna Plaza contribute to the affordable housing landscape. Kearney Plaza Apartments, situated at 6140 E. 60th Ave., comprises 96 income-based rental units, ensuring affordability for qualifying residents. Madonna Plaza, located at 6275 Kearney St., is a 50-unit apartment building owned and operated by Archdiocesan Housing, providing affordable, service-enriched housing options. These developments highlight a concerted effort within Commerce City to maintain and expand affordable housing options, catering to the needs of low-income residents and fostering inclusive communities.

Are there any community assets in these areas/neighborhoods?

Low-income neighborhoods in Commerce City are bolstered by a variety of community assets that enhance residents' quality of life and foster community development. The Commerce City Housing Authority (CCHA) plays a pivotal role by offering housing opportunities and resources to assist residents in buying, renting, or improving their homes. The CCHA's mission is to create and sustain housing for low-income residents, recognizing that affordable housing is essential for a diverse and thriving community. Through its strategic plan, the CCHA outlines initiatives aimed at expanding affordable housing options and supporting residents in achieving housing stability.

Beyond housing, the city undertakes various neighborhood projects aimed at enhancing community infrastructure and aesthetics. These initiatives may include neighborhood improvements, master plans, infrastructure updates, and revitalization efforts. By focusing on such projects, Commerce City demonstrates a commitment to improving the living conditions in low-income neighborhoods, fostering a sense of community pride, and encouraging resident engagement.

Are there other strategic opportunities in any of these areas?

Commerce City has several strategic opportunities to further support and develop its low-income neighborhoods. One key area is the preservation and expansion of affordable housing to meet the growing demand and prevent displacement. The city can explore partnerships with organizations like the Urban Land Conservancy, which focuses on acquiring, developing, and preserving community assets, including affordable housing and nonprofit facility spaces. Engaging in such collaborations can ensure that affordable housing remains accessible to low-income residents.

Another opportunity lies in enhancing transportation connectivity, particularly around transit stations, to improve access to employment and services. The Urban Land Institute's Technical Advisory Panel report emphasizes the importance of connecting neighborhoods to transit options, which can stimulate economic development and provide residents with greater mobility. By focusing on transit-oriented development, Commerce City can create mixed-use, pedestrian-friendly areas that attract businesses and provide residents with convenient access to amenities.

Additionally, fostering community engagement and partnerships can empower residents and ensure that development initiatives align with their needs and aspirations. Implementing asset-based community development approaches, which focus on leveraging existing community strengths and resources, can lead to more sustainable and effective outcomes. By involving residents in the planning and implementation of projects, Commerce City can build stronger, more resilient communities that reflect the desires and needs of those who live there.

MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)

Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.

Internet access is a critical component of modern communication and information-sharing, enabling users to benefit from the growing interconnectedness of business, education, commerce, and everyday activities. Reliable internet connectivity has become essential for success in today's economic landscape. Communities without broadband access face significant challenges in keeping pace with the rest of the country. The lack of broadband infrastructure limits residents' ability to access educational and entrepreneurial opportunities, which is especially concerning in low- to moderate-income (LMI) areas where economic opportunities are often limited.

Research from the Pew Research Center underscores the vital role that high-speed internet plays in enhancing educational and employment opportunities, particularly in underserved communities. The center's studies have shown that individuals with reliable broadband access are more likely to engage in online learning, apply for jobs, and participate in economic activities that can improve their quality of life.

Similarly, reports from the Federal Communications Commission (FCC) highlight the direct correlation between broadband availability and economic development. The FCC's findings indicate that regions with robust internet infrastructure experience higher rates of job creation, educational attainment, and overall community growth.

Commerce City enjoys comprehensive broadband coverage, with the vast majority of the city offering various internet service provider options, including in LMI areas. The average Commerce City household has access to at least three broadband-quality internet service options. According to ISPReports.org, Commerce City benefits from a variety of infrastructure options, including cable, fiber, fixed wireless, and DSL. Ninety-two percent (92%) of households in Commerce City have an internet connection, with the city providing 99.98% availability. Of those households, 82% have fiber, cable, or DSL, 6% have satellite, 0% are still on dial-up, and 2% of households have internet but don't pay for a subscription because it's subsidized by the Affordable Connectivity Program. The map below illustrates broadband availability throughout Commerce City, defined as advertised internet speeds of 768 kilobits per second or higher.

See map: Broadband Access

Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

To ensure high-quality broadband service, it is crucial to foster competition among service providers. A lack of competition, where a single provider dominates an area, can diminish the incentive to deliver reliable and consistent services. According to ISPReports.org, Commerce City is served by seventeen (17) Internet providers offering residential service. Among these, Xfinity and Century Link stand out as the leading providers in terms of coverage and speed. Internet providers throughout the city include:

XFINITY (Fiber and Cable)

CenturyLink (Fiber and DSL)

Quantum Fiber (Fiber)

Intrepid Fiber (Fiber)

Earthlink (Fixed Wireless)

T-Mobile Home Internet (Fixed Wireless)

Verizon (Fixed Wireless)

Aerux Broadband (Fixed Wireless)

Live Wire Networks (Fixed Wireless)

AT&T (Fixed Wireless)

Rise Broadband (Fixed Wireless)

Hilltop Broadband (Fixed Wireless)

Dish (Satellite)

DirectTV (Satellite)

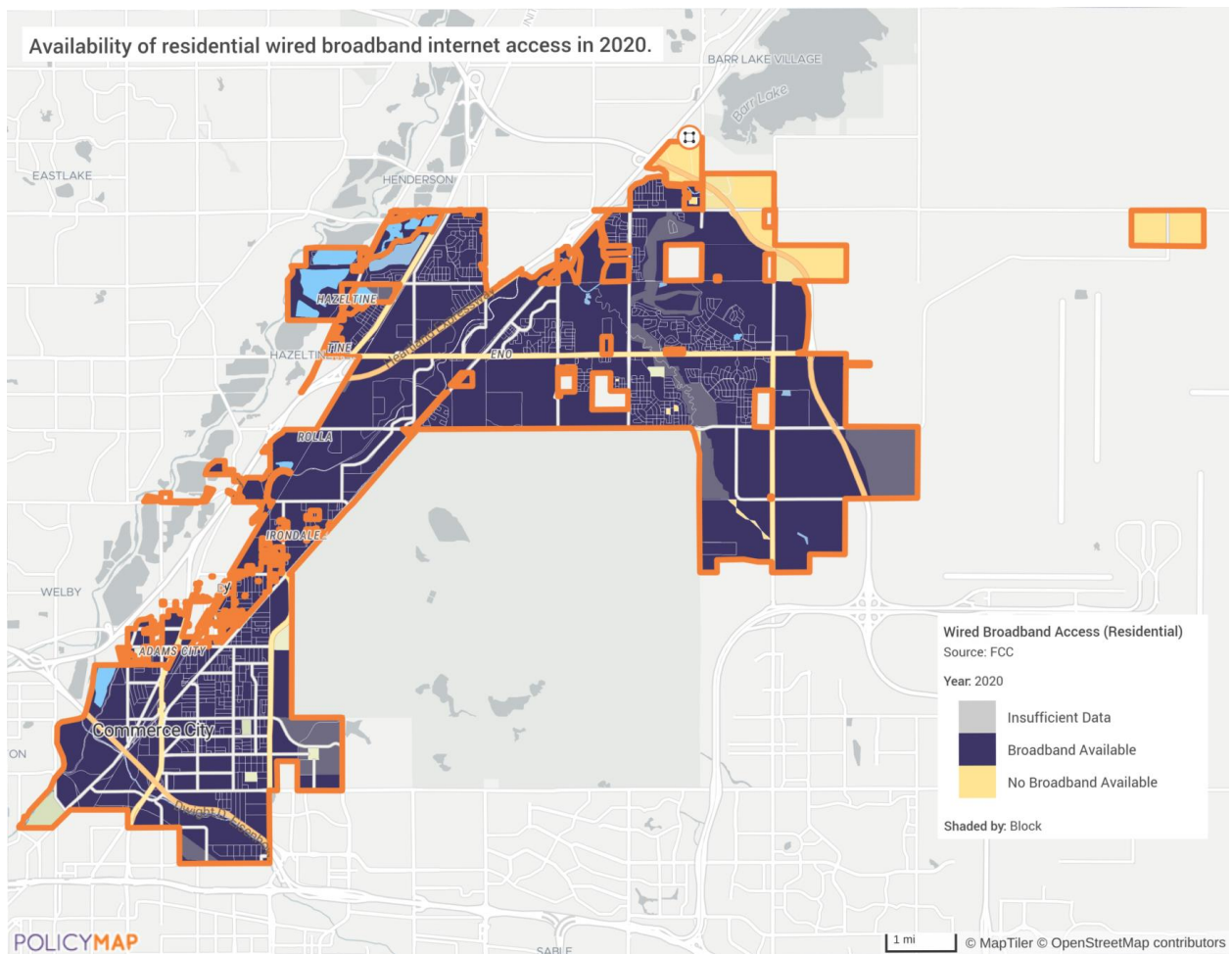
HughesNet (Satellite)

Viasat Internet (Satellite)

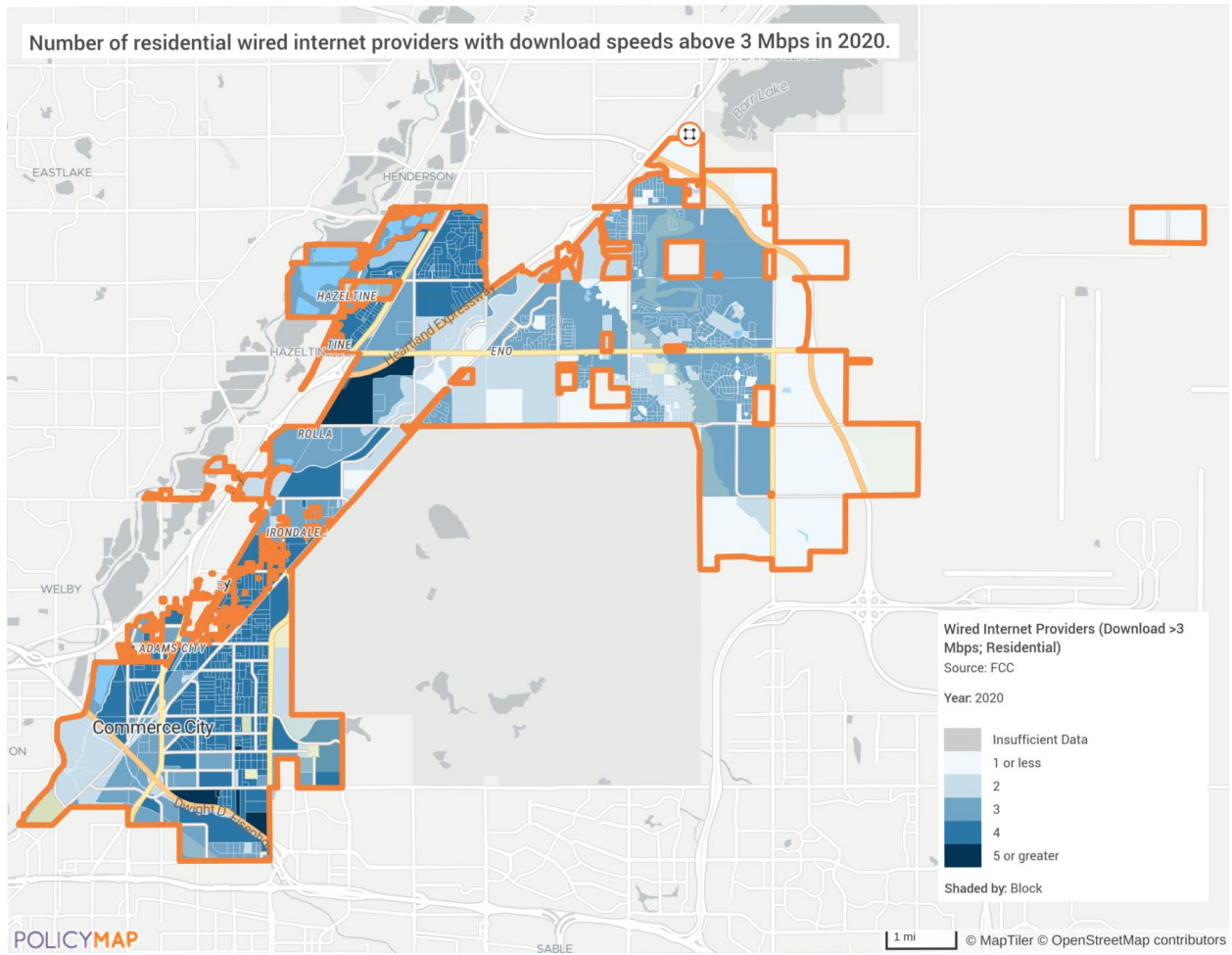
Starlink (Satellite)

The map below shows the number of broadband service providers by census tract. The majority of Commerce City has access to at least three internet providers, with many areas offering up to four high-speed options from competitive providers. This variety ensures that residents have multiple choices for reliable and affordable internet access throughout the city.

See map: Highspeed Internet Providers



Broadband Access



Highspeed Internet Providers

MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)

Describe the jurisdiction's increased natural hazard risks associated with climate change.

Commerce City, CO, has historically faced a variety of natural hazards, including drought, thunderstorms, floods, hail, severe winter storms, tornadoes, and earthquakes, as outlined in the 2023-2028 [City of Commerce City Hazard Mitigation Plan](#) (HMP). Research from this plan highlights that climate change is leading to rising temperatures, shifting precipitation patterns, and intensified extreme weather events in Commerce City. The city has become warmer and drier since 2000. Extreme heat is intensifying, with high 90s and low 100s becoming more common. The hottest recorded temperature in Commerce City was 110°F on August 2, 2008, and in 2020, the area recorded 75 days above 90°F—posing risks to vulnerable populations and critical infrastructure.

Drought remains a serious concern, as reduced snowpack and earlier runoff (by 1–4 weeks) threaten water availability. Flooding is a recurring hazard, with localized street flooding possible during heavy rain exceeding 1.5 inches per hour. While minor urban flooding occurs annually, historical data shows Commerce City has an effectively near 25% annual chance of a flood or flash flood, though most have been minor. Extreme rainfall events (2–3 inches in an hour or 5+ inches in a day) pose the greatest risk for larger floods.

Severe storms, including hail and high winds, continue to cause damage, while wildfire risk is rising as hotter, drier conditions make vegetation more susceptible to ignition. If current trends persist, Commerce City will experience more extreme weather events, requiring stronger mitigation efforts and climate-resilient infrastructure.

According to the FEMA National Risk Index, Adams County, which includes Commerce City, is particularly vulnerable to hazards such as cold waves, hail, lightning, and tornadoes as significant hazards for Commerce City. As the city faces hotter, drier summers, more intense storms, and worsening flood risks, these vulnerabilities highlight the need for proactive mitigation strategies to protect infrastructure and communities.

Although Commerce City is located over 900 miles from the coast, climate change impacts elsewhere—such as rising sea levels and stronger coastal storms—may drive population displacement. A potential influx of climate migrants could put additional pressure on housing, jobs, and essential resources. According to the HMP, Commerce City's population has been growing in recent years, and this trend is expected to continue. While it is uncertain if any of this growth is directly linked to climate change, increasing risks to coastal regions may influence migration patterns, housing demand, and infrastructure capacity.

Addressing climate-related challenges requires proactive planning and resilience-building strategies to mitigate risks and safeguard public health. The Centers for Disease Control and Prevention (CDC) emphasizes that climate change, combined with other environmental and human-induced stressors, exacerbates existing public health threats and introduces new risks, highlighting the need for comprehensive preparedness efforts.

Commerce City, CO, is enhancing resilience to natural hazards through infrastructure upgrades, climate adaptation, fire mitigation, and public engagement. The city has completed major flood control projects, including the Little Dry Creek Regional Detention Facility and McKay Drainageway Detention Facility improvements. To address climate risks, Commerce City is investing in solar energy initiatives and has appointed a Sustainability Officer. Following the 2021 Marshall Fire, the city reviewed fire hazards, promotes NFPA's Firewise principles, and is acquiring a Type III brush truck to improve wildfire response. Efforts to protect water resources include an updated Drought Management Plan and source water protection measures. Public outreach remains a key focus, with emergency preparedness campaigns reaching over 51,000 residents in 2022. Additionally, Commerce City continues to enhance its Emergency Operations Plan and public alert systems to strengthen disaster response. These initiatives collectively improve Commerce City's ability to mitigate risks, respond effectively, and adapt to a changing climate.

Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.

Low- and moderate-income households, whether renting or owning, are particularly vulnerable to climate change and natural disasters due to limited financial resources. Rising electricity and housing costs can push them into unstable living conditions, increasing the risk of homelessness or substandard housing. The 2024 America's Rental Housing Study from Harvard's Joint Center for Housing Studies highlights how escalating insurance premiums and coverage withdrawals in high-risk areas make securing protection against climate-related losses increasingly difficult, while stagnant operating income further limits property owners' ability to invest in climate resilience. The 2021 EPA study on Climate Change and Social Vulnerability reinforces these concerns, revealing that low-income individuals are more likely to live in areas experiencing rising mortality rates from extreme temperatures and face the highest labor hour losses due to weather exposure. Rural communities are especially disadvantaged, often lacking emergency support and resources for climate-related home repairs. As climate threats intensify, strengthening resilience among low- and moderate-income households is essential to ensuring their safety, stability, and long-term well-being.

The HMP acknowledges low- and moderate-income households in Commerce City face heightened vulnerability to natural hazards due to economic constraints, substandard housing conditions, and limited access to resources. The city has a 6.6% poverty rate, with 917 individuals experiencing homelessness daily, and 912 K-12 students meeting the Department of Education's definition of homelessness. Many

low-income residents live in older housing units that may lack proper insulation, making them more susceptible to extreme cold, heat waves, and utility disruptions. Additionally, 191 mobile home units in Commerce City are particularly vulnerable to high winds, hail, and severe storms, which can cause extensive damage due to weaker structural integrity.

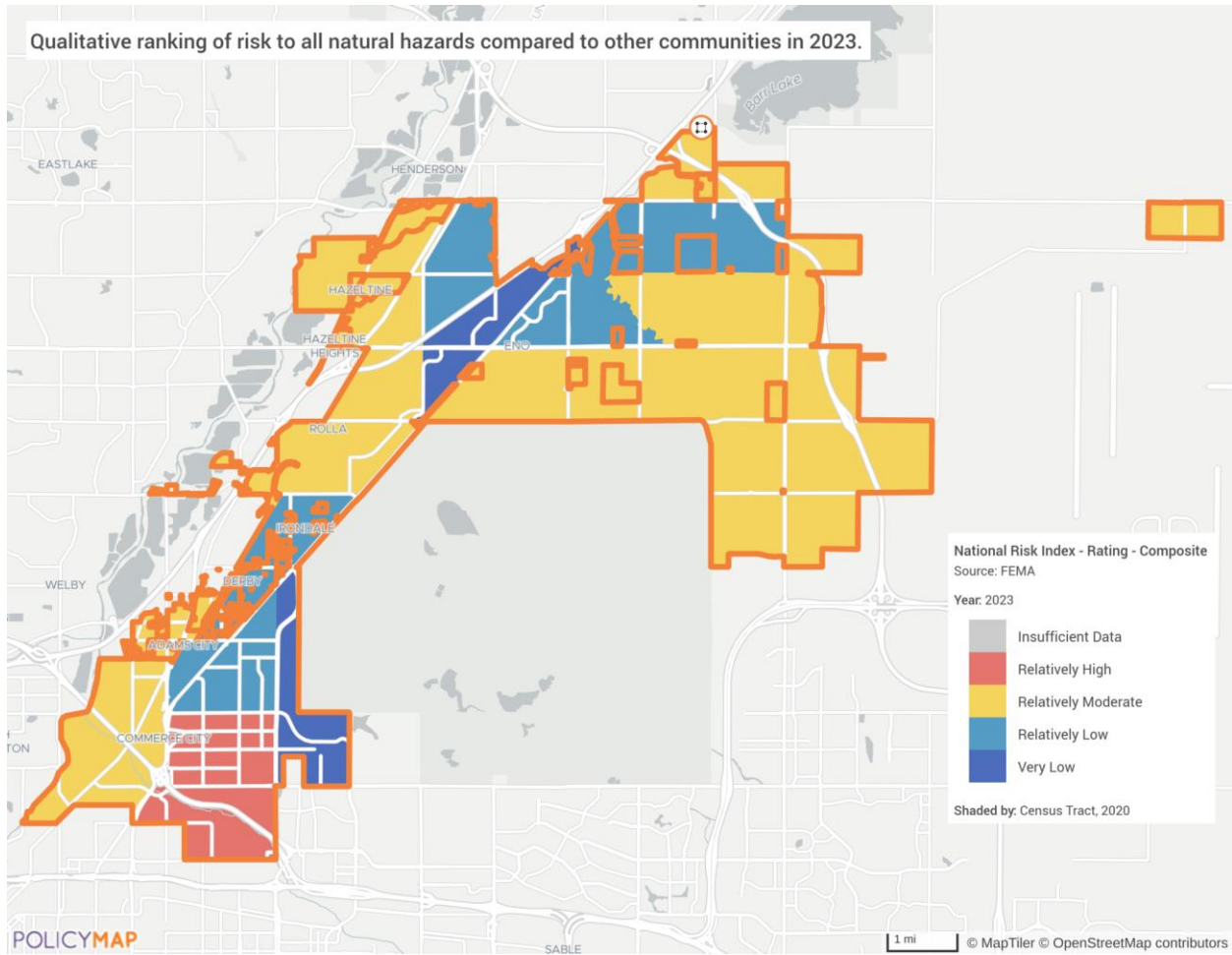
Flooding also poses a risk to economically disadvantaged populations, as lower-income households may have fewer resources to recover from property damage, displacement, or prolonged power outages. Furthermore, emergency preparedness can be more challenging for these residents due to limited financial capacity to invest in mitigation measures, such as flood insurance or home reinforcements. To address these disparities, Commerce City prioritizes inclusive disaster planning, emergency shelter activation during extreme weather, and outreach efforts to ensure vulnerable populations receive necessary support.

FEMA's National Risk Index identifies Adams County as having a relatively high level of community resilience, indicating that its residents have a relatively high ability to prepare for, adapt to, and recover from natural hazards. This assessment encompasses six broad categories: social, economic, community capital, institutional, infrastructural, and environmental factors at the county level. The map below illustrates FEMA's qualitative risk to natural hazards at the census tract level within the city, providing an intuitive way to gauge community risk based on Expected Annual Loss (EAL), Social Vulnerability, and Community Resilience scores.

Risk levels across Commerce City range from relatively high to very low. This variation highlights the need for targeted mitigation efforts to address specific vulnerabilities throughout. These two indexes measure risk from different perspectives—FEMA's risk index evaluates a community's ability to respond to hazards (resilience), while the city's qualitative assessment concentrates on the likelihood and severity of those hazards. This dual approach ensures that resources are allocated where they are most needed, promoting both preparedness and targeted intervention. The city must continue to address these geographic challenges by anticipating, planning, and adapting to the risks associated with climate change and the potential demographic shifts affecting vulnerable communities.

Commerce City prioritizes community education and preparedness for multi-hazard mitigation through an inclusive approach. The city provides timely updates via its Emergency Management website, social media, and the Lookout Alert notification system, which alerts residents to emergencies via phone, text, and email. The Adams County Office of Emergency Management (OEM) coordinates disaster response and recovery, collaborating with local agencies and neighboring counties to share resources and best practices. It oversees emergency operations, training, public education, and preparedness initiatives. Additionally, Colorado Voluntary Organizations Active in Disaster (VOAD) strengthens community resilience through coordinated support. As climate risks grow, continued investment in education, emergency planning, and partnerships will be vital for long-term preparedness.

See map: Risk to All Natural Hazards



Risk to All Natural Hazards

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan outlines the City of Commerce City's housing and community development strategy for the 2025-2029 Consolidated Plan. The plan describes how CDBG funds will be used to achieve HUD's goals of providing a suitable living environment and safe, decent, and affordable housing for low- to moderate-income (LMI) households and special need groups in the City. The City identified priority needs through data analysis and citizen participation involving local nonprofit stakeholder organizations. Addressing these priority needs forms the basis of the five-year Strategic Plan.

The City does not allocate funding based solely on geographic requirements. It will consider investments in both low/mod areas and for eligible individuals and households citywide in its five-year plan. Low/mod areas (LMA) are primarily residential and have at least 51 percent of residents who are considered low- and moderate-income persons as defined by HUD. The boundaries of these areas are defined at the block group tract level. Eligible activities that may have LMA benefits are public improvements such as those to neighborhood facilities, community centers or infrastructure like roads and streets.

The City also provides assistance to low- and moderate-income clientele (individuals) and households (LMC/LMH) who earn 80% of the Area Median Income (AMI) or less. This assistance is provided citywide and is based on eligibility. These benefits are associated with direct services to individuals and families that are not targeted to areas; however, must meet income qualifications in order to be eligible.

The following are the four (4) priority needs and associated goals identified in the Strategic Plan. More details of the priority needs are given in the SP-25 and the goals are detailed in the SP-45.

Priority Need: Public Facilities & Infrastructure

1A Improve Public Facilities & Infrastructure

Priority Need: Public Services

2A Public Services for LMI & Special Need

Priority Need: Affordable Housing

3A Affordable Housing

Priority Need: Planning and Administration

4A Planning and Administration

SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

Geographic Area

Table 4 - Geographic Priority Areas

1	Area Name:	Citywide Low/Mod Eligible
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Comprehensive
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	The Citywide Low/Mod Areas (LMA) in Commerce City are block group tracts where at least 51 percent of the residents are low- and moderate-income persons. The City also provides assistance to low- and moderate-income clientele (individuals) and households (LMC/LMH) who earn 80% of the Area Median Income (AMI) or less. This assistance is provided citywide and is based on eligibility. These benefits are associated with direct services to individuals and families that are not targeted to areas; however, must meet income qualifications in order to be eligible.
	Include specific housing and commercial characteristics of this target area.	The population of Commerce City has been growing rapidly in the past decade (36.8%), and to meet this need the number of housing units have also increased. While a large portion of housing is new, there are still a number of older units in need of repair or improvement. An estimated 16% of all owner-occupied units and 39% of renter-occupied were built before 1980 (Source: 2019-2023 ACS). Naturally, older housing units may have higher maintenance needs, and a greater risk of lead-based paint hazards.

<p>How did your consultation and citizen participation process help you to identify this neighborhood as a target area?</p>	<p>As part of the plan development process, Commerce City held a public hearing and provided a public comment period to give citizens the chance to review and comment on the plan.</p> <p>Additionally, the City consulted with local community stakeholders to identify housing and community development needs. These needs were determined through meetings with nonprofits, local government offices, and citizens throughout the city. Finally, a community survey was also made available online for public input.</p> <p>Additionally, as reported in the NA-50 consultation with the Community Well-Being Division has highlighted a need for support for homeless populations in Commerce City.</p>
<p>Identify the needs in this target area.</p>	<p>Affordable housing development and preservation are some of the highest needs in Commerce City. Cost burden is the biggest housing issues in the City, which disproportionally affects LMI households. The most recent ACS data also shows that over a third of rental housing is very old.</p> <p>Public facilities and infrastructure improvement activities are a priority need in the City. These activities are necessary for neighborhood revitalization efforts in low- to moderate-income areas, in particular the core downtown areas of Commerce City. Additionally, the need for these public improvements has been identified through the City's 2045 Comprehensive Plan efforts and community engagement processes. The city's comprehensive plan outlines goals to ensure adequate and efficient public facilities and infrastructure for current and future residents and businesses.</p> <p>There is a need for public services that address, LMI, special needs groups, and the homelessness in the City. Vulnerable groups are those already experiencing homelessness, housing insecurity, or are in need of crisis intervention.</p>
<p>What are the opportunities for improvement in this target area?</p>	<p>Affordable housing activities such as housing rehab will increase and maintain the affordable housing stock for LMI households in the City.</p> <p>Public facilities and infrastructure improvement activities will improve and revitalize neighborhoods and increase other public and private investments into these areas.</p> <p>Public services will help improve the quality of life for LMI residents and promote stable housing.</p>

Are there barriers to improvement in this target area?	Access to funding is a barrier to improvements in the City of Commerce City.
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General Allocation Priorities

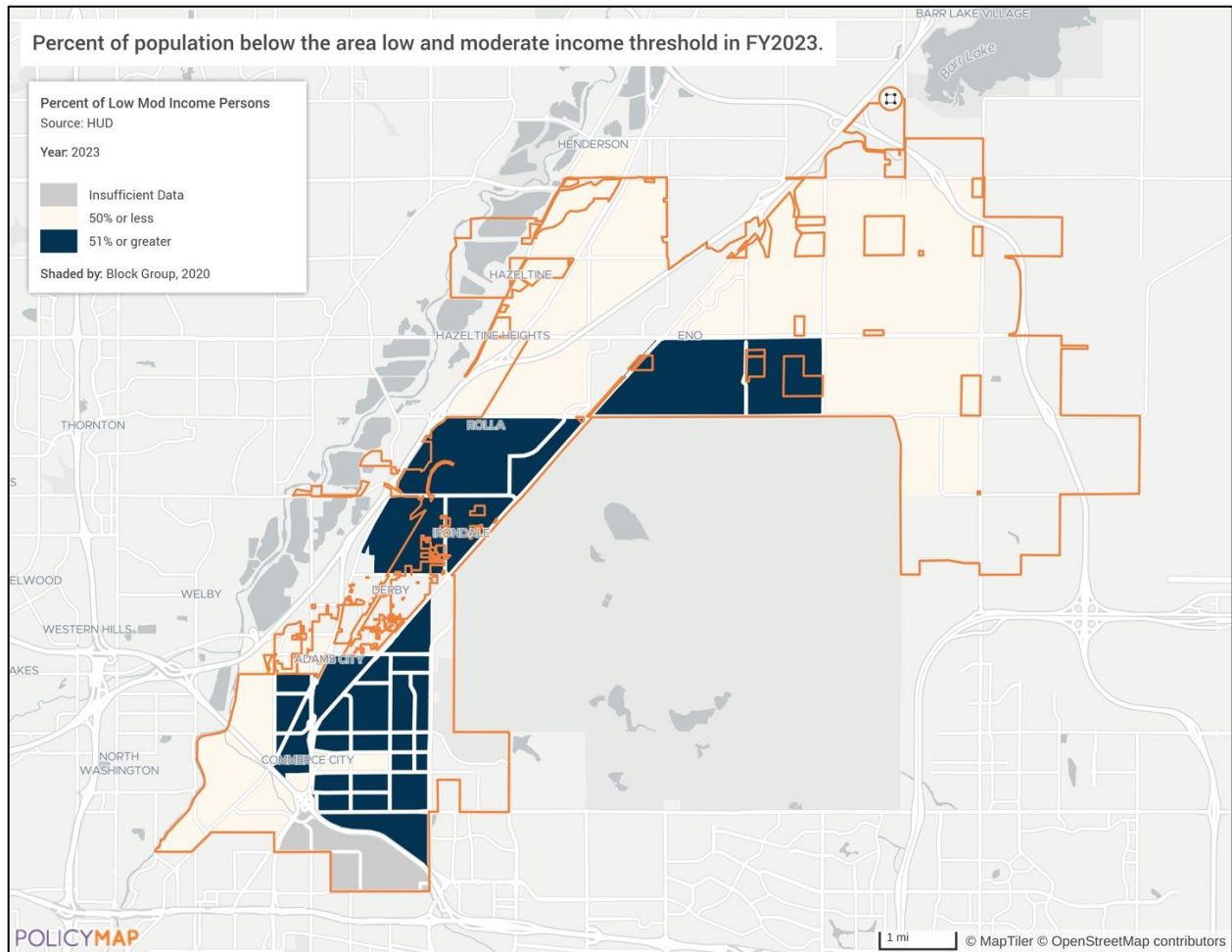
Describe the basis for allocating investments geographically within the jurisdiction.

The City of Commerce City does not necessarily target funds geographically; however funds must serve low- and moderate-income individuals and families, or be directed towards neighborhoods with a prominent low/mod income population.

Direct services such as public services and affordable housing rehab benefits are based on household income eligibility rather than area benefit. For example, when planned activities are intended to serve individuals or households directly, beneficiaries must meet income qualifications, as well as residency requirements (residing within the City), in order to receive assistance from the program. These benefits are defined for individuals as low/mod clientele (LMC), or for households as low/mod households (LMH). City staff and/or one of its subrecipient agencies will complete an application and determine eligibility of the applicant before the activity is initiated.

Public facility and infrastructure improvement activities will serve a community or neighborhood. These activities are said to have an “area-wide” benefit. Per HUD requirements, these areas must be within an eligible Low/Mod Block Group Tract, as defined by HUD-CDBG regulations, whereby the majority of the residents are low- to moderate-income (or 51%). This objective is defined by HUD as a low/mod area (LMA) benefit.

To determine LMI tracts the City utilizes HUD’s CDBG Low Mod Income Summary Data (LMISD) from the HUD Exchange website, which has defined the eligible block group tracts within the jurisdiction. The tracts can be at: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>.



FY 2023 Low Mod BG Tracts (HUD LMISD)

SP-25 Priority Needs - 91.415, 91.215(a)(2)

Priority Needs

Table 5 – Priority Needs Summary

1	Priority Need Name	Public Facilities & Infrastructure
	Priority Level	High
	Population	Extremely Low Low Moderate Non-housing Community Development
	Geographic Areas Affected	Citywide Low/Mod Eligible
	Associated Goals	1A Improve Public Facilities & Infrastructure
	Description	There is a need to improve public facilities and infrastructure in low/mod areas of Commerce City. As reported in the NA-50, Commerce City has identified critical needs in its public facilities to support its growing population and enhance residents' quality of life. Identified public facility improvements include the need for improvements to the parks and trail system in the city. Other identified need for public facilities includes improvements to existing public facilities such as the library, community centers, and health clinics in the City. Additionally, aging infrastructure in the most historic areas of the City need essential updates, such as street repaving, sidewalk improvements, lighting upgrades, and more.
	Basis for Relative Priority	Through community participation and consultation of local stakeholders the need for public facilities & infrastructure Improvements was identified. The basis is to improve accessibility for all residents and create a suitable living environment.
2	Priority Need Name	Public Services
	Priority Level	High

	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	Citywide Low/Mod Eligible
	Associated Goals	2A Public Services for LMI & Special Need
	Description	There is a need for public services that addresses the needs of LMI, special needs persons, and homeless needs in Commerce City. As reported in the NA-50, Commerce City has long recognized the importance of bolstering public services to support its vulnerable populations. The establishment of the Community Well-Being Division exemplifies this commitment, focusing on coordinating services related to housing, health, and food insecurities. This division aims to develop programs and initiatives that address poverty, homelessness, and neighborhood equity, ensuring that all residents have access to essential services and support. The City is also in need of support for youth programs, senior programs, and essential food services. The MA-45 also reports that expanding workforce training, recruitment, and upskilling programs is critical to meeting employer needs and improving economic sustainability in Commerce City.
	Basis for Relative Priority	Through community participation and consultation of stakeholder nonprofit organizations the need for public services for LMI and special need groups were identified. The basis for this need is to provide access to services and sustainability for LMI residents.
3	Priority Need Name	Affordable Housing
	Priority Level	High

	Population	Extremely Low Low Moderate Families with Children Elderly
	Geographic Areas Affected	Citywide Low/Mod Eligible
	Associated Goals	3A Affordable Housing
	Description	The development and preservation of affordable housing is a priority need for low- to-moderate income (LMI) households in Commerce City. Housing cost burden is by far the largest housing problem in the City. According to the 2019-2023 ACS data, 27.8% of homeowners with a mortgage and 56.8% of renters are cost burdened (paying more than 30% of income towards housing costs). There is also a need for housing rehabilitation and repairs to maintain the affordable housing stock in the City.
	Basis for Relative Priority	Through community participation and consultation of local stakeholder the need to preserve & develop affordable housing was identified. The basis is to create or maintain affordable housing for LMI residents in Commerce City.
	4	
	Priority Need Name	Planning and Administration
	Priority Level	High
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	Citywide Low/Mod Eligible
	Associated Goals	4A Planning and Administration
	Description	Effective program management will include general administration and planning of the CDBG grant program, monitoring subrecipients, reporting and managing grant financials. Planning involves the development of AAPs, annual reports, and meeting citizen participation requirements.
	Basis for Relative Priority	There is a need to provide effective management of the CDBG grant program that will ensure compliance and regulation of the grant. Effective program administration ensures that the City meets the established objectives in the plan.

SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

Introduction

The City of Commerce City is designated as an “entitlement community” by the United States Department of Housing and Urban Development (HUD) and receives Community Development Block Grant (CDBG) funding based on an annual formula. These grant funds support activities that preserve affordable housing, improve public facilities and infrastructure, and provide supportive services for low- to moderate-income and special need persons. PY 2025 is the first program year of the Five-Year 2025-2029 Consolidated Plan, and the City anticipates it will receive \$469,128 for its CDBG program. The City also expects to receive similar allocation amounts in each year of the Consolidated Plan period.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Admin and Planning Housing Public Improvements Public Services	469,128	0	0	469,128	1,876,512	PY 2025 is the first program year of the ConPlan. The expected amount available remainder of the ConPlan is 4x years of the annual allocation.

Table 6 - Anticipated Resources

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

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

The City is a member of the Adams County HOME Consortium and receives HOME Investment Partnerships funds through the HOME Consortium. HOME funds have a 25% matching requirement, and each HOME dollar spent is matched with 25% of general funds for projects within the program year. HOME funds are not entered in the table above as a resource as the HOME Consortium is the direct recipient of those funds and are ultimately responsible for the planning and reporting of HOME funds for the Consortium.

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

The City does not anticipate using publicly owned land or property to address the needs identified in this plan except in the area of public facilities. Future land purchases 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.

SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
CITY OF COMMERCE CITY	Government	Non-homeless special needs Planning neighborhood improvements public facilities	Jurisdiction
Adams County Community and Economic Development	Government	Planning neighborhood improvements public facilities	Region
Commerce City Housing Authority	PHA	Public Housing Rental	Jurisdiction
Metro Denver Homeless Initiative	Continuum of Care	Homelessness Planning public services	Region
BROTHERS REDEVELOPMENT INC	Developer	Owner Renter Non-homeless special needs	Jurisdiction
Rebuilding Together Colorado	Nonprofit	Owner Renter	Jurisdiction
A Precious Child	Nonprofit	Homelessness public services	Jurisdiction

Table 7 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The City of Commerce City has a strong housing and community development delivery system. While the City is primarily responsible for administering the CDBG Program, it also participates in the Metropolitan Denver Continuum of Care (CoC) led by the Metro Denver Homeless Initiative. The CoC is the lead regional agency working to end homelessness in the area and submits a consolidated application to the U.S. Department of Housing and Urban Development to support programs that help the City and region's homeless population. Various public agencies, for-profit entities, and non-profit organizations all contribute to providing housing, community development, homeless, and other public services throughout the City.

Affordable housing needs are addressed through the City's network of housing providers that operate to preserve housing for low- to moderate-income households and special needs groups such as the elderly and persons with a disability. These agencies, nonprofits and housing developers include the Commerce City Housing Authority, Brother's Redevelopment, and Rebuilding Together Colorado etc.

Although the City has a supportive network of agencies providing essential services to low and moderate-income residents of Commerce City, the City has identified gaps in the institutional delivery system due to lack of resources.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	
Mortgage Assistance			
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X		
Mobile Clinics	X		
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	
Other			
Other			

Table 8 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The City of Commerce City participates in the Metropolitan Denver Continuum of Care (CoC) led by the Metro Denver Homeless Initiative. The Metro Denver Homeless Initiative is a regional system that coordinates services and housing for people experiencing homelessness, including street outreach, emergency shelter, transitional housing, rapid rehousing, prevention and diversion, and permanent supportive housing. The City participates the CoC meetings and initiatives, and as such the City has an opportunity to provide input regarding the use of CoC ESG funds, performance standards and outcome evaluation, and Homeless Management Information System (HMIS) administration.

Although the City of Commerce City does not receive Emergency Solutions Grant (ESG) funds, the City will consider projects that address homeless needs for CDBG funding. Additionally, the City may provide support to or collaborate with local homeless housing and service providers through grants it makes to organizations that participate in the Metro Denver Homeless Initiative.

The Metro Denver Homeless Initiative leads the Coordinated Entry System (CES), which helps to ensure that people 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.

The CDBG office also consults with the Commerce City Housing Authority, Almost Home, and other local housing and service providers to assess the current needs of homeless persons and persons at risk of homelessness in Commerce City. Funding applications to the City's CDBG program are encouraged.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The strength of the service delivery system lies in the large and varied network of nonprofit organizations and service providers in Commerce City. There is a wide range of services aimed at meeting the needs of special needs populations such as the elderly, persons with a disability, and those at-risk or experiencing homelessness. Across the City there are services available for these populations. The care network for individuals experiencing homelessness is coordinated through the Metropolitan Denver Continuum of Care, which uses coordinated entry to connect households with available services throughout the region.

Often times the demand for services surpasses their availability. The gaps in the system are mainly due to the lack of affordable housing, housing cost burden, and limited employment opportunities for low-income and homeless individuals. However, the largest gap in the service delivery system is a lack of resources to implement programs and services that can meet all the needs of the homeless and special needs population. The requests for assistance often exceed the available funds offered by the City's CDBG grant.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

Commerce City will overcome any gaps in the institutional delivery structure through continued collaboration with local housing and community development service providers, members of the CoC, and members of the HOME Consortium. The City will continue to work closely with state and local agencies and governments, nonprofit organizations, and other service providers to coordinate the delivery of services to City residents.

Each year, the CDBG Office provides community outreach and CDBG education; develops and reviews project applications; prepares the AAP and year-end CAPER; and prepares individual project RFPs,

contracts, and agreements. The CDBG Office provides grant recipients with technical assistance, guidance, financial management advice, and oversight; reviews project spending; and prepares financial drawdowns from HUD. Once each project is ready to proceed, the CDBG Office enforces compliance with labor laws, Section 3, fair housing and equal opportunity laws, 2 CFR 200, and the Uniform Relocation Act. Additional reporting, tracking, training, and general administrative duties are performed. All these activities help to reinforce and build capacity amount service providers in Commerce City, and will help the City to address all the priority needs identified by the community.

SP-45 Goals - 91.415, 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	1A Improve Public Facilities & Infrastructure	2025	2029	Non-Housing Community Development	Citywide Low/Mod Eligible	Public Facilities & Infrastructure	CDBG: \$1,218,491	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15000 Persons Assisted
2	2A Public Services for LMI & Special Need	2025	2029	Non-Housing Community Development	Citywide Low/Mod Eligible	Public Services	CDBG: \$351,846	Public service activities other than Low/Moderate Income Housing Benefit: 2500 Persons Assisted
3	3A Affordable Housing	2026	2029	Affordable Housing	Citywide Low/Mod Eligible	Affordable Housing	CDBG: \$400,000	Homeowner Housing Rehabilitated: 800 Household Housing Unit
4	4A Planning and Administration	2026	2029	Non-Housing Community Development	Citywide Low/Mod Eligible	Planning and Administration	CDBG: \$375,302	Other: 4

Table 9 – Goals Summary

Goal Descriptions

1	Goal Name	1A Improve Public Facilities & Infrastructure
	Goal Description	The City has a goal to improve access to public facilities in low/mod areas, such as neighborhood facilities, community centers and parks and recreation facilities. The City will also expand and improve public infrastructure in low/mod areas, including activities such as improvements to streets and sidewalks.
2	Goal Name	2A Public Services for LMI & Special Need
	Goal Description	The City has a goal to provide public services to stabilize low- and moderate-income individuals and households and/or those with non-homeless special needs and increase their access to opportunity.
3	Goal Name	3A Affordable Housing
	Goal Description	The City has a goal to support housing rehabilitation programs that improve living conditions for LMI households through emergency repairs, minor repairs, ADA modifications and exterior improvements to housing units.
4	Goal Name	4A Planning and Administration
	Goal Description	Effective program management of the CDBG grant program will ensure compliance with grant regulations and that the program activities meet their established objectives. Planning will involve the development of annual action plans, reports, fair housing outreach and citizen participation requirements.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

With CDBG funds, the City of Commerce City estimates that over the next five years of the Consolidated Plan the City will assist LMI households with affordable housing activities:

Homeowner Housing Rehabilitated: 80 Household Housing Unit

SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

According to 2019-2023 American Community Survey (ACS) five-year estimates data, an estimated 3,385 owner-occupied housing units and 1,826 renter-occupied units were built before 1980. That amounts to an estimated 15.9% of homeowner housing and 38.9% of renter. Housing units built before 1980, which represents a significant number of homes with the potential of LBP hazards.

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

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

How are the actions listed above integrated into housing policies and procedures?

Commerce City follows strict HUD guidelines for testing and abatement of lead-based paint and other hazardous substances and requires compliance from its contractors and subcontractors. Any structure built before 1978 that is proposed for rehabilitation under federal programs, is tested for lead-based paint. Notices and requirements regarding testing and removal of lead-based paint are provided to program participants, contractors and project sponsors. The City's service provider has licensed contractors who are available to perform appropriate abatement and/or removal procedures if lead-based paint is present.

SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

According to ACS data, the median income in Commerce City has increased by 59% over the past decade. However, the wealth gap continues to widen, making it necessary for the City and local community development agencies and service providers to work harder to ensure a comprehensive anti-poverty strategy. The City collaborates across local government departments and with nonprofits to reduce poverty and help individuals become self-sufficient, thereby reducing the likelihood of returning to poverty over time.

Several strategies and resources outlined in the MA-45 describe the implications for workforce development, business support and infrastructure developments that will help improve the economic sustainability of residents in Commerce City. These strategic investments and initiatives are set to bolster Commerce City's economic landscape, fostering job creation, business growth, and sustainable development well into the future. By prioritizing workforce training, business support, and infrastructure expansion, Commerce City is positioning itself as a resilient and business-friendly environment for long-term prosperity.

The City's CDBG funded programs will target LMI individuals and households, and activities intended to benefit communities and neighborhoods will target only low/mod areas as defined by HUD's Low/Mod Summary Income Data (see more details on HUD LMISD data in the SP-10).

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

The City has created four (4) goals to address identified priority needs that work to reduce poverty in Commerce City. These goals are affordable housing; public services for LMI and special needs; improvements to public facilities and infrastructure; and the effective management of the CDBG program. For more details, see the SP-45 Goals.

SP-80 Monitoring - 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use 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.

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

Annual Action Plan

AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

Introduction

The City of Commerce City is designated as an “entitlement community” by the United States Department of Housing and Urban Development (HUD) and receives Community Development Block Grant (CDBG) funding based on an annual formula. These grant funds support activities that preserve affordable housing, improve public facilities and infrastructure, and provide supportive services for low- to moderate-income and special need persons. PY 2025 is the first program year of the Five-Year 2025-2029 Consolidated Plan, and the City anticipates it will receive \$469,128 for its CDBG program. The City also expects to receive similar allocation amounts in each year of the Consolidated Plan period.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Admin and Planning Housing Public Improvements Public Services	469,128	0	0	469,128	1,876,512	PY 2025 is the first program year of the ConPlan. The expected amount available remainder of the ConPlan is 4x years of the annual allocation.

Table 10 - Anticipated Resources

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

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

The City is a member of the Adams County HOME Consortium, and receives HOME Investment Partnerships funds through the HOME Consortium. HOME funds have a 25% matching requirement, and each HOME dollar spent is matched with 25% of general funds for projects within the program year. HOME funds are not entered in the table above as a resource as the HOME Consortium is the direct recipient of those funds and are ultimately responsible for the planning and reporting of HOME funds for the Consortium.

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

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

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	1A Improve Public Facilities & Infrastructure	2025	2029	Non-Housing Community Development	Citywide Low/Mod Eligible	Public Facilities & Infrastructure	CDBG: \$398,759	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3000 Persons Assisted
2	2A Public Services for LMI & Special Need	2025	2029	Non-Housing Community Development	Citywide Low/Mod Eligible	Public Services	CDBG: \$70,369	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted

Table 11 – Goals Summary

Goal Descriptions

1	Goal Name	1A Improve Public Facilities & Infrastructure
	Goal Description	The City has a goal to improve access to public facilities in low/mod areas, such as neighborhood facilities, community centers and parks and recreation facilities. The City will also expand and improve public infrastructure in low/mod areas, including activities such as improvements to streets and sidewalks.
2	Goal Name	2A Public Services for LMI & Special Need
	Goal Description	The City has a goal to provide public services to stabilize low- and moderate-income individuals and households and/or those with non-homeless special needs and increase their access to opportunity.

AP-35 Projects - 91.420, 91.220(d)

Introduction

PY 2025 AAP projects will address the housing and community development needs and goals as identified in the strategic plan. These include public services and public facilities and infrastructure improvements. The City has elected not to fund housing rehab and admin in PY 2025. Usually, CDBG funds have a max 20% cap for admin costs when it is funded. There is a 15% cap for public service activities.

Projects

#	Project Name
1	CDBG: Public Services (2025)
2	CDBG: Public Facilities & Infrastructure (2025)

Table 12 – Project Information

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

Commerce City has identified four (4) priority needs that will be funded in the Consolidated Plan. All projects listed will help address a priority need identified in the Consolidated Plan. During the public participation process, public services were identified as one of the highest needs in the City. The demand for funding among local organizations has so far exceeded the amount of available funding, and partly due to this, the City's internal team of CDBG advisors rated public services a high-priority need. However, for CDBG, there is a 15% grant cap on the total allocation that can be used to fund public services. Eligible persons must be LMI, and activities will focus on providing services for individuals and families at-risk of homelessness.

The preservation and development of affordable housing was identified as one the highest needs in the City. Housing cost burden is the biggest housing problem in the City, in particular for low-income households. These will encompass activities such as homeowner housing rehab, rental housing rehab, and relocation services for households impacted by these developments.

Public Infrastructure & Facilities Improvements are a priority. Eligible project proposals that benefit Low/Mod income areas in the City such as streets, sidewalks, parks and community centers will be considered for funding.

The major obstacle the City faces is the general lack of funds to address all priority needs in each annual plan. The City will continue to explore additional funding opportunities through leveraging the resources it currently has. While the City recognizes several important needs, due to the lack of funds, the City may not fund all needs in every year of the 5-year planning period. The City has elected not to fund housing rehab and admin in PY 2025.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG: Public Services (2025)
	Target Area	Citywide Low/Mod Eligible
	Goals Supported	2A Public Services for LMI & Special Need
	Needs Addressed	Public Services
	Funding	CDBG: \$70,369
	Description	Public services that will target and benefit low- to moderate-income households and special needs groups such as persons at-risk or experiencing homelessness. The total amount allocated to public services may not exceed 15% of the total grant award.
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
	Location Description	Citywide, low/mod eligible.
	Planned Activities	Planned activities may include homeless services and programs (03T).
2	Project Name	CDBG: Public Facilities & Infrastructure (2025)
	Target Area	Citywide Low/Mod Eligible
	Goals Supported	1A Improve Public Facilities & Infrastructure
	Needs Addressed	Public Facilities & Infrastructure
	Funding	CDBG: \$398,759
	Description	The City will fund public facility and infrastructure improvements in low/mod areas. Funding may also be provided for public facilities that serve special needs groups such as the elderly, persons with a disability and the homeless.
	Target Date	9/30/2026
	Estimate the number and type of families that will benefit from the proposed activities	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 3,000 Persons Assisted
	Location Description	Citywide low/mod areas, low/mod eligible.

	Planned Activities	Planned activities may include improvements to streets (03K) and sidewalks (03L).
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AP-50 Geographic Distribution - 91.420, 91.220(f)

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

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

Commerce City's industrial economy depends on the City's rich transportation connectivity with Denver International Airport; federal and state limited access expressways including I-70, I-76, I-270, E-470, US6, US85, CO2, CO44, CO224, and CO265; plus, three active railroad lines, the new N Line commuter train, a river, and a large creek. As these features cut through and around the City they create separated pocket neighborhoods. The historic City area contains most of these older pocket neighborhoods and comprises the highest percentages of LMI individuals, minorities, older homes, and infrastructure in need of rehab.

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

Geographic Distribution

Target Area	Percentage of Funds
Citywide Low/Mod Eligible	100

Table 13 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

As noted above, the City of Commerce City does not necessarily target funds geographically; however funds must meet LMA, LMH or LMA objectives.

Direct services such as public services (LMC) and affordable housing rehab benefits (LMH) are based on household income eligibility rather than area benefit. For these activities, City staff and/or one of its subrecipients will complete an application and determine eligibility before the activity is initiated.

Certain activities such as public facility and infrastructure improvements may serve a low/mod neighborhood or area (LMA), and have an "area-wide" benefit. Per HUD requirements, these areas must be within an eligible Low/Mod Block Group Tract, as defined by HUD-CDBG regulations, whereby the majority of the residents are low- to moderate-income (or 51%). Public facilities improvements, such as

those to senior centers and homeless shelters may also target special need groups such as the elderly or the homeless, and these will be designated as LMC objectives.

To determine LMI tracts the City utilizes HUD's CDBG Low Mod Income Summary Data (LMISD) from the HUD Exchange website, which has defined the eligible block group tracts within the jurisdiction. The tracts can be at: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>.

Discussion

Race/Ethnic Minority Concentration

A "racial or ethnic concentration" is any census tract where a racial or ethnic minority group makes up 10% or more of that group's citywide percentage. Data was taken from the 2019-2023 ACS 5-Year estimates. Due to the small sample size, only racial or ethnic groups that make up at least 1% of the City's population were analyzed.

Black or African American, non-Hispanic: This group makes up 4.4% of the citywide population, and a census tract is considered a concentration if 14.4% of the population is part of this racial group. There are no census tracts with a concentration.

Asian, non-Hispanic: Approximately 2.4% of the City population identifies as Asian. A census tract is considered a concentration if 12.4% of the population is part of this racial group. There are no census tracts with a concentration.

Hispanic: Hispanics make up 48.3% of the City's population, and a census tract is considered a concentration if 58.3% of the population is part of this racial group. Six (6) tracts have a concentration: 08001008705, 08001008706, 08001008709, 08001008801, 08001008802, and 08001008901. These tracts are located in the Core City.

Low-Income Households Concentration

A "low-income concentration" is any census tract where the median household income (MHI) is 80% or less than the MHI for the City of Commerce City. According to the 2019-2023 ACS 5-Year Estimates, the MHI in Commerce City is \$106,756. A tract is considered to have a low-income concentration if the MHI is \$85,405 or less. There are five (5) tracts with a concentration of low-income households: 08001008705, 08001008706, 08001008709, 08001008801, and 08001008802. These tracts also have a concentration of Hispanic persons and are located in the Core City. For a map displaying a concentration of low/mod households, see the MA-50.

AP-85 Other Actions - 91.420, 91.220(k)

Introduction

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

Actions planned to address obstacles to meeting underserved needs

Residents and stakeholders who participated in the ConPlan process noted several underserved needs in Commerce City, including affordable housing, housing and services for homeless populations, and public facilities and services. Obstacles to meeting underserved needs include:

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

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

- Leveraging membership in the Adams County HOME Consortium to provide additional affordable housing;
- Providing basic services for people experiencing or at risk of homelessness and low-income residents of Commerce City;

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

Actions planned to foster and maintain affordable housing

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

Commerce City joined the Adams County HOME Consortium for a three-year term beginning with the 2022 program year. The objectives of the HOME program are to ensure long-term affordability of housing

and to target assistance to households with less than 80% of the area median income. Eligible activities include homeowner rehabilitation, repair, and reconstruction; homebuyer activities such as acquisition, rehabilitation, new construction, and down payment assistance; rental housing acquisition, rehabilitation, and new construction; and rental assistance.

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

Projects to increase housing affordability in the 2024 program year include:

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

Actions planned to reduce lead-based paint hazards

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

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

Actions planned to reduce the number of poverty-level families

The City of Commerce City's anti-poverty strategy focuses on helping all low-income households improve their economic status and remain above the poverty level. The activities outlined in this plan are designed to directly reduce the number of households living below the poverty line in Commerce City. The City will continue to collaborate with nonprofits, the Continuum of Care, and other cities to collectively address poverty. The City will provide funding to agencies that offer support to individuals with low and moderate incomes, especially those experiencing homelessness. This support includes basic services such as food, clothing, essential medical care, job training, and employment support, as well as case management

services.

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

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

Actions planned to develop institutional structure

The City will continue to work within existing partnerships and coalitions, such as the Continuum of Care, to work toward meeting local housing and service needs. The City of Commerce City will continue to work closely with state and local agencies and governments, nonprofit organizations, and other service providers to coordinate the delivery of services to city residents.

Each year, the CDBG Office provides community outreach and CDBG education; develops and reviews project applications; prepares the AAP and year-end CAPER; and prepares individual project RFPs, contracts, and agreements. The CDBG Office provides grant recipients with technical assistance, guidance, financial management advice, and oversight; reviews project spending; and prepares financial drawdowns from HUD. Once each project is ready to proceed, the CDBG Office enforces compliance with labor laws, Section 3, fair housing and equal opportunity laws, 2 CFR 200, and the Uniform Relocation Act. Additional reporting, tracking, training, and general administrative duties are performed.

The CDBG Office works closely with the City's Community Development Department and with Adams County's Community Development Department as a member of the Adams County HOME Consortium.

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

The City of Commerce City will continue to be an active participant in the Metro Denver Homeless Initiative. The Continuum of Care brings together nonprofit, government, and business leaders to provide

a shared approach to the goal of ending homelessness. Membership includes emergency, transitional, and permanent housing providers, nonprofit social service organizations, and government agencies.

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

Program Specific Requirements

AP-90 Program Specific Requirements - 91.420, 91.220(l)(1,2,4)

Introduction

The estimated percentage of CDBG funds used for activities benefiting persons of low- and moderate-income over the one-year period covered by the 2025 Annual Action Plan is 100%. The City does not expect to generate any program income through its program activities.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(1)

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

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

Other CDBG Requirements

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