



City of Commerce City, Colorado

Community Development Block Grant

2024 Annual Action Plan Substantial Amendment (Remove Section 108)

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

Table of Contents

Executive Summary	
3	
AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)	3

PR-05 Lead & Responsible Agencies – 91.200(b)	9
AP-10 Consultation – 91.100, 91.200(b), 91.215(l)	10
AP-12 Participation – 91.105, 91.200(c)	19
Expected Resources	25
AP-15 Expected Resources – 91.220(c)(1,2)	25
Annual Goals and Objectives	27
AP-20 Annual Goals and Objectives	27
Projects	29
AP-35 Projects – 91.220(d)	29
AP-38 Project Summary	31
AP-50 Geographic Distribution – 91.220(f)	33
Affordable Housing	35
AP-55 Affordable Housing – 91.220(g)	35
AP-60 Public Housing – 91.220(h)	36
AP-65 Homeless and Other Special Needs Activities – 91.220(i)	38
AP-75 Barriers to affordable housing – 91.220(j)	40
AP-85 Other Actions – 91.220(k)	42
Program Specific Requirements	46
AP-90 Program Specific Requirements – 91.220(l)(1,2,4)	46

Executive Summary

AP-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.

The AAP represents a cooperative effort between the City of Commerce City, its residents, area businesses, and non-profits serving the Commerce City area. It outlines the City's needs, goals, and strategies for the program year (PY) 2024 AAP funding year and provides information on how citizens were involved in the process. The projects developed in this plan target a wide range of issues, which include affordable housing, quality of life issues, crime prevention, neighborhood revitalization, and helping seniors maintain their homes. PY 2024 will start on October 1, 2024, and end on September 30, 2025.

In PY 2022, the City of Commerce City joined the Adams County HOME Consortium, making the City eligible to receive HOME funds through the County to address affordable housing needs for its LMI residents. The City has aligned its Consolidated Plan period from 2021-2025 to 2020-2024 to match with Adams County's Consolidated Plan and will now have a cycle that ends on PY 2024. HOME is administered by Adams County, and as the responsible lead entity, the County will be the direct recipient and report on HOME funds.

Substantial Amendment

The City originally intended to utilize the Section 108 Loan program to finance multiple CDBG-eligible public facility and infrastructure projects over several years in the original 2024 AAP submission. Proposed activities included street and sidewalk improvements in low/mod areas of the Core City. The planned loan amount was \$1,918,135, which will now be removed from the plan. The City also included a planned repayment amount of \$306,637, which will now be reallocated towards public facility and infrastructure improvements. The following sections were amended:

AP-05: A summary and citizen participation efforts for the substantial amendment has been included.

AP-12: Citizen participation outreach efforts for the substantial amendment have been included in the introduction and the outreach table.

AP-15: The Section 108 loan has been removed as a resource.

AP-20: The Section 108 loan goal has been removed, and replaced with the public facility and infrastructure goal.

AP-35/38: The Section 108 loan and Section 108 repayment projects have been removed, and replaced with the public facility and infrastructure project.

2. Summarize the objectives and outcomes identified in the Plan

Commerce City developed its five-year strategic plan based on an analysis of the data presented in the Consolidated Plan and the community participation and stakeholder consultation process. Through these efforts, the City identified priority needs and associated goals to address those needs for the five-year planning period. To further the five-year, the City has identified in PY 2024 the following needs and goals:

Priority Need 1: Public Services

Goal: Provide Services & Resources for LMI Residents - 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. Outcome: Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted

Priority Need 2: Housing and Homelessness

Goal: Provide, Preserve, and Support Affordable Housing - Provide for the preservation and repair of existing affordable housing, support for low- and moderate-income residents facing unaffordable rent and mortgage costs, and development of diverse affordable housing types. Outcome: Homeowner Housing Rehabilitated: 20 Household Housing Units

Priority Need 3: Public Infrastructure

Goal: Improve Public Infrastructure - Improve access to public facilities and infrastructure to benefit low- and moderate-income households and communities. Outcome: N/A. There are no goals for PY 2024, as the City will focus on public Services, housing, and Homelessness.

Priority Needs 4 & 5: Affirmatively Further Fair Housing Choice & Program Administration and Planning

Goal: Planning and Administration - Administration and planning functions associated with the CDBG program. Fair Housing outreach and training. Outcome: Other 1 (general admin duties to be performed).

3. Evaluation of past performance

C3, with other public/private agencies, nonprofit community housing providers, and other local government entities, has made significant contributions to providing safe, decent, and affordable housing, a suitable living environment, and economic opportunities, especially for low- to moderate-income individuals in the community. However, essential public services and affordable housing development and preservation remain some of the most prolific needs facing Commerce City and its residents, as documented by the City's Consolidated Plan and the Consolidated Annual Performance and Evaluation Report (CAPER).

According to the most recent PY 2022 CAPER, the City made significant progress in its housing and community development goals. These accomplishments are listed below:

Minor Home Repair: In PY 2022, the City assisted 16 LMI owner-occupied households with single-family housing rehab activities through the Minor Home Repair Program (MHRP) (12 LMI households) and the Brothers Redevelopment Paint-a-Thon program (4 LMI households). MHRP activities include minor repairs to homeowner housing with structural issues, vital appliances, and interior/exterior deferred maintenance. The Paint-a-Thon program provides exterior residential painting for seniors and disabled residents.

Public Facilities and Infrastructure Improvements: The City assisted 11,330 persons living in low/mod areas with facility improvements. This activity was associated with the American Legion Post 151 2022 activity, which made improvements to the park facility and benefited the immediate neighborhood.

Public Services and Homeless Prevention: The City and its partners assisted 3,831 LMI persons with vital public services that helped to improve their quality of life. These included services for the homeless and persons with a disability through the City Parks, Recreation and Golf (PRG) department and the City Homeless Outreach program, youth services through Kids in Need of Dentistry and A Precious Child, emergency services and subsistence payments to maintain housing through the Domestic Violence Victims Support Program and A Precious Child assistance program.

CDBG-CV

As of PY 2022, the City has completed rent and mortgage assistance programs for LMI residents impacted by the pandemic. The programs funded with CDBG-CV were facilitated by Almost Home and Access Housing, which assisted a total of 366 LMI households. Emergency assistance for rent and mortgage payments helped them avoid homelessness in this time of crisis. The City will spend the remaining funds to cover admin expenses and work to close out the CV grant.

4. Summary of Citizen Participation Process and consultation process

The City closely followed its HUD-approved Citizen Participation Plan in soliciting citizen input for the PY 2023 AAP. There were two public hearings held so City residents could offer input into how proposed

projects and activities fit with the City's housing and community development needs. A public comment period was held to give citizens an opportunity to review and submit written comments on the AAP. These outreach efforts are summarized below:

PUBLIC INPUT MEETING: The 2024 AAP was discussed at a public meeting on **April 17, 2024, at 6:00 PM** in the Council Chambers of the Civic Center, 7887 E. 60th Ave, Commerce City, CO 80022. For more information, email glewis@c3gov.com.

PUBLIC HEARING: A public hearing was scheduled to be held on **July 15, 2024**, during City Council in the Council Chambers, Civic Center, 7887 E. 60th Ave Commerce City, CO 80022. The meeting was also held 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. Additional information on how to participate could be made to the City Clerk's office at (303) 227-8797.

PUBLIC COMMENT PERIOD: A 30-day public comment review period was held from **June 14, 2024, to July 15, 2024**, to allow the public an opportunity to review and make comments on the draft 2024 AAP. The plan was available on the City website and at the Community Development Department office. Written comments could be sent to the Community Development Department, Commerce City Civic Center, 7887 E. 60th Avenue, Commerce City, CO 80022, or emailed to glewis@c3gov.com.

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

Substantial Amendment

The City's planned substantial amendment removes the Section 108 Loan as a resource and reallocates \$306,637 in CDBG to public facility/infrastructure projects not previously identified in the plan. As a result, the City's Citizen Participation Plan requires the City to enter into a new citizen participation process to gather feedback from citizens on the proposed substantial amendment to the AAP. The following participation details are given.

PUBLIC HEARING: A public hearing was scheduled to 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 held 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. Additional information on how to participate could be made to the City Clerk's office at (303) 227-8797.

PUBLIC COMMENT PERIOD: A 30-day public comment review period will be held from **June 20, 2025, to July 21, 2025**, to allow the public an opportunity to review and make comments on the draft 2024 AAP substantial amendment. The amendment will also be available on the City website and at the Community Development Department office. Written comments can be sent to the Community Development Department, Commerce City Civic Center, 7887 E. 60th Avenue, Commerce City, CO 80022, or emailed to glewis@c3gov.com.

5. Summary of public comments

PUBLIC INPUT MEETING - April 17, 2024, at 6:00 PM: There was one comment received in advance of the public input meeting. A member of the public wrote: I would like to see the CDBG funding go towards building a non-profit shelter or remodeling an existing building into a shelter for the migrants and homeless. I know that this would take some pressure off the City of Denver. There are already homeless camps starting under the I-270 bridge and there are migrants hustling around 60th/Dahlia southbound Rt. 2. And with the upcoming election, the situation is only going to get worse.

PUBLIC HEARING - July 15, 2024: There were no comments made.

PUBLIC COMMENT PERIOD - June 14, 2024, to July 15, 2024: There were no comments made.

There were no comments made. All comments were welcome. Public notices have been provided as attachments in the AD-26.

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

There were no comments made. All comments were welcome.

7. Summary

The 2024 AAP is the final year of the Consolidated Plan. The City anticipates receiving CDBG funds in the amount of \$409,823 for the 2024 fiscal year (October 1, 2024 – September 30, 2025). As identified by data analysis in the Consolidated Plan and by citizen participation, the plan will address the priority needs in the community.

The City will also utilize funds from the Section 108 Loan Program. The City is eligible to apply for a loan that is guaranteed by HUD in an amount of \$2,001,650 (up to the equivalent of 5 years of its current annual CDBG allocations PY 2024). The Section 108 Loan Guarantee Program provides a low-cost, flexible financing for proposed public improvement activities. The City can use Section 108 guaranteed loans to either finance specific projects or to launch loan funds to finance multiple projects over several years. The funds will be used for CDBG-eligible public facility and infrastructure projects. Proposed activities to be carried out in part or entirety with Section 108 Loan funds include street and sidewalk improvements in low/mod areas of the Core City.

Analysis of Impediments to Fair Housing Choice

Commerce City is included within the recently developed Adams County 2020 Analysis of Impediments to Fair Housing Choice (AI), which consists of a comprehensive review of laws, regulations, policies, and practices affecting housing affordability, accessibility, availability, and choice within the county and for member municipalities. This AI was completed on November 5, 2020. Through this analysis, the County and member municipalities identified six impediments to fair and affordable housing within the region.

They were: a shortage of affordable, accessible housing units; discrimination in rental transactions; barriers to homeownership; lack of resources to address poor housing conditions; disparate access to opportunity; and limited zoning code and land use regulations.

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

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

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

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

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information

George Lewis, CDBG Coordinator
City of Commerce City Community Development Department
7887 East 60th Avenue
Commerce City, Colorado 80022
Phone: 303-289-8168
Email: glewis@c3gov.com
Webpage: <https://www.c3gov.com/CDBG>

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

1. Introduction

The PY 2024 AAP citizen participation process includes extensive consultation with members of the public, community stakeholder organizations, other City departments, and CDBG staff throughout the City of Commerce City. Consultation is a vital component of the planning process. It's through these discussions that the City can identify the unmet community needs, in particular, the needs of low- to moderate-income households and special needs groups. The consultation gathered from the Consolidated Plan's citizen participation process helped to form the basis of the Strategic Plan, which identified the priority housing and community development needs and the goals of the City, including the goals in this PY 2024 AAP.

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

During the Consolidated Plan community engagement process, the City strove to engage with housing providers and health, mental health, and other service organizations and agencies. Stakeholders were invited to attend public input sessions, participate in individual interviews or focus groups, and/or provide input on housing and community needs through the project website. Housing, health, mental health, and other service providers that participated in the planning process include Almost Home, Colorado Access, Colorado Consumer Health Initiative, Colorado Orthodontic Foundation, Kids First Health Care, Kids in Need of Dentistry (KIND), Let Your Light Shine, Mercy Housing, St. Vincent de Paul-Commerce City Chapter, Tri-County Health, Denver Regional Council of Governments, Adams County Community and Economic Development, Commerce City Housing Authority, Maiker Housing, Catholic Charities, Salvation Army, Habitat for Humanity, Brothers Redevelopment, Rebuilding Together Metro Denver, Metro Denver Homeless Initiative, PASCO (Personal Assistance Services of Colorado, A Precious Child, Salud Family Health Centers, and State of Colorado Office of Homeless Initiatives. These efforts helped to inform the City of the community and housing needs in the City and continue to be the basis of the PY 2024 AAP.

The City also remains engaged with the Commerce City Services Alignment organization to assist in their efforts to coordinate family healthcare services and establish the Commerce City Community Campus, which will serve as a hub for neighborhood wellness in the core city.

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

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

The City of Commerce City participates in the Metropolitan Denver Continuum of Care led by the Metro Denver Homeless Initiative. The Metro Denver Homeless Initiative is a regional system that coordinates services and housing for people experiencing homelessness, including street outreach, emergency shelter, transitional housing, rapid rehousing, prevention and diversion, and permanent supportive housing. Although the City of Commerce City does not receive Emergency Solutions Grant (ESG) funds, the City will consider projects that address homeless needs for CDBG funding. Additionally, the City may provide support to or 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 Star Girlz – local homeless services and housing providers – to assess the current needs of homeless persons and persons at risk of homelessness in Commerce City. Funding applications to the 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 for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The City of Commerce City participates in the Metro Denver Continuum of Care led by the Metro Denver Homeless Initiative. As such, the City has an opportunity to provide input regarding the use of CoC ESG funds, performance standards and outcome evaluation, and 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 jurisdiction's 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
	Briefly describe how the Agency/Group/Organization was consulted. 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
	Briefly describe how the Agency/Group/Organization was consulted. 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
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	Briefly describe how the Agency/Group/Organization was consulted. 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
	Briefly describe how the Agency/Group/Organization was consulted. 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
	Briefly describe how the Agency/Group/Organization was consulted. 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
	Briefly describe how the Agency/Group/Organization was consulted. 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
	Briefly describe how the Agency/Group/Organization was consulted. 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
	Briefly describe how the Agency/Group/Organization was consulted. 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
	Briefly describe how the Agency/Group/Organization was consulted. 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.

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

There will be no agency types not intentionally consulted. All comments are welcome and accepted.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Metro Denver Homeless Initiative	MDHI's CoC application identifies policies and practices related to homelessness and organizations that provide homeless services and housing. This report informed the Market Analysis and the Strategic Plan homelessness strategy.

City of Commerce City C3 Vision Comprehensive Plan	City of Commerce City	Goals of the Comprehensive Plan that overlap with the goals of the Strategic Plan include: Reinvest in and rehabilitate aging housing stock, Increase housing types to meet current and future needs, Increase the range of housing prices, Ensure neighborhood accessibility to all modes of travel, Strengthen existing neighborhoods through reinvestment and assistance with renewal efforts, Promote regular physical activity by providing safe, convenient opportunities for recreation and humanpowered 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.
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Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Economic Development Strategic Plan (2010)	City of Commerce City	Goals of the Economic Development Strategic Plan that overlap with goals of the strategic plan include: Conduct in-depth research to determine occupations and skill sets most in demand by the targeted industries; Ensure that employer feedback about workforce strengths and weaknesses is periodically gathered through Cityemployer programs and communicated to area workforce development providers; Elevate high school graduation rates and technical training among area residents; and Increase local employer understanding and utilization of workforce development programs.
Walk.Bike.Fit Commerce City (2012)	City of Commerce City	Goals of the Walk.Bike.Fit plan that overlap with goals of the Strategic Plan include: As recommended in the current Parks and Recreation Master Plans and other documents, create a system of outdoor civic spaces that are destinations for active travel.
City of Commerce City Housing Needs Assessment	City of Commerce City	The Housing Needs Assessment notes several housing issues in Commerce City, including a housing affordability gap, lack of diversity in the city's housing stock, and a growing homeless population.

Commerce City Balanced Housing Plan	City of Commerce City and Commerce City Housing Authority	Goals of the Balanced Housing Plan and Commerce City Housing Authority Affordable Housing Implementation Plan that overlap with goals of the Strategic Plan include: Explore policies for creative housing solutions, Explore options to fund housing development, and develop special needs housing units.
Commerce City Station Area Master Plan	RTD Denver	Goal of building multi-use facilities and affordable housing near the new N Line Rapid Transit Districts station at 72nd and Colorado Blvd. Goal of improved connectivity through the City to the new N Line Rapid Transit District's new station at 72nd and Colorado Blvd.
Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
2020 Analysis of Impediments to Fair Housing	Adams County	Goals of the 2020 Analysis of Impediments to Fair Housing Choice in Adams County that overlap with goals of the Strategic Plan include: Collaborate regionally to develop resources and training for financial literacy, focused specifically on disproportionate impacts and housing challenges identified in this AI; Investigate funding sources to provide grants for home improvement, specifically to groups with high rates of denials for home improvement loans; Continue participation in the Metro Down payment Assistance program and consider affirmatively marketing to protected classes that are underrepresented in homeownership; Expand resources for the development of affordable housing in the county; Inventory public land and other resources that may contribute to attracting or constructing affordable housing in the county; Carry forward response and recovery efforts related to the impacts of the COVID-19 pandemic; and Expand internet access in the county, specifically for low-income households. Access to opportunity including employment, quality education, and health care depend heavily on strong internet access throughout the COVID-19 pandemic.

Table 3 – Other local / regional / federal planning efforts

Narrative

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

In PY 2022, the City of Commerce City joined the Adams County HOME Consortium, making the City eligible to receive HOME funds through the County to address affordable housing needs for its LMI residents. The City has aligned its Consolidated Plan period from 2021-2025 to 2020-2024 to match with Adams County's Consolidated Plan and will now have a cycle that ends PY 2024. HOME is administered by Adams County, and as the responsible lead entity, the County will be the direct recipient and report on HOME funds.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Commerce City has a Citizen Participation Plan that it follows closely in soliciting citizen input for the PY 2024 AAP. A public hearing is scheduled to be held so members of the public can offer input into how proposed projects and activities fit with the City's housing and community development needs identified in the five-year Strategic Plan. A public comment period will be held to give citizens an opportunity to review and submit written comments on the AAP. Members of the public are encouraged to share their views and ideas on the AAP and the upcoming planning year.

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

Note: The City published a public notice on April 4, 2024 in the Denver Post to advertise the public hearing and public comment period for the 2024 AAP. During the development of the plan, the City included the Section 108 loan as source of funds, and advertised a substantial amendment to the 2020-2024 Consolidated Plan as well as the 2024 AAP again in the Commerce City Sentinel and La Prensa respectively on May 30, 2024 and May 31, 2024. These public notices have been uploaded to the AD-26 citizen participation attachment.

Substantial Amendment

The City's planned substantial amendment removes the Section 108 Loan as a resource and reallocates \$306,637 in CDBG to public facility/infrastructure projects not previously identified in the plan. As a result, the City's Citizen Participation Plan requires the City to enter into a new citizen participation process to gather feedback from citizens on the proposed substantial amendment to the AAP. The following participation details are given in Sort Order #4 & #5.

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
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1	Public Meeting	Nontargeted/broad community	A public input meeting was held on April 17, 2024, at 6:00 PM to discuss the 2024 AAP. For more information, please contact glewis@c3gov.com	There was one comment received in advance of the public input meeting. A member of the public wrote: I would like to see the CDBG funding go towards building a non-profit shelter or remodeling an existing building into a shelter for the migrants and homeless. I know that this would take some pressure off the City of Denver. There are already homeless camps starting under the I270 bridge and there are migrants hustling around 60th/Dahlia southbound Rt. 2. And with the upcoming election,	All comments were welcome and accepted.	c3gov.com/council
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments accepted and not	URL
				the situation is only going to get worse.		
2	30-Day Public Comment Period	Nontargeted/broad community	A 30-day public comment review period was held from June 14, 2024, to July 15, 2024 to allow the public an opportunity to review and make comments on the draft 2024 AAP. The plan was available on the City website and at the Community Development Department office. Written comments could be sent to the Community Development Department, Commerce City Civic Center, 7887 E. 60th Avenue, Commerce City, CO 80022 or emailed to glewis@c3gov.com	There were no comments.	There were no comments made. All comments were welcome.	https://www.c3gov.com/government/communitydevelopment-blockgrant-cdbg
3	Public Hearing	Nontargeted/broad community	A public hearing was held on July 15, 2024, during City Council in the Council Chambers, Civic Center, 7887 E. 60th Ave Commerce City, CO 80022. The hearing was also held live on Channel 8 and c3gov.com/video. Citizens could 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 office at (303) 227-8797.	There were no comments.	There were no comments made. All comments were welcome.	c3gov.com/council

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments accepted or not and reasons	URL
4	30-Day Public Comment Period	Nontargeted/broad community	(Substantial Amendment): A 30-day public comment review period will be held from June 20, 2025, to July 21, 2025 , to allow the public an opportunity to review and make comments on the draft 2024 AAP substantial amendment. The amendment will also be available on the City website and at the Community Development Department office. Written comments can be sent to the Community Development Department, Commerce City Civic Center, 7887 E. 60th Avenue, Commerce City, CO 80022, or emailed to glewis@c3gov.com .	A summary of comments will be provided after the public comment period.	All comments welcome.	https://www.c3gov.com/government/communitydevelopment-blockgrant-cdbg

5	Public Hearing	Nontargeted/broad community	(Substantial Amendment): A public hearing was scheduled to 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 held 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. Additional information on how to participate could be made to the City Clerk's office at (303) 227-8797.	A summary of comments will be provided after the public hearing.	All comments welcome.	c3gov.com/council
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Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

In PY 2024, the City of Commerce anticipates receiving \$409,823 in CDBG funds for its community development projects. CDBG funds will help to address the goals outlined in the AAP that address the needs identified in the Consolidated Plan. The City will also reallocate \$40,250 originally programmed towards neighborhood facility improvements at Access Housing. However, this agency is dissolving, and these funds will now be reprogrammed.

PY 2024 is the final program year of the Consolidated Plan, and next year will start a new five-year ConPlan cycle. **Anticipated**

Resources

Program	Uses of Funds	Expected Amount Available Year 1	Expected	Narrative Description
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	Source of Funds		Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$	Amount Available Remainder of ConPlan \$	
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	409,823.00	0.00	40,250.00	450,073.00	0.00	PY 2024 is the final program year of the Consolidated Plan, and next year will start a new five-year ConPlan cycle. All prior year resources have been obligated to projects and no prior year resources are expected to be used during PY 2024 at this point.

Table 5 - Expected Resources – Priority Table

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

The CDBG program does not have a matching requirement. However, Commerce City encourages City departments and 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.

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

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Services & Resources for LMI Residents	2021	2024	Non-Homeless Special Needs	Citywide	Public Services	CDBG: \$61,472.00	Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
2	Planning and Administration	2021	2024	Administration & Planning	Citywide	Administration & Planning	CDBG: \$81,964.00	Other: 1 Other
3	Improve Public Infrastructure	2021	2024	Non-Housing Community Development	Citywide	Improve Public Infrastructure	CDBG: \$306,637.00	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit: 12345 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Provide Services & Resources for LMI Residents
	Goal Description	Provide public services to stabilize low- and moderate-income individuals and households and/or those with nonhomeless special needs and increase their access to opportunity.
2	Goal Name	Planning and Administration

	Goal Description	Administration and planning functions associated with the CDBG program. Fair Housing outreach and training.
3	Goal Name	Improve Public Infrastructure
	Goal Description	Provide eligible public facility and infrastructure improvement activities such as those to streets and sidewalks in low/mod areas of the City. Low/mod areas will be determined by HUD LMISD block group tract data.

Projects

AP-35 Projects – 91.220(d)

Introduction

The PY 2024 AAP projects are identified below. CDBG will fund projects that will provide positive outcomes for public improvements and vital supportive services for LMI and special needs groups. CDBG has a 20% grant cap for administrative costs and a 15% grant cap of the total allocation to fund public service programs.

Substantial Amendment

The City originally intended to utilize the Section 108 Loan program to finance multiple CDBG-eligible public facility and infrastructure projects over several years in the original 2024 AAP submission. Proposed activities included street and sidewalk improvements in low/mod areas of the Core City. The planned loan amount was \$1,918,135, which has been removed from the plan. The City also included a planned repayment amount of \$306,637, which has also been reallocated towards public facility and infrastructure improvements.

Projects

#	Project Name
1	CDBG: Administration (2024)
2	CDBG: Public Services
3	CDBG: CDBG: Public Facilities & Infrastructure

Table 7 - Project Information

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

All activities listed will help address a priority need identified in the Consolidated Plan. In an analysis of the public input received across interviews, focus groups, community meetings, online tools, and all other methods, housing and homelessness-related needs were cited more than almost any other type of need. Based on this information, the City's internal team of CDBG advisors rated housing and homelessness a high-priority need. Therefore, PY 2024 CDBG funding will primarily go towards homeless services.

Also, during the public input process, the vast majority of needs were related to public services. 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.

Citizens in the public input process named public infrastructure improvements they would like to see in their communities in the areas of transportation, pedestrian improvements, park improvements, broadband access, and streetscaping. The size of the allocation available to Commerce City relative to the cost of large-scale infrastructure projects minimizes the ability for significant CDBG impact in the area of public infrastructure. Public infrastructure improvements are funded by Section 108 loans, and the City will make repayments of the Section 108 loan with CDBG funds.

Affordable housing preservation remains a high priority for Commerce City. Housing cost burden is the biggest housing problem in the City, in particular for low-income households. While the City recognizes this need, and will address these needs as they arise, the City may not fund these activities in every year of the 5-year planning period.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG: Administration (2024)
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Administration & Planning
	Funding	CDBG: \$81,964.00
	Description	Administration and Planning of CDBG funds for PY 2024. The total amount allocated to admin od the program may not exceed 20% of the total grant award.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	7887 E. 60th Ave, Commerce City, CO 80022
2	Planned Activities	General program administration and planning (21A).
	Project Name	CDBG: Public Services
	Target Area	Citywide
	Goals Supported	Provide Services & Resources for LMI Residents
	Needs Addressed	Public Services
	Funding	CDBG: \$61,472.00
	Description	Public services that will target and benefit low- to moderateincome households and special needs groups such as persons atrisk or experiencing homelessness. The total amount allocated to public services may not exceed 15% of the total grant award.
	Target Date	9/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
	Location Description	Citywide, eligible.

	Planned Activities	Planned activities include services for: A Precious Child (05D) Homeless Prevention Programs (03T)
3	Project Name	CDBG: Public Facilities & Infrastructure
	Target Area	Citywide
	Goals Supported	Improve Public Infrastructure
	Needs Addressed	Improve Public Infrastructure
	Funding	CDBG: \$306,637.00
	Description	The City has reallocated CDBG funds towards eligible public improvement activities such as street and sidewalk improvements in low/mod areas of the City. This activity also includes \$40,250 reallocated from PY 2022 prior year funds.
	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/Mod Income Housing Benefit: 12345 Persons Assisted
	Location Description	Citywide, eligible low/mod areas.
	Planned Activities	Planned activities include improvements to streets (03K) and sidewalks (03L). Low/mod areas will be determined by HUD LMISD block group tract data.

AP-50 Geographic Distribution – 91.220(f)

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

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

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

The City, however, does not allocate funding based solely on geographic requirements. Individuals or households must meet income qualifications in order to receive direct assistance from activities such as housing rehab and public services in the CDBG program. Eligible activities 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	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

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

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 2018-2022 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 3.7% of the citywide population, and a census tract is considered a concentration if 13.7% of the population is part of this racial group. There are no census tracts with a concentration.

Asian: Approximately 2.3% of the City population identifies as Asian. A census tract is considered a concentration if 12.3% of the population is part of this racial group. There are no census tracts with a concentration.

Hispanic: Hispanics make up 48.4% of the City's population, and a census tract is considered a concentration if 58.4% 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 2018-2022 ACS 5-Year Estimates, the MHI in Commerce City is \$102,607. A tract is considered to have a low-income concentration if the MHI is \$82,086 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.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

To City did not fund housing rehab activities with PY 2024 funds. The City is focusing on public infrastructure such as street improvements in low/mod areas. These investments will improve and revitalize low/mod areas in Commerce City, and indirectly benefit affordable housing development.

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

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

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

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

60 Public Housing – 91.220(h)

Introduction

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

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

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

The Commerce City Housing Authority does not have any traditional public housing. However, the CCHA is committed to creating and sustaining affordable housing options in the City. Over the next year, the CCHA will continue to address the needs of subsidized and affordable housing in Commerce City by:

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

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

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

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

AP-

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

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

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

The CCHA is not covered by a PHA Plan and is not subject to a HUD review or designation of this type. Maiker Housing Partners (formerly Adams County Housing Authority) is designated a “Small PHA” and is not designated as PHAS or SEMAP troubled or at risk of being designated as troubled.

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

Introduction

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

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

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

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

Projects to support homeless outreach in PY 2024 include continuing to provide homeless outreach supplies, including basic supplies and services for the City's homeless navigator to meet and assist people experiencing homelessness. The homeless navigator collaborates with city departments and external organizations to coordinate homeless navigation efforts for individuals and families in need of services and support within the city.

Addressing the emergency shelter and transitional housing needs of homeless persons

While the City does not plan to directly fund any emergency shelter and transitional housing projects with CDBG funds in PY 2024, the City will continue to support and help to expand the availability of homeless services and housing through providers such as Almost Home and others. These homeless service providers will continue to provide emergency and transitional for people experiencing homelessness.

The CDBG Office's partnership with the Community Resource Network improves the delivery of services and resources to the homeless and residents at risk of becoming homeless. The city will continue to seek out new partnerships with nonprofits, faith-based organizations, school districts, and other community programs.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that

AP-

individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

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

The City will continue to support the Continuum of Care and homeless service providers that recognize the need to shift focus and resources to long-term, permanent housing in order to end homelessness. Commerce City will consider funding future projects designed to assist people experiencing homelessness make the transition to permanent housing with the priority of expanding the availability of homeless services and housing. The City is also a member of the Adams County HOME consortium and plans to utilize county HOME funds to create and rehabilitate affordable and accessible units.

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

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

75 Barriers to affordable housing – 91.220(j) Introduction:

When the City developed its Consolidated Plan, it conducted extensive citizen participation to gather public input on priority needs. Through this citizen participation process, the City was able to identify

several barriers to affordable housing, including increasing water and wastewater connection fees, lengthy development review processes, and community pushback against multifamily housing.

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

Water/Wastewater Connection Fees

The South Adams County Water and Sanitation District voted in April 2021 to approve the water and wastewater connection fees proposed in its December 2020 study. The City will continue to assess water and wastewater connection fees.

Navigating NIMBYism for Multifamily Housing

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

Internal Development Review Process

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

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

Attracting and Maintaining Affordable Housing

Commerce City staff will continue to work with affordable housing developers to introduce creative housing opportunities using the city's PUD zoning flexibilities. In addition to attracting affordable housing developers, various departments in the City plan to work with the private sector and provide ongoing education for residents on the benefits of affordable housing projects. Finally, the CDBG Office will help

AP-

maintain the City's existing affordable housing stock by sharing information with local service providers on housing availability and opportunities for residents to participate in the City's Minor Home Repair program.

85 Other Actions – 91.220(k) Introduction:

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

Actions planned to address obstacles to meeting underserved needs

Residents and stakeholders who participated in 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

AP-

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. To assist city residents will foster institutional cooperation and communication. All activities detailed in this plan will work to reduce the number of poverty-level families in Commerce City.

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 – 91.220(I)(1,2,4)

Introduction:

The estimated percentage of CDBG funds used for activities benefiting persons of low- and moderate income over the one-year period covered by the 2024 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(I)(1)

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

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

Total Program Income: 0

Other CDBG Requirements

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