



City of Commerce City,
Colorado

Community Development Block Grant

2023 Annual Action Plan

DRAFT

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

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Executive Summary

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

1. Introduction

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

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

The AAP represents a cooperative effort between the City of Commerce City, its residents, area businesses, and non-profits serving the Commerce City area. It outlines the City's needs, goals, and strategies for the 2023 AAP funding year and provides information on how citizens were involved in the process. The projects developed in this plan target a wide range of issues, which include affordable housing, quality of life issues, crime prevention, neighborhood revitalization, and helping seniors maintain their homes. PY 2023 will start on October 1, 2023 and end on September 30, 2024.

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

2. Summarize the objectives and outcomes identified in the Plan

Commerce City developed its five-year strategic plan based on an analysis of the data presented in the Consolidated Plan and the community participation and stakeholder consultation process. Through these efforts, the City identified priority needs and associated goals to address those needs for the five year planning period. To further the five-year, the City has identified in PY 2023 the following needs and goals:

Priority Need 1: Public Services

Goal: Provide Services & Resources for LMI Residents - Provide public services to stabilize low- and moderate-income individuals and households and/or those with special needs (elderly, persons with a disability, homeless) and increase their access to opportunity. Outcome: Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted

Priority Need 2: Housing and Homelessness

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

Priority Need 3: Public Infrastructure

Goal: Improve Public Infrastructure - Improve access to public facilities and infrastructure to benefit low- and moderate-income households and communities. Outcome: N/A. No goals for PY 2023 as the City will focus on Public Services and Housing and Homelessness.

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

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

3. Evaluation of past performance

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

According to the most recent PY 2021 CAPER, the City made significant progress in its housing and community development goals. These accomplishments are listed below:

Minor Home Repair: In PY 2021 the City assisted 15 LMI owner-occupied households with single-family housing rehab activities through the Minor Home Repair Program (MHRP) (9 LMI households) and Arapahoe County Weatherization Program (6 LMI households). The weatherization program helps LMI households make their homes more energy efficient and this includes new refrigerators, insulation with vapor barriers, CO detectors, light bulb replacement, window and door weatherization, and thermostat replacements. The City continues to make progress in assisting LMI households with housing preservation in the City and will continue to offer this important benefit.

Public Facilities and Infrastructure Improvements: The City assisted 1,045 persons living in low/mod areas with facility improvements at the PRG Fitness Court. Improvements included new park equipment installation that would benefit all residents. This activity exceeded established goals for the year and the City will continue to make improvements to facilities that benefit low/mod residents.

Public Services and Homeless Prevention: The City and its partners assisted 165 LMI persons with vital public services that helped to improve their quality of life. These included services for one (1) persons with a disability at the Audio Information Network, 50 LMI elderly at the Senior Hub Material Aid Boxes, and with CDBG-CV funds assisted 18 LMI households with Rent/Mortgage/Utility assistance payments through Access Housing. To help with homeless prevention, the Commerce City Police Department's Domestic Violence Victim Support Program (DVV) helped 96 victims of domestic violence avoid homelessness with essential financial support which may include rent, mortgage and utility payments.

CDBG-CV Activities

As mentioned above, the City with Access Housing, assisted 18 LMI households with rental and mortgage subsistence payments. These households were financially impacted by the pandemic, and emergency payment assistance for rents and mortgage payments helped them avoid homelessness in this time of crisis.

4. Summary of Citizen Participation Process and consultation process

The City closely followed its HUD approved Citizen Participation Plan in soliciting citizen input for the PY 2023 AAP. There were two public hearings held so City residents could offer input into how proposed projects and activities fit with the City's housing and community development needs. A public comment period was held to give citizens an opportunity to review and submit written comments on the AAP.

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

5. Summary of public comments

All comments will be considered by the City. A summary of comments made by the public will be provided after the public hearing and public comment period. A summary will also be provided in the AP-12 Citizen Participation and the attachments in the AD-26.

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

All comments will be accepted.

7. Summary

The 2023 AAP is the third year of the 5-Year 2021-2025 Consolidated Plan. The City anticipates receiving CDBG funds in the amount of \$383,627 for the 2023 fiscal year (October 1, 2023 – September 30, 2024). As identified by data analysis in the Consolidated Plan and by citizen participation, the plan will address the priority needs in the community.

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

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

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

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

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information

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

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

1. Introduction

The PY 2023 AAP citizen participation process includes extensive consultation with members of the public, community stakeholder organizations, other City departments, and CDBG staff throughout the City of Commerce City. Consultation is a vital component of the planning process. It's through these discussions, that the City can identify the unmet community needs, in particular the needs of low- to moderate-income households and special needs groups. Consultation gathered from the Consolidated Plan's citizen participation process helped to form the basis of the Strategic Plan which identified the priority housing and community development needs and the goals of the City, including the goals in this PY 2023 AAP.

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

During the Consolidated Plan community engagement process, the City strove to engage with housing providers and health, mental health, and other service organizations and agencies. Stakeholders were invited to attend public input sessions, participate in individual interviews or focus groups, and/or provide input on housing and community needs through the project website. Housing, health, mental health, and other service providers that participated in the planning process include Access Housing, Almost Home, Colorado Access, Colorado Consumer Health Initiative, Colorado Orthodontic Foundation, Kids First Health Care, Kids in Need of Dentistry (KIND), Let Your Light Shine, Mercy Housing, St. Vincent de Paul-Commerce City Chapter, Tri-County Health, Denver Regional Council of Governments, Adams County Community and Economic Development, Commerce City Housing Authority, Maiker Housing, Catholic Charities, Salvation Army, Habitat for Humanity, Brothers Redevelopment, Rebuilding Together Metro Denver, Metro Denver Homeless Initiative, PASCO (Personal Assistance Services of Colorado, A Precious Child, Salud Family Health Centers, and State of Colorado Office of Homeless Initiatives. These efforts helped to inform the City of the community and housing needs in the City, and continue to be the basis of the PY 2023 AAP.

The City also remains engaged with 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. When the City makes its annual CDBG project selections, it will consider how proposed activities connect public and assisted housing residents with health, mental health, and other services.

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

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

The Metro Denver Homeless Initiative leads the Coordinated Entry System (CES), which helps to ensure that people experiencing homelessness have equitable access to the housing resources they need to resolve their housing crisis. Persons in need can enter CES through one of the many access points throughout the Denver metro area, and individuals and families located in Commerce City may visit ACCESS Housing at 6978 Colorado Blvd. to be entered into CES.

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

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

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

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

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

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

Table 2 – Agencies, groups, organizations who participated

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

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

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

<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-housing Community Development Strategy</p>
<p>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The City has a partnership with the organization and is engaged in ongoing communication and coordination.</p>

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

There were no agency types not intentionally consulted. All comments were welcome and accepted.

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

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

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	City of Commerce City	Goals of the Comprehensive Plan that overlap with the goals of the Strategic Plan include: Reinvest in and rehabilitate aging housing stock, Increase housing types to meet current and future needs, Increase the range of housing prices, Ensure neighborhood accessibility to all modes of travel, Strengthen existing neighborhoods through reinvestment and assistance with renewal efforts, Promote regular physical activity by providing safe, convenient opportunities for recreation and human-powered travel, Improve access to health care facilities, programs, and human services, encourage increased access to healthy foods for all residents, Build and maintain parks to enhance neighborhoods and meet current and future generation needs, Increase year-round active recreation opportunities and Increase educational options for life-long learning
Economic Development Strategic Plan (2010)	City of Commerce City	Goals of the Economic Development Strategic Plan that overlap with goals of the strategic plan include: Conduct in-depth research to determine occupations and skill sets most in demand by the targeted industries; Ensure that employer feedback about workforce strengths and weaknesses is periodically gathered through City-employer programs and communicated to area workforce development providers; Elevate high school graduation rates and technical training among area residents; and Increase local employer understanding and utilization of workforce development programs.
Walk.Bike.Fit Commerce City (2012)	City of Commerce City	Goals of the Walk.Bike.Fit plan that overlap with goals of the Strategic Plan include: As recommended in the current Parks and Recreation Master Plans and other documents, create a system of outdoor civic spaces that are destinations for active travel.
City of Commerce City Housing Needs Assessment	City of Commerce City	The Housing Needs Assessment notes several housing issues in Commerce City, including a housing affordability gap, lack of diversity in the city's housing stock, and a growing homeless population.

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

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

In implementing its AAP, the City of Commerce City will continue to work with Adams County Community and Economic Development, Commerce City Housing Authority, Maiker Housing, Arapahoe County

Weatherization Division, City of Westminster, City of Thornton, and Adams County school districts 14 and 27J. The City will continue coordinating with regional organizations serving the Denver region and relevant state agencies, including the Metro Denver Homeless Initiative, the State of Colorado Office of Homeless Initiatives, and the Adams County Workforce and Business Center.

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

AP-12 Participation – 91.105, 91.200(c)

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

Commerce City has a Citizen Participation Plan that it follows closely in soliciting citizen input for the PY 2023 AAP. A series of public hearings were held so members of the public could offer input into how proposed projects and activities fit with the City’s housing and community development needs identified in the five-year Strategic Plan. A public comment period was held to give citizens an opportunity to review and submit written comments on the AAP. Members of the public were encouraged to share their views and ideas on the AAP and upcoming planning year.

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

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
1	Public Hearing	Non-targeted/broad community	A public hearing will be held on June 5, 2023 at 6:00 PM to discuss the 2023 AAP. City Council meetings are held in the Council Chambers, Civic Center, 7887 E. 60th Ave Commerce City, CO 80022. The meeting will also be held live on Channel 8 and c3gov.com/video . Visit c3gov.com/council for how to access the public hearing and instructions on how to comment at meetings. For more information, please contact the City Clerk's office at (303) 227-8797.	All will be comments accepted. A summary of comments will be included after the public hearing.	All will be comments accepted.	
2	30 Day Public Comment Period	Non-targeted/broad community	A 30-day public comment review period was held from June 16, 2023 to July 17, 2023 to allow the public an opportunity to review and make comments on the draft 2023 AAP. The plan is available on the City website and at the Community Development Department office. Written comments can be sent to Community Development Department, Commerce City Civic Center, 7887 E. 60 th Avenue, Commerce City, CO 80022 or emailed to glewis@c3gov.com	All will be comments accepted. A summary of comments will be included after the public comment period.	All will be comments accepted.	
3	Public Hearing	Non-targeted/broad community	A public hearing will be held on July 17, 2023 , during City Council in the Council Chambers, Civic Center, 7887 E. 60th Ave Commerce City, CO 80022. The meeting will also be held live on Channel 8 and c3gov.com/video . Visit c3gov.com/council for how to access the public hearing and instructions on how to comment at meetings. For more information, please contact the City Clerk's office at (303) 227-8797.	All will be comments accepted. A summary of comments will be included after the public hearing.	All will be comments accepted.	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

In PY 2022, the City of Commerce City anticipates it will receive \$383,627 in CDBG funds for its community development projects. CDBG funds will help to address the goals outlined in the AAP that address the needs identified in the Consolidated Plan. PY 2023 is the fourth program year of the Consolidated Plan, and the City anticipates a similar amount to be allocated in the upcoming final year of the Consolidated Plan period.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	383,627	0	0	383,627	383,627	This PY 2022 AAP is the third year of the 5-year ConPlan. The expected amount available for the remainder of the ConPlan is 1x more years of the annual allocation.

Table 5 - Expected Resources – Priority Table

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

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

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

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

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Provide Services & Resources for LMI Residents	2021	2024	Homeless Non-Homeless Special Needs Non-Housing Community Development	Citywide	Public Services	CDBG: \$57,544	Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
2	Provide, Preserve, and Support Affordable Housing	2021	2024	Affordable Housing	Citywide	Housing and Homelessness	CDBG: \$249,358	Homeowner Housing Rehabilitated: 20 Household Housing Unit
3	Planning and Administration	2021	2024	Non-Housing Community Development	Citywide	Affirmatively Further Fair Housing Choice Program Administration and Planning	CDBG: \$76,725	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Provide Services & Resources for LMI Residents
	Goal Description	Provide public services to stabilize low- and moderate-income individuals and households and/or those with non-homeless special needs and increase their access to opportunity.
2	Goal Name	Provide, Preserve, and Support Affordable Housing
	Goal Description	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.
3	Goal Name	Planning and Administration
	Goal Description	Administration and planning functions associated with the CDBG program. Fair Housing outreach and training.

Projects

AP-35 Projects – 91.220(d)

Introduction

The PY 2023 AAP projects are identified below. CDBG will fund projects that will provide positive outcomes for affordable housing preservation and providing vital supportive services for LMI and special need groups. CDBG has a 20% grant cap for administrative costs and a 15% grant cap of the total allocation to fund public service programs. All the projects with planned activities are intended to serve the City’s LMI and special needs population.

Projects

#	Project Name
1	CDBG: Administration
2	CDBG: Housing Programs
3	CDBG: Public Services

Table 7 - Project Information

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

All activities listed will help address a priority need identified in the 2021-2025 Consolidated Plan. 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. Based on this information, the City’s internal team of CDBG advisors rated housing and homelessness a high priority need. Therefore, PY 2023 CDBG funding will primarily go towards addressing affordable housing preservation.

Also, during the public input process, the vast majority of needs were related to public services. The demand for funding among local organizations so far exceeds the amount of available funding, and partly due to this the City’s internal team of CDBG advisors rated public services a high priority need. However, for CDBG there is a 15% grant cap of the total allocation that can be used to fund public services.

Citizens in the public input process named public infrastructure improvements they would like to see in their communities in the areas of transportation, pedestrian improvements, park improvements, broadband access and streetscaping. The size of the allocation available to Commerce City relative to the cost of large-scale infrastructure projects minimizes the ability for significant CDBG impact in the area of public infrastructure. While the City recognizes this need, and will address these needs as they arise, the City may not fund these activities in every year of the 5-year planning period.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG: Administration
	Target Area	Citywide
	Goals Supported	Planning and Administration
	Needs Addressed	Administration & Planning
	Funding	CDBG: \$76,725
	Description	Administration and Planning of CDBG funds for PY 2023.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	7887 E. 60th Ave, Commerce City, CO 80022
	Planned Activities	General program administration and planning (21A).
2	Project Name	CDBG: Housing Programs
	Target Area	Citywide
	Goals Supported	Provide, Preserve, and Support Affordable Housing
	Needs Addressed	Housing and Homelessness
	Funding	CDBG: \$249,358
	Description	Funds will be used to rehabilitate homes for health, safety, accessibility, and energy efficiency. Additional activities include exterior residential painting and accessibility improvements for seniors and disabled residents.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Homeowner Housing Rehabilitated: 20 Household Housing Unit
	Location Description	Citywide, eligible.
	Planned Activities	Planned activities include: Minor Home Repair programs (14A): \$249,358

3	Project Name	CDBG: Public Services
	Target Area	Citywide
	Goals Supported	Provide Services & Resources for LMI Residents
	Needs Addressed	Public Services
	Funding	CDBG: \$57,544
	Description	Public services that will target and benefit low- to moderate-income households and special needs groups such as persons at-risk or experiencing homelessness. The total amount allocated to public services may not exceed 15% of the total grant award.
	Target Date	9/30/2024
	Estimate the number and type of families that will benefit from the proposed activities	Public service activities other than Low/Moderate Income Housing Benefit: 300 Persons Assisted
	Location Description	Citywide, eligible.
	Planned Activities	Planned activities include services for: A Precious Child (05D): \$25,000 Homeless Prevention Programs (03T): \$32,544

AP-50 Geographic Distribution – 91.220(f)

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

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

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

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

Geographic Distribution

Target Area	Percentage of Funds
Citywide	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

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

Direct services will be targeted to LMI and special needs groups citywide by eligibility and need. Based on the income of the residents and the age of the homes most the CDBG-funded housing rehabilitation work will take place in the Core City. 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

To meet the affordable housing preservation needs for our residents, the 2023 AAP will continue to fund the housing rehab programs to assist altogether 20 LMI households. Specific activities the City will fund are the Minor Home Repair Program and the Paint-a-Thon Program, which will assist owner occupied homes remain affordable to their LMI occupants.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	20
Special-Needs	0
Total	20

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	20
Acquisition of Existing Units	0
Total	20

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

Discussion

The Minor Home Repair Program (MHRP) will grant up to \$10,000 in rehabilitation costs plus PPE and project delivery costs to rehabilitate LMI single-family, owner-occupied housing. The City will engage the services of a subrecipient to continue to assist in the operations of the MHRP. This program will prioritize the repair work based on improving the safety, health, energy efficiency, and accessibility of the residents in their homes. Service referrals may also be offered for homeowners to provide useful tools for the long-term maintenance and repairs of their homes.

The Brothers Redevelopment, Inc., Paint-a-Thon Program (PAT) will paint the exterior of owner-occupied housing, improve accessibility, and provide yard clean-up for the disabled and/or seniors homeowners. Brothers Redevelopment, Inc. will advertise, promote, qualify, equip, and organize the volunteers for each home activity. The CDBG funds will be used to purchase the paint, supplies and PPE supplies to perform the above activities.

AP-60 Public Housing – 91.220(h)

Introduction

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

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

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

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

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

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

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

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

homeownership skills and refer to other resources.

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

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

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

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

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

Introduction

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

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including: Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

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

Projects to support homeless outreach in PY 2023 include:

- Establishing community resource navigation and/or a reproducible resource guide; and
- Continuing to provide homeless outreach supplies, including basic supplies and services for the City's homeless navigator to meet and assist people experiencing homelessness. The homeless navigator collaborates with city departments and external organizations to coordinate homeless navigation efforts to individuals and families in need of services and support within the City.

Addressing the emergency shelter and transitional housing needs of homeless persons

While the City does not plan to directly fund any emergency shelter and transitional housing projects with CDBG funds in PY 2023, the City will continue to support and help to expand the availability of homeless services and housing through providers such as Access Housing, Almost Home, and other providers. These homeless service providers will continue to provide emergency and transitional for people experiencing homelessness.

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

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to

permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

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

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

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

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

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

Introduction:

When the City developed its Consolidated Plan, it conducted extensive citizen participation to gather public input on priority needs in the city. Through this citizen participation process, the City was able to identify several barriers to affordable housing, including increasing water and wastewater connection fees, lengthy development review processes, and 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. The City will continue to assess water and wastewater connection fees.

Navigating NIMBYism for Multifamily Housing

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

Internal Development Review Process

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

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

being requested in this year's 2023 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 Minor Home 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 ConPlan process noted several underserved needs in Commerce City, including affordable housing, housing and services for homeless populations, and public facilities and services. Obstacles to meeting underserved needs include:

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

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

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

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

Actions planned to foster and maintain affordable housing

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

Organizations or other developers considering housing projects in the city.

Commerce City 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 continuation of the ongoing Minor Home Repair Program, Paint-a-Thon, and rental and mortgage assistance programs.

Projects to increase housing affordability in the 2023 program year include:

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

Actions planned to reduce lead-based paint hazards

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

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

Actions planned to reduce the number of poverty-level families

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

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 2023.
- 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 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 delivery of services to city residents.

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

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

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

The City of Commerce City will continue to be an active participant in the Metro Denver Homeless Initiative. The Continuum of Care brings together nonprofit, government, and business leaders to provide a shared approach to goals of ending homelessness. Membership includes emergency, transitional, and

permanent housing providers; nonprofit social service organizations; and government agencies.

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

Program Specific Requirements

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

Introduction:

The estimated percentage of CDBG funds used for activities benefiting persons of low- and moderate-income over the one-year period covered by the 2023 Annual Action Plan is 100%. The City does not expect to generate any program income through its program activities.

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

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

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

Other CDBG Requirements

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