



PY 2023 Consolidated Annual Performance and Evaluation Report (CAPER)

DRAFT

City of Westminster
Economic Development Department
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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)

This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

The City of Westminster is an entitlement jurisdiction that receives an annual allocation of Community Development Block Grant (CDBG) program funds through the U.S. Department of Housing and Urban Development (HUD). These funds help the City address the housing and community development objectives outlined by HUD, which include, but are not limited to: affordable housing preservation, public improvements, and vital public services for special needs and low- to moderate-income (LMI) populations. PY 2023, October 1, 2023 - September 30, 2024, is the fourth year of the City's 2020-2024 Consolidated Plan (ConPlan), and accomplishments are summarized below:

Affordable Housing: The City assisted a total of 119 LMI households through its housing rehab programs. Of this total, there were 13 homeowner households assisted through the Emergency and Essential Home Repair Program's Foothills Regional Housing activity (#1263) and the Brothers Redevelopment activity (#1269). Also, included in the total assisted were 106 rental households assisted through the Housing Lift program's East Bay Senior Housing Brothers Redevelopment activity (#1266) and Maiker Housing Partners' Westchester Apartments activity (#1267).

Public Facilities and Infrastructure Improvements: The City made improvements to public facilities that had a low/mod areawide benefit to 7,625 persons. These improvements were associated with the 73rd and Lowell Community Event Space activity (#1258).

CDBG-CV funded activities are provided in more detail below in this section.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee’s program year goals.

Goal	Category	Source	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration	Administration	CDBG	Other	Other	1	1	100.00%	1	1	100.00%
Fair Housing Action Plan	Affordable Housing	CDBG	Other	Other	0	0	0.00%			
Homeless Resident Support	Homeless	CDBG	Housing for Homeless added	Household Housing Unit	1	38	3800.00%			
Infrastructure and Streetscape Improvements	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	400	400	100.00%			
LMA Benefitting Community Event Space	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	200	7625	3812.50%			
Preserve and Expand Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG	Rental units constructed	Household Housing Unit	200	0	0.00%			

Preserve and Expand Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG	Rental units rehabilitated	Household Housing Unit	25	106	424.00%	100	106	106.00%
Preserve and Expand Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	25	75	300.00%	18	13	72.22%

Table 1 - Accomplishments – Program Year & Strategic Plan to Date

Assess how the jurisdiction’s use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

PY 2023 is the fourth year of the City’s 2020-2024 Consolidated Plan period, and the City has identified the following priority needs for the community: Increase and Preserve Affordable Housing; and Infrastructure, Streetscape and Ped Improvements. CDBG funded activities must address one of these needs as well as primarily benefit low- and moderate-income persons or special needs populations.

CDBG funds focused on affordable housing rehab in PY 2023. Affordable housing rehab activities included minor rehab of existing affordable housing of both rental and homeowner housing. The following is a distribution of CDBG funds by priority in PY 2023:

Affordable Housing (residential rehab): \$376,550.73 (80.9%)

Administration of the CDBG Program: \$89,170.77 (19.1%)

Total CDBG expenditures in PY 2023: \$465,721.50

PY 2023 Goals and Actual Accomplishments Comparison

Administration: The City provided effective program management of the CDBG program in PY 2023, which included maintaining program compliance, affirmatively furthering fair housing, and planning of the program.

Preserve and Expand Affordable Housing: The City had a goal to assist 100 households with renter housing rehab through the Housing LIFT

program, and 18 households with homeowner housing rehab through the Emergency and Essential Home Repair Program. The City met its goal to assist renter households with 106 households assisted, however it fell short of its homeowner housing goal with 13 assisted. The City prioritizes this need, and identifying homeowners for this service will be ongoing until the goal is met.

CDBG-CV Activities in PY 2023

The City of Westminster received CDBG-CV funding as a result of the Coronavirus Aid, Relief, and Economic Stability Act (CARES Act) signed into law during March of 2020. CARES Act CDBG-CV funds were allocated to the City in the total amount of \$873,207. CDBG-CV funds were intended to support activities that prevent, prepare for and respond (PPR) to COVID-19. The City used these funds to support small businesses, a food pantry to serve those sheltering, and homeless assistance for those impacted by the pandemic. As of PY 2023, all these activities have been completed successfully, and all CDBG-CV grant funds have been expended. A PR-26 CDBG-CV financial report and PR-02 List of CDBG-CV activities has been uploaded as attachment to this report as supporting documents.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted).
91.520(a)

	CDBG
White	111
Black or African American	5
Asian	1
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	1
Total	118
Hispanic	47
Not Hispanic	72

Table 2 – Table of assistance to racial and ethnic populations by source of funds

Narrative

DATA NOTE: The Table above does not include a category for people of “other or multiple races” therefore the numbers in the above table do not necessarily match the number of people actually served through the City’s CDBG program. It should also be noted that activities such as public facility and infrastructure benefit low/mod income “areas”, and the race/ethnicity of persons assisted with these services are not recorded.

According to the most recent 2018-2022 American Community Survey (ACS) 5-Year Estimates, the population in Westminster was 115,502 persons. White persons account for 77.4% of the total population. An estimated 4.9% were Asian, 1.5% were Black, 1.0% were American Indian and Alaskan Natives, 3.8% were “Other” and 11.2% were “Two or more” races. All other races were less than 1%. Individuals that identified as ethnically Hispanic (of any race) account for 24.1% of the citywide population. Below is an assessment of services for minority groups by program.

The table above shows 118 assisted with CDBG, however the actual total was 119 persons that were served with CDBG funds during PY 2023. The data table does not have a category for “Other multiracial” of which the City also assisted 1 person. The percent of persons assisted by race in the CDBG program were 93.3% White, 4.2% Black, and 0.8% as Asian. Of the total reporting ethnicity 39.5% were Hispanic. The City adequately assisted the black and the Hispanic population with CDBG, however there is a need to address the needs of all other minority groups in the City.

Housing Needs Assessment

As a HOME Consortium member, the City did not complete a full housing needs assessment as part of its Consolidated Plan; however, the City identified housing preservation as a priority in the plan. The City continues to reach out to the most underserved populations in Westminster. In PY 2024, there were 119

households assisted with housing rehab activities. An estimated 93.3% were White, 4.2% were Black, and 0.8% were Asian. For those reporting ethnicity, 39.5% were Hispanic. Due to the small number of minority households in Westchester, not all of the smaller minority groups can be assisted.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	577,464	465,722

Table 3 - Resources Made Available

Narrative

The table above shows the resources made available for PY 2023 and amounts expended in the CDBG programs. In PY 2023, the City had a total of \$577,464 in CDBG funds, made available from the annual allocation. The City expended \$465,722 in CDBG funds (including funds carried over from previous year) on housing rehab activities and admin of the program. Details of the uses of funds are listed below:

Affordable Housing (residential rehab): \$376,550.73 (80.9%)

Administration of the CDBG Program: \$89,170.77 (19.1%)

Total CDBG expenditures in PY 2023: \$465,721.50

Please note, the City follows strict grant based accounting guidelines. For each FY CDBG grant allocation, there is a maximum spending cap of 15% for public services, and 20% for administrative costs. The City ensures it will not spend more than the 20% max allowable for the FY grant awards.

CDBG-CV Funds

The City of Westminster received CDBG-CV funding as a result of the CARES Act signed into law during March of 2020. CARES Act CDBG-CV funds were allocated to the City in the total amount of \$873,207. As of PY 2023, all CDBG-CV grant funds have been expended successfully. A PR-26 CDBG-CV financial report and PR-02 List of CDBG-CV activities has been uploaded as attachment to this report as supporting documents.

FY CDBG Grant Allocation Close-Out

In PY 2023, the City fully expended FY 2017 (B17MC080010), FY 2018 (B18MC080010) and FY 2019 (B19MC080010) CDBG EN funds. The final voucher for the FY 2017 grant was drawn on 6/26/2024, FY 2018 was drawn on 2/1/2024, and FY 2019 was drawn on 6/26/2024. FY funds were allocated towards LMA and LMH national objectives. As per grant guidelines, the City did not exceed its admin grant cap in any of the FY grants. The City did not have any public service projects. The City will contact its HUD office to initiate the grant close out process for FY 2017, FY 2018 and FY 2019 CDBG EN grant funds as noticed by CPD-22-14.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City-Wide	100	100	Housing rehab by eligibility.

Table 4 – Identify the geographic distribution and location of investments

Narrative

In PY 2023, 20% of the CDBG funding was budgeted for administration, and the balance of funds was applied to housing rehab activities citywide.

While there were no funds spent on public facilities and infrastructure improvements in PY 2023, the City completed an activity started in a previous year. For the purpose of identifying activities for public facilities or infrastructure improvements, the City uses low- and moderate- income census block group tract areas as identified by HUD’s CDBG Low Mod Income Summary Data (LMISD). In PY 2023, the City completed improvements to public facilities that had a low/mod areawide benefit to 7,625 persons. These improvements were associated with the 73rd and Lowell Community Event Space activity. HUD CDBG LMISD data can be found at <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

The City of Westminster's CDBG allocation is complemented by several additional resources. The primary resources are: 1) the City's Capital Improvement Program, which is used for major capital projects; 2) HOME funds, allocated through the Adams County Consortium; and 3) a limited amount of departmental operating funds that may be utilized for certain contract services. In addition, the City utilizes Private Activity Bond (PAB) capacity, which provides roughly \$6 million per year for housing activities.

When requested, the City assigns its PAB capacity to the Colorado Housing and Finance Authority (CHFA) for administration. The City also supports applications by developers for both 4% and 9% Low Income Housing Tax Credits (LIHTC) by contributing through tax and fee rebates. These are negotiated based on specific project needs and administered through Economic Development Agreements (EDA).

The City's 2023 PAB capacity was assigned to the Adams County Public Housing Authority (dba Maiker Housing Partners) in support of their Low-Income Housing Tax Credit (LIHTC) application to construct 70 units of affordable housing. This was the second PAB assignment to this project. The proposed multi-family property will focus on families with disabilities and includes a Head Start program that will occupy a section of the main-floor commercial-retail area. The project is still working through the City's land use review process.

An additional housing development has been filed for City approval on the property adjacent to the Maiker development described above. Both proposed developments are part of a large master-planned community known as Uplands. The Uplands filing is required to provide at least 300 units of affordable housing before the master-development is 50 percent complete. Both the Maiker property and the St. Charles property will satisfy this requirement.

Both the Maiker proposed development and the St Charles development will be supported Low Income Housing Tax Credits (LIHTC), and both developers have extended their land use-restriction agreement (LURA) under their LIHTC contract with CHFA to maintain affordability for 35 years.

One additional affordable for-sale townhouse project has been filed with the City by Elevations Community Land Trust. The proposed development is in the Bradburn neighborhood in north-central Westminster. The Bradburn neighborhood was designed as a new-urbanist walkable community with significant access to stores and dining. This development will provide 29; two-to-four-bedroom townhomes for residents earning up to 80% Area Median Income. The City is working closely with the developer to support their application and fund assembly and will provide gap financing.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

	One-Year Goal	Actual
Number of homeless households to be provided affordable housing units	0	0
Number of non-homeless households to be provided affordable housing units	118	119
Number of special-needs households to be provided affordable housing units	0	0
Total	118	119

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance	0	0
Number of households supported through the production of new units	0	0
Number of households supported through the rehab of existing units	118	119
Number of households supported through the acquisition of existing units	0	0
Total	118	119

Table 6 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Table 1 (Number of Households): For the first table, the City had a goal to assist 119 non-homeless households with affordable housing units. Non-homeless households are served through the CDBG housing rehab programs, and 119 LMI households were assisted.

These activities include 13 LMI homeowner households assisted in the Emergency and Essential Home Repair Program's Foothills Regional Housing activity (#1263) and the Brothers Redevelopment activity (#1269). There were also 106 LMI rental households assisted through the Housing Lift program's East Bay

Senior Housing Brothers Redevelopment activity (#1266) and Maiker Housing Partners' Westchester Apartments activity (#1267).

Table 2 (Number of Households Supported): For the second table, there was a goal to assist 118 households with housing rehab activities. As noted above there were 119 LMI households assisted through the housing rehab programs. The following is a breakdown of accomplishments by activity.

Homeowner Housing Rehab: 13 owner-occupied households assisted

1263 - Emergency and Essential Home Repair Program - Foothills Regional Housing (3) LMH

1269 - Emergency and Essential Home Repair Program - 2021 Brothers Redevelopment, Inc (10) LMH

Rental Housing Rehab: 106 renter-occupied households assisted

1266 - Housing Lift - East Bay Senior Housing Brothers Redevelopment (86) LMH

1267 - Housing Lift - Westchester Apts. - Maiker Housing Partners (20) LMH

Note: This section reports on affordable housing activities that meet the terms that are defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership as applicable to the select activities.

Discuss how these outcomes will impact future annual action plans.

Affordable housing preservation remains one of the highest priorities in the City of Westminster. The City's current and past CDBG-funded projects have focused on community needs, such as aging housing stock and infrastructure. The activities and projects proposed in the 2023 AAP and the goals for the five-year planning period continue to promote the most efficient and effective use of CDBG funds, while also investing in neighborhood improvements such as preserving and expanding the supply of affordable housing.

The City's CDBG program history and past investments, coupled with input gathered through the citizen participation process, guided the development of the goals and objectives for the 2020-2024 Consolidated Plan. Goals and objectives were written to be broad enough to include a wide array of projects and activities. As eligible housing activities under the CDBG program are limited to housing rehab and acquisition, and other uses under special circumstances, housing preservation will remain the focus of the City's housing goals with CDBG funds.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

Number of Households Served	CDBG Actual
Extremely Low-income	101
Low-income	16
Moderate-income	2
Total	119

Table 7 – Number of Households Served

Narrative Information

During PY 2023 the Emergency and Essential Home Repair Program (EEHR) served 13 households, of which 8 were female head of household. Five (5) of the households served qualified as extremely low-income, 6 qualified as low-income, and 2 were moderate-income.

The Housing LIFT program served 106 households. There were no households recorded as female head of households. Ninety-six (96) of the households served qualified as extremely low-income, and 10 qualified as low-income.

The EEHR program is a flagship housing assistance program that has served Westminster residents since 2010. City leadership hears from residents who have been served by EEHR grants that this investment made a critical difference in their home safety and allowed them to make repairs they would not have been able to afford without this program. The Program works with two subrecipient contractors: Brothers Redevelopment, Inc. (BRI) serves City residents in Adams County; and Foothills Regional Housing (formerly the Jefferson County Housing Authority) handyman program serves City residents in Jefferson County.

The City promotes the EEHR program through press and strategic media announcements, promotion with non-profit partners, and through the City’s social media campaigns and website. The web-based information is available in both English and Spanish. The City has also published information about the program in the City’s utility billing inserts mailed to customers throughout the City.

The Housing LIFT program provides targeted grants to qualifying affordable housing properties for capital improvements that impact public health, safety, and welfare as a means of preserving affordable multi-family properties and protecting residents. Officially launched in early 2023, the City partnered with Brothers Redevelopment and Maiker Housing Partners to rehabilitate two existing multifamily rental properties.

Worse Case Needs

Those with worst case needs are persons or households at-risk of or experiencing homelessness and are households with extremely low-income. The City will work to target extremely low-income households with its housing programs. The City's housing rehab activities assisted 101 extremely low-income households.

At this time, there are no households with a disability targeted with housing programs. If however the City identifies a household with a member that has a disability, the City will make reasonable accommodation to allow for the participation of the household in its programs.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

The City has a full-time staff member who focuses on issues surrounding low-income community members, including people experiencing homelessness (PEH). In 2020 the City hired a full-time Homeless Navigator to provide direct outreach to unsheltered individuals and families. In that year, a second full-time Navigator was hired to better meet the needs of people experiencing homelessness. Since 2022, over one-hundred unhoused residents have been served and have been placed in permanent housing. During that same time, more than 1,000 hotel stays were provided to those who were medically fragile, in need of a non-congregant shelter on a severe weather night, or in need of stabilization while waiting to get into a more permanent housing.

During PY 2023, the Navigators continued to permanently house individuals and families and provided hotel stays as non-congregant shelter and/or bridge housing. The City also provides move-in assistance, rental assistance and -- when needed -- security deposits to assist people with vouchers who do not have enough saved up to remove that last barrier to housing.

The City of Westminster is a voting member of the Metro Denver Homeless Initiative (MDHI) Continuum of Care, with a staff member serving on three of its nine regional committees. The City also partners with all the jurisdictions in both Adams and Jefferson Counties.

The City supports the regional non-profit service providers applications for Emergency Solutions Grants (ESG) and works closely with ESG service providers to coordinate services for residents. The City has been working with local non-profit and public housing partners to connect people in need of emergency rental assistance and Emergency Housing Vouchers (EHV) to both prevent or resolve homelessness on an individual basis.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City provides hotel stays for people experiencing homelessness as well as works closely with other service providers to connect individuals and families to available transitional housing. The City's Homeless Navigators have resources to provide severe weather sheltering for individuals and families who are found out-of-doors on severe weather nights. Severe weather is defined as nights with temperatures below freezing and/or with precipitation and freezing temperatures. With the support of the City's homeless assistance staff team, the City has established partnerships with three area motels to provide rooms for unhoused residents discovered outdoors during severe weather. The City also refers PEH to Adams County's emergency weather shelters in hotels or the Severe Weather Shelter Network of non-congregant

shelters as part of regional partnerships.

The Homeless Navigators have been working with local non-profit and public housing partners to connect people in need of rapid re-housing programs to help homeless individuals.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs

The City Navigators utilize the Homeless Management Information Software (HMIS) provided by the Continuum of Care (CoC) to better serve people experiencing homelessness. As the Navigator position and program is funded only through local tax dollars, it is not a program required by HUD. Instead, the City does so to make service referrals as seamless and useful as possible for the sake of the people experiencing homelessness. When warranted, the Vulnerability Index-Service Providers Decision-Making Tool (VI-SPDAT) is conducted by the Navigator as well.

The Homeless Navigator receives referrals from probation officers of the municipal Court as people are released from jail or prison when experiencing homelessness. Increasingly, the Navigator has also worked with social workers in hospitals as patients were being discharged while experiencing homelessness. Hotel rooms or diversion strategies are sought by the Navigator, ensuring no one has been released to literal homelessness while medically fragile. The Navigator also works closely with the Police Department's Mental Health Co-Responders to find the best option for placement for those experiencing homelessness and in need of behavioral health support.

While the City does not have congregate shelter facilities within it, the City continues to identify and work with regional partners to provide transitional housing for homeless families. The Homeless Navigator staff has provided increased visibility and efficacy in the City's effort to assist individuals and families in need of housing.

The City also participates in funding with all the jurisdictions in Adams County and the City and County of Broomfield, free tenant-landlord legal assistance for low-income community members.

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

In the Denver Metro Area, most of the services targeted to assist persons who are homeless and with HIV/AIDS are provided through the State of Colorado and non-profits mostly located in central Denver. A limited number of non-profits serve the Westminster community, but their shelter facilities are not located within the City's boundaries. These non-profits serve PEH and/or those who are at risk of being homeless with services such as food, clothing, rent and utility assistance, and a small number of emergency shelter beds.

City officials during the current Consolidated Plan period have committed to participating in the MDHI-wide Built for Zero (BfZ) Initiative. In May 2021, elected officials across the region – including those of the City – met to further this initiative, focusing on reaching functional zero for veterans experiencing homelessness. Since then, the City's Navigators have been attending weekly BfZ case conferencing calls to ensure the target is achieved in both Adams and Jefferson Counties.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

The City is served by two public housing authorities (PHA): Maiker Housing Partners (formerly the Adams County Housing Authority) and Foothills Regional Housing (formerly the Jefferson County Housing Authority). Neither of these partner PHA's own any traditional federal public housing. All the properties the two PHA's own and operate have either been converted through Section 18 disposition or, have been developed and supported through a mix of federal and state tax credits, loans, and grant programs.

The City actively partners with each PHA's development team to support applications for financing and to provide added resources to address preservation, construction, and development needs. The 2020- 2024 CDBG Consolidated Plan formalized programs that will provide CDBG funding for the development of affordable housing site improvements and the preservation of affordable multi-family housing.

The preservation of affordable multi-family housing program, Housing LIFT was implemented during PY 2023 with two multi-family property applicants. One of these is owned and managed by Maiker Housing Partners. Maiker received a \$500,000 grant to perform significant rehabilitation and upgrades. Foothills Regional Housing has asked to apply for the next round of Housing LIFT grant funds to perform a similar level of rehab on a property they operate at 88th and Sheridan Blvd.

The second Housing LIFT project funded during the programs first year is owned and operated by BRI, Inc. This property also received a \$500,000 grant to replace all windows in 80 apartments. This senior property is 100 percent occupied by tenants with Housing Choice Vouchers (HCV/Section 8.)

The City refers residents seeking housing vouchers and/or subsidized housing to both of our local PHAs. City staff also promotes and participates in community education programming for our residents to strengthen local understanding of the roles the PHA's play in providing affordable housing.

The City has a program that works with local public housing authorities to provide high-efficiency water fixture upgrades. The new fixtures are EPA WaterSense certified models that use at least 20% less water than the current industry standard with the same or better level of service. The pilot program began with properties owned and operated by Maiker Housing Partners and has reached out to Foothills Regional Housing to expand the service. The project provides significant water and sewer savings for the PHA's while helping the City conserve water resources.

Additionally, the City's Sustainability Team provides grants to further educate and support low- and - moderate income renters to manage and control the energy costs and environmental impacts. Staff works with local non-profits and property manager to provide high-efficiency lightbulbs and appliance standards to guide investments and practices that conserve energy and save money for LMI residents.

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

Maiker hired and placed a Resource Navigators to assist residents in multiple properties. The Navigators strengthen communication and information-sharing between residents and provide connections to other community resources. Orchard Crossing, a project-based Section 8 property with 70 apartments has been served by a Resource Navigator since 2020. This staff person went door-to-door during the pandemic to help residents apply for housing and food assistance programs.

Maiker recently expanded their staffing to include three full-time Community Navigators and three Resource Navigators who will support a Community Council comprised of ambassadors from each managed property. The Community Council meets quarterly to advise management and work collaboratively.

Also, in PY 2023, the community navigators continued to branch out of the PHA properties to work with residents throughout Historic Westminster. Growing Home, an area non-profit providing services and resources to strengthen LMI families, provided additional staff support to increase access for navigators to meet and network while assisting local families in need of added services. The City participated in two community forums to provide the navigators with information to help residents with landlord-tenant and rental assistance questions.

Historic Westminster service providers and residents have been working to address regional food security, as local grocery outlets closed during the pandemic. Growing Home operates the largest food pantry in the City of Westminster and has been instrumental in bridging needed food security and housing advocacy for area residents during the past two years. Maiker Housing Partners also contracts with a mobile grocery service (grocery truck) to serve area residents.

Foothills Regional Housing continues to increase community engagement and convenes their Housing Choice Voucher (HCV) clients for targeted focus group-level discussions when looking for input on service and housing development proposals.

Community Resources and Housing Development Corporation (CRHDC), a HUD-certified Community Housing Development Organization (CHDO) located in Westminster, offers pre-and post-purchase homebuyer education, financial fitness counseling, foreclosure counseling and prevention, real estate services, and lending through Colorado Housing Enterprises, a Community Development Financial Institution (CDFI). These workshops are provided to public housing residents and are sometimes held in meeting rooms at local PHA properties.

The Denver Metro Fair Housing Center, Maiker Housing Partners, and Foothills Regional Housing also provide information to Adams County and Jefferson County residents about fair housing through one-on-one counseling sessions and workshops for foreclosure prevention, rental responsibilities, subsidy program briefings, and resident services.

A copy of Homebuyer Assistance guidance provided on the City's webpage is included in the Citizen Participation attachments.

Actions taken to provide assistance to troubled PHAs

The City does not have any troubled PHAs.

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

The City's 2040 Comprehensive Plan was adopted in April 2023. In coordination with the Comprehensive Plan update, staff is moving forward to rework and update development codes and standards. City staff have been working to keep the relationship of neighborhood character, land use and the cost of housing development a central consideration of this work. The 2040 Comp plan and the associated code update provides opportunities for focus areas and some neighborhoods to utilize alternative housing product types (e.g., accessory dwelling units, duplex properties) and increased density.

The City submitted a commitment to the State of Colorado to access the recently established Proposition 123 (Prop 123) affordable housing fund. Starting in 2024, the State estimates that Prop 123 will generate approximately \$350M of funds to address the State's affordable housing needs. This commitment requires the City to approve building permits to develop a minimum of 288 new affordable housing units by December 2026. The filing action allows developers working in the City to apply for an access the state housing funds.

City staff work closely with affordable housing developers and when able, provides financial assistance, typically in the form of development fees and use tax rebates to help close demonstrated funding gaps.

City staff works through state and regional legislative efforts to advance public policy to encourage the development and preservation of affordable housing for both rental and homeownership options. This is done through membership activity with Housing Colorado, efforts to support Maiker Housing Partners advocacy in support of federal and state programs, and legislative review and lobbying efforts performed on behalf of the City.

The City completed an updated Housing Needs Assessment on March 18, 2024. The information from this report will be used to inform policy and consequent code updates for the next several years.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

The City participates in several regional efforts to collaboratively identify and determine approaches to both serve residents that are experiencing obstacles attaining housing and to work with residents to obtain temporary support for emergency needs. City staff participates in the Jefferson County Homeless Navigator services program and spearheads bi-annual community outreach to conduct the Point-in-Time (PIT) homeless census and build the data and strategies to harness resources to apply to this work.

Additionally, the City provides targeted assistance for residents who are unable to pay their water bill.

The City provides both temporary payment assistance of up to \$180 and a Hardship application process for individuals or families who have experienced loss of income or due to a medical emergency.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

The City directly addresses lead-based paint (LBP) hazards and increases access to housing without LBP hazards through its EEHR program. For the City's home rehabilitation program, administered jointly by Foothills Regional Housing and Brothers, projects are generally limited to \$5,000 in hard costs. All projects that are not exempted from HUD's LBP regulations must meet HUD's under \$5,000 threshold requirements, which are as follows:

1. Notice to homeowners
2. Provision of pamphlet entitled "The Lead Safe Certified Guide to Renovate Right"
3. Paint testing of surfaces to be disturbed or presumption of LBP if the area to be disturbed exceeds the minimal ("de minimus") area*
4. Safe work practices as part of rehabilitation for all projects that exceed the minimal ("de minimus") area*
5. Repair any paint that is disturbed
6. Clearance after the work and before re-occupancy if exceeding the ("de minimus") area*

*The minimal ("de minimus") area - safe work practices and clearance is not required when maintenance or hazard reduction activities do not disturb painted surfaces that total less than 20 square feet on exterior surfaces, two square feet in any one interior room or space, or ten percent of the total surface area on an interior or exterior type of component type with a small surface (e.g., windowsills, baseboards, and trim).

In special circumstances, emergency repairs involving safety may be allowed at slightly higher costs than the standard \$5,000 maximum per property. In these cases, City subrecipients Foothills Regional Housing and Brothers must comply with HUD regulations governing rehabilitation work with costs between \$5,000 and \$25,000. This level of expenditure triggers all six steps noted above, along with the additional requirements to perform a risk assessment and interim controls, as described in 24 CFR §35 Subpart J.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

The City continues to work with both the Adams 12 and Westminster Public Schools districts to link families to opportunities in the city for both youth and parent engagement programs.

City Parks, Recreation and Library (PRL) staff have been working with a parent council in Historic Westminster since 2016 in the implementation of a parks planning process. The ongoing connection to the primarily Spanish-speaking parent council has created additional access to community resources and opportunities. This initial work group has now evolved to include a larger group of networked, Spanish-speaking household who participate in many city and local-non-profit planning processes. This year, the community navigator network focused on training and information updates to assist low- and- moderate

income residents.

Parks, Recreation, and Libraries (PRL) staff also expanded the recreation scholarship program by allowing for an unlimited number of people to apply and receive up to 90% discounts on any recreation program offered. Staff removed barriers to the scholarships by not requiring proof of need.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

The Economic Development Department is currently in the process of recruiting and staffing vacant positions that resulted from the COVID-19 pandemic, to effectively implement the CDBG programs and activities as well as support the development of affordable housing in the City.

City staff participates in the Denver Metro CDBG Users group. This group convenes all Region VIII CDBG entitlement jurisdictions quarterly to share resources and shape “best practice” information to improve upon our community development efforts.

City Council accepted the City's 2020-2024 Consolidated Plan in November 2020. The process to gather community input and develop the plan involved investigative effort to determine community needs and various measures of economic vitality. This process also identified areas where the City will need to continue efforts to educate and engage the community to address inequities.

Internally, the City continues to provide educational information regarding affordable housing initiatives and the City's application of CDBG funding to address housing and revitalization needs. Staff supports internal planning and development discussions regarding local housing needs and initiatives and seeks to educate colleagues on regional activities affecting the City's housing inventory and housing costs. Assembling this information and telling the story of housing need and what is available in our local market has helped make the City's affordable housing challenges more transparent.

The City's updated Housing Needs Assessment (HNA) was accepted by City Council in early 2024, and published on March 18, 2024. The HNA will be used to inform policy and guide development to address identified gaps and support the City's affordable housing goals.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

The Resiliency Division of the City's Economic Development Department administers the City's CDBG program and partners with affordable housing developers, both private and public. In this role, City staff coordinate with developers seeking support for LIHTC applications or other state and regional funding sources. Additionally, in certain instances, the City will provide direct financial support to close identified funding gaps and promote the financial feasibility of affordable housing projects.

City staff is working with Maiker Housing Partners on their redevelopment planning efforts for properties

held in the Westminster Station TOD and provide support for their applications for potential state and regional funding opportunities. Maiker currently is working on a land use proposal to develop 70-units of affordable housing at West 86th Avenue and Federal Boulevard.

St. Charles Town Company, a private developer, has also applied for a new 247-unit multi-family development adjacent to the proposed Maiker proposal, described above.

Foothills Regional Housing has initiated planning and financial analysis to redevelop and expand an aging affordable housing community located in southwest Westminster. Staff look forward to partnering with and supporting Foothills Regional Housing as they consider this redevelopment project.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

The City of Westminster employs three rental housing inspectors who work daily with individuals living in multi-family housing throughout the city. This staff has been trained in Fair Housing requirements and carry with them materials to help residents gain access to information to determine if they are encountering discrimination under Fair Housing.

Additional support for individuals experiencing housing discrimination is provided through a weekly free Landlord—Tenant Legal Clinic that is co-sponsored by the City of Westminster and Adams County. The clinic is hosted in multiple public facilities each week and is available by both appointment and drop in.

The City is included in the updated Analysis of Impediments (AI) plan created for the Adams County HOME consortium. This AI was completed on November 5, 2020, and continues to guide the members of the HOME consortium in affirmatively furthering fair housing for the five years of the 2020-2024 Consolidated Plan period. The impediments identified in the AI included:

- Shortage of affordable, accessible housing units.
- Discrimination in rental transactions.
- Barriers to homeownership.
- Lack of resources to address poor housing conditions.
- Disparate access to opportunity.
- Limited zoning code and land use regulations.

To address these impediments to fair housing the County developed a Fair Housing Action Plan as part the AI, which lists recommended action items on what the County can reasonably do to address these impediments and affirmatively further fair housing in Adams County. These actions can be viewed in the full documents on the County's website at: <https://www.adcogov.org/resources-reports>

Actions Taken in PY 2023

In PY 2023, the City of Westminster worked to address the following impediments identified in the AI:

Lack of resources to address poor housing conditions: The County assisted 119 LMI households with the preservation of existing housing stock through the Emergency and Essential Home Repair Program for homeowners and the Housing LIFT program for renters.

Disparate access to opportunity: The City completed neighborhood facility improvements to the 73rd and Lowell Community Event Space that will improve access for all residents. This activity was targeted to low/mod area, which will help create a suitable living area for LMI residents. Public investments will also help to invite outside resources and private investments into low/mod areas.

CR-40 - Monitoring 91.220 and 91.230

Describe the standards and procedures used to monitor activities carried out in furtherance of the plan and used to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

Management, oversight, and monitoring of the CDBG program is performed by the City's Department of Economic Development. Adams County Department of Community & Economic Development manages and monitors the HOME program. The City is committed to taking all appropriate steps, as outlined by HUD, to assure compliance with applicable laws, procedures, and eligibility requirements. CDBG funds are disbursed by the City's Finance Department. City staff perform the following activities to maintain compliance for the various programs and projects:

- Environmental review of CDBG projects
- Davis-Bacon Wage determination of individual projects and applicable compliance requirements
- Davis-Bacon Semi-Annual Reports
- Minority Business Enterprise (MBE) reports
- Program Action Plan submission
- Consolidated Annual Performance Evaluation Report (CAPER)
- Integrated Information Disbursement System (IDIS) reporting and maintenance
- Maintaining the CDBG rate of expenditure to comply with HUD spending goals
- Federal Cash Transaction Quarterly Report submissions
- City staff's program compliance calendar
- Project site visits to compare reported activity with actual accomplishments.

Project monitoring is also performed in the contract management process to ensure grantees are performing as required by the subrecipient agreements and other contracting documents. Both Economic Development staff and the City's Finance and Grants Coordinator review materials submitted by subrecipients and developer-grantees when invoices are presented and match performance to the contracted requirements.

Comprehensive Planning Requirements

The comprehensive planning requirements include the development and consolidated plan process of the 5-Year ConPlan, the AAP, and CAPER. Citizen participation is a vital part of the Consolidated Plan process and the City will make sure to follow its HUD approved Citizen Participation Plan (CPP) which helps guide the City to gather information which is an essential component in identifying the priority housing and community development needs in Westminster. These priority needs form the basis of the City's Strategic Plan in the ConPlan and annual goals and activities carried out in each subsequent AAP.

The ConPlan is developed every 5 years, with identified priority needs and goals to address these needs. Each year of the 5-Year plan, the City develops an AAP which identifies the projects and activities

that will address and further the goals of the plan. This plan is required to be submitted to and approved by HUD each year to receive CDBG funding annually. At the end of each AAP program year, the City will report on the accomplishments and performance of the program through the CAPER. Citizen participation is required in the development of each of these stages as per 24 CFR 91.105. This PY 2023 CAPER is the fourth program year of the 2020-2024 Consolidated Plan.

Citizen Participation for the 2023 AAP

The City of Westminster adheres closely to its HUD approved Citizen Participation Plan (CPP) which under 24 CFR 91.105 encourages citizens to participate in the development of the AAP. The CPP especially encourages participation from LMI residents and special need communities. The citizen participation requirements for the PY 2023 AAP included a 30-day comment period from July 6, 2023 to August 6, 2023; a Study Session with City Council held on June 19, 2023; a public input meeting held June 20, 2023; and a public hearing with the Westminster City Council held on July 24, 2023. The City's community service partners supported additional communications and outreach via client email and newsletters. Comments from the public were in support of affordable housing opportunities, services for the homeless and mental health, child care programs, and access to public transportation.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

To meet the requirements of citizen participation for the PY 2023 CAPER, as per 24 CFR 91.105, the City will hold a 15-day public comment period and a public hearing to review and discuss the draft CAPER report. Below is a summary of outreach efforts and how to participate:

PUBLIC COMMENT PERIOD: All interested citizens are encouraged to participate. The draft CAPER will be available to the public to review from November 06, 2024, to November 25, 2024, and can be found on the City of Westminster website at: <https://www.westminstereconomicdevelopment.org/housing-2/cdbg/>

Written comments on the CAPER may be submitted via email cdbg@westminsterco.gov or by calling (303)-658-2485.

PUBLIC HEARING: A public hearing will be held at a regularly scheduled City Council meeting on November 25, 2024, at 7:00 PM. City Council meetings are held at City Hall in Council Chambers located at 4800 West 92nd Avenue in Westminster, Colorado.

ACCESSIBILITY: In accordance with the Americans with Disabilities Act, persons needing assistance to participate in any of these proceedings should contact the City Clerk at 303-658-2161 as soon as possible before the public hearing. If language assistance is required, residents may email cdbg@westminsterco.gov to request translation services.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

In PY 2023, there were no changes made to the original 2020-2024 Consolidated Plan goals and objectives, and the City continues to prioritize affordable housing and neighborhood revitalization. If the City finds that there is a new need or outcome that has not been identified in the original Consolidated Plan, it will document the need and take the proper steps to substantially amend its plan to address those needs. At this time, there are no changes expected to the overall goals of affordable housing and community development needs.

CDBG-CV

On March 27, 2020, the CARES Act was signed into law to address the COVID-19 pandemic, which provided CDBG-CV funds to help LMI residents prevent, prepare for and respond to the pandemic. CDBG-CV funds were allocated to the City in the total amount of \$873,207. The City used these funds to support small businesses, a food pantry to serve those sheltering, and homeless assistance for those impacted by the pandemic. As of PY 2023, all these activities have been completed successfully, and all CDBG-CV grant funds have been expended. A PR-26 CDBG-CV financial report and PR-02 List of CDBG-CV activities has been uploaded as attachment to this report as supporting documents.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?

No

CR-58 - Section 3

Identify the number of individuals assisted and the types of assistance provided

Total Labor Hours	CDBG
Total Number of Activities	0
Total Labor Hours	0
Total Section 3 Worker Hours	0
Total Targeted Section 3 Worker Hours	0

Table 8 – Total Labor Hours

Qualitative Efforts - Number of Activities by Program	CDBG
Outreach efforts to generate job applicants who are Public Housing Targeted Workers	0
Outreach efforts to generate job applicants who are Other Funding Targeted Workers.	0
Direct, on-the job training (including apprenticeships).	0
Indirect training such as arranging for, contracting for, or paying tuition for, off-site training.	0
Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching).	0
Outreach efforts to identify and secure bids from Section 3 business concerns.	0
Technical assistance to help Section 3 business concerns understand and bid on contracts.	0
Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns.	0
Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services.	0
Held one or more job fairs.	0
Provided or connected residents with supportive services that can provide direct services or referrals.	0
Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation.	0
Assisted residents with finding child care.	0
Assisted residents to apply for, or attend community college or a four year educational institution.	0
Assisted residents to apply for, or attend vocational/technical training.	0
Assisted residents to obtain financial literacy training and/or coaching.	0
Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.	0
Provided or connected residents with training on computer use or online technologies.	0
Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0
Other.	0

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

On October 29, 2020 HUD made effective the Final Rule, which set new benchmarks for Section 3 under 24 CFR 75. Section 3 helps to establish more economically sustainable communities by ensuring that employment and other economic opportunities generated by Federal assistance for development programs are directed towards very low- and low-income persons to the greatest extent possible, and in particular to those who are recipients of the Federal assistance. The Final Rule changes tracking the number of qualified new hires in Section 3 projects, to tracking the total labor hours worked.

As applicable to Westminster, the benchmark for Section 3 workers is set at 25 percent or more of the total number of labor hours worked by all workers on a Section 3 project. The benchmark for Targeted Section 3 workers is set at 5 percent or more of the total number of labor hours worked by all workers on a Section 3 project.

Section 3 Projects cover housing rehab/construction and public improvement construction activities assisted under HUD grant programs that provide housing and community development financial assistance which exceed a threshold of \$200,000. A \$100,000 project threshold applies to grants under HUD's Lead Hazard Control and Healthy Homes programs.

In PY 2023, there were no new activities that met the threshold as defined as a Section 3 project; however, the City completed two activities started in PY 2022 that meet the threshold.

PY 2022 Activity #1266 Housing Lift - East Bay Senior Housing Brothers Redevelopment was funded for \$500,000 and meets the reporting threshold. This activity included the replacement windows, sliding doors and other essential upgrades identified in a capital needs assessment to ensure the continued availability of current affordable apartments, address health, welfare and safety needs for its residents. In total, 81 units were rehabbed. There were 2,208 total labor hours performed with 1,840 hours by Section 3 workers, which meets the 25% benchmark. These workers were also Section 3 Targeted workers, which means the Targeted SW3 benchmark of 5% was also met.

PY 2022 Activity #1267 Housing Lift - Westchester Apts. - Maiker Housing Partners was funded for \$481,254.86 and also meets the reporting threshold. This activity addressed outstanding structural and safety-needs for the property, including a new roof, new exterior decks, stairs and railings, and a new fire sprinkler system. There were 1,190 total labor hours performed but no hours by Section 3 workers, which didn't meet the 25% benchmark. However, qualitative efforts taken were contracts made into smaller jobs to facilitate participation by Section 3 business concerns to help the activity meet safe harbor.