2016-2021 Consolidated Plan
and
2016 Annual Action Plan

Commerce City, Colorado

Draft: July 1, 2016

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Commerce
CITY

2016-2021 CONSOLIDATED PLAN

AND

2016 ANNUAL ACTION PLAN

August, 2016

Prepared for the
The City of Commerce City
Community Development Department
7887 E. 60th Avenue
Commerce City, CO 80022

Prepared by

MOSAiC
COMMUNITY PLANNING

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OMB Control No: 2506-0117 (exp. 07/31/2015)

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Executive Summary

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

1. Introduction

Beginning in the 2016-2017 program year, Commerce City will be a direct recipient of funds from the U.S. Department of Housing and Urban Development (HUD) through the Community Development Block Grant (CDBG) program. While Commerce City previously received a CDBG allocation through Adams County, this will be its first year as a direct recipient. Commerce City's 2016-2021 Consolidated Plan is a comprehensive planning document promoting a coordinated approach to housing and community development needs based on the use of the CDBG program. This plan provides guidance on the investment of HUD dollars, as well as other federal, state, and local funds. It outlines the priorities by which the City's CDBG funds will be invested over the next five years. Each year, the City will produce an Annual Action Plan to detail specific activities to carry out the goals and priorities expressed in the Five-Year Plan.

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

Commerce City's priorities for the five-year period covered by this Consolidated Plan are shown below. These priority needs were developed based on extensive citizen participation and stakeholder consultation, and analyses of the city's top housing, homeless, special needs populations, and non-housing community development needs.

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1	Priority Need Name	**NEIGHBORHOOD REVITALIZATION**
	Priority Level	High
	Population Served	Extremely Low-Income Low-Income Moderate-Income Disabled (Physical, Mental, Behavioral Health) Elderly and Frail Elderly Children and Youth Homeless and At-Risk Populations
	Associated Goals	Sidewalk Construction and Repair Local Bus Stop Improvements Construction of ADA Ramps Drainage Improvements Revolving Loan Fund Business Incubator Demolition and Clearance Public Services Minor Home Repair
	Description	• Fund non-housing community development proposals that eliminate blight, to include sidewalk construction and repair, street maintenance and improvements, streetscaping, street lighting, bus stop improvements, demolition and redevelopment, and other improvements not listed here. • Coordinate and provide support for local neighborhood beautification and litter clean-up efforts. • Provide economic development and small business support services to entrepreneurs to revitalize blighted commercial districts.
	Basis for Priority	Interviews with key community stakeholders, public meeting input, and survey data

2	Priority Need Name	**PRESERVE AND EXPAND AFFORDABLE HOUSING**
	Priority Level	High
	Population Served	Extremely Low-Income Low-Income Moderate-Income
	Associated Goals	Minor Home Repair
	Description	• Support local efforts to increase affordable housing options, particularly for the elderly. • Extend the useful life of existing affordable housing through rehabilitation, emergency repair, and weatherization programs.
	Basis for Priority	Interviews with key community stakeholders, public meeting input, survey data, HUD's CHAS data and other information on cost burden, market analysis
3	Priority Need Name	**ECONOMIC DEVELOPMENT**
	Priority Level	High
	Population Served	Extremely Low-Income Low-Income Moderate-Income
	Associated Goals	Job Training Revolving Loan Fund Business Incubator
	Description	• Provide programs offering job skills training, education, and other assistance to enhance Commerce City residents' economic competitiveness. • Support entrepreneurs and business development to create new employment opportunities. • Create a small business incubator to foster and grow small businesses. • Operate a loan program to help local business owners with capital to start or expand a business.
	Basis for Priority	Interviews with key community stakeholders, public meeting input, survey data

4	Priority Need Name	**PUBLIC SERVICES SUPPORTING LOW-INCOME AND SPECIAL NEEDS POPULATIONS**
	Priority Level	High
	Population Served	Extremely Low-Income Low-Income Moderate-Income Disabled (Physical, Mental, Behavioral Health) Elderly and Frail Elderly Children and Youth Homeless and At-Risk Populations
	Associated Goals	Job Training Business Incubator Public Services
	Description	• Fund community services including youth-focused activities, programming for seniors, crime prevention, drug abuse education, and employment training. • Assist with the coordination of local organizations and resources to enhance the community's ability to meet its needs and challenges. Assist persons who are homeless through emergency, transitional, and permanent housing and supportive services. • Assist households at risk of homelessness with short-term rental payment and other assistance.
	Basis for Priority	Needs assessment, stakeholder interviews, public meeting comments, survey data
5	Priority Need Name	**AFFIRMATIVELY FURTHER FAIR HOUSING CHOICE**
	Priority Level	High
	Population Served	All
	Associated Goals	Affirmatively Further Fair Housing Choice
	Description	• Make funding available for fair housing activities to include potential award(s) to local organizations to encourage provision of fair housing education, complaint handling services, and/or enforcement.
	Basis for Priority	Stakeholder input, impediments identified in Adams County Analysis of Impediments.

6	Priority Need Name	**PROGRAM ADMINISTRATION AND PLANNING**
	Priority Level	High
	Population Served	All
	Associated Goals	Administration and Planning
	Description	• Funding for performance of CDBG administrative requirements.
	Basis for Priority	Needs Assessment

3. Evaluation of past performance

This is the first year that Commerce City has received CDBG funds from HUD as a direct recipient, as the City received an allocation through the county in previous years. Following the 2016-2017 program year, the City will prepare a Consolidated Annual Performance Evaluation Report (CAPER) outlining its progress toward meeting its five-year and annual goals. The CAPER will be submitted to HUD within 90 days of the program year end, and copies of the draft and final CAPER will be available online and in hard copy for citizen review.

4. Summary of citizen participation process and consultation process

Commerce City conducted significant consultation with citizens, city staff, county and regional agencies, non-profit organizations, local housing authorities, Continuum of Care members, and others in preparing this Plan. The City hosed three evening needs assessment workshops open to the public at various locations in Commerce City. Two focus groups for seniors and youth were also held. These meetings are summarized in the Citizen Participation section of this document.

In addition to several public meetings, the City conducted a communitywide needs survey from late April through early June 2016. Two hundred and ten (210) respondents participated in the survey, including 30 Spanish speakers. Priority needs as identified through the survey are listed in the Citizen Participation section of this Plan.

The draft Five-Year Consolidated Plan and Annual Action Plan will be available for public review and comment throughout a 30-day public comment period in July 2016. Input received from stakeholders and members of the public will be appended to the final document.

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5. Summary of public comments

Comments received through the needs assessment workshops, focus groups, interviews, and community survey are summarized in the Citizen Participation section of this Plan and incorporated in individual sections as relevant.

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

The City took all comments into consideration in preparing this Consolidated Plan and Annual Action Plan. The City reviewed all comments for common and recurring themes to help establish priorities and goals. No comments or views were not accepted.

7. Summary

This five-year plan identifies the community's affordable housing, homeless, community development, and economic development needs, as well as outlines a comprehensive and coordinated strategy for implementation of programs. The City will use its CDBG funding to leverage other public and private investment in order to address its goals and priorities.

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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
Lead Agency	City of Commerce City	Community Development Department

Table 1 – Responsible Agencies

Narrative

The City of Commerce City Community Development Department prepared this 2016-2021 Five-Year Consolidated Plan and 2016-2017 Annual Action Plan through the collaborative efforts of City staff and local stakeholders, with assistance from Mosaic Community Planning.

Consolidated Plan Public Contact Information

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

1. Introduction

In preparing this Plan, the City of Commerce City conducted significant outreach to local stakeholders including staff, elected officials, non-profit agencies, housing developers, local service providers, government agencies, housing authorities, and others. Representatives of over 50 organizations were personally contacted and invited to participate in an individual or group interview. Stakeholders were also invited to attend one of three public needs assessment workshops and to complete a community-wide survey regarding housing and community development needs. Representatives from 29 organizations provided input for the Plan through interviews or meetings; the community survey received 210 responses, including members of the public.

In addition to local stakeholders, other sources consulted in preparation of the Consolidated Plan include previous surveys, studies, and reports completed for Commerce City, Adams County, and metro Denver. Specific reports consulted are listed in Table 3; relevant information from each is incorporated throughout the Plan where relevant.

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 strove to include both housing providers and health, mental health, and other service agencies in the development of this Plan. Representatives from over 50 organizations were invited to attend public meetings and/or participate in interviews. Groups that participated included the Commerce City Housing Authority, the Adams County Housing Authority, Habitat for Humanity, Archdiocese Housing, Almost Home, Access Housing, Kids First Healthcare, Stout Street Foundation, Commerce City Senior Programs, Suncor Boys and Girls Club, and Anythink Library. Commerce City's priorities, goals, and projects for the next five years will be designed to promote enhanced coordination between local housing and health, mental health, and other service organizations, based on input received through consultation with these groups.

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 contacted representatives from the Metro Denver Homeless Initiative, the Colorado Coalition for the Homeless, Access Housing, and Almost Home to gather perspectives regarding the needs of homeless persons and persons at risk of homelessness. The Metro Denver Homeless Initiative (MDHI) serves as the lead agency for the metro area's Continuum of Care, bringing together homeless service and housing providers, local and state agencies, foundations, health service providers, neighborhood organizations, and homeless

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individuals to address homeless needs in the Denver area. Each January, MDHI conducts a Point-In-Time count of homelessness in its seven county service area, which includes Adams County and Commerce City. In addition to identifying the number of sheltered and unsheltered homeless persons, the count also gathers information regarding respondents' age, gender, race, ethnicity, family type, veteran status, and length of homelessness, along with factors contributing to their homelessness. MDHI also published a *2014 State of Homelessness Report* characterizing homeless and at-risk population in the region. This report, together with the 2015 Point-In-Time count for Adams County, informed the homeless needs and strategy sections of this Plan, promoting coordination with the metro Denver Continuum of Care.

Input from representatives of Access Housing and Almost Home – two homeless service and housing providers working in Adams County – also provided input regarding the needs of and resources for homeless persons and persons at risk of homelessness in Commerce City. Representatives also provided strategy suggestions for addressing these needs, which are incorporated into relevant sections of this Plan.

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

The City of Commerce City does not receive Emergency Solutions Grant (ESG) funds. Agencies in Commerce City that serve the homeless population enter data into the Homeless Management Information System (HMIS) for reporting to the Continuum of Care to track the provision of services.

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

In addition to obtaining input from Community Development staff, the City of Commerce City invited more than 50 local stakeholders to provide input for the Consolidated Plan via public meetings, in-person or telephone interviews, and/or participation in a survey regarding housing and community development needs. The City also advertised the planning process and ways to get involved in the *Commerce City Connected* newsletter (which is sent to all households within the city), through various city mediums including websites and social media channels, through press releases to local news outlets, through direct email to all City board and commission members, and through flyers (in English and Spanish) placed around the city. Representatives from 29

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organizations participated; they are listed in

	Agency/Group/ Organization Name	Agency/Group/ Organization Type	Consolidated Plan Section Consulted	Consult Type
1	**Access Housing**	Housing; Services-Homeless	Housing Need Assessment; Homeless Needs-Chronically Homeless, Families with Children, Veterans; Homelessness Strategy	Interview
2	**Adams County Housing Authority**	Public Housing Authority	Housing Need Assessment; Public Housing Needs; Other-Barriers to Affordable Housing; Anti-Poverty Strategy	Interview
3	**Adams County Workforce and Business Center**	Services-Employment	Market Analysis; Non-Housing Community Development Strategy; Other-Non-Housing Community Development Needs	Interview
4	**Almost Home**	Housing; Services-Homeless	Housing Need Assessment; Homeless Needs-Chronically Homeless, Families with Children, Veterans; Homelessness Strategy	Interview
5	**Anythink Library**	Services-Education	Housing Need Assessment; Non-Homeless Special Needs; Market Analysis; Non-Housing Community Development Strategy; Anti-Poverty Strategy	Interview
6	**Archdiocese Housing**	Housing	Housing Need Assessment; Market Analysis	Interview
7	**Colorado Housing and Finance Authority**	Private Sector Banking/Financing	Housing Need Assessment; Market Analysis; Other-Barriers to Affordable Housing	Interview
8	**Commerce City Board of Adjustment**	Planning Organization	Housing Need Assessment; Non-Homeless Special Needs; Non-Housing Community Development Strategy	Public Meeting
9	**Commerce City City Council**	Other Government-Local	Housing Need Assessment; Market Analysis; Non-Housing Community Development Strategy; Other-Barriers to Affordable Housing	Interview

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10	**Commerce City Historical Society**	Civic Leaders	Housing Need Assessment; Non-Homeless Special Needs; Non-Housing Community Development Strategy	Public Meeting
11	**Commerce City Housing Authority**	Public Housing Authority	Housing Need Assessment; Public Housing Needs; Other-Barriers to Affordable Housing	Interview
12	**Commerce City Housing Authority Board**	Public Housing Authority	Housing Need Assessment; Non-Homeless Special Needs; Non-Housing Community Development Strategy	Public Meeting
13	**Commerce City Planning Commission**	Planning Organization	Housing Need Assessment; Non-Homeless Special Needs; Non-Housing Community Development Strategy	Public Meeting
14	**Commerce City Quality Community Foundation Board**	Civic Leaders	Housing Need Assessment; Non-Homeless Special Needs; Non-Housing Community Development Strategy	Public Meeting
15	**Commerce City Senior Programs**	Services-Elderly Persons	Non-Homeless Special Needs; Non-Housing Community Development Strategy	Interview
16	**Commerce City Youth Commission**	Services-Youth	Housing Need Assessment; Non-Homeless Special Needs; Non-Housing Community Development Strategy	Focus Group
17	**Community Enterprise**	Civic Leaders; Other-Limited English Proficiency populations	Non-Homeless Special Needs; Non-Housing Community Development Strategy; Anti-Poverty Strategy	Interview
18	**Cultural Council of Commerce City**	Civic Leaders	Housing Need Assessment; Non-Homeless Special Needs; Non-Housing Community Development Strategy	Public Meeting
19	**Denver Metro Fair Housing Center**	Services-Fair Housing; Regional Organization	Housing Need Assessment; Market Analysis; Other-Fair Housing; Other-Barriers to Affordable Housing	Interview
20	**Habitat for Humanity of Metro Denver**	Housing; Regional Organization	Housing Need Assessment; Market Analysis; Other-Barriers to Affordable Housing; Other-Influence of Market Conditions	Interview

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21	**Kids First Healthcare**	Services-Health	Non-Homeless Special Needs; Non-Housing Community Development Strategy	Interview
22	**Newcastle Properties**	Housing	Housing Need Assessment; Market Analysis; Other-Barriers to Affordable Housing	Interview
23	**Our Lady Mother of the Church**	Other-Limited English Proficiency populations; Faith-Based Organization	Housing Need Assessment; Non-Homeless Special Needs; Non-Housing Community Development Strategy	Interview
24	**Regional Transportation District (RTD)**	Other-Transit; Regional Organization	Non-Homeless Special Needs; Non-Housing Community Development Strategy	Written Comments
25	**School District 27J**	Services-Education	Non-Housing Community Development Strategy	Interview
26	**The Senior Hub**	Services-Elderly Persons	Housing Need Assessment; Non-Homeless Special Needs	Interview
27	**South Adams County Water & Sanitation District Board**	Civic Leaders	Housing Need Assessment; Non-Homeless Special Needs; Non-Housing Community Development Strategy	Public Meeting
28	**Stout Street Foundation**	Services-Health	Housing Need Assessment; Non-Homeless Special Needs	Interview
29	**Suncor Boys & Girls Club**	Services-Children	Non-Housing Community Development Strategy; Other-Non-Housing Community Development Needs	Interview

Table 2 with areas of the Plan for which they provided input. Agencies consulted include housing providers/developers, housing authorities, service providers (youth, seniors, special needs, health needs), faith-based organizations, education providers, fair housing agencies, and public agencies.

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5	**Anythink Library**	Services-Education	Housing Need Assessment; Non-Homeless Special Needs; Market Analysis; Non-Housing Community Development Strategy; Anti-Poverty Strategy	Interview
6	**Archdiocese Housing**	Housing	Housing Need Assessment; Market Analysis	Interview
7	**Colorado Housing and Finance Authority**	Private Sector Banking/Financing	Housing Need Assessment; Market Analysis; Other-Barriers to Affordable Housing	Interview
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29	**Suncor Boys & Girls Club**	Services-Children	Non-Housing Community Development Strategy; Other-Non-Housing Community Development Needs	Interview

Table 2 – Agencies, groups, organizations who participated

Identify any agency types not consulted and provide rationale for not consulting

Efforts were made to consult as broad a group of community stakeholders as possible. Invitations to participate in the planning process were extended to over 50 organizations, which had the option of attending a public meeting, giving an individual or small group interview, or completing an anonymous survey. No agency types were excluded from participation.

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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?
2014 State of Homelessness Report for the Seven-County Denver Metropolitan Area **Prepared by the Metro Denver Homeless Initiative**	Metro Denver Homeless Initiative	The *State of Homelessness Report* identifies the extent of homelessness in metro Denver by county. It characterizes the homeless population in terms of chronic homelessness, family type, and veteran status. It also discusses factors contributing to homelessness. This report informs Strategic Plan priorities and strategy related to homelessness.
***Metropolitan Denver Homeless Initiative Continuum of Care Consolidated Application* (FY 2015)** **Prepared by the Metro Denver Homeless Imitative**	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.
***Commerce City Housing Authority Strategic Plan* (October 2011)** **Prepared by the Commerce City Housing Authority**	Commerce City Housing Authority	The Commerce City Housing Authority identifies five goals that directly overlap with the Strategic Plan, including: (1) Preserve and enhance the number of quality affordable homes; (2) Examine opportunities for new affordable housing development in all areas; (3) Develop additional services and opportunities to promote self-sufficiency for residents; (4) Work with partners to develop and meet common affordable housing goals; and (5) Continually strive for an excellent and professional Housing Authority.

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***PHA Annual Plan* (FY2016)** **Prepared by the Adams County Housing Authority**	Adams County Housing Authority	PHA goals overlap with Strategic Plan goals related to the provision of affordable housing, economic development, and fair housing. Specific goals from the *PHA Annual Plan* include: (1) Increasing decent affordable housing options through real estate development and expansion of housing programs; (2) Expanding programs and services to encourage economic self-sufficiency among residents and program participants; (3) Endorsing fair and equal opportunity in housing; (4) Developing and launching an educational campaign on the need for affordable housing; and (5) Connecting the community to appropriate housing information and resources.
***City of Commerce City C3 Vision Comprehensive Plan* (May 2010)** **Prepared by Clarion Associates with Felsburg, Holt and Ullevig and BBC**	City of Commerce City	The C3 *Vision Plan* provides a blueprint for city decision-making and a regulatory framework for the City through 2035. The plan outlines guiding principles for housing, economic development, redevelopment, infrastructure, and parks and open space. For each of these elements, the community vision expressed in the Comprehensive Plan may be furthered using CDBG funds.
***Commerce City Station Area Master Plan* (2013)** **Prepared by MIG with EPS, Fox Tuttle Transportation, and Roscoe Engineering**	City of Commerce City	The *Station Area Master Plan* (STAMP) provides a vision, planning framework, and urban design concept for the future E. 72nd Avenue Commuter Rail Station and the Adams City and Adams Heights neighborhoods that surround it. STAMP identified CDBG as a potential funding source for streetscape improvements, creation and retention of affordable housing, and anti-displacement initiatives. The Strategic Plan priorities and goal reflect these STAMP goals.

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2014 Citizen Survey for the City of Commerce City, Colorado **Prepared by Corona Insights**	City of Commerce City	This report summarizes results of a public phone survey of Commerce City residents regarding perceptions of and satisfaction with City services and facilities and needs related to future growth and development. Findings indicate that residents like Commerce City because of its reasonable housing prices but would like to see improvement related to train traffic, availability of restaurants and shopping, and job opportunities. Survey results provided background information for the development of Strategic Plan priorities and goals, particularly related to economic development.
Commerce City 2016 Economic Profile **Prepared by Commerce City**	City of Commerce City	This report provides several key economic indicators for Commerce City, including population growth, employment by industry, labor force and unemployment statistics, top employers and employment centers, transportation system indicators, cost of living, and housing costs. This report provided background information for development of Strategic Plan priorities and goals, particularly related to economic development.
***Quality Community Initiative (QCI) Stakeholder Group Final Report* (2013)** **Prepared by the Commerce City Quality Community Initiative**	City of Commerce City Quality Community Initiative	The QCI Stakeholder Group's report recommends potential capital projects and funding strategies to meet long-term needs in Commerce City. Recommended projects included four roadway improvements, development of community parks, improved and new recreation centers, drainage improvements and maintenance, a new police substation in north Commerce City, and a cultural arts center and museum. These recommendations informed development of Strategic Plan goals and policies related to public infrastructure and facility improvements.

Table 3 – Other local / regional / federal planning efforts

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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(l))

As the City of Commerce City implements its Five-Year Consolidated Plan, the City will work with other local public and private entities, metro Denver regional organizations, adjacent municipalities, Adams County, and the State of Colorado to address housing and community development needs. Projects funded by Commerce City through CDBG may focus on areas of the city that are or will be served or otherwise improved by regional agencies. For example, the Year 1 project to improve bus stops will occur along RTD routes. Future CDBG projects may be coordinated with expansion of RTD light rail and related redevelopment at East 72nd Avenue and Colorado Boulevard.

The City will also work to expand its role as a convener of local organizations with a housing and/or community development mission. This may include making subrecipient grants to nonprofit agencies working specifically in Commerce City, in Adams County, or throughout the metro Denver region.

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PR-15 Citizen Participation

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 residents were invited to attend three public needs assessment workshops at various times and locations throughout the city so as to be convenient to a variety of residents. In order to reach out to Commerce City's Spanish-speaking population, one workshop was held at a local church around the time of its evening Spanish mass; Spanish interpreters were available for this meeting. Two focus groups were also held – one during a Senior Center luncheon and another during a regular Youth Commission meeting. A total of 66 people participated in the meetings and focus groups.

A Community Needs Survey in English and Spanish was available to residents via a web link and in hard copy. Paper copies of the survey were available at each public meeting and at other public locations in Commerce City. The survey was advertised to Spanish speakers on the Latino Engagement Task Force via Community Enterprise and made available at one of the City's community summer outreaches. The survey ran from April 25, 2016 to June 13, 2016 and collected 210 responses.

Advertisement for the public meetings and survey targeted the general public, as well as areas of low and moderate income households, racial/ethnic minority concentrations, and persons with limited English proficiency. Advance notice was given to residents through announcements in the *Commerce City Connected* newsletter, through various city mediums including websites and social media channels, through press releases to local news outlets, and via flyers placed throughout the city. Dates, times, and locations for the workshops and focus groups are shown below:

Needs Assessment Workshop
Tuesday, May 3, 2016
5:30 – 7:30 pm
Our Lady Mother of the Church
6690 E. 72nd Avenue, Classroom 4
Commerce City, CO 80022

Needs Assessment Workshop
Wednesday, May 4, 2016
6:00 – 7:30 pm
Commerce City Civic Center
7887 E. 60th Avenue
Commerce City, CO 8002

Needs Assessment Workshop
Thursday, May 5, 2016
6:00 pm – 7:30 pm
Commerce City Recreation Center
6060 E. Parkway Drive
Commerce City, CO 80022

Senior Focus Group
Tuesday, May 3, 2016
12:00 pm
Commerce City Recreation Center
6060 E. Parkway Drive
Commerce City, CO 80022

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Youth Focus Group
Thursday, May 5, 2016
6:30 pm
Commerce City Civic Center
7887 E. 60th Avenue
Commerce City, CO 80022

Input received through the needs assessment workshops, focus groups, stakeholder interviews, and community survey were used to develop the priorities, goals, and projects identified in the Strategic Plan. Future CDBG projects will be identified based on these priorities and goals, and thus informed by the citizen participation and stakeholder consultation processes.

Following the development of the draft 2016-2021 Consolidated Plan and 2016-2017 Annual Action Plan, the City of Commerce City will hold a 30-day public comment period during July 2016. During this time, copies of the draft reports will be available for public inspection. Residents and other stakeholders will be able to provide written comments by email, mail, or hand delivery. A public hearing to present key plan components and receive comments will also be held. Input received during the public comment period and the public hearing will be added to this section and appended to this document prior to completion of the final Consolidated Plan and Annual Action Plan.

A summary of citizen participation outreach efforts and responses received is shown in Table 4, with complete survey results available as an appendix.

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Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of Response/ Attendance	Summary of Comments Received	Summary of Comments Not Accepted
1	Needs Assessment Workshops	Minority residents, persons with limited English proficiency, persons with disabilities, assisted housing residents, and broad community; Housing and service providers; Community development practitioners; Boards and commissions members	3 workshops with 19 attendees	Top needs identified by participants: • Connectivity between north and south • Rehabilitation or removal of substandard or dilapidated property in the Core City • Affordable housing • Short-term emergency housing • Senior housing/aging in place • Lawn care and maintenance assistance for seniors • Volunteer program • Workforce housing to attract employers • Expanded shopping and dining options • Commercial opportunity in Derby	None
2	Senior Focus Group	Senior residents and persons with disabilities	35 attendees	Top needs identified by participants: • Affordable apartments in good condition • Road repairs • Disabled veterans' programs • Assistance with home and yard maintenance for seniors • Projects that address low income needs versus general city maintenance	None

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3	Youth Focus Group	Youth	12 attendees	Top needs identified by participants: • Town center with shopping and dining • Revitalization of older commercial areas • Bike and running trails • Streetlights and crosswalks • Expanded public facilities (recreation center, library, Boys and Girls Club) • Support for high school activities (Future Farmers of America, Friends First) • Property maintenance help for seniors • Housing for seniors • Improvements to old housing and apartments	None
4	Stakeholder Interviews	Housing and service providers; Community development practitioners; Elected officials	21 interviewees	Top needs identified by participants: • Affordable housing (rental and owner) • Coordination among City and nonprofits • Housing for the homeless • First-time homebuyer assistance • Senior housing and housing maintenance • Housing for people with disabilities • Minor home repair • Rental unit rehabilitation • Job training and job search assistance • Sidewalks, bike paths, and streetlights • Improved transportation/connectivity • Fair housing • Food programs, esp. during summer • Assistance for immigrants and persons with limited English proficiency • Access to technology • Small business assistance/attraction • Regulatory changes to promote affordable housing	None

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5	Community Needs Survey	Minority residents, persons with limited English proficiency, persons with disabilities, assisted housing residents, and broad community; Housing and service providers; Community development practitioners; Boards and commissions members; Elected officials	210 respondents	Top needs identified by participants: • Street, road, or sidewalk improvements • Neighborhood cleanups • Drug abuse/crime prevention • Elderly housing • Community parks, gyms, and rec fields • Youth services • Community centers • Redevelopment of abandoned property • Home improvement assistance • Energy efficiency improvements • Family housing • Employment training • Homelessness prevention	None
6	Newsletter Article and Ad and Flyers	Minority residents, persons with limited English proficiency, persons with disabilities, assisted housing residents, and broad community; Housing and service providers; Community development practitioners; Boards and commissions members	Participation opportunities were advertised in the *Commerce City Connected delivered to every household in the City*and via English and Spanish flyers placed in public locations	None	None

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7	Internet Outreach	Minority residents, persons with limited English proficiency, persons with disabilities, assisted housing residents, and broad community; Housing and service providers; Community development practitioners; Boards and commissions members	Participation opportunities were advertised on the Commerce City website and Facebook page	None	None

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8	Public Comment Period	Minority residents, persons with limited English proficiency, persons with disabilities, assisted housing residents, and broad community; Housing and service providers; Community development practitioners; Boards and commissions members	TBD	TBD	TBD
9	Public Hearing	Minority residents, persons with limited English proficiency, persons with disabilities, assisted housing residents, and broad community; Housing and service providers; Community development practitioners; Boards and commissions members	TBD	TBD	TBD

Table 4 – Citizen Participation Outreach

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Needs Assessment

NA-05 Overview

Needs Assessment Overview

Based on HUD provided figures, the following data indicates the number and percentage of renters and homeowners who may be subject to housing problems, based on income level. The current economic climate has substantially increased the number of households experiencing housing problems and cost burdens nationally and throughout most regions.

HUD receives a special tabulation of data from the U.S. Census Bureau's American Community Survey (ACS) that is largely not available through standard Census products. This special dataset provides counts of the numbers of households that fit certain combinations of HUD-specified criteria such as housing needs, HUD-defined income limits (primarily 30, 50, and 80 percent of area median income) and household types of particular interest to planners and policy-makers. This data, known as the Comprehensive Housing Affordability Strategy (CHAS) data, is used by local governments for housing planning and as part of the Consolidated Planning process.

Assessing the specific housing needs of Commerce City is critical to creating a realistic and responsive affordable housing strategy. As such, an assessment of the City's affordable rental and single family homes was conducted based on available demographic, economic and housing data for Commerce City utilizing HUD's eCon Planning Suite within the Integrated Disbursement and Information System (IDIS). The eCon Planning Suite pre-populates housing and economic data to assist jurisdictions in setting funding priorities in the Consolidated Plan and Annual Action Plan. Highlights of this assessment are provided in this section.

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NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

Summary of Housing Needs

According to the 2008-2012 5-Year American Community Survey, Commerce City was home to 45,537 residents and 14,294 households, as shown in Table 5. Since the 2000 Census, the city more than doubled, adding 24,546 persons (a 117% growth rate) and 7,626 households (114% growth). There rates are significantly above the Adams County and state of Colorado population growth rates of 22% and 17%, respectively. Census estimates put Commerce City's population at 53,696 as of July 1, 2015.

The median household income also showed a considerable increase – from $33,680 in 2000 to $60,963 in 2012 (an 81% climb). Compared to Adams County ($56,663) and Colorado ($58,244) median incomes, Commerce City's median is slightly higher.

Demographics	Base Year: 2000	Most Recent Year: 2012	% Change
Population	20,991	45,537	117%
Households	6,668	14,294	114%
Median Income	$33,680	$60,963	81%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2008-2012 ACS (Most Recent Year)

Number of Households Table

Table 6 identifies income levels for a variety of household types, including small families (2-4 members), large families (5 or more members), households with young children, and households with seniors. As shown, 6,110 households in Commerce City have low or moderate incomes (under 80% of HUD Area Median Income (HAMFI)), and together they comprise 43% of the city's households. Looking at income by household type shows about one-third of small families and 59% of large families have low or moderate incomes. Nearly half (46%) of households with young children have incomes below 80% HAMFI. Households with one or more members over age 75 have the lowest incomes – nearly 70% of this group have low or moderate incomes, not surprising given that most are no longer earning wages from employment.

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	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households*	2,010	1,500	2,600	1,780	6,400
Small Family Households*	720	455	1,295	875	4,050
Large Family Households*	450	495	535	315	700
Household contains at least one person 62-74 years of age	290	270	270	189	805
Household contains at least one person age 75 or older	215	150	205	70	190
Households with one or more children 6 years old or younger*	685	495	1,010	505	2,065

* The highest income category for these family types is >80% HAMFI.

Table 6 - Total Households Table

Data Source: 2008-2012 CHAS

Housing Needs Summary Tables

Housing needs by tenure and income are provided in Table 7 through **Error! Reference source not found.** followed by a discussion of these needs. HUD defines four housing needs, which are quantified in the proceeding tables:

1. Housing units lacking complete kitchen facilities;
2. Housing units lacking complete plumbing facilities;
3. Overcrowded households (households with more than one person per habitable room); and
4. Cost burdened households (households spending more than 30% of their monthly income on monthly housing costs, including rent, mortgage payments, utilities, insurance, taxes, and homeowners' association fees).

Additionally, HUD identifies the following four severe housing needs:

1. Housing units lacking complete kitchen facilities;
2. Housing units lacking complete plumbing facilities;
3. Severely overcrowded households (households with more than 1.5 persons per habitable room); and
4. Severe cost burdened households (households spending more than 50% of their monthly income on monthly housing costs, including rent, mortgage payments, utilities, insurance, taxes, and homeowners' association fees).

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1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Number of Households										
Substandard Housing – Lacking complete plumbing or kitchen facilities	35	0	0	0	35	0	0	0	0	0
Severely Overcrowded – With >1.51 people per room (and complete kitchen and plumbing)	110	45	10	20	185	40	10	0	0	50
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	100	80	100	105	385	15	50	60	0	125
Housing cost burden greater than 50% of income (and none of the above problems)	615	95	0	0	710	370	300	365	70	1,105
Housing cost burden greater than 30% of income (and none of the above problems)	270	360	290	50	970	50	135	535	670	1,390
Zero/negative Income (and none of the above problems)	40	0	0	0	40	15	0	0	0	15

Table 7 – Housing Problems Table

Data Source: 2008-2012 CHAS

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2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Number of Households										
Having 1 or more of four housing problems	855	220	110	125	1,310	425	355	425	70	1,275
Having none of four housing problems	545	415	820	290	2,070	125	510	1,245	1,300	3,180
Household has negative income, but none of the other housing problems	40	0	0	0	40	15	0	0	0	15

Table 8 – Housing Problems 2

Data Source: 2008-2012 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Number of Households								
Small Related	420	210	170	800	210	120	385	715
Large Related	280	155	80	515	165	150	205	520
Elderly	230	60	10	300	94	144	115	353
Other	195	55	30	280	40	50	240	330
Total need by income	**1,125**	**480**	**290**	**1,895**	**509**	**464**	**945**	**1,918**

Table 9 – Cost Burden > 30%

Data Source: 2008-2012 CHAS

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4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Number of Households								
Small Related	290	50	0	340	170	100	135	405
Large Related	190	50	0	240	145	135	45	325
Elderly	120	0	0	120	80	49	20	149
Other	155	15	0	170	10	35	200	245
Total need by income	**755**	**115**	**0**	**870**	**405**	**319**	**400**	**1,124**

Table 10 – Cost Burden > 50%

Data Source: 2008-2012 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Number of Households										
Single family households	175	115	75	20	385	44	4	30	0	78
Multiple, unrelated family households	64	14	35	105	218	10	55	10	0	75
Other, non-family households	0	0	0	0	0	0	0	20	0	20
Total need by income	**239**	**129**	**110**	**125**	**603**	**54**	**59**	**60**	**0**	**173**

Table 11 – Crowding Information

Data Source: 2008-2012 CHAS

Describe the number and type of single person households in need of housing assistance.

Estimates of the number of non-elderly single person households in need of assistance are shown in Table 9 and Table 10 in the "other" category. Table 9 shows that there an estimated 280 non-elderly single person renter households with low or moderate income households who spend more

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than 30% of their income on housing. The majority (195 households or 70%) have very low incomes (under 30% AMI). For owners, there are an estimated 330 non-elderly single person households with a cost burden; most have moderate income from 50-80% AMI (240 households or 73%).

Of single person households with a cost burden, 61% of renters (170 households) and 74% of owners (245 households) also have a severe cost burden, meaning they spend over 50% of their income on housing.

Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.

According to the 2010-2014 5-Year American Community Survey, there are an estimated 4,340 disabled persons in Commerce City, comprising 9% of its population. While housing need is not estimated for the disabled population, the ACS does provide poverty rates by disability status, which can serve as an indicator of potential need, given that households with low incomes are more likely to have a housing need. For persons age 18 to 64, 25% of the disabled population is impoverished, compared to 12% of the non-disabled population. For seniors, the poverty rate for disabled persons is 16% compared to 17% for those without a disability. Thus, poverty rates suggest that disabled adults under 65 in Commerce City would be more likely to have difficulty affording housing than their non-disabled counterparts. Additionally, a limited supply of accessible housing and the cost of making needed modifications represent housing needs for Commerce City's disabled population.

The most common disability in Commerce City is an ambulatory difficulty, which affects 47% of the city's disabled population. Housing needs for persons with ambulatory difficulties may include accessibility improvements such as ramps, widened hallways and doorways, and installation of grab bars, along with access to community services such as transit. Persons with cognitive difficulties make up the second largest share of the disabled population (38%). For some people with these disabilities, housing in a group home or other supportive setting with services may be needed.

No data regarding the incidence of domestic violence, dating violence, sexual assault, and stalking are available for Commerce City. The *2014 State of Homelessness Report* discussed domestic violence as a contributing factor for homelessness. According to the report, 11% of homeless persons in metro Denver were homeless due to abuse or violence in the home as of the 2014 Point-In-Time count. The National Law Center on Homelessness reports that domestic violence is the leading cause of homelessness among women. In Colorado, 10,102 persons were turned away from domestic violence emergency shelters in 2012 due to lack of space, with many victims left with the options of returning to an abusive home or becoming homeless.

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What are the most common housing problems?

As shown in Table 7, a total of 2,285 renter households and 2,670 owner households with incomes at or below the area median income experience one or more housing problems. Comparing these numbers with the total households with incomes under 100% AMI (as provided in Table 6) indicates that 63% have one or more housing needs. At low and moderate incomes, there are 4,040 households with needs, representing 66% of total households with incomes at or below 80% AMI.

By far, the most common housing problems in Commerce City for both owners and renters are cost burdening and severe cost burdening. Table 9 reveals that 1,895 low and moderate income renter households spend more than 30% of their income on housing, as do 1,918 low and moderate income owner households. Taken together, there are 3,813 cost burdened households with incomes under 80%, constituting 62% of that income group. Of these, 1,994 households have a severe cost burden (870 renters and 1,124 owners), comprising 33% of total low and moderate income households, as Table 10 displays.

Crowding (more than one person per room) affects 478 renters and 273 owners with low and moderate incomes, or 11% of all households in that income group (Table 11), a considerably lower share than are affected by cost burdens or severe cost burdens.

Substandard housing (lacking complete plumbing or kitchen facilities) affects the smallest number of low and moderate income households in Commerce City: 35 renters and no owners, or 1% of all households with incomes under 80% AMI, according to Table 7.

Are any populations/household types more affected than others by these problems?

Renters in Commerce City are more likely to be affected by substandard living conditions and overcrowding than owners. Thirty-five renters live in substandard conditions while no owners do. The number of crowded low/moderate income renters (478 households) is more than double the number of overcrowded owners (173 households). However, Commerce City's cost burdened households are roughly evenly split between low/moderate income owners (1,918 households or 50%) and low/moderate income renters (1,895 or 50%). Owners outnumber renters relative to severe cost burdens (1,124 owner households versus 870 renter households).

For renters, more than half of cost burdened households have incomes under 30% AMI; one-quarter have incomes from 30 to 50% AMI, and the remaining 15% have incomes in the moderate range. For owners, cost burdens are slightly more evenly distributed amongst income bands: about one-quarter of cost burdened households have incomes under 30%, another quarter have incomes from 30-50% AMI, and half have incomes from 50-80% AMI.

Looking at needs by household type, small families (2 to 4 persons) make up the largest share of low and moderate income renters with a cost burden at 42%, followed by large families (5 or more persons) at 27%. Trends are similar for owners: small families make up 37% of households with a

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cost burden and large families constitute 27%. Comparing data in Table 9 with total households by type in Table 6 shows that 61% of small low/moderate income families are cost burdened (1,515 out of 2,470 households). A higher share of large low/moderate income families face a cost burden – 1,035 out of 1,480 households, or 70%.

Finally, overcrowded renter households are more likely to be single family households than multiple, unrelated families (Table 11). The former make up 64% of overcrowded households, and the latter constitute 36%. For owners, the number of single family overcrowded households (78) is roughly equal to the number of households with multiple, unrelated families (75). However, given that the vast majority of Commerce City households are single families, overcrowding is more likely to affect unrelated families sharing a home (i.e., "doubling up").

Describe the characteristics and needs of low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance

Individuals with an imminent risk of residing in shelters or becoming unsheltered typically have a combination of financial factors present in their lives: lack of living wage jobs, rents that are more than 30 or 50% of their incomes, and high childcare, medical, or transportation costs. In addition to these factors, individuals at risk of homelessness often have additional issues present such as family conflicts, domestic violence, doubling up with family members or friends, housing with code or safety violations, households members with a disability, criminal histories, histories of mental health issues or substance abuse, difficulty navigating systems to access public benefits or community services, and prior experiences with homelessness.

The 2014 Point-In-Time homeless count for Adams County also included a count of persons at risk for homelessness. This survey revealed 497 persons at risk as of the night of the count; according to respondents, common contributing factors included mental illness, serious medical or physical conditions, and alcohol/drug abuse.

For formerly homeless families and individuals nearing the termination of assistance, a top need is to secure affordable permanent housing. Other needs include access to Social Security disability and other benefits; linkages to health, mental health, and legal services; continued case management and supportive services; and access to mainstream job training, employment and education programs, and supportive employment agencies.

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If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:

The Metro Denver Homeless Initiative's *2014 State of Homelessness Report* defines an individual or family as "at-risk of homelessness" if they reported staying in the following locations on the night of the Point-In-Time count:

- Temporarily with family or friends;
- In a hotel or motel paid for by self;
- Jail/prison/juvenile detention;
- Hospital, psychiatric hospital, substance abuse treatment program, halfway house;
- Facing eviction from permanent supportive housing;
- Facing eviction from apartment or house including Section 8;
- Staying "somewhere else" and said they are homeless; and
- Staying "somewhere else" and facing eviction.

Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness

According to the *2014 State of Homelessness Report*, the most fundamental risk factor for homelessness is extreme poverty. In addition to poverty, other characteristics associated with the risk of homelessness include single women with children; people without support networks such as unaccompanied youth, youth aging out of foster care, persons who were previously homeless, and persons exiting systems without a support network; and households paying more than 50% of their income for housing. In Commerce City, there are 755 renter households with incomes under 30% AMI paying more than half of their income for housing who have elevated risks of homelessness. The city also has 64 renter households with extremely low incomes comprised of multiple, unrelated families living together in crowded conditions, another indicator of risk of homelessness.

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NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

According to HUD, a disproportionately greater need exists when members of a racial or ethnic group at a given income level experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Table 12 through Table 15 identify the number of households experiencing one or more of the four housing problems by householder race and ethnicity and income level. The four housing problems include: (1) cost burden (paying more than 30% of income for housing costs); (2) overcrowding (more than one person per room); (3) lacking complete kitchen facilities; and (4) lacking complete plumbing facilities. Income classifications include extremely low income (under 30% of Area Median Income (AMI)); low income (30-50% AMI); moderate income (50-80% AMI); and middle income (80-100% AMI).

0%-30% of Area Median Income

At extremely low incomes, 80% of Commerce City households have one or more housing problems (1,600 households, as shown in Table 12). Asians have a disproportionately greater need. All of the four Asian households with incomes below 30% AMI have at least one housing need (100%).

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,600	350	55
White	610	180	30
Black / African American	60	50	0
Asian	4	0	0
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	910	100	25

Table 12 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2008-2012 CHAS

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*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

30%-50% of Area Median Income

Seventy-two percent (72%) of Commerce City households with incomes from 30 to 50% AMI have one or more housing problems (1,070 households, as shown in Table 13). American Indians and Alaska Natives face a disproportionate need at this income level. All of the 25 American Indian and Alaska Native households with low incomes have a housing need (100%).

Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,070	425	0
White	340	180	0
Black / African American	0	0	0
Asian	0	4	0
American Indian, Alaska Native	25	0	0
Pacific Islander	0	0	0
Hispanic	680	240	0

Table 13 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2008-2012 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

50%-80% of Area Median Income

As shown in Table 14, about half of Commerce City households with moderate incomes have one or more housing needs (1,355 households or 52%). Two groups face a disproportionate need. Sixty-two percent of White households with moderate incomes have one or more housing needs (810 households), as do 100% of the 60 Asian households in this income range.

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Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,355	1,250	0
White	810	500	0
Black / African American	30	70	0
Asian	60	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	450	670	0

Table 14 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2008-2012 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

80%-100% of Area Median Income

About one-half of middle income households in Commerce City have one or more housing needs (915 households or 51%). All of the 40 Asian households at this income level have a housing problem, indicating a disproportionate need (100%).

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Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	915	865	0
White	490	580	0
Black / African American	0	14	0
Asian	40	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	375	265	0

Table 15 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2008-2012 CHAS

*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Discussion

Overall, CHAS data regarding housing problems by income level and race and ethnicity shows that need is more common at low incomes – 80% of extremely low income households and 72% of low income households face one or more housing problems. At moderate incomes, this rate falls to 52%. There is virtually no change in the rate of housing needs for middle income households, 51% of whom experience one or more housing problems.

Five groups experience a disproportionately greater rate of housing need than the city as a whole:

- White households with moderate incomes. Sixty-two percent (62%) of White households with incomes from 50-80% AMI have a housing need, versus 52% of households citywide;
- American Indians and Alaska Natives with low incomes. All of the 25 American Indian or Alaska Native households with incomes from 30 to 50% AMI have a housing need, compared to 72% of households citywide; and
- Asian households at extremely low, moderate, and middle incomes. All extremely low income Asian households have a housing need, compared to 80% of all households. All moderate income Asian households also have one or more needs versus 52% of households citywide. Finally, at middle incomes, 100% of Asian households have a need compared to 51% citywide.

OMB Control No: 2506-0117 (exp. 07/31/2015)

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NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

This section examines severe housing need by income level and householder race and ethnicity. Like the preceding analysis, this section uses HUD's definition of disproportionately greater need, which occurs when members of a racial or ethnic group at a given income experience housing problems at a greater rate (10 percentage points or more) than the income level as a whole. Table 16 through Table 19 identify the number of households experiencing one or more severe housing problems by householder race and ethnicity and income level. The four severe housing problems include: (1) severe cost burden (paying more than 50% of income for housing); (2) severe overcrowding (more than 1.5 persons per room); (3) lacking complete kitchen facilities; and (4) lacking complete plumbing facilities. Income classifications include extremely low income (under 30% of Area Median Income (AMI)); low income (30-50% AMI); moderate income (50-80% AMI); and middle income (80-100% AMI).

0%-30% of Area Median Income

At extremely low incomes, 64% of households in Commerce City experience a severe housing need (1,275 households). Asian households face severe needs a disproportionately greater rate, with 100% of the four Asian households having one or more severe housing needs.

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,275	670	55
White	525	260	30
Black / African American	45	65	0
Asian	4	0	0
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	705	305	25

Table 16 – Severe Housing Problems 0 - 30% AMI

Data Source: 2008-2012 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

30%-50% of Area Median Income

At low incomes, 38% of Commerce City households have a severe housing need (575 households). No racial or ethnic group has a disproportionately high rate of severe housing needs.

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	575	930	0
White	155	355	0
Black / African American	0	0	0
Asian	0	4	0
American Indian, Alaska Native	0	25	0
Pacific Islander	0	0	0
Hispanic	415	505	0

Table 17 – Severe Housing Problems 30 - 50% AMI

Data Source: 2008-2012 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

50%-80% of Area Median Income

One-fifth (21%) of moderate income households in Commerce City have one or more severe housing needs (535 households). No racial or ethnic group has a disproportionately greater rate of severe housing needs.

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	535	2,065	0
White	280	1,030	0
Black / African American	0	100	0
Asian	15	45	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	240	880	0

Table 18 – Severe Housing Problems 50 - 80% AMI

Data Source: 2008-2012 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

80%-100% of Area Median Income

Eleven percent (11%) of middle income Commerce City households experience a severe housing need. No racial or ethnic group face severe housing problems at a disproportionately greater rate.

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	195	1,590	0
White	70	1,000	0
Black / African American	0	14	0
Asian	0	40	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	125	520	0

Table 19 – Severe Housing Problems 80 - 100% AMI

Data Source: 2008-2012 CHAS

*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

Discussion

Overall, severe housing problems are most common at lower income levels. About two-thirds (64%) of Commerce City households with incomes below 30% AMI face a severe need, as do 38% of low income households. As incomes increase, rates of severe housing problems decline, dropping to 21% at moderate incomes and 11% for the middle income group. These rates indicate that for extremely low and low income households, finding affordable housing in Commerce City is difficult.

Only one racial or ethnic group experiences severe housing need at a disproportionately higher rate than the overall population. All of the four extremely low income Asian households had a severe housing need (100%), compared to 64% of all households at this income level.

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NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

Introduction

While the preceding sections assessed all housing and severe housing problems by race and ethnicity, **Table 20** focuses only on what share of their incomes households spend on housing. Data is broken down into groups spending less than 30% of income on housing costs, those paying between 30 and 50% (i.e., with a cost burden), and those paying over 50% (i.e., with a severe cost burden). The final column, "no/negative income," identifies households without an income, for whom housing as a share of income was not calculated. Note that households with no or negative incomes made up less than 1% of each racial or ethnic group.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Number of Households				
Jurisdiction as a whole	8,810	3,325	2,094	60
White	5,185	1,925	970	30
Black / African American	480	85	20	0
Asian	165	85	25	0
American Indian, Alaska Native	50	25	0	0
Pacific Islander	0	0	0	0
Hispanic	2,825	1,160	1,055	25
Share of Total Households by Race and Ethnicity				
Jurisdiction as a whole	62%	23%	15%	0%
White	64%	24%	12%	0%
Black / African American	82%	15%	3%	0%
Asian	60%	31%	9%	0%
American Indian, Alaska Native	67%	33%	0%	0%
Pacific Islander	N/A	N/A	N/A	N/A
Hispanic	56%	23%	21%	0%

Table 20 – Greater Need: Housing Cost Burdens AMI

Data Source: 2008-2012 CHAS

OMB Control No: 2506-0117 (exp. 07/31/2015)

Discussion

As Table 20 shows, 23% of all households in Commerce City spend between 30 and 50% of their income on housing costs. Looking at households by race and ethnicity, percentages within this housing cost bracket range from 15% for African Americans to 33% for American Indians and Alaska Natives. The latter group has a disproportionately high rate of cost burden (33% versus 23% for all Commerce City households).

Citywide, 15% of households spend over 50% of their income on housing costs. Rates of severe cost burdens by race and ethnicity range from 0% for American Indian and Alaska Natives to 21% for Latinos. No groups face a disproportionate rate of severe cost burdens.

Combining the cost burdened and severe cost burdened households shows that there are a total of 5,419 households in Commerce City spending more than 30% of their income on housing, which constitutes 38% of the city's total households. No population segments are disproportionately likely to spend over 30% of their income on housing.

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NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)

Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?

Table 12 through Table 20 identified seven instances of disproportionately greater need, which are summarized below:

- Asian households are most affected by housing needs and severe needs. Of the ten income and need categories examined, Asian households are disproportionately affected by housing needs in four of them. At extremely low incomes, 100% of the four Asian households have a severe housing need. In comparison, 80% of extremely low income Commerce City households face a housing problem and 64% face a severe housing problem. All of the 60 Asian households with moderate incomes and all of the 50 Asian households with middle incomes have one or more housing needs.

- American Indian and Alaska Native households with low incomes (30-50% AMI) face disproportionately high rates of housing needs. All of the 25 American Indian and Alaska Native households in this income bracket have one or more housing problems, compared to 72% of households citywide. American Indians and Alaska Natives also face cost burdens at a disproportionately high rate – 33% of these households spend between 30 and 50% of their income on housing versus 23% of households citywide.

- Moderate income White households have a disproportionately high rate of housing problems. Sixty-two percent of White households with incomes from 50 to 80% AMI have one or more housing needs compared to 52% of all households at this income level.

If they have needs not identified above, what are those needs?

Stakeholder input echoed the findings of the CHAS data, indicating that affordability is the biggest housing need in Commerce City. Interview participants noted the need for a greater variety of housing types including more apartments. According to interviewees, affordable housing is concentrated in south Commerce City, with product in the north being primarily higher priced single-family homes. In addition to housing needs, stakeholders listed transportation, food, and healthcare as other costs with which low and moderate income families struggle.

For extremely low, low, and moderate income households, a lack of financial resources such as savings, collateral, and credit are factors affecting the ability to obtain home mortgage loans. For existing homeowners, especially seniors, stakeholders identified maintenance and minor rehabilitation of aging single-family housing as a crucial need related to improving and maintaining the affordability and safety of the city's existing housing stock. Interviewees also noted that as Commerce City's population ages, providing a range of housing options for seniors – including assisting them to age in place – will become a more pronounced need.

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Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?

According to the 2010-2014 American Community Survey, Asians and American Indians/Alaska Natives (the minority racial/ethnic groups with disproportionate levels of housing need) collectively make up 3% of Commerce City's population. The Asian population of 1,226 constitutes 3% of the city's total. Asians residents are most heavily concentrated in two census tracts in north Commerce City: tract 85.37 (roughly bounded by Highway 85, Havana Street, Highway 2, and Peoria Street) and tract 85.38 (roughly bounded by Second Creek, 112th Avenue, Tower Road, and East 88th Avenue). Asians make up 6% of both of these tracts, and together they comprise 54% of Commerce City's total Asian population.

With a population of only 79 residents, American Indians and Alaska Natives comprise less than 1% of Commerce City's population. They make up less than 1% of every tract with the exception of tract 88.02. While this tract extends west into Adams County, the portion of it in Commerce City lies between I-76, East 96th Avenue, Highway 2, and East 88th Avenue. It is home to 287 American Indian and Alaska Natives, although the majority likely live outside of Commerce City municipal limits.

Finally, White residents make up a large share of Commerce City, with a population of 22,712 (47% of the city). While Whites are not concentrated in specific census tracts, they make up a larger share of tracts in north Commerce City than tracts in the south. All tracts north of East 96th Avenue have White populations of 50% or more; tracts south of East 96th Avenue range from 28% to 43% White.

Maps showing Commerce City's Asian, American Indian and Alaska Native, and White population by census tract are provided on the following pages.

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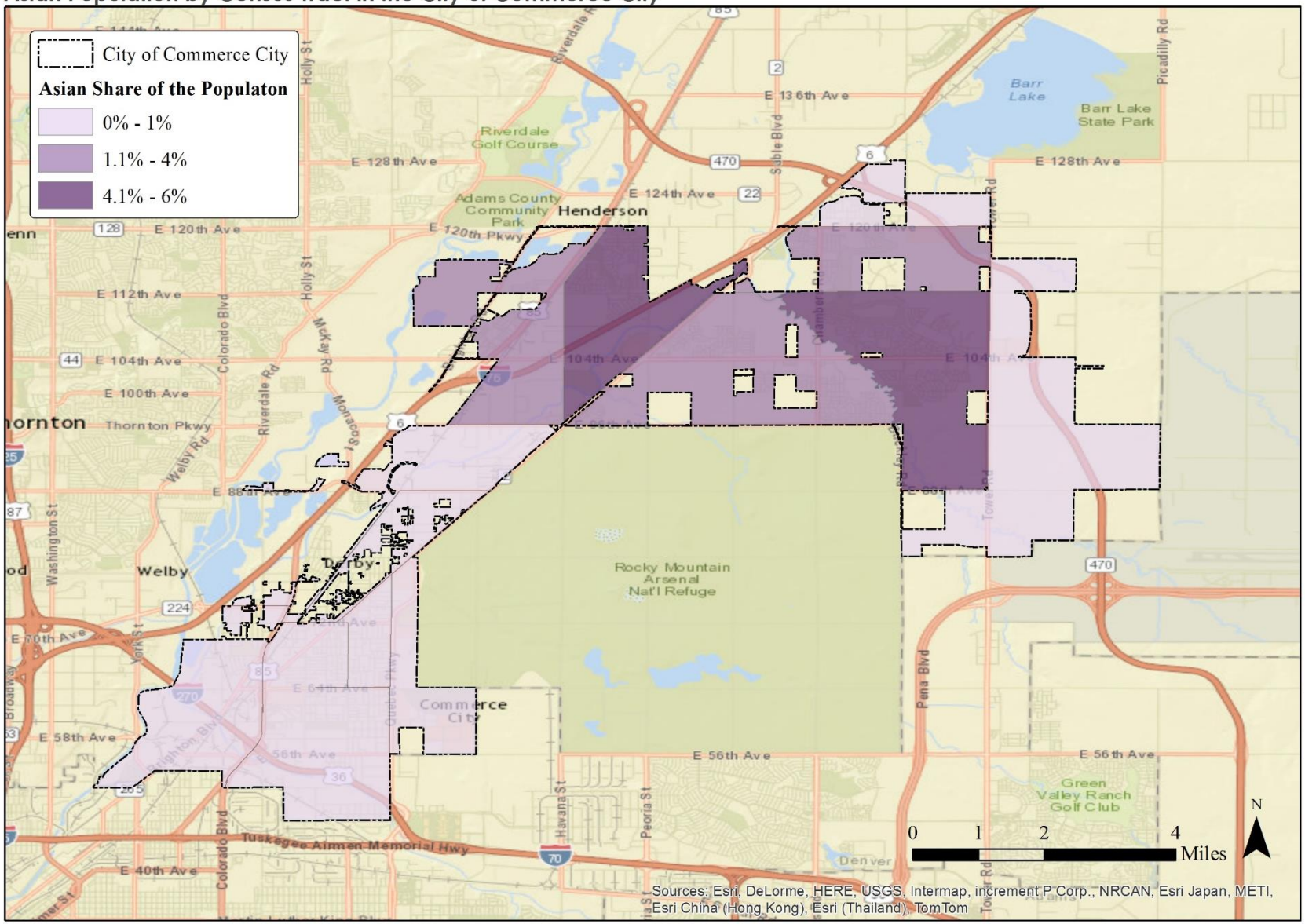
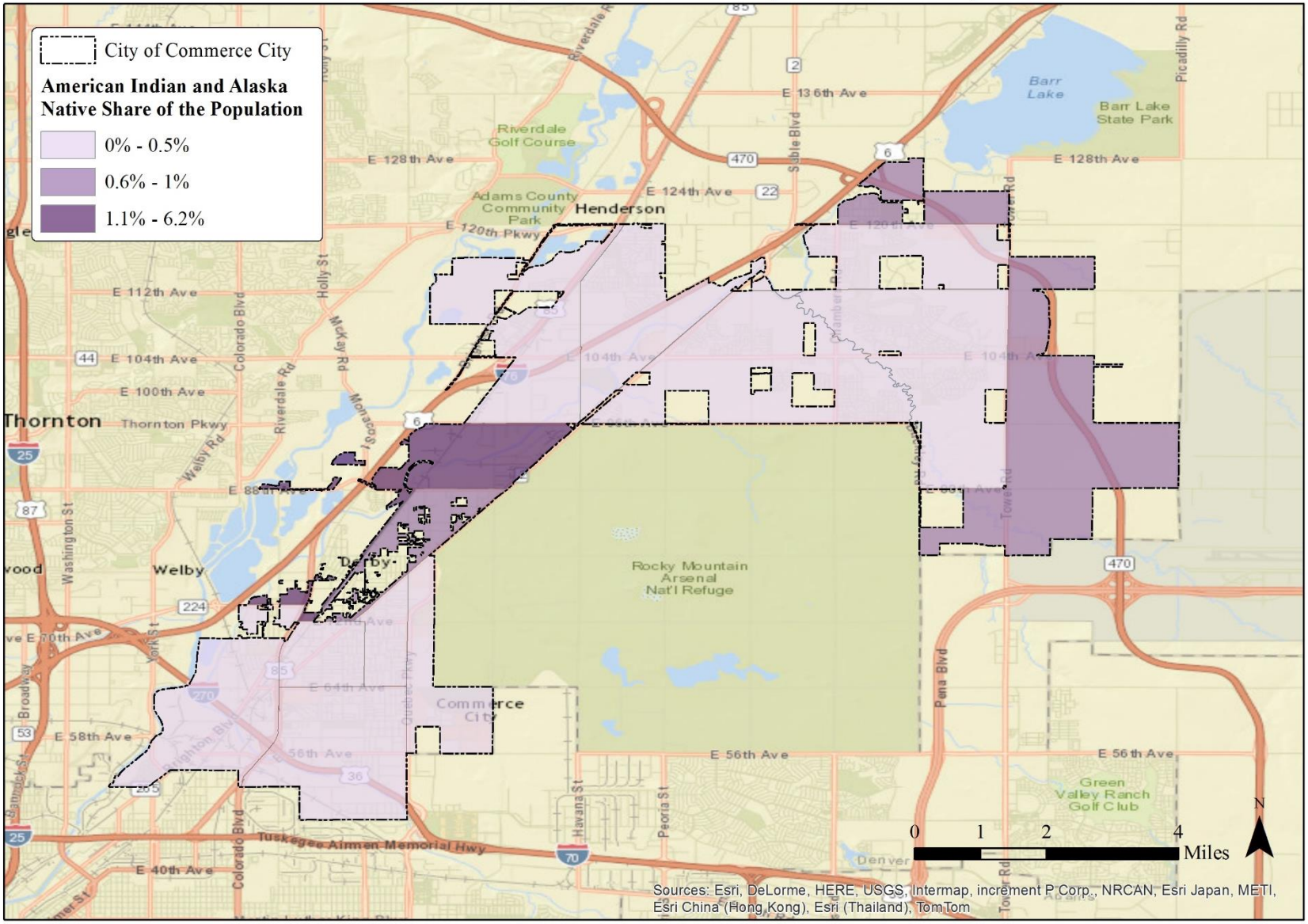
Asian Population by Census Tract in the City of Commerce City



Source: 2010-2014 5-Year American Community Survey Table B03002

OMB Control No: 2506-0117 (exp. 07/31/2015)

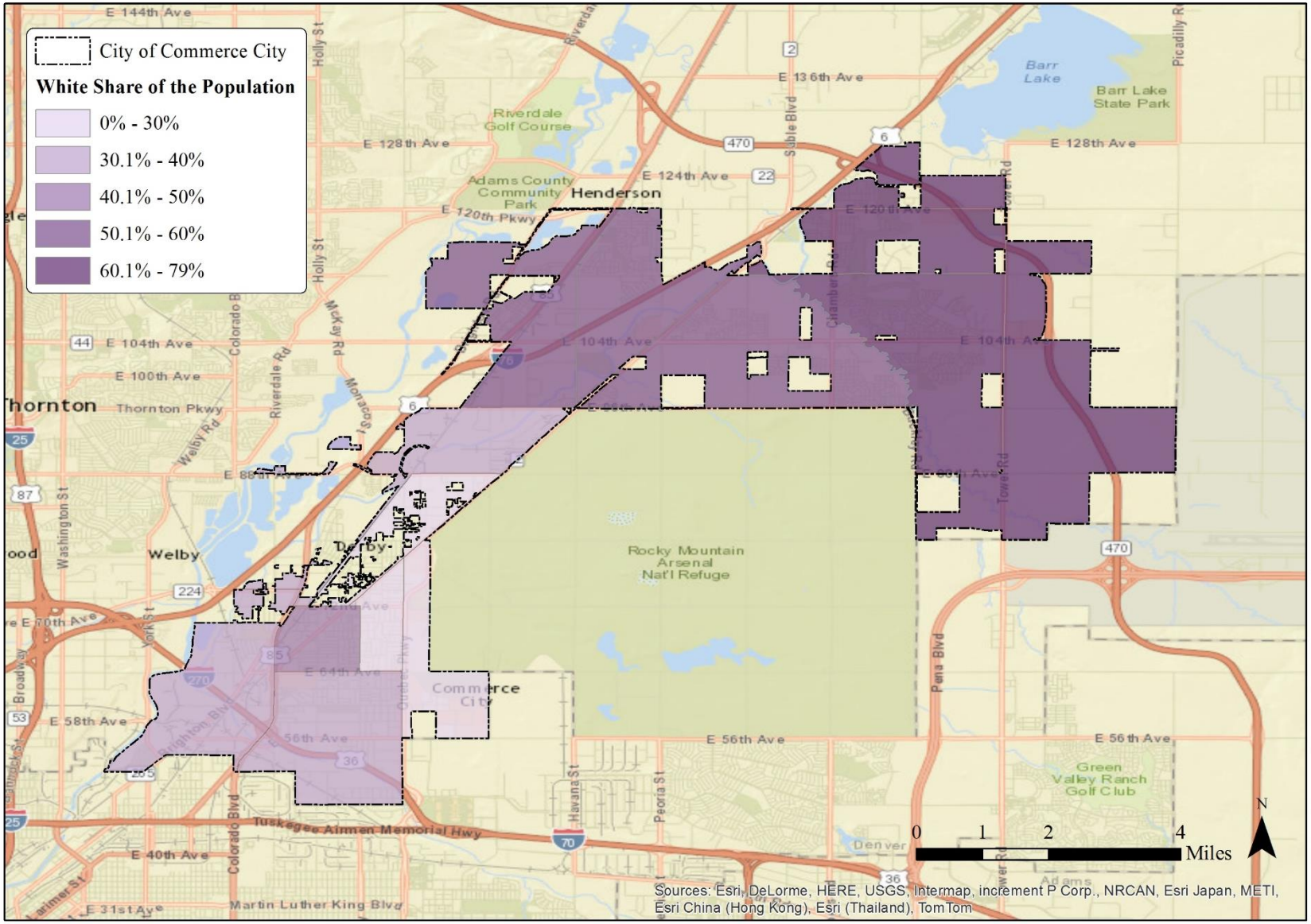
American Indian and Alaska Native Population by Census Tract in the City of Commerce City



Source: 2010-2014 5-Year American Community Survey Table B03002

OMB Control No: 2506-0117 (exp. 07/31/2015)

White Population by Census Tract in the City of Commerce City



Source: 2010-2014 5-Year American Community Survey Table B03002

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NA-35 Public Housing – 91.205(b)

Introduction

Commerce City residents are served by both the Adams County Housing Authority (ACHA) and the Commerce City Housing Authority (CCHA). ACHA 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. CCHA is not a HUD-funded public housing authority and is therefore not subject to HUD reporting and monitoring requirements. It has an ownership interest in 226 affordable housing units throughout Commerce City and administers approximately 100 Housing Choice Vouchers. The data in the tables in the following section is provided by a HUD source and thus does not include CCHA vouchers or units.

Totals in Use

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	42	1,374	4	1,333	1	36	0

Table 21 - Public Housing by Program Type

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Data Source: PIC (PIH Information Center)

Characteristics of Residents

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project-based	Tenant-based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	9,122	11,529	7,887	11,617	8,088	8,789
Average length of stay	0	0	4	6	0	6	0	0

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	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project -based	Tenant -based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Household size	0	0	1	2	1	2	2	3
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	41	218	0	218	0	0
# of Disabled Families	0	0	0	280	2	277	0	1
# of Families requesting accessibility features	0	0	42	1,374	4	1,333	1	36
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 22 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Race of Residents

	Program Type								
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	40	1,167	2	1,130	1	34	0
Black/African American	0	0	0	146	0	144	0	2	0
Asian	0	0	2	27	0	27	0	0	0

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Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
American Indian/Alaska Native	0	0	0	29	2	27	0	0	0
Pacific Islander	0	0	0	5	0	5	0	0	0
Other	0	0	0	0	0	0	0	0	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 23 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	21	780	1	768	0	11	0
Not Hispanic	0	0	21	594	3	565	1	25	0

***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

Table 24 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:

The data from HUD PIH Information Center shows the Adams County Housing Authority as having 41 occupied units (occupied as of the date data was obtained for this report) of public housing, none of which are physically within Commerce City. Of the 41 units in Adams County, none were occupied by a family described as disabled. Of the County's voucher holders, 280 or 20.4% were disabled. The ACHA describes housing accessibility as a need, but one that may be overshadowed by the need for more affordable housing units in general. As described previously, the CCHA is not a HUD-funded agency and does not report data to HUD that would indicate the needs of applicants on its waiting lists. Input received from stakeholders indicates an especially acute need for housing for the elderly, a population group more likely to be disabled and to require accessibility features. Of all the housing needs listed in the Housing and Community Development Survey, elderly housing was the most highly ranked, listed as a high need by 52.9% of respondents.

Most immediate needs of residents of Public Housing and Housing Choice voucher holders

For those households receiving voucher assistance, the greatest needs are for opportunities to break the cycle of generational poverty. The ACHA invests over $600,000 per year on a "peer navigator" program designed to offer in-home parenting classes and financial coaching that may give families living in poverty a chance to escape generational poverty. Also important are services that encourage the upward mobility of voucher holders, enabling them to use their vouchers in high opportunity neighborhoods with better schools and job opportunities.

How do these needs compare to the housing needs of the population at large

While the above needs do relate to the population at large, voucher holders are uniquely positioned to take maximum advantage of mobility counseling and other antipoverty programs due to having access to relatively affordable housing in the neighborhoods of their choice. For the general population, these needs may be secondary to the need for decent affordable housing.

Discussion

While the ACHA plays a more significant role in the regional affordable housing context, the organization tends to focus more on Westminster and other Adams County communities, largely leaving the CCHA to lead public housing initiatives in Commerce City. The CCHA has a staff of just one full time employee and is therefore limited in its capacity. However, the CCHA's role as an investor and partner in local affordable housing efforts is a key opportunity to be leveraged. The CCHA's 2011 Strategic Plan names partnership to develop and meet local affordable housing targets as one of the Agency's five core goals.

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OMB Control No: 2506-0117 (exp. 07/31/2015)

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction

This section provides an assessment of Commerce City's homeless population and their needs. While the City of Commerce City does not conduct a count of homeless persons a Point-In-Time count was conducted for Adams County in January 2015 by the Metro Denver Homeless Initiative.

If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

The Metro Denver Homeless Initiative conducted a Point-In-Time count of homelessness in Adams County on the night of January 26, 2015. A total of 572 persons were counted, including 357 persons in households with children and 215 persons in households without children. The majority of homeless persons were sheltered: 55% were in transitional housing, 24% were in an emergency shelter, and 3% were in a domestic violence shelter or safe haven housing. About one-fifth of homeless persons (18%) were unsheltered.

In addition to counting homeless persons, the Metro Denver Homeless Initiative also administered a survey to gather information regarding characteristics of the homeless population and factors contributing to homelessness. Three hundred and nineteen (319) persons provided responses to the survey; a summary of results are provided below:

- One-quarter of respondents were newly homeless, meaning that this was their first incident of homelessness;
- Thirty-five percent (35%) of respondents had been homeless for more than a month but less than a year and 17% had been homeless for 1 to 3 years. Ten percent had been homeless for less than a month.
- Fifteen percent (15%) of the Adams County homeless population surveyed experienced chronic homelessness. HUD defines a person as "chronically homeless" if they are an unaccompanied homeless person with a disabling condition such as a substance abuse disorder, serious mental illness, developmental disability, or chronic physical illness, and have either been continually homeless for a year or more or had at least four episodes of homelessness in the past three years.
- Of survey participants, 56% were unaccompanied adults, 5% were unaccompanied youth (under age 25), 32% were households with children, and 7% were households without children.

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- A total of 38 youth (persons under age 25) participated in the survey. Of these, 47% were parenting youth and 44% were unaccompanied. The remaining 8% were members of non-parenting youth households.

- While the 2015 Point-In-Time count did not query respondents regarding veteran status, the 2014 count indicated that 14 of 215 homeless survey takers were veterans (7%).

- Top contributing factors to homelessness include an inability to pay rent/mortgage (affecting an estimated 25% of respondents), a lost job or lack of work (25%), and relationship problems or a family break-up (17%).

Nature and Extent of Homelessness: (Optional)

Adams County 2015 Point-In-Time Count						
Homeless Persons by Location						
	Sheltered				Unsheltered	Total
	Emergency Shelter	Transitional Housing	Domestic Violence Shelter	Safe Haven		
Total Persons	77	176	6	3	57	319
Percent of Total	24%	55%	2%	1%	18%	100%
Homeless Persons by Race and Ethnicity						
	Race				Hispanic Ethnicity (any race)	Total
	White	African American	American Indian/ Alaska Native	Other/ Multiple Races		
Total Persons	188	86	19	26	83	319
Percent of Total	59%	27%	6%	8%	26%	100%

Table 25 – Point-In-Time Homeless Count

Data Source: "Adams County 2015 PIT Summary" by Metro Denver Homeless Initiative, http://mdhi.org/wp-content/uploads/2010/07/Adams-County-2015.pdf

Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

While the 2015 Point-In-Time count did not query respondents regarding veteran status, the 2014 count indicated that 14 of 215 homeless survey takers were veterans (7%). Applying this rate to the 2015 total count of 572 indicates an estimated 40 homeless veterans in Adams County in 2015.

Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

According to the survey conducted as part of the Adams County Point-In-Time count, the majority of homeless persons (59%) were White, 27% were African American, and 6% were American Indian or Alaska Native. About one-quarter of homeless persons (of any race) were of Latino ethnicity.

In comparison to Adams County's total population, African Americans are overrepresented in the homeless population – they constitute only 3% of the overall population versus 27% of homeless persons. The American Indian and Alaska Native population is also overrepresented, making up 1% of Adams County population but 6% of its homeless population.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

According to the survey conducted as part of the Adams County Point-In-Time count, the majority of homeless persons were sheltered: 55% were in transitional housing, 24% were in an emergency shelter, and 3% were in a domestic violence shelter or safe haven housing. About one-fifth of homeless persons (18%) were unsheltered.

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NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)

Introduction:

This section will discuss the characteristics and needs of persons in various subpopulations of Commerce City who are not homeless but may require supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental) persons with HIV/AIDS and their families, persons with alcohol or drug addiction, victims of domestic violence, and persons with a criminal record and their families.

Describe the characteristics of special needs populations in your community:

According to the ACS 2014 5- year estimates, 6.2% of Commerce City's population is elderly, ages 65 to 74, while 2.2% is considered frail elderly, age 75 and over. A significant number of residents over the age of 65, (40.4%) have a disability. Within the City, 7.5% of residents had one or more disabilities, including:

- Hearing difficulty 5.9%
- Vision difficulty 6.1%
- Cognitive difficulty 6.2%
- Ambulatory difficulty 6.3%
- Self-care difficulty 6.3%
- Independent living difficulty 5.8%

According to Denver's Public Health Department, between 1982 and 2010, approximately 16,600 people in Colorado were diagnosed with HIV disease. In recent years, new diagnosis of HIV has remained stable, averaging about 430 new infections each year. According to estimates, 20 to 25% of individuals living with HIV in Colorado are unaware of their positive status. There are 11,000 people known to be living with HIV/AIDS in Colorado. Specifically, there are 6,653 HIV cases and 4,816 AIDS cases.

An annual survey sponsored by the U.S. Substance Abuse and Mental Health Services Administration (SAMHSA) provides the primary source of information on the use of illicit drugs and alcohol among non-institutionalized persons aged 12 years old or older.[1] In 2011, an estimated 20.6 million persons in the U.S. were classified with substance dependence or abuse in the past year (8.0 percent of the population aged 12 or older). Of these, 2.6 million were classified with dependence or abuse of both alcohol and illicit drugs, 3.9 million had dependence or abuse of illicit drugs but not alcohol, and 14.1 million had dependence or abuse of alcohol but not illicit drugs.

[1] Substance Abuse and Mental Health Services Administration, *Results from the 2011 National Survey on Drug Use and Health: Summary of National Findings*, NSDUH Series H-44, HHS Publication No. (SMA) 12-4713. Rockville, MD: Substance Abuse and Mental Health Services Administration, 2012.

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What are the housing and supportive service needs of these populations and how are these needs determined?

The primary housing and supportive needs of these subpopulations (the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS and their families, persons with alcohol or drug addiction, victims of domestic violence, and persons with a criminal record and their families) were determined by input from both service providers and the public through the survey, public meetings, and stakeholder interviews. These needs include affordable, safe housing opportunities in areas with access to transportation and paratransit, commercial and job centers, and social services including counseling, case management, and subsidies for childcare, and for education regarding fair housing rights and actions that can be taken in the event those rights are violated.

Persons with disabilities often require accessible features and ground floor housing units and use of supportive/therapeutic animals. Victims of domestic violence need safe housing, removal of barriers to relocation, and protection from perpetrators. Persons with criminal records and their families may be disqualified from public housing or Section 8 rental assistance, and accordingly, assistance with housing for low-income members of this subpopulation must be provided by other nongovernmental organizations. Interviews with stakeholders and residents indicated that residents with alcohol and substance abuse histories, as well as, victims of domestic violence may have criminal records.

Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The characteristics of the HIV/AIDS population within the Denver Metropolitan Statistical Areas include:

Prevalence Rates:

- Number of people living with diagnosed HIV in 2013: 8,812
- 90% of people living with diagnosed HIV in 2013 were men, and 10% were women.
- 15% of people living with diagnosed HIV in 2013 were black, 20% Hispanic/Latino, and 63% white.

New Diagnoses Rates:

- Number of new HIV diagnoses in 2014: 279
- 87% of people newly diagnosed with HIV between 2010 and 2014 were men, and 13% were women.
- 19% of people newly diagnosed with HIV between 2010 and 2014 were black, 28% Hispanic/Latino, and 50% white.

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

Describe the jurisdiction's need for Public Facilities:

Commerce City has established many well-received parks and recreation facilities in recent years, particularly including Pioneer Park and the Paradise Island Pool. The City's recreation center includes an indoor pool, exercise and fitness facilities, a senior center, and sports facilities. The facilities and programming were praised by residents and see frequent use. However, Commerce City's rapid population growth means that these community assets can quickly reach capacity and become crowded. A new Boys and Girls Club was constructed in Commerce City in 2015 and expanded the organization's capacity by about 30% from 150 to more than 200 children per day, however, due to the high demand for facilities of this type, the expanded Club is frequently at capacity and keeps a waiting list.

How were these needs determined?

In the Housing and Community Development Survey conducted in conjunction with this Consolidated Plan, the most highly rated public facility need, labeled a high priority by a majority (50.5%) of respondents, was the need for community parks, gyms, and recreation fields. This item was closely followed by youth, senior, or cultural centers, rated a high need by 45% of respondents. Public safety offices, healthcare facilities, and childcare centers were predominantly rated as medium-priority needs by survey respondents.

Describe the jurisdiction's need for Public Improvements:

Commerce City's unique geography and history has resulted in an older "Core City" from approximately 88th Avenue south that was constructed primarily in the 1940s and 1950s. Communities north of 96th Avenue make up what is known as the Northern Range and are much newer, many developed since the 2000s. Disparities exist between Core City and Northern Range communities in terms of the public infrastructure available. For example, sidewalks and street lighting are prevalent in the Northern Range and are required by the newer codes and development standards that were in place at the time those communities were built. But in the Core City, these amenities are frequently absent or old and in need of repair. Sidewalks, streetscape improvements, road paving, and aesthetic improvements in the Core City are among the greatest public improvement needs.

How were these needs determined?

Physical observations of Core City infrastructure corroborates survey results wherein the highest ranked need of any type was for street, road, and sidewalk improvements. Of the 210 respondents, 53.3% ranked this item a high priority need while another 36.6% ranked it a medium need. Nearly half of respondents (49.5%) rated the redevelopment of blighted properties as a high need. In a separate poll conducted as part of a Telephone Town Hall in April 2016, 53% of the 55 participants

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named the revitalization of blighted areas as the CDBG program area most likely to benefit Commerce City residents.

Describe the jurisdiction's need for Public Services:

The top public services needed in Commerce City include neighborhood cleanups, drug abuse education, crime prevention, youth services, and employment training. Neighborhood cleanups relate to aesthetic improvements in the Core City and were most often described as coordinated volunteer efforts engaging residents in the care and upkeep of their neighborhoods. The need for employment training is driven at least in part by the rapid increases in rent and housing prices in Commerce City. Because wages are not keeping pace with these housing cost increases, residents and stakeholders expressed a need for people to receive training or other assistance enabling them to access higher-paying jobs.

How were these needs determined?

Neighborhood cleanups, drug abuse education and crime prevention, and youth services were the three top ranked public service needs in the Housing and Community Development Survey. Employment training was ranked as the fourth most important public service need and also received support from participants in the Telephone Town Hall poll. Further support for the need for these services was derived from stakeholder interviews with nonprofit organizations and public agency staff as well as comments received from the public in meetings and focus groups.

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Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

While housing choices can be fundamentally limited by household income and purchasing power, the lack of affordable housing can be a significant hardship for low-income households preventing them from meeting their other basic needs. Stakeholders and residents reported housing affordability for low-income and moderate-income residents to be an issue throughout the City with all areas in high need of increased affordability housing opportunities. According to 2010-2014 ACS estimates, housing costs have increased for both owners and renters in the past ten years.

In interviews and meetings held in conjunction with this plan development process, residents frequently described a need for minor home repairs and rehabilitation and repairs to older housing stock located mainly in the older areas of the City. In a community survey conducted in conjunction with the planning process, 87.2% of respondents identified price of housing as a consideration in choosing where to live, while 73.8% identified the condition of housing as a consideration.

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MA-10 Number of Housing Units – 91.210(a)&(b)(2)

Introduction

This section explores the number and types of housing units in Commerce City and whether or not the number of available units is sufficient to meet housing demand for the City.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	11,435	72%
1-unit, attached structure	1,320	8%
2-4 units	733	5%
5-19 units	1,452	9%
20 or more units	390	2%
Mobile Home, boat, RV, van, etc	458	3%
Total	***15,788***	***100%***

Table 26 – Residential Properties by Unit Number

Data Source: 2008-2012 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	**%**	**Number**	**%**
No bedroom	45	0%	166	4%
1 bedroom	46	0%	688	17%
2 bedrooms	1,954	19%	1,529	38%
3 or more bedrooms	8,243	80%	1,623	41%
Total	***10,288***	***99%***	***4,006***	***100%***

Table 27 – Unit Size by Tenure

Data Source: 2008-2012 ACS

Describe the number and targeting of Units (income and type of family served) of units assisted with federal, state and local programs.

To be eligible for assistance under the CDBG program, households must have an annual income that does not exceed 80% of median income.

Provide an assessment of units expected to be lost from affordable housing inventory for any reason, such as expiration of Section 8 contracts.

The City does not anticipate losing any public housing units from the housing inventory during this Consolidated Plan period.

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Does the availability of housing units meet the needs of the population?

While the City has a housing supply exceeding 15,000 units, there is a significant disconnect between the supply of the housing units and the demand, location, price, and quality of the housing units. Based on Commerce City's average household size of 3.15 people, the City's 53,696 residents would require approximately 17,046 housing units, however, as of the Census's last count (2010-2014 ACS Estimates), the figure was 15,626, a shortfall of over 1,400 units or 9.0%. The shortage of available units was borne out in comments from Commerce City residents in public meetings and other settings. Many of the housing units, especially the lower priced units, are reported by residents and stakeholders to be older housing stock or to be of poor or substandard quality, and some properties have absentee owners and landlords. Residents frequently cited concern about rapidly increasing housing costs, reporting anecdotal examples of rents increasing 50% from one year to the next. Subsidized housing, especially apartments for seniors, seldom have vacancies and waiting lists for public housing and Housing Choice Vouchers in Commerce City are closed.

Describe the need for specific types of housing

Large related households, which are defined as households consisting of 5 or more persons, have a greater percentage of housing need than any other household type. In order to achieve affordability, extended families may reside together. The high price and limited supply of larger housing units force many families to either live in overcrowded, smaller units or overpriced, larger homes. Additionally, senior and disabled housing is needed in Commerce City as the aging of the population creates an increasing need for housing that is accessible for occupants as well as visitors.

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MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

Introduction

This section describes housing cost and affordability in Commerce City The median home value in Commerce City has increased by 72% between 2000 and 2012 and rent has increased by 39% in the same time period. Increases in both ownership and rental cost, have made housing affordability a critical issue for the City.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2012	% Change
Median Home Value	109,600	188,400	72%
Median Contract Rent	535	743	39%

Table 28 – Cost of Housing

Data Source: 2000 Census (Base Year), 2008-2012 ACS (Most Recent Year)

Rent Paid	Number	%
Less than $500	732	18.3%
$500-999	2,283	57.0%
$1,000-1,499	803	20.1%
$1,500-1,999	188	4.7%
$2,000 or more	0	0.0%
Total	***4,006***	***100.0%***

Table 29 - Rent Paid

Data Source: 2008-2012 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	540	No Data
50% HAMFI	1,210	445
80% HAMFI	2,185	958
100% HAMFI	No Data	1,162
Total	***3,935***	***2,565***

Table 30 – Housing Affordability

Data Source: 2008-2012 CHAS

Is there sufficient housing for households at all income levels?

Housing affordability is reported as a key issue in Commerce City. While there are relatively affordable units with lower rents that are available to low-income residents, some of these units are visibly substandard and have absentee landlords. Affordable housing for seniors and disabled residents, who are more likely to have fixed incomes, was also identified as a key need by residents and stakeholders.

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How is the affordability of housing expected to change considering changes to home values and/or rents?

Many variables influence the demand for affordable housing units such as emerging demographic trends, the incidence of overcrowding, and housing costs. The high rate of population growth in Commerce City, coupled with the needs of the aging and disabled population that is likely to be on a fixed-income, translates into continued strong demand for new affordable housing units. The City has had significant increases in housing costs in both the ownership and rental markets over the past decade, making affordability a key issue for the City going forward.

How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

A small, but significant percentage of rental housing in Commerce City (18.3%) rents at rates of less than $500 per month. However, more than 1 in 4 units, (24.8% of the City's rental housing stock) carry rents of $1,000 or more per month. Not accounted for in the data here is housing condition, which is an important consideration. While the rent may be affordable, substandard housing conditions in those affordable units may make them unsafe or may lead to exceptionally high utility costs, negating any savings in rent as compared to a more expensive unit elsewhere. Additionally, median rents increased by nearly 40% between 2000 and 2012, indicating an acute decline in housing affordability in Commerce City, and making planning for affordable housing a key issue for the City's future planning and development.

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MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

Introduction

This section examines the condition of housing in Commerce City including the presence of 1 of 4 housing conditions: 1) lacks complete plumbing facilities, (2) lacks complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%. This section also examines the age of housing stock and the risk of lead based paint. According to 2008-2012 ACS estimates, 34%, more than 1 in 3, of owner occupied units and 51%, or over half, of renter occupied units have at least one housing condition.

Definitions

Commerce City's definition of "standard condition" is a unit that meets all applicable state and local codes. Structures in substandard, or "unsafe" condition, are those that are or become "unsafe, uninhabitable, or which constitute a fire hazard, or are otherwise dangerous to human life or the public welfare." If declared unsafe by a building official, the structure must be demolished or rehabilitated

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	3,528	34%	2,046	51%
With two selected Conditions	138	1%	228	6%
With three selected Conditions	0	0%	34	1%
With four selected Conditions	0	0%	0	0%
No selected Conditions	6,622	64%	1,698	42%
Total	***10,288***	***99%***	***4,006***	***100%***

Table 31 - Condition of Units

Data Source: 2008-2012 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	6,485	63%	1,168	29%
1980-1999	768	7%	564	14%
1950-1979	2,548	25%	1,890	47%
Before 1950	487	5%	384	10%
Total	***10,288***	***100%***	***4,006***	***100%***

Table 32 – Year Unit Built

Data Source: 2008-2012 CHAS

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Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	3,035	30%	2,274	57%
Housing Units build before 1980 with children present	2,639	26%	790	20%

Table 33 – Risk of Lead-Based Paint

Data Source: 2008-2012 ACS (Total Units) 2008-2012 CHAS (Units with Children present)

Need for Owner and Rental Rehabilitation

The age of the housing stock in Commerce City has a significant impact on the housing conditions in the area. Much of the housing stock in the City has aged significantly, as evidenced by approximately one-quarter (25%) of owner-occupied housing units and nearly half (47%) of rental housing units built between 1950 and 1979. As housing ages, maintenance costs increase which can present significant costs for low and moderate- income homeowners. In addition, older units often need rehabilitation to bring housing up to current code, reduce lead-based paint hazards, and meet current ADA requirements.

Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards

Exposure to lead-based paint represents one of the most significant environmental threats from a housing perspective. Housing conditions can significantly affect public health. HUD regulations regarding lead-based paint apply to all federally assisted housing. The major source of lead exposure comes from lead-contaminated dust found in deteriorating buildings. Many residential properties built before 1978 contain lead-based paint. Unfortunately, measuring the exact number of housing units with lead-based paint hazards is difficult. Lead is a highly toxic metal that may cause a range of health problems for adults and children.

Low-income households that earn between 0 and 50% of Median Family Income (MFI) are least able to afford well-maintained housing and, therefore, are often at greater risk of lead poisoning. Using 2008-2012 ACS data for the distribution of housing units by age and tenure in Commerce City, 30% of owner-occupied households and 57% of renter households may be at risk of lead hazards in their homes.

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MA-25 Public and Assisted Housing – 91.210(b)

Introduction

This section provides a summary of the public and assisted housing available throughout Commerce City and Adams County. While the HUD-required portion of this section focuses on Public Housing and Housing Choice Vouchers and sources its data from the Adams County Housing Authority (ACHA), other types of subsidized or assisted housing, particularly Low-Income Housing Tax Credit (LIHTC) units, are important components of the City's affordable housing stock as well. The following tables will summarize information only on the ACHA's public housing units and Housing Choice Vouchers.

Totals Number of Units

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available			42	1,435			0	124	0
# of accessible units									
***includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**									

Table 34 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

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Describe the supply of public housing developments:

The current supply of public housing units in Commerce City is insufficient to meet local needs. Waiting lists for public housing units and housing choice vouchers are lengthy and are closed to new applicants. The occupancy rate for existing units is virtually 100%. Because HUD has not recently provided funding for new public housing units or for additional vouchers, ACHA and CCHA have not been able to use these traditional sources to expand the supply of assisted housing.

HUD's LIHTC Database lists 495 tax credit-funded units in Commerce City, at least 492 of them restricted to low-income households. Though the LIHTC Database is current only through 2014, it shows no new LIHTC units placed in service in Commerce City since 2009.

Low-Income Housing Tax Credit (LIHTC) Inventory				
Project Name	Project Address	Total Number of Units	Total Low-Income Units	Placed-In-Service Year
Kearney Street	6598 Kearney St.	2	2	1992
Mercy Holly Park West	5520 E. 60th Ave.	96	96	1999
Village Crest Apts	6201 E. 62nd Ave.	120	120	2000
Conter Estates Senior Apts I	6600 E. 60th Pl.	75	74	2003
Kearney Plaza Apts Ahpc	6140 E. 63rd Pl.	51	50	2003
Pinecrest At Commerce City	5655 Olive St.	112	111	2006
Conter Estates Senior Apts II	6600 E. 60th Pl.	39	39	2009

Source: LIHTC Database, http://lihtc.huduser.gov/

Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The ACHA owns 42 units of public housing at a single site in unincorporated Adams County. This property, known as Casa Redonda de Vigil, is designated as senior housing. According to the last available physical inspection score for the property, dated February 2007, these public housing units were in good condition. The site, building systems, and common areas all received a maximum score of 100. The property's average inspection score across all categories was 93.29. CCHA has an ownership interest in 226 affordable housing units throughout Commerce City; however, none of these units are covered by a HUD Public Housing Agency Plan. While objective

inspection scores are not available through HUD, the condition of affordable housing units owned by CCHA is generally observed to be good.

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Public Housing Condition

Public Housing Development	Average Inspection Score
Casa Redonda de Vigil Apartments	93.29

Table 35 - Public Housing Condition

Describe the restoration and revitalization needs of public housing units in the jurisdiction:

CCHA's 2011 Strategic Plan contains an Agency goal related to preserving and enhancing existing subsidized housing units in Commerce City. Based on the plan, the primary needs for restoration and revitalization of this segment of the City's housing stock are to:

- Protect and improve the affordable housing developments that currently exist within Commerce City, so that all are an asset to the community.
- Increase the quality, value, marketability, and energy efficiency of all CCHA properties.
- Continue to focus on both curb appeal and interior upkeep of all CCHA developments.
- Achieve maximum utilization of the Section 8 program.

Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:

According to the CCHA's Strategic Plan, "History shows that education and employment are the surest ways to break the cycle of generational poverty. Low-income residents must gain basic skills to enter the job market and continue upgrading their abilities to higher wage levels." CCHA outlines a four-point plan for accomplishing the goal of breaking generational poverty and thus improving the living environment of its tenants.

1. Collaborate with partners to educate residents about home ownership and mortgage programs and practices.
2. Examine opportunities for CCHA to support existing residents to develop important skills and resources.
3. Meet with, and reach out to, residents and resident leaders to better understand and respond to needs and goals.
4. Support programs that encourage all residents to become active and involved within their community, including self-awareness of their surroundings and crime prevention.

The ACHA describes itself as a "Two Generation" housing authority that supports twin goals of stabilizing parents and providing education and other support for children through nonprofit partners. The ACHA invests over $600,000 per year on a "peer navigator" program designed to offer in-home parenting classes and financial coaching that may give families living in poverty a chance at upward mobility.

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MA-30 Homeless Facilities and Services – 91.210(c)

Introduction

Two organizations operating in Commerce City provide facilities and/or housing targeted to the homeless – Access Housing and Our Lady Mother of the Church. Access Housing has a well-established program that includes rental assistance, homelessness prevention, rapid rehousing, emergency housing for families, and transitional housing rental units. While it does not run a year round shelter, Our Lady Mother of the Church offers affordable housing to up to four individuals at a time through the use of its convent. Commerce City residents may receive homeless housing or services from agencies outside of the city, but the table below summarizes the number of beds and units that are available only within Commerce City.

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	8	0	27	0	0
Households with Only Adults	0	0	4	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

Table 36 - Facilities and Housing Targeted to Homeless Households

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Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons

Access Housing in Commerce City offers a variety of services to connect homeless persons with mainstream services such as health, mental health, and employment services. Its STEPS Success Self-sufficiency Program assists adults secure and maintain living wage jobs and also provides GED preparation and life skills training. Families staying in Access Housing's shelter receive case management services, transportation assistance, and resource information about and referrals to other community partners for additional services, including healthcare and mental healthcare. The Home Again Family Support Program provides eligible families with financial assistance for medical, education, and transportation expenses. Access Housing recently made arrangements for its clients to receive mental health and life counseling on-site.

Anythink Library also provides technology and job application assistance for community members, including persons who are homeless or at risk of homelessness.

List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.

Commerce City residents who are homeless or at risk of homelessness may receive assistance from the following organizations working in Commerce City and/or Adams County:

- Access Housing in Commerce City – Provides an emergency family shelter, affordable rental housing, a support program as families transition from homelessness to permanent housing, a self-sufficiency program to encourage employment and job skills training, utility assistance, and other resources such as food, clothing, furnishings, and transportation assistance.
- Our Lady Mother of the Church in Commerce City – Provides transitional affordable housing for up to four low income individuals.
- Almost Home in Brighton – Operates Hughes Station, which offers subsidized apartment units for families transitioning out of homeless shelters.
- Growing Home in Westminster – Offers four transformation family housing units and 16 permanent affordable housing units.
- Alternatives to Family Violence – Offers emergency shelter, counseling and case management, and other services to victims of domestic violence.

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MA-35 Special Needs Facilities and Services – 91.210(d)

Introduction

This section describes the housing and social service needs of Commerce City's special populations including the elderly, frail elderly, domestic violence victims, residents with diagnosis of HIV/AIDS, and residents with substance abuse, mental health, or disability diagnosis.

Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs

The primary housing and supportive service needs of Commerce City's special needs subpopulations (the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS and their families, persons with alcohol or drug addiction, victims of domestic violence, and persons with a criminal record and their families) include affordable, safe housing opportunities in areas with access to transportation, commercial and job centers, social services and supportive services including counseling, case management, support for activities of daily life, and for education regarding fair housing rights and actions that can be taken in the event those rights are violated.

Persons with disabilities often require accessible features and ground floor housing units and supportive animals. Available housing for this subpopulation is limited within Commerce City, according to stakeholder reports, thus limiting housing choice. Victims of domestic violence need safe housing, removal of barriers for relocation, and protection from perpetrators. Persons with criminal records and their families, including residents with alcohol and substance abuse issues and victims of domestic violence, may be disqualified from public housing or Section 8 rental assistance, and accordingly, assistance with housing for low-income members of this subpopulation must be provided by other nongovernmental organizations.

Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

Information gathered through community meetings and stakeholder interviews indicates that supportive housing is a need for people with mental health and substance abuse disorders after being discharged from inpatient treatment in order to prevent homelessness. Housing referrals are often made to several area nonprofits that work together to provide temporary food, clothing, and other immediate services.

Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with

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respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)

Commerce City will make it a priority to increase the supply of affordable housing with supportive services by participating in coordination efforts among organizations in the nonprofit sector to ensure housing and services are provided in an efficient and streamlined manner. The City also plans to invest CDBG funds over the five years covered by this plan in homeowner repair and rehabilitation activities, which may enable special needs populations to age in place or otherwise remain in their own homes.

Many of the supportive services for the special needs subpopulations are available through existing nongovernmental organizations. However, there is a strong need for greater collaboration and education in order to link persons with special needs to the network of services available more efficiently and comprehensively and reduce service duplication. The City will strengthen collaboration among the network of service providers by: facilitating the development of social service collaborations across the region to coordinate the work of social service organizations, disseminate news and information, and spearhead community-wide solutions to local needs.

For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))

Commerce City will make it a priority to increase the supply of affordable housing with supportive services by participating in coordination efforts among organizations in the nonprofit sector to ensure housing and services are provided in an efficient and streamlined manner. The City also plans to invest CDBG funds over the five years covered by this plan in homeowner repair and rehabilitation activities, which may enable special needs populations to age in place or otherwise remain in their own homes.

Many of the supportive services for the special needs subpopulations are available through existing nongovernmental organizations. However, there is a strong need for greater collaboration and education in order to link persons with special needs to the network of services available more efficiently and comprehensively and reduce service duplication. The City will strengthen collaboration among the network of service providers by: facilitating the development of social service collaborations across the region to coordinate the work of social service organizations, disseminate news and information, and spearhead community-wide solutions to local needs.

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MA-40 Barriers to Affordable Housing – 91.210(e)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

Affordable Housing is one of Commerce City's three strategic housing-related goals appearing in the City's C3 Vision Plan. In addition to promoting a mix of housing types and price ranges the plan specifically calls for "housing that is affordable, not only to buy or rent but also that is cost-efficient and healthy to live in, is important to enable more residents to live near where they work to allow them to become economically self-sufficient." The plan prioritizes affordable housing that is accessible to transit.

Housing affordability is a key issue affecting the entire Denver area, including Commerce City, and is driven primarily by supply and demand. Between 2014 and 2015, Denver's population grew by 2.7%, making it the fastest-growing of America's 50 largest cities.[2] During the same 2014-2015 span, Census data shows that Commerce City's population grew by 3.6% from 51,831 to 53,696. Despite this strong population growth, addition of new housing units has not kept pace, resulting in a relative scarcity of housing which has, in turn, driven up prices.

Based on Commerce City's average household size of 3.15 people, the city's 53,696 residents would require approximately 17,046 housing units, however, as of the Census's last count (2010-2014 ACS Estimates), the figure was 15,626, a shortfall of over 1,400 units or 9.0%. The shortage of available units was borne out in comments from Commerce City residents in public meetings and other settings. Residents frequently cited concern about rapidly increasing housing costs, reporting anecdotal examples of rents increasing 50% from one year to the next. Subsidized housing, especially apartments for seniors, seldom have vacancies and waiting lists for public housing and Housing Choice Vouchers in Commerce City are closed.

Adams County's 2015 Analysis of Impediments to Fair Housing Choice included a review of public policies and the effects of those policies on housing availability. That analysis concluded that neither local building codes, nor planning, permitting, or development review processes posed significant barriers to housing development in the County or in its cities. However, development-related costs (land costs, labor, materials, tap fees, impact fees, and the costs of assuaging NIMBY sentiments particularly directed at multifamily housing) were determined to have a significant negative effect on development of new housing.

Stakeholders interviewed in the course of preparing this plan also cited Colorado's construction defect laws as contributing to the lack of affordable multifamily housing supply. The well-intentioned state laws were designed to protect homebuyers from defective housing construction, but in allowing class action lawsuits from as few as two homeowners against a builder or other construction industry professional, the industry has all but stopped producing multifamily housing

[2] "Denver tops U.S. city population gain rate in 2015". The Denver Post, May 19, 2016. http://www.denverpost.com/2016/05/19/chart-denver-tops-u-s-city-population-gain-rate-in-2015/

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due to the high risk of litigation and the associated costs of insurance against such legal claims. Where multifamily housing is being constructed, it typically must exceed a $400,000 per unit price point in order to cover the builder's insurance costs.

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MA-45 Non-Housing Community Development Assets – 91.215 (f

Introduction

This section examines the community assets aside from housing in Commerce City including: business activity, the workforce, economic activities, and educational attainment.

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	438	386	2	2	-1
Arts, Entertainment, Accommodations	2,185	1,134	11	4	-7
Construction	1,745	3,350	9	13	4
Education and Health Care Services	2,260	826	12	3	-9
Finance, Insurance, and Real Estate	1,209	890	6	3	-3
Information	509	30	3	0	-3
Manufacturing	1,731	2,810	9	11	2
Other Services	615	1,004	3	4	1
Professional, Scientific, Management Services	1,681	655	9	3	-6
Public Administration	0	0	0	0	0
Retail Trade	2,251	1,661	12	6	-5
Transportation and Warehousing	1,408	8,103	7	32	24
Wholesale Trade	1,568	3,027	8	12	4
Total	17,600	23,876	--	--	--

Table 37 - Business Activity

Data Source: 2008-2012 ACS (Workers), 2011 Longitudinal Employer-Household Dynamics (Jobs)

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Labor Force

Total Population in the Civilian Labor Force	23,427
Civilian Employed Population 16 years and over	21,233
Unemployment Rate	9.37
Unemployment Rate for Ages 16-24	33.32
Unemployment Rate for Ages 25-65	5.83

Table 38 - Labor Force

Data Source: 2008-2012 ACS

Occupations by Sector	Number of People
Management, business and financial	3,741
Farming, fisheries and forestry occupations	908
Service	2,146
Sales and office	5,091
Construction, extraction, maintenance and repair	3,197
Production, transportation and material moving	1,945

Table 39 – Occupations by Sector

Data Source: 2008-2012 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	10,032	50%
30-59 Minutes	8,613	43%
60 or More Minutes	1,606	8%
Total	***20,251***	***100%***

Table 40 - Travel Time

Data Source: 2008-2012 ACS

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	3,478	422	1,366
High school graduate (includes equivalency)	4,407	505	1,393
Some college or Associate's degree	5,778	352	1,168
Bachelor's degree or higher	4,543	132	648

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Table 41 - Educational Attainment by Employment Status

Data Source: 2008-2012 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	**25–34 yrs**	**35–44 yrs**	**45–65 yrs**	**65+ yrs**
Less than 9th grade	214	658	884	1,029	671
9th to 12th grade, no diploma	936	1,058	559	1,078	482
High school graduate, GED, or alternative	1,174	1,946	1,775	2,584	1,002
Some college, no degree	960	2,151	1,496	1,378	568
Associate's degree	142	1,084	258	948	76
Bachelor's degree	152	1,592	1,223	1,067	64
Graduate or professional degree	30	412	599	430	78

Table 42 - Educational Attainment by Age

Data Source: 2008-2012 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	22,315
High school graduate (includes equivalency)	32,349
Some college or Associate's degree	41,152
Bachelor's degree	53,949
Graduate or professional degree	55,933

Table 43 – Median Earnings in the Past 12 Months

Data Source: 2008-2012 ACS

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

As depicted in the Business Activity chart above, Commerce City's largest employment sectors are: educational services, and health care and social assistance (12%), retail trade (12%), arts, entertainment, accommodations and food (11%), and construction, manufacturing, and professional, scientific and management services each with (9%) respectively.

Describe the workforce and infrastructure needs of the business community:

With more than one-fifth of the City's workforce employed in either the education, health care, and social services sector or the professional, scientific, management services sector, the local economy will depend on a strong pool of labor skilled in these particular industries. Most

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occupations within the sectors require educational attainment beyond the high school diploma. Based on the lower income levels associated with non-completion of a high-school diploma, the City should invest in job training and employment services and seek to increase community college attendance among residents.

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.

The city's unemployment rate has been gradually declining from its peak in 2010, however, unemployment in the area has exceeded that of the surrounding metropolitan area. City residents will need skills in business development and management and job training in various service industries including health care, education, arts, entertainment, tourism, and food services.

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

Commerce City has job training programs and an economic development team that works with local colleges and employers to train and hire City residents. Continued collaboration between Commerce City's institutions of higher learning are needed to promote curricula and coursework focused on the local labor market needs. Programs promoting entrepreneurship are needed.

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

Local colleges provide individuals with career development resources in order to produce a skilled workforce for businesses. Currently, community colleges and training programs offer various assessments, workshops and services to equip job seekers with the necessary skills to achieve self-sufficient employment. This work can support the Consolidated Plan by increasing job readiness and job opportunities in priority low-come and high poverty neighborhoods, encouraging microenterprise, and offering job skills and work programs to youth.

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

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

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attract new employers, strengthen existing companies, encourage entrepreneurship, foster community collaboration, and make the region more competitive for industries.

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.

This City's strategic economic action plan focuses on four core strategy areas:

- Carry out a targeted marketing and business development program
- Expand support to existing businesses and entrepreneurs
- Help put appropriate real estate options and infrastructure in place
- Elevate educational and technical training skills

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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 four types of housing problems: (1) cost burden – households spending more than 30% of income on housing; (2) overcrowding – more than one person per room; (3) lack of complete kitchen facilities; and (4) lack of complete plumbing facilities. The map on the following page shows the share of households within each census tract that have one or more housing needs. Areas with the highest concentrations of housing problems (defined as more than 40% of households) are shown on the map that follows and include:

- Census tracts 89.01 and 87.09, located adjacent to one another in southern Commerce City along the border with Denver. This area is roughly bounded by East 64th Avenue, Vasquez Boulevard, East 70th Avenue, and the city limits. Just over half (51%) of households in both tracts have one or more housing needs; and

- Census tracts 88.01 and 88.02 in the Irondale and Derby areas connecting north and south Commerce City. This area is roughly bounded by the East 72nd Avenue on the south, East 96th Avenue on the north, and the city limits on the east and west. Fifty-seven percent (57%) of households in tract 88.01 have one or more needs, as do 65% of households in tract 88.02.

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

Geographic patterns for Commerce City's racial and ethnic minority populations are shown in the map included in this section. Areas with the highest concentrations of minority residents (defined as more than 50% of the census tract) include all census tracts south of East 96th Avenue, with the exception of the tract that surrounds the Civic Center and has no population. The majority of the city's minority residents are Latino (85%, or 22,218 of Commerce City's 26,080 minority residents).

Low and moderate income households (those earning 80% or less of Area Median Income) are also concentrated in south Commerce City, as shown on the map in this section. Again, all tracts south of East 96th Avenue have concentration of low and moderate income households (i.e., 51% or more of households have incomes below 80% AMI).

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

Housing market characteristics (based on the 2010-2014 American Community Survey) for the six Commerce City census tracts south of East 96th Avenue (87.05, 87.09, 88.01, 88.02, 89.01, and 89.06) are summarized below:

- There are a total of 9,563 housing units in the six tracts with concentrations of minority population and low/moderate incomes. The vacancy rate is comparable to that of the citywide rate (8% and 7%, respectively).
- Just over half (55%) of households in these census tracts are owners and 45% are renters. In comparison, homeowners make up 72% of households citywide and renters make up 28%.
- Housing in these six tracts tends to be older than housing throughout Commerce City. Eleven percent (11%) of units were built since 2000, compared to 53% of units in the city. Homes built before 1980 make up 77% of the housing stock in these areas versus 38% of housing citywide. Stakeholder input revealed a need for single-family home repair or rehabilitation in south Commerce City, including for senior homeowners.
- Single-family homes make up 68% of housing in the census tracts with concentrations of minority population and low/moderate income families, below the citywide share of 75%. Units in small multifamily structures (5 to 19 units) constitute 9% and larger multifamily housing (20 or more units) comprises 6%. Small multifamily units make up a similar share of housing in Commerce City (8%), although large multifamily properties make up a smaller share (2%) citywide.
- Thirty-three percent (33%) of renter households in census tracts with concentrations of minority population and low/moderate income families have contract rents between $500 and $749. Another third of renters (31%) spend between $750 and $999 on rent each month. Relatively smaller share spend under $500 (16%) or over $1,000 (18%). In contrast, 31% of renters throughout Commerce City spend more than $1,000 per month.
- Most owners with a mortgage living in these census tracts spend between $1,000 and $1,499 a month on housing (44%). About one-third (31%) spend less than $1,000, and one-quarter (25%) spend over $1,500. In contrast, the majority of owners in Commerce City (63%) spend more than $1,500 a month on housing; only 11% spend under $1,000.

Are there any community assets in these areas/neighborhoods?

There are significant community assets in south Commerce City. This area is home to the city's largest concentration of employment, specifically along the I-270 corridor towards the southernmost city limit. East 96th Avenue and the areas to its north and south also contain a

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significant share of Commerce City jobs. In addition to the industrial jobs along the interstate and in Irondale, south Commerce City also contains the recently-developed Civic Center and Dick's Sporting Goods Park. Other significant civic uses include Adams City High School, Pioneer Park and Paradice Island, the Commerce City Recreation Center, Anythink Library, and the Suncor Boys and Girls Club. The Derby commercial district, which includes several small business, is also located within these census tracts.

Are there other strategic opportunities in any of these areas?

South Commerce City has several strategic opportunities for large scale development and redevelopment, including:

- The area surrounding the Civic Center and Dick's Sporting Goods Park, which has the potential to develop as a commercial or mixed-use center;
- The former Mile High Greyhound Park, which has been demolished and is anticipated to redevelop with a mix of uses including commercial and residential space. While development plans have not yet been completed for the former race track, the site is in the process of being designated as an Urban Renewal Area; and
- The East 72nd Avenue Station Area, which is anticipated to open as a stop on RTD's light rail line in 2018. In 2013, a master plan was completed for the station area and adjacent neighborhood with the goal of developing a vision for the area's future and identifying ways to revitalize underutilized or vacant parcels as part of a transit-oriented development.

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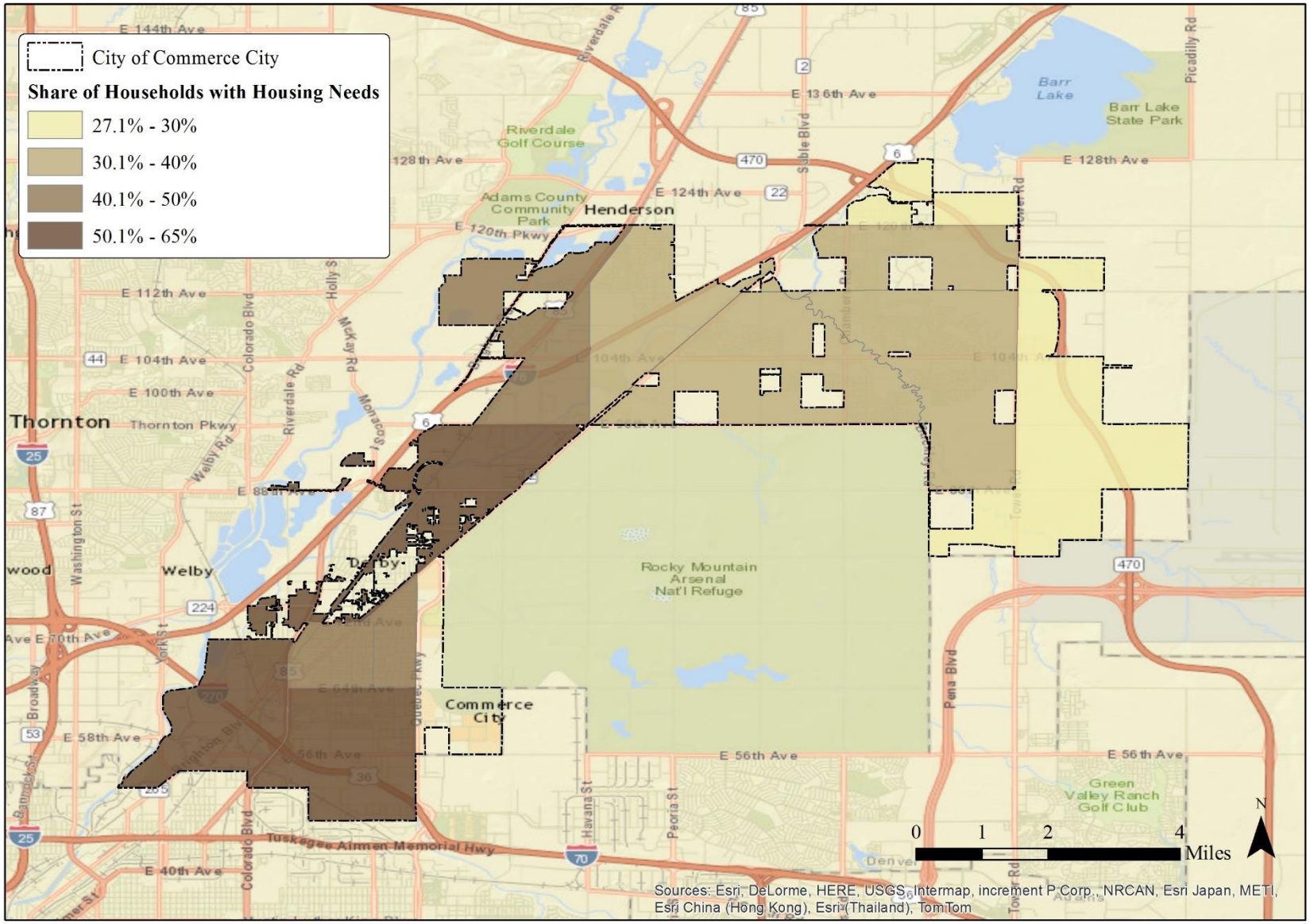
Share of Households with One or More Housing Needs by Census Tract in the City of Commerce City



Source: HUD CPD Maps, https://egis.hud.gov/cpdmaps/

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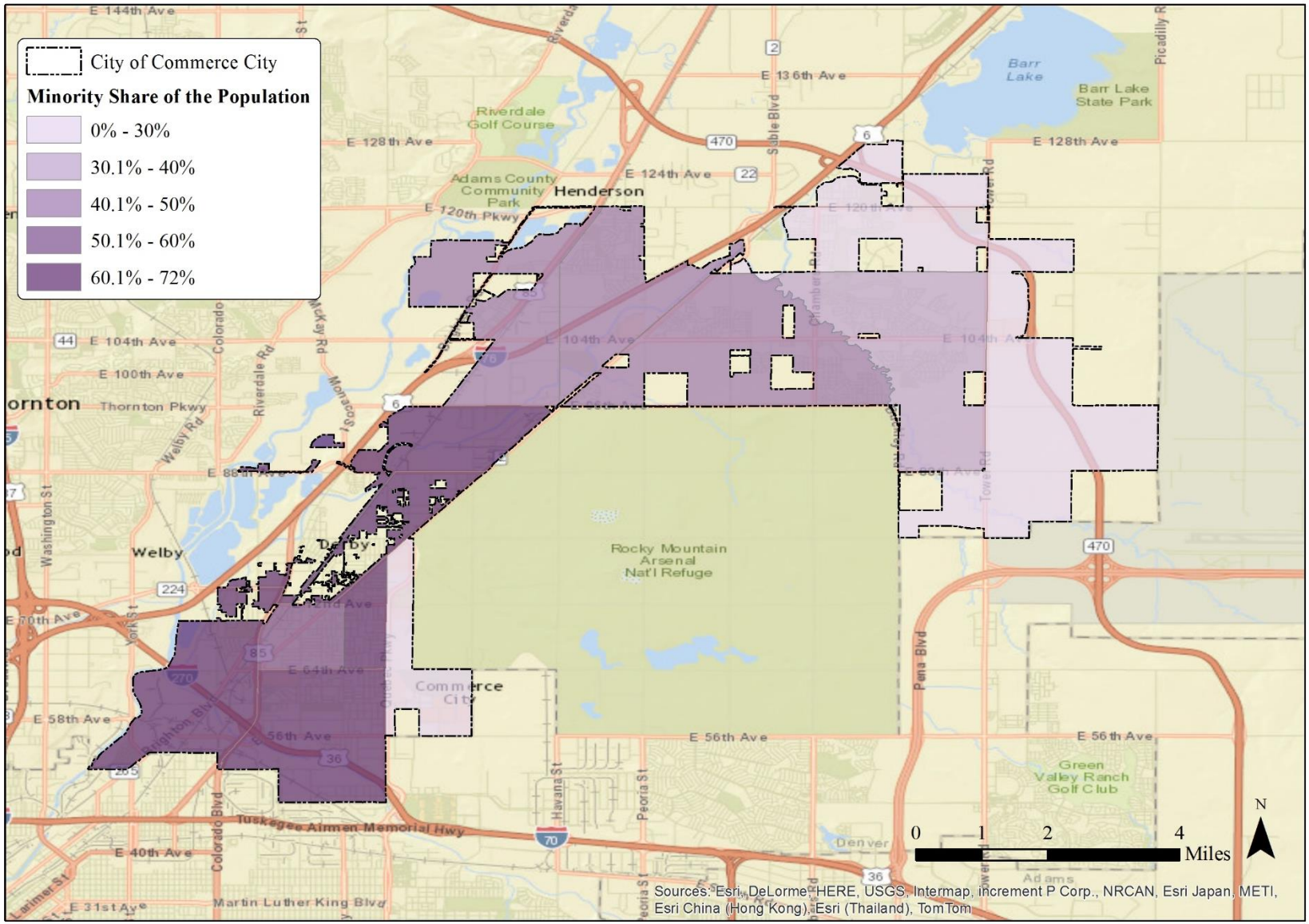
Minority Share of the Population by Census Tract in the City of Commerce City



Source: 2010-2014 5-Year American Community Survey Table B03002

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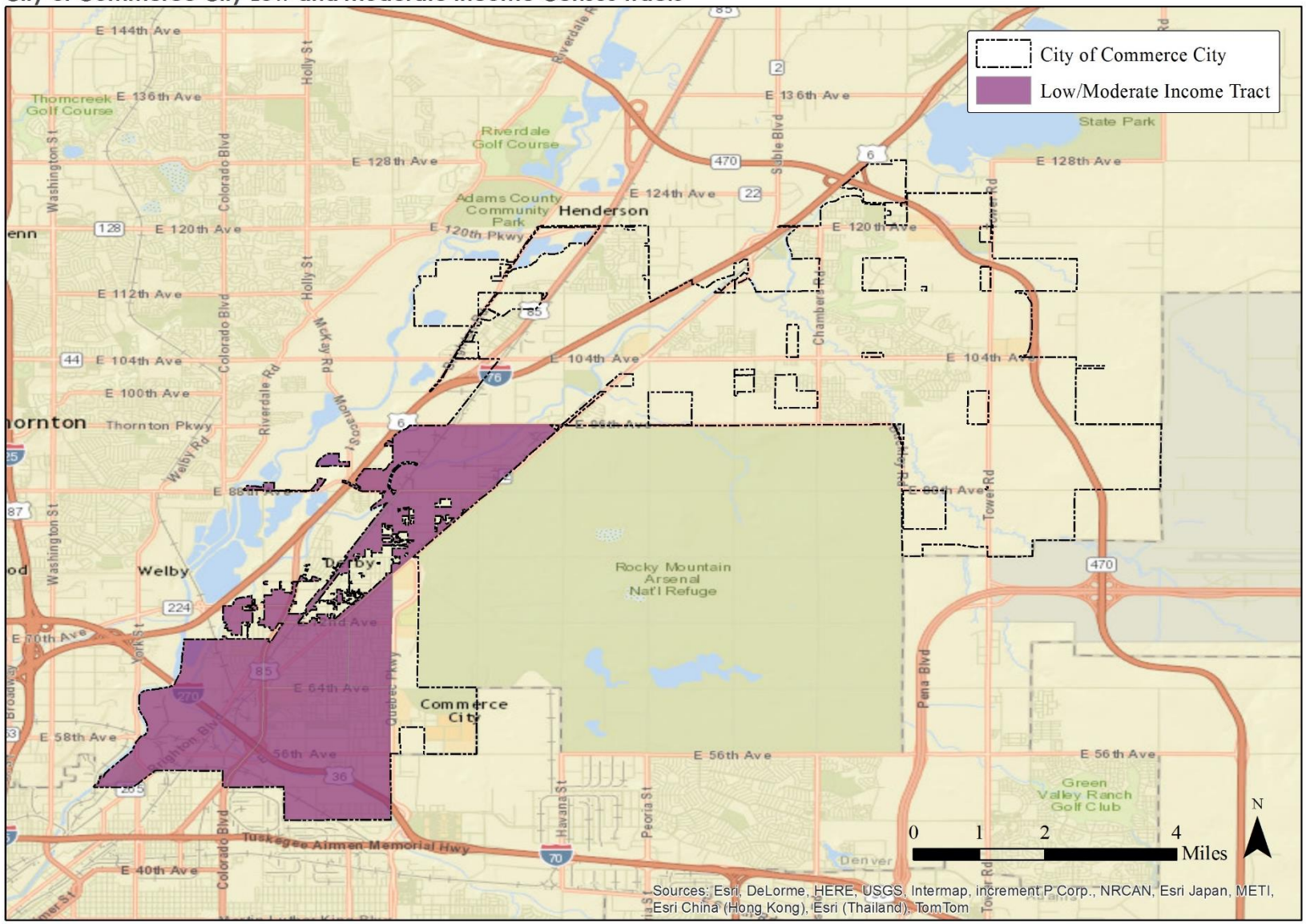
City of Commerce City Low and Moderate Income Census Tracts



Source: FY 2015 Low and Moderate Income Summary Data from https://www.hudexchange.info/manage-a-program/acs-low-mod-summary-data-block-groups-places/

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Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan outlined in the following sections addresses market conditions, the resources expected to be available to meet community needs, the structure in place for delivering services, goals, barriers to meeting the goals, and how those barriers may be overcome. The Strategic Plan also includes a discussion of public housing, homelessness and lead-based paint and describes Commerce City's anti-poverty initiatives and plans to monitor performance and compliance.

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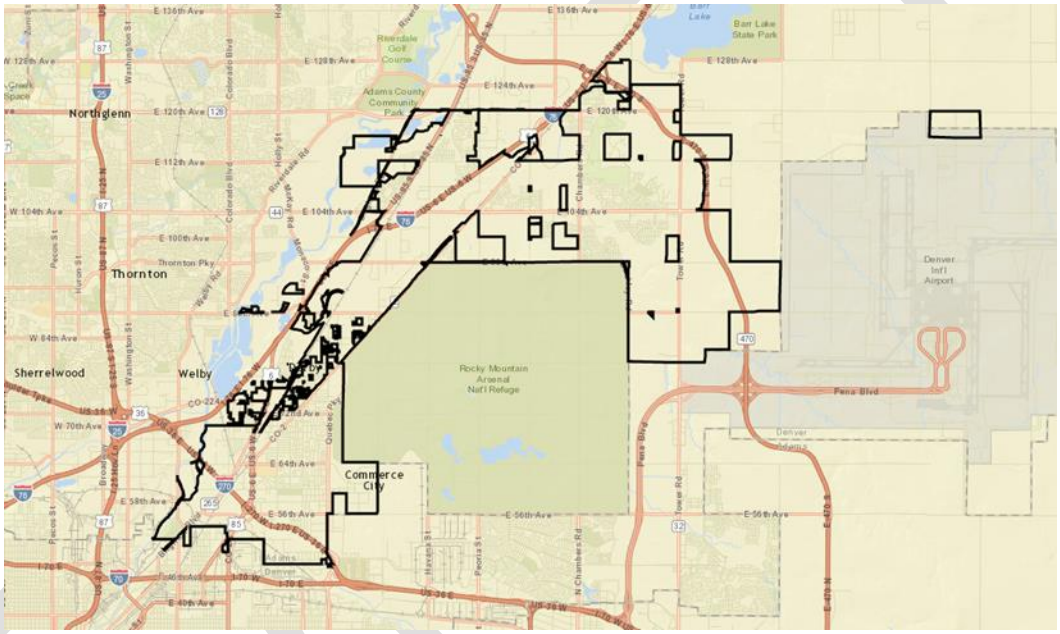
SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

The City of Commerce City is an entitlement community located in 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 bound on its west generally by the South Platte River. Brighton, the Adams County seat, is to the City's north and the municipalities of Aurora and Thornton are also adjacent. Commerce City's thriving industrial economy depends on Commerce City's rich transportation connectivity: I-76, I-270, and E-470 all traverse the City in addition to three different railroads. The City's area is approximately 41 square miles.

Commerce City, Colorado – General Map



Source: HUD CPD Maps, http://egis.hud.gov/cpdmaps/

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

The following two maps depict the low- and moderate-income census tracts within Commerce City. The areas shaded on the maps will generally be prioritized for allocation of CDBG resources, however, individual low- and moderate-income persons residing anywhere in the City may be eligible beneficiaries of CDBG funds.

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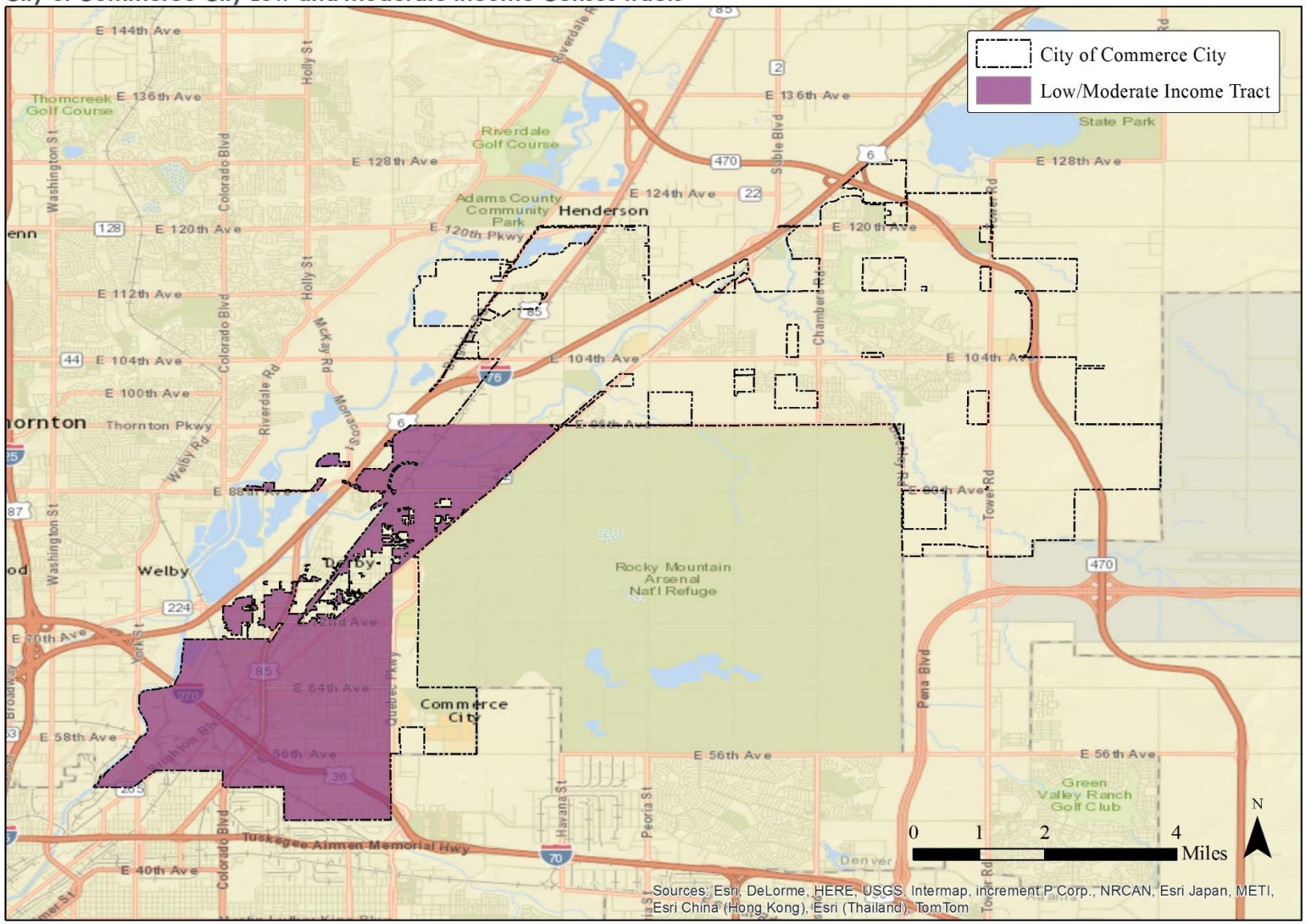
City of Commerce City Low and Moderate Income Census Tracts



Source: FY 2015 Low and Moderate Income Summary Data from https://www.hudexchange.info/manage-a-program/acs-low-mod-summary-data-block-groups-places/

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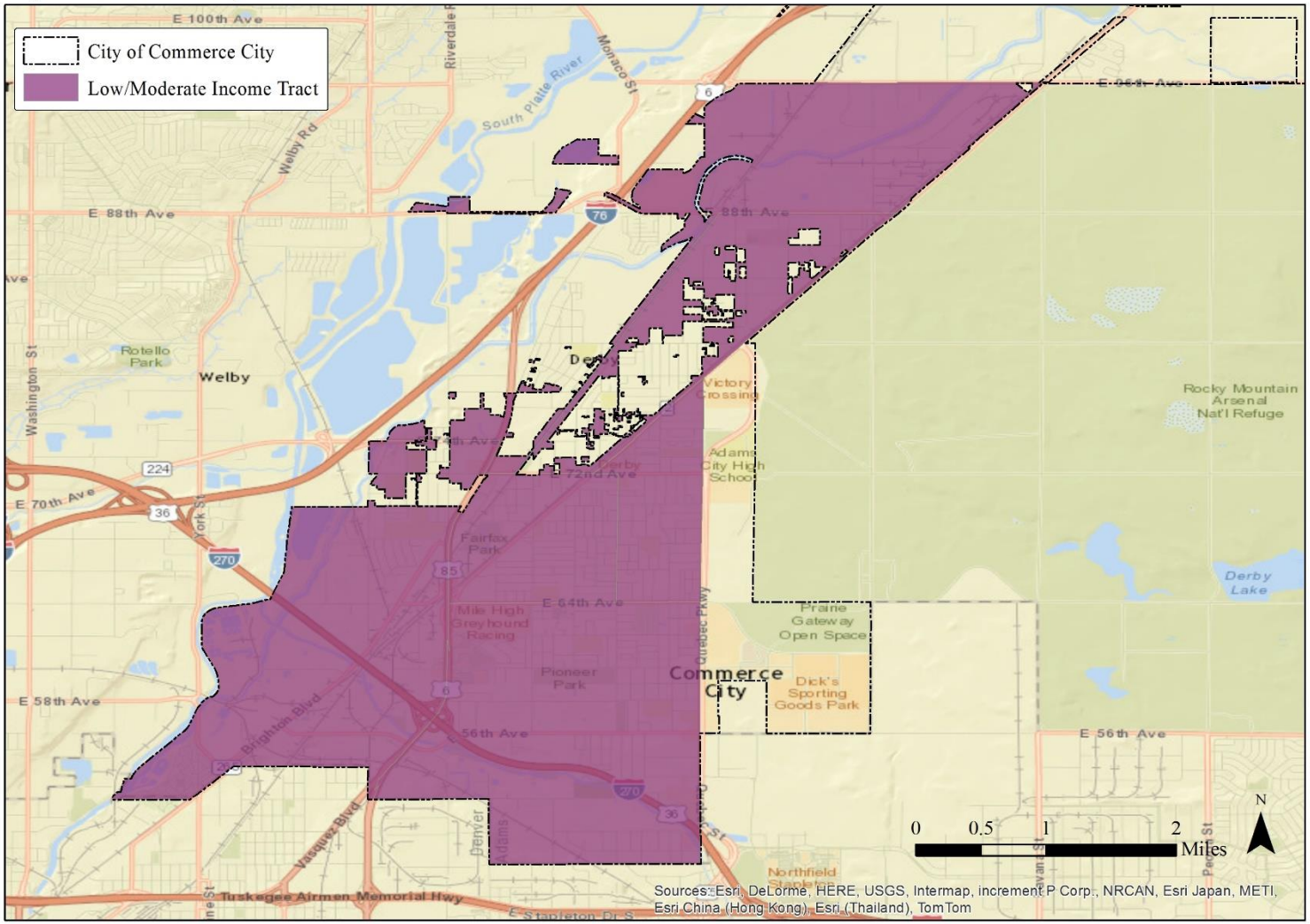
City of Commerce City Low and Moderate Income Census Tracts



Source: FY 2015 Low and Moderate Income Summary Data from https://www.hudexchange.info/manage-a-program/acs-low-mod-summary-data-block-groups-places/

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

Priority Needs

During the development of the Consolidated Plan, a number of priority needs were identified. The funding priorities and guidelines for addressing these priority needs are summarized on the following pages.

Funding Priorities and Guidelines

- High priorities are those activities that will be considered for CDBG funding during the five-year consolidated plan period prior to low priority projects.
- Low priorities are those activities that will be considered for CDBG funding only following the consideration of high priority items.
- Commerce City will consider providing certifications of consistency and supporting applications submitted by other entities for non-City funds when those projects are aligned with these priority needs.

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1	Priority Need Name	**NEIGHBORHOOD REVITALIZATION**
	Priority Level	High
	Population Served	Extremely Low-Income Low-Income Moderate-Income Disabled (Physical, Mental, Behavioral Health) Elderly and Frail Elderly Children and Youth Homeless and At-Risk Populations
	Associated Goals	Sidewalk Construction and Repair Local Bus Stop Improvements Construction of ADA Ramps Drainage Improvements Revolving Loan Fund Business Incubator Demolition and Clearance Public Services Minor Home Repair
	Description	• Fund non-housing community development proposals that eliminate blight, to include sidewalk construction and repair, street maintenance and improvements, streetscaping, street lighting, bus stop improvements, demolition and redevelopment, and other improvements not listed here. • Coordinate and provide support for local neighborhood beautification and litter clean-up efforts. • Provide economic development and small business support services to entrepreneurs to revitalize blighted commercial districts.
	Basis for Priority	Interviews with key community stakeholders, public meeting input, and survey data

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2	Priority Need Name	**PRESERVE AND EXPAND AFFORDABLE HOUSING**
	Priority Level	High
	Population Served	Extremely Low-Income Low-Income Moderate-Income
	Associated Goals	Minor Home Repair
	Description	• Support local efforts to increase affordable housing options, particularly for the elderly. • Extend the useful life of existing affordable housing through rehabilitation, emergency repair, and weatherization programs.
	Basis for Priority	Interviews with key community stakeholders, public meeting input, survey data, HUD's CHAS data and other information on cost burden, market analysis
3	Priority Need Name	**ECONOMIC DEVELOPMENT**
	Priority Level	High
	Population Served	Extremely Low-Income Low-Income Moderate-Income
	Associated Goals	Job Training Revolving Loan Fund Business Incubator
	Description	• Provide programs offering job skills training, education, and other assistance to enhance Commerce City residents' economic competitiveness. • Support entrepreneurs and business development to create new employment opportunities. • Create a small business incubator to foster and grow small businesses. • Operate a loan program to help local business owners with capital to start or expand a business.
	Basis for Priority	Interviews with key community stakeholders, public meeting input, survey data

4	Priority Need Name	**PUBLIC SERVICES SUPPORTING LOW-INCOME AND SPECIAL NEEDS POPULATIONS**
	Priority Level	High
	Population Served	Extremely Low-Income Low-Income Moderate-Income Disabled (Physical, Mental, Behavioral Health) Elderly and Frail Elderly Children and Youth Homeless and At-Risk Populations
	Associated Goals	Job Training Business Incubator Public Services
	Description	• Fund community services including youth-focused activities, programming for seniors, crime prevention, drug abuse education, and employment training. • Assist with the coordination of local organizations and resources to enhance the community's ability to meet its needs and challenges. Assist persons who are homeless through emergency, transitional, and permanent housing and supportive services. • Assist households at risk of homelessness with short-term rental payment and other assistance.
	Basis for Priority	Needs assessment, stakeholder interviews, public meeting comments, survey data
5	Priority Need Name	**AFFIRMATIVELY FURTHER FAIR HOUSING CHOICE**
	Priority Level	High
	Population Served	All
	Associated Goals	Affirmatively Further Fair Housing Choice
	Description	• Make funding available for fair housing activities to include potential award(s) to local organizations to encourage provision of fair housing education, complaint handling services, and/or enforcement.
	Basis for Priority	Stakeholder input, impediments identified in Adams County Analysis of Impediments.

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6	Priority Need Name	**PROGRAM ADMINISTRATION AND PLANNING**
	Priority Level	High
	Population Served	All
	Associated Goals	Administration and Planning
	Description	• Funding for performance of CDBG administrative requirements.
	Basis for Priority	Needs Assessment

Table 44 – Priority Needs Summary

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SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	Cost of housing, most specifically rental housing, is the primary factor affecting the need for Tenant Based Rental Assistance (TBRA). Comprehensive Housing Affordability Strategy (CHAS) data provided by HUD based on the 2008-2012 American Community Survey shows that 755 renters with incomes below 30% Area Median Income (AMI) are severely cost burdened (i.e., spend more than 50% of their income on housing needs). An additional 115 renters with incomes from 30-80% AMI have a severe cost burden. Levels of homelessness and households at risk for homelessness also influence the need for TBRA, which is often a part of rapid re-housing and homelessness prevention efforts. Other factors that will influence TBRA funding include wait lists at existing public and subsidized housing; levels of rental market supply, rental rates, and vacancy rates; and efforts to reduce concentrations of poverty and subsidized housing.
TBRA for Non-Homeless Special Needs	Rental housing affordability (as described above) is also a primary factor affecting the need for TBRA for special needs populations. The locations of affordable housing, particularly as related to access to services and community facilities, will also influence the need for TBRA for special needs groups, including persons with mental or physical disabilities, victims of domestic violence, and the elderly. Supply levels, rental rates, and vacancy rates or waiting lists for existing special needs housing, including public and other subsidized housing and housing with handicap accessibility and supportive services, will also influence the need for TBRA for non-homeless special needs populations.
New Unit Production	Funding for the production of new units will depend on a variety of market factors, including: • Land costs; • Availability of city-owned land; • Cost of necessary infrastructure improvements; • Construction requirements and costs, including building materials and labor; • Permitting fees, impact fees, and other regulatory costs; • Interest rates; • Supply levels and rental rates/sales prices of privately-developed housing; • Potential opportunities for partnerships with non-profit and for-profit developers; • Age and upkeep of existing affordable housing stock; and • Vacancy rates or waiting lists at existing affordable housing developments. When providing funds for new construction, Commerce City will consider the locations of existing affordable housing to avoid concentrating subsidized housing in specific areas of the city.

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Rehabilitation	Funding for the rehabilitation of affordable housing will be influenced by many of the same factors as the production of new units: age and condition of existing units, energy efficiency improvements needed in existing units, vacancy rates, construction requirements/costs, and interest rates. The use of funds for rehabilitation may also be affected by land costs and overall costs of new construction, serving as a more viable option in comparison to the cost of new construction. Additionally, the condition of neighborhoods surrounding potential single- and multifamily housing rehabilitation sites will influence Commerce City's funding decisions. In many cases, housing revitalization has multiple positive effects on the surrounding neighborhood by improving blighted properties and improving adjacent roads and infrastructure.
Acquisition, including preservation	The acquisition of residential land and/or existing housing will depend on the number and locations of tax delinquent, dilapidated, and/or foreclosed properties in Commerce City. Potential acquisition of multifamily rental housing will be influenced by the age and condition of the housing stock, acquisition costs compared to costs of new construction or rehabilitation, and the availability of foreclosed property or other strategic opportunities. Subsidized housing developments anticipated to age out of their affordability period may also influence housing acquisition and preservation.

Table 45 – Influence of Market Conditions

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

Introduction

Entitlement grant resources totaling $386,340 are anticipated for the 2016-2017 fiscal year to provide decent housing, suitable living environments, and expanded economic opportunities. Commerce City seeks to use its CDBG Program funds to serve the needs of low- to moderate-income persons and households in partnership with capable agencies to include public and private partners, developers, financial lending institutions, and nonprofits. Below is a description of the anticipated funding for the CDBG Programs based on the allocation for the current program year.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan 2018-2020
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $	
CDBG	**Public-Federal**	○ Public services ○ Infrastructure and facility improvements ○ Housing ○ Economic development ○ Administration ○ Fair housing	**$386,340**	**$0**	**$0**	**$386,340**	**$1,545,360**

Table 46 - 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

Projects selected for funding by Commerce City will leverage additional community resources, including public and private agency funds. Monies dedicated to infrastructure improvements capitalize on ongoing City revitalization and capital improvement efforts. Public service funds are granted to agencies with additional public and/or private funding streams that provide a variety of services in addition to those supported by CDBG funds.

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

Commerce City has a publicly owned small business center located in the Derby area. This center can help address the economic development and anti-poverty needs addressed in this plan. The City also has a recreational public detention pond at the dog track site that may be used in connection with planned drainage improvements in the area.

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SP-40 Institutional Delivery Structure – 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
Commerce City	Local Government	CDBG program administration	Commerce City

Table 47 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

The institutional delivery system offers multiple services to the City's low- and moderate-income residents, special needs populations, and the homeless. In addition to working with the local agencies and non-profits to meet homeless needs, the City has partnerships within its delivery system to meet affordable housing needs for low- and moderate-income families. The City will continue collaborative efforts with local non-profits and social service organizations.

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			
Street Outreach Services			
Law Enforcement	x		
Mobile Clinics			
Other Street Outreach Services			
Supportive Services			
Alcohol & Drug Abuse	x	x	
Child Care	x		
Education	x		
Employment and Employment Training	x		
Healthcare	x		
HIV/AIDS	x		x
Life Skills	x	x	x
Mental Health Counseling	x	x	x
Transportation	x		
Other			
Other			

Table 48 - Homeless Prevention Services Summary

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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)

During the preparation of the Consolidated Plan, Commerce City consulted with public and private agencies that provide services to homeless persons in all subcategories to include chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. Some of the services proposed in the plan may be conducted by subrecipients and contractors, or in collaboration with other nonprofits on behalf of the City.

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

Although the City has been successful at working with many of the nonprofit organizations in the community, one of the major gaps in service delivery is shelters and supportive services for homeless individuals, such as supportive housing and transitional housing services.

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

The development of social service collaborations across the region to coordinate the work of social service organizations, disseminate news and information, and spearhead community-wide solutions to local needs is necessary to assist the community in overcoming gaps in services for the homeless and reduce duplication of services.

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SP-45 Goals Summary – 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	Sidewalk Construction and Repair	2016	2021	Non-Housing Community Development	Citywide	Neighborhood Revitalization	$264,072	Public facility or infrastructure other than low/moderate income housing benefit: 2 Miles of Sidewalks
2	Local Bus Stop Improvements	2016	2021	Non-Housing Community Development	Citywide	Neighborhood Revitalization	$30,000	Public facility or infrastructure other than low/moderate income housing benefit: 10 Bus Stops
3	Construction of ADA Ramps	2017	2021	Non-Housing Community Development	Citywide	Neighborhood Revitalization	$10,000	Public facility or infrastructure other than low/moderate income housing benefit: 10 Ramps
4	Drainage Improvements	2017	2021	Non-Housing Community Development	Citywide	Neighborhood Revitalization	$375,000	Public facility or infrastructure other than low/moderate income housing benefit: 1 Site Improved
5	Job Training	2017	2021	Economic Development	Citywide	Economic Development, Public Services Supporting Low-Income and Special Needs Populations	$75,000	Public service activities other than Low/Moderate Income Housing Benefit: 40 Persons
6	Revolving Loan Fund	2017	2021	Economic Development	Citywide	Economic Development, Neighborhood Revitalization	$300,000	Businesses assisted: 8 Businesses
7	Business Incubator	2017	2021	Economic Development	Citywide	Economic Development, Neighborhood Revitalization, Public Services Supporting Low-Income and Special Needs Populations	$200,000	Businesses assisted: 8 Businesses

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8	Demolition & Clearance	2017	2021	Non-Housing Community Development	Citywide	Neighborhood Revitalization	$75,000	2 Buildings
9	Public Services	2017	2021	Non-Housing Community Development	Citywide	Public Services Supporting Low-Income and Special Needs Populations, Neighborhood Revitalization	$50,000	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons
10	Minor Home Repair	2017	2021	Affordable Housing	Citywide	Preserve & Expand Affordable Housing, Neighborhood Revitalization	$150,288	Homeowner Housing Rehabilitated: 12 Units
11	Affirmatively Further Fair Housing Choice	2017	2021	Fair Housing	Citywide	Affirmatively Further Fair Housing Choice	$1,000	Public service activities other than Low/Moderate Income Housing Benefit: 80 Persons
12	Administration & Planning	2016	2021	Non-Housing Community Development	Citywide	Administration & Planning	$386,340	Other

Table 49 – Goals Summary

Goal Descriptions

1	**Goal Name**	Sidewalk Construction and Repair
	Goal Description	Construction of new sidewalks and repair of existing sidewalks to facilitate pedestrian connections and counter blight conditions.
2	**Goal Name**	Local Bus Stop Improvements
	Goal Description	Installation of trash receptacles, concrete pads, and bus benches at bus stops along local routes to reduce litter and counter blight conditions.
3	**Goal Name**	Construction of ADA Ramps
	Goal Description	Construction of ramps to improve accessibility of buildings and facilities for people with mobility impairments.
4	**Goal Name**	Drainage Improvements
	Goal Description	Drainage improvements and site work necessary to prepare vacant land for redevelopment.

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5	**Goal Name**	Job Training
	Goal Description	Programs offering job skills training, education, and other assistance to enhance residents' economic competitiveness.
6	**Goal Name**	Revolving Loan Fund
	Goal Description	Operate a loan program to help local business owners with capital to start or expand a business.
7	**Goal Name**	Business Incubator
	Goal Description	Create a small business incubator to foster and grow small businesses.
8	**Goal Name**	Demolition and Clearance
	Goal Description	Demolition of abandoned residential and/or commercial structures to counter blight conditions and ready sites for redevelopment.
9	**Goal Name**	Public Services
	Goal Description	Varied community services including youth-focused activities, programming for seniors, crime prevention, drug abuse education, employment training, and assistance to homeless people or those at-risk of homelessness.
10	**Goal Name**	Minor Home Repair
	Goal Description	Rehabilitation, weatherization, or emergency repair of existing homeowner housing units.
11	**Goal Name**	Affirmatively Further Fair Housing Choice
	Goal Description	Implementation of various fair housing initiatives to include outreach, education, and/or periodic testing to detect any discriminatory practices within the community.
12	**Goal Name**	Administration and Planning
	Goal Description	Administration and planning functions associated with the CDBG grant.

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)

Commerce City does not receive HOME funds, however, the City expects to serve 12 income-eligible homeowners with home repair and rehabilitation over the five-year period covered by this plan.

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SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The Adams County Housing Authority (ACHA) and the Commerce City Housing Authority (CCHA) are currently compliant with fair housing and civil rights requirements and neither is under a voluntary compliance agreement related to Section 504.

Activities to Increase Resident Involvements

The CCHA developed a strategic plan in 2011, a process that was guided by stakeholder involvement. Through an open house, surveys, and presentations to community groups, CCHA engaged nonprofit organizations, City staff, current and former CCHA board members, clergy and faith leaders, and affordable housing advocates.

ACHA invites feedback from its residents through quarterly meetings of the Resident Advisory Board. This board is composed entirely of ACHA's public housing residents. Additionally, a seat on the ACHA's Board of Commissioners is reserved for a low-income representative.

Is the public housing agency designated as troubled under 24 CFR part 902?

CCHA is not a HUD-funded public housing authority and is therefore not subject to HUD reporting and monitoring requirements. The ACHA is designated a "High Performer" based on its 2014 score report in the Public Housing Assessment System, with maximum scores for the agency's financials, management, and capital fund health. The following table provides a score breakdown by indicator:

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

Plan to remove the 'troubled' designation

Not applicable.

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SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Housing affordability is a key issue affecting the entire Denver area, including Commerce City, and is driven primarily by supply and demand. Between 2014 and 2015, Denver's population grew by 2.7%, making it the fastest-growing of America's 50 largest cities.[3] During the same 2014-2015 span, Census data shows that Commerce City's population grew by 3.6% from 51,831 to 53,696. Despite this strong population growth, addition of new housing units has not kept pace, resulting in a relative scarcity of housing which has, in turn, driven up prices.

Based on Commerce City's average household size of 3.15 people, the city's 53,696 residents would require approximately 17,046 housing units, however, as of the Census's last count (2010-2014 ACS Estimates), the figure was 15,626, a shortfall of over 1,400 units or 9.0%. The shortage of available units was borne out in comments from Commerce City residents in public meetings and other settings. Residents frequently cited concern about rapidly increasing housing costs, reporting anecdotal examples of rents increasing 50% from one year to the next. Subsidized housing, especially apartments for seniors, seldom have vacancies and waiting lists for public housing and Housing Choice Vouchers in Commerce City are closed.

Adams County's 2015 Analysis of Impediments to Fair Housing Choice included a review of public policies and the effects of those policies on housing availability. That analysis concluded that neither local building codes, nor planning, permitting, or development review processes posed significant barriers to housing development in the County or in its cities. However, development-related costs (land costs, labor, materials, tap fees, impact fees, and the costs of assuaging NIMBY sentiments particularly directed at multifamily housing) were determined to have a significant negative effect on development of new housing.

Stakeholders interviewed in the course of preparing this plan also cited Colorado's construction defect laws as contributing to the lack of affordable multifamily housing supply. The well-intentioned state laws were designed to protect homebuyers from defective housing construction, but in allowing class action lawsuits from as few as two homeowners against a builder or other construction industry professional, the industry has all but stopped producing multifamily housing due to the high risk of litigation and the associated costs of insurance against such legal claims. Where multifamily housing is being constructed, it typically must exceed a $400,000 per unit price point in order to cover the builder's insurance costs.

[3] "Denver tops U.S. city population gain rate in 2015". The Denver Post, May 19, 2016. http://www.denverpost.com/2016/05/19/chart-denver-tops-u-s-city-population-gain-rate-in-2015/

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Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Affordable Housing is one of Commerce City's three strategic housing-related goals appearing in the City's C3 Vision Plan. In addition to promoting a mix of housing types and price ranges the plan specifically calls for "housing that is affordable, not only to buy or rent but also that is cost-efficient and healthy to live in, is important to enable more residents to live near where they work to allow them to become economically self-sufficient." The plan prioritizes affordable housing that is accessible to transit.

The City's Comprehensive Plan outlines several policies and strategies aimed at increasing housing affordability. These include:

- **Rehabilitated Homes** (Citywide Policy HN 1.1)
  The preservation of existing housing stock (rental and ownership housing) and its rehabilitation helps prevent loss due to deterioration. It ensures that it will remain available to working families. Rehabilitated homes should be evaluated for environmental hazards. Identified hazards (e.g., lead-based paint, friable asbestos) will be mitigated before houses are re-occupied.

- **Variety of Housing Types and Mixed-Uses within Neighborhoods** (Citywide Policy HN 2.1)
  Encourage new neighborhoods that contain a mix of housing types, ranging from single-family detached, attached, townhomes, apartments, lofts, and housing for special needs (e.g., seniors). Site plans should include a mix of lot sizes, development densities, as well as housing types and styles, with high-density and multi-family housing near collector and arterial streets, transit, and services.

- **Neighborhoods for Mixed Incomes** (Citywide Policy HN 3.1)
  New neighborhoods should contain a range of housing priced at different points for mixed incomes, to achieve overall diversity.

- **Affordable Housing Options Maintained** (Citywide Policy HN 3.3)
  Continue to support existing affordable housing options, partnerships, and programs to address the continued maintenance of the city's affordable stock, including existing maintained mobile home parks in the Historic City; multi-family housing; and affordable, small, single-family homes. Future affordable housing will be located throughout the community near jobs and services, so that pockets of low-income housing do not occur.

Detailed strategies, goals, and outcome indicators for each of these affordable housing-focused policies are contained in the City's C3 Vision Plan. Additionally, the Adams County 2015 Analysis of Impediments identifies three action steps being undertaken at a county level to combat development-related factors limiting affordable housing. These steps include general community

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education on the need for and importance of affordable housing, offering training for housing industry representatives on the benefits of building neighborhoods with diverse housing types, and maintaining a countywide inventory of potential multifamily development sites.

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SP-60 Homelessness Strategy – 91.215(d)

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

Commerce City has identified homelessness as a priority need for the city over the next five years. To address this need, the City will support efforts by local nonprofit organizations and by Adams County to provide outreach and case management services to assess individual needs and link them with appropriate services.

Addressing the emergency and transitional housing needs of homeless persons

Over the next five years, the City of Commerce City will explore opportunities to partner with local nonprofit organizations to expand emergency and transitional housing for homeless persons. While these resources currently exist in the city, stakeholder input indicates that demand surpasses the availability of housing. Commerce City will also work with Adams County and surrounding municipalities to identify opportunities to address homelessness collaboratively.

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

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

Over the next five years, the City of Commerce City will look for opportunities to partner with local service agencies to expand housing opportunities and services for homeless persons, including those making the transition to permanent housing.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

In addition to identifying homelessness as a priority need, this Plan also identifies the need for additional affordable housing. The City of Commerce City and the Commerce City Housing Authority will continue to work with local partners to develop additional affordable housing units over the next five years. The City will also develop potential opportunities to support rapid

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rehousing and homelessness prevention efforts in conjunction with local housing and service providers, Adams County, and the Commerce City and Adams County Housing Authorities.

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SP-65 Lead based paint Hazards – 91.215(i)

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

The incidents of childhood exposure to lead-based paint are significant across the City, with recent 2010-2014 ACS data indicating that 26% of children in owner-occupied housing and 20% of children in rental housing under the age of 6 are at risk of lead-based hazards, based on age of housing stock. The City will make referrals as appropriate to the Colorado Public Health Department to identify and use agencies certified to conduct lead screenings and also properties proposed for rehabilitation will be screened for lead-based paint, and property owners will be provided with educational information.

How are the actions listed above related to the extent of lead poisoning and hazards?

Lead poisoning is the leading environmental hazard to children, creating devastating and irreversible health problems. The primary cause of lead poisoning is exposure to dust from deteriorating paint in homes constructed before 1978. This is due to the high lead content used in paint during that period, and particularly in homes built before 1950. Pre-1978 housing occupied by lower income households with children offers particularly high risks of lead exposure due to the generally lower levels of home maintenance among lower income households. This is an important factor since it is not the lead paint itself that causes the hazards, but rather the deterioration of the paint that releases lead-contaminated dust and allows children to peel and eat lead-contaminated flakes.

<u>The risk factors for lead poisoning include:</u>

- Living in a home built before 1950
- Living in a recently remodeled home originally built before 1978

The U.S. Environmental Protection Agency's *"Report on the National Survey of Lead-Based Paint in Housing"* released in 1995 found that 83% of the nation's privately owned housing units built before 1980 had lead-based paint somewhere in the building.[4] The survey found "no statistically significant differences in the prevalence of lead-based paint by type of housing, market value of the home, amount of rent payment, household income, or geographic region".

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

As the City develops and initiates its CDBG activities over the course of this five year plan period, it will ensure its policies and procedures call for full compliance with the lead-based paint

[4] Report on the National Survey of Lead-Based Paint in Housing: Base Report. U.S. EPA/HUD, June 1995. http://www.epa.gov/lead/pubs/r95-003.pdf.

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regulations at 24 CFR Part 35. Contractors, sub recipients, and other community partners will be advised of the lead-based paint regulations and the City will work with them to ensure inspection, testing, and abatement of lead hazards wherever necessary. Additionally, the City will distribute required information and literature on lead hazards to households undergoing CDBG-funded rehabilitation.

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SP-70 Anti-Poverty Strategy – 91.215(j)

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

A crucial part of Commerce City's anti-poverty efforts is to provide job training, employment, contract opportunities, and small business development opportunities for low- or very-low income and moderate-income residents with a focus on the increase and development of jobs within the City. The City collaborates with local colleges and community colleges to foster job readiness, job training, employment services, and small business development services. Local community colleges provide additional classes and training related to small business development and implementation and job training programs. Life skills, employment, and job training activities will be continuously offered in areas with high concentrations of low-income residents.

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

The jurisdiction's poverty reduction programs and the affordable housing programs detailed in this plan are managed by Commerce City, and the Commerce City Housing Authority is closely aligned with the City government. These relationships allow for strong coordination of program offerings, performance goals, and policies related to poverty reduction and affordable housing.

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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

Monitoring is an ongoing process that will assess the quality of Commerce City's CDBG program operations and performance over time and help to prevent instances of fraud, waste and abuse. Implementation of the City's monitoring process will not only ensure effective and efficient operations, but compliance with federal program standards and regulations. The City will rely upon the following tools and guidance in executing its monitoring process:

- The CPD Monitoring Handbook (HUD Handbook 6509.2)
- The HUD Monitoring Desk Guide

Monitoring involves a three-step process to ensure that all statutory and regulatory requirements are being met:

1. Upon the selection of projects for funding and inclusion in the Annual Action Plan, Commerce City staff will review the proposed projects for CDBG eligibility and to ensure they each meet a National Objective. In documenting determinations of eligibility, staff will use the applicable review checklists found in Chapter 3 of the CPD Monitoring Handbook (Exhibits 3-1 through 3-9).
2. No later than the ninth month of Commerce City's CDBG program year (currently June) city staff will review each funded CDBG activity for compliance with program parameters. These reviews may be desk audits when requisite documentation is available, but may also include site visits to validate the records on file. City staff will use any applicable review checklists found in the CPD Monitoring Handbook (generally Exhibits 3-10 through 3-22 and/or 26-2) to conduct these monitoring reviews.
3. Before any drawdown of CDBG funds in IDIS, Commerce City's staff will conduct a financial review of the costs being paid to determine consistency with the City's financial policies and procedures.

As the City's capacity with regard to management of the CDBG program grows, and the variety and number of funded projects increases, staff may find it advantageous to conduct a nine-month review only of a sample of funded projects. In such a case, the selection of a sample for monitoring must be based upon a risk analysis similar to that described by CPD Notice 14-04 whereby all projects are screened for their potential noncompliance risk and monitored accordingly. No less than one-third of Commerce City's funded CDBG projects will be individually monitored in any program year.

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Expected Resources

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

Introduction

Entitlement grant resources totaling $386,340 are anticipated for the 2016-2017 fiscal year to provide decent housing, suitable living environments, and expanded economic opportunities. Commerce City seeks to use its CDBG Program funds to serve the needs of low- to moderate-income persons and households in partnership with capable agencies to include public and private partners, developers, financial lending institutions, and nonprofits. Below is a description of the anticipated funding for the CDBG Programs based on the allocation for the current program year.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan 2018-2020
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $	
CDBG	**Public-Federal**	○ Public services ○ Infrastructure and facility improvements ○ Housing ○ Economic development ○ Administration ○ Fair housing	**$386,340**	**$0**	**$0**	**$386,340**	**$1,545,360**

Table 50 - 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

Projects selected for funding by Commerce City will leverage additional community resources, including public and private agency funds. Monies dedicated to infrastructure improvements capitalize on ongoing City revitalization and capital improvement efforts. Public service funds are granted to agencies with additional public and/or private funding streams that provide a variety of services in addition to those supported by CDBG funds.

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

Commerce City has a publicly owned small business center located in the Derby area. This center can help address the economic development and anti-poverty needs addressed in this plan. The

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City also has a recreational public detention pond at the dog track site that may be used in connection with planned drainage improvements in the area.

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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	Sidewalk Construction and Repair	2016	2021	Non-Housing Community Development	Citywide	Neighborhood Revitalization	$264,072	Public facility or infrastructure other than low/moderate income housing benefit: 2 Miles of Sidewalks
2	Local Bus Stop Improvements	2016	2021	Non-Housing Community Development	Citywide	Neighborhood Revitalization	$30,000	Public facility or infrastructure other than low/moderate income housing benefit: 10 Bus Stops
3	Construction of ADA Ramps	2017	2021	Non-Housing Community Development	Citywide	Neighborhood Revitalization	$10,000	Public facility or infrastructure other than low/moderate income housing benefit: 10 Ramps
4	Drainage Improvements	2017	2021	Non-Housing Community Development	Citywide	Neighborhood Revitalization	$375,000	Public facility or infrastructure other than low/moderate income housing benefit: 1 Site Improved
5	Job Training	2017	2021	Economic Development	Citywide	Economic Development, Public Services Supporting Low-Income and Special Needs Populations	$75,000	Public service activities other than Low/Moderate Income Housing Benefit: 40 Persons
6	Revolving Loan Fund	2017	2021	Economic Development	Citywide	Economic Development, Neighborhood Revitalization	$300,000	Businesses assisted: 8 Businesses

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7	Business Incubator	2017	2021	Economic Development	Citywide	Economic Development, Neighborhood Revitalization, Public Services Supporting Low-Income and Special Needs Populations	$200,000	Businesses assisted: 8 Businesses
8	Demolition & Clearance	2017	2021	Non-Housing Community Development	Citywide	Neighborhood Revitalization	$75,000	2 Buildings
9	Public Services	2017	2021	Non-Housing Community Development	Citywide	Public Services Supporting Low-Income and Special Needs Populations, Neighborhood Revitalization	$50,000	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons
10	Minor Home Repair	2017	2021	Affordable Housing	Citywide	Preserve & Expand Affordable Housing, Neighborhood Revitalization	$150,288	Homeowner Housing Rehabilitated: 12 Units
11	Affirmatively Further Fair Housing Choice	2017	2021	Fair Housing	Citywide	Affirmatively Further Fair Housing Choice	$1,000	Public service activities other than Low/Moderate Income Housing Benefit: 80 Persons
12	Administration & Planning	2016	2021	Non-Housing Community Development	Citywide	Administration & Planning	$386,340	Other

Table 51 – Goals Summary

Goal Descriptions

1	**Goal Name**	Sidewalk Construction and Repair
	Goal Description	Construction of new sidewalks and repair of existing sidewalks to facilitate pedestrian connections and counter blight conditions.
2	**Goal Name**	Local Bus Stop Improvements
	Goal Description	Installation of trash receptacles, concrete pads, and bus benches at bus stops along local routes to reduce litter and counter blight conditions.

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3	**Goal Name**	Construction of ADA Ramps
	Goal Description	Construction of ramps to improve accessibility of buildings and facilities for people with mobility impairments.
4	**Goal Name**	Drainage Improvements
	Goal Description	Drainage improvements and site work necessary to prepare vacant land for redevelopment.
5	**Goal Name**	Job Training
	Goal Description	Programs offering job skills training, education, and other assistance to enhance residents' economic competitiveness.
6	**Goal Name**	Revolving Loan Fund
	Goal Description	Operate a loan program to help local business owners with capital to start or expand a business.
7	**Goal Name**	Business Incubator
	Goal Description	Create a small business incubator to foster and grow small businesses.
8	**Goal Name**	Demolition and Clearance
	Goal Description	Demolition of abandoned residential and/or commercial structures to counter blight conditions and ready sites for redevelopment.
9	**Goal Name**	Public Services
	Goal Description	Varied community services including youth-focused activities, programming for seniors, crime prevention, drug abuse education, employment training, and assistance to homeless people or those at-risk of homelessness.
10	**Goal Name**	Minor Home Repair
	Goal Description	Rehabilitation, weatherization, or emergency repair of existing homeowner housing units.
11	**Goal Name**	Affirmatively Further Fair Housing Choice
	Goal Description	Implementation of various fair housing initiatives to include outreach, education, and/or periodic testing to detect any discriminatory practices within the community.
12	**Goal Name**	Administration and Planning
	Goal Description	Administration and planning functions associated with the CDBG grant.

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Projects

AP-35 Projects – 91.220(d)

Introduction

Projects planned for the 2016-2017 program year are identified below. Additional details are provided in Section AP-38.

Projects

#	Project Name
1	CDBG Program Administration
2	Sidewalk Construction – Quebec Street
3	Sidewalk Construction – Core/Historic City
4	Local Bus Stop Improvements

Table 52 – Project Information

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

Year 1 allocation priorities were developed based on input received from the community, including citizens and representatives from nonprofit agencies, housing providers, homeless housing and service providers, fair housing advocates, community development organizations, and others. Data regarding housing needs, homeless needs, needs of non-homeless special populations, and non-housing community development needs also informed allocation priorities. Finally, this project list was developed to complement ongoing revitalization efforts and plans, and to ensure that adequate administration capacity is available for each identified project. The City of Commerce City does not anticipate obstacles to successfully completing the above-listed projects.

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AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG Administration
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Program Administration and Planning
	Funding	CDBG: $77,268
	Description	The management and oversight of the CDBG Programs by the City of Commerce City Community Development Department
	Target Date	9/30/2017
	Estimate the number and type of persons that will benefit from the proposed activity	Not applicable
	Location Description	7887 E. 60th Avenue, Commerce City, CO 80022
	Planned Activities	Administration
2	Project Name	Sidewalk Construction – Quebec Street
	Target Area	Census tract TBD
	Goals Supported	Public Infrastructure Improvements
	Needs Addressed	Public Infrastructure Improvements
	Funding	CDBG: $100,000

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	Description	Construction of sidewalks along Quebec Street to improve pedestrian access
	Target Date	9/30/2017
	Estimate the number and type of persons that will benefit from the proposed activity	TBD based on census tract
	Location Description	Quebec Street, south of E. 60th Avenue to the Denver County line.
	Planned Activities	Sidewalk construction
3	**Project Name**	Sidewalk Construction – Core City
	Target Area	Census tracts TBD
	Goals Supported	Public Infrastructure Improvements
	Needs Addressed	Public Infrastructure Improvements
	Funding	CDBG: Amount $179,072
	Description	Construction of sidewalks within the Core City to improve pedestrian access
	Target Date	9/30/2017
	Estimate the number and type of persons that will benefit from the proposed activity	TBD based on census tracts
	Location Description	Various Low and Moderate Income Neighborhoods South of E. 88th Avenue which are currently missing or lacking sidewalks.
	Planned Activities	Sidewalk construction

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4		
	Project Name	Local Bus Stop Improvements
	Target Area	Census tracts TBD
	Goals Supported	Public Infrastructure Improvements
	Needs Addressed	Public Infrastructure Improvements
	Funding	CDBG: $30,000
	Description	Installation of trash receptacles, concrete pads, and bus waiting benches at bus stops along RTD bus routes
	Target Date	9/30/2017
	Estimate the number and type of persons that will benefit from the proposed activity	TBD based on census tracts
	Location Description	Installation to occur in low to moderate neighborhoods south of E. 88th Avenue
	Planned Activities	Installation of trash receptacles, concrete pads, and bus waiting benches s at bus stops
	CDBG Total	**$386,340**

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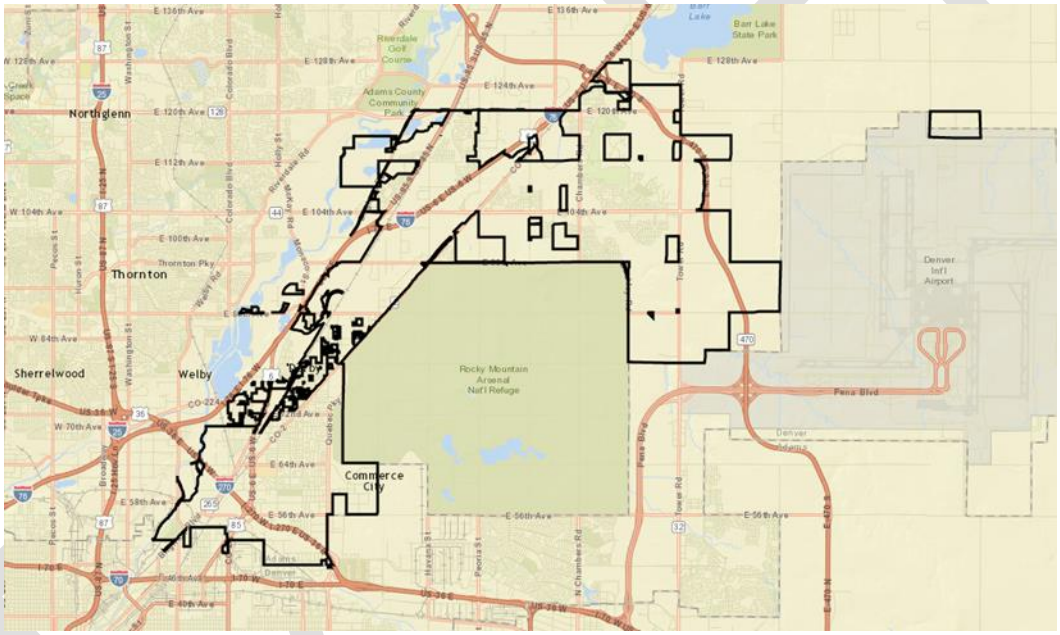
AP-50 Geographic Distribution – 91.220(f)

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 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 bound on its west generally by the South Platte River. Brighton, the Adams County seat, is to the City's north and the municipalities of Aurora and Thornton are also adjacent. Commerce City's thriving industrial economy depends on Commerce City's rich transportation connectivity: I-76, I-270, and E-470 all traverse the City in addition to three different railroads. The City's area is approximately 41 square miles.

Commerce City, Colorado – General Map



Source: HUD CPD Maps, http://egis.hud.gov/cpdmaps/

The following two maps depict the low- and moderate-income census tracts within Commerce City. The areas shaded on the maps will generally be prioritized for allocation of CDBG resources, however, individual low- and moderate-income persons residing anywhere in the City may be eligible beneficiaries of CDBG funds.

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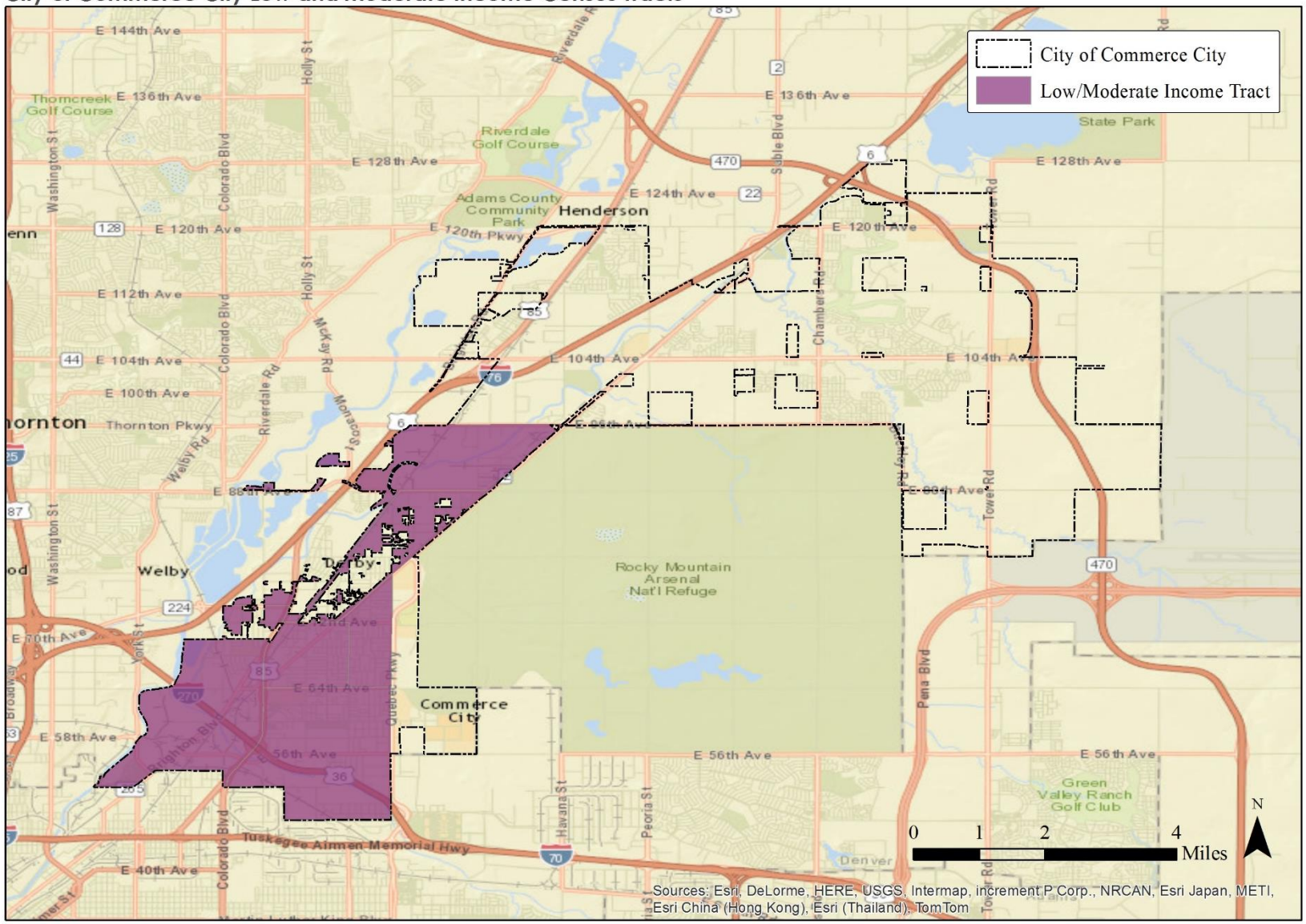
City of Commerce City Low and Moderate Income Census Tracts



Source: FY 2015 Low and Moderate Income Summary Data from https://www.hudexchange.info/manage-a-program/acs-low-mod-summary-data-block-groups-places/

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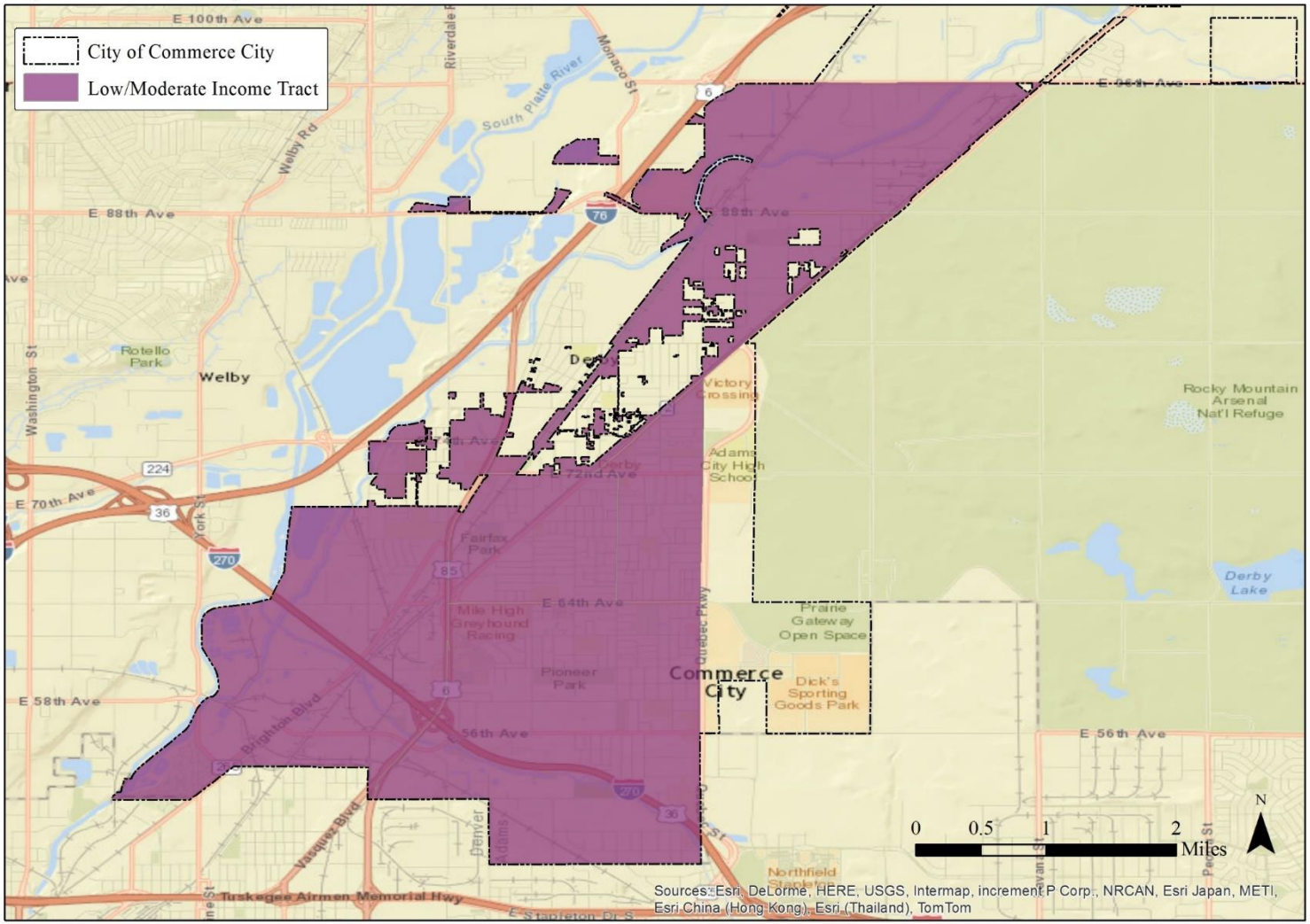
City of Commerce City Low and Moderate Income Census Tracts



Source: FY 2015 Low and Moderate Income Summary Data from https://www.hudexchange.info/manage-a-program/acs-low-mod-summary-data-block-groups-places/

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Geographic Distribution

Target Area	Percentage of Funds
Citywide	100%

Table 53 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Commerce City proposes to distribute its CDBG resources throughout the City to the extent neighborhoods receiving CDBG investments are eligible under CDBG area benefit or other applicable standards. Otherwise, the City does not intend to target CDBG funds to any particular area.

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Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

Commerce City is committed to the goal of providing decent, safe, and affordable housing and improving the quality of life for its residents. The need for affordable rental and homeownership housing was a common theme heard during the Consolidated Plan development process. The greatest need is among renters with very low incomes, large families, immigrant families, senior residents, and residents with disabilities. To address these needs, the City expects to grow its capacity so as to implement affordable housing-focused CDBG activities in future program years. In some instances, the City may use grant funds for public infrastructure improvements or other site improvements that will support development or rehabilitation of affordable units.

Goals for the number of households to be supported in 2016-2017 are provided below. The City expects to increase its CDBG investment in affordable housing in future program years.

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

Table 54 - 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 55 - One Year Goals for Affordable Housing by Support Type

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AP-60 Public Housing – 91.220(h)

Introduction

Commerce City residents are served by both the Adams County Housing Authority (ACHA) and the Commerce City Housing Authority (CCHA). ACHA 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. CCHA has an ownership interest in 226 affordable housing units throughout Commerce City and administers approximately 100 Housing Choice Vouchers.

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

Over the next year, the CCHA will endeavor to address the needs of subsidized and affordable housing in Commerce City by:

- Evaluating CCHA's properties to ensure efficient and effective use.
- Considering the involvement of residents in maintenance, management, and security strategies through an advisory group.
- Continue to examine possibilities to expand the voucher program to help address current unmet housing needs in Commerce City.
- Encourage efforts by the city's Neighborhood Services division to strengthen enforcement of affordable housing properties.

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

Over the coming year, the CCHA plans to take the following actions toward increasing the self-sufficiency and involvement of its residents:

1. Collaborate with partners to educate residents about home ownership and mortgage programs and practices.
2. Examine opportunities for CCHA to support existing residents to develop important skills and resources.
3. Meet with, and reach out to, residents and resident leaders to better understand and respond to needs and goals.
4. Support programs that encourage all residents to become active and involved within their community, including self-awareness of their surroundings and crime prevention.

The ACHA will continue its "peer navigator" program designed to offer in-home parenting classes and financial coaching that may give families living in poverty a chance to escape generational poverty.

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

The CCHA is not covered by a PHA Plan and is not subject to a HUD review or designation of this type. The ACHA is designated a "High Performer" based on its 2014 score report in the Public Housing Assessment System, with maximum scores for the agency's financials, management, and capital fund health. The following table provides a score breakdown by indicator:

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

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

Introduction

This section identifies actions Commerce City will take over the next year to address homelessness and other special needs. While the City will not fund any projects that specifically target homelessness in Year 1 of their 2016-2021 Consolidated Plan, it is considered a priority need to be addressed during this planning cycle. Over the next year, the City will explore opportunities to support Commerce City nonprofits providing housing and services for homeless persons and similar organizations operating in Adams County. Such opportunities may be funded, in part, using future CDBG grant monies.

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

The City will support efforts by local nonprofit organizations and by Adams County to provide outreach and case management services to assess individual needs and link them with appropriate services.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Commerce City will explore opportunities to partner with local nonprofit organizations to expand emergency and transitional housing for homeless persons. While these resources currently exist in the city, stakeholder input indicates that demand surpasses the availability of housing. Commerce City will also work with Adams County and surrounding municipalities to identify opportunities to address homelessness collaboratively.

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

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

The City of Commerce City will look for opportunities to partner with local service agencies to expand housing opportunities and services for homeless persons, including those making the transition to permanent housing.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-

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

In addition to identifying homelessness as a priority need, this Plan also identifies the need for additional affordable housing. The City of Commerce City and the Commerce City Housing Authority will continue to work with local partners to develop additional affordable housing units over the next five years. The City will also develop potential opportunities to support rapid rehousing and homelessness prevention efforts in conjunction with local housing and service providers, Adams County, and the Commerce City and Adams County Housing Authorities.

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

Introduction:

Housing affordability is a key issue affecting the entire Denver area, including Commerce City, and is driven primarily by supply and demand. Between 2014 and 2015, Denver's population grew by 2.7%, making it the fastest-growing of America's 50 largest cities.[5] During the same 2014-2015 span, Census data shows that Commerce City's population grew by 3.6% from 51,831 to 53,696. Despite this strong population growth, addition of new housing units has not kept pace, resulting in a relative scarcity of housing which has, in turn, driven up prices.

Based on Commerce City's average household size of 3.15 people, the city's 53,696 residents would require approximately 17,046 housing units, however, as of the Census's last count (2010-2014 ACS Estimates), the figure was 15,626, a shortfall of over 1,400 units or 9.0%. The shortage of available units was borne out in comments from Commerce City residents in public meetings and other settings. Residents frequently cited concern about rapidly increasing housing costs, reporting anecdotal examples of rents increasing 50% from one year to the next. Subsidized housing, especially apartments for seniors, seldom have vacancies and waiting lists for public housing and Housing Choice Vouchers in Commerce City are closed.

Adams County's 2015 Analysis of Impediments to Fair Housing Choice included a review of public policies and the effects of those policies on housing availability. That analysis concluded that neither local building codes, nor planning, permitting, or development review processes posed significant barriers to housing development in the County or in its cities. However, development-related costs (land costs, labor, materials, tap fees, impact fees, and the costs of assuaging NIMBY sentiments particularly directed at multifamily housing) were determined to have a significant negative effect on development of new housing.

Stakeholders interviewed in the course of preparing this plan also cited Colorado's construction defect laws as contributing to the lack of affordable multifamily housing supply. The well-intentioned state laws were designed to protect homebuyers from defective housing construction, but in allowing class action lawsuits from as few as two homeowners against a builder or other construction industry professional, the industry has all but stopped producing multifamily housing due to the high risk of litigation and the associated costs of insurance against such legal claims. Where multifamily housing is being constructed, it typically must exceed a $400,000 per unit price point in order to cover the builder's insurance costs.

[5] "Denver tops U.S. city population gain rate in 2015". The Denver Post, May 19, 2016. http://www.denverpost.com/2016/05/19/chart-denver-tops-u-s-city-population-gain-rate-in-2015/

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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

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

- **Rehabilitated Homes** (Citywide Policy HN 1.1)
  The preservation of existing housing stock (rental and ownership housing) and its rehabilitation helps prevent loss due to deterioration. It ensures that it will remain available to working families. Rehabilitated homes should be evaluated for environmental hazards. Identified hazards (e.g., lead-based paint, friable asbestos) will be mitigated before houses are re-occupied.

- **Variety of Housing Types and Mixed-Uses within Neighborhoods** (Citywide Policy HN 2.1)
  Encourage new neighborhoods that contain a mix of housing types, ranging from single-family detached, attached, townhomes, apartments, lofts, and housing for special needs (e.g., seniors). Site plans should include a mix of lot sizes, development densities, as well as housing types and styles, with high-density and multi-family housing near collector and arterial streets, transit, and services.

- **Neighborhoods for Mixed Incomes** (Citywide Policy HN 3.1)
  New neighborhoods should contain a range of housing priced at different points for mixed incomes, to achieve overall diversity.

- **Affordable Housing Options Maintained** (Citywide Policy HN 3.3)
  Continue to support existing affordable housing options, partnerships, and programs to address the continued maintenance of the city's affordable stock, including existing maintained mobile home parks in the Historic City; multi-family housing; and affordable, small, single-family homes. Future affordable housing will be located throughout the community near jobs and services, so that pockets of low-income housing do not occur.

Discussion:

Affordable Housing is one of Commerce City's three strategic housing-related goals appearing in the City's C3 Vision Plan. In addition to promoting a mix of housing types and price ranges the plan specifically calls for "housing that is affordable, not only to buy or rent but also that is cost-efficient and healthy to live in, is important to enable more residents to live near where they work to allow them to become economically self-sufficient." The plan prioritizes affordable housing that is accessible to transit.

Detailed strategies, goals, and outcome indicators for each of the affordable housing-focused policies listed above are contained in the City's C3 Vision Plan. Additionally, the Adams County 2015 Analysis of Impediments identifies three action steps being undertaken at a county level to combat development-

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related factors limiting affordable housing. These steps include general community education on the need for and importance of affordable housing, offering training for housing industry representatives on the benefits of building neighborhoods with diverse housing types, and maintaining a countywide inventory of potential multifamily development sites.

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AP-85 Other Actions – 91.220(k)

Introduction:

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

Actions planned to address obstacles to meeting underserved needs

To help remove obstacles to meeting underserved needs and improve service delivery, Commerce City will facilitate the development of regional social service collaborations to coordinate the work of social service organizations, disseminate news and information, spearhead community-wide solutions to local needs, and reduce service duplication across nonprofit agencies.

Actions planned to foster and maintain affordable housing

The City will help foster affordable housing with the federal resources that have been awarded. The City will use several strategies including:

- Provide future funding to support homeowner rehabilitation, repair, and weatherization programs.
- Seek programs and funding to reduce blighted housing units within the City, and through targeted redevelopment, increase the supply of affordable housing units.
- Participate in the Consolidated Plan development process to ensure coordination with broader community strategies.

Actions planned to reduce lead-based paint hazards

The City will make referrals as needed to the state health department for lead screenings and any properties proposed for rehabilitation will be screened for lead-based paint and property owners are provided with educational information.

Actions planned to reduce the number of poverty-level families

The City will continue its identification and development of areas with concentrated poverty, concentrated racial and ethnic poverty, and lower income families and continue to allocate entitlement funding there. As funding is available, the City will promote job training, employment services, and small business and micro enterprise development through partnerships with local colleges, chambers of commerce, incubators, and business development centers.

Actions planned to develop institutional structure

The development of social service collaborations across the region to coordinate the work of social service organizations, disseminate news and information, and spearhead community-wide solutions to local needs

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is necessary to assist the community in overcoming gaps in services and reduce service duplication for the homeless.

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

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

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Program Specific Requirements

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

Introduction:

The City will work diligently to ensure that its CDBG program adheres to the specific statutory and regulatory requirements set for the program. Commerce City is a new entitlement and begins this first program year with no program income on hand.

The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income over the one-year period covered by this 2016-2017 Action Plan is 80.00%.

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

Discussion:

Because Commerce City is a new entitlement, it begins this first program year with no program income on hand. The City has no outstanding Section 108 loan guarantees, grant funds returned to its line of credit, or float-funded activities. The City does not expect to receive surplus funds from urban renewal settlements. No CDBG funds are planned for urgent need activities. The City will ensure that the program-specific requirements for the CDBG program are satisfied and that policies and procedures are in place to maintain ongoing compliance.

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