



**City of Commerce City
2021-2025 Five-Year Consolidated Plan
2021 Year One Action Plan**

July 2021

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2021-2025 FIVE-YEAR CONSOLIDATED PLAN

For October 1, 2021 through September 30, 2026

2021 YEAR ONE ACTION PLAN

For October 1, 2021 to September 30, 2022

COMMERCE CITY, COLORADO

City of Commerce City
CDBG Program

July 2021

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2021-2025 Five-Year Consolidated Plan

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City of Commerce City 2021-2025 Five-Year Consolidated Plan

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Executive Summary

ES-05 Executive Summary - 24 CFR 91.200(C), 91.220(B)

1. Introduction

Every five years, the City of Commerce City must prepare a strategic plan (known as the Consolidated Plan) which governs the use of federal housing and community development grant funds that it receives from the United States Department of Housing and Urban Development (HUD). When preparing a Consolidated Plan, grantees must assess the needs and issues in their jurisdictions as a part of their preparation of these documents. The Consolidated Plan covers the grant funds that the City receives from HUD through the Community Development Block Grant (CDBG) Program.

The City must also submit to HUD separate Annual Action Plans for each of the five years during the Consolidated Plan period. The Annual Action Plans serve as the City's yearly applications to HUD that are required for the City to receive the annual allocations from the four grant programs. These grants from HUD are known as Entitlement Grant Programs because communities receive the funds every year if they meet program requirements and criteria associated with each of the four grants. Under HUD's grant program regulations, the City of Commerce City may use its CDBG grant funds only within the city limits.

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

When preparing a Consolidated Plan, grantees must assess the needs in their jurisdictions as a key part of the process. To inform the development of priorities and goals over the next five years, the Consolidated Plan's Needs Assessment discusses housing, community development, and economic development needs in the city. It relies on data from the US Census, 2011-2015 5-Year American Community Survey (ACS), and a special tabulation of ACS data known as Comprehensive Housing Affordability Strategy (CHAS) data that estimates the number of households with one or more housing needs. Local data regarding homelessness and assisted living is included. Finally, public input gathered through interviews, focus groups, public meetings, and the public project website are coupled with data analysis to identify priority needs related to affordable housing, homelessness, assisted housing, community development, public services, and economic development in Commerce City. Comments provided by attendees at the community meetings, and by residents and stakeholders who were interviewed are listed in the Citizen Participation portion of the report.

3. Evaluation of past performance

The City's most recent CAPER (2019-2020) reported on the City's performance relative to the previous Consolidated Plan's strategic goals. The City's five-year strategic goals established in the 2015-2020 Consolidated Plan are listed below along with accomplishments from the 2019-2020 program year (i.e., Year 4 of the five-year plan).

Under Commerce City's CDBG program:

- Sidewalk Construction and Repair: 5,650 persons assisted
- Local Bus Stop Improvements: Projects not yet completed
- Construction of ADA Ramps: 6 ramps constructed out of 10 expected
- Drainage Improvements: Projects not yet completed
- Job Training: Project not yet completed
- Revolving Loan Fund: 8 businesses assisted
- Business Development 140 persons assisted
- Demolition and Clearance: Project not yet completed
- Public Services: 380 persons assisted with public services and 154 persons assisted with homelessness prevention
- Minor Home Repair: 69 households/ housing units assisted
- Affirmatively Furthering Fair Housing Choice: 80 persons assisted

4. Summary of citizen participation process and consultation process

Virtual Community Input Sessions

The City held two virtual community input sessions from February through April 2021. Community input sessions were held on Thursday, February 18, at 10:30 AM, and Thursday, April 1, at 10:30 AM. Due to COVID-19, all input sessions were held online using the Zoom platform. Residents and stakeholders could join online or by phone. A Spanish interpreter was available during the sessions.

Project Website

The project website, InformC3.com, provided opportunities for residents and stakeholders to engage through tools in which they could share stories, brainstorm housing and community development ideas, show where opportunities exist on an interactive map of the city, and respond to a community-wide survey. The site had 297 visits from January 6 through April 9, 2021, and respondents provided 18 ideas, survey and poll responses, and map pins with comments about specific locations in the city.

Small Group Interviews and Focus Groups

The planning team extended invitations for in-depth small group interviews and focus groups to more than 150 residents and stakeholders representing a range of perspectives and local knowledge, including City staff; the City's Youth and Senior Commissions; the Commerce City Housing Authority Housing Board; organizations serving people experiencing and at risk of homelessness; civic and faith-based organizations; environment and emergency management stakeholders; broadband providers; healthcare and mental health service providers; transit providers; fair housing organizations; school districts; youth and family support organizations; affordable housing developers; economic and workforce development practitioners; organizations serving Latino residents and business owners; nonprofit organizations and service providers working with people with disabilities; and other local and regional stakeholders.

Public Comment Period

The City of Commerce City held a 30-day public comment period to receive comments on the draft 2021-2025 Consolidated Plan and 2021 Annual Action Plan beginning on May 25, 2021, and continuing through June 25, 2021. During this time, copies of the draft reports were made available for public review online at c3gov.com/CDBG and in hard copy at the Commerce City Civic Center located at 7887 E. 60th Avenue, Commerce City, CO 80022. Residents and stakeholders were encouraged to provide written comments via email, postal mail, or a comment form provided on the InformC3.com project site.

The City did not receive any comments during the public comment period.

5. Summary of public comments

Not applicable. No comments were received during the public comment period.

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

Not applicable. No comments were received during the public comment period.

7. Summary

During the development of the Consolidated Plan, the following priority needs were identified:

- Housing and Homelessness

- Public Services
- Economic Development
- Neighborhood Stabilization
- Public Infrastructure
- Emergency Response
- Administration and Planning

Entitlement grant resources totaling approximately \$431,414 are expected during the next fiscal year (July 1, 2021 – June 30, 2022) through the CDBG program and will be used by the city to address priority needs.

The Process

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

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 the administration of each grant program and funding source.

Table 1. Responsible Agencies

Agency Role	Name	Department/Agency
CDBG Administrator	Commerce City	Community Development Dept - CDBG Coordinator

Narrative

The City of Commerce City's Community Development Department is the lead agency responsible for developing the 2021-2025 Consolidated Plan and 2021 Annual Action Plan. These plans prioritize community development and affordable housing needs and establish goals for the use of HUD grant funding through the City of Commerce City's Community Development Block Grant (CDBG) program.

The Community Development Department also administers the CDBG program, including planning, implementation, coordination with partner organizations, monitoring project progress, and reporting on performance to the City Council and HUD.

The Consolidated Plan covers the period from October 1, 2021 through September 30, 2025, and identifies priority community development and housing needs and a strategy to address them. The attached Annual Action Plan discusses specific projects to be

funded during the 2021 program year, which begins October 1, 2021, and ends September 30, 2022.

In May of 2021, while this Consolidated Plan was being prepared, Commerce City's Council approved a resolution to join the Adams County HOME Consortium for a three-year term beginning with the 2022 program year. Although the consortium determines where it will invest its HOME funds and what happens to assets and program income resulting from HOME investments, the City's participation in the Consortium is expected to allow Commerce City to access an estimated \$150,000 per year in federal affordable housing resources. Adams County's Community & Economic Development division is the lead entity of the HOME Consortium and will administer the program. HOME funding strategies are determined in the development and adoption of the Adams County Consolidated Plan. In addition to Adams County, the cities of Thornton and Westminster are also participants in the Consortium.

Consolidated Plan Public Contact Information

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PR-10 Consultation – 91.100, 91.110, 91.200(B), 91.300(B),
91.215(I) AND 91.315(I)

Introduction

The City of Commerce City designed and promoted a range of opportunities for residents and stakeholders to shape the development of the 2021-2025 Five-Year Consolidated Plan and 2021 Annual Action Plan. To inform the plans' goals and priorities, the City engaged residents and stakeholders through two virtual community input sessions; 25 focus groups and small group interviews with residents and stakeholders working in housing, community, and economic development, and homelessness; and a project website that included tools through which residents and stakeholders could share stories, brainstorm ideas, show where opportunities exist on an interactive map of the city, and respond to a community-wide survey. Results of these outreach efforts are summarized in the Community Participation section of this Plan.

The City of Commerce City held a 30-day public comment period and a public hearing to receive input from residents and stakeholders on the draft Consolidated Plan and Annual Action Plan prior to approval by the City Council and submission to HUD.

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

In conducting its community engagement process, the City strove to engage with housing providers and health, mental health, and other service organizations and agencies. Stakeholders were invited to attend two public input sessions, participate in individual interviews or focus groups, and/or provide input on housing and community needs through the project website. Housing, health, mental health, and other service providers that participated in the planning process include Access Housing, Almost Home, Colorado Access, Colorado Consumer Health Initiative, Colorado Orthodontic Foundation, Kids First Health Care, Kids in Need of Dental (KIND), Let Your Light Shine, Mercy Housing, St. Vincent de Paul-Commerce City Chapter, Tri-County Health, Denver Regional Council of Governments, Adams County's Community and Economic Development, Commerce City Housing Authority, Maiker Housing, Catholic Charities, Salvation Army, Habitat for Humanity, Brother's Redevelopment, Rebuilding Together Metro Denver, Brothers Redevelopment, Metro Denver Homeless Initiative, PASCO (Personal Assistance Services of Colorado, A Precious Child, Salud Family Health Centers, and State of Colorado Office of Homeless Initiatives. The City in 2020 joined the Commerce City Services Alignment organization to assist in their efforts to coordinate family health care services and establish the Commerce City Community Campus which will serve as a hub for neighborhood wellness in the core city.

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

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

The City of Commerce City participates in the Metropolitan Denver Continuum of Care led by the Metro Denver Homeless Initiative. The Metro Denver Homeless Initiative is a

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

During the planning process for this Consolidated Plan, the City engaged with several organizations that serve residents who are homeless or at risk of homelessness to better understand the needs of the clients they serve. In particular, the planning team conducted small group interviews and focus groups with Access Housing, Almost Home, Let Your Light Shine, Commerce City Housing Authority, Maiker Housing, Catholic Charities, Salvation Army, Habitat for Humanity, Brother's Redevelopment, Rebuilding Together Metro Denver, Brothers Redevelopment the Metro Denver Homeless Initiative, A Precious Child, and the State of Colorado Office of Homeless Initiatives.

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

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

Commerce City does not receive an ESG entitlement grant. However, the City identified homeless housing and services as a potential priority during its 2021-2025 Consolidated Planning cycle and will consider projects that address homeless needs for CDBG funding.

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

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

Representative agencies, groups, and organizations that participated in the planning process for Commerce City's 2021-2025 Five-Year Consolidated Plan and 2021 Annual Action Plan are shown in Table 2. In addition to the agencies listed, others may have participated in the community survey, which was anonymous.



Exceptional efforts were made to consult as broad a group of community stakeholders as possible. The City of Commerce City and the planning team distributed invitations via e-mail for the small group interviews and focus groups to more than 150 contacts representing a variety of viewpoints, including city staff, elected officials, housing authority staff, housing developers, nonprofit organizations, homeless housing, and service providers, transit providers, health mental health service providers, agencies serving people with disabilities, family and senior service providers, youth organizations, economic development organizations, environment and energy stakeholders, broadband providers, and others. The City of Commerce City advertised community workshops and the project website on the City's website, social media, and City newsletters. Information about nonprofit grant applications and a link to the City's website and the CDBG grant application was provided to an estimated 5,000 subscribers through the City's listserv. No agency types were excluded from participation.

Table 2 – Agencies, Groups, Organizations who Participated

	Agency/Group/ Organization Name	Type	Section of Plan Addressed	Consultation Method
1	Access Housing	<ul style="list-style-type: none"> • Housing • Services-homeless 	<ul style="list-style-type: none"> • Housing need assessment • Homeless needs • Homelessness strategy 	<ul style="list-style-type: none"> • Partnership
2	Adams County Community and Economic Development Department	<ul style="list-style-type: none"> • Housing • Economic Development 	<ul style="list-style-type: none"> • Housing need assessment • Homeless needs • Homelessness strategy 	<ul style="list-style-type: none"> • Interview
3	Adelante Community Development	<ul style="list-style-type: none"> • Other- economic development 	<ul style="list-style-type: none"> • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview
4	Almost Home	<ul style="list-style-type: none"> • Housing • Services-homeless 	<ul style="list-style-type: none"> • Housing need assessment • Homeless needs • Homelessness strategy 	<ul style="list-style-type: none"> • Partnership • Focus group • Interview
5	Anythink Libraries	<ul style="list-style-type: none"> • Services- education • Other- library • Other- broadband 	<ul style="list-style-type: none"> • Non-housing community development strategy • Anti-poverty strategy 	<ul style="list-style-type: none"> • Focus group
6	Arapahoe County Weatherization Division	<ul style="list-style-type: none"> • Housing 	<ul style="list-style-type: none"> • Housing need assessment 	<ul style="list-style-type: none"> • Partnership
7	Audio Information Network Colorado	<ul style="list-style-type: none"> • Services – disabled 	<ul style="list-style-type: none"> • Non-housing community development strategy 	<ul style="list-style-type: none"> • Partnership
8	Suncor Boys and Girls Club Metro Denver	<ul style="list-style-type: none"> • Services – children 	<ul style="list-style-type: none"> • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview

Table 2 – Agencies, Groups, Organizations who Participated (continued)

Agency/Group/ Organization Name		Type	Section of Plan Addressed	Consultation Method
9	Brothers Redevelopment	<ul style="list-style-type: none"> Housing 	<ul style="list-style-type: none"> Housing need assessment Market analysis 	<ul style="list-style-type: none"> Partnership
10	Catholic Charities	<ul style="list-style-type: none"> Housing Services 	<ul style="list-style-type: none"> Homeless needs Homelessness strategy 	<ul style="list-style-type: none"> Interview
11	Colorado Access	<ul style="list-style-type: none"> Services-health 	<ul style="list-style-type: none"> Non-homeless special needs Non-housing community development strategy 	<ul style="list-style-type: none"> Interview
12	Colorado Consumer Health Initiative	<ul style="list-style-type: none"> Services-health 	<ul style="list-style-type: none"> Non-homeless special needs Non-housing community development strategy 	<ul style="list-style-type: none"> Interview
13	Colorado Orthodontic Foundation	<ul style="list-style-type: none"> Services – health 	<ul style="list-style-type: none"> Non-homeless special needs Non-housing community development strategy 	<ul style="list-style-type: none"> Interview
14	Commerce City Capital Improvement Program Citizen Advisory Committee	<ul style="list-style-type: none"> Other government-local 	<ul style="list-style-type: none"> Non-homeless special needs Non-housing community development strategy 	<ul style="list-style-type: none"> Interview
15	Commerce City City Council At-Large	<ul style="list-style-type: none"> Other government – local 	<ul style="list-style-type: none"> Housing need assessment Market analysis Non-housing community development strategy 	<ul style="list-style-type: none"> Interview
16	Commerce City Code Enforcement Division	<ul style="list-style-type: none"> Other government – local 	<ul style="list-style-type: none"> Housing need assessment Market analysis Non-housing community development strategy 	<ul style="list-style-type: none"> Partnership
17	Commerce City Community Liaison	<ul style="list-style-type: none"> Other government-local 	<ul style="list-style-type: none"> Non-housing community development strategy 	<ul style="list-style-type: none"> Focus group

Table 2 – Agencies, Groups, Organizations who Participated (continued)

	Agency/Group/ Organization Name	Type	Section of Plan Addressed	Consultation Method
18	Commerce City Economic Development Department	• Other government-local	• Non-housing community development strategy • Anti-poverty strategy	• Partnership
19	Commerce City Housing Authority Housing Board	• PHA	• Housing needs assessment • Public housing needs	• Partnership
20	Commerce City Parks, Recreation, and Golf Department	• Other government-local	• Non-housing community development strategy	• Partnership
21	Commerce City Planning Division	• Other government-local	• Housing need assessment • Market analysis • Non-housing community development	• Interview
22	Commerce City Police Department	• Other government-local	• Homeless needs • Homelessness strategy • Non-housing community development strategy	• Partnership
23	Commerce City Public Works Department	• Other government-local	• Non-housing community development strategy	• Interview
24	Commerce City Senior Commission	• Other government – local	• Housing need assessment • Non-housing community development strategy	• Focus group
25	Commerce City Services Alignment	• Services – health	• Non-housing community development strategy	• Meeting
26	Commerce City Youth Commission	• Other government – local	• Housing need assessment • Non-housing community development strategy	• Focus group
27	Cultivando	• Civic leaders	• Housing need assessment • Non-housing community development strategy	• Focus group

Table 2 – Agencies, Groups, Organizations who Participated (continued)

	Agency/Group/ Organization Name	Type	Section of Plan Addressed	Consultation Method
28	Denver Regional Council of Governments	<ul style="list-style-type: none"> Regional organization 	<ul style="list-style-type: none"> Housing need assessment Market analysis Non-housing community development strategy 	<ul style="list-style-type: none"> Focus group
29	Dominium Apartments	<ul style="list-style-type: none"> Housing 	<ul style="list-style-type: none"> Housing need assessment Market analysis 	<ul style="list-style-type: none"> Interview
30	Early Childhood Partnership of Adams County	<ul style="list-style-type: none"> Services – children 	<ul style="list-style-type: none"> Non-housing community development strategy Non-homeless special needs 	<ul style="list-style-type: none"> Focus group
31	Front Range Community College	<ul style="list-style-type: none"> Services- education 	<ul style="list-style-type: none"> Housing need assessment Non-homeless special needs Anti-poverty strategy Non-housing community development strategy 	<ul style="list-style-type: none"> Focus group
32	Groundwork Denver	<ul style="list-style-type: none"> Housing 	<ul style="list-style-type: none"> Rehabilitation 	<ul style="list-style-type: none"> Partnership
33	Habitat for Humanity	<ul style="list-style-type: none"> Housing 	<ul style="list-style-type: none"> Housing need assessment Market analysis 	<ul style="list-style-type: none"> Interview
34	Keller Williams	<ul style="list-style-type: none"> Housing 	<ul style="list-style-type: none"> Housing need assessment Market analysis 	<ul style="list-style-type: none"> Focus group
35	Kids First Health Care	<ul style="list-style-type: none"> Services – health 	<ul style="list-style-type: none"> Non-homeless special needs Non-housing community development strategy 	<ul style="list-style-type: none"> Interview
36	Kids in Need of Dental (KIND)	<ul style="list-style-type: none"> Services- health 	<ul style="list-style-type: none"> Non-homeless special needs Non-housing community development strategy 	<ul style="list-style-type: none"> Partnership

Table 2 – Agencies, Groups, Organizations who Participated (continued)

Agency/Group/ Organization Name		Type	Section of Plan Addressed	Consultation Method
37	Let Your Light Shine	<ul style="list-style-type: none"> • Services- homeless 	<ul style="list-style-type: none"> • Homeless needs • Homelessness strategy • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview
38	Maiker Housing	<ul style="list-style-type: none"> • Housing 	<ul style="list-style-type: none"> • Housing need assessment 	<ul style="list-style-type: none"> • Interview
39	Mercy Housing	<ul style="list-style-type: none"> • Housing 	<ul style="list-style-type: none"> • Housing need assessment • Market analysis • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview
40	Metro Denver Homeless Initiative	<ul style="list-style-type: none"> • Services- homeless 	<ul style="list-style-type: none"> • Homeless needs • Homelessness strategy • Housing need assessment • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview
41	Neurodiversity Works	<ul style="list-style-type: none"> • Services- education 	<ul style="list-style-type: none"> • Non-homeless special needs • Non-housing community development strategy 	<ul style="list-style-type: none"> • Community meeting
42	North Metro Small Business Development Center	<ul style="list-style-type: none"> • Services- economic development 	<ul style="list-style-type: none"> • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview
43	PASCO (Personal Assistance Services of Colorado)	<ul style="list-style-type: none"> • Services- persons with disabilities 	<ul style="list-style-type: none"> • Non-homeless special needs • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview
44	PCs for People	<ul style="list-style-type: none"> • Services- health • Other- broadband 	<ul style="list-style-type: none"> • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview
45	A Precious Child	<ul style="list-style-type: none"> • Services- children 	<ul style="list-style-type: none"> • Housing need assessment • Homeless needs • Homelessness strategy • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview

Table 2 – Agencies, Groups, Organizations who Participated (continued)

Agency/Group/ Organization Name		Type	Section of Plan Addressed	Consultation Method
46	Saint Vincent de Paul	<ul style="list-style-type: none"> • Services-homeless 	<ul style="list-style-type: none"> • Homeless needs • Homelessness strategy 	<ul style="list-style-type: none"> • Interview
47	Salud Family Health Centers	<ul style="list-style-type: none"> • Services- health 	<ul style="list-style-type: none"> • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview
48	Salvation Army	<ul style="list-style-type: none"> • Housing • Services - homeless 	<ul style="list-style-type: none"> • Homeless needs • Homelessness strategy 	<ul style="list-style-type: none"> • Interview
49	South Adams County Water and Sanitation District	<ul style="list-style-type: none"> • Other government-local 	<ul style="list-style-type: none"> • Housing need assessment • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview
50	State of Colorado Office of Homeless Initiatives	<ul style="list-style-type: none"> • Other government-state 	<ul style="list-style-type: none"> • Homeless needs • Homelessness strategy • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview
51	Tri-County Health Department	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Services- health 	<ul style="list-style-type: none"> • Meeting
52	United Power	<ul style="list-style-type: none"> • Other- energy provider 	<ul style="list-style-type: none"> • Housing need assessment • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview
53	Xcel Energy	<ul style="list-style-type: none"> • Other- energy provider 	<ul style="list-style-type: none"> • Housing need assessment • Non-housing community development strategy 	<ul style="list-style-type: none"> • Interview

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

Table 3. Other local / regional / federal planning efforts

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
City of Commerce City C3 Vision Comprehensive Plan (2010)	City of Commerce City	<p>Goals of the Comprehensive Plan that overlap with the goals of the Strategic Plan include:</p> <ul style="list-style-type: none"> • Reinvest in and rehabilitate aging housing stock • Increase housing types to meet current and future needs • Increase the range of housing prices • Ensure neighborhood accessibility to all modes of travel • Strengthen existing neighborhoods through reinvestment and assistance with renewal efforts • Promote regular physical activity by providing safe, convenient opportunities for recreation and human-powered travel • Improve access to health care facilities, programs, and human services • Encourage increased access to healthy foods for all residents • Build and maintain parks to enhance neighborhoods and meet current and future generation needs • Increase year-round active recreation opportunities • Increase educational options for life-long learning
Economic Development Strategic Plan (2010)	City of Commerce City	<p>Goals of the Economic Development Strategic Plan that overlap with goals of the strategic plan include:</p> <ul style="list-style-type: none"> • Conduct in-depth research to determine occupations and skill sets most in demand by the targeted industries. • Ensure that employer feedback about workforce strengths and weaknesses is periodically gathered through City-employer programs and communicated to area workforce development providers. • Elevate high school graduation rates and technical training among area residents. • Increase local employer understanding and utilization of workforce development programs.
Walk.Bike.Fit Commerce City (2012)	City of Commerce City	<p>Goals of the Walk.Bike.Fit plan that overlap with goals of the Strategic Plan include:</p> <ul style="list-style-type: none"> • As recommended in the current Parks and Recreation Master Plans and other documents, create a system of outdoor civic spaces that are destinations for active travel.
City of Commerce City Housing Needs Assessment (2018)	City of Commerce City	<p>The Housing Needs Assessment notes several housing issues in Commerce City, including a housing affordability gap, lack of diversity in the city's housing stock, and a growing homeless population.</p>

<p>Commerce City Balanced Housing Plan and Commerce City Housing Authority Affordable Housing Implementation Plan (2018/2019)</p>	<p>City of Commerce City and Commerce City Housing Authority</p>	<p>Goals of the Balanced Housing Plan and Commerce City Housing Authority Affordable Housing Implementation Plan that overlap with goals of the Strategic Plan include:</p> <ul style="list-style-type: none"> • Explore policies for creative housing solutions • Explore options to fund housing development • Develop special needs housing units
<p>Commerce City Station Area Master Plan</p>	<p>RTD Denver</p>	<p>Goal of building multi-use facilities and affordable housing near the new N Line Rapid Transit District's new station at 72nd and Colorado Blvd.</p> <p>Goal of improved connectivity through the City to the new N Line Rapid Transit District's new station at 72nd and Colorado Blvd.</p>
<p>2020 Analysis of Impediments to Fair Housing Choice for Adams County</p>	<p>Adams County</p>	<p>Goals of the 2020 Analysis of Impediments to Fair Housing Choice in Adams County that overlap with goals of the Strategic Plan include:</p> <ul style="list-style-type: none"> • Collaborate regionally to develop resources and training for financial literacy, focused specifically on disproportionate impacts and housing challenges identified in this AI • Investigate funding sources to provide grants for home improvement, specifically to groups with high rates of denials for home improvement loans. • Continue participation in the Metro Down payment Assistance program and consider affirmatively marketing to protected classes that are underrepresented in homeownership. • Expand resources for the development of affordable housing in the county. • Inventory public land and other resources that may contribute to attracting or constructing affordable housing in the county. • Carry forward response and recovery efforts related to the impacts of the COVID-19 pandemic. • Expand internet access in the county, specifically for low-income households. Access to opportunity including employment, quality education, and health care depends heavily on strong internet access throughout the COVID-19 pandemic.

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))

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

PR-15 Citizen Participation – 91.105, 91.115, 91.200(C) AND 91.300(C)

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

Summarize citizen participation process and how it impacted goal-setting

Community engagement for the Consolidated Plan took place from January through April 2021. The City of Commerce City invited residents and stakeholders to provide input for this Consolidated Plan by attending virtual community workshops, focus groups, interviews, and by participating through the project website. In addition to the workshops and website, the planning team conducted in-depth small group interviews and focus groups with key stakeholders and groups representing a variety of viewpoints relevant to the development of the Consolidated Plan.

The City held two virtual community input sessions from February through April 2021. Community input sessions were held on Thursday, February 18, at 10:30 AM, and Thursday, April 1, at 10:30 AM. Due to COVID-19, all input sessions were held online using the Zoom platform. Residents and stakeholders could join online or by phone.

The City established a new website to gather input specifically for the Consolidated Plan at InformC3.com. The project website provided opportunities for residents and stakeholders to engage through tools in which they could share stories, brainstorm housing and community development ideas, show where opportunities exist on an interactive map of the city, and respond to a community-wide survey. The site had 297 visits from January 6 through April 9, 2021, and respondents provided 18 ideas, survey and poll responses, and map pins with comments about specific locations in the city.

Information about the planning process for the 2021-2025 Consolidated Plan and 2021 Annual Action Plan was also provided on the City's CDBG webpage.

Advertisements for the workshops and website targeted the general public, as well as nonprofits, service providers, housing providers, and others working with low- and moderate-income households and special needs populations. Notice was given to

residents through multiple posts on the City's social media (Facebook and Twitter), the City of Commerce City website, and the City's monthly, bilingual newsletter, which is delivered to every household in the city.

In addition to the community input sessions and survey, the planning team extended invitations for in-depth small group interviews and focus groups to more than 160 residents and stakeholders representing a range of perspectives and local knowledge, including City staff; the City's Youth, and Senior Commissions; the Commerce City Housing Authority Housing Board; organizations serving people experiencing and at risk of homelessness; civic and faith-based organizations; environment and emergency management stakeholders; broadband providers; healthcare and mental health service providers; transit providers; fair housing organizations; school districts; youth and family support organizations; affordable housing developers; economic and workforce development practitioners; organizations serving Latino residents and business owners; nonprofit organizations and service providers working with people with disabilities; and other local and regional stakeholders. The City held 25 focus groups and small group interviews. Representatives from 46 community organizations, agencies, and institutions participated in the development of the Consolidated Plan through small group interviews, focus groups, and community meetings.

The City of Commerce City held a 30-day public comment period to receive comments on the draft 2021-2025 Consolidated Plan and 2021 Annual Action Plan beginning on May 25, 2021, and continuing through June 25, 2021. During this time, copies of the draft reports were made available for public review online at c3gov.com/CDBG and in hard copy at the Commerce City Civic Center located at 7887 E. 60th Avenue, Commerce City, CO 80022. Residents and stakeholders were encouraged to provide written comments via email, postal mail, or a comment form provided on the InformC3.com project site. The City did not receive any comments during the public comment period.

The City of Commerce City also held a public hearing to discuss key findings and receive input from residents and stakeholders on the draft plans. A summary of community outreach efforts and responses is contained in the table that follows, with additional details and evidence of outreach materials available as an appendix.

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
1	Community Workshop #1	<ul style="list-style-type: none"> Residents, including minority residents, people with limited English proficiency, people with disabilities, and public/ assisted housing residents Housing and service providers Community development practitioners 	2 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Resource Navigator and/or resource directory Opportunities for youth to access resources Access to healthy food including community gardens Access to healthcare resources - a holistic approach targeted to focus on the patient-client experience Need to be able to flexibly support families in the way they specifically need Transportation to needed services and locations Planning efforts that empower community voice Bilingual and undocumented resident assistance COVID's impacts children's mental health Childcare and senior care Public services including youth programs, basic family supplies, life skill education, Park development Multi-use space/building <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Short-term help with rent/ mortgage and utilities - seeing a lot more displacement of families during COVID Affordable housing supply and availability Seeing a lot of multigenerational homes, issues of overcrowding, don't have enough in the fridge, difficulties having all the kids log in for school <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> Prevention Public Services

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
2	Community Workshop #2	<ul style="list-style-type: none"> Residents, including minority residents, people with limited English proficiency, people with disabilities, and public/ assisted housing residents Housing and service providers Community development practitioners 	5 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Resource Navigator and/or resource directory Increase in individuals with neurodiversity needs. Education for workforce development, programming in conjunction with school districts The CDBG-funded programs offered by the City are magnificent. Consider synergies between projects up for considerations (e.g., GRID Alternatives + Neurodiversity Works) Minor Home Repair Program, weatherization, and GRID Alternatives are top priorities. Other needs include addressing drainage and flooding issues Water scarcity and balancing resources with anticipated population growth Technology training and broadband availability Adaptive recreation center and aquatic programming for special populations Family assistance including childcare, senior care, youth programming, health, and medical services Underdeveloped parks Multi-use public space/building <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Affordable housing supply and availability Gentrification prevention <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> Prevention Public Services

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
3	Project Website	<ul style="list-style-type: none"> Residents, including minority residents, people with limited English proficiency, people with disabilities, and public/ assisted housing residents Housing and service providers Community development practitioners 	9 registrants, 297 site visits	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Childcare Health and mental health services Homeless centers Support for nonprofits, specifically those applying a multi-generational approach to supporting the community. Commerce City Community Campus (C4) Wellness Hub Community and Resource Navigation Trailhead/access for the Sand Creek Greenway Sidewalks and/or bike lanes along 60th to access the Sand Creek Greenway from the shops at 60th & Vasquez More Wayfinding signage from the neighborhood's east of Colorado Blvd to the N Line Station at 72nd Sand Creek Greenway trail access here (shown on map) from Vasquez Blvd - where people have already created a dirt trail from accessing the trail here Pedestrian Bridge here (shown on map) for residents to access the Sand Creek Greenway and Wetland Park without needing to deal with the conditions at Vasquez & 56th Ave to access the Greenway <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Short-term help with rental or mortgage payments Construction of new affordable rental units Rehabilitation of affordable rental housing/ apartments <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> Access to homeless shelters Housing with on-site supportive services/ case management

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
4	Cultivando Focus Group	<ul style="list-style-type: none"> Hispanic/ Latino residents 	15 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Support for people who are homeless- a place where people can stay and take care of their personal needs; program or place where they can hang out, go to class, help others. Resources for seniors Funding for heating programs Youth employment programs; programs to support the school system; partnership with high school to increase vocational opportunities; sports programs Create more parks, not just drainage parks but useable greenspaces Employment opportunities for immigrants in Commerce City Transportation assistance <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Rental assistance, including for undocumented residents Neighborhood revitalization- trees, landscaping, Improve homes

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
5	Youth Commission Focus Group	<ul style="list-style-type: none"> Youth residents 	2 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Post-secondary education- job training, higher education, skills, and trades Infrastructure- especially in the core city, where it's not new A resource center- when Adams County took their services, it left a huge void in Commerce City Youth activities- a youth hangout place and activities that they could go to after school, a youth gathering Training involving how to survive in the real world <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Affordable housing First-time homebuyer assistance, refinancing Home repair for seniors and people with disabilities who have fixed incomes Weatherization, Paint-a-Thon, and rent/mortgage assistance have been successful programs <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> Homelessness prevention

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
6	CommerCITY Housing Authority Housing Board Focus Group	<ul style="list-style-type: none"> • CCHA Housing Board members 	10 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> • Childcare • Transportation • Education and training • Internet access <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> • Tiny homes, alternative housing, and transitional housing • Housing for people with disabilities • First-time homebuyers' assistance grants • Housing for people who are homeless, including transitional housing for homeless men • Inclusive affordable housing that doesn't turn away people with evictions • Inspections for rental units
7	Seniors/ Active Adults Focus Group	<ul style="list-style-type: none"> • Senior residents 	11 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> • Community navigator to connect people with services and transportation • Resources that aren't technology based • Assistance with technology • Services at Bison Ridge • Transportation for seniors • Benches, sidewalks, ADA accessibility <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> • Housing that is affordable and accessible for seniors • Accessibility improvements to housing <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> • Tiny homes; shortage of affordable housing

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
8	Almost Home Focus Group	<ul style="list-style-type: none"> Residents participating in Almost Home programs 	1 participant	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Job training Affordable childcare <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Affordable rental housing Rental assistance <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> Immediate emergency housing, particularly for single mothers
9	Civic Organizations Focus Group	<ul style="list-style-type: none"> Civic organization stakeholders 	4 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Child neglect due to poverty Increase literacy Address food insecurity Community gathering place Sidewalks and walkability in south Commerce City Small business assistance (branding, workforce development etc.) Bilingual and culturally meaningful services/ supports Use undeveloped lots for parks <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Housing rehab and repair programs Affordability is an issue- proximity to Denver and people being priced out of the housing markets <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> Places to eat, shower, do laundry

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
10	Faith-Based Organizations Focus Group	<ul style="list-style-type: none"> Faith-based organization stakeholders 	1 participant	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Domestic violence services- encouraging people to reach out to assistance locations and advocates (could include bus passes, Uber/ Lyft) Food assistance Transportation is a barrier to getting food (Uber/ Lyft, bus passes) Support for mental health and substance abuse issues during COVID <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Rental assistance <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> Mobile outreach to people experiencing homelessness and people who are doubled or tripled up Building relationships with people in crisis Meeting immediate needs and planning for next steps Hotel vouchers Clothing- clean socks, underwear Showers Rapid rehousing programs are working well

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
11	Planning and Parks, Recreation, and Golf Departments Small Group Interview	City staff- Planning and Parks, Recreation, and Golf	7 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> • Youth activities- facilities for competitive sports • Access to recreation- publicizing/ outreach to promote awareness of programs • Vocational tech partner for parks projects • Infrastructure updates, underground power lines, lighting, signage, wayfinding in Derby redevelopment area • Supporting businesses in Derby/ understanding their needs • Pedestrian/ vehicle improvements to new RTC Train Station along Colorado Blvd.- pedestrian bridge called for in the plan • Neighborhood cleanups • Irondale infrastructure partnerships • Programs for older adults/ understanding their interests and needs • Park signage and wayfinding throughout the city • Upgrades to existing pedestrian tunnels • Continue programming and outreach with Cultivando • Partnering with organizations providing therapeutic recreation • Dual language book program for learning English and Spanish <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> • First-time homebuyer assistance • More multifamily housing • Housing for aging in place • Repairing older homes in Rose Hill, Old Town South • Senior housing and activities- active and assisted living developments <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> • Funding to implement homelessness programs and provide services through new PRG staff person • A homeless shelter in Adams County • Safe places for people to camp and park with transportation available

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
12	Homelessness Stakeholders Small Group Interview	<ul style="list-style-type: none"> Homelessness service providers 	4 participants	<p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Emergency assistance/ homelessness prevention (lack of shelter capacity) Trauma-informed design Gap funding for housing specific populations (e.g., youth aged 18-24) Source of income protection <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> Housing vouchers for youth transitioning out of foster care Funding for pet deposits, first month's rent, moving costs, landlord issues to get people into housing Case management for preventing homelessness long-term

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
13	Environment and Emergency Management Stakeholders Small Group Interview	<ul style="list-style-type: none"> Environment and emergency management stakeholders 	4 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Resiliency center where residents could go during power outages, storms, and flooding Backup generators for rec centers Low-income solar garden Transportation connections to downtown and employment; improving access to the new rail center Natural plantings around infrastructure; artwork around traffic control boxes Carbon monoxide detector giveaways Outdoor warning towers <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Partner with utility for energy efficiency upgrades Programmable thermostats have been successful, but Wi-Fi access is a barrier Wi-Fi access and connecting people with information through apps Rent and utility assistance Public service flyers in goodie bags to increase awareness about resources <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> Homeless encampment cleanups Staff dedicated to dealing with homelessness
14	Broadband Providers Small Group Interview	<ul style="list-style-type: none"> Broadband providers 	1 participant	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Information about high-quality internet options Providing access to the internet: 20-40% of residents do not have internet Awareness of how retired electronic devices can be put back in use through community centers and other nonprofits Digital education

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
15	Medical and Mental Health Providers Small Group Interview	<ul style="list-style-type: none"> Healthcare providers 	6 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Transportation gaps in accessing healthcare Bus stops, lighting, and infrastructure to reduce isolation Client-centric health services; comprehensive care that is in one place and coordinated Awareness of resources available Greeter and care coordinator positions in C4 wellness hub Hub where workers can go to get medical, dental, equipment, home health, with shared staff welcoming and guiding residents HEPA air filters and increased accessibility for health hub
16	Public Works Department Small Group Interview	<ul style="list-style-type: none"> City staff- Public Works 	1 participant	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Street lighting, sidewalks, landscaping, beautification Making areas for walkable and bikeable Median beautification (Rosemary and 88th) Pocket parks Historic marker for the historic bridge being replaced Shading/tree canopy on multiuse trails Funding for new taps for businesses in Derby Purchase land in Irondale to facilitate drainage

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
17	Neighborhood Services and Police Department Small Group Interview	<ul style="list-style-type: none"> • City staff- Neighborhood Services and Police Department 	3 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> • Snow removal for seniors and people with disabilities • Citizen police academy • Community engagement staff for the police department • Resource promotion and assistance • Domestic violence services • Childcare services • Code enforcement • Transportation and access to a phone for victims • Full-time City staff to help with access to resources <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> • Rental assistance to prevent eviction <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> • Homelessness prevention for domestic violence victims

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
18	Transit Providers Small Group Interview	<ul style="list-style-type: none"> • Transit providers 	3 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> • Access to different transportation options and resources • Wayfinding for getting to Sand Creek Greenway and the new N-Line station • Increasing safety for cyclists and pedestrians • HAWK or similar signals • Subsidized transportation to the N-Line station (e.g., bus tickets) • Vision Zero priorities: Street lighting, painted bollards, traffic calming measures, public art • Promoting awareness of existing transportation resources • Local bike share that doesn't require a credit card or smartphone • First/last mile options • Rideshare programs for seniors • Electric vehicle charging stations; eBike charging • Street furniture • Bike tours to transit connection opportunities to increase confidence • Wayfinding audit <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> • Affordable housing near transit

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
19	Senior Organizations Small Group Interview	<ul style="list-style-type: none"> Senior organizations 	7 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Resource navigator to meet one-on-one and connect people with resources Educate seniors to serve as resource navigators One-on-one, hands-on technology training for seniors Promoting scholarship programs for seniors to access technology training Pay-what-you-can programs; applications are a barrier <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Affordable housing Accessible housing Helping older adults afford home repairs Addressing hoarding Supporting seniors in aging in place Home modification <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> Services for people experiencing homelessness Mental health professionals and drug rehabilitation services Workforce development Housing Homelessness prevention Allowing camping in ways that are safe for the community

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
20	Youth/ Family Support and School Districts Small Group Interview	<ul style="list-style-type: none"> Youth and family support organizations and school district liaisons 	3 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Food banks Information in multiple languages School supplies Low-cost internet Information about where to go for resources User-friendly basic financial literacy training, including in Spanish <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Rent and utility assistance, including for undocumented residents Assistance filling out housing and utility assistance applications <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> Domestic violence shelters, including services for undocumented residents Grants for motel vouchers Case management services Base plans on engagement with organizations and service providers

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
21	Affordable Housing Developers and Colorado Housing and Finance Authority Small Group Interview	<ul style="list-style-type: none"> Affordable housing developers and CHFA 	5 participants	<p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Senior housing; affordable independent living Affordable multifamily rental housing that is affordable at 40-50% AMI Deeper set-asides for multifamily projects Housing for people with disabilities 1-bedroom units ADA modifications Funding for home rehabilitation loans Fast-tracking; expedited plan review; stability in the inspection program Regional water softening system Managing stereotypes about affordable housing Encourage multifamily development in DDA/QCT areas CHFA more likely to make an award if the City will assign PAB bonds over to CHFA Layering historic tax credits on top of LIHTC

22	Latino Community Organizations Small Group Interview	Latino community organizations	2 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> • Youth activities • Expanding inclusivity of playgrounds • Youth café- a safe space for youth to hang out and have mentors; could be combined with a larger resource center • Getting youth involved with local organizations; hang out with seniors • A way for seniors and youth to come together to teach each other • More bilingual City staff • Community navigator to guide people to services and resources • Food assistance; diapers • Yearly assessment of people in need to understand their needs • Addressing safety issues for pedestrian mobility • Asset-based approach <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> • Affordable housing • Rental and utility assistance through the City/nonprofit partnership • Housing navigator at C4 wellness hub • Developers partner with school homeless liaisons to understand needs • More equitable way of distributing vouchers • Weatherization to improve air quality • Education on water quality <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> • Homeless shelters • Case management unit with law enforcement, mental health, and a resource navigator • Eliminate waiting lists for housing; make homelessness a priority • Apartment complexes with space for residents to receive help; prioritizing Commerce City residents • Tiny home village with a community center for accessing resources
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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
23	Business and Economic Development Small Group Interview	<ul style="list-style-type: none"> Business and economic development stakeholders 	2 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> • Opportunity to invite food trucks into parks; food truck festival • Program for street vendors, ice cream carts, etc. • Welcoming entrepreneurs into the community; informing the community about the vendors • Teaching vendors best business practices • Open up opportunities to flea market vendors • Culinary arts programs through City and school system- pop-up truck vendors • Lighting and surveillance in Derby • Gardens • Programs like Derby Days to celebrate the business community • Continue business resource center • Office of economic empowerment to help small businesses and families • Helping businesses ramp back up after COVID • Maintain partnerships formed through recovery grants • Collect businesses' stories about how they have succeeded, recovered • Help moving curriculum modules online- video resources in English and Spanish <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> • Support from Cultivando for health and wellness aspects of homelessness • Help small business owners with protocols around homelessness • Surveillance system • Address urban camping • Homeless navigator • Safe parking with designated areas for people living out of their vehicles

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
24	Workforce Development Interviews	<ul style="list-style-type: none"> AmeriCorps and Construction Careers Now! 	3 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Resource availability and coordination Veteran's assistance to workforce Education – job training and higher education Employment and business recovery from the pandemic Small business assistance and start-ups Bilingual and undocumented assistance for job seekers and training Technology training Preparing the workforce for the upcoming I-270 expansion <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Assistance for veterans

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
25	Rent, Mortgage, and Utility Assistance Interviews	<ul style="list-style-type: none"> • Maiker Housing • Catholic Charities • Salvation Army • Almost Home • Access Housing • Growing Home • St Vincent de Paul • Volunteers of America • Colorado AIDS Project 	9 participants, one at each interview	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> • Neighborhood improvements including accessibility, safety, and parks • Community navigators to guide people to services and resources • Assisting the undocumented <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> • Great shortage of affordable housing including middle housing • Rental, mortgage, and utility assistance through public and private partnerships • Avoiding foreclosures and evictions due to COVID • Small amount of utility funding assistance • Tracking non-homelessness assistance • Private financing difficulties • Veteran's housing • ADA accessible housing and surrounding facilities • Start laws restricting developers in constructing townhouses and condominiums • No more grant restrictions and funding duration and amount • Budgeting, home management, and other life skills education • Housing stabilization planning with follow-up • Senior housing; safe and affordable independent living • Creative partnerships and funding packages for affordable housing <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> • Homeless shelters • Basic survival needs • Working with school district homeless liaisons to understand needs • Case management unit with law enforcement, mental health, and a resource navigator • Transitioning veterans out of homelessness • Tiny home/van village with a community center for accessing resources

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
26	New Housing Interview	<ul style="list-style-type: none"> Habitat for Humanity of Denver 	3 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> Assisting the undocumented <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> Extremely high cost of tap fees in Commerce City, one of Colorado's highest Lack of affordable lots Difficulty if residents finding private financing Shortage of ADA accessible housing Excessive grant restrictions by the federal government Budgeting, home management, and other life skills education Creative partnerships and funding packages for affordable housing <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> Homeless shelters Basic survival needs Case management Alternative housing solutions Rapid rehousing
27	Family Assistance Interviews	<ul style="list-style-type: none"> Joyful Journey A Precious Child 	2 participants	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
28	Housing Rehabilitation Interviews	<ul style="list-style-type: none"> • BRI • Rebuilding Together • Arapahoe County Weatherization Division • Groundwork Denver 	6 participants	<p><u>Greatest Community Needs</u></p> <ul style="list-style-type: none"> • Resource directory in printed and electronic forms • Resource navigation and case management • Neighborhood improvements in facilities, transportation, and accessibility • Neighborhood safety and navigability • A shortage of trained, licensed, and certified technicians and subcontractors <p><u>Greatest Housing Needs</u></p> <ul style="list-style-type: none"> • Aging homes need repair • Bringing homes up to code • Reducing the current delays in work inspections by the city • Seniors want to stay in their homes • Making homes accessible • Reducing utility costs through energy efficiency improvements and appliances • Shortage of ADA accessible housing • Shortage of affordable housing going both up the ladder and down the ladder in size and cost • Case management for at risk homeowners • Budgeting, home management, and other life skills education <p><u>Greatest Homelessness Needs</u></p> <ul style="list-style-type: none"> • Emergency shelter; Rapid rehousing • Basic supplies and services • Alternative housing solutions



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
29	30-Day Public Comment Period	<ul style="list-style-type: none"> • Residents, including minority residents, people with limited English proficiency, people with disabilities, and public/ assisted housing residents • Housing and service providers • Community development practitioners 	No comments received	No comments received



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received
30	Public Hearing	<ul style="list-style-type: none"> • Residents, including minority residents, people with limited English proficiency, people with disabilities, and public/ assisted housing residents • Housing and service providers • Community development practitioners 	TBD	TBD

Needs Assessment

NA-05 Overview

This section of the Consolidated Plan discusses housing, community development, and economic development needs in Commerce City to provide the information to determine the priority needs and goals for CDBG activities over the next five years. It relies on data from the U.S. Census, the 2015-2019 5-Year American Community Survey (ACS), and a special tabulation of ACS data known as Comprehensive Housing Affordability Strategy (CHAS) data that estimates the number of households with one or more housing needs. Local data regarding homelessness and assisted housing is included. Finally, public input gathered through the project's website, public meetings, stakeholder focus groups, community workshops, and interviews are coupled with data analysis to identify priority needs related to affordable housing, homelessness, public services, community development, and economic development in Commerce City.

NA-10 Housing Needs Assessment - 24 CFR 91.205 (A,B,C)

According to the 2015-2019 5-Year American Community Survey, there are 56,448 residents in Commerce City living in 16,332 households. Commerce City's population increased by 16% between 2014 and 2019. The number of households also increased by 12% during this period, from 14,581 to 16,332. The city's median household income has also increased by 19% between 2014 and 2019 from an estimated \$64,672 to \$77,065.

Table 4 segments households by income and household type, including small families (2-4 members), large families (5 or more members), households with seniors, and households with small children (age 6 and under). As shown, 6,250 households in Commerce City have low or moderate incomes (under 80% of HUD Adjusted Median Family Income (HAMFI)). Together, low-to-moderate income households constitute 38% of all households in the city. Households containing one or more residents over the age of 75 are the most likely to be low to moderate-income. Approximately 60% of households with a resident over 75 are low to moderate-income. A significant share are large families (51%) and families with small children (48%) also have low to moderate incomes. Households with a resident aged 62-74 and small families are the least likely to be low to moderate-income (affecting 41% and 34% of these households respectively).

For many low- and moderate-income households in Commerce City, finding and maintaining suitable housing at an affordable cost is a challenge. Tables 5 through 10 identify housing needs by tenure based on Comprehensive Housing Affordability Strategy

(CHAS) data. CHAS data is a special tabulation of 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 number of households that fit certain combinations of HUD-specified housing needs, HUD-defined income limits (primarily 30, 50, and 80% of HAMFI), and household types of particular interest to planners and policy makers.

To assess affordability and other types of housing needs, HUD defines four housing problems:

1. **Cost burden:** A household has a cost burden if its monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
2. **Overcrowding:** A household is overcrowded if there is more than 1 person per room, not including kitchens and bathrooms.
3. **Lack of complete kitchen facilities:** A household lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, refrigerator, or a sink with piped water.
4. **Lack of complete plumbing facilities:** A household lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly household income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (as described above).

Table 5 indicates that a total of 5,100 households, or 31% of all Commerce City households, have at least one housing problem. Data for households experiencing severe housing problems (provided in Table 6) indicates that 2,450 households, or 15% of all Commerce City households, experience a severe housing problem.

Overall, the most common housing problem in Commerce City is the cost burden for both renters and homeowners. Twenty-eight percent of the city's low-to-moderate income households (2,565 households) are cost-burdened, spending between 30% and 50% of

their monthly income on housing costs. Table 7 indicates that small, related households are most likely to be cost-burdened. The city's 900 small, related households make up 46% of the city's cost-burdened, low to moderate-income households. Small, large, and elderly families are more likely to be cost-burdened as homeowners than as renters. Other family types, including single persons, are more likely to be cost-burdened as renters than homeowners.

Looking at severe cost burdens - in which a household spends more than 50% of their monthly income on housing costs – around one-fifth (22%) of low-income renter and homeowner households (1,883 households) are affected by this housing problem. Table 8 indicates that small families make up the largest percentage of severely cost-burdened households (46%). Small families and elderly homeowners are more likely to be severely cost-burdened than small families or elderly persons who are renters. Conversely, severe cost burdens affect more large families and other renters than homeowners from these groups.

While the primary housing issue facing low-to-moderate income residents is related to affordability, CHAS data also examines overcrowding and lack of complete plumbing and kitchen facilities. Table 9 indicates that overcrowding affects a total of 655 households in Commerce City. Most of the city's overcrowded households are renters (375 households). Information on the lack of plumbing and kitchen facilities is shown in Table 5. Here, CHAS data reports that 30 families lack one or both types of essential facilities. This housing problem is shown to affect renter households exclusively.

The remainder of this section characterizes local housing needs in more detail. The Market Analysis component of the Consolidated Plan identifies resources available to respond to these needs (public housing, tax credit, and other subsidized properties, housing and services for the homeless, and others).

Summary of Housing Needs

Table 3. Housing Needs Assessment Demographics

Demographics	Base Year: 2014	Most Recent Year: 2019	% Change
Population	48,792	56,448	16%
Households	14,581	16,332	12%
Median Income	\$64,672.00	\$77,065.00	19%

Data Source: 2010-2014 ACS (Base Year), 2015-2019 ACS (Most Recent Year)

Number of Households Table

Table 4, Total Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	1,765	1,775	2,710	2,315	6,670
Small Family Households	780	825	1,450	1,405	4,619
Large Family Households	310	660	630	420	1,115
Household contains at least one person 62-74 years of age	320	215	340	365	890
Household contains at least one person age 75 or older	315	134	120	180	195
Households with one or more children 6 years old or younger	535	840	925	670	1,805

Data Source: 2013-2017 CHAS

Housing Needs Summary Tables

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

Table 5. Housing Problems Table

	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	10	0	20	0	30	0	0	0	0	0
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	90	40	0	30	160	10	0	15	0	25
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	115	60	155	45	375	60	160	15	45	280
Housing cost burden greater than 50% of income (and none of the above problems)	580	190	0	0	770	365	205	235	10	815
Housing cost burden greater than 30% of income (and none of the above problems)	75	340	430	125	970	105	235	620	635	1595
Zero/negative income (and none of the above problems)	70	0	0	0	70	10	0	0	0	10

Data Source: 2013-2017 CHAS

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

Table 6. Housing Problems 2

	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	790	295	175	70	1,330	435	365	265	55	1,120
Having none of four housing problems	220	530	1,010	570	2,330	240	585	1,260	1,620	3,705
Household has negative income, but none of the other housing problems	70	0	0	0	70	10	0	0	0	10

Data Source: 2013-2017 CHAS

3. Cost Burden > 30%

Table 7. 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	40	190	215	445	30	70	355	455
Large Related	45	115	145	305	25	170	180	375
Elderly	10	25	20	55	35	35	55	125
Other	25	55	70	150	15	4	45	64
Total need by income	120	385	450	955	105	279	635	1,019

Data Source: 2013-2017 CHAS

4. Cost Burden > 50%

Table 8. 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	320	85	0	405	150	130	190	470
Large Related	170	100	0	270	60	75	0	135
Elderly	70	19	0	89	190	45	24	259
Other	180	25	0	205	30	0	20	50
Total need by income	740	229	0	969	430	250	234	914

Data Source: 2013-2017 CHAS

5. Crowding (More than one person per room)

Table 9. Crowding Information – 1/2

	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	50	60	100	35	245	60	150	10	20	240
Multiple, unrelated family households	65	0	50	10	125	0	10	4	25	39
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	115	60	155	45	375	60	160	15	45	280

Data Source: 2013-2017 CHAS

Table 10. Crowding Information – 2/2

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present								

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 housing assistance are included in the “other, non-family” category of Tables 7 and 8. This category includes multi-person households whose members are unrelated (e.g. roommates, un-married partners, etc.). There are an estimated 214 single-person or multi-person unrelated households that have low-to-moderate incomes and are cost-burdened. The majority (70%) of these cost-burdened “other, non-family” households are renters, while 30% are homeowners.

Looking further at “other, non-family” renters who are cost-burdened, most of these renters are moderate-income (47%). Around 70% of “other, non-family” homeowners who are cost-burdened have moderate incomes. These figures indicate that most “other, non-family” homeowners may struggle to make ends meet, despite earning up to 80% AMI. Around 255 “other, non-family” households are also severely cost-burdened. Severe cost burdens primarily affect the lowest income renters and homeowners. 88% of severely cost-burdened renters are very low-income while 60% of severely cost-burdened homeowners have very low incomes. No “other, non-family” households are reported to be overcrowded.

While CHAS data does not look exclusively at seniors who live alone, 2013-2017 ACS estimates indicate that 763 householders aged 65 and over live alone.¹ Using this figure, senior householders living alone make up nearly 36% of all 2,140 elderly/near-elderly households.² Exact data on the number of low-to-moderate income seniors living alone is not available. However, Table 4 shows that approximately 1,324 (or 43% of) elderly or near-elderly households are low-to-moderate income. Furthermore, elderly renters and homeowners with low to moderate incomes are more likely to be severely cost-burdened – spending more than half their monthly income on housing costs – than to be cost-burdened (see Tables 7 and 8). Therefore, elderly householders living alone may have a significant need for housing assistance, especially considering common housing issues identified during the stakeholder engagement process such as rising property tax rates and rising rents citywide.

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.

¹ 2013-2017 ACS 5-Year Estimates, Table B11010

² 2013-2017 ACS 5-Year Estimates, Table B25007

2017 ACS estimates indicate that Commerce City has 1,441 persons with hearing difficulty, 751 persons with vision difficulty, 1,492 persons with cognitive difficulty, 2,043 persons with ambulatory difficulty, 807 persons with self-care difficulty, and 1,394 persons with an independent living difficulty.³ There is no data available to specify the number of disabled households requiring housing assistance. However, patterns found among ACS data on household income and housing problems can be used to estimate the need for housing assistance among the disabled population. An estimated 904 disabled persons were living below the poverty level in Commerce City in 2017.⁴ Comparatively, there were 1,490 very low-income households in the city with at least one housing problem in that year. These figures indicate that a significant share of the city's very low-income households may have residents with a disability. People with disabilities often face greater difficulty finding appropriate housing, given the scarcity of housing that is both affordable and accessible to people with disabilities.

There is limited data on the number of victims of domestic violence, dating violence, sexual assault, and stalking that require housing assistance in Commerce City. Between 2018 and 2020, the city assisted 195 persons with temporary emergency housing through its Domestic Violence Victims (DVV) Support Program. County-level data from the 2019 Point-in-Time count also indicates that 35 homeless persons counted in Adams County were fleeing domestic violence. This figure represented 7.4% of the county's homeless population.

What are the most common housing problems?

CHAS data indicates that the most common housing problems in Commerce City are unaffordable housing costs. Table 7 indicates that 1,974 households - nearly one-quarter of all low to moderate-income Commerce City households - are cost-burdened. Another 1,883 households (22% of all low to moderate-income households) are severely cost-burdened, as indicated in Table 8.

2015-2019 ACS 5-Year Estimates further indicate that approximately 33% of the city's housing structures were built prior to 1980.⁵ The age of the city's structures may indicate an increased need for homeowners to conduct housing repairs or ongoing maintenance costs. A significant number of homes built before 1978 may also contain lead paint or other lead-based materials, which were permitted prior to that year.

³ 2013-2017 ACS 5 Year Estimates, Table S1810

⁴ 2013-2017 ACS 5 Year Estimates, Table C18130

⁵ 2015-2019 ACS 5-Year Estimates, Table B25034

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

CHAS data indicates that low-to-moderate income small family households are more likely than other household types to be cost-burdened. Of the city's 1,974 cost-burdened households, 46% are small family households. Small families are also most likely to be severely cost-burdened, comprising 46% of the city's severely cost-burdened households. Very low-income renters, very-low-income homeowners, and moderate-income homeowners are also more likely to experience cost burdens and severe cost burdens.

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

According to 2013-2017 5-Year ACS data, around 11% of residents in Commerce City are living at or below the poverty level. The majority of the population living at or below the poverty level are between the ages of 18 and 64, Hispanic, female, and employed. However, a significant share of Commerce City residents living below the poverty level are children under 18 (2,635 children). According to stakeholders, Adams County has the highest population of homeless students in the state of Colorado, as defined by the McKinney Vento Homeless Assistance Act.

Low wages, rising rental costs, and the scarcity of affordable housing for low- and extremely low-income households place vulnerable households at even greater risk for eviction or homelessness. Individuals and families at imminent risk and those who have experienced homelessness and are receiving rapid re-housing assistance often face a myriad of barriers including prior histories of homelessness or eviction, chronic physical or mental disabilities, poor credit, criminal histories, and limited access to additional education or job skills training. The greatest need of formerly homeless families and individuals receiving rapid re-housing assistance is the availability of standard housing that is affordable to households at or below 50% AMI.

For formerly homeless families and individuals nearing the termination of assistance, the top needs are for increased, sustainable income (earned and unearned); access to Social Security disability and other mainstream benefits; linkages to health, mental health, and legal services; access to affordable transportation and childcare; access to transitional and supportive housing programs; and ongoing case management and supportive services.

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 (MDHI) provides examples of persons considered to be at-risk of homelessness, including persons “living with friends and family” or “paying to live in a hotel.”⁶ The 2020 Point in Time count does not include data on these at-risk groups. However, the Point in Time count indicated that there were also 40 persons living in transitional housing, and these individuals may also be considered at risk of homelessness.

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

The most fundamental risk factor for homelessness is extreme poverty, leading to unaffordable rents or homeowner costs. Renters with incomes under 30% HAMFI and housing cost burdens over 50% are at risk of homelessness, especially if they experience a destabilizing event such as a job loss, reduction in work hours, or medical emergency/condition, or lack knowledge of available housing resources. Such factors may also put low-income homeowners at risk of foreclosure and subsequent homelessness.

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

This section assesses the housing needs of racial and ethnic groups at various income levels in comparison to needs at that income level as a whole to identify any disproportionately greater needs. 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. Tables 13 through 16 identify the number of households experiencing one or more of the four housing problems by householder race, ethnicity, and income level. The four housing problems include: (1) cost burdens (paying more than 30% of income for

⁶ Metro Denver Homeless Initiative. (2020) “Point in Time (PIT) Count & Survey.” https://www.mdhi.org/point_in_time

housing costs); (2) overcrowding (more than 1 person per room); (3) lacking complete kitchen facilities; and (4) lacking complete plumbing facilities.

Income classifications include:

- Very low income – up to 30% of area median income (AMI) or \$31,450 for a family of four;
- Low income – 30 to 50% AMI or \$31,451 to \$52,400 for a family of four;
- Moderate income – 50 to 80% AMI or \$52,401 to \$79,900 for a family of four;
- Middle income – 80 to 100% AMI or \$79,901 to \$104,800 for a family of four.

0%-30% of Area Median Income

Table 11. Disproportionally Greater Need 0 - 30% AMI

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	1,405	280	80
White	495	145	35
Black / African American	49	0	0
Asian	19	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	775	135	45

Data Source: 2013-2017 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%

Of the city's 1,765 very low-income households, approximately three-fourths (76%) have at least one housing problem. All Black and Asian households at this income level have at least one housing problem. Eighty-one percent of very low-income Hispanic households have a housing problem, as do 73% of very low-income White households. Native American and Pacific Islander households were not reported at this income level.

30%-50% of Area Median Income

Table 12. Disproportionally Greater Need 30 - 50% AMI

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	1,235	540	0
White	460	260	0
Black / African American	75	45	0
Asian	34	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	660	190	0

Data Source: 2013-2017 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%

Commerce City has 1,775 households that live on low incomes. Of these low-income households, 69% have at least one housing problem. All Asian households at this income level experience a housing problem. Hispanic households at this income level also experience above average rates of housing problems, with 78% of Hispanic households having at least one housing problem. Sixty-four percent of low-income White households, as well as 62% of low-income Black households, have at least one housing problem. Native American and Pacific Islander households were not reported at this income level.

50%-80% of Area Median Income

Of the 2,710 moderate-income households in Commerce City, 55% have at least one housing problem. At this income level, all Pacific Islander households and 90% of Black households have at least one housing problem. Sixty-nine percent of moderate-income Asian households have a housing problem. Comparatively, 54% of moderate-income white households and 51% of moderate-income Hispanic households experience housing problems. None of the city's moderate-income Native American households were identified as having a housing problem.

Table 13. Disproportionally Greater Need 50 - 80% AMI

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	1,490	1,220	0
White	600	515	0
Black / African American	90	10	0
Asian	45	20	0
American Indian, Alaska Native	0	4	0
Pacific Islander	45	0	0
Hispanic	685	665	0

Data Source: 2013-2017 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

Table 14. Disproportionally Greater Need 80 - 100% AMI

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	885	1,430	0
White	430	605	0
Black / African American	35	25	0
Asian	15	10	0
American Indian, Alaska Native	90	0	0
Pacific Islander	0	0	0
Hispanic	315	765	0

Data Source: 2013-2017 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%

Of the 2,315 Commerce City residents earning 80%-100% AMI – also described as “middle incomes” – 38% have at least one housing problem. All Native American households with middle incomes have a housing problem, as do 60% of Asian households and 58% of

Black households. White middle-income households also have an above-average rate of housing problems (41%). Only 29% of middle-income Hispanic households have a housing problem. There were no Pacific Islander households shown at this income level.

Discussion

Housing problems affect many Commerce City households earning less than 100% AMI. At middle incomes, the share of all households with at least one housing problem is 38%. The share of households with housing problems increases to 55% for the city's moderate-income households, 69% for low-income households, and 76% for very low-income households. Households with lower annual incomes are most likely to spend more than 30% of their income on housing, live in overcrowded conditions, or have incomplete bathroom or kitchen facilities.

Compared to white households, non-white households are disproportionately affected by housing problems. At very low incomes, all Black and Asian households experience at least one housing problem. Hispanic households also experience disproportionate rates of housing problems, affecting 81% of very low-income Hispanic households. At low incomes, Asian and Hispanic households experience disproportionate rates of housing problems. 78% of the 850 low-income Hispanic households have a housing problem, as do all low-income Asian households. Asian households are again disproportionately affected with housing problems at moderate-income levels, which affect 69% of moderate-income Asian households, compared to 55% of all moderate-income households city-wide. Black and Pacific Islander households are also disproportionately affected at moderate incomes, with 100% of Pacific Islander households and 90% of Black households at this income level having a housing problem. Finally, at middle incomes, Native American households experience disproportionate rates of housing problems with all households having a housing problem compared to 38% of all middle-income families across the city. Asian and Black households are also disproportionately affected at middle incomes, with 60% of Asian households and 58% Black households having at least one housing problem.

Data on disproportionate housing needs indicates that while some non-white groups may be small in number, these groups – particularly Black, Asian, and Pacific Islander households – often experience higher rates of housing problems compared to their share of the population. Hispanic households, which make up a larger share of the population overall, experience disproportionate rates of housing problems especially at very low and low incomes.

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 assesses the severe housing needs of racial and ethnic groups at various income levels in comparison to severe needs at that income level as a whole to identify any disproportionately greater needs. As the preceding analysis, this section uses HUD's definition of disproportionately greater need, which occurs when one racial or ethnic group at a given income level experiences housing problems at a rate that is at least 10 percentage points greater than the income level as a whole.

Tables 17 through 20 identify the number of households with one or more of the severe housing needs by householder race and ethnicity. The four severe housing problems include: (1) severe cost burden (paying more than 50% of income for housing and utilities); (2) severe crowding (more than 1.5 people per room); (3) lack of complete kitchen facilities; and (4) lack of complete plumbing facilities.

Income classifications include:

- Very low income – up to 30% of area median income (AMI) or \$31,450 for a family of four;
- Low income – 30 to 50% AMI or \$31,451 to \$52,400 for a family of four;
- Moderate income – 50 to 80% AMI or \$52,401 to \$79,900 for a family of four;
- Middle income – 80 to 100% AMI or \$79,901 to \$104,800 for a family of four.

0%-30% of Area Median Income

Of the 1,765 very low-income households in Commerce City, 1,225 households (or 69%) have at least one severe housing problem. All Black and Asian households at this income level have a severe housing problem. Around 72% of Hispanic households have a severe housing problem. Comparatively, 60% of very low-income white households have a severe housing problem. No Native American or Pacific Islander households were identified as very low-income.

Table 15. Severe Housing Problems 0 - 30% AMI

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	1,225	460	80
White	405	240	35
Black / African American	49	0	0
Asian	19	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	690	225	45

Data Source: 2013-2017 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

Table 16. Severe Housing Problems 30 - 50% AMI

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	660	1,115	0
White	250	470	0
Black / African American	65	55	0
Asian	29	4	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	315	540	0

Data Source: 2013-2017 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%

Around 37% of the city's 1,775 low-income households have a severe housing problem. Low-income Asian households are shown to be disproportionately affected, with 88% having at least one severe housing problem. In comparison, 54% of low-income Black households, 37% of low-income Hispanic households, and 35% of low-income White

households have a severe housing problem. Native American and Pacific Islander households were not reported at this income level.

50%-80% of Area Median Income

Sixteen percent of Commerce City's 2,710 moderate-income households have a severe housing problem. Moderate-income Black and Asian households are disproportionately affected, with 35% of Black households and 31% of Asian households having at least one severe housing problem. White and Hispanic households at this income level experience severe housing problems at around the city's average (17% and 15% respectively). None of the city's Native American and Pacific Islander households at moderate incomes are reported to have severe housing problems.

Table 17. Severe Housing Problems 50 - 80% AMI

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	440	2,270	0
White	190	930	0
Black / African American	35	65	0
Asian	20	45	0
American Indian, Alaska Native	0	4	0
Pacific Islander	0	45	0
Hispanic	200	1,150	0

Data Source: 2013-2017 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

Out of 2,315 middle-income households in Commerce City, 5% experience severe housing problems. At middle incomes, Black households experience disproportionate rates of severe housing problems, with 25% of these households having a housing problem. Six percent of Hispanic households and 4% of white households at this income level have at least one severe housing problem. None of the city's Asian or Native American households at this income level are reported to have a severe housing problem. CHAS data reports that there are no Pacific Islander households at this income level.

Table 18. Severe Housing Problems 80 - 100% AMI

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	125	2,190	0
White	45	985	0
Black / African American	15	45	0
Asian	0	25	0
American Indian, Alaska Native	0	90	0
Pacific Islander	0	0	0
Hispanic	65	1,015	0

Data Source: 2013-2017 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

As household incomes decrease in Commerce City, the likelihood of experiencing a severe housing problem significantly increases. Severe housing problems include spending more than 50% of household income on housing costs, living in severely overcrowded conditions, or lacking adequate kitchen and bathroom facilities. Only one in every 20 households earning between \$79,901 and \$104,800 experiences one of the severe housing problems. One in six households earning \$52,401 and \$79,900 has a severe housing problem. Thirty-seven percent of low-income households (earning between \$31,451 and \$52,400) have a severe housing problem. Very low-income households experience the greatest strain, with **69% or nearly 7 out of every 10 households** earning less than \$31,450 having a severe housing problem.

At all income levels, Black households are disproportionately affected with severe housing problems. Asian households are also disproportionately affected by severe housing problems at very low, low, and moderate incomes. CHAS data indicates that these groups are uniquely affected by severe housing problems when compared to other racial and ethnic groups and the city as a whole.

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

This section assesses 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. While the preceding sections assessed all housing and severe housing problems, Table 19 focuses only on what share of their income 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.

Housing Cost Burden

***Table 19. Greater Need: Housing Cost Burdens AMI**

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	10,125	3,125	1,915	80
White	5,875	1,360	790	35
Black / African American	235	85	150	0
Asian	145	45	50	0
American Indian, Alaska Native	50	90	0	0
Pacific Islander	0	45	0	0
Hispanic	3,580	1,445	860	45

Data Source: 2013-2017 CHAS

Discussion

In 2017, around two-thirds (66%) of Commerce City households could cover their housing costs without spending more than 30% of their income. However, the remaining **one-third of city residents were either cost-burdened (20%), severely cost-burdened (13%), or had no income (1%).**

Approximately one in five Commerce City households (20%) is cost-burdened, spending between 30-50% of their income on housing costs. Native American and Pacific Islander households are disproportionately affected by cost burdens, with all Pacific Islander households being cost-burdened and 32% of Native American households being cost-burdened. Hispanic households are not disproportionately affected but have an above-average share of cost-burdened households (24%). All other racial and ethnic groups in the city experience below-average rates of housing cost burden. 19% of Asian households are cost-burdened, as are 18% of Black households, and 17% of white households.

Nearly one of every eight Commerce City households (13%) is severely cost-burdened, spending more than 50% of their income on housing costs. Black households are disproportionately affected by severe housing costs. Nearly 32% of Black households are severely cost-burdened. Asian and Hispanic households also have above average rates of severe cost burdens (21% and 15% respectively). Around 10% of white households experience severe cost burdens, with none of the city's Native American or Pacific Islander households identified as having severe cost burdens.

Of those households reporting no/negative income, 45 of the 80 households without income are Hispanic, representing less than 1% of all Hispanic households. White households make up the remaining 35 households without income (or 0.4% of all White households). CHAS data does not indicate the number of Black, Asian, Native American, or Pacific Islander households without income.

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?

Black and Asian households experience disproportionate rates of housing problems and severe housing problems, including severe cost burdens, at nearly all income levels. At very low incomes, housing problems affect all Black and Asian households and 81% of

Hispanic households. Severe housing problems also affect all very low-income Black and Asian households, as well as 72% of very low-income Hispanic households.

At low incomes, all Asian households experience housing problems. Asian and Black households also experience disproportionate rates of severe housing problems, with 88% of all low-income Asian households and 54% of low incomes Black households experiencing a housing problem. At moderate incomes, Pacific Islander households have the highest rate of housing problems (100%), followed by Black households (90%) and Asian households (69%). Black and Asian households experience disproportionate rates of severe housing problems at moderate incomes, with nearly one-third of these groups experiencing severe housing problems (35% and 31%, respectively).

Lastly, at middle incomes, all Native American households have a disproportionate rate of housing problems. Black and Asian households continue to have disproportionate rates of housing problems, affecting 60% of middle-income Asian households and 58% of middle-income Black households. Black households are the sole group with disproportionate rates of severe housing problems at middle incomes (affecting 25% of middle-income Black households).

Cost burdens have their greatest effect on Commerce City's Pacific Islander households, where 100% of Pacific Islander households are considered cost-burdened. Native American households also have disproportionately higher rates of cost burdens, affecting nearly one-third (32%) of these families. Severe cost burdens have their greatest effect on the city's Black households, where nearly one-third (32%) of these households spend more than 50% of their monthly income on housing costs.

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

Input collected during the community engagement process identified home maintenance, weatherization and energy efficiency, homelessness prevention (especially as the City recovers from the COVID-19 pandemic), and additional affordable housing supplies as important needs.

In addition to housing needs, stakeholders identified the following needs experienced by low- and moderate-income households in Commerce City: food security, workforce development, literacy, transportation (and its related infrastructure), access to bilingual services, youth education and employment, domestic violence victims' services, and senior services.

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

Asian and Pacific Islander households predominately reside in north Commerce City between Havana Street and Tower Road. Hispanic households tend to live south of E. 72nd Avenue, between Vasquez Blvd and Quebec Parkway. Native American and Black households tend to live in both aforementioned areas.

NA-35 Public Housing – 91.205(B)

Introduction

Publicly supported housing is provided by two agencies in Commerce City: The Adams County Housing Authority (doing business as Maiker Housing Partners) and the Commerce City Housing Authority. According to its 2020-2025 5-Year PHA Plan, Maiker Housing Partners offers 42 public housing units and 1,519 housing choice vouchers across Adams County. CCHA does not offer any federally recognized public housing or vouchers. However, the city's most recent data indicates that CCHA offers approximately 110 vouchers throughout Adams County, as well as 229 affordable LIHTC units created through public-private partnerships. The following tables represent data for Maiker Housing Partners as the county's public housing provider. Recent HUD data, as displayed in Table 22, indicates several of the voucher types used in the county. By share, 98% of the county's vouchers are tenant-based, 3% are designated for family, with at least four project-based vouchers and one VASH voucher for veterans in use.

As shown in Table 23, the average county voucher holder lives in a very low-income household, earning around \$11,500 annually. Approximately 16% of MHP voucher holding households have an elderly resident aged 62 or older. A slightly larger share of voucher-holding households (20%) has a person with a disability. Of the county's public housing residents, 98% are seniors. All public housing residents and voucher holders are reported to have requested accessibility features. Tables 24 and 25 provide data on the race or ethnicity of the residents in publicly supported housing. 95% of the county's public housing households and 85% of voucher-holding households identify as White. Black households make up 11% of voucher holding households, while Asian and Native American households make up approximately 2% each. Half (50%) of all public housing households are Hispanic. Hispanic households also make up 56% of all voucher holding households, compared to 43% that are non-Hispanic.

Totals in Use

Table 20. Public Housing by Program Type

	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

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

Data Source: "Commerce City (part), A Picture of Subsidized Households, 2020

Characteristics of Residents

Table 21. Characteristics of Public Housing Residents by Program Type

	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
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

Data Source: PIC (PIH Information Center)

Race of Residents

Table 22. Race of Public Housing Residents by Program Type

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				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
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

Data Source: PIC (PIH Information Center)



Ethnicity of Residents

Table 23. Ethnicity of Public Housing Residents by Program Type

Ethnicity	Program Type								
	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

Data Source: PIC (PIH Information Center)

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

According to HUD PIC data, there are at least 1,374 voucher holding households in Adams County, of which 280 households (20%) have at least one family member with a disability. Additional data provided in Table 23 indicates that 42 traditional public housing residents and 1,374 voucher holders requested units with accessibility features. Many people with disabilities live on limited incomes, often just a \$783/month SSI payment. There are few affordable housing options for disabled residents other than public housing. The availability of additional units with accessibility features is one of the greatest needs of this population.

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

CCHA and MHP tenants are most immediately in need of opportunities and supports to grow and attain a level of self-sufficiency. These supports include resources in areas such as childcare, transportation, food, job training, adult education, and adequate home internet services.

Stakeholders shared concerns about the overwhelming obstacles of getting housed for residents with a criminal history, evictions on their record, bad credit, and application fees, and the combination of first-month, last-month, and security deposits required to move into a unit.

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

The needs of voucher holders and LIHTC residents are different from those of the city's overall low- and moderate-income population primarily in that these residents are housed in stable and decent housing. With this need met, tenants can focus on other needs that families typically face in addition to housing insecurity. These other needs include childcare, transportation, food, job training, adult education, and acquiring adequate internet service to allow children and adults to work and attend school from home, when possible.

NA-40 Homeless Needs Assessment – 91.205(C)

Introduction:

This section provides estimates of the population experiencing homelessness in the region and details the needs of people experiencing homelessness in Commerce City. The City is part of the Metro Denver Continuum of Care (CoC), which conducts an annual Point-

in-Time count of people who are homeless during the last ten days of January each year. The 2020 Point-in-Time count for the Metro Denver CoC was held on January 27, 2020. It counted a total of 476 people experiencing homelessness in Adams County.

Table 24. Metro Denver CoC 2020 Point-in-Time Homeless Count: Numbers of Households and Persons Experiencing Homelessness in Adams County

	Sheltered	Unsheltered	Total
Total number of households	240	139	379
Total number of persons	316	160	476
Persons in households with children	83	7	90
Persons in households without children	233	153	386
Chronically homeless individuals	85	85	170
Veterans	Data unavailable	Data unavailable	40
Unaccompanied youth	Data unavailable	Data unavailable	14
Fleeing domestic violence	Data unavailable	Data unavailable	35

Data Source: 2020 Point-in-Time Count

Note: The Metro Denver Homeless Initiative removed categories with fewer than five records from PIT data.

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):

Of the 476 people experiencing homelessness counted in the Point-in-Time count, 170 were chronically homeless (35.7% of all people experiencing homelessness), 40 were veterans (8.4%), 90 were in families with children (18.9%), 14 were unaccompanied youth (2.9%), and 35 were fleeing domestic violence (7.4%).

The continual ebb and flow of this transient community make an accurate census of the homeless is impossible. It is important to note the PIT count was taken during winter in Colorado when much of the homeless have migrated to warmer climates.

According to Adams County, the 2020 PIT Homeless Count suggests that approximately 950 to 1,450 residents in Adams County will experience homelessness during the next year.

The needs of residents experiencing homelessness and at risk for homelessness are going to become more acute with the economic fallout of the COVID-19 pandemic.

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

Of the 90 individuals in households with children, 7 were unsheltered (7.8%), 59 were in emergency shelters (65.6%), and 24 were in transitional housing (26.7%).

Of the 40 veterans, at least 17 were unsheltered and at least 12 were in emergency shelters.⁷

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

The Point-in-Time count categorized the number of individuals experiencing homelessness in Adams County by race and ethnicity. The count found that 53.4% of people experiencing homelessness in the county were white, 31.1% were Black or African American, 10.6% were multiple races, and 4.9% were American Indian or Alaska Native. An estimated 20.8% of residents experiencing homelessness were Hispanic or Latino (of any race, see Table 30).

Table 25. Metro Denver CoC 2020 Point-in-Time Homeless Count: Race and Ethnicity of People Experiencing Homelessness in Adams County

Race	Number	%
White	251	53.4%
Black or African American	146	31.1%
Multiple Races	50	10.6%
American Indian or Alaska Native	23	4.9%
Asian	-	-
Native Hawaiian or Pacific Islander	-	-
Ethnicity	Number	%
Non-Hispanic / Non-Latino	377	79.2%
Hispanic / Latino	99	20.8%

Data Source: 2020 Point-in-Time Count

Note: The Metro Denver Homeless Initiative removed categories with fewer than five records from PIT data

⁷ The Metro Denver Homeless Initiative removed categories with fewer than five records were removed from PIT data

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The 2020 Point-in-Time Count noted a total of 476 people experiencing homelessness in Adams County, including 316 sheltered (66.4%) and 160 unsheltered persons (33.6%). Note that these figures do not represent the entire population experiencing homelessness in Adams County, but rather the number of people experiencing homelessness who were sheltered and unsheltered at the time of the 2020 Point-in-Time count. As the inventory of homeless facilities in the area shows, a considerably higher number of people who are homeless are assisted within the county than the Point-in-Time count reflects. Further, stakeholders interviewed during this planning process noted that people experiencing homelessness may be doubling up with other families, staying with friends or relatives, or living in vehicles. For this reason, many people experiencing homelessness may not be included in the Point-in-Time count.

NA-45 Non-Homeless Special Needs Assessment - 91.205 (B, D)

Introduction:

This section discusses the characteristics and needs of people in various subpopulations in Commerce City who are not necessarily homeless but may require supportive services, including people with HIV/AIDS and their families, the elderly, people with disabilities (mental, physical, or developmental), people with alcohol or drug addiction, survivors of crime, and individuals with a criminal record.

Describe the characteristics of special needs populations in your community:**ELDERLY AND FRAIL ELDERLY**

An estimated 7.4% of Commerce City's population is elderly, aged 65 and over, and 2.6% of the population is aged 75 and over, according to 2015-2019 5-Year American Community Survey estimates.

An estimated 36.5% of elderly individuals aged 65 and over in the city have a disability. Senior households may be less able to cope with increasing housing costs (rents for renters and property taxes for owners) as they are more likely to be living on a fixed retirement income. Most seniors desire to age in place but may need accessibility modifications as they age and additional support services to properly maintain their home and property.

Many may also require transportation services and in-home health care at certain stages.⁸

According to the Home Repair Program, the most common accessibility requests are:

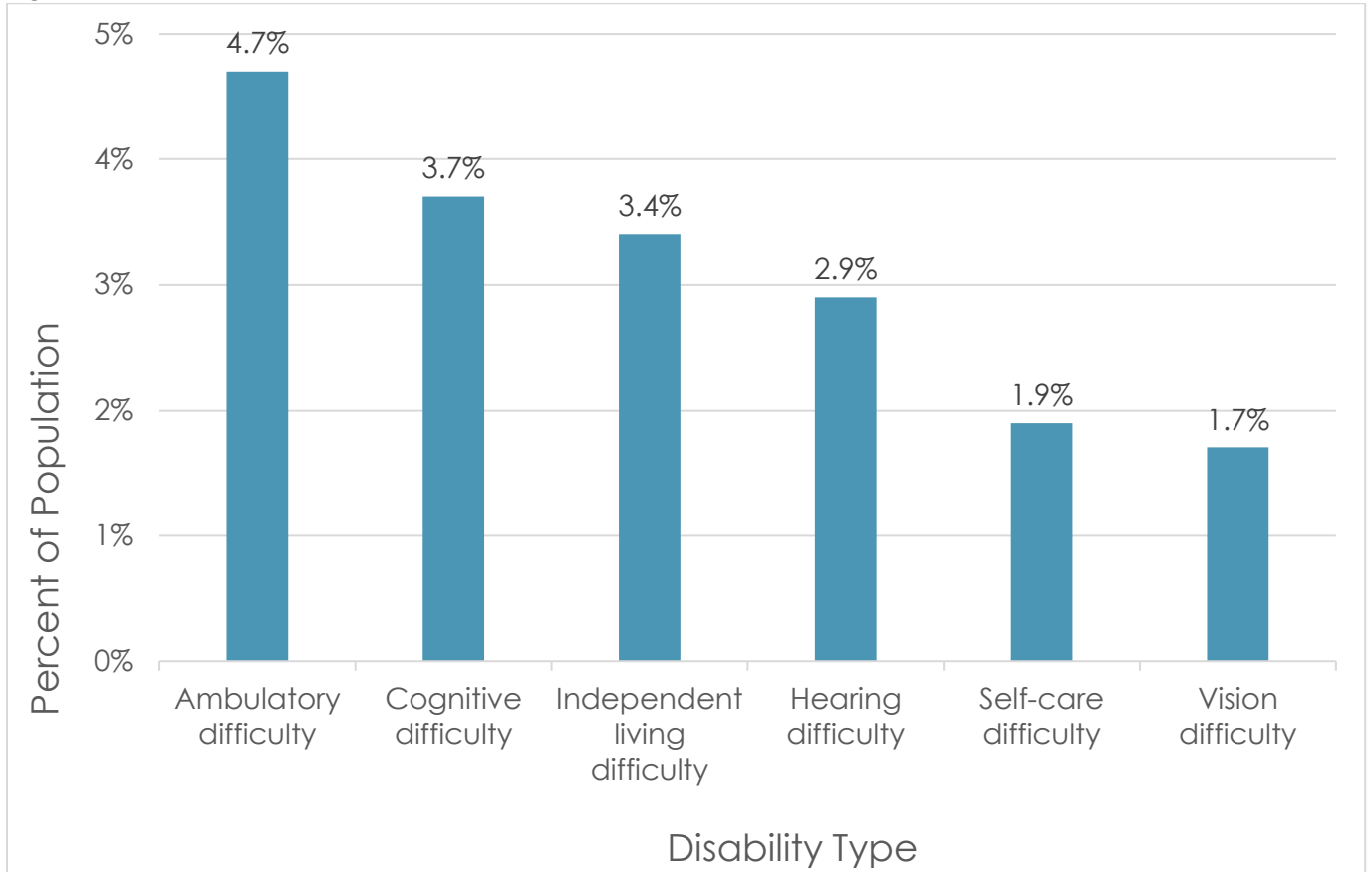
- Ramps
- Walk-in showers
- Grab bars and railings
- Threshold modifications
- Stair lifts

PEOPLE WITH DISABILITIES

As estimated 9.6% of Commerce City residents have one or more disabilities. Figure 1 shows shares of the population with a disability by disability type.

⁸ Adams County 2020-2024 Consolidated Plan, page 54.

Figure 1. Disability by Type in Commerce City, 2015-2019



Data Source: 2015-2019 American Community Survey 5-Year Estimates

PEOPLE WITH HIV/AIDS AND THEIR FAMILIES

In Adams County, about 270 out of every 100,000 residents were living with HIV, and 13.5 of every 100,000 people were newly diagnosed with HIV in 2018.⁹ This equates to an estimated 152 residents in Commerce City, based on the city's population of 56,448.¹⁰

PEOPLE WITH ALCOHOL OR DRUG ADDICTION

The region that includes Adams, Arapahoe, Douglas, and Elbert counties has an estimated 6.0% rate of alcohol use disorder in the past year for individuals aged 12 and older, according to 2016-2018 data from the U.S. Substance Abuse & Mental Health Data Archive (SAMHDA). About 2.5% of the region's population is estimated to have used cocaine use in the past year, and heroin use in the past year is estimated at 0.3%.¹¹ The rate of drug overdose deaths in Adams County was 20 per 100,000 residents from 2017 to 2019.¹²

SURVIVORS OF DOMESTIC VIOLENCE

The Centers for Disease Control estimates that 7.2% of women in Colorado have experienced any contact sexual violence, physical violence, or stalking by an intimate partner in the past 12 months.¹³ This equates to an estimated 2,028 women living in Commerce City, based on the city's 2015-2019 female population of 28,172.¹⁴ Data is not available for men in Colorado.

RE-ENTRY POPULATIONS

In the state of Colorado, an estimated 79,000 residents are on probation, and 9,700 are on parole.¹⁵ This equates to an estimated 795 residents of Commerce City on probation and 98 on parole, based on city and state populations for 2015-2019. The considerable numbers of city residents under criminal justice supervision indicate a continuing need to address the housing and supportive service needs of this population in Commerce City.

⁹ Emory University Rollins School of Public Health, AIDSvu. (2018). Retrieved from: <https://map.aidsvu.org/map>

¹⁰ 2015-2019 American Community Survey Five-Year Estimates

¹¹ Substance Abuse & Mental Health Data Archive. "Interactive National Survey on Drug Use and Health Substate Estimates." <https://pdas.samhsa.gov/saes/substate>

¹² County Health Rankings & Roadmaps. "Drug Overdose Deaths." <https://www.countyhealthrankings.org/>

¹³ Centers for Disease Control and Prevention. The National Intimate Partner and Sexual Violence Survey (NISVS) | 2010-2012 State Report. <https://www.cdc.gov/violenceprevention/pdf/NISVS-StateReportBook.pdf>

¹⁴ 2015-2019 American Community Survey 5-Year Estimates, Table DP05

¹⁵ Prison Policy Initiative. Profiles. Retrieved from: <https://www.prisonpolicy.org/profiles>

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, survivors of domestic violence, and reentry populations) were determined by input sought from service providers, residents and other stakeholders through public meetings and stakeholder interviews, as well as through the research and studies cited. The following categories contain the needed housing and supportive services for the City's special needs residents.

HOUSING THAT IS AFFORDABLE, ACCESSIBLE, SAFE, AND LOW-BARRIER

Colorado's extremely high housing costs make it difficult for populations with special needs—who often live on very low incomes—to afford housing. In 2021, Colorado was ranked 13th highest in the nation for the cost of housing.¹⁶ Over the past decade, Colorado liability legislation has almost eliminated the development of affordable middle housing including condominiums and townhouses. These are important housing stages to establish and/or keep ownership equity as residents move from renting to owning and as seniors downsize from their family homes. Building home equity is a leading step in building personal wealth.

Residents with special needs often live at or below the federal poverty level and have great obstacles in finding suitable housing and building or protecting ownership equity. Low incomes force many residents to live in congregate care, have roommates, or live with family. HUD's fair market rent documentation for FY 2021 estimates fair market rent for a two-bedroom unit in Adams County at \$1,605 per month and a three-bedroom unit at \$2,186 per month. Because of the high cost of housing, there is a need to increase the availability of affordable housing for populations with special needs.

This could include options such as smaller housing units; multifamily 'missing middle housing, including duplexes, triplexes, quadruplexes, and other small multifamily units; accessory dwelling units; cohousing with shared services; and other housing types that support increased levels of affordability. Residents and stakeholders who participated in public meetings and stakeholder interviews also discussed a need to increase the supply of affordable housing that is in good condition and support housing rehabilitation and weatherization for low-income homeowners.

¹⁶ World Population Review.com, 2021 Housing Cost of Living Index by State

Housing may be inaccessible to populations with special needs for a variety of reasons. Persons with disabilities may find that their housing options are not ADA compliant or are outside the service range for public transportation. People living with HIV/AIDS, immigrants and refugees, people with criminal histories, and other populations with special needs are often discriminated against in housing application processes. People living with HIV/AIDS have a particular need for low-barrier housing that is free from requirements surrounding drug testing, sobriety, criminal background, and medical appointments. For these reasons, there is a need to ensure that accessible, low-barrier housing is available and to take actions to reduce discrimination, such as providing fair housing services.

The elderly and frail elderly, people with disabilities, and others who may not have access to vehicles often need housing that is accessible to transportation, recreation, goods, services, and employment. These populations need housing options that are integrated into the community to provide access and reduce social isolation. Like other populations with special needs, people living with HIV/AIDS also need housing that provides easy access to health services, resources, and employment.

Safe and clean housing is another need for people with special needs. Units that are not clean or have other unhealthy conditions can worsen health issues for people who are already vulnerable. With the location of an oil refinery and other industrial businesses in and near to the City, air and water quality concerns were mentioned several times by the public input attendees. Residents sensitive to air quality issues, especially at high altitudes are especially vulnerable.

TRANSPORTATION

The need for improved public transportation ranked second in the stakeholder identified needs. People with disabilities and others who may not have access to or the ability to drive vehicles need housing close to transportation services to access employment, health care, goods, services, and recreation opportunities. Persons with HIV/AIDS need housing nearby transportation services to access health services and other resources. If transit is not within walking distance, special needs populations require accessible, reliable transportation services to provide access to everyday needs.

SPECIALIZED HOUSING AND SUPPORTIVE SERVICES

Specialized housing is often needed to target the needs of specific populations, although the Housing First model emphasizes that support services should not be required for people to access housing. People with intellectual or physical disabilities, people living with HIV/AIDS, and people with alcohol or drug addiction have specific housing needs

that may be addressed through housing with wraparound services, such as case management, life skills programming, and health services.

WORKFORCE DEVELOPMENT AND EMPLOYMENT SERVICES

Special needs populations may also need workforce development and employment services. These programs may include employment navigation, job training, education, transportation services, and case management focused on employment, among others. As the public input mentioned, residents with special needs have numerous barriers to entering and remaining in the workforce. Providing specialized educational opportunities and employment opportunities could assist in reducing these barriers.

PHYSICAL AND MENTAL HEALTH AND TREATMENT SERVICES

Access to healthcare is a need for special needs populations, as they are more likely to experience barriers such as economic disadvantage; medical issues and disability; language and literacy age; and cultural, geographic, or social isolation. To increase access to healthcare, local governments and stakeholders need to take steps to define, locate, and reach at-risk populations and help to connect them to the available services in the area.

EDUCATION/COMBATING PERCEPTIONS

Combatting stigmas is an important concern for people with special needs. For adults with criminal histories and people living with HIV/AIDS, discrimination may make accessing adequate housing difficult. Further, a lack of understanding regarding the transmission of HIV may cause people to lose housing or employment, thus increasing the risk of homelessness.

SERVICE INFORMATION AND NAVIGATION

Connecting residents to available services was the number one concern received by public input efforts. Outreach to special needs populations incurs its own specialized needs because of the need for personalized assistance often required in navigating the services. The clarity in communicating which services are available, for whom, and how to access them is vital for increasing access for vulnerable populations. Outreach also includes the development of relationships and trust so that people feel comfortable seeking out needed services.

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

In the Denver-Aurora-Lakewood metropolitan area, an estimated 317 people were diagnosed with HIV in 2017, a rate of 13.1 per 100,000 population. An estimated 9,258 people were living with HIV at the end of 2016, a rate of 389.8 per 100,000 population.¹⁷

Of the 317 people newly diagnosed with HIV, 290 were adult and adolescent males (91.5% of new diagnoses), and 27 were adult and adolescent females (8.5%). Of the 9,258 people living with HIV, 8,179 were adult and adolescent males (88.3%), and 1,079 were adult and adolescent females (11.7%). For both males and females, residents aged 45 to 54 years were living with HIV at the highest rates (1,357.5 per and 191.6 per 100,000 population, respectively). Looking at prevalence by race and ethnicity, Black and African American residents were living with HIV at the highest rates (1,574.4 per 100,000 population for males and 714.9 per 100,000 population for females).¹⁸

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

Describe the jurisdiction's need for Public Facilities:

Buildings open to the public or for use by target special needs populations, whether owned by the government or by nonprofit organizations, may be considered public facilities under the CDBG program. Residents and stakeholders who participated in community meetings and interviews emphasized that public facility needs in Commerce City include homeless accommodations, walkability improvements, neighborhood improvements for safety and appearance, road improvements, land purchases for drainage purposes, a family wellness hub located in the core city, community gathering places, the development of park land, facilities for youth activities and competitive sports, and a resiliency center for gathering during emergencies.

Other plans recently completed for Commerce City identified the following public facility goals and opportunities:

- Irondale Neighborhood infrastructure improvements including drainage, roadways, and walkways;
- Connecting the new rail station to the surrounding community;

¹⁷ Centers for Disease Control and Prevention. (2017). Diagnoses of HIV Infection among Adults and Adolescents in Metropolitan Statistical Areas United States and Puerto Rico, 2017. Retrieved from: <https://www.cdc.gov/hiv/library/reports/hiv-surveillance.html>

¹⁸ Ibid.

- Providing interconnectivity within the City with bikeways, walkways, trails, bridges, tunnels, and alternative transportation;
- Reduction in tap fees and improved water softening;
- Improve access to health care facilities, programs, and human services;
- Build and maintain parks to enhance neighborhoods and meet current and future generation needs; and
- As recommended in the current Parks and Recreation Master Plans and other documents, create a system of outdoor civic spaces that are destinations for active travel.

How were these needs determined?

Commerce City's public facility needs were determined based on input from stakeholders engaged through interviews, focus groups, and community meetings (see Table 2 for a list of participating organizations). Needs were also determined based on a review of local plans, including the City of Commerce City C3 Vision Comprehensive Plan (2010), the 2019 Capital Improvement Projects Plan; Commerce City Station Area Master Plan (2013), the Irondale Neighborhood study (2015); the Economic Development Strategic Plan (2010), Walk.Bike.Fit Commerce City (2012), the City of Commerce City Housing Needs Assessment (2018), and the Commerce City Balanced Housing Plan and Commerce City Housing Authority Affordable Housing Implementation Plan (2018/2019) (see Table 3 for the full list of plans).

Describe the jurisdiction's need for Public Improvements:

Residents and stakeholders who participated in community meetings and interviews noted the need for public improvements in Commerce City, including:

- Signage and wayfinding for parks and greenways
- Investment in the core of the city where infrastructure tends to be older
- Benches and other street furniture
- Sidewalks
- Improved walkability including bridges and tunnels
- Wayfinding
- ADA accessibility
- Bus stops
- Lighting
- Infrastructure to reduce isolation
- Landscaping and beautification

- Median beautification
- Pocket parks
- Historic markers
- Shading/tree canopy on multiuse trails
- Painted bollards and other traffic calming measures
- Public art
- Local bike share that does not require a credit card or smartphone
- First/ last-mile transportation options
- Electric vehicle charging stations
- Upgrades to pedestrian tunnels
- Irondale infrastructure partnerships
- Addressing drainage and flooding issues
- Serving families with dry wells
- Water scarcity and balancing resources with anticipated population growth
- Low-income solar garden
- Transportation connections to downtown and employment; improving access to the new rail center
- Natural plantings around infrastructure; art around traffic control boxes
- Carbon monoxide detector giveaways
- Outdoor warning towers

Other plans recently completed for Commerce City detail goals for improving public infrastructure, including:

- Ensure neighborhood accessibility to all modes of travel;
- Strengthen existing neighborhoods through reinvestment and assistance with renewal efforts; and
- Promote regular physical activity by providing safe, convenient opportunities for recreation and human-powered travel.

How were these needs determined?

Public infrastructure needs in Commerce City were determined based on input from stakeholders engaged through interviews, focus groups, and community meetings (see Table 2 for a list of participating organizations). Needs were also determined based on a review of local plans, including the City of Commerce City C3 Vision Comprehensive Plan (2010), the 2019 Capital Improvement Projects Plan; Commerce City Station Area Master Plan (2013), the Irondale Neighborhood study (2015); the Economic Development Strategic Plan (2010), Walk.Bike.Fit Commerce City (2012), the City of Commerce City

Housing Needs Assessment (2018), and the Commerce City Balanced Housing Plan and Commerce City Housing Authority Affordable Housing Implementation Plan (2018/2019) (see Table 3 for the full list of plans).

Describe the jurisdiction's need for Public Services:

Public services are an important component of the City's community development strategy, and the City can spend up to 15% of its annual CDBG funding on public services over the next five years. Public service needs identified by meeting attendees and interview participants include:

- Community and resource navigation, including a physical resource directory accessible in print and online; a resource navigator; and for special needs care coordinators;
- Bilingual and undocumented resident assistance;
- Technology and broadband availability;
- Higher education, ESL, and workforce development;
- Basic needs and survival supplies and school supplies;
- Better access to health and mental health services;
- Domestic violence services;
- Childcare and senior care;
- Opportunities for youth to access resources;
- Programming in conjunction with school districts;
- Low-cost internet access;
- Support for nonprofits, specifically those applying a multi-generational approach to supporting the community;
- Neighborhood cleanups;
- Senior activities and services especially technology training and a resource navigator;
- Life skill training on finances, budgeting, taxes, self-care, etc.;
- Youth activities and mentoring, including a way for seniors and youth to come together to teach each other;
- Programs to increase literacy;

- Food assistance, food banks, community gardens, and other programs to address food insecurity;
- Access to healthy food - a holistic approach targeted to focus on patient-client experience;
- Bilingual and culturally meaningful services and support; information in multiple languages;
- Flexible support for families;
- Planning efforts that empower community voice;
- An adaptive rec center, including aquatics and water education programming and Partnering with organizations providing therapeutic recreation;
- Transportation assistance, including for accessing healthcare and transportation for seniors;
- Dual language book program for learning English and Spanish;
- Snow removal for seniors and people with disabilities;
- Citizen police academy and community engagement staff for the police department;
- Code enforcement;
- Bike tours to transit connection opportunities to increase community knowledge and traveling confidence;
- Promoting awareness of existing transportation resources; and
- Subsidized transportation to the new N-Line station (e.g., bus tickets).

Community plans also identified goals for the provision of public services in Commerce City, including:

- Promote regular physical activity by providing safe, convenient opportunities for recreation and human-powered travel;
- Improve access to health care facilities, programs, and human services;
- Encourage increased access to healthy foods for all residents;
- Increase year-round active recreation opportunities;
- Increase general educational options for life-long learning;

- Elevate high school graduation rates and technical training among area residents; and
- Increase local employer understanding and utilization of workforce development programs.

How were these needs determined?

Commerce City's public service needs were determined based on input from stakeholders engaged through interviews, focus groups, and community meetings (see Table 2 for a list of participating organizations). Needs were also determined based on a review of local plans, including the City of Commerce City C3 Vision Comprehensive Plan (2010), the 2019 Capital Improvement Projects Plan; Commerce City Station Area Master Plan (2013), the Irondale Neighborhood study (2015); the Economic Development Strategic Plan (2010), Walk.Bike.Fit Commerce City (2012), the City of Commerce City Housing Needs Assessment (2018), and the Commerce City Balanced Housing Plan and Commerce City Housing Authority Affordable Housing Implementation Plan (2018/2019) (see Table 3 for the full list of plans).

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

Housing choices are limited household income and wealth; however, a lack of affordable housing in an area may also create significant hardships for low- and moderate-income households. Households that spend more than 30% of their income on housing are considered 'housing cost burdened' and may have difficulty affording other necessities, such as food, clothing, health care, and childcare. Stakeholders and residents noted a need for additional housing units in Commerce City to meet the high demand for housing and increase housing affordability. Data examined in the following sections also show that home values and rents in the city have rapidly increased in recent years; there is a great shortage of affordable rental and for-sale housing in the city for residents with very low incomes; and a significant proportion of households are cost-burdened or severely cost-burdened by housing costs.

In addition to reviewing current housing market conditions, this section analyzes the availability of assisted and public housing and facilities to serve homeless individuals and families. It also analyzes local economic conditions and summarizes existing economic development resources and programs that may be used to address community and economic development needs identified in the Needs Assessment.

MA-10 Number Of Housing Units – 91.210(A)&(B)(2)

Introduction

There are 16,818 housing units in Commerce City, according to 2015-2019 Five-Year American Community Survey estimates. The largest share of units is single-family detached structures (78.7%), followed by single-family attached structures (7.6%) and small multifamily buildings of 5 to 19 units (5.4%). About 3.5% of the city's units are in duplexes, triplexes, and fourplexes. Units in large multifamily buildings (20 or more units) account for 2.7% of units, and mobile homes, boats, RVs, and vans account for 2.1%.

An estimated 12,084 units in Commerce City are owner-occupied (74.0%), and 4,248 are renter-occupied (26.0%). Almost all owned housing has at least two bedrooms: 12.0% has two bedrooms and 87.0% has three or more bedrooms. Rental units tend to be smaller: 15.2% of units are one-bedroom units, and 2.1% have no bedrooms. The most common rental units contain three or more bedrooms (43.9%) or two bedrooms (38.8%).

All residential properties by number of units

Table 26. Residential Properties by Unit Number

Property Type	Number	%
1-unit detached structure	13,232	78.7%
1-unit, attached structure	1,275	7.6%
2-4 units	590	3.5%
5-19 units	902	5.4%
20 or more units	459	2.7%
Mobile Home, boat, RV, van, etc.	360	2.1%
Total	16,818	100%

Data Source: 2015-2019 ACS

Unit Size by Tenure

Table 27. Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	10	0.1%	89	2.1%
1 bedroom	109	0.9%	644	15.2%
2 bedrooms	1,447	12.0%	1,650	38.8%
3 or more bedrooms	10,518	87.0%	1,865	43.9%
Total	12,084	100%	4,248	100%

Data Source: 2015-2019 ACS

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

Maiker Housing Partners administers about 1,519 vouchers in Adams County, and the Commerce City Housing Authority administers about 110 vouchers in the county. In Adams County, nearly 70% of family households that receive assisted housing are minority households. An estimated 20% are households with a disability.

According to HUD's Low Income Housing Tax Credit (LIHTC) database, there are also five tax credit properties in Commerce City that provide about 585 units of housing affordable to households with incomes at or below 60% AML.

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

Several trends exist that, absent policies focused on preserving the city's existing affordable housing stock and developing diverse new housing options, indicate that Commerce City will continue to experience a loss of affordable housing inventory. Trends include:

- High levels of demand for housing due to economic opportunities and increasing population in the city and region;
- A shortage in the supply of rental units affordable to households with incomes below 30% HAMFI and homeowner housing units affordable to households with incomes below 50% HAMFI;
- Increasing home values and median rents over the past 10 years;
- Development of new housing that has not kept up with high demand due in part to high costs of new development and the associated need for subsidies for the development of new affordable housing; and
- Aging housing stock in need of rehabilitation.

Federal law requires any LIHTC properties awarded credits after 1989 to maintain affordability for 30 years, although after the first 15 years, owners can leave the program through a relief process. After 30 years (or 15 years if owners are granted regulatory relief), properties can be converted to market-rate units. During the 2021-2025 Five-Year Consolidated Plan, six LIHTC properties in Commerce City will pass 15 years in the LIHTC program. Together these properties have about 490 income-restricted units.

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

Cost burden data shows that housing affordability needs are particularly severe for renters with incomes under 80% of HUD Area Median Family Income (HAMFI), and in particular for those with incomes under 30% HAMFI. An estimated 1,674 renter households with incomes below 80% HAMFI are housing cost-burdened, spending more than 30% of income on housing, or severely housing cost-burdened, spending more than 50% of income on housing (see Table 5). Renters with incomes of 30% HAMFI and below make up 55.3% of these cost-burdened renter households.

On the ownership side, income and home value data indicate that starter home prices in the city are out of reach for many moderate- and middle-income households. Based on the American Community Survey 5-Year Estimates for 2015-2019, the median home value of owner-occupied units in Commerce City is \$320,100, up 50.6% from the 2005-

2009 median of \$212,600. Affordability data in the Needs Assessment also shows affordability challenges, with cost burdens impacting households with incomes up to 100% HAMFI. Stakeholders interviewed during this planning process also described an increasingly tight housing market due to high demand for housing and insufficient new housing under development, noting the need to increase the supply of housing for both rental and homeownership units to support housing affordability in the city. In addition to the need to increase housing supply, stakeholders noted the need to assist property owners in making needed repairs to housing units to support housing affordability and quality.

Describe the need for specific types of housing:

Data discussed in the Housing Need Assessment and this section indicate a particular need for rental and for-sale housing that is affordable to low- and moderate-income households. Housing types that allow for increased affordability of both rental and homeownership units might include options such as smaller housing units; multifamily 'missing middle housing, including duplexes, triplexes, quadruplexes, and other small multifamily units; accessory dwelling units; cohousing with shared services; or tiny homes.

Rehabilitation of existing affordable housing stock is also a need, as stakeholders noted that owner-occupied housing affordable to households at or below 50% AMI may be in poor condition. Rehabbing units that are aging or dilapidated or that have poor energy efficiency can increase the number of high-quality affordable units.

MA-15 Housing Market Analysis: Cost Of Housing - 91.210(A)

Introduction

Data on housing costs and affordability in Commerce City show trends of increasing rents and home values, and a need for an increase in housing supply--particularly in units affordable to residents with incomes below 30 to 50% HAMFI.

The city's median home value is estimated at \$320,100 according to 2011-2015 ACS data, up 50.6% from the 2005-2009 ACS estimate of \$212,600 (see Table 35). Home values in Commerce City stagnated during the years following the 2008 recession but have since increased, particularly in the years following the 2011-2015 five-year estimates. These findings align with stakeholder input that home prices in Commerce City have increased significantly in recent years.

Median contract rent in the city was \$1,102 as of the 2015-2019 ACS, a 58.8% increase from the 2005-2009 estimate of \$694. ACS data shows that 7.4% of the city's rental units rent for under \$500 per month, and 33.4% have rents between \$500 and \$999 per month.

Rental rates are \$1,000 to \$1,499 for 35.6% of units, and \$1,500 or more for 23.6% of units. Rents in the city have increased more rapidly in recent years, particularly in the years following the 2012-2016 five-year estimates.

Stakeholders emphasized that the greatest affordable housing needs in the city include the development of new housing--particularly units affordable to households with incomes under 30% to 50% HAMFI--and rehabilitation and weatherization of existing units. Housing affordability is often an especially acute issue for people who are homeless, people with disabilities, people living with HIV/AIDS, seniors, and people re-entering the community from long-term care facilities or other institutions.

Cost of Housing

Table 28. Cost of Housing

	Base Year: 2009	Most Recent Year: 2015-19	% Change
Median Home Value	\$212,600	\$320,100	50.6%
Median Contract Rent	\$694	\$1,102	58.8%

Data Source: 2005-2009 ACS (Base Year), 2015-2019 ACS (Most Recent Year)

Table 29. Rent Paid

Rent Paid	Number	%
Less than \$500	307	7.4%
\$500-999	1,379	33.4%
\$1,000-1,499	1,468	35.6%
\$1,500-1,999	609	14.8%
\$2,000 or more	365	8.8%
Total	4,128	100.3%

Data Source: 2015-2019 ACS (Median contract rent for units with cash rent)

Housing Affordability

Table 30. Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	380	No Data
50% HAMFI	1,195	925
80% HAMFI	2,755	2,464
100% HAMFI	No Data	4,267
Total	4,330	7,656

Data Source: 2011-2015 CHAS

Monthly Rent

Table 31. Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$1,179	\$1,304	\$1,605	\$2,186	\$2,486
High HOME Rent	\$1,114	\$1,199	\$1,441	\$1,656	\$1,828
Low HOME Rent	\$875	\$937	\$1,125	\$1,300	\$1,450

Data Source: HUD FMR (2021) and HOME Rents (2020)

Is there sufficient housing for households at all income levels?

Table 30 estimates the number of units affordable to renters and owners in Commerce City at a variety of income levels. This data can be compared to the number of households at each income level, as provided in Table 6 of the Needs Assessment.

According to CHAS estimates, there are 1,260 renter households with incomes under 30% HAMFI in the city but only 380 rental units affordable at that income level (see Table 30). Thus, there is insufficient rental housing for households with extremely low incomes. There appear to be a sufficient number of rental units affordable to renter households at the other income levels, although data is not available regarding the number of units available for households with incomes above 80% HAMFI. These figures do not take into account unit condition or size; nor do they reflect the possibility that a unit that would be affordable to a low- or moderate-income household may be unavailable to them because it is occupied by a higher-income household.

Turning to owners, there are an estimated 1,595 owner households with incomes 50% HAMFI and below in the city, and 925 owner-occupied housing units affordable at that income level (see Table 30). At income levels above 50% HAMFI, there appears to be an adequate number of affordable units. As with rental housing, these figures do not take into account housing size or condition, or the possibility that higher-income households will choose to occupy lower-cost units.

The National Low Income Housing Coalition's Out of Reach data examines rents relative to income levels for counties and metro areas throughout the U.S. using HUD Fair Market Rents. Fair Market Rent (FMR) is a standard set by HUD at the county or regional level for use in administering its Section 8 rental voucher program. FMRs are typically the 40th percentile gross rent (i.e., rent plus utility costs) for typical, non-substandard rental units in the local housing market. To afford a two-bedroom rental unit at the Adams County 2020 FMR of \$1,566 without being cost-burdened would require an annual income of \$62,640.

This amount translates to a 40-hour work week at an hourly wage of \$30.12, a 100-hour work week at minimum wage, or a 69-hour work week at the county's mean renter wage of \$17.35. A three-bedroom unit at the FMR of \$2,163 would require an annual wage of \$86,520.

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

The median home value in Commerce City increased by 50.6% from the 2005-2009 ACS to the 2015-2019 ACS, and median rent increased by 58.8%. While home values and rents stagnated in the period following the 2008 recession, both have increased sharply in recent years. Affordability has, in turn, decreased, particularly for renters. High demand for housing, development of new housing that has not kept up with high demand, and a lack of rental and for-sale housing affordable to residents with incomes less than 30% to 50% HAMFI all indicate that housing affordability is likely to continue as a pressing issue in Commerce City.

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

Table 31 above shows HUD Fair Market Rents and HOME rents for Adams County. The county's median contract rent of \$1,102 (2015-2019 ACS) is similar to the FMR and high HOME rents for efficiency units. As of the 2015-2019 ACS data, about 40.8% of rental units in Commerce City have rents under \$1,000 which falls under the FMR and HOME rents for all unit sizes. About 76.4% of units have rent less than \$1,500, which falls under the FMR for two-bedroom units and the high HOME rents for three-bedroom units. As noted in the previous section, about 53% of rental units have two bedrooms or fewer, and about 47% have three or more bedrooms. Combined, these figures suggest that housing choice voucher holders would be able to access a variety of units, given the share of housing renting for less than FMRs.

Note that this data does not reflect housing conditions, which is an important consideration. While the rent may be affordable, substandard housing conditions may make a unit unsafe or lead to exceptionally high utility costs, negating any savings in rent as compared to a more expensive unit. Additionally, housing choice voucher holders may have difficulty finding units that will accept vouchers or difficulty qualifying for leases due to past evictions or credit history.

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 selected housing conditions: 1) lack of complete plumbing facilities, (2) lack of 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, vacancy rate and suitability of vacant housing for rehabilitation, and the risk of lead-based paint hazards.

Renters in Commerce City are more likely than owners to experience one or more of the selected housing conditions. About 52.1% of renter-occupied units and 31.8% of owner-occupied units have at least one of the conditions described above (see Table 36). CHAS data discussed in the Needs Assessment indicates that cost burdens are by far the most common housing condition. About 29.5% of owner-occupied units in the city have one selected condition (3,085 units), and about 2.2 % have two selected conditions (235 units). In contrast, 44.4% of renter-occupied units have one selected condition (1,885 units), and 16.2% have two or more selected conditions (330 units). No owner-occupied units and less than 1% of renter-occupied units (25 units) have three or more conditions. These figures indicate that rental units are more likely to be physically substandard (i.e., lack a complete kitchen or plumbing).

Age of housing reflects periods of development in Commerce City. The area contains a significant supply of housing built before 1980, of which 3,059 units are owner-occupied (25.3% of owner-occupied units) and 2,163 are rental units (50.9% of rental units) (see Table 33). Owner-occupied units are more likely than rental units to have been built in 1980 or later (74.7% and 49.1%, respectively), while renters are more likely than owners to occupy housing built before 1980. While some older units may be well-maintained, the considerable share of housing built before 1980 indicates a potential need for rehabilitation assistance.

Definitions

For this Consolidated Plan, the City of Commerce City defines units to be in "standard condition" if they meet HUD Section 8 housing quality standards. A unit is defined as "substandard" if it lacks complete plumbing, a complete kitchen, or heating fuel (or uses heating fuel that is wood, kerosene, or coal). A unit is "substandard but suitable for rehabilitation" if it lacks complete plumbing, a complete kitchen, or a reliable and safe heating system but has some limited infrastructure that can be improved upon. These units are likely to have deferred maintenance and may have some structural damage

such as leaking roofs, deteriorated interior surfaces, and inadequate insulation. They may not be part of public water or sewer systems but have sufficient systems to allow for clean water and adequate waste disposal.

Condition of Units

Table 32. Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	3,085	30%	1,885	44%
With two selected Conditions	235	2%	305	7%
With three selected Conditions	0	0%	25	1%
With four selected Conditions	0	0%	0	0%
No selected Conditions	7,135	68%	2,035	48%
Total	10,455	100%	4,250	100%

Data Source: 2011-2015 ACS

Year Unit Built

Table 33. Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	8,199	67.9%	1,379	32.5%
1980-1999	826	6.8%	706	16.6%
1950-1979	2,696	22.3%	1,996	47.0%
Before 1950	363	3.0%	167	3.9%
Total	12,084	100%	4,248	100%

Data Source: 2015-2019 ACS

Risk of Lead-Based Paint Hazard

Table 34. Risk of Lead-Based Paint

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	2,961	27.7%	2,354	51.7%
Housing Units build before 1980 with children present	535	5.0%	805	17.7%

Data Source: 2013-2017 ACS (Total Units) 2013-2017 CHAS (Units with Children present)

Vacant Units

Table 35. Vacant Units

	Number	Percent
For rent	155	31.9%
For sale	33	6.8%
Rented or sold but not occupied	44	9.1%
For seasonal, recreational, or occasional use	40	8.2%
Other vacancies	214	44.0%
Total	486	100%

Data Source: 2015-2019 ACS

Need for Owner and Rental Rehabilitation

While data on housing condition and age points to low levels of substandard owner-occupied housing in Commerce City, the large numbers of owner-occupied housing units built before 1980 and 1950 indicate that housing maintenance and rehabilitation may be needs for low-income homeowners. Data regarding housing conditions indicates that 235 owner-occupied units (about 2.2% of total owner-occupied units) in Commerce City have at least two housing conditions (likely including cost burden and one other condition), and data in the Housing Needs Assessment shows that owner households in Commerce City tend to experience the housing problems of overcrowding and cost burdens rather than lack of complete plumbing or kitchen facilities.

While the number of owner-occupied housing units with two or more selected conditions is relatively low, 363 owner-occupied housing units (3.0% of all owner-occupied units) in the city were built before 1950, indicating the highest risk for deferred maintenance and rehabilitation need. About 2,696 units of owner-occupied housing units in Commerce City (22.3%) were built between 1950 and 1980, and as this housing ages, maintenance needs will continue to grow. This data on housing age in Commerce City indicates that some owner-occupied units are at risk of deferred maintenance and may currently or soon need some rehabilitation. Additionally, seniors living on Social Security or retirement income who have paid off their mortgages may be unable to afford necessary repairs and maintenance as their homes age.

Community input from stakeholders and residents also indicates that owner-occupied housing rehabilitation is a need in Commerce City. Rehabilitation and home improvement needs described by residents and stakeholders included general repairs,

weatherization, energy efficiency improvements, and modifications for people with disabilities or trauma-informed design.

Data on the city's housing stock show that rental units may be in greater need of rehabilitation than owner-occupied units. An estimated 3.9% of rental housing units in the city (167 units) were built before 1950, and 47.0% of units were built between 1950 and 1980 (1,996 rental units). Further, a larger number and share of rental units (330, or 7.8%) than owner units (235, or 2.2%) have at least two housing conditions, likely including cost burdens and at least one other housing condition. Combined, these factors indicate that while there is a high level of need for rehabilitation of both renter- and owner-occupied housing, renters in Commerce City experience the highest levels of need.

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, and exposure to lead may cause a range of health problems for adults and children. The major source of lead exposure comes from lead-contaminated dust found in deteriorating buildings, including residential properties built before 1978 that contain lead-based paint.

Unfortunately, measuring the exact number of housing units with lead-based paint hazards is difficult. However, risk factors for exposure to lead include housing old enough to have been initially painted with lead-based paint (i.e., pre-1978), households that include young children, and households in poverty. Table 34 identifies the total number of housing units in Commerce City built before 1980 and the total number of renter and owner units built before 1980 that house children under age 6. This includes 535 owner-occupied units (5.0% of all owner-occupied housing units) and 805 renter-occupied units (17.7% of total renter-occupied housing units) with at least two risk factors for exposure to lead-based paint (built before 1980 and housing young children).

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

Introduction

The needs of public housing residents and vouchers holders are different from those of the county's overall low- and moderate-income population primarily in that these residents are housing in stable and decent housing. With this need met, residents can work on other needs that families typically face in addition to housing insecurity. These other needs frequently include childcare, healthcare, employment, transportation, and food.

Totals Number of Units

Table 36. Total Number of Units by Program Type

	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

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

Maiker Housing Partners owns one low-income housing development, the Casa Redondo de Vigil apartments. This 42-unit development serves seniors aged 62 and over. MHP is in the process of demolishing or disposing the development through the Section 18 program.

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:

Casa Redondo de Vigil is the county's only remaining traditional public housing development. The development has 42 units serving seniors aged 62 and over. Maiker Housing Partners has made ongoing improvements to the property over the last five years. MHP's 2018 Annual Report also indicates that the Casa Redondo clubhouse and office were remodeled in 2018, providing upgrades to resident meeting spaces. The MHP 2020-2025 PHA Plan also indicates several capital improvements, including the reconfiguration of cabinets and countertops in the kitchen and replacement of all kitchen appliances. The capital fund report also indicated landscape improvements at the site. These activities were completed by June 30, 2019.

Public Housing Condition

Table 37. Public Housing Condition

Public Housing Development	Average Inspection Score
Maiker Housing Partners, Casa Redondo de Vigil, 1080 W. 69 th Avenue	88

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

MHP is currently in the process of applying to the Section 18 program to demolish or dispose of the Casa Redondo de Vigil development. No additional restoration or revitalization activities have been identified.

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

In 2017, MHP offered smoking cessation coaching and community engagement activities to Casa Redondo residents as the development adopted a smoke-free environment. Through its Family and Community Vitality program, MHP has also helped residents create member-run community gardens.

Discussion:

In the coming years, Maiker Housing Partners plans to dispose of its last remaining traditional public housing development, Casa Redondo. MHP continues to increase other affordable housing programs such as the Low Income Housing Tax Credit program and housing choice vouchers. LIHTC and other affordable housing programs using housing choice vouchers are also provided in Commerce City through the Commerce City Housing Authority.

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

Introduction

A small range of facilities provide housing and services to support people experiencing homelessness in Commerce City and the region, including emergency, transitional, and permanent supportive housing. Using data from the Metropolitan Denver Continuum of Care, stakeholder interviews, and community input sessions, this section provides an overview of shelter facilities, housing, and mainstream and other services that aim to meet the needs of people experiencing homelessness in Commerce City.

Facilities and Housing Targeted to Homeless Households

There is only one facility in Commerce City serving people experiencing homelessness. This facility, Access Housing, provides eight 2-bedroom apartments for homeless families. Currently, two of the units are uninhabitable due to plumbing issues. In 2020, Access Housing sold two properties totaling 16 transitional housing units to the private sector. In Northglenn, a neighboring city, Cold Weather Care offers up to 12 seasonal beds for Commerce City but has provided up to 20 beds in past years.

Table 38. 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 2-bedroom Apartments	12	0	0	0
Households with Only Adults	0		0	0	0
Chronically Homeless Households	N/A		0	0	0
Veterans	0		0	0	0
Unaccompanied Youth	0		0	0	0

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

A variety of services target people experiencing homelessness in Commerce City. Examples of health, mental health, employment, and other services that complement services targeted to people experiencing homelessness in Commerce City include:

- In April 2021, the City hired a full-time Homeless Navigator. She will provide outreach, information, basic supplies, and basic on-site services for the homeless and homeless encampment(s) in the City. The 2021 Annual Action Plan draft awards \$10,000 in CDBG public service funding to purchase some of the supplies and services.
- Kids in Need of Dental (KIND), a CDBG funding recipient, provides pediatric dental services in Commerce City. No patient is turned away and they are one of the few dental providers in Colorado that will accept Medicaid patients and/or pay on a sliding scale discount program.
- Commerce City Community Campus - a hub for neighborhood wellness, will open in 2021. It will contain numerous health and social services offices in one location including Cultivando, Front Range Clinic, Kids First Health Care, KIND, Colorado Orthodontic Foundation, Women, Infants, & Children (WIC), Early Childhood Partnership of Adams County (ECPAC), A Precious Child, and Tri-County Health

Department. This innovative campus was formed to serve low-income families and underserved residents in the City and region.

- Salud Family Health Center has a clinic located in the Core City. They provide medical, dental, pharmacy, and behavioral health care services, and offer a sliding scale discount program, among other payment options.
- A Precious Child provides wrap-around service navigation for residents and the homeless in need. Soon they will open a free store at the C4 medical campus that opens in 2021. APC coordinates with the local school districts' homeless liaisons to provide services and supplies to homeless families.
- Anythink Library in Commerce City provides bi-lingual job search and application assistance, a computer lab with ADA-accessible workstations, a free lunch program, and children and teen areas.
- A new chapter of Saint Vincent de Paul opened in Commerce City in early 2020. They offer service navigation, short-term emergency housing funds, food, clothing, and general counseling.
- Almost Home provides a small homeless shelter, emergency hotel vouchers, and supporting service coordination in the neighboring City of Brighton.
- Adams County is a member of the Metro Denver Homeless Initiative (MDHI). MDHI is an independently funded, non-profit organization whose mission includes the prevention and ending of homelessness in the seven-county, Metro Denver Region. Individuals and families may access their services throughout Adams County at a variety of agencies and facilities that coordinate with the larger continuum of care.
- The Adams County Workforce and Business Center provides career development, training, and education, assistance for job seekers, youth programs, and other employment services.
- Growing Home in nearby Westminster offers homelessness prevention, a home-visitation program for children prenatal through age 5, and a 10-week class for new and expecting parents focused on healthy child development.
- Catholic Charities of Denver offers early childhood education programs, counseling, women's health services, emergency assistance, senior services, and immigration services, among other programs.
- Star Girlz Empowerment in the nearby City of Aurora, provides mentoring, transitional housing, career exploration, personal development, mental health

services, and other opportunities for girls and women aged 10 to 25. They also support girls and young women transition out of human trafficking.

- The Metropolitan Denver Continuum of Care focuses on supporting coordination and collaboration among these systems so that people experiencing homelessness can access mainstream resources to assist them in transitioning to and remaining stable in permanent housing.

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.

Multiple organizations in and around Commerce City provide emergency or transitional shelter and supportive services for people experiencing homelessness:

- Commerce City's Police Department operates a Victim Services Division (VS). The CDBG program supports homelessness prevention through VS's Domestic Violence Victim Services (DVV). For reported domestic violence cases, residents and their families can receive temporary emergency support including hotel stays, moving expenses, rent, mortgage, utility payments, food, pet care, and phones.
- Access Housing provides eight emergency, short-term, 2-bedroom apartments for homeless families. Currently two of the units are uninhabitable due to plumbing issues. In 2020, Access Housing sold two properties totaling 16 transitional housing units to the private sector.
- Cold Weather Care in nearby Westminster provides emergency shelter, meals, support, and case management to residents experiencing homelessness during the cold months from October to April.
- Almost Home in nearby Brighton provides emergency shelter, emergency assistance, motel vouchers during periods of severe weather, case management, and re-housing assistance.
- Comitis Crisis Center in Aurora provides emergency shelter for adults experiencing homelessness. They have a lottery line and provide meals, clothing, showers, case management, and supportive services. They provide emergency and transitional family and single veteran shelters offering similar services. During cold weather, they operate a Day Resource Center.

- Growing Home in nearby Westminster operates 18 affordable housing units as well as two transformational units in which participants receive reduced rent and monthly case management support while attending school.
- Maiker Housing Partners provides housing vouchers, affordable housing, and rent and utility assistance in Adams County.

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

Introduction

This section describes the housing and social service needs of specific populations, including the elderly and frail elderly, people with disabilities, residents with a diagnosis of HIV/AIDS, residents with substance use or mental health disorders, and survivors of domestic violence.

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 Elderly and People with Disabilities

Most seniors desire to age in place but may need accessibility modifications and other safety renovations as they age. Additional support services to maintain their home and property such as snow shoveling, lawn care, and exterior painting will also be needed. Services and home improvements that reduce the financial burdens of home ownership for the elderly and people with disabilities will also help them age in place.

The elderly and people with disabilities need housing close to or that provides access to transit or transportation services to facilitate access to health care, resources, basic goods, and/or employment. Access to these needs should be primary considerations in the location of supportive housing for seniors and people with disabilities. Supportive services for the elderly and people with disabilities may include health services, assistive technologies, independent living support, and educational assistance and planning for children with disabilities.¹⁹ People with intellectual and developmental disabilities may also need case management or life skills programming. Housing should focus on integrating these populations into the community and reducing social isolation through programming and facilitating access to resources and services.

¹⁹ Centers for Disease Control and Prevention. (n.d.) Disability and health information for people with disabilities. Retrieved from: <https://www.cdc.gov/ncbddd/disabilityandhealth/people.html>

People with Substance Use Disorders

People with alcohol or other substance use disorders need services including screening, diagnosis, assessment, and treatment. People recovering from these disorders likely need recovery supportive services, including clinical case management, support groups, housing, and transportation assistance, mental health services, family engagement, behavioral therapy, and vocational and education, childcare, financial, and health services.²⁰ Transitional housing may also be required.

People Living with HIV/AIDS

Low-barrier housing free from requirements such as those surrounding drug testing, sobriety, criminal background, and medical appointments is a primary need for people living with HIV/AIDS. A 'Housing First' model, in which housing is provided without these kinds of barriers, increases access to housing and reduces the risk of homelessness for people living with HIV/AIDS. Like other special needs populations, people living with HIV/AIDS need housing that provides easy access to health services, resources, and employment. This population may need case management services; however, the Housing First model emphasizes that support services should not be required for people living with HIV/AIDS to access housing. In addition to low-barrier housing, people living with HIV/AIDS may need a variety of services, including access to core medical services, as well as supportive services, including childcare services, medical transportation, and non-medical case management, among others.²¹

Public Housing Residents

Public housing residents often need support services such as case management and long-term follow-up; employment services, including transitional jobs, job-search assistance, sector-based job training, work-related childcare support, and continuing technical and professional education; programs that teach financial literacy; and housing counseling.

Some public housing residents need more intensive case management, workforce education, and financial education. They may benefit from integrated supportive housing where small numbers of permanent family-supportive housing units are incorporated into mixed-income developments and case management and services

²⁰ Rural Health Information Hub. (n.d.) Treatment and Recovery Support Services. Retrieved from: <https://www.ruralhealthinfo.org/toolkits/substance-abuse/1/support-services>

²¹ Health Resources and Services Administration. (n.d.). Get HIV Care and Treatment. Retrieved from: <https://hab.hrsa.gov/get-care/get-hiv-care>

are provided on-site. Vouchers with wraparound services provide an alternative model in which case managers support voucher-holders with the same services delivered in permanent supportive housing. Incentives models may also support families in moving toward self-sufficiency by providing rewards for achievements, such as paying rent on time, getting their children to school, applying for a job, and volunteering.

Finally, some public housing residents--particularly those with serious physical and mental health disabilities--may have greater supportive service needs, such as assisted living (meals, housekeeping, activities, health care, case management, grocery store access) and on-site services, including parenting support, childcare, and after-school services for those who have custody of children or grandchildren.²²

Survivors of Domestic Violence

The greatest need for survivors of domestic violence is access to safe and affordable housing. Transitional housing options may also provide supportive services such as counseling, childcare, transportation, life skills, education, and job training for up to 24 months, providing survivors time and services to obtain safety and stability.²³ Temporary care has proven to assist City resident survivors in rapidly finding new accommodations or remaining in their current home.

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

People with mental health and substance abuse disorders often require supportive housing following discharge from inpatient treatment to reduce the risk of homelessness. People returning from these institutions need access to affordable housing and health services and may also require support services such as case management and transportation assistance. Permanent supportive housing should be affordable, close to needed health services, and accessible to transportation options. In Commerce City, the following programs provide case management to connect residents with housing and supportive services:

- Access Housing provides transitional housing with case management to connect residents with housing, employment, mental and physical health, and other relevant referrals.

²² Theodos, B., Popkin, S. J., Parilla, J., & Getsinger, L. (2012). The challenge of targeting services: a typology of public-housing residents. *Social Service Review*, 86(3), 517-544.

²³ Rogers, L. (2019). Transitional housing programs and empowering survivors of domestic violence. Retrieved from: <https://www.justice.gov/ovw/blog/transitional-housing-programs-and-empowering-survivors-domestic-violence>

- Almost Home provides supportive housing, home-based case management services, short-term rental assistance, and a Housing Navigation Center to connect residents with permanent housing.
- A Precious Child provides wrap-around service navigation for residents and the homeless in need. Soon they will open a free store at the C4 medical campus that opens in 2021. APC coordinates with the local school districts' homeless liaisons to provide services and supplies to homeless families.

In addition to these programs, low-cost health and mental health services are available for residents through Salud Family Health Centers, which offers a sliding-scale discount program based on family size and income.

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. 91.315(e)

Commerce City's first-year Annual Action Plan specifies the activities it plans to support during the 2021 program year to address housing and/or supportive service needs. These include:

- Domestic Violence Victim Support
- A Precious Child – Family Support
- Kids In Need of Dentistry (KIND)
- Minor Home Repair Program
- Paint-a-Thon
- ADA Fitness Court
- Continue AIN
- Coordinating services

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's first-year Annual Action Plan specifies the activities it plans to support during the 2021 program year to address housing and/or supportive service needs. These include:

- Joining the Adams County HOME Consortium
- Minor Home Repair Program
- Continuing ACW
- Seeking a new weatherization partner
- Coordinating services

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

During the public engagement process, participants identified several public policies that harmed the development of affordable housing. One barrier noted by participants was the South Adams County Water & Sewer District's (SACWSD) water and wastewater tap fees, which participants described as adding significantly to the final costs of new residential development. As of May of 2021, SACWSD's single-family home's tap fees totaled \$23,500. Overall, SACWSD fees have increased in both 2020 and 2021 to cover debt service on district bonds.

In 2020, SACWSD's connection fees increased by \$70 per residential unit or 3.5%. A December 2020 study recommended additional increases to the water connection fee, which totaled \$2,368 per unit or an increase of 16% from the 2020 fee. Wastewater connection fees were proposed to increase by \$1,007, or 14% from 2020. Participants also noted that water softening systems were an additional cost for new residential development.

A second barrier to the development of affordable housing was the city's development review process. Participants stated that although the city offered expedited plan review, the length of the review period often failed to meet the participants' expectations. Participants noted that improved stability and coordination among staff would improve the development process.

Participants identified the difficulty of the rezoning process as the third barrier to affordable housing development. Developers noted that it was difficult to rezone property for multifamily use due to pushback from members of the community. One participant noted that stereotypes about affordable housing played a major role in preventing developers from rezoning property to allow multifamily uses.

Attracting affordable housing developers is the fourth barrier. Reducing time delay risks in the plan review and inspection processes and promoting financial packaging for development should be improved to make the City more attractive and competitive.

MA-45 Non-Housing Community Development Assets – 91.215 (F)

Introduction

This section outlines employment, labor force, and educational attainment data that informs the Consolidated Plan's priorities and goals.

Economic Development Market Analysis

Business Activity

Table 39. Business Activity in Commerce City

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	557	1,388	2.1%	4.0%	-1.9%
Arts, Entertainment, Accommodations	2,107	1,251	8.0%	3.6%	-4.4%
Construction	3,188	5,536	12.1%	15.8%	3.7%
Education and Health Care Services	4,656	1,866	17.6%	5.3%	-12.3%
Finance, Insurance, and Real Estate	1,513	948	5.7%	2.7%	-3.0%
Information	621	58	2.4%	0.2%	-2.2%
Manufacturing	1,969	2,971	7.5%	8.5%	1.0%
Other Services	1,199	977	4.5%	2.8%	-1.8%
Professional, Scientific, Management Services, and Administrative and Waste Management Services	2,901	2,777	11.0%	7.9%	-3.1%
Public Administration	1,163	793	4.4%	2.3%	-2.1%
Retail Trade	3,106	2,137	11.8%	6.1%	-5.7%
Transportation and Warehousing, and Utilities	2,387	10,702	9.0%	30.6%	21.5%
Wholesale Trade	1,028	3,556	3.9%	10.2%	6.3%
Total	26,395	35,018	--	--	--

Data Source: 2014-2018 ACS (Workers), 2018 Longitudinal Employer-Household Dynamics (Jobs)

Labor Force

Table 40. Labor Force

Total Population in the Civilian Labor Force	28,963
Civilian Employed Population 16 years and over	27,689
Unemployment Rate	4.4%
Unemployment Rate for Ages 16-24	7.7%
Unemployment Rate for Ages 25-65	4.1%

Data Source: 2015-2019 ACS

Table 41. Occupations by Sector

Occupations by Sector	Number of People
Management, business and financial	4,165
Farming, fisheries and forestry occupations	1,045
Service	2,575
Sales and office	5,805
Construction, extraction, maintenance and repair	3,195
Production, transportation and material moving	1,975

Data Source: 2011-2015 ACS

Travel Time

Table 42. Travel Time

Travel Time	Number	Percentage
< 30 Minutes	13,018	50.5%
30-59 Minutes	10,123	39.2%
60 or More Minutes	2,651	10.3%
Total	25,792	100%

Data Source: 2015-2019 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Table 43. Educational Attainment by Employment Status

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	3,178	357	1,566
High school graduate (includes equivalency)	6,305	408	1,960
Some college or Associate's degree	7,418	299	1,082
Bachelor's degree or higher	6,128	187	602

Data Source: 2015-2019 ACS

Educational Attainment by Age

Table 44. Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	19	276	657	1,074	590
9th to 12th grade, no diploma	664	1,074	909	1,111	559
High school graduate, GED, or alternative	1,682	3,129	2,092	3,451	1,232
Some college, no degree	1,426	1,509	2,332	2,440	904
Associate's degree	189	856	736	927	385
Bachelor's degree	140	1,503	1,567	1,738	341
Graduate or professional degree	7	407	954	747	185

Data Source: 2015-2019 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Table 45. Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$30,731
High school graduate (includes equivalency)	\$36,622
Some college or Associate's degree	\$46,901
Bachelor's degree	\$54,444
Graduate or professional degree	\$64,443

Data Source: 2015-2019 ACS

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

The employment sectors in Commerce City with the largest numbers of jobs are transportation and warehousing (10,702 jobs or 30.6% of all jobs); construction (5,536 jobs or 15.8%); wholesale trade (3,556 jobs or 10.2%); and manufacturing (2,971 jobs or 8.5%).

The jobs in which most city residents are employed reflect a wider range of employment sectors. The largest shares of Commerce City residents are employed in education and health care services (4,656 workers or 17.6% of all workers); construction (3,188 workers or 12.1%); retail trade (3,106 workers or 11.8%); and professional, scientific, management services (2,109 workers, or 10%).

The largest mismatches between the share of workers (i.e., employed residents) and the share of jobs by sector are in transportation and warehousing and education and health care services. Transportation and warehousing workers make up a smaller proportion of workers living in Commerce City than do transportation and warehousing jobs of city's jobs (9.0% and 30.6%, respectively). This difference indicates that many jobs in the transportation and warehousing sector in Commerce City are filled by workers who live outside of the city. In contrast, education and health care services workers make up a larger proportion of workers living in Commerce City than do education and health care jobs of city's jobs (17.6% and 5.3%, respectively). This difference indicates that many workers in the education and health care sector may live in Commerce City and commute to jobs in other parts of the Denver metropolitan area. Differences between the share of workers and share of jobs by sector are about six percentage points or less in all other sectors.

Describe the workforce and infrastructure needs of the business community:

The Regional Economic Strategy for the Denver Regional Council of Governments (2014) notes several issues relating to the workforce and infrastructure needs of the business community, including:

The Regional Economic Strategy for the Denver Regional Council of Governments (2014) notes several issues relating to the workforce and infrastructure needs of the business community, including:

- Reliable transportation for employees is a need. Lack of transportation to work can be a major impediment to employees securing and maintaining employment.

- Last-mile transportation options are important for providing connections to employment. A lack of transportation from housing and employment to transit stations impedes obtaining and maintaining employment.
- Education levels, high school completion rates, and school quality in the Denver metropolitan area vary by income, race and ethnicity, and geographic area. There is a need to support educational attainment and access to job training, particularly in areas of the metro with lower levels of educational attainment.
- There is a need to increase information about workforce development programs and navigating employment, particularly for low-income residents.
- Poverty in the Denver metropolitan area is shifting to suburban communities, and there is a need to ensure residents living further away from the urban center have access to employment and transportation.

The City of Commerce City C3 Vision Comprehensive Plan (2010) details the following economic development goals to meet the workforce and infrastructure needs of the business community:

- Retain and continue to develop a highly educated workforce. Establish partnerships with K-12 and higher education organizations to develop facilities and programs within the city that could provide industry-specific training for students, residents, and existing businesses.
- Encourage improvements to upgrade landscaping, facades, parking areas, undergrounding utilities, and other upgrades for retail centers.

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.

Overall, Commerce City has almost two jobs for every employable resident. The City has been extremely successful in attracting and keeping businesses. There are however other opportunities to help the businesses and employees.

The former Mile High Greyhound Park site is being redeveloped into a mixed-use area and should be completed in 2022. With land devoted to residential, retail/commercial, open space, and educational uses, the property is poised to help revitalize the area and regain its place as an important community hub in the historic part of Commerce City. This is in the heart of the highest concentration of LMI residents (73%). The vision for the

65-acre site was developed after thoughtful consideration of resident feedback throughout the process.

Since 2005, the city has implemented several programs to support redevelopment in Derby to strengthen the business community with new shops, restaurants, and other services while also supporting the growth of existing businesses. A combination of grant funding and private investment has contributed to these efforts. In 2018, the city approved a plan to upgrade both street lighting and signage elements in the Derby Downtown District. Improved lighting will make the district safer and more welcoming; wayfinding signage will help direct visitors to destinations in Derby, and both will contribute to the area's unique identity within Commerce City. The implementation of this plan began in 2019 and should be completed by 2023.

Several factors shape economic development in Commerce City and the region. In particular, the Regional Economic Strategy for the Denver Regional Council of Governments (2014), Metro Vision 2040, and the City of Commerce City C3 Vision Comprehensive Plan (2010) detail goals for investing in workforce development, education, and job creation. Investments in these high-priority areas will support job and business growth opportunities.

Affordable housing and public resources are vitally important in supporting workforce and business attraction and retention. The City of Commerce City C3 Vision Comprehensive Plan (2010) notes several housing goals, including reinvesting in and rehabilitating aging housing stock, increasing housing types to meet current and future needs, and increasing the range of housing prices. Stakeholders interviewed as part of this planning process ranked the need for quality affordable housing second overall. This housing should be close to jobs, resources, and transportation, including a need for a variety of housing types and sizes. This housing is of particular need for seniors, people with disabilities, people transitioning from homelessness, and people living with HIV/AIDS.

To meet this need, the Commerce City Housing Authority, the City, and Delwest Development Corporation completed a 216 affordable housing unit apartment complex called North Range Crossing Apartments in 2020. These 60% AMI apartments are located next to a large new commercial center and on a bus line, the

At the Mile High Greyhound Park redevelopment site, the Commerce City Urban Renewal Authority, the City, and Delwest Development Corporation are building four different housing types to serve a spectrum of housing needs, including single-family homes, townhomes, market-rate apartments, and affordable housing units.

At the North Platte Tower property, the Urban Land Conservancy and the City are working with a developer to construct a 61 affordable housing unit apartment building. This would be next to the C4 campus and within walking distance of the new N train line station.

Finally, there is high demand for rehabilitation of existing housing stock to increase the supply of high-quality owner-occupied affordable housing. During the first two years of the launch of the Home Repair Programs over 70 rehabilitation projects have been completed. There are currently 26 approved HRP projects in progress or on the waiting list for rehabilitation activities and six applications in various stages of approval. To continue assisting economic growth and job opportunities, the City will continue to devote resources to the development of affordable housing with access to jobs, services, and transportation.

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

The City is in short supply of a skilled workforce. During the neighboring 1.6 billion, 17-mile reconstruction project to neighboring I-70 and I-225 corridors a skilled labor force was seriously lacking. The project had to perform an eight-state search to recruit the needed trades. Another large reconstruction project is occurring over the next several years on the I-270 corridor located in the City. Without additional workforce development, City residents may miss out on this and other future employment and business opportunities that will pay lucrative rates. The interviewed stakeholders identified this need as their third-highest priority.

In Commerce City, those with less than a high school degree or equivalent earned \$29,219 annually. With a college degree, they could expect to earn \$52,141 or 75 percent more. With the number of workers with a bachelor's degree growing quickly, those with lower education attainment will continue to face difficulty finding higher-income employment.²⁴

²⁴ City of Commerce City Housing Needs Assessment 2018, Civitas, LLC, pg 39.

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	\$30,731
High school graduate (includes equivalency)	\$36,622
Some college or Associate's degree	\$46,901
Bachelor's degree	\$54,444
Graduate or professional degree	\$64,443

Data Source: 2015-2019 ACS

About 48.0% of the city's population aged 25 and over have a high school education or less, while 22.1% have a bachelor's degree or higher, according to American Community Survey estimates for 2015-2019. Educational attainment in Commerce City is significantly lower than that in the state of Colorado and the Denver-Aurora-Lakewood metropolitan area, where 40.9% and 43.8% of residents have a bachelor's degree or higher, respectively. Further, for many of the most common jobs in the region, a bachelor's degree is required (see Table 46).

Workforce development efforts should continue to focus on training workers in high-demand skills and supporting workers in accessing educational opportunities in high-demand job sectors with positions that pay a living wage.

Table 46. Educational Requirements for Occupations with Highest Employment, Denver-Aurora-Lakewood, MSA, 2020

Occupation	Number of Jobs	Education Required
Project Management Specialists and Business Operations Specialists, All Other	35,390	Bachelor's degree
Retail Salespersons	34,880	No formal educational credential
Fast Food and Counter Workers	34,410	No formal educational credential
Software Developers and Software Quality Assurance Analysts and Testers	31,120	Bachelor's degree
Stockers and Order Fillers	30,920	No formal educational credential
Registered Nurses	29,390	Bachelor's degree
Customer Service Representatives	28,720	High school diploma or equivalent
Accountants and Auditors	24,390	Bachelor's degree
Cashiers	24,210	No formal educational credential
General and Operations Managers	21,020	Bachelor's degree

Data Source: U.S. Bureau of Labor Statistics. May 2020 Metropolitan and Nonmetropolitan Area Occupational Employment and Wage Estimates. Denver-Aurora-Lakewood, CO.; Occupational Outlook Handbook.

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.

The City's Small Business Resource Center (SBRC) provides new training programs focus on basic start-up essentials, finance tools, marketing, licensing and certifications, government contracting, and business planning. The trainings are offered in either Spanish or English by training program partners. The partners include the Colorado Minority Business Office, the North Denver Small Business Resource Center, Adelante Community Development, and the local Chambers of Commerce. SBRC provides online workshops, trainings, and one-on-one counseling to help address some of the most important challenges when starting or growing a business.

Workshop topics include:

- Starting a business
- Operating and/or growing a business
- Marketing
- Business finance

- Workforce hiring and training
- Other general business issues

CDBG funding was used in 2019-2020 to successfully upgrade and staff at the SBRC. During the pandemic, the staff person was essential in delivering the CARES Act funding to our small businesses.

The Adams County Workforce and Business Center provides career development, training, and education, assistance for job seekers, youth programs, and other employment services.

Front Range Community College in Westminster is the closest higher education campus. They are the largest area community college and offer a wide selection of courses. There are also a wide variety of colleges and universities in the Denver metropolitan area that offer academic degrees, certificates, and workforce training opportunities.

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

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

No. Commerce City has not yet participated in the Comprehensive Economic Development Strategy.

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 of more than 30%, (2) more than 1 person per room, (3) lack of complete kitchen facilities, and (4) lack of complete plumbing facilities. A concentration of households with housing needs is defined as a census tract where more than 40% of households have at least one housing need. Using this definition, there are 5 census tracts with a high concentration of housing problems in Commerce City. Census tracts with high percentages of households with housing burdens are concentrated in the southern half of the city, south of E. 88th Avenue.

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

Racial and ethnic minorities are concentrated south of E. 88th Avenue in Commerce City which is referred to as the Core City. A "concentration" is defined as a census tract in

which more than 50% of residents are people of color. Using 2010 census tracts, Tracts 88.01, 87.06, 87.05, 89.01, and 87.09 have a high concentration of Hispanic residents. These tracts range from 64% Hispanic (Tract 87.05) to 70% Hispanic (Tracts 87.06 and 87.09).

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

Tract 87.09 is the only census tract in Commerce City in which more than 40% of all households have a housing problem and more than 50% of the population is comprised of racial and ethnic minorities. 2019 ACS data indicates that Tract 87.09 is comprised largely of renter households (61%). Only 41 units are identified as vacant, indicating a limited share of housing available for rent or purchase.

Looking at structure type, 56% of the residential units in Tract 87.09 are single-family structures, while 23% are multifamily development with 10 units or more. Many of the structures in this census tract are at least 50 years old, with 1,334 housing units (52%) built before 1970. Around one-quarter (25%) of the owner-occupied units in Tract 87.09 are worth \$150,000. However, 24% of owner-occupied units are worth \$200,000-\$299,999 and 30% are worth \$300,000 or more. More than 70% of homeowners with a mortgage spend between \$1,000 and \$1,999 per month on housing costs. Renters, too, spend around \$1,023 per month on gross rent in this census tract.

Are there any community assets in these areas/neighborhoods?

Community assets in Census tract 87.09 include the newly renovated Eagle Pointe Recreation Center containing the Active Adult Center and numerous facilities; Pioneer Park containing a waterpark and baseball fields; Veterans Memorial Park; and Monaco Park. The Sand Creek Regional Greenway runs adjacent to San Creek in the southern portion of the tract. The census tract contains two schools, Rose Hill Elementary and Victory Preparatory Academy, and houses the Suncor Boys and Girls Club. Commercial resources in Tract 87.09 include Commerce City Plaza, King Soopers, Mi Pueblo Market, and Walmart – however, most of these grocery stores are clustered on the western edge of the tract along Vasquez Blvd. In Census tract 89.01, the new N Line commuter train station was opened in 2020. To the east, the Core City borders the 15,000-acre national wildlife refuge that contains more than 330 species of animals including a herd of bison, deer, prairie dogs, bald eagles, and black-footed ferrets. Ten miles of hiking trails, a wildlife drive, a federal visitor center, and catch-and-release fishing. Also on the east side of the Core City is Dick's Sporting Goods Park is the home to the Colorado Rapids professional soccer team. This is a 50,000-guest stadium and a field complex consisting

of 23 full-size, fully lit sports fields that are available to the public. Numerous special including walks & races, competitions, performances, job fairs, music festivals are held at the stadium and surrounding fields and parking lots.

The City's Civic Center and Police Department are located just south of the wildlife refuge and just west of the stadium adjacent to the Core City. The City's eastern side borders the Denver International Airport.

Are there other strategic opportunities in any of these areas?

Census Tract 87.09 has convenient access to I-270 as well as Vasquez Blvd, a major north-south thoroughfare. The tract also has 5 RTD bus stops, including one-stop at 60th Avenue and Dahlia Street which is accessible to several retail stores. All of the mentioned features improve the economic competitiveness and strategic opportunities for economic development within this area.

MA-60 Broadband Needs of Housing Occupied By Low- And Moderate-Income Households - 91.210(A)(4), 91.310(A)(2)

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

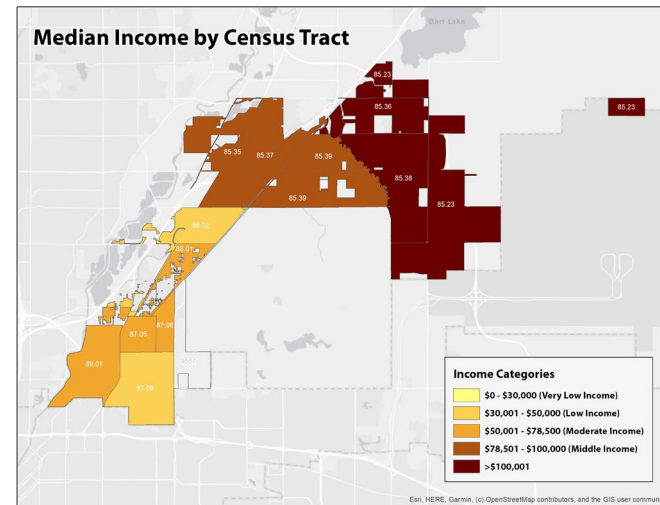
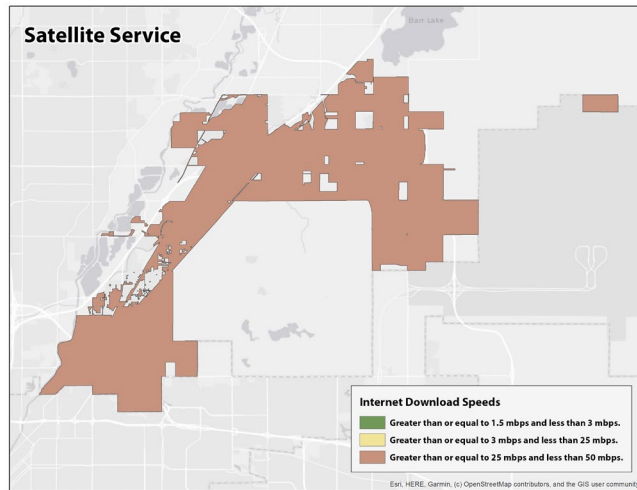
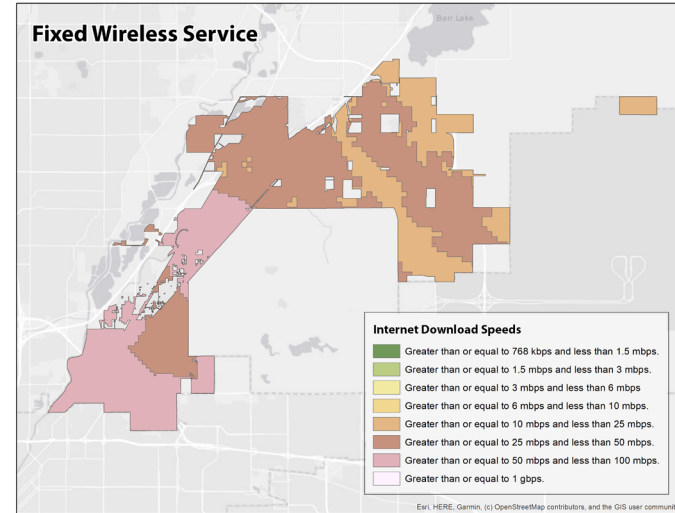
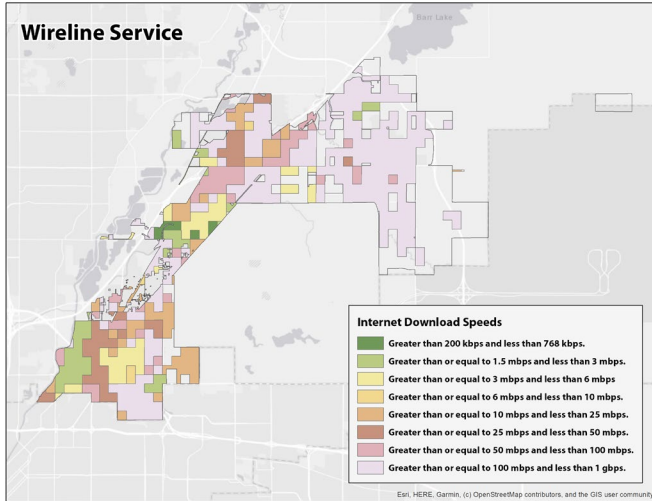
Broadband connectivity is a vital resource that increases residents' equitable access to employment opportunities, education, access to goods, services, and other personal enrichment opportunities. Low- to moderate-income households often have less broadband access than their wealthier counterparts, creating a digital divide that limits their personal and professional opportunities. The ability to access adequate internet services has been crucial during the COVID-19 pandemic when many families are working and learning from home.

In 2015, the FCC defined broadband as internet access with download speeds of 25 Megabits per second (Mbps) and upload speeds of 3 Mbps (otherwise notated as 25/3). With broadband access, internet users can partake in file downloading, video streaming, email, and other activities that are necessary for modern communications. Residents typically have access to several methods of service delivery, including wireline service (provided through ethernet connection), fixed wireless service, and satellite service.

Commerce City's broadband connectivity is captured in the Colorado Broadband Map, recreated below. The Broadband Map, published by the Colorado Broadband Office, uses data provided twice annually by internet service providers through the state's voluntary reporting program. According to the most recent data available, Commerce City residents largely have access to broadband download speeds of 25 Mbps or greater

through either wireline or wireless services. In the lower half of the city (south of E. 96th Avenue) and west of CanAm Highway, several neighborhoods are shown to have wireline download speeds less than 25 Mbps. Industrial areas such as Irondale Industrial, northern Irondale, Fernald, Riverside, and industrial developments in Rose Hill east of Newport Street are shown with wireline connections up to 6 Mbps. Similarly, some residential neighborhoods such as Memory Lane Gardens, Tichy, Kemp, Irondale, and Victory Crossing are not shown to have wireline speeds above 25mbps. Some areas in Dupont, Monaco, Adams City, Adams Heights, and Fairfax Park have unreported internet data.

Conversely, all areas south of E 96th Avenue have access to adequate wireless download speeds (above 25 Mbps). Having wireless service at broadband speeds is critical in these areas where wireline connections may not provide a strong alternative. Due to the nature of their technology, satellite internet services are available widely at adequate speeds but may be suffering from interference by weather conditions, longer ping times, and, occasionally, higher costs. Broadband service is vital in those areas south of E. 96th Avenue, where 2019 ACS data indicate that median incomes tend to fall into the city's low to moderate-income range. Low to moderate-income households in these areas may rely heavily on wireless service for their day-to-day connections, in-lieu of broadband wireline or satellite service. These families may face greater difficulties managing work and school assignments with multiple users and devices utilizing a shared wireless connection.



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

Commerce City has a variety of broadband providers throughout the city, according to both the Colorado Deployment Map and the FCC Broadband Map. Wireline broadband services are offered by Comcast, Unite, and Century Link, although Century Link does not provide internet at broadband speeds throughout the city. Wireless service is offered by several providers in varying locations, including Aerux, DirectLink, Hilltop, JAB Wireless, MHO, and Rise. Satellite services are provided by Hughes Network Systems, Skycasters, and ViaSat. While the FCC and Colorado Broadband Maps identify this wide range of providers, it should also be noted that some sources criticize the FCC's data collection methodology, noting that any census tract with *at least one residential or business broadband consumer* is counted as being "served." On the contrary, the Colorado Broadband Map offers address-based provider information and is a more reliable source for location-specific provider information.

Despite the variety of wireless providers in the city, Comcast remains the most prominent wireline provider. Comcast offers a special program for low-income households called the Internet Essentials program. Subscribers who are eligible for SNAP, Medicaid, or other benefits and who have not had Comcast service for at least 90 days can apply for Internet Essentials. Once in the program, subscribers are eligible for low-cost high-speed internet (\$9.95/month), a low-cost refurbished laptop for \$149.99, free wi-fi and internet training courses. However, stakeholders report that this low-cost alternative does not provide consistent service quality across the city, nor adequate bandwidth to meet the needs of multiple internet users in a household, which has become essential during the pandemic. PCs for People also offers low-cost high-speed internet (beginning at \$15/month), mobile hotspots (\$80 plus \$15 monthly service costs), and refurbished computers for Commerce City residents. Therefore, low-cost high-speed internet alternatives are available for low-to-moderate-income households. Increased awareness of these programs, as well as adequate training on these devices, continue to be a pressing need for low to moderate-income households.

MA-65 Hazard Mitigation - 91.210(A)(5), 91.310(A)(3)**Describe the jurisdiction's increased natural hazard risks associated with climate change.**

The impacts of increasing natural hazard risks driven by climate change on low- and moderate-income households are important considerations for city staff, regional planners, and housing and service providers in Commerce City and the region. The City of Commerce City participates in the updating and implementation of the Adams

County Hazard Mitigation Plan, a multi-jurisdictional plan that includes Adams County, the City of Commerce City, the Town of Bennett, the City of Brighton, and Denver Water (most recently updated in December 2020).

The plan details high-, medium-, and low-risk hazards in Adams County, noting that thunderstorms, tornado/damaging wind, and winter weather are high-risk hazards in the county; flood, dam failure/incident, drought, and hazardous materials incidents are moderate-risk hazards; and cyber incidents, earthquakes, subsidence, terrorism/ active shooters, and wildfire are low-risk hazards. The local planning team also identified hazards specific to Commerce City (see Figure x), noting that risk from hazardous materials is particularly high due to a large number of hazardous materials facilities and transportation routes in the city. Additionally, in 2014 the City was hit by a large hail storm causing severe damage to buildings and landscape. These storms are common in the Denver Metro Area. The geographic significance of lightning/hail should mirror tornado/high wind.

Figure 2. Ranking of Hazard Events in Commerce City from the Adams County Hazard Mitigation Plan

Table C-7 City of Commerce City Hazard Significance

Hazard	Geographic Location	Probability of Future Occurrence	Magnitude/Severity (Extent)	Overall Significance
Hazardous Materials Incident	Significant	Highly Likely	Critical	High
Flood	Significant	Highly Likely	Limited	Medium
Winter Weather	Significant	Highly Likely	Limited	Medium
Thunderstorms	Significant	Highly Likely	Limited	Medium
Tornado/High Wind	Significant	Highly Likely	Limited	Medium
Lightning/Hail	Limited	Highly Likely	Negligible	Medium
Terrorism/Active Shooter	Limited	Likely	Negligible	Medium
Cyber Incident	Limited	Likely	Limited	Medium
Drought	Limited	Occasional	Negligible	Low
Earthquake	Limited	Occasional	Limited	Low
Subsidence	Limited	Likely	Negligible	Low
Wildfire	Limited	Occasional	Negligible	Low
Dam Failure/Incident	Limited	Occasional	Limited	Low
Plane Crash	Limited	Occasional	Catastrophic	Low

The U.S. Environmental Protection Agency has also noted impacts of climate change that are specific to Colorado, including:

- Reduced snowpack, streamflows, and water availability, which would be expected to shift the tree line, reduce the extent of some ecosystems and threatened species, reduce water flow in streams, threaten fish species, and reduce winter tourism and recreation;
- Decreased rainfall during summer and longer periods without rain, leading to more frequent and severe droughts, and related impacts such as increases in pests and disease, trees that are more susceptible to them, increased irrigation demands, and reduced crop yields;
- Increase in the severity, frequency, and extent of wildfires in Colorado, and associated damage to property and livelihoods; and
- Impacts to human health--particularly for vulnerable populations including children, the elderly, sick, and poor populations-- resulting from extreme temperatures, heat events, and increased formation of ground-level ozone.²⁵

The Adams County Hazard Mitigation Plan identifies mitigation actions and projects for the city and region. For Commerce City, the local planning team identified mitigation strategies to protect critical infrastructure from power outages with emergency generators, sustain the City's mobile fleet by providing internal fuel storage dispensing capability, and improve the Fairfax Park drainage system.

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

The vulnerability of low- and moderate-income households to hazards associated with climate change is an important consideration for jurisdictions and regions in preparing environmental resiliency and other plans. The Fourth National Climate Assessment (2018) notes that vulnerable populations, including low-income and marginalized communities, have reduced capacity to prepare for and cope with severe weather and other climate change-related events and are expected to experience greater impacts. For these reasons, jurisdictions must prioritize adaptation actions to support vulnerable populations.²⁶ American Community Survey 5-Year Estimates for 2015-2019 show that:

²⁵ United States Environmental Protection Agency. (2016). What Climate Change Means for Colorado. Retrieved from: <https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/climate-change-co.pdf>

²⁶ U.S. Global Change Research Program. (2018). Fourth National Climate Assessment. Retrieved from: <https://nca2018.globalchange.gov/>

- An estimated 1,862 of the city's 16,332 households (11.4%) have incomes of less than \$25,000 per year, and
- An estimated 6,502 of the city's 56,071 residents (11.6%) were living below the poverty level in the past 12 months.

For these reasons, a large proportion of the city's residents have reduced capacity to prepare for and cope with the impacts of climate change, and the City of Commerce City will need to prioritize actions that support these populations in preparing for and coping with these impacts.

Strategic Plan

SP-05 Overview

Strategic Plan Overview

This Strategic Plan describes the City's priorities for Community Development Block Grant (CDBG), funding amounts, how resources will be allocated by identified need and geography. It also illustrates how the specific projects funded by the City will address these priorities and the outcomes expected as a result. The priorities represent the highest-level needs expected to be addressed over the 2021-2025 Consolidated Plan period using the City's CDBG funds. In summary, the priority needs are:

- Housing and Homelessness
- Public Services
- Economic Development
- Neighborhood Stabilization
- Public Infrastructure
- Emergency Response
- Administration and Planning

The 2021 Action Plan preparation concurs with the development of Commerce City's 2021-2025 Consolidated Plan process. The City awards CDBG funding to non-profits, public agencies, City departments, and other eligible applicants that provide services and infrastructure for low-income and special needs households. Through these partnerships, the City and the CDBG Program can accomplish progress toward its priority needs.

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

Geographic Area

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

Commerce City's industrial economy depends on Commerce City's rich transportation connectivity with: Denver International Airport; federal and state limited access

expressways including I-70, I-76, I-270, E-470, US6, US85, CO2, CO44, CO224, and CO265; plus, three active railroad lines, the new N Line commuter train, a river, and a large creek. As these features cut through and around the city, they create separated pocket neighborhoods. The historic part of the city contains most of these older pocket neighborhoods. This oldest area of the city comprises the highest percentages of LMI individuals, minorities, older homes, and infrastructure in need of rehabilitation.

Table 47. Geographic Priority Areas

Target Area	Percentage of Funds
Citywide	100%

General Allocation Priorities

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

The Historic City lies south of 96th Avenue, East of Hwy 2 and Quebec Street, then south and west to the City boundaries, containing census tracts 87.05, 87.06, 87.09, 88.01, 99.02, and 89.01. This area may alternately be referred to as the Historic City or the Core City.

Based on the income of the residents and the age of the homes most of the CDBG-funded housing rehabilitation work will take place in the Core City. Funded public services will be dispersed as needed throughout the City to benefit LMI and special population residents.

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

Priority Needs

Table 48. Priority Needs Summary

	Priority need	Housing & Homelessness
	Priority level	High
1	Population(s) served	Extremely Low Income Low Income Moderate Income Victims of Domestic Violence Large Families Families with Children Elderly Chronic Homelessness

	<p>Individuals Mentally Ill Chronic Substance Abusers Veterans Persons with HIV/AIDS Unaccompanied Youth People with Disabilities</p>	
Geographic area(s) affected	Citywide	
Associated goal(s)	<ul style="list-style-type: none"> • Provide, Preserve, & Support Affordable Housing • Promote & Provide Homelessness Solutions, Shelters, and Services 	
Description	<p>Assistance to eligible residents and households through programs such as:</p> <ul style="list-style-type: none"> • Homeless Prevention • Homelessness Assistance • Rent & Mortgage Assistance • Home Repairs and Rehabilitation • Home Accessibility Improvements • Home Energy Efficiency Improvements • Transitional and Alternative Housing • Home Purchasing Assistance • Emergency Shelters and Services • Water and Sewer Tap Fees • Promote Fair Housing and Equal Opportunity 	
Basis for priority	<p>In analysis of the public input received across interviews, focus groups, community meetings, online tools, and all other methods, housing and homelessness-related needs were cited more than almost any other type of need. The only area of need mentioned more often was assistance with resource navigation. Based on this information, the City's internal team of CDBG advisors rated housing and homelessness a high priority need.</p>	
2	Priority need	Public Services
	Priority level	High
	Population(s) served	<p>Extremely Low Income Low Income Moderate Income Families with children Elderly People with Disabilities Victims of Domestic Violence Non-Housing Community Development</p>
	Geographic area(s) affected	Citywide
	Associated goal(s)	<ul style="list-style-type: none"> • Provide Services & Resources for LMI City Residents

	<ul style="list-style-type: none"> • Provide for Workforce Development • Transportation Improvements • Support Special Needs Populations • Neighborhood Appearance, Health, & Safety • Promote Fair Housing and Equal Opportunity 												
Description	<p>Assistance to eligible residents and households through programs such as:</p> <ul style="list-style-type: none"> • Resource Navigation • Senior & Youth Programs • Health and Wellness Programs • Job Training • Housing counseling • Bikeshare/Rideshare • Neighborhood Improvements • Transportation Vouchers • Continuing Education, English, and Trade Skill Courses • Childcare • Food and Nutrition 												
Basis for priority	<p>In an analysis of the public input received across interviews, focus groups, community meetings, online tools, and all other methods, 15 of the top 18 needs were related to public services. Additionally, the demand for public services funding among local agencies and organizations so far exceeds the amount of available funding that the City's internal team of CDBG advisors rated public services a high priority need.</p>												
3	<table border="1"> <tr> <td>Priority need</td> <td>Economic Development</td> </tr> <tr> <td>Priority level</td> <td>High</td> </tr> <tr> <td>Population(s) served</td> <td>Extremely Low Income Low Income Moderate Income Non-Housing Community Development</td> </tr> <tr> <td>Geographic area(s) affected</td> <td>Citywide</td> </tr> <tr> <td>Associated goal(s)</td> <td>Provide Financial Support to For-Profit Businesses</td> </tr> <tr> <td>Description</td> <td> <p>Assistance to eligible residents and businesses through programs such as:</p> <ul style="list-style-type: none"> • Micro-Enterprise Development • Child Care Centers • Senior Care Centers • Business Expansion • Business Stabilization • Business Start-ups </td> </tr> </table>	Priority need	Economic Development	Priority level	High	Population(s) served	Extremely Low Income Low Income Moderate Income Non-Housing Community Development	Geographic area(s) affected	Citywide	Associated goal(s)	Provide Financial Support to For-Profit Businesses	Description	<p>Assistance to eligible residents and businesses through programs such as:</p> <ul style="list-style-type: none"> • Micro-Enterprise Development • Child Care Centers • Senior Care Centers • Business Expansion • Business Stabilization • Business Start-ups
Priority need	Economic Development												
Priority level	High												
Population(s) served	Extremely Low Income Low Income Moderate Income Non-Housing Community Development												
Geographic area(s) affected	Citywide												
Associated goal(s)	Provide Financial Support to For-Profit Businesses												
Description	<p>Assistance to eligible residents and businesses through programs such as:</p> <ul style="list-style-type: none"> • Micro-Enterprise Development • Child Care Centers • Senior Care Centers • Business Expansion • Business Stabilization • Business Start-ups 												

	Basis for priority	The City's internal team of CDBG advisors rated economic development a high priority need given the devastating losses many small and local businesses sustained during the Coronavirus Pandemic. In an analysis of the public input received across interviews, focus groups, community meetings, online tools, and all other methods, housing, and economic development-related needs were cited in the top 18 community needs.
4	Priority need	Neighborhood Stabilization
	Priority level	Low
	Population(s) served	Extremely Low Income Low Income Moderate Income Non-Housing Community Development
	Geographic area(s) affected	Citywide
	Associated goal(s)	Improve Infrastructure, Appearance, Health, & Safety
	Description	Community improvements through programs such as: <ul style="list-style-type: none"> • Neighborhood Cleanups • Art Installations • Health and Wellness Infrastructure and Improvements • Accessibility Improvements • Landscaping and Planting • Noise Abatement • Business Façade Improvements
	Basis for priority	Neighborhood-based improvements were important to many project stakeholders who acknowledged particular needs within the Core City, however, given the relative urgency and opportunity for impact in other areas, the City's internal CDBG Team rated neighborhood stabilization a low priority needs.
5	Priority need	Public Infrastructure
	Priority level	Low
	Population(s) served	All
	Geographic area(s) affected	Citywide
	Associated goal(s)	<ul style="list-style-type: none"> • Improve Public Infrastructure • Improve Connectivity & Access
	Description	Community improvements through programs such as: <ul style="list-style-type: none"> • Transportation • Pedestrian Improvements • Public Transportation Improvements • Park Improvements • Broadband Access

		<ul style="list-style-type: none"> Streetscaping
	Basis for priority	Although many involved in the public input process named public infrastructure improvements they would like to see in their communities, the size of the allocation available to Commerce City relative to the cost of large-scale infrastructure projects minimizes the ability for significant CDBG impact in the area of public infrastructure. The City's team of CDBG advisors rated public infrastructure a low priority.
6	Priority need	Emergency Response
	Priority level	Low
	Population(s) served	All
	Geographic area(s) affected	Citywide
	Associated goal(s)	Respond to Community Emergencies
	Description	Community support in the event of an emergency through programs such as: <ul style="list-style-type: none"> COVID-19 Response and Recovery Flood Recovery Storm Recovery Hazardous Materials Release/Spill Response and Clean-up
	Basis for priority	When natural disasters or other community emergencies occur, there are often significant sources of emergency funding and aid available. While CDBG may complement those sources and provide for longer-term, ongoing recovery efforts, the CDBG Team found these to be low priority uses for CDBG funding relative to other available emergency funds and the other proposed activities.
7	Priority need	Administration & Planning
	Priority level	High
	Population(s) served	All
	Geographic area(s) affected	Citywide
	Associated goal(s)	Administration & Planning
	Description	Program administration and planning costs related to the planning and execution of projects and activities assisted with funds provided under the CDBG program.

Basis for priority	Necessary program administration costs associated with the coordination and delivery of services to Commerce City residents.
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SP-30 Influence of Market Conditions – 91.215 (B)

Influence of Market Conditions

Table 49 – 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)	High level of cost burdens among low-income households; waiting lists for assisted housing units, and need for short-term rental assistance for homeless individuals and families transitioning to permanent housing. Currently, TBRA is provided through HUD's Section 8 Housing Choice Voucher program administered through local housing authorities. Maiker Housing Partners administers about 1,519 vouchers in Adams County, and the Commerce City Housing Authority administers about 110 vouchers in the county.
TBRA for Non-Homeless Special Needs	High level of cost burdens among low-income households, including non-homeless special needs populations; waiting lists for assisted housing units for seniors and people with disabilities.
New Unit Production	Age and condition of housing; waiting lists at existing assisted housing developments; high occupancy rates and rental rates; sales prices unaffordable to low/moderate-income households.
Rehabilitation	Age and condition of housing; issues related to substandard housing, especially for low-income renters; the need for home repairs for seniors and other homeowners, including lead-based paint remediation.
Acquisition, including preservation	Subsidized housing developments anticipated to age out of their affordability period; age, condition, and availability of multifamily properties suitable for acquisition/rehabilitation; vacant/hazardous buildings identified through code enforcement.



SP-35 Anticipated Resources - 91.215(A)(4), 91.220(C)(1,2)

Introduction

Commerce City expects to receive an allocation of \$431,414 in entitlement grant resources under the CDBG Program for the 2021 program year. The table below estimates anticipated funding amounts available over the remaining four years of the five-year plan period by multiplying the 2021 allocation amount by four, assuming level funding for the program over that period.

Anticipated Resources

Table 50. Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public – Federal	Admin and planning, Economic development, Housing, Public improvements, Public services	\$431,414	\$0	\$0	\$431,414	\$1,725,656	Anticipated funding will include Entitlement grant funds, program income, and prior-year resources.



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

The CDBG program does not have a matching requirement, however, Commerce City encourages City departments and subrecipients to leverage other resources to further the reach of the CDBG funds and increase the support available to organizations and individuals benefitting from the City's CDBG investments.

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

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

Discussion

During the 2021-2025 Consolidated Plan period, Commerce City expects to access additional resources through two different avenues: the Section 108 Loan Program and the Adams County HOME Consortium. The Section 108 Loan Program allows CDBG grantees to borrow against their future years' CDBG allocations to make a large investment in a CDBG-eligible activity. Generally, borrowing capacity is limited to five times the grantee's annual grant amount (approximately \$2.1 million in Commerce City's case) and is often used to fill a financing gap for larger development projects. As it is part of the CDBG Program, all Section 108-funded projects and activities must meet one of the CDBG Program's national objectives. The consultations and public engagement conducted for this Consolidated Plan included informing participants of the Section 108 opportunity and soliciting their input on potential projects to be funded through the loan.

A second opportunity under consideration by the City is joining the Adams County HOME Consortium, which Commerce City expects to do in its 2022 program year. Participation in the County's HOME Consortium will allow the City to access federal affordable housing funding through HUD's Home Investment Partnerships Act (HOME) Program. The HOME Program targets housing assistance to households with less than 80% of area median income through a variety of potential programs including homeowner rehabilitation, repair, and reconstruction; homebuyer activities such as acquisition, rehabilitation, new construction, and down payment assistance; rental housing acquisition, rehabilitation, and new construction; and tenant-based rental assistance. Specific programming of HOME funds within Commerce City would require the Consortium's approval and would have to be fully described in a future Annual Action Plan before the funds would be available.

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.

Agencies and organizations through which Commerce City will carry out its Consolidated Plan are shown in Table 53. In addition to those listed in the table, the County will rely on a variety of non-profit and private sector housing developers, including Community Housing Development Organizations (CHDOs), Low-Income Housing Tax Credit developers, and others.

To access additional federal resources for affordable housing needs, Commerce City expects to join the Adams County HOME Consortium for a three-year term beginning with the 2022 program year. By participating together in a HOME Consortium, neighboring governments work together to develop collaborative approaches to local and regional housing needs. Joining together improves cooperation between local governments, fosters regional planning, and increases the opportunities for local affordable housing developments.

Table 51. Institutional Delivery Structure

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Commerce City	Government	<ul style="list-style-type: none"> • Community Development • Park, Recreation, and Golf • Planning • Neighborhood Improvements • Economic Development • Public Facilities • Public Services • Fair Housing 	Jurisdiction
Metro Denver Homeless Initiative	Continuum of Care	<ul style="list-style-type: none"> • Homelessness • Public Services 	Region
Adams County	HOME Consortium	<ul style="list-style-type: none"> • Housing 	Adams County
Brothers Redevelopment	Non-profit organization and contractor	<ul style="list-style-type: none"> • Housing 	Jurisdiction

Assess of Strengths and Gaps in the Institutional Delivery System

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

The City of Commerce City supports a variety of programs with goals of increasing housing affordability, providing public services, and improving public facilities and infrastructure. The City has developed strong partnerships with the Metro Denver Homeless Initiative and numerous nonprofit service providers.

In April 2021, the City hired a full-time Homeless Navigator. She will provide outreach, information, basic supplies, and basic on-site services for the homeless and homeless encampment(s) in the City. The 2021 Annual Action Plan awards \$10,000 in CDBG public service funding to purchase some of the supplies and services.

Several other organizations work to address the needs of people experiencing homelessness, including Access Housing, which provides transitional housing and case management; Almost Home, which provides emergency shelter, emergency assistance, motel vouchers during periods of severe weather, case management, and re-housing assistance; and Maiker Housing Partners, which provides housing vouchers, affordable housing, and rent and utility assistance. In 2021 Commerce City executed funding and operational partnerships and agreements with each of these organizations.

Homeless service providers noted that the institutional delivery system in Commerce City lacks support and resources for individuals experiencing homelessness, such as drop-in centers or navigation centers. Available resources such as those provided by Access Housing have tended to be more focused on families rather than individuals. There is also a lack of resources for seniors, who often must go to Denver, Jefferson, or Arapahoe counties to receive services.

Residents and stakeholders who participated in this planning process also noted a need for funding to implement homelessness programs. While a range of housing and service providers exist in the city, there is a need to increase the capacity of these providers to provide beds and services through increased funding.

Additional gaps include:

- The dramatic increase in housing expenses necessitates that minimum wage earners work 2.7 full-time jobs to make ends meet while renting a two-bedroom housing unit.
- Cooperation with mobile home park owners and mobile homeowners.
- Effective and affordable public transportation options, especially for seniors and low-income residents.

Table 52. Homeless Prevention Services Summary

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		
Mortgage Assistance	X	X	
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services	X	X	
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			

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

The Metro Denver Homeless Initiative and a variety of agencies and organizations provide services to people experiencing homelessness in Commerce City:

- Commerce City's Police Department operates a Victim Services Division (VS). The CDBG program supports homelessness prevention through VS's Domestic Violence Victim Services (DVV). For reported domestic violence cases, residents and their families can receive temporary emergency support including hotel stays, moving expenses, rent, mortgage, utility payments, food, pet care, and phones.
- Access Housing provides eight emergency, short-term, 2-bedroom apartments for homeless families. Currently, two of the units are uninhabitable due to plumbing issues. In 2020, Access Housing sold two properties totaling 16 transitional housing units to the private sector.
- Cold Weather Care in nearby Westminster provides emergency shelter, meals, support, and case management to residents experiencing homelessness during the cold months from October to April.
- Almost Home in nearby Brighton provides emergency shelter, emergency assistance, motel vouchers during periods of severe weather, case management, and re-housing assistance.
- Comitis Crisis Center in Aurora provides emergency shelter for adults experiencing homelessness. They have a lottery line and provide meals, clothing, showers, case management, and supportive services. They provide emergency and transitional family and single veteran shelters offering similar services. During cold weather, they operate a Day Resource Center.
- Growing Home in nearby Westminster operates 18 affordable housing units as well as two transformational units in which participants receive reduced rent and monthly case management support while attending school.
- Maiker Housing Partners provides housing vouchers, affordable housing, and rent and utility assistance in Adams County.

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

The City of Commerce City works with community partners to support projects that provide housing and supportive services to people experiencing homelessness. The City's new full-time Homeless Navigator will provide outreach, information, basic supplies, and basic on-site services for the homeless and homeless encampment(s) in the City.

Other collaborating organizations and agencies will coordinate funding and resources to make additional beds and services available to people experiencing homelessness. Efforts include increasing emergency shelter, transitional housing, and permanent supportive housing and streamlining the assessment and referral process.

The primary gap in the service delivery system for special needs populations is the lack of funding needed to create additional beds and services. There is also a gap in services delivery for difficult-to-place special needs clients. The lack of supply of affordable rental and for-sale housing in the city presents another gap in the service delivery system.

Residents and stakeholders who participated in this planning process also noted a need for:

- Access to homeless shelters
- Housing with on-site services and case management
- Day centers where people can address personal needs
- Homelessness prevention programs
- Affordable housing options
- Mobile outreach
- Hotel vouchers
- Clothing
- Rapid Re-housing
- A homeless shelter
- Safe places for people to camp and park with access to transportation
- Vouchers for youth transitioning out of foster care
- Funding for the first month's rent and moving costs
- Homelessness prevention for unreported domestic violence victims
- Mental health and drug rehabilitation services
- Workforce development 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

Over the next five years, the City of Commerce City will work with City departments and local partners, such as Maiker Housing Partners, Access Housing, Almost Home, other homeless housing and service providers, nonprofit agencies, and other local and regional partners to leverage CDBG funding to address the identified gaps in institutional structure and service delivery. Each year, the City will consider projects that strengthen opportunities for collaboration among the City and its partners.



SP-45 Goals Summary – 91.215(A)(4)

Goals Summary Information

Table 53. Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide, Preserve, and Support Affordable Housing	2021	2025	Affordable Housing	Citywide	Housing and Homelessness	\$750,000	Homeowner Housing Rehabilitated: 75 Housing units
2	Promote and Provide Homelessness Solutions, Shelters, and Services	2021	2025	Homeless	Citywide	Housing and Homelessness	\$75,681	Public service activities other than Low/Moderate Income Housing Benefit: 40 Persons assisted
3	Provide Services & Resources for LMI City Residents	2021	2025	Non-Homeless Special Needs	Citywide	Public Services	\$103,560	Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons assisted
4	Provide for Workforce Development	2021	2025	Non-Housing Community Development	Citywide	Public Services	\$75,000	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons assisted
5	Support Special Needs Populations	2021	2025	Non-Homeless Special Needs	Citywide	Public Services	\$100,000	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons assisted



6	Neighborhood Appearance, Health, & Safety	2021	2025	Non-Housing Community Development	Citywide	Public Services	\$25,000	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons assisted
7	Promote Fair Housing and Equal Opportunity	2021	2025	Non-Housing Community Development	Citywide	Public Services	\$20,000	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons assisted
8	Provide Financial Support to For-Profit Businesses	2021	2025	Non-Housing Community Development	Citywide	Economic Development	\$35,000	Jobs created/ retained: 3.5 Jobs 10 Businesses assisted
9	Improve Infrastructure, Appearance, Health, & Safety	2021	2025	Non-Housing Community Development	Citywide	Neighborhood Stabilization	\$30,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 300 Persons assisted
10	Improve Public Infrastructure	2021	2025	Non-Housing Community Development	Citywide	Public Infrastructure	\$25,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 75 Persons assisted
11	Improve Connectivity & Access	2021	2025	Non-Housing Community Development	Citywide	Public Infrastructure	\$45,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 100 Persons assisted



12	Response and Recovery to Community Emergencies	2021	2025	Other: Emergency Response	Citywide	Emergency Response	\$10,000	Public service activities other than Low/Moderate Income Housing Benefit: ?? Persons assisted
13	Planning and Administration	2021	2025	Other: Administration and Planning	Citywide	Planning and Administration	\$431,414	N/A

Goal Descriptions

Sort Order	Goal Name	Description
1	Provide, Preserve, and Support Affordable Housing	Provide for the preservation and repair of existing affordable housing, support for low- and moderate-income residents facing unaffordable rent and mortgage costs, and development of diverse affordable housing types.
2	Promote and Provide Homelessness Solutions, Shelters, and Services	Provide services and housing options to individuals and families who are experiencing homelessness.
3	Provide Services & Resources for LMI City Residents	Provide public services to stabilize low- and moderate-income individuals and households and/or those with non-homeless special needs and increase their access to opportunity.
4	Provide for Workforce Development	Provide job training, technology training, and student support opportunities to increase workforce readiness.
5	Support Special Needs Populations	Support the needs of residents with non-homeless special needs through crime prevention and victim support programs.
6	Neighborhood Appearance, Health, & Safety	Provide public services such as food and nutrition programs and mental health services that enhance health and safety.
7	Promote Fair Housing and Equal Opportunity	Provide education and resources to residents and housing-related professionals regarding fair housing.
8	Provide Financial Support to For-Profit Businesses	Provide support for economic development initiatives such as business incubators, grants, and technical assistance to entrepreneurs and small businesses.
9	Improve Infrastructure, Appearance, Health, & Safety	Activities to improve parks, walkability, health and safety, facility accessibility, and business façades to stabilize and improve neighborhoods and areas.
10	Improve Public Infrastructure	Improve public facilities and infrastructure to benefit low- and moderate-income households and communities.

11	Improve Connectivity & Access	Provide for public transportation, alternative transportation, pedestrians, and broadband infrastructure to enhances connectivity, accessibility productivity, and safety between residents, places, and services.
12	Respond to Community Emergencies	Direct funding to recovery from community emergencies and/or natural disasters.
13	Planning and Administration	Administration and planning activities for the City's CDBG Program.

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)

Over this five-year Consolidated Plan cycle, the City expects to assist 75 low- and moderate-income households through minor home repair and Paint-a-Thon projects.

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)

For affordable housing developments, the requirement is that 5% of the total development units are to be accessible units.

Activities to Increase Resident Involvements

Maiker Housing Partners plans to continue increasing resident involvement through its revamped Family and Community Vitality program. The program engages residents in community organizing events, such as community gardens, art installations, and resident advocacy at the state and local levels. MHP also plans to broaden its resource navigation program to help residents find health, education, and other social service resources throughout the county. MHP also works in partnership with HIPPY (Home Instruction for Parents of Preschool Youngsters) to provide preschool education for residents.

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

No. Maiker Housing Partners received a score of 99 on a 100-point scale during its 2012 PHAS assessment.

Plan to remove the 'troubled' designation

Not applicable.

SP-55 Barriers to Affordable Housing – 91.215(H)**Barriers to Affordable Housing**

The Consolidated Plan public engagement process identified several barriers to affordable housing, including increasing water and wastewater connection fees, lengthy development review processes, and pushback against affordable multi-family housing from members of the community.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Commerce City has limited control over increases to water and wastewater connection fees since these fees are set by the South Adams County Water and Sanitation District.

The city's 2010 Comprehensive Plan calls for increased housing diversity and a city housing mix that includes 25% multifamily residential units. The comprehensive plan also offers best practices that include mixing single-family and multi-family units in the same neighborhood. According to the city's zoning map, there are currently a limited number of parcels zoned R-3 Multi-family Residential. These parcels are located primarily south of E. 88th Avenue. Multifamily uses are also allowed in the city's Mixed-Use district; however, this district type is rarely used as well. Large areas in the city's northern half are zoned for Planned Unit Development (PUD) which allows for a housing mix, but also requires council approval for development plans.

SP-60 Homelessness Strategy – 91.215(D)**Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

Commerce City is a member of the Metro Denver Homeless Initiative, a multi-agency collaboration focused on ending homelessness in the seven-county Denver metropolitan area. The initiative, which serves as the Continuum of Care for the Denver metropolitan area, brings together public and private organizations to provide homelessness prevention services, housing placement assistance, transitional housing, and permanent supportive housing for persons who are experiencing or at risk of homelessness. Individuals and families may access their services throughout Adams County at a variety of agencies and facilities that coordinate with the larger Continuum of Care.

Expanding the availability of homeless services and housing is one of the City's priorities for the 2021-2025 Consolidated Plan. Activities funded under this priority may include

outreach to unsheltered homeless persons, including the funding of a homelessness resource navigator. Commerce City also participates in the Metro Denver Continuum of Care's Point-in-Time count, which includes outreach to people experiencing homelessness and evaluation of needs. Current homeless outreach services in Commerce City include:

- A Precious Child provides wrap-around service navigation for residents and the homeless in need. Soon they will open a free store at the C4 medical campus that opens in 2021. APC coordinates with the local school districts' homeless liaisons to provide services and supplies to homeless families.
- Anythink Library in Commerce City provides bi-lingual job search and application assistance, a computer lab with ADA-accessible workstations, a free lunch program, and children and teen areas.

Addressing the emergency and transitional housing needs of homeless persons

Commerce City may fund facility improvements or services provided by emergency or transitional housing providers over the next five years under the priority of expanding the availability of homeless services and housing. Area organizations such as Access Housing, Cold Weather Care, Almost Home, Growing Home, and other providers will continue to provide emergency and transitional for people experiencing homelessness. Additional emergency and transitional housing services include:

- A new chapter of Saint Vincent de Paul opened in Commerce City in early 2020. They offer service navigation, short-term emergency housing funds, food, clothing, and general counseling.
- Almost Home provides a small homeless shelter, emergency hotel vouchers, and supporting service coordination in the neighboring City of Brighton.
- Star Girlz Empowerment in the nearby City of Aurora provides mentoring, transitional housing, career exploration, personal development, mental health services, and other opportunities for girls and women aged 10 to 25. They also support girls and young women transition out of human trafficking.
- The Commerce City Police Department Victim Services Unit provides victim advocates, resources, information, and referrals.

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

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

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

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

- Growing Home in nearby Westminster offers homelessness prevention, a home-visitation program for children prenatal through age 5, and a 10-week class for new and expecting parents focused on healthy child development.
- Catholic Charities of Denver offers emergency assistance, early childhood education programs, counseling, women's health services, senior services, and immigration services, among other programs.

SP-65 Lead-Based Paint Hazards – 91.215(I)

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

The City of Commerce City will follow HUD's Lead Safe Housing Rule (24 CFR Part 35) and EPA's Lead Renovation, Repair, and Painting Program Rule (40 CFR Part 745), lead-safe practices are administered for any eligible home constructed before 1978. These requirements will be followed should it undertake any federally funded affordable housing development activities, including new construction. The rule includes requirements for disclosure of lead-based paint hazards, risk assessment, evaluation, hazard reduction, interim controls, maintenance, and rehabilitation of properties. A lead hazard screen and/or full risk assessment will also be performed for housing projects receiving rehabilitation assistance.

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

Following the Lead Safe Housing Rule requirements in federally funded housing activities reduces the risk of lead poisoning and hazards. The Lead Safe Housing Rule is designed to reduce hazards relating to lead-based paint in housing, which include irreversible health effects, brain, and nervous system damage, reduced intelligence, and learning disabilities. Children, pregnant women, and workers are most at risk of experiencing negative health effects resulting from exposure to lead-based paint hazards. More than 20 million homes in the United States built before 1978 contain lead-based paint hazards. For these reasons, it is vital that the City of Commerce City test for and reduce lead-based paint hazards, as required, in all federally funded housing activities.

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

The City of Commerce City integrated Lead Safe Housing Rule requirements into the Home Repair Program's program guide and follows HUD's Lead Safe Housing Rule requirements in all of the City's federally funded affordable housing development activities.

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

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

An estimated 11.6% of Commerce City residents were living below the poverty level in the past 12 months, above the statewide poverty rate of 10.3%, according to American Community Survey 5-Year Estimates for 2015-2019. The city's poverty rate has decreased since the 2008-2012 ACS estimates when it was estimated at 17.7%.²⁷ The City of

²⁷ American Community Survey 5-Year Estimates. (2014-2018 and 2008-2012). Poverty Status in the Past 12 Months. Table S1701. Retrieved from: data.census.gov

Commerce City C3 Vision Comprehensive Plan (2010), the Economic Development Strategic Plan (2010), and this Consolidated Plan detail goals related to reducing poverty, including:

Economic and Workforce Development

- Conduct in-depth research to determine occupations and skill sets most in demand by the targeted industries.
- Ensure that employer feedback about workforce strengths and weaknesses is periodically gathered through City-employer programs and communicated to area workforce development providers.
- Elevate high school graduation rates, higher education, and job training among area residents.
- Increase local employer understanding and utilization of workforce development programs.
- Neighborhood improvements through business and commercial area façade improvements.
- Continue to expand the SBRC's utilization.

Housing

- Reinvest in and rehabilitate aging housing stock
- Increase affordable housing options
- Increase housing types to meet current and future needs
- Increase the range of housing prices
- Increase home-buying opportunities
- Assist with rent, mortgage, and utility assistance to avoid evictions and foreclosures
- Increase senior and ADA compliant housing

Other

- Provide community resource navigation and accessible resource directories.
- Ensure neighborhood accessibility to all modes of travel.
- Strengthen existing neighborhoods through reinvestment and assistance with renewal efforts
- Promote regular physical activity by providing safe, convenient opportunities for recreation and human-powered travel
- Improve access to health care facilities, programs, and human services

- Encourage increased access to healthy foods for all residents
- Build and maintain parks to enhance neighborhoods and meet current and future generation needs
- Increase year-round active recreation opportunities
- Increase educational options for life-long learning

Programs for reducing poverty and supporting economic and workforce development in the city of Commerce City include:

- The Adams County Workforce and Business Center provides resources for job seekers, youth, and businesses in Adams County;
- The Commerce City Small Business Resource Center provides workshops, trainings, and one-on-one counseling to support residents in starting or growing a business;
- The nonprofit organization Adelante Community Development provides resources and events for Latino businesses in Commerce City; and
- The Commerce City Community Campus (C4) provides a centralized location for health and social services in Commerce City.

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

The housing affordability, workforce development, and homelessness programs detailed in this plan aim to support the achievement of the housing and economic development goals for the city and region. The goal of expanding housing choice and affordability is central to goals detailed in both the City's Comprehensive Plan and this Consolidated Plan. The City will continue to fund services to assist individuals in obtaining housing and employment and in meeting other needs.

In addition to resources available through economic development programs and general public services, assistance focused on reducing poverty is offered through homelessness service providers in the city of Commerce City. For example, Almost Home offers rental, mortgage, utility, and water assistance for households that are at risk of eviction or foreclosure due to loss of income or an increase in expenses.

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 assesses the quality of Commerce City's CDBG program operations and performance over time to help prevent instances of fraud, waste, and abuse. Implementation of the City's monitoring process not only ensures effective and efficient operations but compliance with federal program standards and regulations. The City relies 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 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 review the proposed projects for CDBG eligibility and ensure they each meet a National Objective. In documenting determinations of eligibility, staff use the applicable review checklists found in Chapter 3 of the CPD Monitoring Handbook (Exhibits 3-1 through 3-9).
2. Individual Monitoring – Includes ongoing contact with the Subrecipients/Contractors to provide guidance to prevent potential issues and ensure compliance with Federal regulations.
3. Desktop Monitoring – Completed on an ongoing basis while the project is still open and completed annually after closeout. This includes a review of Subrecipients'/Contractors' quarterly or annual reports, financial audits, and compliance with CDBG, and crosscutting Federal regulations. This type of monitoring enables the city to analyze information such as accomplishments and expenditures and compliance with Federal regulations, which, in turn, helps determine the need for additional technical assistance or future on-site visits. This monitoring also ensures that completed activities continue to be used for the same purpose and continue to benefit-eligible populations. The review of reports is completed quarterly for current projects, and annually for previously funded projects that are required to continue to benefit low- and moderate-income populations. If Davis-Bacon applies to the project, the payrolls are reviewed on an ongoing basis until the project is fully completed.

4. On-site Monitoring – All activities are monitored on-site upon final payment. As a standard, Commerce City will conduct subsequent on-site monitoring every three years until the compliance or affordability period is met. However, depending on the results of the desktop and/or on-site monitoring, the city may monitor more frequently if there is an indication of instability in the Subrecipient/Contractor. The monitoring consists of interviews with key staff and a review of pertinent records. The city also conducted on-site Davis-Bacon interviews for any construction project that took place during Program Year 2018-19.
5. Drawdown Requests – City staff reviewed drawdown requests and supporting documents for compliance with all reporting requirements and to verify the Subrecipient/Contractor is requesting reimbursement for approved purchases as outlined in the contract.
6. If an activity is subject to Section 3 of the Housing and Urban Development Act or required to report on Minority or Women-Owned Businesses (MBE/WBE) utilized, the city provides additional information, technical assistance, and forms. City staff discusses the requirements applicable to the regulations with both the Subrecipient/Contractor the RFP process, any pre-construction meetings, Davis-Bacon interviews, and post-completion technical assistance.



**City of Commerce City
2021 Year One Action Plan**

July 2021



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Expected Resources

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

Introduction

Commerce City expects to receive an allocation of \$431,414 in entitlement grant resources under the CDBG Program for the 2021 program year. The table below estimates anticipated funding amounts available over the remaining four years of the five-year plan period by multiplying the 2021 allocation amount by four, assuming level funding for the program over that period.

Anticipated Resources

Table 54. Expected Resources – Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public – Federal	Admin and planning, Economic development, Housing, Public improvements, Public services	\$431,414	\$0	\$0	\$431,414	\$1,725,656	Anticipated funding will include Entitlement grant funds, program income, and prior year resources.

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

The CDBG program does not have a matching requirement, however, Commerce City encourages City departments and subrecipients to leverage other resources to further the reach of the CDBG funds and increase the support available to organizations and individuals benefitting from the City's CDBG investments.

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

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

Discussion

During the 2021-2025 Consolidated Plan period, Commerce City expects to access additional resources through two different avenues: the Section 108 Loan Program and the Adams County HOME Consortium. The Section 108 Loan Program allows CDBG grantees to borrow against their future years' CDBG allocations to make a large investment in a CDBG-eligible activity. Generally, borrowing capacity is limited to five times the grantee's annual grant amount (approximately \$2.1 million in Commerce City's case) and is often used to fill a financing gap for larger development projects. As it is part of the CDBG Program, all Section 108-funded projects and activities must meet one of the CDBG Program's national objectives. The consultations and public engagement conducted for this Consolidated Plan included informing participants of the Section 108 opportunity and soliciting their input on potential projects to be funded through the loan.

A second opportunity under consideration by the City is joining the Adams County HOME Consortium, which Commerce City expects to do in its 2022 program year. Participation in the County's HOME Consortium will allow the City to access federal affordable housing funding through HUD's Home Investment Partnerships Act (HOME) Program. The HOME Program targets housing assistance to households with less than 80% of area median income through a variety of potential programs including homeowner rehabilitation, repair, and reconstruction; homebuyer activities such as acquisition, rehabilitation, new construction, and down payment assistance; rental housing acquisition, rehabilitation, and new construction; and tenant-based rental assistance. Specific programming of HOME funds within Commerce City would require the Consortium's approval and would have to be fully described in a future Annual Action Plan before the funds would be available.

Annual Goals and Objectives

AP-20 ANNUAL GOALS AND OBJECTIVES

Goals Summary Information

Table 55. Goals Summary

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide, Preserve, and Support Affordable Housing	2021	2025	Affordable Housing	Citywide	Housing and Homelessness	\$210,421	Homeowner Housing Rehabilitated: 18 Housing units
2	Promote and Provide Homelessness Solutions, Shelters, and Services	2021	2025	Homeless	Citywide	Housing and Homelessness	\$10,000	Public service activities other than Low/Moderate Income Housing Benefit: 80 Persons assisted
3	Provide Services & Resources for LMI City Residents	2021	2025	Non-Homeless Special Needs	Citywide	Public Services	\$30,711	Public service activities other than Low/Moderate Income Housing Benefit: 390 Persons assisted
4	Provide for Workforce Development	2021	2025	Non-Housing Community Development	Citywide	Public Services	\$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons assisted
5	Support Special Needs Populations	2021	2025	Non-Homeless Special Needs	Citywide	Public Services	\$24,000	Public service activities other than Low/Moderate Income Housing Benefit: 12 hhlds, 30 persons assisted

6	Neighborhood Appearance, Health, & Safety	2021	2025	Non-Housing Community Development	Citywide	Public Services	\$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons assisted
7	Promote Fair Housing and Equal Opportunity	2021	2025	Non-Housing Community Development	Citywide	Public Services	\$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons assisted
8	Provide Financial Support to For-Profit Businesses	2021	2025	Non-Housing Community Development	Citywide	Economic Development	\$0	Jobs created/retained: 0 Jobs 0 Businesses assisted
9	Improve Infrastructure, Appearance, Health, & Safety	2021	2025	Non-Housing Community Development	Citywide	Neighborhood Stabilization	\$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons assisted
10	Improve Public Infrastructure	2021	2025	Non-Housing Community Development	Citywide	Public Infrastructure	\$70,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200 Persons assisted
11	Improve Connectivity & Access	2021	2025	Non-Housing Community Development	Citywide	Public Infrastructure	\$0	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 0 Persons assisted



12	Response and Recovery to Community Emergencies	2021	2025	Other: Emergency Response	Citywide	Emergency Response	\$0	Public service activities other than Low/Moderate Income Housing Benefit: 0 Persons assisted
13	Administration and Planning	2021	2025	Other: Administration and Planning	Citywide	Administration and Planning	\$86,282	N/A

Goal Descriptions

Sort Order	Goal Name	Description
1	Provide, Preserve, and Support Affordable Housing	Provide for the preservation and repair of existing affordable housing, support for low- and moderate-income residents facing unaffordable rent and mortgage costs, and development of diverse affordable housing types.
2	Promote and Provide Homelessness Solutions, Shelters, and Services	Provide services and housing options to individuals and families who are experiencing homelessness.
3	Provide Services & Resources for LMI City Residents	Provide public services to stabilize low- and moderate-income individuals and households and/or those with non-homeless special needs and increase their access to opportunity.
4	Provide for Workforce Development	Provide job training, technology training, and student support opportunities to increase workforce readiness.
5	Support Special Needs Populations	Support the needs of residents with non-homeless special needs through crime prevention and victim support programs.
6	Neighborhood Appearance, Health, & Safety	Provide public services such as food and nutrition programs and mental health services that enhance health and safety.
7	Promote Fair Housing and Equal Opportunity	Provide education and resources to residents and housing professionals regarding fair housing.
8	Provide Financial Support to For-Profit Businesses	Provide support for economic development initiatives such as business incubators and assistance to entrepreneurs and small businesses.
9	Improve Infrastructure, Appearance, Health, & Safety	Activities such as park improvements, neighborhood cleanups, accessibility improvements, and business façade improvements to stabilize and improve neighborhood appearance.

10	Improve Public Infrastructure	Improve public facilities and infrastructure to benefit low- and moderate-income households and communities.
11	Improve Connectivity & Access	Provide for public transportation, pedestrian, and broadband infrastructure that enhances connectivity between people and places in Commerce City.
12	Respond to Community Emergencies	Direct funding to recovery from community emergencies and/or natural disasters.
13	Planning and Administration	Administration and planning activities for the City's CDBG Program.

Projects

AP-35 Projects – 91.220(D)

Introduction

The projects listed below represent the activities Commerce City plans to undertake during the 2021 program year.

Projects

Table 56. Project Information

#	Project Name
1	Domestic Violence Victim Support
2	A Precious Child
3	Kids in Need of Dentistry
4	Homeless Outreach Supplies
5	Minor Home Repair Program
6	Paint-a-thon Program
7	ADA Fitness Court Installation
8	Administration and Planning

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

The City's allocation priorities reflect its focus on highest-priority needs. Priority needs were identified through data analysis, extensive community engagement, and consultation with stakeholders. The key strategic priorities that emerged from the Consolidated Plan process and that these projects are designed to address are listed below:

AP-38 Project Summary

Project Summary Information

1	Project Name	Domestic Violence Victim Support
	Target Area	Citywide
	Goals Supported	Support Special Needs Populations
	Needs Addressed	Public Services
	Funding	CDBG: \$24,000
	Description	Housing, safety, relocation, and basic need assistance for domestic victims and their children/dependents to avoid homelessness and stay safe.

	Target Date	9/30/2022
	Estimate the number and type of persons that will benefit from the proposed activity	Public service activity other than low/moderate-income housing benefit: 30 persons assisted
	Location Description	7887 E. 60 th Avenue, Commerce City, CO 80022
	Planned Activities	Housing, safety, relocation, and basic need assistance for domestic victims and their children/dependents

2	Project Name	A Precious Child
	Target Area	Citywide
	Goals Supported	Provide Services & Resources for LMI City Residents
	Needs Addressed	Public Services
	Funding	CDBG: \$15,000
	Description	The program will provide family case management services for housing, shelters, homelessness prevention, clothing, food, baby items, school supplies, employment help, counseling, and education.
	Target Date	9/30/2022
	Estimate the number and type of persons that will benefit from the proposed activity	Public service activity other than low/moderate-income housing benefit: 300 persons assisted
	Location Description	7051 W. 118 th Ave, Broomfield, CO 80020
Planned Activities	Case management services to help with crisis housing, transitional housing, utility assistance, domestic violence shelters, homelessness prevention, hotel vouchers, and rent and mortgage assistance.	

3	Project Name	Kids in Need of Dentistry
	Target Area	Citywide
	Goals Supported	Provide Services & Resources for LMI City Residents
	Needs Addressed	Public Services
	Funding	CDBG: \$15,711

	Description	KIND will provide on-site service resource navigation for pediatric health services. Services will be located the Commerce City Community Campus (Adams Tower)
	Target Date	9/30/2022
	Estimate the number and type of persons that will benefit from the proposed activity	Public service activity other than low/moderate-income housing benefit: 90 persons assisted
	Location Description	4201 E. 72nd Avenue, Commerce City, CO 80022
	Planned Activities	Partially fund staff members for LMI pediatric dental health services

4	Project Name	Homeless Outreach Supplies
	Target Area	Citywide
	Goals Supported	Promote and Provide Homelessness Solutions, Shelters, and Services
	Needs Addressed	Housing and Homelessness
	Funding	CDBG: \$10,000
	Description	Funds will provide basic supplies and services to the homeless navigator to meet and assist homeless individuals.
	Target Date	9/30/2022
	Estimate the number and type of persons that will benefit from the proposed activity	Public service activity other than low/moderate-income housing benefit: 80 persons assisted
	Location Description	13905 E. 112th Avenue, Commerce City, CO 80022
	Planned Activities	Support for homeless resource navigation

5	Project Name	Minor Home Repair Program
	Target Area	Citywide
	Goals Supported	Provide, Preserve, and Support Affordable Housing
	Needs Addressed	Housing and Homelessness
	Funding	CDBG: \$170,421
	Description	Funds will be used to rehabilitate homes for health, safety, accessibility, and energy efficiency.

	Target Date	9/30/2022
	Estimate the number and type of persons that will benefit from the proposed activity	Homeowner Housing Rehabilitated: 14 Housing units
	Location Description	7887 E. 60 th Avenue, Commerce City, CO 80022
	Planned Activities	Home rehabilitation program

6	Project Name	Paint-a-thon
	Target Area	Citywide
	Goals Supported	Provide, Preserve, and Support Affordable Housing
	Needs Addressed	Housing and Homelessness
	Funding	CDBG: \$40,000
	Description	Funds will provide exterior residential painting and accessibility improvements for seniors and disabled residents.
	Target Date	9/30/2022
	Estimate the number and type of persons that will benefit from the proposed activity	Homeowner Housing Rehabilitated: 12 Housing units
	Location Description	2250 Eaton St, Suite B, Edgewater, CO 80214
	Planned Activities	Exterior residential improvements for seniors and disabled residents

7	Project Name	ADA Fitness Court Installation
	Target Area	Citywide
	Goals Supported	Improve Public Infrastructure
	Needs Addressed	Public Infrastructure
	Funding	CDBG: \$70,000
	Description	Funds will be used to purchase and install a 38' x 38' recreational fitness court within a park in the Core Area.
	Target Date	9/30/2022

	Estimate the number and type of persons that will benefit from the proposed activity	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200 Persons assisted
	Location Description	13905 E. 112th Avenue, Commerce City, CO 80022
	Planned Activities	Improve recreation facilities in the Core City

8	Project Name	Administration and Planning
	Target Area	Citywide
	Goals Supported	Administration and Planning
	Needs Addressed	Administration and Planning
	Funding	CDBG: \$86,282
	Description	Administration and Planning of CDBG funds
	Target Date	9/30/2022
	Estimate the number and type of persons that will benefit from the proposed activity	N/A
	Location Description	7887 E. 60th Ave, Commerce City, CO 80022
	Planned Activities	Administration and Planning

AP-50 Geographic Distribution – 91.220(F)

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

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

Commerce City's industrial economy depends on Commerce City's rich transportation connectivity with: Denver International Airport; federal and state limited access expressways including I-70, I-76, I-270, E-470, US6, US85, CO2, CO44, CO224, and CO265;

plus, three active railroad lines, the new N Line commuter train, a river, and a large creek. As these features cut through and around the city they create separated pocket neighborhoods. The historic part of the City contains most of these older pocket neighborhoods. This oldest area of the city comprises the highest percentages of LMI individuals, minorities, older homes, and infrastructure in need of rehabilitation.

Geographic Distribution

Table 57. Geographic Distribution

Target Area	Percentage of Funds
Citywide	100%

Rationale for the priorities for allocating investments geographically

The Core City lies south of 96th Avenue, East of Hwy 2 and Quebec Street, then south and west to the City boundaries, containing census tracts 87.05, 87.06, 87.09, 88.01, 99.02, and 89.01. This Core City may alternately be referred to as the Historic City.

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

Affordable Housing

AP-55 AFFORDABLE HOUSING – 91.220(G)

Introduction

Table 58. One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	26
Special-Needs	0
Total	26

Table 59. One Year Goals for Affordable Housing by Support Type

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	26
Acquisition of Existing Units	0
Total	26

AP-60 Public Housing – 91.220(H)

Introduction

Publicly supported housing is provided by two agencies in Commerce City: The Adams County Housing Authority (doing business as Maiker Housing Partners) and the Commerce City Housing Authority. According to its 2020-2025 5-Year PHA Plan, Maiker Housing Partners offers 42 public housing units and 1,519 housing choice vouchers across Adams County.

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

Over the next year, Maiker Housing Partners plans to dispose of its remaining public housing community, Casa Redonda, and continue its creation of additional project-based and tenant-based housing vouchers. Additions of publicly supported housing projects will likely include LIHTC projects, such as Maiker's 9% credit LIHTC project at 7401 Broadway Boulevard.

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

Maiker Housing Partners plans to broaden its Family and Community Vitality Program by continuing to add resource navigators to its staff. Resource navigation is designed to help residents find health, education, and other social service resources throughout the county that will support self-sufficiency and overall wellbeing. MHP will also continue to expand its Family Self-Sufficiency program for more HCV members.

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

Not applicable.

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

Introduction

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

Introduction

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

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

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

Expanding the availability of homeless services and housing is one of the City's priorities for the 2021-2025 Consolidated Plan. Activities funded under this priority may include outreach to unsheltered homeless persons. Commerce City also participates in the Metro Denver Continuum of Care's Point-in-Time count, which includes outreach to people experiencing homelessness and evaluation of needs.

Projects to support homeless outreach in the 2021 program year include:

- Establishing community resource navigation and/or a reproducible resource guide; and
- Providing homeless outreach supplies, including basic supplies and services for the City's homeless navigator to meet and assist people experiencing homelessness.

Addressing the emergency shelter and transitional housing needs of homeless persons

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

Projects to address emergency shelter and transitional housing needs in the 2021 program year include:

- Providing wrap-around family support services through a partnership with A Precious Child, and
- Partnering with Kids in Need of Dental to fund staff and services for LMI families to access pediatric dental services.

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

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

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

To assist individuals and families in making the transition to permanent housing, the City expects to enter the Adams County HOME Consortium, to provide additional affordable housing.

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

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

During the 2021 program year, the City will fund the Domestic Violence Victim Program to prevent homelessness.

AP-75 Barriers to Affordable Housing – 91.220(J)

Introduction:

The Consolidated Plan public engagement process identified several barriers to affordable housing, including increasing water and wastewater connection fees, lengthy development review processes, and pushback against multifamily housing from members of the community.

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

WATER/WASTEWATER CONNECTION FEES

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

NAVIGATING NIMBYISM FOR MULTIFAMILY HOUSING

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

INTERNAL DEVELOPMENT REVIEW PROCESS

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

Additionally, the City has recently filled many roles within the Community Development Department, including Permit Technicians, Building Inspectors, the Chief Building Official, Administrative Support, and City Planners. The City plans to fully staff its Community

Development department in 2021, with additional positions being requested in the 2022 City budget.

ATTRACTING AND MAINTAINING AFFORDABLE HOUSING

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

AP-85 Other Actions – 91.220(K)

Introduction:

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

Actions planned to address obstacles to meeting underserved needs

Residents and stakeholders who participated in this planning process noted several underserved needs in Commerce City, including affordable housing, homelessness housing and services, and public facilities and services. Obstacles to meeting underserved needs include:

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

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

1. Establishing community resource navigation and/or a reproducible resource guide;
2. Entering the Adams County HOME Consortium to provide additional affordable housing;
3. Providing basic services for people experiencing or at risk of homelessness;

4. Continuing with the award-winning Domestic Violence Victim Program's services to prevent homelessness and reduce crime;
5. Partnering with Kids in Need of Dental to fund staff and services for LMI families to access pediatric dental services; and
6. Providing wrap-around family support services through a partnership with A Precious Child.

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

- Domestic Violence Victim Support
- A Precious Child – Family Support
- Kids In Need of Dentistry
- Homeless Outreach Supplies
- Minor Home Repair Program
- Paint-a-Thon
- Fitness Court

Actions planned to foster and maintain affordable housing

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

Commerce City expects to join the Adams County HOME Consortium for a three-year term beginning with the 2022 program year. The objectives of the HOME program are to ensure long-term affordability of housing and to target assistance to households with less than 80% of area median income. Eligible activities include homeowner rehabilitation, repair, and reconstruction; homebuyer activities such as acquisition, rehabilitation, new construction, and down payment assistance; rental housing acquisition, rehabilitation, and new construction; and rental assistance.

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

Projects to increase housing affordability in the 2021 program year include:

- Minor Home Repair Program
- Paint-a-Thon

Actions planned to reduce lead-based paint hazards

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

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

Actions planned to reduce the number of poverty-level families

The City of Commerce City's anti-poverty strategy focuses on helping all low-income households improve their economic status and remain above the poverty level. To assist city residents the City will foster institutional cooperation and communication.

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

- The City will submit a budget proposal to hire and train a Community Resource Navigator in 2022.
- The Commerce City Small Business Resource Center works with several non-profits to provide workshops, trainings, and one-on-one counseling to support start-ups and to provide technical assistance to small businesses.
- The Adams County Workforce and Business Center provides resources for job seekers, youth, and businesses in Adams County;
- The nonprofit organization Adelante Community Development provides resources and events for Latino businesses in Commerce City;
- Cultivando provides Latino advocacy, family support services, and health equity building;

- The Commerce City Community Campus (C4) provides a centralized location for health and social services in Commerce City;
- Community Resource Network will continue to be co-hosted by the CDBG Office; and
- The City provides numerous other public services assisting Commerce City residents and businesses.

Actions planned to develop institutional structure

The City will also continue to work within existing partnerships and coalitions, such as the Continuum of Care, to work toward meeting local housing and service needs. The City of Commerce City will continue to work closely with state and local agencies and governments, nonprofit organizations, and other service providers to coordinate the delivery of services to city residents. The City will submit a budget proposal to hire and train a Community Resource Navigator in 2022.

This year the City will complete its next Comprehensive Plan out to 2045. The Community Development Department is consulting various housing, homelessness, social service, elderly, and disability resource agencies to gather data and identify service gaps.

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

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

Program Specific Requirements

AP-90 PROGRAM SPECIFIC REQUIREMENTS – 91.220(L)(1,2,4)

Introduction:

The estimated percentage of CDBG funds used for activities benefiting persons of low- and moderate-income over the one year covered by this 2021 Annual Action Plan is 70%.

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

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

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

Other CDBG Requirements

1. The amount of urgent need activities	\$0
2a. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit – A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70%
2b. Specify the years covered that include this Annual Action Plan.	PY 2021 (October 1, 2021 – September 30, 2022)