



CITY OF WESTMINSTER

# 2020-2024 Consolidated Plan

Economic Development Department  
November 2020



## **Executive Summary**

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

#### **1. Introduction**

Each year the City of Westminster (City) is eligible to receive approximately \$600,000 in federal Community Development Block Grant (CDBG) funds and a share of HOME Investment Partnership Program (HOME) consortium funds to support local housing and community development activities. As an entitlement jurisdiction designated by the U.S. Department of Housing and Urban Development (HUD), the City receives an annual direct allocation of CDBG funds from the federal government, in addition to HOME funds allocated through the Adams County Consortium.

In 2020, the City is eligible to receive \$631,806 in CDBG funds, and Adams County is eligible to receive \$1,046,683 in HOME funds. The City will be allocated approximately \$189,037 in HOME funds through the Adams County Consortium in 2020.

In addition, as part of the Coronavirus Aid, Relief, and Economic Security (CARES) Act to address local needs related to the COVID-19 pandemic, Westminster will receive a combined total of \$873,207 of CDBG-CV funds in two tranches in 2020. The allocation of these emergency funds is not addressed further in this Consolidated Plan, but rather through a separate process of substantial amendments to the 2019 Annual Action Plan.

In order to receive CDBG funds, the City must complete a Consolidated Plan every five years. The purpose of the Consolidated Plan is to identify the City's housing and community development needs, priorities, and goals and determine generally how funds will be allocated to housing and community development activities.

The City is also required to complete an Annual Action Plan every year, which specifies how the City proposes to allocate funds to projects for each program year in support of the Consolidated Plan goals. Its companion document, the Consolidated Annual Performance and Evaluation Report (CAPER), is produced on an annual basis and identifies the City's CDBG related accomplishments for the previous program year.

The City's 2020-2024 Consolidated Plan has been prepared in accordance with Sections 91.100 through 91.230 of the HUD Consolidated Plan regulations contained in the Code of Federal Regulations.



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

The City's goals for the 2020-2024 period will focus on continuing neighborhood revitalization efforts, promoting housing stability, and supporting affordability through both new construction projects and preservation of existing affordable housing stock. The City will continue to build on successful projects and programs, such as the Emergency and Essential Home Repair Program, which targets critical home improvement needs of low- and moderate-income residents. The City will also implement new projects aimed at improving safety and accessibility on streets in the Westminster Station Transit-Oriented Development (TOD) neighborhood and surrounding area. Finally, new programs will be developed to provide 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.

Annual funding priorities will be implemented through the Annual Action Plans to achieve the goals and objectives identified in the Consolidated Plan for the 2020-2024 program years. The priorities were established based on the housing and community development needs identified through Staff and City Council's review, as well as the resident survey conducted to support this Consolidated Plan. Priority needs are strongly related to the analysis in the Needs Assessment and Market Analysis sections.

## **3. Evaluation of past performance**

The City's past CDBG-funded projects have focused on community needs that continue to exist, such as aging housing stock and infrastructure. Past projects also included development of a local senior center, streetscape improvements, and supplementing efforts to cultivate an historic arts district in a low- and moderate-income neighborhood. CDBG-funded projects to address community and housing needs have generally been well received by residents and partner organizations. The activities and projects proposed for the 2020 Annual Action Plan 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 that support pedestrian safety and access, along with 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 priorities, goals, objectives, and outcomes for the 2020-2024 Consolidated Planning period. Goals and objectives were written to be broad enough to include a wide array of projects.

## **4. Summary of citizen participation process and consultation process**

Citizen participation in development of this Consolidated Plan was primarily achieved through completion of a resident survey and attendance at community meetings. Westminster residents had an opportunity to share their experiences with housing options and community resources through a

resident survey. Offered in English and Spanish and in an Americans with Disabilities Act (ADA) 508-compliant format, the survey was available online and in a postage-paid mail version. A total of 297 Westminster residents participated in the survey. Residents who commonly face disproportionate housing needs were well-represented by respondents, including:

- 101 households with children;
- 51 seniors, age 65 and older;
- 84 had a household member with a disability;
- 81 renters;
- 57 residents who were precariously housed (living in their cars, shelters, or temporarily staying with family or friends);
- 76 households with an annual income of less than \$25,000; and
- Another 48 households with an annual income of between \$25,000 and \$50,000.

The survey instrument included questions about residents' current housing and financial situations, housing and transportation challenges, knowledge of and access to community resources, and experience with housing discrimination.

In Fall 2019, staff from Westminster and the other members of the Adams County Consortium participated in three community events—Adams County Cares Day, Westminster Halloween Harvest Festival, and Thornton Harvest Festival—to collect resident input on housing and community development needs. A total of 401 residents participated in conversations and activities to identify top community needs, prioritize community development and housing investments, and pinpoint gaps in access to resources and institutional structures.

The City's consultant for this Consolidated Plan also worked with Growing Home, a local non-profit focused on basic family needs and nurturing children, and Maiker Housing Partners, the housing authority for Adams County, to facilitate a joint resident focus group with 13 participants.

Stakeholders engaged throughout the process include Maiker Housing Partners, Growing Home, Adams County Homelessness Task Force, Family Tree, Adams County Education Consortium, Adams 12 Student and Family Outreach Program, Adams County Workforce and Business Center, and Court Appointed Special Advocates (CASA.)

## **5. Summary of public comments**

Two written comments were received during the public review period, and one resident spoke to the draft Consolidated Plan during the public hearing at City Council. Both written comments are included in the Public Engagement attachment to the Consolidated Plan. The two submitted comments stated to a desire for new City investments to West 72nd Avenue; an arterial street that serves as a regional connector. The CDBG draft Consolidated Plan does not include any project investments on West 72nd Avenue and staff forwarded this input to the Transportation planning staff. Additionally, two of the



commenters also stated their opposition to the proposed affordable senior housing development at West 73rd Avenue and Lowell Boulevard. This project is programmed for 2020 CDBG funding in the Annual Action Plan and represents action on both a city strategic goal and the City's commitment to meet the HUD Housing national objective.

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

All comments and views were accepted.

## **7. Summary**

In conclusion, CDBG-funded projects for the 2020-2024 Consolidated Planning period will meet the City's priorities, goals, and objectives, and help residents enjoy safe access to a multimodal transit hub, preserve affordable housing stock, and further the ability of low- and moderate-income homeowners to make critical home repairs. Residents and community organizations will continue to be informed and invited to participate in the CDBG process to ensure projects meet the needs of the community through an updated Citizen Participation Plan that makes greater use of electronic communication methods.

## The Process

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

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

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	WESTMINSTER	Economic Development

**Table 1– Responsible Agencies**

### Narrative

The City of Westminster is the lead agency for this supplemental Consolidated Plan that covers the City's five-year planning period and one-year (2020) allocation of the Community Development Block Grant. The City is also a member of the Adams County HOME Consortium. Adams County is the lead agency and is responsible for administering the HOME program for the City of Westminster, as well as other incorporated cities and unincorporated areas of the county.

### Consolidated Plan Public Contact Information

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## **PR-10 Consultation - 91.100, 91.110, 91.200(b), 91.300(b), 91.215(l) and 91.315(l)**

### **1. Introduction**

This section reviews the stakeholder consultation process conducted for the City of Westminster's 2020-2024 Consolidated Plan.

**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)).**

The City's activities that enhance coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies are many. The City encourages and accepts funding applications from housing and health service providers through its annual Human Services Board funding process, which is funded by General Funds (not CDBG or HOME).

In 2020, the following supportive service and housing agencies received funding: A Precious Child, Almost Home, Audio Information Network of Colorado, Brothers Redevelopment, CASA of Adams and Broomfield Counties, CASA of Jefferson and Gilpin Counties, Catholic Charities and Community Services of the Archdiocese of Denver, Center for People With Disabilities, Clinica Family Health, Cold Weather Care, Colorado Homeless Families, Colorado Reach Center, Community Table, Family Tree, FISH of Westminster, Food Bank of the Rockies, Growing Home, Have a Heart Project, Hope House of Colorado, Jefferson Center for Mental Health, Kids First Health Care, Project Angel Heart, Ralston House, Rocky Mountain Multiple Sclerosis Center, Seniors' Resource Center, The Action Center, The Senior Hub, and Volunteers of America.

In addition to the funding available through the annual Human Services Board funding process, the City dedicates funds to housing and temporary shelter through partner agencies. The City supported Growing Home's federal Emergency Solutions Grant fund application to support their Canopy Transitional Housing Program that provides shelter and case management to homeless families. The City has also utilized its Private Activity Bond (PAB) allocation to support homebuyer assistance programs (low-interest mortgage and down payment assistance) to serve Westminster residents.

The Mayor, members of City Council, and Staff hold positions on many regional governmental agencies including the Denver Regional Council of Governments (DRCOG), which houses the regional's Area Agency on Aging, and the Maiker Housing Partners Board of Directors.

**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 is a member of the Metro Denver Homelessness Initiative (MDHI), a coalition working with homeless assistance agencies in the seven-county Denver metropolitan area, to coordinate the delivery of housing and services to homeless families, individuals, youth, and persons with disabilities. The goal of the initiative is to provide maximum personal independence opportunities for homeless persons, and persons at-risk of becoming homeless, through the design and implementation of a Continuum of Care model for the metropolitan Denver community. The regional representation comes in the form of appointments to the Board, as well as committee participation. The City's Homelessness Special Projects staff person serves as a voting member of the Coordinating Committee.

The City also works to ensure local non-profits are notified of federal and other grant opportunities to help them build capacity. City funding is used to partially fund detox centers with other municipalities as partners. Other regional collaboration occurs through the City's participation in One Home, the Adams County Coalition for the Homeless, Jefferson County Heading Home, Severe Weather Shelter Network, the Cold Weather Cares Advisory Board, the Adams County Homelessness Action Plan workgroup, and the Heading Home Governance Group.

Through the Human Services Board, funding is provided to the following homeless service providers and food banks: Access Housing, Almost Home, Catholic Charities of Denver, Cold Weather Cares, Community Table, Colorado Homeless Families, The Family Tree, Growing Home, Have a Heart, Jefferson Center for Mental Health, Westminster F.I.S.H., plus more than 20 other non-profits.

In 2020, the City hired a homeless navigator to meet with people experiencing homelessness where they live. The newly created position is designed to assess the needs of individuals living outdoors or at risk of homelessness and connect them with the best-fitting resources to ultimately house them.

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

Not applicable. The City does not receive the Emergency Solutions Grant (ESG). The City's Homeless Navigator is trained in administration of HMIS and will implement this tool in 2021.

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

**Table 2– Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Adams County Education Consortium
	<b>Agency/Group/Organization Type</b>	Services-Education Services-Employment Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Interviews were conducted with staff at the Adams County Education Consortium to better understand the unique challenges and needs of residents seeking employment training and support services.
2	<b>Agency/Group/Organization</b>	Adams County Workforce and Business Center
	<b>Agency/Group/Organization Type</b>	Services-Education Services-Employment Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Interviews were conducted with staff at the Adams County Workforce and Business Center to better understand the unique challenges and needs of residents seeking employment training and support services.
3	<b>Agency/Group/Organization</b>	Maiker Housing Partners (Adams County Housing Authority)
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Maiker Housing Partners was interviewed and a focus group was held with residents of Maiker properties to inform the housing needs assessment and public housing needs.

4	<b>Agency/Group/Organization</b>	Foothills Regional Housing
	<b>Agency/Group/Organization Type</b>	Housing PHA Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Foothills Regional Housing was interviewed to inform the housing needs assessment and public housing needs.
5	<b>Agency/Group/Organization</b>	FAMILY TREE, INC
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Service-Fair Housing Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Family tree was interviewed to understand the unique challenges and needs for people experiencing homelessness.
6	<b>Agency/Group/Organization</b>	Adams 12 Five Star Schools
	<b>Agency/Group/Organization Type</b>	Services-Children Services-homeless Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Adams 12 Student and Family Outreach Program was interviewed to understand the unique challenges and needs for children and families experiencing homelessness.



7	<b>Agency/Group/Organization</b>	ADAMS COUNTY
	<b>Agency/Group/Organization Type</b>	Services-homeless Other government - County Business and Civic Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Adams County Homelessness Task force was consulted to understand the system of care, barriers, and coordination in the region.
8	<b>Agency/Group/Organization</b>	GROWING HOME, INC.
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Growing Home was interviewed and a focus group was held with residents of Growing Home properties to inform the housing needs assessment and public housing needs.
9	<b>Agency/Group/Organization</b>	CASA of Adams and Broomfield County
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	CASA was interviewed to understand the needs of victims of domestic violence.
10	<b>Agency/Group/Organization</b>	ADAMS COUNTY
	<b>Agency/Group/Organization Type</b>	Agency - Emergency Management Other government - County

	<b>What section of the Plan was addressed by Consultation?</b>	Emergency Response/Resiliency
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Regular coordination between the City's emergency management coordinators and the regional and statewide organizations to prepare for rapid response during emergencies and meet essential needs during crisis events.
11	<b>Agency/Group/Organization</b>	JEFFERSON COUNTY
	<b>Agency/Group/Organization Type</b>	Agency - Emergency Management Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Emergency Response/Resiliency
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Regular coordination between the City's emergency management coordinators and the regional and statewide organizations to prepare for rapid response during emergencies and meet essential needs during crisis events.
12	<b>Agency/Group/Organization</b>	Mile High Flood Control District
	<b>Agency/Group/Organization Type</b>	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Emergency Response/Resiliency
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Working regionally and collaboratively to address matters of flood control, safety and welfare and public response to improve resilience of natural systems.
13	<b>Agency/Group/Organization</b>	Jefferson County Public Health
	<b>Agency/Group/Organization Type</b>	Services-Health Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Public Health Department

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Regular meetings to coordinate local and regional public health efforts, particularly as related to communications, locations for services, relationship to state and federal agency guidelines and directives to protect public health and welfare.
14	<b>Agency/Group/Organization</b>	Tri-County Public Health
	<b>Agency/Group/Organization Type</b>	Services-Health Health Agency Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Public Health/Resiliency
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Regular meetings to coordinate local and regional public health efforts, particularly as related to communications, locations for services, relationship to state and federal agency guidelines and directives to protect public health and welfare.
15	<b>Agency/Group/Organization</b>	State of Colorado
	<b>Agency/Group/Organization Type</b>	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources
	<b>What section of the Plan was addressed by Consultation?</b>	Resiliency Initiative
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Working regionally and collaboratively to address matters of flood control, safety and welfare and public response to improve resilience of natural systems.
16	<b>Agency/Group/Organization</b>	Tri-State Generation & Transmission
	<b>Agency/Group/Organization Type</b>	Agency - Emergency Management Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Regional Power Provider
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Emergency coordination with regional utilities to remain current on protocols and emergency management capabilities.



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

Not applicable. The City of Westminster's Consolidated Plan process provided an opportunity and invited participation and comments from all identified organizations serving low- and moderate-income Westminster residents and residents with special needs.

As detailed in the Broadband discussion in MA-60, both broadband service providers for the area, CenturyLink and Comcast, were invited to participate in evaluation of community broadband requirements during the pandemic response. Neither Comcast nor CenturyLink responded.

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Metro Denver Homeless Initiative	The City will continue to support Continuum of Care service providers including MDHI, Growing Home, Access Housing, etc. in the provision of affordable housing and services to assist persons who are homeless and/or at-risk of homelessness.
Analysis of Impediments to Fair Housing Choice (AI)	Adams County	Approach funding priorities and strategic goals with equity framework.
Hazard Mitigation Plan	City of Westminster	Evaluate the vulnerability of special populations to natural hazards and climate change.
City of Westminster CIP	City of Westminster	Projects from the CIP are included in the non-housing community development needs and goals section of this Consolidated Plan.
Business Survey	City of Westminster	Needs identified in the business survey are included in the non-housing community development needs and goals section of this Consolidated Plan.
Economic Development Department Overview	City of Westminster	Needs identified by the Economic Development Department are included in the non-housing community development needs and goals section of this Consolidated Plan
City of Westminster 2020 Strategic Plan	City of Westminster	Goals and objectives identified in the City Strategic Plan are included in the non-housing community development needs and goals section of this Consolidated Plan

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Those without homes	City of Westminster	This report analyzed the needs of people experiencing homelessness and informed regional coordination.
Shelter Programs	City of Westminster	This plan analyzed the needs of people experiencing homelessness and regional coordination.
Balanced Housing Plan	Adams County	Consolidated Plan goals and activities are aligned with this plan.
Community Needs Assessment	Adams County	Consolidated Plan goals and activities are aligned with this plan.
Housing Needs Assessment	Adams County	Identification of housing needs and opportunities.
An Assessment of Adams Efforts to Address Homeless	Adams County	This assessment analyzed the needs of people experiencing homelessness and informed regional coordination.
Housing Needs Assessment and Market Analysis	City of Westminster	Identification of housing needs and opportunities.

**Table 3– Other local / regional / federal planning efforts**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))**

The City of Westminster is part of the Adams County HOME Consortium, along with Adams County and the City of Thornton. Consortium members collaborated in the development of this Consolidated Plan in addition to ongoing administration of HUD funding. All of the Consortium members participate in the Metro Denver Homelessness Initiative (MDHI), which facilitates, integrates, and tracks cooperative community-wide and regional systems of care for people who have become homeless, but seek to live in a stable home and maximize self-sufficiency. Inter-jurisdictional collaboration in Adams County also occurs through the Adams County Coalition for the Homeless, the Cold Weather Care Advisory Board, the Adams County Homeless Action Plan Steering Committee, Maiker Housing Partners, and the Adams County Homelessness Task Force.

City staff also regularly participate in the "CDBG Users Group," an association of the HUD Region 8 CDBG grantees throughout the Colorado Front Range, in order to consult and coordinate on issues pertaining to the CDBG program, including the Consolidated Plan. Finally, Westminster is an active participant in the Metro Mayors Caucus, which is a voluntary and collaborative membership organization for the mayors in the Denver region. The Metro Mayors Caucus is active in housing issues, especially the issue of affordable housing.

## **Narrative**

Staff from Economic Development (ED); Parks, Recreation and Libraries (PRL); and the Police Department (PD); as well as other City departments, participated in regional planning and information sharing across the Denver metro area and the state that informed this effort. During the writing of this Consolidated Plan, Staff engaged in efforts with both Adams and Jefferson Counties to coordinate emergency resources and programming that was rapidly deployed with CARES Act funds. Although this Consolidated Plan does not include the programming of CDBG-CV funds resulting from the CARES Act, there is recognition of the substantial community and financial impacts resulting from the pandemic and the increased level of community need that will require a coordinated use of funding mechanisms. Additionally, Staff works closely with the HUD Region VIII Staff and the CDBG Users Group to identify emerging trends and issues and share best-practice level guidance. Staff coordinated the development of the 2020-2024 Consolidated Plan and the research to inform the Plan with Adams County and utilized a local policy research consultant who performed the data gathering and investigation for both jurisdictions.



## **PR-15 Citizen Participation - 91.105, 91.115, 91.200(c) and 91.300(c)**

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

Citizen participation in development of this Consolidated Plan was primarily achieved through completion of a resident survey and attendance at community meetings.

Westminster residents had an opportunity to share their experiences with housing options and community resources through a resident survey. Offered in English and Spanish and in an ADA accessible 508-compliant format, the survey was available online and in a postage-paid mail version. A total of 297 Westminster residents participated in the survey. Residents who commonly face disproportionate housing needs were well-represented by respondents, including:

- 101 households with children;
- 51 seniors, age 65 and older;
- 84 had a household member with a disability;
- 81 renters;
- 57 residents who were precariously housed (living in their cars, shelters, or temporarily staying with family or friends);
- 76 households with an annual income of less than \$25,000; and
- Another 48 households with an annual income of between \$25,000 and \$50,000.

The survey instrument included questions about residents' current housing and financial situation, housing and transportation challenges, knowledge of and access to community resources, and experience with housing discrimination.

In Fall 2019, staff from Westminster and the other members of the Adams County Consortium participated in three community events—Adams County Cares Day, Westminster Halloween Harvest Festival, and Thornton Harvest Festival—to collect resident input on housing and community development needs. A total of 401 residents participated in conversations and activities to identify top community needs, prioritize community development and housing investments, and pinpoint gaps in access to resources and institutional structures.

The City's consultant preparing this Consolidated Plan also worked with Growing Home and Maiker Housing Partners to facilitate a joint resident focus group with 13 participants.

Stakeholders engaged throughout the process include Maiker Housing Partners, Growing Home, Adams County Homelessness Task Force, Family Tree, Adams County Education Consortium, Adams 12 Student and Family Outreach Program, Adams County Workforce and Business Center, and CASA.

A 30-day comment period on the draft Consolidated Plan was held from October 13 through November 12, 2020, and a Public Hearing was held November 23, 2020 following the comment period.

Please see the appendix for a thorough discussion of the findings from the citizen participation process.

### 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 (if applicable)
1	Public Meeting	Non-targeted/broad community  All residents, particularly those with housing and human services needs	260 Westminster Halloween Harvest Festival; 86 Thornton Harvest Festival; 55 Adams County Cares	Wide range of comments covering housing and community development needs.	All comments or views received were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Citizen Survey for Consolidated Plan and Community Services	Non-targeted/broad community  All residents, particularly those with housing and human services needs	1,708 Adams County residents; 525 Thornton; 535 unincorporated Adams; 297 Westminster; 252 Brighton; 99 Northglenn	Feedback related to housing and community development needs as well as human services needs and challenges.	All comments or views received were accepted.	
3	Citizen Survey for Consolidated Plan and Community Services	Residents of Public and Assisted Housing	13 residents of Maiker Housing Partner and Growing Home rental properties shared their experience with housing in Adams County; residents represented Spanish speakers, residents with a disability, and other minority groups	Feedback related to housing needs and challenges, community access to opportunity, accessibility, and discrimination.	All comments or views received were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	Public Hearing	Non-targeted/broad community  All residents, and individuals engaged in community development and human services	The 2020-2024 Draft Consolidated Plan was presented to the City Council as an advertised pre-meeting on Monday, October 12, 2020. This meeting overviewed the proposed priorities and investments contained in the plan and advertised the 30-day review period. A copy of the presentation is included in the Citizen Participation attachment to this document.	Comments received during the 30-day review are contained in the Citizen Participation attachment to this document.	All comment or views received were accepted.	

**Table 4– Citizen Participation Outreach**

# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

The Needs Assessment of the Consolidated Plan, in conjunction with information gathered through consultations and the citizen participation process, provides a picture of the City's and Adams County Consortium's needs related to affordable housing, special needs housing, community development, and homelessness.

This section summarizes the primary housing and service needs in the City, followed by additional information on non-housing community development needs (section NA-50), as required by HUD. Data and information for this section draws on market data, disproportionate needs data from HUD ("CHAS" data), stakeholder consultation, and resident input. An analysis of Consortium-wide housing needs, public housing, homeless needs, and non-homeless special needs may be found in the Adams County Consolidated Plan.

**Housing needs.** Cost burden and severe cost burden are the most common housing problems in the City. Top housing needs citywide include:

- **Cost burden.** In 2018, an estimated 7,269 owner households and 9,007 renter households were cost burdened in Westminster. Renter households are more likely to be cost burdened with 51 percent burdened, compared to 26 percent of owner households.
- **Affordable rental housing.** An analysis of 2017 Census data on rental costs and needs found an estimated shortage of 2,705 rental units for renters with income of less than \$25,000 (units priced at less than \$625 per month). This shortage has decreased since 2014 when the estimated gap was 3,429 units. During this time, the number of units affordable to these extremely low-income renters (units priced at less than \$625 per month) decreased by 429 units, while the number of low-income renter households in Westminster declined by 1,153. As such, the decline in the unit shortage is largely due to fewer extremely lower income renters with needs. This occurs because they left the City or experienced income increases. It is likely, with the recent economic disruption caused by COVID-19, that needs are now closer to where they were in 2014, and potentially greater.
- **Ownership opportunities for low- and moderate-income residents who would like to buy homes.** Increases in owner household income did not keep up with increases in home prices. Buyers now need to be higher income to enter the market. From 2015 to 2018, median home value increased by \$96,100 (35%) from \$275,300 to \$371,400. During the same time, median household income for owners increased by nearly \$1,500 (1.7%) from \$87,578 to \$89,041.

### Priority Needs

**Priority needs.** The resident survey, as well as resident and stakeholder focus group discussions, focused on identifying priority needs in the City. Based on the resident survey conducted for this Consolidated Plan, the top housing challenges experienced by the greatest proportion of Westminster survey respondents overall include:

- About one in four (23%) respondents say they “struggle to pay my rent/mortgage” and 64 percent of renters worry about their rent going up to an amount they can’t afford.
- One in three (35%) Hispanic respondents, respondents with children (33%), and respondents whose household includes a member with a disability (33%) struggle to pay their rent/mortgage. Seniors and higher income households are least likely to report struggling to pay their monthly rent/mortgage.
- Half of renters want to buy a home but can’t afford the down payment (51%), and two in five (44%) want to buy, but have too much debt to qualify for a mortgage.
- Overall, 15 percent of Westminster respondents worry about poor/low school quality in their neighborhood, similar to Adams County respondents (13%).
- Renters (19%) and households with incomes of \$25,000 up to \$50,000 (23%) are more likely to be concerned by high crime in their neighborhood than the typical Westminster respondent (13%).

#### **Non-homeless special needs.**

**Non-Homeless special needs.** Non-homeless special needs populations include households containing persons with a disability, elderly households, large families, female headed households with children, limited English proficient (LEP) households, and those at risk of homelessness.

- **Disability.** An estimated 12,747 residents in Westminster (11% of the total population) have a disability (mental, physical, and/or developmental). According to CHAS data provided by HUD, 46 percent of households—approximately 4,222—containing at least one disabled resident have an unmet housing need.
- **Elderly households.** Households with at least one person over the age of 62 make up 24 percent of all households in the City—approximately 11,000. Of these households, 34 percent or 3,735 have a housing need.
- **Large families.** In Westminster there are an estimated 3,704 large family households—defined as families with five or more members. Forty-one percent of large family households—approximately 1,535—have a housing need according to CHAS data provided by HUD.
- **Victims of domestic violence.** Based on national prevalence rates there are an estimated 4,778 total households that experience domestic violence annually in the City of Westminster. Approximately two percent of victims or 113 households require housing assistance annually in Westminster.
- **Limited English proficient households.** There are an estimated 1,293 LEP households in Westminster. Eleven percent or 145 households have a housing need.

- **At risk of homelessness.** Households that are extremely cost burdened (paying more than 50% of income on housing) are considered at risk of homelessness. In Westminster, an estimated nearly 5,000 households (12 percent of households) are severely cost burdened and at risk of homelessness. The number of households at risk of homelessness has increased with the fallout of the COVID-19 pandemic. However, current data does not reflect the scale of pandemic induced need.

### **Households with disproportionately greater needs, public housing, and people experiencing homeless**

**Households with disproportionately greater needs.** In Westminster, Black or African American (70 total households) and Asian (170 total households) households are more likely to experience housing problems than non-Hispanic White households. Additionally, single family households and households with multiple, unrelated families experience overcrowding disproportionately.

**Public housing.** Private housing market factors combined with a lack of federal funding for public housing create extra challenges for housing authorities. As a high performing public housing authority, Maiker Housing Partners works closely with the region to address affordability needs for residents they serve. Maiker Housing Partners is actively pursuing innovative approaches to financing and acquiring assets to develop and maintain affordable housing throughout the county. Maiker is actively pursuing land banking and acquisition as well as implementing progressive policies around eviction prevention assistance and criminal screening.

**People experiencing homelessness.** The 2020 Point in Time count (PIT) identified a total of 476 individuals in Adams County and 441 individuals in Jefferson County experiencing homelessness. Among the population experiencing homelessness in Adams County, 170 were chronically homeless, 276 were living in emergency shelters, 160 were unsheltered, and 40 were housed in transitional housing. Among the population experiencing homelessness in Jefferson County, 155 were chronically homeless, 136 were living in emergency shelters, 159 were unsheltered, and 149 were housed in transitional housing.

## NA-50 Non-Housing Community Development Needs - 91.415, 91.215 (f)

### Describe the jurisdiction's need for Public Facilities:

Non-housing community development needs including public facilities, public improvements, and public services are discussed in the City of Westminster 2017 to 2021 Capital Improvement Plan (CIP) and the City of Westminster 2019 Strategic Plan. These community resources, paired with input from stakeholder interviews and the community survey, inform the non-housing community development needs discussed in this section.

### Citywide Public Facility Needs

Generally, Westminster public facilities are in good repair, but require routine maintenance and replacement. In 2019, staff proposed a budget amendment to implement a CIP that prioritizes infrastructure improvements. The 2020 Strategic Plan identifies the following action items related to the need for public facilities:

**ACTION XI.28:** Assess the following major infrastructure categories and develop funding/implementation strategies to protect and maintain the City's investments: municipal court (including options for a new courthouse and potential location), municipal government buildings, utilities, recreation, golf, streets, parks, open space, police, fire, and technology.

*Spring 2020 Strategic Plan Update (3/2019 to 2/2020):*

- *"Staff continue to assess major infrastructure categories and develop funding and implementation strategies to protect and maintain the City's investments. In the third quarter of 2019, Staff proposed a balanced budget amendment to City Council, including a capital improvement program that emphasizes infrastructure needs."*
- *"Staff kicked off the 2020 Long Term Planning Cycle for 2023/2024 in February. Long-term planning involves a thorough review of the Utilities Asset Database where assets of value greater than \$20,000 are listed with date of install, anticipated useful life, cost, and rating of criticality, vulnerability and risk. With a focus on taking care of what the City owns, Staff establish which assets are the highest priorities to add to the minimally responsible capital improvement projects (CIP) for the next budget cycle. This effort involves thousands of Staff hours including data base work, interviews, site visits, and workshops. In a transparent manner, Staff work together to determine the minimally responsible CIP."*
- *"Staff have been working to identify the condition of the City's streets. The pavement management system currently shows the average Pavement Quality Index (PQI) for all City roadways is a 65.6 on a scale ranging from 0 to 100. This rating places Westminster's roadways into the Fair category. In addition to establishing the current pavement condition, the pavement management application is capable of predicting future street condition based on the level of funding dedicated towards maintenance and rehabilitation. The average investment over the*



*last 5 years is \$4.5 million per year. Using this input for future years, the pavement management application forecasts the City's overall PQI to be 51.7 in 2024. In order to maintain current PQI or to improve the current PQI value, additional funding is needed to increase the amount of pavement maintained and rehabilitated each year. Staff will present this information to City Council at a future Study Session"*

- *"Staff issued approximately \$102,000,000 in debt for infrastructure for utilities. The actual issuance will be broken down in smaller pieces to take advantage of the Colorado Water Resources and Power Development Authority's ability to issue debt at a subsidized interest rate. The first piece issued were \$38 million in revenue bonds issued at just under 2.7% interest in early December."*

### **How were these needs determined?**

Please see above.

### **Westminster 2017-2021 CIP**

"The following projects are direct excerpts from the City of Westminster 2017 to 2021 CIP related to public facility improvements:

#### **Library Repair and Maintenance**

*"This ongoing project provides funding for the repair and maintenance of the structure and furnishings at the Irving Street and College Hill Libraries. Upcoming projects include furniture replacements at both locations, as well as storage solutions for programming equipment and materials. This project also sets aside money for major capital repairs, maintenance, and replacements at the College Hill and Irving Street Libraries."*

#### **Recreation Facilities Major Maintenance (Building Operations & Maintenance)**

*"This ongoing project provides funding for various projects relating to the typical maintenance of the recreation facilities. Projects include more typical maintenance projects related to the age and consistent use of the facilities. The budget is timed to take advantage of expected facility closures and minimize costs of the projects. Key projects for 2017 include the west boiler room configuration and Siemens controls addition at the Swim and Fitness Center, and the replacement of failed glass panes and expansion joints at the City Park Recreation Center. Key projects for 2018 include the replacement of the building automation system at the Irving Street Library, and the replacement of the domestic hot water system and fire sprinkler heads at the City Park Recreation Center."*

## **Describe the jurisdiction's need for Public Improvements:**

The five-year CIP for the City of Westminster, adopted in 2017, includes the adopted budget for 2017 and 2018, as well as the recommended budget for 2019 through 2021. Improvements based on the CIP include water improvements (45% of the total CIP budget), general non-park improvements (20%), park improvements (17%), wastewater improvements (16%), and stormwater improvements (3%).

While the City has prioritized investments in Historic Westminster over the past five years, public improvements are still needed in surrounding areas as well. Transportation infrastructure is aging or inadequate in older parts of the City. In particular, the neighborhood access to the multimodal hub of Westminster Station is limited by aging and incomplete infrastructure for pedestrians. There is a need to improve safety for pedestrians with enhanced lighting. Most of the sidewalks are of insufficient width for pedestrians and have cracking and uneven sections, creating hazardous conditions, particularly for seniors, children, and those with mobility limitations. There are also gaps in the neighborhood network where no sidewalks currently exist. These problems can impede the City's ability to promote new development and investment, as well as to maintain a high level of health and safety.

The following projects are direct excerpts from the City of Westminster 2017 to 2021 CIP related to public improvement needs:

### **New Streetlight Program**

*"This ongoing project provides funding for the installation of individual street lights in warranted locations usually as requested by residents or neighborhoods. New street lights are installed throughout the City, primarily in Historic Westminster."*

### **Historic Westminster Revitalization**

*"Historic Westminster reinvestment remains a priority as identified in the Strategic Plan. Funds will assist in implementing established goals and objectives through our planning efforts. Examples of some potential investments include: potential key property acquisition, infrastructure improvements, conceptual development plans, enhancements to 73rd Avenue, and grant matching funds for outside funding assistance."*

### **City-Wide Open Cut Sewer Repairs**

*"This ongoing project is for the replacement of high priority sections of sewer collection system piping that have reached the end of their economic life and are problematic due to frequent clogging, grease build up, backups or hydraulic restrictions. Repairs are also prioritized as determined through the City's inspection program or coordination with other City sewer, street rehabilitation or development projects. Open cut replacement of sanitary sewers is used where less invasive trenchless technology methods are not possible. The focus of this project is repairs on approximately 2,100 linear feet of existing pipe in residential areas throughout southeast Westminster. The project also includes approximately 300 feet of new sewer along La Place Court to transition houses currently using septic tanks to City sewer service."*

### **Sheridan Boulevard Main Repair - South of US36**

*“The first phase of the Sheridan Boulevard waterline R&R focuses on the area from roughly 88th Avenue South to 70th Avenue. Timing is especially important for coordination with other City utility work in this area, including: 1) water and sewer R&R projects on 88th Avenue for the new downtown; 2) water main replacement as part of the Pressure Zone 3 Expansion Project; and 3) sewer replacement for the Little Dry Creek Interceptor Sewer R&R Project. Future phases will extend north to 120th Ave.”*

### **How were these needs determined?**

Please see above.

### **Describe the jurisdiction’s need for Public Services:**

The City of Westminster 2019 Strategic Plan identifies the following action items related to the need for public services:

**ACTION XII.29:** Continue public and community safety efforts and initiatives, including focus on public safety employees’ health and safety as well as enhanced community engagement.

- *Spring 2020 Strategic Plan Update (9/2019 to 2/2020):*
- *“Staff supported employee appeal to Colorado Firefighter (FF) Cancer Trust to request coverage by the Trust for breast cancer. Five FF cancer claims have been reported in the past 4 months. All have applied to the FF Cancer Trust for applicable coverage.”*
- *“Staff received two Automated License Plate Readers (ALPRs) through two separate grant sources. ALPRs are a tool to reduce crime and provide a safe community. Staff was recognized with the 2019 Colorado Association of Sex Crimes Investigators “Gator Award”. This award represents excellence, integrity, leadership, loyalty, respect and selfless service in the field of sexual investigation. Staff also coordinated several activities to benefit citizens such as the “Battle of the Badges” competition to raise money for local families, Drug Take Back Day, childhood cancer fundraiser, and the Santa Cops program to provide gifts and turkey dinners to families in need during the holidays. Staff was also selected to be a national School Resource Officer (SRO) Instructor through the National Association of School Resource Officers. Staff also advised on labor negotiations for the new contract with fire department employees.”*

**ACTION XII.30:** Continue to implement strategic components of the Police Department’s International Associations of Chiefs of Police (IACP) Operations & Management Study (January 2018) and the Fire Department’s Assessment Results from the Center for Public Safety Excellence (CPSE) Accreditation Process (Fall 2019).

*Spring 2020 Strategic Plan Update (9/2019 to 2/2020):*

- *“The International Association of Chiefs of Police (IACP) study provided a broad and comprehensive evaluation of police services, including insights into departmental leadership, community policing strategies, systems, policies, structure, communication and staffing. Based on this assessment, Staff developed an ongoing planning effort to implement identified strategies. While many of the recommendations were completed in 2018, Staff continue to review the in-progress, under consideration, and delayed recommendations from time-to-time to ensure future-forward progress in modern policing.”*
- *“Fire Department accreditation was completed August 2019.”*

**How were these needs determined?**

Please see above.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

This section continues the discussion of housing needs in the above Needs Assessment (NA) section with a more specific focus on housing costs and condition.

**Rental market.** Renter demographics in the City have shifted since 2015. Westminster has more renters earning more than \$100,000 and fewer poverty level renters earning less than \$25,000. The tight regional rental market has increased demand for affordable rentals in every city, including Westminster.

The average rent in the third quarter of 2019 in Westminster was \$1,443, which falls between the average rents in Adams County (\$1,423) and Jefferson County (\$1,516). In 2017, there were 429 fewer rental units affordable to low income households than in 2015 (\$500 to \$625 per month rents). However, the total number of renters who are paying more than they can afford for housing decreased slightly from 2015 to 2018 due to low income renters being priced out of the market.

**Rental gap.** The rental gap analysis displayed in the table below compares the number of renter households in Westminster, their income levels, the maximum monthly housing payment they could afford, and the number of units in the market that were affordable to them. The “Rental Gap” columns show the difference between the number of renter households and the number of rental units affordable to them. Negative numbers (in parentheses) indicate a shortage of units at the specific income level; positive units indicate an excess of units.

In 2017, there was an estimated shortage of 2,705 units for low-income renters earning less than \$25,000. This shortage has decreased since 2014 when the estimated gap was 3,429 units. During this time, the number of units affordable to low-income renters (earning less than \$25,000) decreased by 429 units (units priced at less than \$625 per month) while the number of low-income renter households in Westminster decreased by 1,153 households. Although the shortage of rental units decreased from 2014 to 2017, the decrease is due to low-income renters being priced out of the market.

Overall, the City had 1,255 fewer affordable rental units in the housing inventory in 2017 compared to 2014. These units were not physically demolished, but rather saw rent increases that push them beyond the range of affordability for low - and moderate-income households. The majority of units lost were priced between \$875 and \$1,875 per month. During the same time, the number of units priced over \$2,500 per month increased by 1,883 units.

**Ownership market.** Like most housing markets across the country, Westminster experienced substantial increases in home values between 2000 and 2018. Since the Great Recession, home values in Westminster have recovered. Median home value increased 64 percent from \$227,000 in 2011 (post-

recession) to \$371,400 in 2018. Since the last market study in 2015, the median home value increased by \$96,100 (35%). Rising prices in the ownership market have the most impact on renters who would like to buy as ownership is pushed further out of reach.

From Q1 2018 to Q1 2019, the majority (59%) of sales in Westminster were priced between \$300,000 and \$500,000, which are affordable to households earning between \$75,000 and \$125,000. Homes priced less than \$300,000 are affordable to households earning less than \$75,000. Most homes in this price range are attached (80%), which is a steep increase from 2016 when 47 percent of homes priced less than \$300,000 were attached. Attached homes (townhomes, duplexes, or paired homes) make up a much larger proportion of affordable sales (80%) than all sales (26%).

Income Range	Maximum Affordable Gross Rent	2014				2017				2014-2017 Change	
		Renter Households	Rental Units	Gap	Cummulative Gap	Renter Households	Rental Units	Gap	Cummulative Gap	Renter Households	Rental Units
Less than \$5,000	\$125	303	0	(303)	(303)	106	7	(99)	(99)	(197)	7
\$5,000 to \$9,999	\$250	1,105	234	(871)	(1,174)	987	156	(831)	(929)	(118)	(78)
\$10,000 to \$14,999	\$375	839	291	(548)	(1,722)	556	143	(413)	(1,342)	(283)	(148)
\$15,000 to \$19,999	\$500	898	0	(898)	(2,620)	772	84	(688)	(2,030)	(126)	84
\$20,000 to \$24,999	\$625	1,453	644	(809)	(3,429)	1,024	350	(674)	(2,705)	(429)	(294)
\$25,000 to \$34,999	\$875	1,687	3,245	1,558	(1,871)	1,818	1,854	36	(2,669)	131	(1,391)
\$35,000 to \$49,999	\$1,250	2,399	5,730	3,331	1,460	4,162	4,940	778	(1,891)	1,763	(790)
\$50,000 to \$74,999	\$1,875	3,111	6,650	3,539	4,999	3,736	6,122	2,386	495	625	(528)
\$75,000 to \$99,999	\$2,500	1,997	0			1,937				(60)	1,883
\$100,000 to \$149,999			0	(4,354)	645	1,145	1,883	(1,675)	(1,180)	(1,212)	0
\$150,000 or more	\$3,750	2,357	0			476				476	0
<b>Total/ Low income Gap (&lt;\$25,000/year)</b>	<b>n/a</b>	<b>16,149</b>	<b>16,794</b>	<b>(3,429)</b>	<b>n/a</b>	<b>16,719</b>	<b>15,539</b>	<b>(2,705)</b>	<b>n/a</b>	<b>570</b>	<b>(1,255)</b>

## Rent Market Mismatch

## MA-45 Non-Housing Community Development Assets - 91.410, 91.210(f)

### Introduction

This section provides an overview of the economic and community development landscape of the City including business activity, labor force statistics, and the economy in general.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	835	26	2	0	-2
Arts, Entertainment, Accommodations	6,518	7,025	14	17	3
Construction	3,677	1,481	8	4	-4
Education and Health Care Services	7,031	11,305	15	27	12
Finance, Insurance, and Real Estate	3,424	3,110	7	7	0
Information	1,787	1,921	4	5	1
Manufacturing	4,784	1,607	10	4	-6
Other Services	1,655	1,008	3	2	-1
Professional, Scientific, Management Services	6,608	5,495	14	13	-1
Public Administration	0	0	0	0	0
Retail Trade	6,267	6,952	13	17	4
Transportation and Warehousing	1,858	169	4	0	-4
Wholesale Trade	3,175	1,597	7	4	-3
Total	47,619	41,696	--	--	--

**Table 5 - Business Activity**

Alternate Data Source Name:  
2017 ACS 1-year Estimates

## Labor Force

Total Population in the Civilian Labor Force	64,218
Civilian Employed Population 16 years and over	61,867
Unemployment Rate	3.70
Unemployment Rate for Ages 16-24	8.37
Unemployment Rate for Ages 25-65	2.80

**Table 6 - Labor Force**

**Alternate Data Source Name:**  
2017 ACS 1-year Estimates

Occupations by Sector	Number of People
Management, business and financial	10,255
Farming, fisheries and forestry occupations	0
Service	11,286
Sales and office	17,049
Construction, extraction, maintenance and repair	3,222
Production, transportation and material moving	6,524

**Table 7 – Occupations by Sector**

**Alternate Data Source Name:**  
2017 ACS 1-year Estimates



## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	32,849	57%
30-59 Minutes	21,663	37%
60 or More Minutes	3,432	6%
<b>Total</b>	<b>57,944</b>	<b>100%</b>

Table 8 - Travel Time

Alternate Data Source Name:  
2017 ACS 1-year Estimates

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	3,489	46	1,422
High school graduate (includes equivalency)	11,075	310	2,637
Some college or Associate's degree	15,985	524	3,931
Bachelor's degree or higher	20,374	619	2,164

Table 9 - Educational Attainment by Employment Status

Alternate Data Source Name:  
2017 ACS 1-year Estimates

### Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	0	52	278	1,195	490
9th to 12th grade, no diploma	1,801	639	1,517	1,276	605
High school graduate, GED, or alternative	3,401	3,650	4,063	6,309	4,537

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Some college, no degree	2,925	4,547	3,157	6,380	4,259
Associate's degree	364	1,878	1,502	2,976	776
Bachelor's degree	1,850	6,489	4,311	5,954	2,931
Graduate or professional degree	92	2,101	1,462	2,840	2,647

**Table 10 - Educational Attainment by Age**

**Alternate Data Source Name:**

2017 ACS 1-year Estimates

### Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	20,728
High school graduate (includes equivalency)	37,482
Some college or Associate's degree	40,222
Bachelor's degree	46,225
Graduate or professional degree	59,663

**Table 11 – Median Earnings in the Past 12 Months**

**Alternate Data Source Name:**

2017 ACS 1-year Estimates

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

The business activity table compares where City of Westminster residents work with jobs available in the City. The top employment industries with the greatest share of jobs in the City include education and health care services (25% of jobs); arts, entertainment, and accommodations (16% of jobs); retail trade (15% of jobs); and professional, scientific and management services (12% of jobs).

Generally, the industries of workers and jobs are well aligned in Westminster. The top employment industries with the greatest share of workers include education and health services (14% of workers); arts, entertainment, and accommodations (13% of workers); professional, scientific, and management services (13% of workers); and retail trade (12% of workers).

The Jobs less Workers column of the Business Activity table suggests that Westminster has somewhat fewer workers than jobs in Education and Health Care Services (11 percentage point difference). Conversely, Westminster has somewhat more workers than jobs in the manufacturing category (6 percentage point difference) and construction (4 percentage point difference). In all other industries, the difference in workers and jobs is 3 percentage points or less.

### **Describe the workforce and infrastructure needs of the business community:**

Westminster regularly communicates with its local employers about current economic conditions, trends in business operations, and needs. The City conducts a survey of businesses every two years. However, the economic impacts of the COVID-19 pandemic are not captured in the most recent data available at the time of this report. Workforce and infrastructure needs of the business community in the City are expected to become more acute with the economic fallout of the pandemic.

### **Business Survey (2020)**

In March 2020, the City contracted with Left Brain Concepts, Inc. (LBC) to conduct a business survey written by City staff. A survey was sent to every business registered with the City, and 246 surveys were ultimately analyzed (representing 10% of businesses at the time the survey was administered). Respondents represent a wide range of industries. The top four industries surveyed include professional services (20%), retail (12%), health care (12%), and personal services (10%).

***Delivery of services.*** Respondents were asked to rate the delivery of services from a list of 13 support services such as roads, utilities, police and fire protection, and economic development provided by the City and other entities. Business owners rated delivery of services—combining responses of adequate and excellent—as follows:

- Fire protection – 99%
- Water quality – 95%

- Law enforcement – 95%
- Parks, trails and open space – 93%
- Wastewater services – 93%
- Stormwater services – 92%
- Business services – 88%
- On-street parking options – 86%
- Pedestrian & bicycle infrastructure – 85%
- Building permitting / inspections – 79%
- Street maintenance – 79%
- Value of water and sewer rates – 76%
- Land-use / planning – 75%

**Services to foster growth.** Businesses were asked to rate the priority of eight “Services Westminster is presently providing or could provide to foster growth in the business community.” The top-rated services were as follows.

- Promote Westminster as a place to visit and shop – 52%
- Serve as an advocate for local businesses – 48%
- Offer financial incentives to new and expanding companies – 47%
- Provide business retention services – 46%
- Attract businesses to Westminster – 44%
- Provide assistance with local government regulations & procedures – 43%
- Provide incubator space for start-up businesses – 29%
- Provide training to existing businesses – 29%

**Business needs.** Respondents were asked on an open-ended basis “What, if anything, could the Westminster Economic Development Department do better to support the business community in Westminster?” The following themes emerged:

- Promote small businesses and/or provide training – 39%
- Lower taxes and reduce ordinances – 35%

- Tend to roads including maintenance, traffic control, and shortening road closures – 23%
- Respond faster to inquiries – 10%
- Address the homeless population including with an increased police presence – 12%

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

A major factor impacting job and business growth opportunities over the five-year period covered by this Consolidated Plan will be the response to and recovery from the COVID-19 pandemic, which is still unfolding as of the drafting of this Plan. To-date, the City's response to the economic emergency created by the pandemic has utilized resources that are not covered under this Consolidated Plan, namely federal CARES Act and CDBG-CV funds. The City has used these resources to launch grant programs offering short term financial assistance to local small businesses, create and preserve employment opportunities for low-moderate income residents, and assist businesses in adapting their physical spaces in order to continue operating safely. While the City does not intend to use CDBG funds for direct economic development activities during this Consolidated Plan period, other CDBG activities to improve public facilities and create or preserve affordable housing stock will help to mitigate the economic effects of the pandemic.

With the arrival of commuter rail in Westminster, the Westminster Station Transit-Oriented Development (TOD) Area is at a pivotal point for redevelopment and investment. The City has played a key role in facilitating the redevelopment of the area, as well as recruiting development and investments. Additionally, Downtown Westminster, Historic Westminster, and Westminster Station TOD all fall within designated federal Opportunity Zones. This designation provides an opportunity to attract greater private capital investment in the areas. Furthermore, the City's Comprehensive Plan includes five focus areas where greater development density is planned to occur. These focus areas include: Westminster Station TOD, Downtown Westminster, Church Ranch/Promenade, Orchard/North I-25, and Brookhill. These areas are prioritized in terms of infrastructure investment and are designed to include a mix of uses including housing, employment, and services.

The City of Westminster 2019 Strategic Plan identifies the following action items related to development activity:

**ACTION X.21:** Complete a Framework Plan for Historic Westminster to complement efforts for the Specific Plans for Westminster Station area transit-oriented development (TOD) and Harris Park.

**ACTION X.24:** Recruit developers and business investors to Downtown Westminster consistent with the vision for the area.

**ACTION X.25:** Recruit developers and business investors to Westminster Station consistent with the vision for the area.

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

The City of Westminster is home to a well-educated workforce, excellent public schools, and five colleges including Front Range Community College, whose main campus is located in Westminster. Many of the jobs located in Westminster require a level of education beyond a high school diploma. For the population 25 years and older, more than one in three have a bachelor's degree or higher (37%), one in three have some college or an associate's degree (33%), nearly one in four have a high school diploma or GED (22%), and only eight percent did not graduate high school. Those without a college degree are likely limited to employment to low skill and low paying positions.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

Westminster residents have access to several local workforce training resources. The Colorado FIRST Customized Training Program is a statewide job-training program that provides funding to companies relocating or expanding in Colorado. The Center for Workforce Development at Front Range Community College in Westminster offers and facilitates business-specific training for all business needs, whether it is a high-tech process or administrative training. Also, the Adams County Workforce and Business Center and the Jefferson County Workforce Center offer assistance to businesses and individuals to help fill job vacancies. The Adams County Center for Career and Community Enrichment provides employment classes, workshops, and numerous other services such as resume writing and job interview skills training for low-income residents.

These programs exemplify the programs and resources designed to address the needs of both Westminster job seekers and employers.

In March of 2020, the City contracted with Left Brain Concepts, Inc. (LBC) to conduct a business survey written by City staff. A survey was sent to every business registered with the City and 246 surveys were ultimately analyzed (representing 10% of businesses at the time the survey was administered). Respondents represent a wide range of industries. The top four industries surveyed include professional services (20%), retail (12%), health care (12%), and personal services (10%).

Businesses were asked to rate their interest in areas that the Westminster Economic Development Department could facilitate training for local businesses at low or no cost. Thirty percent of businesses indicated they were not interested in training at this time. For the businesses that were interested in training, the top training areas were in help promoting their businesses (43%), increasing revenues (36%), accounting (26%), human resources (25%), loans (22%), succession planning and emergency management (17%), and workforce issues (16%).

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

No

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

The City of Westminster does not participate in a Comprehensive Economic Development Strategy through the U.S. Economic Development Administration. However, the City is active in several regional organizations which work collaboratively to advance the business and economic interests of the Denver Metropolitan Area. The City partners with organizations such as Adams County Economic Development, Jefferson County Economic Development, Metro Denver Economic Development Corporation, area chambers of commerce, and many other regionally-based organizations to create and maintain a vital and sustainable economy.

In addition to regional collaboration, the Economic Development Department works to attract new businesses to the area and retain and expand existing businesses through outreach, financial tools, and relationship building. The department provides advocacy and technical assistance to small businesses and hosts the Legacy Awards to recognize small businesses who have been in operation in Westminster for at least 25 years. The department also administers small business capital improvement grants that leverage private investment and awards small business scholarships.

Most significantly, in response to the COVID-19 pandemic, the department has overseen the creation and implementation of three major business assistance grant programs with the use of CARES Act funds. Combined, these grants will infuse over \$2.3 million before the end of 2020. In addition, the City has directed the first tranche of CDBG-CV funds (over \$371 thousand) to small business assistance grants that target the retention of jobs for low- and moderate-income individuals. It is anticipated that the City will continue to work with local and regional partners, utilizing state and federal resources, to support the business community and the associated changing needs of the workforce.

## Discussion

Please see above.

### Spring 2019 City of Westminster Strategic Plan

- *“Staff is working with a consultant to bring forward a community vision plan for Harris Park. As a part of that process, several community meetings were held in Historic Westminster and the Harris Park Neighborhood in 2019 to capture the community’s vision for revitalization as well as how to create stronger connections to the Westminster Station and Transit-Oriented Development (TOD) area. A community vision plan is a foundational step for future plans for Historic Westminster that address land use and design standards. A draft of the final document is currently undergoing internal review and will serve as the framework to implement revitalization strategies and will be presented for public review in the coming months. Additionally, Historic Westminster and Harris Park have been identified in the Comprehensive Plan Update as an area that will be the focus of additional planning work and related efforts to update the Development Code and Design Standards. Staff continues to build key relationships with businesses, developers, and residents to support the redevelopment of the Harris Park Neighborhood and Historic Westminster.”*
- *“Staff continue to recruit developers and business investors to Downtown Westminster consistent with the City’s vision for the area. The first ownership residential projects are slated to start construction in late 2020 with a 40-unit condominium project and a 34-unit townhome project. These units are planned to be completed and available for purchase by early 2022. Additionally, staff is finalizing a purchase and sale agreement with a developer to begin construction of a minimum of 115,000 square feet of office in late 2021. The first of two additional office buildings on Block D-2 will commence construction in late 2024. The 255- unit Ascent Westminster with ground floor retail opened in late 2019. The 125-room Origin Hotel, 226-unit Aspire Westminster and 274-unit Westminster Row projects are currently under construction with planned openings from mid-2020 through early 2022. With the addition of these new developments, it brings the overall total to over 715 market rate residential units, 167 affordable residential units, 125 boutique hotel rooms, and over 154,000 square feet of retail. These projects comprise over \$300 million of private investment and over 1.6 million square feet of total development.”*
- *“Staff continue to recruit developers and business investors to Westminster Station consistent with the City’s vision for the area. In October 2019, Staff hosted a development event to showcase the emerging music district, neighborhood partners, and Opportunity Zone investment potential. Staff have also marketed the area through regional publications and featured it on Colorado Public Radio, in addition to continuing to host tours and make presentations to professional groups. The mixed-use development that wraps the parking*



*garage is nearing final development review steps and is expected to break ground Summer 2020. This property will include roughly 17,000 sq. ft. of ground floor commercial space and approximately 145 market-rate apartments. Staff is also in discussions with various developers that represent significant new investment and vision alignment with this neighborhood.*

## **MA-50 Needs and Market Analysis Discussion**

### **Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")**

As shown in HUD's Affirmatively Furthering Fair Housing data tool (screen shot below), cost burden varies by census tract in the City of Westminster. The highest concentrations of cost burden (darkest shading) are located in the southernmost area of the City. In this case "concentration" is indicated by the highest proportional threshold (darkest shading) in the HUD map.

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

For the purposes of this section, a geographic concentration of a demographic group is defined as a Census tract with 150 percent (or 1.5 times) of the county proportion of that group. For example, if 10 percent of residents are Asian but the Asian population of a specific Census tract is 15 percent, that tract would be "concentrated."

The map below shows the percent of non-White and Hispanic—collectively "minority"—residents by Census tract in Adams County. Census tracts with more than 74 percent of non-White and Hispanic (minority) residents are considered a concentration. Minority concentrations exist in 10 Census tracts in the southwest areas of Adams County including one tract in each of Northglenn and Thornton. The remaining tracts are located in Commerce City and in unincorporated Adams County.

By the same definition of concentration—a Census tract with 150 percent (or 1.5 times) of the county proportion of that group—the City of Westminster has Census tracts with a concentration of the following groups:

- Hispanic residents (2 Census tracts),
- Black residents (2 Census tracts),
- Asian residents (8 Census tracts), and
- Native American residents (6 Census tracts).

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

Census tracts with relatively high incidence of housing problems are largely, though not entirely, found in the southern portion of the City. Generally, this means the area of Westminster that is bordered by Zuni Street to the east, U.S. Highway 36 and 80th Avenue to the north, Sheridan Boulevard to the west, and the city boundary to the south. A majority of the Census tracts that meet the definition of "concentrated" in terms of minority residents are also located in the southern portion of the City. The housing market in this broad area varies significantly, but it is generally characterized by lower home

prices, lower rents, and older housing stock than the more recently developed areas of the City to the north and west.

**Are there any community assets in these areas/neighborhoods?**

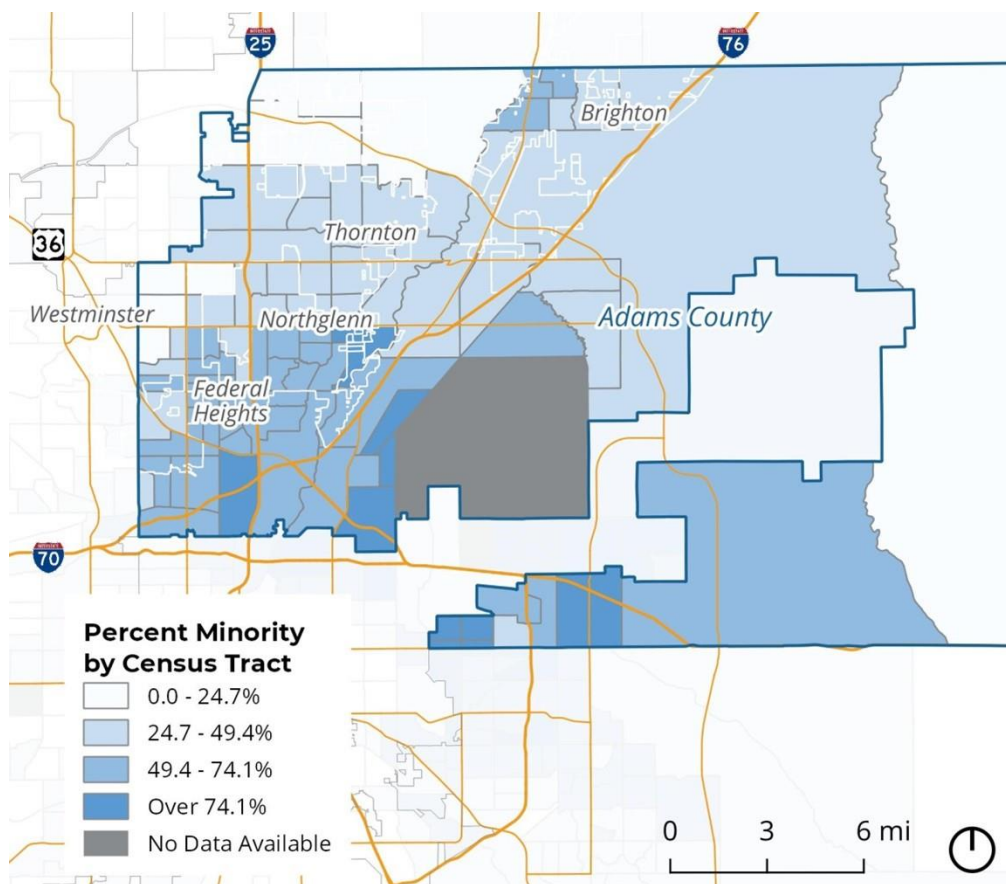
Yes, the southern areas of Westminster include the Westminster Station commuter rail station and adjoining 38-acre regional park, the City's Community Garden, as well as the Little Dry Creek regional trail. There are historic structures such as the Bowles House and Shoenberg Farm site. Community facilities include the Irving Street Library, MAC Recreation Center, and the Swim and Fitness Center. The area is served by Westminster Public Schools, which includes a Science, Technology, Engineering, and Math (STEM) Academy.

**Are there other strategic opportunities in any of these areas?**

With the arrival of commuter rail in Westminster, the Westminster Station Transit-Oriented Development (TOD) Area is at a pivotal point for redevelopment and investment. The City has played a key role in facilitating the redevelopment of the area, as well as recruiting development and investments. Additionally, Downtown Westminster, Historic Westminster, and Westminster Station TOD all fall within designated federal Opportunity Zones. This designation provides an opportunity to attract greater private capital investment in the areas. Furthermore, the City's Comprehensive Plan includes five focus areas where greater development density is planned to occur. These focus areas include: Westminster Station TOD, Downtown Westminster, Church Ranch/Promenade, Orchard/North I-25, and Brookhill. These areas are prioritized in terms of infrastructure investment and are designed to include a mix of uses including housing, employment, and services.



**Housing Cost Burden by Census Tract**



**Percent Minority Residents by Census Tract, Jurisdictions and Adams County, 2018**

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

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

Access to broadband has increasingly become a necessity versus a luxury. Yet, according to the Federal Communications Commission (FCC), in 2017, 34 million Americans still lack broadband Internet access (defined as a minimum of a 25 Mbps connection). People who lack access are increasingly unable to take advantage of the same economic and educational opportunities as those who do have access.

**Westminster access.** According to 2017 ACS data, in the City of Westminster, nearly 3,000 residents do not own a computer. 5,160 (11%) of City residents do not have an Internet subscription, and another 3,442 (8%) rely on a cellular data plan to access the Internet. In August 2020, City staff performed analyses using data from broadband providers as well as demographic data on housing type, age, income, and student status to identify 1,700 households that are likely to be underserved by broadband, meaning that they have no or limited connectivity.

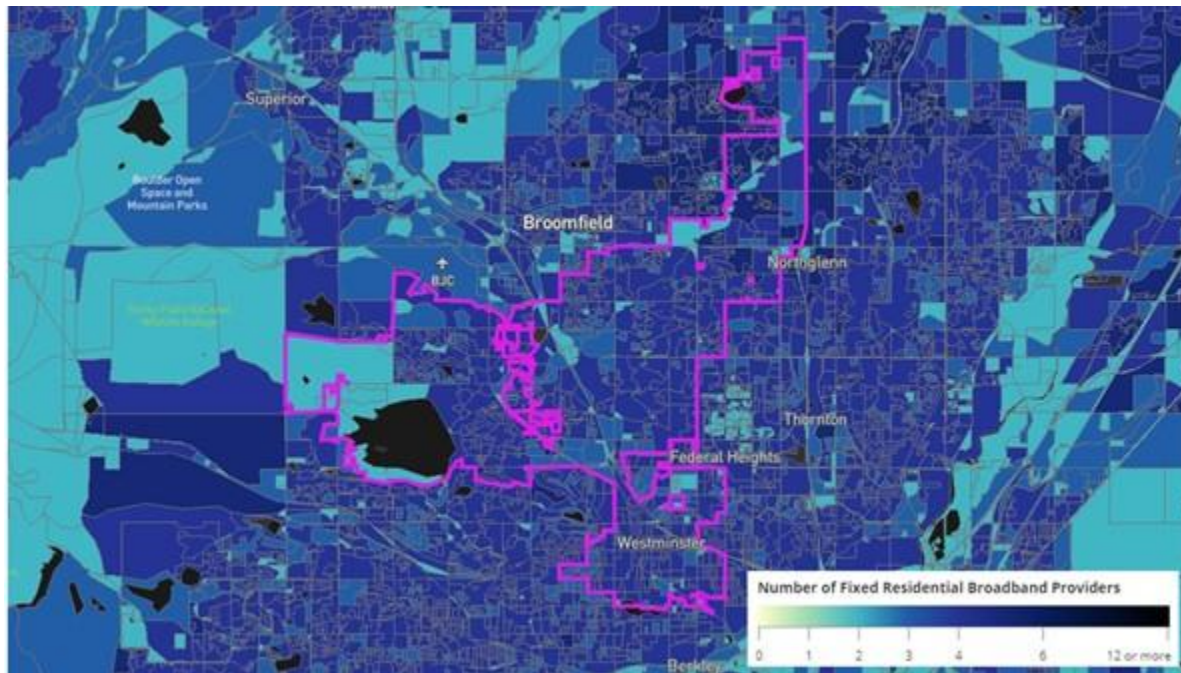
According to the business survey conducted in March 2020, nearly three out of four businesses in Westminster indicated high-speed internet service is excellent or adequate, while 17 percent indicated service was deficient.

**Fiber installation.** The City of Westminster 2017 to 2021 CIP indicates fiber optic cable is installed when or if it can be leveraged with other citywide projects including pipeline installations. Fiber optic cable provides broadband connection but is cost prohibitive to install as a stand-alone project. Leveraging funds for installation simultaneously with other capital improvements has been an effective way to expand the City's fiber network.

**Alternatives to fixed broadband.** To assist households facing broadband access issues that have been exacerbated by the COVID-19 pandemic and the increased necessity for virtual school, the City has taken several steps. Staff sent informational mailers to each of the 1,700 Westminster households estimated to be underserved notifying them of existing subsidized access programs offered by incumbent broadband providers. Staff also worked with Westminster Public Schools to establish mobile hot spots for internet access in some areas, and is currently investigating a pilot program to establish a wireless mesh network that would provide K-12 students internet connectivity free of charge and without the need for in-home fixed connections.

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

According to the FCC database, Westminster is served by at least four broadband providers. The map below illustrates high speed access to multiple providers throughout the City.



**Fixed Broadband Deployment Map All Providers Reporting Service**

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

According to the City of Westminster Hazard Mitigation Plan adopted in 2018, the natural hazard risks for the City associated with climate change include drought, wildfire, flooding, insects, reduced snowpack, reduced water supply, and endangered urban landscapes (lawns, trees, and open space). Additionally, higher temperatures are expected to cause increased energy demand, stress on critical infrastructure, and endanger the health of vulnerable populations such as seniors.

The 2014 Climate Change in Colorado report by the Colorado Water Conservation Board summarized observed changes in the climate over the past 30 to 50 years including:

- Increased temperatures in Colorado 2 degrees Fahrenheit in the past 30 years, 2.5 degrees in the past 50.
- Snowmelt peak runoff begins one to four weeks earlier than 30 years ago.
- Shifts toward the risk of severe soil-moisture drought over the past 30 years.

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

The City of Westminster Hazard Mitigation Plan (2018) identified two high vulnerability populations including residents with access and functional needs and homeless and economically vulnerable residents. The plan emphasizes the need for emergency and disaster planning efforts to provide equal access and reasonable accommodation to residents with disabilities, homeless, and economically vulnerable residents.

More than 14,500 residents in Westminster have some form of disability (i.e. mobility, cognitive, sensory, independent living and self-care) according to the Colorado Department of Public Health and Environment. People with disabilities may have difficulty due to mobility and accessibility issues, cognitive challenges understanding instructions, and difficulty communicating.

Homeless and economically vulnerable residents are less likely to have access to resources to cope with the impact of disasters. According to the Hazard Mitigation Plan (2018) the size of this population is measured in various ways:

- *100 – the approximate number of people living on the streets, in camps or in cars on any given day*
- *An estimated 1000 Westminster K-12 students meet the Department of Education's (DOE) definition of homeless*

- *2,500 – the approximate number dependent on temporary housing with family and friends on a given day (based on DOE standards)*
- *7,500 - estimated number of homeless associated with, but not captured in DOE methodology*
- *10,000 (9% of Westminster population) people living at or below the poverty rate.*
- *In 2017, 12.9% of households were below the poverty level and 15.8% of children were in households with supplemental security income, cash public assistance income or Food Stamps/SNAP benefits.*



# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

This section contains the Strategic Plan that will guide the City of Westminster's allocation of CDBG funding during the 2020-2024 planning period.

The City's goals for the 2020-2024 period will focus on continuing neighborhood revitalization efforts in the City's redeveloping areas and activities pertaining to housing, including improving the quantity and quality of affordable housing, and promoting housing stability through critical repairs. These goals primarily focus on helping residents maintain and improve their quality of life. The City will continue to build on successful projects and programs, such as the Emergency and Essential Home Repair Program, that meet the needs of low- and moderate-income residents and contribute to a thriving and resilient community.

## SP-10 Geographic Priorities - 91.415, 91.215(a)(1)

### Geographic Area

Table 12 - Geographic Priority Areas

1	Area Name:	City-Wide
	Area Type:	Local Target area
	Other Target Area Description:	
	HUD Approval Date:	
	% of Low/ Mod:	
	Revital Type:	Housing
	Other Revital Description:	
	Identify the neighborhood boundaries for this target area.	
	Include specific housing and commercial characteristics of this target area.	
	How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
	Identify the needs in this target area.	
	What are the opportunities for improvement in this target area?	
	Are there barriers to improvement in this target area?	

### General Allocation Priorities

Describe the basis for allocating investments geographically within the state

During the past decade, the City made significant investments and built a base of opportunity in the area now known as Historic Westminster. In the 2020 – 2024 Consolidated Plan, the City will target investments in a broader area to prevent blight and meet urgent community development needs. Generally, this means the area of Westminster that is bordered by Zuni Street to the east, U.S. Highway 36 and 80th Avenue to the north, Sheridan Boulevard to the west, and the city boundary to the south. The area is made up of multiple census block groups in primarily residential areas where more than 51% of the residents are low- and moderate- income persons.

In addition to qualified area investments, CDBG funds will be programmed to provide direct assistance to low-and moderate- income residents through projects that provide direct support to qualifying households. Examples include the continuation of the Emergency and Essential Home Repair program, which provided 90 grants to low-and moderate- income households during the recent Consolidated Plan period. The City will also implement new projects that preserve and support development of affordable housing. CDBG funding will be assigned to two new projects; one to support site improvements for new

affordable housing construction, and the second to fund critical capital improvements on items that impact health, safety, and welfare as a means of preserving existing affordable multi-family properties and protecting their residents.

Between 2020 and 2024, the City will implement new projects that preserve and develop affordable housing in the previously identified area, as well as fund critically needed infrastructure and streetscape improvements.

## SP-25 Priority Needs - 91.415, 91.215(a)(2)

### Priority Needs

Table 13 – Priority Needs Summary

1	<b>Priority Need Name</b>	Increase and Preserve Affordable Housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Families with Children Elderly Public Housing Residents
	<b>Geographic Areas Affected</b>	City-Wide
	<b>Associated Goals</b>	Preserve and Expand Affordable Housing Administration Fair Housing Action Plan
	<b>Description</b>	The City will continue to invest in projects and programs that increase and preserve affordable housing.
	<b>Basis for Relative Priority</b>	Documented need for continued investment in affordable housing throughout the city.
2	<b>Priority Need Name</b>	Infrastructure, Streetscape and Ped Improvements
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Middle Families with Children Elderly Public Housing Residents Non-housing Community Development
	<b>Geographic Areas Affected</b>	City-Wide

	<b>Associated Goals</b>	Infrastructure and Streetscape Improvements Administration Fair Housing Action Plan
	<b>Description</b>	Infrastructure, streetscape and pedestrian improvements in qualified low-and moderate- income areas
	<b>Basis for Relative Priority</b>	The City has identified needed infrastructure improvements in LMI qualifying areas where the facilities are insufficient and is analyzing possible investment to assist with sewer lateral replacement for LMI qualified families and homeowners.

### Narrative (Optional)

Funding priorities will be implemented to achieve the goals and objectives identified in the Strategic Plan for the 2020-2024 program years. The funding priorities were established based on the housing and community development needs identified through staff and City Council's review of priority needs, as well as public and stakeholder input, including the results of the community survey. Also, priority needs are strongly related to the analysis in the Needs Assessment and Market Analysis.

Identified priority needs include:

1. Investments to increase and preserve affordable housing
2. Infrastructure, streetscape and pedestrian improvements in qualified low-and moderate-income areas

The City addresses programmed homeless resources and assistance under PR-10 in this plan. The City has not identified "reducing and ending homelessness" as a priority, as homelessness is addressed through regional response and coordination. As a regional participant to the Denver Metro Continuum of Care (CoC), the City participates in regional planning and provides resources to support individuals and families who are experiencing homelessness. Additionally, the City is a partner in the Adams County Homelessness Reduction Framework Plan and works with the Jefferson County Regional Homeless Navigation Effort. There currently are no shelter facilities within the city limits, and individuals seeking shelter are often transported to the nearest facility with space in either county. The Homeless Navigator and the Police have access to funds to place homeless individuals and families in area motels during severe weather events.

## SP-35 Anticipated Resources - 91.420(b), 91.215(a)(4), 91.220(c)(1,2)

### Introduction

The City of Westminster expects to receive CDBG funding annually for the next five years. For the 2020 program year, the City intends to program a total of \$1,484,522, including the \$631,806 CDBG allocation for 2020 and \$852,716 in previously unallocated funds. These previously unallocated funds are attributed to projects that were canceled and funds that were not fully expended on projects (i.e. projects were completed under budget).

### 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	631,806	0	852,716	1,484,522	2,200,000	CDBG funds will be utilized for program administration, continuation of the Emergency and Essential Home Repair Program, Streetscape and Pedestrian Improvements, Preservation and Upgrades to Existing Affordable Housing and Affordable Housing Site Improvements

Table 14 - Anticipated Resources

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

The City of Westminster's CDBG allocation will complement 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 from the City General Fund that may be utilized for certain contract services. In addition, the City utilizes Private Activity Bond capacity, which provides roughly \$6 million per year for housing activities. Typically, 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.

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

Land Donation for Affordable Housing

Over the past two years, the City has contributed City-owned land for private development in furtherance of affordable housing. This practice is not an automatic contribution to a project, but rather an additional element of financial support that may be provided after a thorough review of a project proforma to determine if there is a financial gap. It also must be clearly demonstrated that a public purpose is served, which is a criteria for review under the City's charter and municipal code. Land sale for the price of \$1 (for tax recording purposes) has been approved for the Holly Park property at West 96th Avenue and Federal Boulevard, which will support construction of 58 affordable townhomes for sale to households earning no more than 100% AMI with the majority sold at prices for 70-80% AMI households. The land will be held in a community land trust to ensure long-term affordability.

The City has another site in the development pipeline that, if approved, would include either a similar \$1 land sale or significantly reduced sale price to Habitat for Humanity to build approximately 40-50 units of affordable townhomes for sale. Similar to the Holly Park property, it is likely that the development project will include a community land trust or comparable ownership structure as a means of ensuring long-term affordability. Whether it is a community land trust, deed restriction, or land lease, the terms are anticipated to include a 99-year period of affordability.

### Infrastructure and Streetscape Improvements in Public Right-of-Way

During the 2020-2024 Consolidated Planning period, a number of programmed infrastructure activities will utilize publicly-owned land. In 2021, the City will invest in needed pedestrian safety and sidewalk improvements on approximately a two-block length of a local street in the Westminster Station TOD neighborhood, where a majority of the current multi-family residences are owned and operated by Maiker Housing Partners. In 2018, Maiker opened a new 70-unit multi-family property that serves households between 30% and 60% of AMI. Over the coming years, Maiker intends to work through each of their properties to demolish and rebuild new affordable units that will both increase the total number of households served, as well as expand the range of income levels in the area and integrate community amenities such as incubator business spaces and day care.

The area is an evolving and redeveloping TOD neighborhood that was previously a primarily industrial area. Part of its redevelopment includes replacing and rebuilding streets and sidewalks to improve connectivity and provide walkable access to the Westminster Station commuter rail service and bus transfer station. Improving resident access to public transit and creating safe sidewalks was an identified need captured in citizen and community input during the previous Consolidated Plan, and remains an essential need that the City will continue to address in the next five years.

Continued below in the Discussion section.

### **Discussion**

Staff is currently investigating the feasibility of an additional use of anticipated CDBG resources during the 2020-2024 Consolidated Planning period, in the form of a sewer lateral repair program. If implemented, this program would fund the repair or replacement of deteriorated or failing sewer laterals for low-moderate income homeowners throughout the City. This program is not described in detail in the 2020 Annual Action Plan as it is still under development and will not be funded in the first year of this Consolidated Plan. It may be included as appropriate in future Annual Action Plans during this Consolidated Planning Period.

### Affordable Housing Site Improvements



The City is also in the process of investing in site improvements on two properties purchased between 2012 and 2014 with a CDBG Section 108 loan to prepare at least one of the sites for affordable housing development. The second site is still being evaluated for a national objective, given its small size and site constraints. Between 2016 and 2019, the City applied CDBG funds to repay a Section 108 loan. The loan was fully repaid in December 2019. The properties were described in the 2015-2019 Consolidated Plan as a proposed mixed-use development that would include both first floor retail and office space and 48 units of affordable housing on the upper levels. After two prolonged attempts with two different developers to realize the proposed vision for the site, the original proposal was abandoned due to its financial unfeasibility, and new options were evaluated. The City has now partnered with Community Resources and Housing Development Corporation (CRHDC), a local non-profit housing developer, to utilize one of the properties to construct 17 units of affordable housing. The second property will be further evaluated for feasible options to meet a national objective once the CRHDC project is approved and moving forward.

## SP-40 Institutional Delivery Structure - 91.415, 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Westminster	Government	Ownership Planning Public Housing Rental public facilities	Jurisdiction
ADAMS COUNTY	Government	Economic Development Homelessness Non-homeless special needs Ownership Planning Public Housing Rental neighborhood improvements public facilities public services	Region
Foothills Regional Housing	Subrecipient	Ownership Rental public services	Jurisdiction
BROTHERS REDEVELOPMENT INC	Subrecipient	public services	Jurisdiction
Maiker Housing Partners (Adams County Housing Authority)	Subrecipient	Rental public services	Jurisdiction

Table 15 - Institutional Delivery Structure

### Assess of Strengths and Gaps in the Institutional Delivery System

The City concentrates its utilization of CDGB funds on community development activities, neighborhood improvements, and supporting housing needs. The City does not have a supportive services program, nor does it fund public services with CDBG funds due to limited staffing resources and the administrative burden associated with complying with federal reporting regulations. As a municipality that spans two counties, human services functions are not handled at the municipal level, but rather through the

county agencies. However, Westminster provides annual funding (\$130,000 in the 2020 budget) to non-profit agencies that provide supportive services through its Human Services Board that is funded by the City's General Fund budget.

The full spectrum of sheltering options for persons experiencing homelessness are outlined below. According to the City's Shelter Programs 2019 report, "all options except 'temporary shelter' are available in either Adams or Jefferson counties."

The full spectrum of sheltering for persons experiencing homelessness identified in the report include:

- Motel or Hotel Stays Paid for by an Agency
- Emergency Weather Sheltering
- Rotational Sheltering throughout the Year
- Safe Parking Programs
- Transitional Housing
- Rapid Rehousing
- Permanent Supportive Housing (PSH)

In 2019, Adams County conducted a survey with service providers for the Adams County Homelessness Action Plan. The following table shows the top 10 service needs identified by service professionals (236 participated in the survey), the percent of providers who agree this is a need, and the percent of providers who provide the service. Although there are limitations to the data due to the limits of its administration method, this exercise provides a reasonable perception of service provision mismatches in the county compared to needs.

- Affordable housing
- Accessible Housing
- Housing vouchers
- Food
- Shelter
- Transportation Assistance
- Rental Assistance
- Jobs
- Hotel vouchers
- Rental deposits

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	
Legal Assistance	X		
Mortgage Assistance	X		
Rental Assistance	X		
Utilities Assistance	X		
<b>Street Outreach Services</b>			
Law Enforcement	X		
Mobile Clinics			
Other Street Outreach Services	X		
<b>Supportive Services</b>			
Alcohol & Drug Abuse	X		
Child Care	X		
Education	X		
Employment and Employment Training	X		
Healthcare	X		
HIV/AIDS	X		
Life Skills	X		
Mental Health Counseling	X		
Transportation	X		
<b>Other</b>			

**Table 16 - Homeless Prevention Services Summary**

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

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 may not be located within the City's boundaries. These non-profits serve the homeless 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.

The City and Adams County Consortium members have pooled HOME funds to establish a Tenant Based Rental Assistance (TBRA) program that seeks to match individuals and families that are ready to move

into housing with rental support. Under the federal guidelines for the program, some assistance can also be provided for security deposits and utilities when paired with rental assistance.

CARES Act funds, which currently expire at the end of 2020, have been programmed for administration by Maiker Housing Partners and Foothills Regional Housing to assist landlords, tenants, and homeowners with rent and mortgage assistance, including the opportunity to provide transitional housing for identified candidates. More will be known about the success of this program when the fund reports are provided in 2021, which will also inform future efforts. Additionally, a portion of the CARES Act funds have gone to supplementing the annual assistance already provided by the City to Colorado Legal Services to assist in eviction mediation and rapid settlement of eviction filings.

Community Resources and Housing Development Corporation (CRHDC), 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). 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.

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

Please see above.

**Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The City will continue to explore ways in which it may increase its support of public service providers within the financial limitations of the budget that has been significantly impacted by the pandemic. The City's Human Services Board grant program has been strengthened and provided support to a number of critical service providers. The City anticipates working with non-profit housing providers in the delivery of projects in the coming Consolidated Planning period and will continue to explore ways to support these organizations and help build their capacity by leveraging funding support from local, state and federal sources as efficiently and effectively as possible.

**Fair Housing Action Plan**

The recommended Fair Housing Action Plan (FHAP) for the City is included in the Grantee Unique Appendix. These action items focus on what the City can reasonably do to address the impediments to and affirmatively further fair housing (AFFH), given its staff and financial capacity. Other public entities, nonprofits, and private sector partners can play a role and buttress the City’s AFFH activities. The FHAP is contained in the matrix in the Grantee Unique Appendix, which links the action items to the identified impediments, potential partners, timeline, and outcomes.

## SP-45 Goals - 91.415, 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve and Expand Affordable Housing	2020	2024	Affordable Housing Non-Homeless Special Needs	City-Wide	Increase and Preserve Affordable Housing	CDBG: \$780,000	Rental units constructed: 200 Household Housing Unit  Rental units rehabilitated: 25 Household Housing Unit  Homeowner Housing Rehabilitated: 25 Household Housing Unit
2	Infrastructure and Streetscape Improvements	2020	2024	Non-Housing Community Development	City-Wide	Infrastructure, Streetscape and Ped Improvements	CDBG: \$578,161	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 400 Persons Assisted
3	Administration	2020	2024	Administration	City-Wide	Increase and Preserve Affordable Housing Infrastructure, Streetscape and Ped Improvements	CDBG: \$126,361	Other: 0 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Fair Housing Action Plan	2020	2024	Affordable Housing	City-Wide	Increase and Preserve Affordable Housing Infrastructure, Streetscape and Ped Improvements	CDBG: \$0	Other: 0 Other

**Table 17 – Goals Summary**

## Goal Descriptions



1	<b>Goal Name</b>	Preserve and Expand Affordable Housing
	<b>Goal Description</b>	<p>The City has the following affordable housing goals to address the needs of extremely low-income, low-income, and moderate-income residents:</p> <ul style="list-style-type: none"> <li>• Rental units available for 30% - 80% AMI: The City will invest in projects to both preserve and support both non-profit and private developers building new affordable housing. These activities may be funded throughout the City through mechanisms that include land donation, tax and fee rebates, or other financial assistance tools as they may be approved on a project-specific basis by City Council.</li> <li>• Partner with CRHDC on the development of 17 apartment units specifically for senior residents for 50% - 120% AMI households.</li> <li>• Maiker Housing Partners anticipates replacing two buildings that currently have 114 income-restricted apartments with a new development that will provide 229 income-restricted rental units, adding 115 new homes to the area. As part of a larger replacement effort of Maiker's housing stock in the TOD neighborhood, the number of units may increase, depending upon funding availability, which will also determine the AMI ranges served.</li> <li>• Complete 58 units of for-sale townhomes in coordination with ULC and Thrive Homebuilders at Holly Park with the majority offered for 70-80% AMI households.</li> <li>• Facilitate 40-50 units of for-sale townhomes in coordination with Habitat for Humanity with specifics yet to be determined but limited to 80% AMI or below households.</li> <li>• Support fulfillment of a required 25 units of affordable for-sale townhomes at Bradburn Village</li> </ul>
2	<b>Goal Name</b>	Infrastructure and Streetscape Improvements
	<b>Goal Description</b>	Complete pedestrian and streetscape improvements on four linear blocks in eligible low- and moderate-income areas.
3	<b>Goal Name</b>	Administration
	<b>Goal Description</b>	Administrative activities related to administering CDBG funds and programs.

4	<b>Goal Name</b>	Fair Housing Action Plan
	<b>Goal Description</b>	The FHAP action items focus on what the City can reasonably do to address the impediments to and affirmatively further fair housing (AFFH), given its staff and financial capacity. Other public entities, nonprofits, and private sector partners can play a role and buttress the City's AFFH activities.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

In addition, the City has worked closely with private development partners to qualify for federal and state LIHTC to produce affordable housing as a component of new development and will continue to leverage opportunities provided by both private and non-profit developers. The City is working in partnership with the Urban Land Conservancy (ULC) and Habitat for Humanity to establish community land-trusts and develop for-sale affordable housing that will be protected for long-term affordability.

The City has the following affordable housing goals to address the needs of extremely low-income, low-income, and moderate-income residents:

- Rental units available for 30% - 80% AMI: The City will invest in projects to both preserve and support both non-profit and private developers building new affordable housing. These activities may be funded throughout the City through mechanisms that include land donation, tax and fee rebates, or other financial assistance tools as they may be approved on a project-specific basis by City Council.
- Partner with CRHDC on the development of 17 apartment units specifically for senior residents for 50% - 120% AMI households.
- Maiker Housing Partners anticipates replacing two buildings that currently have 114 income-restricted apartments with a new development that will provide 229 income-restricted rental units, adding 115 new homes to the area. As part of a larger replacement effort of Maiker's housing stock in the TOD neighborhood, the number of units may increase, depending upon funding availability, which will also determine the AMI ranges served.
- Complete 58 units of for-sale townhomes in coordination with ULC and Thrive Homebuilders at Holly Park with the majority offered for 70-80% AMI households.
- Facilitate 40-50 units of for-sale townhomes in coordination with Habitat for Humanity with specifics yet to be determined but limited to 80% AMI or below households.
- Support fulfillment of a required 25 units of affordable for-sale townhomes at Bradburn Village

## **SP-65 Lead-based Paint Hazards - 91.415, 91.215(i)**

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

The City directly addresses Lead-based Paint Hazards (LBP) and increases access to housing without LBP hazards through its Emergency and Essential Home Repair Program. For the City's home rehabilitation program, administered jointly by Foothills Regional Housing and Brothers Redevelopment, Inc., 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:

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

\*The minimal ("de minimus") area - safe work practices and clearance are not required when maintenance or hazard reduction activities do not disturb painted surfaces that total more 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., window sills, 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 Redevelopment, Inc. 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.

Finally, in addition to HUD's LBP regulations, housing authorities and authorized subrecipients performing work must meet the Environmental Protection Agency's (EPA) Renovation, Repair and Painting Rule (RRP). Common renovation activities like sanding, cutting, and demolition can create hazardous lead dust and chips by disturbing lead-based paint, which can be harmful to adults and children. To protect against this risk, on April 22, 2008, EPA issued the RRP rule. It requires that firms performing renovation, repair, and painting projects that disturb lead-based paint in pre-1978 homes, child care facilities, and schools be certified by EPA and that they use certified renovators who are trained by EPA-approved training providers to follow lead-safe work practices. Individuals can become certified renovators by taking an eight-hour training course from an EPA-approved training provider.

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

Please see above.

## **SP-70 Anti-Poverty Strategy - 91.415, 91.215(j)**

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

Similar to the State of Colorado as a whole, the poverty rate in Westminster declined from 2015 to 2018. During this time, Colorado's poverty rate decreased from 11.5 percent in 2015 to 9.6 percent in 2018, and the City's poverty rate decreased from 7.9 percent to 5.5 percent. Westminster's poverty rate is almost half that of the state, and is also much lower than that of Adams County (8.8%) and Jefferson County (6.9%).

Westminster's approach to addressing the needs of poverty level families is through: 1) Direct assistance to stabilize and support households and families and prevent homelessness; and 2) Building economic capacity among households.

**Direct assistance** is provided through free and low-cost programs subsidized by the City and its community partners. The City maintains an accessible website with resources for affordable internet, energy rebates and discounts, recreation opportunities, business and employment training, food assistance, discounted healthcare, home repair programs, legal aid and mediation services, and utilities and water bill assistance. The City offers updated resource guides and links to programs and services here: <https://www.cityofwestminster.us/LiveBetter>. Additionally, resources have been expanded in response to the pandemic, and those can be found here: <https://www.cityofwestminster.us/covid-19>.

**Economic capacity.** The City is continually working to provide more job opportunities for residents of all skill levels with Westminster employers. The Center for Career and Community Enrichment (3CE) in Westminster provides a "one-stop-shop" to access services and educational classes that support adults on their path to self-sufficiency. Classes include GED, ESL, Job Skills, Parenting, Building a Network, Anger Management, and others. A small public computer lab is available for those who do not have internet access at home – primarily serving job seekers and those looking for housing. Staff are available to help customers' access online information and services, such as applying for Colorado PEAK benefits. Finally, the City's Economic Development Department functions to retain, expand, and attract businesses to bring jobs into Westminster.

Education is also a primary tool in combating poverty. Westminster is fortunate to have both a large community college and several university programs located within its borders or in adjacent communities. The City also has close ties with the three school districts that serve Westminster residents, which are continually working to increase educational attainment levels and high school graduation rates.

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

Maintaining and expanding a mix of housing opportunities, including affordable housing for Westminster residents, is critical to the City's goal of reducing poverty. During the 2020-2024

Consolidated Planning period, the City will continue to focus on maintaining and expanding its stock of affordable rental and homeownership units. There is a concerted effort to disperse affordable housing throughout the City and making strategic efforts to locate these development projects in close proximity to transit, as well as employment and education centers. The City will also continue to encourage the provision of onsite child care, employment training, youth programming, and support for vulnerable workers and industries (e.g., arts, retail) within new residential development.

Homeownership is one of the primary wealth-building mechanisms in this country, and while it may not be the desired path for all residents, removing barriers to entry for those who do seek it is critical. To that end, during the 2020-2024 Consolidated Plan period, significant effort will be placed on supporting the development of new affordable ownership opportunities. This occurs both through City support on development projects, as well as support for programs and organizations that help homeowners prepare for and finance home purchases.

The City will continue its Emergency and Essential Home Repair Program, which assists low-income Westminster owner-occupied households in making improvements to their homes and introduce a new program aimed at making critical repairs to affordable multifamily properties. Preservation of affordable housing stock, both rental and ownership-based, provides a stabilizing influence. Through these programs, as well as ongoing support for Colorado Legal Services to offer assistance with eviction mediation and settlement, the City seeks to reduce displacement and disrupt the cycle of poverty.

#### **Needs of persons experiencing homelessness.**

**Needs of persons experiencing homelessness.** The City's 2019 Strategic Plan included an action item to, "Continue to pursue local and regional strategies for addressing homelessness with emphasis on teen and family populations, including cooperation with other governments, non-profits, and grant opportunities." In the Strategic Plan Update in the fall of 2019 the following efforts were underway to address the needs of people experiencing homelessness in Westminster and the broader region:

*"Staff continue to pursue local and regional strategies for addressing homelessness with emphasis on teen and family populations, including collaborating with other governments and non-profits as well as pursuing grant opportunities. These efforts include launching the Wellness Court in May of 2019, hosting Shower and Laundry Trucks at Irving Street Library, and working with Jefferson County jurisdictions to create a Homeless Navigator Team to conduct street outreach and connect those living outdoors or in cars to housing. Additionally, Staff helped at the Community Cares event that brought together 17 local and regional partner organizations to assist populations experiencing poverty and homelessness."*

## **SP-80 Monitoring - 91.230**

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

Management, oversight, and monitoring of the CDBG program is performed by the Department of Economic Development with support from other departments such as Finance and Community Development. The Adams County Department of Community and Economic Development manages and monitors the HOME Investment Partnership (HOME) program. The City is committed to taking all appropriate steps, as outlined by HUD, to ensure compliance with applicable laws, procedures, and eligibility requirements. CDBG funds are disbursed by the City's Finance Department.

City staff monitors contractor compliance by the following means:

1. Construction and consultant contracts
2. Environmental review of CDBG projects
3. Davis-Bacon Wage determination of individual projects and applicable compliance requirements
4. Davis Bacon Semi-Annual Reports
5. City and contractor Draw-Down requests
6. Minority Business Enterprise (MBE) Reports
7. Program Action Plan Submission
8. Consolidated Annual Performance Evaluation Report (CAPER)
9. Integrated Information Disbursement System (IDIS) reporting and maintenance
10. Maintaining the CDBG rate of expenditure to comply with HUD spending goals
11. Federal Cash Transaction Quarterly Report Submissions
12. City staff's program compliance calendar
13. Project site visits to compare reported activity with actual accomplishments

## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

The City of Westminster expects to receive CDBG funding annually for the next five years. For the 2020 program year, the City intends to program a total of \$1,484,522, including the \$631,806 CDBG allocation for 2020 and \$852,716 in previously unallocated funds. These previously unallocated funds are attributed to projects that were canceled and funds that were not fully expended on projects (i.e. projects were completed under budget).

#### 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	631,806	0	852,716	1,484,522	2,200,000	CDBG funds will be utilized for program administration, continuation of the Emergency and Essential Home Repair Program, Streetscape and Pedestrian Improvements, Preservation and Upgrades to Existing Affordable Housing and Affordable Housing Site Improvements

**Table 18 - 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 City of Westminster's CDBG allocation will complement 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 from the City General Fund that may be utilized for certain contract services. In addition, the City utilizes Private Activity Bond capacity, which provides roughly \$6 million per year for housing activities. Typically, 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.

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

Land Donation for Affordable Housing

Over the past two years, the City has contributed City-owned land for private development in furtherance of affordable housing. This practice is not an automatic contribution to a project, but rather an additional element of financial support that may be provided after a thorough review of a project proforma to determine if there is a financial gap. It also must be clearly demonstrated that a public purpose is served, which is a criteria for review under the City's charter and municipal code. Land sale for the price of \$1 (for tax recording purposes) has been approved for the Holly Park property at West 96th Avenue and Federal Boulevard, which will support construction of 58 affordable townhomes for sale to households earning no more than 100% AMI with the majority sold at prices for 70-80% AMI households. The land will be held in a community land trust to ensure long-term affordability.

The City has another site in the development pipeline that, if approved, would include either a similar \$1 land sale or significantly reduced sale price to Habitat for Humanity to build approximately 40-50 units of affordable townhomes for sale. Similar to the Holly Park property, it is likely that the development project will include a community land trust or comparable ownership structure as a means of ensuring long-term affordability. Whether it is a community land trust, deed restriction, or land lease, the terms are anticipated to include a 99-year period of affordability.

Infrastructure and Streetscape Improvements in Public Right-of-Way

During the 2020-2024 Consolidated Planning period, a number of programmed infrastructure activities will utilize publicly-owned land. In 2021, the City will invest in needed pedestrian safety and sidewalk improvements on approximately a two-block length of a local street in the Westminster Station TOD neighborhood, where a majority of the current multi-family residences are owned and operated by Maiker Housing Partners. In 2018, Maiker opened a new 70-unit multi-family property that serves households between 30% and 60% of AMI. Over the coming years, Maiker intends to work through each of their properties to demolish and rebuild new affordable units that will both increase the total number of households served, as well as expand the range of income levels in the area and integrate community amenities such as incubator business spaces and day care.

The area is an evolving and redeveloping TOD neighborhood that was previously a primarily industrial area. Part of its redevelopment includes replacing and rebuilding streets and sidewalks to improve connectivity and provide walkable access to the Westminster Station commuter rail service and bus transfer station. Improving resident access to public transit and creating safe sidewalks was an identified need captured in citizen and community input during the previous Consolidated Plan, and remains an

essential need that the City will continue to address in the next five years.

Continued below in the Discussion section.

## **Discussion**

Staff is currently investigating the feasibility of an additional use of anticipated CDBG resources during the 2020-2024 Consolidated Planning period, in the form of a sewer lateral repair program. If implemented, this program would fund the repair or replacement of deteriorated or failing sewer laterals for low-moderate income homeowners throughout the City. This program is not described in detail in the 2020 Annual Action Plan as it is still under development and will not be funded in the first year of this Consolidated Plan. It may be included as appropriate in future Annual Action Plans during this Consolidated Planning Period.

### Affordable Housing Site Improvements

The City is also in the process of investing in site improvements on two properties purchased between 2012 and 2014 with a CDBG Section 108 loan to prepare at least one of the sites for affordable housing development. The second site is still being evaluated for a national objective, given its small size and site constraints. Between 2016 and 2019, the City applied CDBG funds to repay a Section 108 loan. The loan was fully repaid in December 2019. The properties were described in the 2015-2019 Consolidated Plan as a proposed mixed-use development that would include both first floor retail and office space and 48 units of affordable housing on the upper levels. After two prolonged attempts with two different developers to realize the proposed vision for the site, the original proposal was abandoned due to its financial unfeasibility, and new options were evaluated. The City has now partnered with Community Resources and Housing Development Corporation (CRHDC), a local non-profit housing developer, to utilize one of the properties to construct 17 units of affordable housing. The second property will be further evaluated for feasible options to meet a national objective once the CRHDC project is approved and moving forward.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Preserve and Expand Affordable Housing	2020	2024	Affordable Housing Non-Homeless Special Needs	City-Wide	Increase and Preserve Affordable Housing	CDBG: \$780,000	Rental units constructed: 17 Household Housing Unit Rental units rehabilitated: 20 Household Housing Unit Homeowner Housing Rehabilitated: 10 Household Housing Unit
2	Infrastructure and Streetscape Improvements	2020	2024	Non-Housing Community Development	City-Wide	Infrastructure, Streetscape and Ped Improvements	CDBG: \$578,161	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 400 Persons Assisted
3	Administration	2020	2024	Administration	City-Wide	Increase and Preserve Affordable Housing Infrastructure, Streetscape and Ped Improvements	CDBG: \$126,361	Other: 1 Other

Table 19 – Goals Summary

#### Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Preserve and Expand Affordable Housing
	<b>Goal Description</b>	<p>In 2021, an estimated 15 low- and moderate-income Westminster homeowners will be assisted through the Emergency and Essential Home Repair Program.</p> <p>Additionally, an estimated 20 apartments in a multi-family housing development will be assisted through the Affordable Housing Preservation program/project.</p> <p>New construction of 17 affordable senior apartments and a community space is planned with support from the Affordable Housing Site Improvements program/project. This development is dependent on financing and land approval processes that are currently ongoing, and if approved the units will not be delivered until late 2021 or early 2022. Therefore these 17 units are not included in the Goal Outcome Indicator column in the table above, as they will not be complete by the end of the 2020 Annual Action Plan.</p>
<b>2</b>	<b>Goal Name</b>	Infrastructure and Streetscape Improvements
	<b>Goal Description</b>	<p>In 2021, enhanced pedestrian access and safety improvements will be completed on two blocks of Hooker Street between West 72 Avenue and Westminster Station. Residents will benefit from improved safety and accessibility with street lighting installation and other sidewalk improvements. Environmental reviews may be commenced for additional areas, subject to the timing of development projects. Staff will begin feasibility analysis for the potential to provide direct grants to LMI households in need of sewer lateral replacement.</p>
<b>3</b>	<b>Goal Name</b>	Administration
	<b>Goal Description</b>	General administration associated with CDBG.

## **AP-35 Projects - 91.420, 91.220(d)**

### **Introduction**

The allocation of funds and project selected are closely aligned with the top housing and community development needs identified in the needs assessment, market analysis, community survey, and contributed by stakeholders and citizens who participated in the development of the Consolidated Plan.

#	Project Name
1	Affordable Housing Site Improvements
2	Affordable Housing Preservation
3	Infrastructure and Streetscape Improvements
4	Project Administration
5	Emergency and Essential Home Repair Program

**Table 20 – Project Information**

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

The allocation of funds is closely aligned with the top housing and community development needs identified in the needs assessment, market analysis, community survey, and contributed by stakeholders and citizens who participated in the development of the Consolidated Plan.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	Affordable Housing Site Improvements
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Preserve and Expand Affordable Housing
	<b>Needs Addressed</b>	Increase and Preserve Affordable Housing
	<b>Funding</b>	CDBG: \$250,000
	<b>Description</b>	The Affordable Housing Site Improvements funds will provide support to non-profit and private developers for projects that include affordable housing. The funding can be used to support sidewalks and streetscape, site clearance, and improvements that are separate from the building construction. The funds will help make proposed affordable housing financially viable by supporting some of the project costs and avoiding pass through on rents.
	<b>Target Date</b>	12/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Between 10 and 20 households, based on projects in the pipeline for construction in 2021. It is anticipated that this will go toward a project serving households earning 50% - 120% of AMI.
	<b>Location Description</b>	The funds can be used for any qualifying affordable housing development in the City.
	<b>Planned Activities</b>	The Affordable Housing Site Improvements funds will be direct investments in site improvements provided to qualified projects where the housing provided serves the CDBG defined population.
2	<b>Project Name</b>	Affordable Housing Preservation
	<b>Target Area</b>	City-Wide

	<b>Goals Supported</b>	Preserve and Expand Affordable Housing
	<b>Needs Addressed</b>	Increase and Preserve Affordable Housing
	<b>Funding</b>	CDBG: \$490,000
	<b>Description</b>	The Affordable Housing Preservation Project will provide grants to qualifying property owners for income-restricted properties that currently serve low- to moderate-income residents. Westminster has over 16 affordable multi-family properties that are over 30 years in service, many of which are owned by non-profit organizations and public housing authorities. To ensure the continued availability of these currently affordable apartments, the City is establishing a grant fund to be used by landlords to address health, welfare and safety needs for the residents and ensure that the property owners can address critical repairs and maintenance.
	<b>Target Date</b>	12/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 20 households will benefit in the first year.
	<b>Location Description</b>	The funds can be used for any qualifying affordable housing development in the City.
	<b>Planned Activities</b>	The Affordable Housing Preservation Project will provide grants to property owners for qualifying income-restricted properties that currently serve low- to moderate-income residents. There are a significant number of aging multi-family properties throughout Westminster that currently supply affordable housing. At least 24 buildings located in these 16 multi-family properties are owned by non-profit and public housing authorities. To ensure the continued availability of these currently affordable apartments, the City is funding a project to address health, safety and welfare for the residents and ensure the property owners can address critical repairs and maintenance.
<b>3</b>	<b>Project Name</b>	Infrastructure and Streetscape Improvements
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Infrastructure and Streetscape Improvements



	<b>Needs Addressed</b>	Infrastructure, Streetscape and Ped Improvements
	<b>Funding</b>	CDBG: \$578,161
	<b>Description</b>	The Infrastructure and Streetscape Improvements project will upgrade streetscape and lighting on streets with deteriorating or inadequate conditions in low-moderate income Census tracts. The City will begin with a project to reconstruct sidewalks and add lighting on public right-of-way adjacent to income-restricted properties in the TOD neighborhood on Hooker Street, between West 71st Ave and West 72nd Ave.
	<b>Target Date</b>	12/31/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Over four hundred low- to moderate-income households will benefit from the proposed project for 2021 on Hooker Street, based on current neighborhood population. However, since this local street is the primary route to regional transit, the benefits may be further reaching.
	<b>Location Description</b>	The first infrastructure and streetscape improvement projects will focus on the streets that serve the TOD neighborhood, which is bordered by Westminster Station and a regional park on the south at approximately West 69th Avenue, Lowell Boulevard on the west, West 72nd Avenue on the north, and Federal Boulevard on the east.
	<b>Planned Activities</b>	The Infrastructure and Streetscape Improvements project that has been in planning during the 2019 program year will transition to construction of streetscape and lighting on Hooker Street between West 71st Avenue and West 72nd Avenue.
<b>4</b>	<b>Project Name</b>	Project Administration
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Administration
	<b>Needs Addressed</b>	Increase and Preserve Affordable Housing Infrastructure, Streetscape and Ped Improvements
	<b>Funding</b>	CDBG: \$126,361

	<b>Description</b>	In 2020, 20 percent of the City's CDBG allocation will be used to fund program administration and planning activities. This includes general management and oversight coordination, Fair Housing activities, and program monitoring and reporting, along with the salary of the CDBG Planning Technician.
	<b>Target Date</b>	12/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Program administration and planning activities, including: general management and oversight coordination, Fair Housing activities, and program monitoring and reporting.
5	<b>Project Name</b>	Emergency and Essential Home Repair Program
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Preserve and Expand Affordable Housing
	<b>Needs Addressed</b>	Increase and Preserve Affordable Housing
	<b>Funding</b>	CDBG: \$40,000
	<b>Description</b>	The Emergency and Essential Home Repair (EEHR) Program helps qualified, low- to moderate-income homeowners make needed repairs to their homes that will improve their safety and mobility. Through the program, up to \$5,000 in eligible minor and emergency home repairs can be provided at no charge to Westminster residents.
	<b>Target Date</b>	12/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 15 low- to moderate-income homeowners will benefit. The program has been impacted by the pandemic and the ability to serve residents in their homes, given safety protocols. Funds can be carried forward to future program years if needed and is already drawing from a balance left from 2019 that was unable to be fully utilized due to the pandemic.

	<b>Location Description</b>	The EEHR Program is made available to all qualifying residents of the City of Westminster, regardless of location.
	<b>Planned Activities</b>	The EEHR Program helps qualified, low- to moderate-income homeowners make needed repairs to their homes that will improve their safety and mobility. Through the program, up to \$5,000 in eligible minor and emergency home repairs can be provided at no charge to Westminster residents. The funding assigned to the program has been decreased for 2020 to allow the program to spend down unspent funds from 2018 and 2019. The EEHR Programs balance in the CDBG account is approximately \$220,000.

## **AP-50 Geographic Distribution - 91.420, 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 will actively look for opportunities to improve the lives of residents by seeking opportunities to support projects in all qualified low- and moderate- income (LMI) areas in the City. During the 2015-2019 Consolidated Planning period, a number of projects were focused on identified needs in an area formerly identified as South Westminster. South Westminster, as defined in the 2001 South Westminster Strategic Revitalization Plan, is located in the southeastern section of the City, bordered by Zuni Street to the east, U.S. Highway 36 and 80th Avenue to the north, Sheridan Boulevard to the west, and the city boundary to the south.

In recent years, as a result of the creation of the Westminster Station Special Plan District and community visioning efforts in the Harris Park neighborhood, the geographic terminology has changed. As the southern area of Westminster still has a number of neighborhoods with LMI and minority resident concentrations, additional projects are planned for this geographic area.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
City-Wide	100

**Table 21 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

Census data indicates that 51 percent or more of the households in the southern part of Westminster are considered low- and moderate-income. Additionally, aging housing stock, deteriorating infrastructure, a lack of developable land, and blighted properties and buildings all exist within the area. Citizen and supportive service agency input gathered through the consultation and citizen participation process confirms that this area of Westminster remains in need of investment. For purposes of geographic definition, the City intends to look for investments in low- and moderate-income neighborhoods throughout Westminster and does not expect to be singularly focused on the southern part Westminster during the next five-years, though that is still where the majority of qualified census tracts exist.

The Emergency and Essential Home Repair Program will also likely benefit individual homeowners within the southern area of Westminster, but it is not limited to that area. The program is offered to income-qualified Westminster homeowners. Since these projects are not restricted to a specific area, Staff is unable to determine how many target area residents may be served. A similarly structured program to assist income-qualifying homeowners in replacing deteriorating or failed sewer laterals is also under

consideration, and could potentially also be applied citywide rather than restricted to LMI areas.

In 2021, three proposed new projects will provide investments in the southern part of Westminster. Affordable Housing Site Improvements will be applied to the CDBG property at West 73rd Avenue and Lowell Boulevard, which is in planning for development of 17 affordable senior apartments. Two affordable housing providers currently located in the southern part of Westminster have signaled an interest in applying for the Affordable Housing Preservation funding to invest in multi-family properties in need of assistance with deferred maintenance items impacting health, safety and welfare. And finally, the Infrastructure and Streetscape Improvement program will be launched with a project to provide two blocks of pedestrian safety and streetscape improvements in the TOD neighborhood on Hooker Street from West 71st Avenue to West 72nd Avenue.

## **Discussion**

Please see above.

## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

This section describes other actions that the City will undertake during the program year to help fulfill the annual goals and objectives.

### **Actions planned to address obstacles to meeting underserved needs**

For a city of its size, Westminster demonstrates an exceptional commitment to addressing underserved needs. In addition to the projects developed to achieve the City's annual goals, the City also invests both staff resources and additional funding to support residents' needs for social services, as well as leveraging other available state and federal funds to support additional affordable housing initiatives.

As described elsewhere in this document, Westminster dedicates general funds to provide operations support to non-profits that provide supportive services to residents. The reason for this is twofold: 1) Local funding reduces the administrative burden on non-profits receiving small federal grants that require a great deal of compliance activity; and 2) Local funding reduces the administrative burden on City staff, freeing up staff time for substantive revitalization projects and programs. The Human Services Board (HSB) makes recommendations to City Council for the allocation of funds to support the mission of providing assistance to Westminster residents through clothing, food, shelter, and mental and physical health services. In the Adopted 2019-2020 Budget, City Council increased the available funds for the HSB to \$130,000 (from \$90,000 in the last Consolidated Plan) in an effort to meet some of the increased need in the community.

The City is home to the Adams County Human Services Center which provides "one stop shopping" to residents needing resources for Health First Colorado, food assistance (SNAP), Colorado Works/TANF, child care (CCCAP), utilities (LEAP), and employment/skill building.

In 2018, the City conducted a comprehensive study to identify gaps in access to City services for non-English speakers and readers and persons with disabilities. That study contained department-level recommendations for expanding language access. The City's draft Language Access Plan is in final review and will be implemented by 2021.

Since the last Consolidated Plan was developed, the City formed an Inclusivity Board to guide approaches to inclusivity and diversity. The Inclusivity Board has become a valuable support to the elected officials and City staff for their lens on how complex municipal governance issues impact the City's low-income and marginalized communities.

### **Actions planned to foster and maintain affordable housing**

The City is launching two programs with the 2020 Consolidated Plan to both foster development of affordable housing and preserve multi-family housing stock that is currently affordable. One program

will provide grants to existing affordable multifamily housing property owners to address identified capital needs while prioritizing resident safety and energy efficiency, thereby improving resident quality of life and preserving long-term affordability. The second program provides funds to affordable housing developers to defray costs associated with site preparation and streetscape improvements, helping to close funding gaps and increase the affordable housing stock in the City. Both programs will utilize CDBG funds.

The City has also supported the development of new affordable housing through its allocation of HOME funds from Adams County. The City has provided HOME funds to support low- to moderate-income housing for both families and for seniors. Since 2015, the City has provided \$400,000 in HOME funds to two projects that combined to construct 139 units of income-restricted housing in Westminster.

Private Activity Bond (PAB) allocations are issued by the State pursuant to federal regulations to support certain private activities such as residential mortgage programs, construction of affordable housing, and certain redevelopment projects. The City has used its PAB allocation for a variety of affordable housing efforts, and during the 2015-2019 Consolidated Plan assigned over \$20 million in PAB capacity to CHFA for both a low-interest mortgage program for qualifying low- to moderate-income homebuyers, and as bond capacity for two local multi-family housing developments awarded 4% LIHTC. In 2020, the City provided CHFA with PAB assignment of \$6,028,132 to apply toward low-interest mortgages for first time homebuyers and veterans.

The City also provides its Emergency and Essential Home Repair Program, which helps qualified, low-income homeowners make repairs that improve their home safety and mobility. Through the program, up to \$5,000 in eligible essential and emergency home repairs can be made free of charge to income-qualified households.

The City has a rental housing maintenance code and inspection program that promotes decent, safe, and sanitary housing conditions for renters. More information on the program can be found here:

<https://www.cityofwestminster.us/Government/Departments/CommunityDevelopment/RentalPropertyInspection>.

Since the last Consolidated Plan, Westminster's redevelopment of an aging regional mall into a downtown center has progressed and prioritized affordable housing with a goal that 20 percent of all residential units in Downtown Westminster be affordable. At the end of 2020, Downtown Westminster has 118 units serving 30-60% AMI and 26 units serving up to 80% AMI with another 23 under construction. The City has also supported the development of a balanced housing strategy in the Westminster Station TOD neighborhood to encourage a spectrum of income levels and unit types close to transit. The goal in this area is to promote housing stability and provide economic opportunity for a diverse population.

City staff continues to build strong community partnerships and recruit vision-aligned affordable

housing developers and funding agencies, including Maiker Housing Partners, Foothills Regional Housing, CRHDC, ULC, Habitat for Humanity, and Enterprise Community Partners, as well as a range of private developers. City staff also currently serve on the boards of Maiker Housing Partners and Habitat for Humanity of Colorado.

### **Actions planned to reduce lead-based paint hazards**

The City has determined that it does not have the staff capacity or funding resources to address the federal Lead-Based Paint requirements. The City's Emergency and Essential Home Repair Program contractors, Foothills Regional Housing and Brothers Redevelopment, Inc. comply with all federal Lead-Based Paint regulations when implementing the program. Additionally, the City's proposed new program offering rehabilitation grants for existing affordable multifamily properties will comply with all lead-based paint regulations, and dependent on specific applications and identified needs, these activities may involve remediation.

### **Actions planned to reduce the number of poverty-level families**

The City is continually working to provide more jobs for residents of all skill levels with Westminster employers through its comprehensive economic development efforts. The City can influence levels of jobs and affordable housing; however, many aspects of combating poverty are outside the City's influence. The City relies on available supportive services agencies and the Adams and Jefferson County Human Services Departments to assist poverty-level families.

Education is also a primary tool in combating poverty. Westminster is fortunate to have both a large community college and several university programs located within its borders or in adjacent areas. The City also has close ties with the three school districts that are continually working to increase educational achievement levels and high school graduation rates.

### **Actions planned to develop institutional structure**

Efforts to develop institutional structure have focused on addressing the growing needs of persons experiencing homelessness, those with severe cost burden, and those who have special needs. Westminster has a strong relationship with the non-profit organizations and public housing authorities that serve the City's low-income residents and most vulnerable populations.

### **Actions planned to enhance coordination between public and private housing and social**



## **service agencies**

Please see above.

## **Discussion**

Other actions the City takes to meet the needs of underserved and vulnerable populations include:

- Administrative approval of domestic violence shelters in order to protect the confidentiality of the location of shelters to protect victims from further assaults. These include: Alternatives to Family Violence; The Rape Assistance and Awareness Program (RAAP); and Sexual Assault Nurse Examiners (SANE).
- Assigning two City staff to serve on regional projects to address services and options for unhoused residents.
- Providing motel vouchers on below freezing nights to ensure unhoused individuals and families are able to be indoors and have access to a safe and clean bed.

## Program Specific Requirements

### AP-90 Program Specific Requirements - 91.420, 91.220(I)(1,2,4)

#### Introduction

Projects are eligible for CDBG funding if they meet certain criteria as established by HUD. A project must benefit low- and moderate-income individuals (LMI), low- and moderate-income areas (LMA), address conditions of slum or blight, or meet an urgent community need. Approximately 80 percent of CDBG funds will be used for activities that benefit persons or areas of low- and moderate-income in 2020. Projects will also address a priority community need as outlined in Westminster's 2020-2024 Consolidated Plan.

#### 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
<b>Total Program Income:</b>	<b>0</b>

#### 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.	80.00%

## **Discussion**

Please see above.

## Attachments

## Citizen Participation Comments

### APPENDIX A. CITIZEN PARTICIPATION PLAN

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CITY OF WESTMINSTER

**DRAFT**  
2020  
CITIZEN  
PARTICIPATION  
PLAN

November 2020



**City of Westminster**

**DRAFT Citizen Participation Plan**

Adopted November, 2020

City of Westminster

Economic Development Department

4800 West 92<sup>nd</sup> Ave

Westminster, CO 80031

For more information:

<https://www.westminstereconomicdevelopment.org/housing/cdbg/>

Email: CDBG@cityofwestminster.us

#### **2020 HUD Citizen Participation Requirements Waived During COVID-19 Response**

*COVID-19 Accommodation: The 2020-2024 Consolidated Plan and the Citizen Participation Plan (CPP) were completed during the COVID-19 Pandemic response period.*

*During the fund allocation process and grant set-up, the Secretary of HUD provided waivers from some citizen participation requirements. The waivers allowed for reduced notification to ensure that emergency resources were applied to identified needs in an expedited manner, typically five days for matters pertaining to emergency relief.*

*The City of Westminster will return to the standard CPP-required notice and in-person public meetings when state and county health departments deem it safe. However, some remote-access and on-line meeting practices may carry forward during implementation of the 2020-2024 Consolidated Plan, as reflected in this CPP.*

*Additionally, all 2020 program year reporting dates have shifted for the Community Development Block Grant COVID-19 (CDBG-CV). Please consult with CDBG staff for the expected reporting dates for 2020 and 2021.*

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## Introduction

The City of Westminster (City) became a U.S. Department of Housing and Urban Development (HUD) entitlement jurisdiction in 1994, allowing the City to receive annual grant funding through the federal Community Development Block Grant (CDBG) program. As an entitlement jurisdiction, the City receives CDBG funding directly from HUD and is responsible for administering the annual grant, including the selection of all programming, ensuring the funds are used in accordance with the Code of Federal Regulations (CFR), and making certain that associated plans, reports and certifications are completed on time and accurately.

The goals of the CDBG program are stated below; however, the specific goals for the City of Westminster are defined within the 2020-24 Consolidated Plan.

- To provide decent housing, including assisting homeless persons to obtain affordable housing; preserving existing affordable housing stock; increasing the availability of permanent housing that is affordable to low-income persons without discrimination; and, increasing supportive housing that includes structural features and services to enable persons with special needs to live in dignity.
- To provide a suitable living environment, including improving the safety and livability of neighborhoods; increasing access to quality facilities and services; providing affordable housing opportunities to low-income and moderate-income citizens dispersed throughout the community; revitalizing deteriorating neighborhoods; restoring and preserving natural and physical features of special value for historic, architectural, or aesthetic reasons; and, conserving energy resources.
- To expand economic opportunities, including the creation of jobs accessible to low-income persons; providing access to credit for community development that promotes long-term economic and social viability; and, empowering low-income persons to achieve self-sufficiency in federally assisted and public housing programs.

The City also participates in a regional HOME Investment Partnership Act (HOME) consortium with Adams County. Adams County Community Development leads the consortium, which is governed by an intergovernmental agreement (IGA) between the County, the City and a third partner, the City of Thornton. This consortium gives the City access to a portion of HOME-share funds for use in developing affordable housing and supporting the needs of landlords and residents in Westminster who provide or reside in affordable housing.

Each entitlement jurisdiction must complete a Consolidated Plan at least once every five years (24 CFR § 91.15). The Consolidated Plan is a strategic plan that examines the housing and community development needs of a jurisdiction, sets priorities for HUD grant monies, and establishes an action plan for meeting current and future needs. Each Consolidated Plan is also required to have a strategy for citizen participation in the Consolidated Planning process (24 CFR Part 91.105). The latest edition of the City's Consolidated Plan will be in effect from July, 2020 through June, 2024.

HUD also requires entitlement jurisdictions to submit an Annual Action Plan (AAP) by August of each year to receive their CDBG funding allocation (24 CFR § 91.15). The AAP details the implementation activities for that coming year of the five-year Consolidated Plan. The AAP serves, in part, as the City's application to HUD for the following year's CDBG funding. The AAP includes:

1. Projects the City desires to fund;
2. Funding amounts for each project;
3. Tasks and objectives to accomplish during the program year;
4. Completed public participation process steps;
5. How other resources will be leveraged through the CDBG allocation; and
6. How the City plans to address barriers to affordable housing, fair housing and homelessness.

The City's CDBG program year begins July 1 and ends June 30. At the end of each CDBG program year, the City will produce a Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER reviews the progress the City made in addressing priority goals in the Consolidated Plan and most recent AAP. The CAPER includes a description of the resources applied toward the Consolidated Plan and AAP goals, how those resources were invested, the distribution and location of those investments, target audiences served through the investments, and any findings that may inform changes to the program. (24 CFR § 91.520.) This report must be submitted to HUD within 90 days after City's program year.

The purpose of the Citizen Participation Plan (CPP) is to establish the policies and procedures the City will employ to encourage citizen participation in developing the AAP and, every five years, a new Consolidated Plan. The CPP is subject to notice procedures in order to provide all interested residents access to the City's commitments and processes for CDBG-funded initiatives.

The following CPP is a framework for compliance with Federal citizen participation requirements for CDBG programs. This CPP was developed in accordance with the Federal regulations, which are cited throughout the document.

*Federal regulation states that "Citizen comment on the citizen participation plan and amendments. The jurisdiction must provide citizens with a reasonable opportunity to comment on the original citizen participation plan and on substantial amendments to the citizen participation plan and must make the citizen participation plan public. The citizen participation plan must be in a format accessible to persons with disabilities, upon request." [24 CFR Part 91.105.]*

The City commits to ensure the meaningful participation of its citizens in development of any Consolidated Plan, AAP, CAPER, and any Substantial Amendment to an enacted plan, with particular emphasis on participation by low- and moderate-income residents and neighborhoods.

## 1. Encouragement of Citizen Participation

The City is enriched by a diverse population of citizens who have chosen Westminster as their home. The City's 2017 Affordable and Workforce Housing Strategic Plan states that, "*Westminster residents are not a commodity; they are a community.*" It is this understanding that frames the City's work to ensure that information about the City's CDBG programs and services is accessible and available to all residents.

It is the City's intent to provide access to all aspects of the CDBG and HOME programs to all residents, especially communities and individuals who are eligible to receive and benefit from CDBG and HOME funded programs. Access includes the opportunity to apply for CDBG and HOME funds, to comment on the planned expenditure of those funds in upcoming years, to comment on the City's performance in administering CDBG and HOME funded projects, and to comment on required report drafts, including the Consolidated Plan, the AAP, and CAPER.

*Federal regulation states that "The citizen participation plan must require that, before the jurisdiction adopts a consolidated plan, the jurisdiction will make available to citizens, public agencies, and other interested parties information that includes the amount of assistance the jurisdiction expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income." [91.105(b)(1)]*

As detailed under section 7, Citizen Participation Requirements, the City will emphasize the involvement of moderate, low, very-low, and extremely low-income residents in areas where housing and community development funds may be spent. The City also will encourage the participation of persons with special needs and persons who are often underrepresented in the public process, including minorities, elderly, non-English speaking persons, persons with disabilities, and persons who are homeless. The City also encourages participation of the county public housing authorities and their residents in development of the Consolidated Plan. Finally, the City will inform and offer opportunities for comment to all residents falling within the scope of the Consolidated Plan.

The City will make reasonable efforts in its public participation activities to consult with other public, non-profit, and private agencies that provide housing assistance, health services, and various social services, including those focusing on services to children, elderly persons, and persons with disabilities. The City also will encourage the participation of other local and regional institutions, including businesses, internet service providers, real estate developers, schools, churches, and community and faith-based organizations. Further, the City will consult with other general offices of government, including Adams and Jefferson Counties, surrounding jurisdictions, and the Colorado Division of Housing (CDOH) to notify them of the plan process and to solicit their input.

## 2. Assessment of Fair Housing

The Fair Housing Act of 1968 requires jurisdictions receiving federal funds for housing and urban development to affirmatively further fair housing. Under the Fair Housing Act, it is not only unlawful for jurisdictions to discriminate, they also are required to take actions to undo historic patterns of

segregation and other types of discrimination, as well as to promote fair housing choice and to foster inclusive communities. The plan for complying with these Fair Housing Act standards is an Assessment of Fair Housing (AFH).

Local jurisdictions receiving more than \$500,000 a year in Community Development Block Grant (CDBG) funds were originally required to submit their first AFH plan 270 days before their program year, for any program year beginning on or after January 1, 2017 for which a new Consolidated Plan was due. The Federal regulations guiding this fair housing requirement were suspended in 2018 and recent guidance indicates that CDBG jurisdictions will need to adopt and submit their AFH plans by 2025.

To inform AFH needs, and per federal guidance, the City participates in the Adams County analysis of impediments (AI) to fair housing choice. Under federal law, the City is obligated to align actions in the Consolidated Plan to overcome identified impediments to fair housing choice and to keep records of those actions along with analysis of their effectiveness.

### **3. Anti-Displacement Plan**

#### **Residential Anti-Displacement and Relocation Assistance**

The City is supportive of the right of residents to remain in housing they personally chose and will avoid displacement whenever possible. When the application of federal funding leads to unavoidable displacement and relocation is unavoidable, the City will proceed in the following manner:

In connection with any project assisted with funds provided under CDBG and/or HOME, the City will replace all habitable lower income housing, whether occupied or vacant, that is demolished or converted to a use other than as lower income housing. All replacement housing will be provided within three years after commencement of the demolition or conversion.

Before entering into a contract committing the City to provide funds for a project that will directly result in the demolition or conversion of lower income housing, the City will provide public notice of the action by publication of a Legal Notice in the City newspaper of record, posting notice on the CDBG webpage and will submit to HUD the following information in writing:

1. A description of the proposed assisted project;
2. The address, number of bedrooms, and location on a map of the housing that will be demolished or converted to a use other than as lower income housing as a result of an assisted project;
3. A time schedule for the commencement and completion of the demolition or conversion;
4. To the extent shown, the address, number of bedrooms and location on a map of the replacement housing that has been or will be provided;
5. The source of funding and a time schedule for the provision of the replacement housing;
6. The basis for concluding that the replacement housing will remain lower income housing for at least 10 years from the date of initial occupancy; and,
7. Information demonstrating that any proposed replacement of housing units with smaller dwelling units (e.g. two-bedroom unit replaced with two one-bedroom units), or any proposed replacement of efficiency or single room occupancy (SRO) units with units of a different size, is

appropriate and consistent with the housing needs and priorities identified in the approved Consolidated Plan.

To the extent that the specific location of the replacement housing and other data in items 4 through 7 are not available at the time of the general submission, the City will identify the general location of such housing on a map and complete the disclosure and submission requirements as soon as the specific data is available.

The City's Department of Economic Development (Economic Development) is responsible for tracking the replacements of lower income housing and insuring that it is provided within the required period. Economic Development is responsible for providing relocation payments and other relocation assistance to any lower income person displaced by the demolition of any housing or the conversion of lower income housing to another use.

Consistent with the goals and objectives of required activities under the Uniform Relocation Assistance and Real Property Acquisition Act, the City will take the following steps to minimize the direct and indirect displacement of persons from their homes:

1. Coordinate code enforcement with rehabilitation and housing assistance programs;
2. Stage rehabilitation of apartment units to allow tenants to remain in the building/complex during and after the rehabilitation, working with empty units first;
3. Arrange for facilities to house persons who must be relocated temporarily during rehabilitation;
4. Identify and mitigate displacement resulting from intensive public investment in neighborhoods; and/or
5. Establish counseling centers to provide homeowners and tenants with information on assistance available to help them remain in their neighborhoods in the face of revitalization pressure.

The City reserves the right to refuse to engage in any activity that may trigger the relocation of resident if it is determined that such activity is not in the best interest of the City.

#### **4. Public Notice and Outreach**

All opportunities to engage and participate in the development of CDBG programming and to advise on proposed projects begin with public notice to the City's residents and partners. The City will employ multiple platforms to publish notice of CDBG program activities requiring public participation.

Public notice of community meetings and public hearings to review proposed CDBG projects and activities shall be published on the City's CDBG webpage:

<https://www.westminstereconomicdevelopment.org/housing/cdbg/>

Public Notice shall be published for no less than two weeks (14 days) prior to any meeting or hearing. Specific notice periods for each of the planning processes are detailed below under Citizen Participation Requirements.



**Notice and Posting at City Buildings and PHA Residences:**

The closure of many public facilities during the COVID-19 pandemic made public fliers and posting impossible during much of 2020. In light of this development, the City will employ outreach plans that use web posting, email and social media to publicly notice project information and updates.

As some of the City land use procedures call for distribution of notice to properties within 300 feet of specific projects, the City will also employ direct mail for land use changes and decisions.

**City Resident Request for Notice:**

City staff is initiating an email subscription process for residents and community partners on the CDBG page on the City's website at <https://www.westminstereconomicdevelopment.org/housing/cdbg/>. This email distribution subscription process will allow the City to efficiently share information with local interests and allow users to subscribe and unsubscribe at any time.

**Input on Plans and Projects:**

Written comment and questions can be delivered to the City at: [CDBG@Cityofwestminster.us](mailto:CDBG@Cityofwestminster.us).

Additionally, residents may send input via the U.S. mail to:

CDBG Program, Economic Development Department  
City of Westminster  
4800 West 92<sup>nd</sup> Avenue  
Westminster CO 80031

**5. Public Meetings and Input Opportunities**

*The Federal regulation states that "The jurisdiction should explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods, and the review of program performance; e.g., use of focus groups and the Internet." [91.105(a)(2)(iv)].*

In recent years, the City has experienced increased participation by residents through online channels. During the information gathering process for the 2020-2024 Consolidated Plan, hundreds of residents participated via online surveys and focus groups. Though this access has helped more families and working residents participate in the review of City projects during times that were convenient for their schedules, the City recognizes that many residents still do not have easy and reliable internet access. For this reason, the City will maintain opportunities for in-person public input sessions for CDBG activities and will provide notice of those input sessions through traditional published media.

The City regularly engages with residents and partnering agencies to gather input on:

- Housing and community development needs;
- Development of proposed activities;

- Review of proposed uses of funds; and,
- Review of program performance.

The activities and techniques employed to encourage citizen participation in reviewing proposals and plans include:

- Community meetings, both in person and through videoconference;
- Surveys;
- Webinars; and,
- Public hearings.

All residents are invited to provide input via email at CDBG@cityofwestminster.us, and/or on the City's CDBG website. All comments will be accepted. Staff will provide written response to the comments they receive and provide a summary of comments and responses in the Citizen Participation section of any plan or report that is under review.

## **6. Commitment to Access by All**

Staff from multiple City departments work daily to ensure that City services and CDBG-funded programs are accessible and available to all City residents. The City has established a Language Access Plan (LAP) and strategic organization outreach efforts to guide how our staff works to hear and learn from the identified populations for whom our community programs are intended to serve. Staff expects that the LAP will be accepted by City Council in early 2021.

The City will provide accommodations for non-English speaking/Limited English Proficiency (LEP) citizens for public meetings or hearings where a significant number of non-English speaking/LEP residents can reasonably be expected to participate. Details on these accommodations are available in the City's LAP.

The City also will provide accommodations for hearing-impaired and sight-impaired citizens for community meetings or public hearings where a significant number of residents can reasonably expect to participate. Westminster residents must request needed adaptations at least three days prior to the meetings or hearings in order for the City to make accommodation arrangements. Please contact City staff in advance if you need these services, or if you need written documents in a format accessible to persons with disabilities. For hearing or speech impaired residents, please use 711 for the Colorado Relay 2 Number. The City will provide on-line documents in a format that is compatible with web readers who are visually impaired.

## **7. Citizen Participation Requirements**

*Federal regulation states that "The citizen participation plan must provide that the consolidated plan as adopted, consolidated plan substantial amendments, HUD-accepted AFH, revisions to the AFH, and the performance report will be available to the public, including the availability of materials in a form accessible to persons with disabilities, upon request. The citizen participation plan must state how these documents will be available to the public." [91.105(g)]*

The following activities have been identified to both comply with federal regulations and to provide comprehensive opportunities for residents to learn about and provide input to the City's CDBG investments.

***a. Consolidated Plan and Annual Action Plan (AAP)***

The proposed AAP will be reviewed at a minimum of two public meetings that are at convenient times and locations for the public to attend. In-person meetings may occur at City-owned public use facilities, or at other agency-owned housing developments, such as the Maiker Housing Partners properties. All meeting locations shall be fully accessible and accommodate any identified participant translation needs. The City may include a focus group with low- and moderate-income and/or public housing residents as one of the community meetings.

At least one public hearing must be held before a proposed Consolidated Plan and the AAP is accepted by City Council for submission to HUD. The public hearing shall be either held at the City of Westminster Council Chambers, 4800 W. 92nd Avenue, Westminster, Colorado 80031 or conducted virtually.

Public hearings will be noticed for a minimum of 14 days. Notice will be posted on the City's CDBG website and communicated via email and social media. The City will receive written comment in advance of public hearings and will be considered and included in the City Council agenda materials. Residents also will have the opportunity to comment on the proposed plan during the public hearings.

All input received will be accepted and will be addressed and included in the plan Citizen Input attachments.

***b. Amendments to Consolidated Plan, Action Plan and Citizen Participation Plan***

The City may be required to amend the City's Consolidated Plan and/or AAP in order to address changes to programs or unforeseen circumstances. A minor amendment may involve a change of anticipated completion dates, a new project set-up or changes to activities included in a project. Minor amendments may be filed for acceptance by HUD at any time during the program year and will be captured in notes to the City's Consolidated Plan or AAP. The purpose of performing a minor amendment is to ensure that project tracking and reporting on activities the City takes are articulated in the jurisdiction's CAPER.

The City defines a substantial amendment as a change to a defined project's budget of more than \$75,000.00, a project cancellation, or re-assignment of project funds in excess of \$75,000.00 to a new project that was not established in either the Consolidated Plan or AAP. A substantial amendment requires public notice and the opportunity for residents to review and comment on the change.

*Federal regulation states that "The citizen participation plan shall require the jurisdiction to consider any comments or views of citizens received in writing, or orally at public*



*hearings, if any, in preparing the substantial amendment of the consolidated plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefor, shall be attached to the substantial amendment of the consolidated plan.” [91.105(c)(3)].*

The public will be notified in the event of a substantial amendment to any of the filed plans identified above. Notice will be posted on the City’s CDBG website and communicated via email and social media.

- Comments shall be received from citizens for a period of not less than 30 days.
- A Public Notice shall be posted on the City’s CDBG website:  
<https://www.westminstereconomicdevelopment.org/housing/cdbg/>
- The City Council shall consider the amendment in an open session for budgetary or line item alterations of more than \$75,000 for changes from one activity to another, such as a project cancellation and a new project approval of \$75,000 or more.
- All input received will be accepted and will be addressed and included in the amended plan’s attachments.

The requirements outlined for the CPP shall be addressed during the public meetings and the public hearing for either the Consolidated Plan or an AAP. The adopted CPP shall be incorporated into and publicized along with the appropriate Consolidated Plan and AAP. The CPP may also be amended during the Consolidated Planning period.

**c. Consolidated Annual Performance Evaluative Report (CAPER)**

The CAPER is the report of accomplishments under the Consolidated Plan and AAP during the previous year and details the expenditures to achieve program goals. The City is required to file a CAPER 90 days after the close of the CDBG program year.

*Federal regulation states that “The citizen participation plan shall require the jurisdiction to consider any comments or views of citizens received in writing, or orally at public hearings in preparing the performance report. A summary of these comments or views shall be attached to the performance report.” [91.105(d)(2)].*

The text of the draft and the final CAPER shall be posted on the City’s CDBG website. Notice of the opportunity to review and comment on the CAPER will be posted on the City’s CDBG website and communicated via email and social media.

- Comments shall be received from citizens for a period of not less than 15 days before submitting the CAPER to HUD.
- The CAPER is available for review at the CDBG website at:  
<https://www.westminstereconomicdevelopment.org/housing/cdbg/>
- A print version of the CAPER may also be accessed and read at City Hall or at one of the City libraries.

- The entire CAPER, including the text and all IDIS data printouts, shall be available upon special request for an additional cost to be determined based upon the number of copies requested.

#### **8. Access to Records**

All current and historic CDBG program records are located at the City Hall and may be requested by email and/or accessed on-site by appointment. Records that are more than two years old or which have been transferred to electronic media may require added research and location time. Requests for information that require significant research time and/or access to voluminous content can be provided through a Colorado Open Records Act (CORA) request.

#### **9. Technical Assistance to Citizens and Organizations**

The City will provide reasonable technical assistance to moderate, low, very low, and extremely low income groups located in the geographic scope of the Consolidated Plan who request assistance in developing project proposals for CDBG supported programs.

#### **10. Complaints and Appeal Process**

The City will consider any comments or views of citizens, units of general local government, agencies, or other interested parties. Concerns and complaints can be delivered via email to [CDBG@Cityofwestminster.us](mailto:CDBG@Cityofwestminster.us). Written response to complaints and grievances submitted via email or U.S. mail will be provided within 21 days where practical.

## APPENDIX B. CITY COUNCIL PRESENTATIONS AND PUBLIC HEARING

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## 2020-2024 Consolidated Plan

- U.S. Department of Housing and Urban Development (HUD) requires the completion of a Consolidated Plan every five years
  - Identify the City's housing and community development needs, priorities, and goals
  - Based on community input, economic data, and past CDBG investments
- Required to complete Annual Action Plan (AAP) to determine funding allocation to housing and community development activities for each program year
- Eligible project activities **may** include:
  - Affordable housing activities
  - Certain public facility and infrastructure improvements
  - Economic development/redevelopment



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## HUD National Objectives

HUD's three **national objectives** include:

1. **Benefit to low- and moderate- income (LMI) persons**
  1. Directly support affordable housing
  2. Used in a target area with a resident population that is more than 50% LMI
2. **Aid in the prevention or elimination of slums or blight**
3. **Meet a need having particular urgency**



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## 2015-2019 Consolidated Plan

### Projects Completed

CDBG funds were used during the previous five-year Consolidated Plan for the following projects/programs:

- **Needs Addressed: Housing**
  - Emergency and Essential Home Repair grants to support 90 qualifying grantees
  - Paid off Section 108 Loan
- **Needs Addressed: Public Facilities and Infrastructure**
  - Oakwood Drive Pedestrian Improvements
  - Bradburn Boulevard Street Enhancement
  - Fireman's Park Pedestrian Improvements
  - Bradburn Boulevard Decorative Lighting
  - Design of Pedestrian Safety and Streetscape Improvements for Hooker Street

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## 2020-2024 Consolidated Plan

### Components

As a participant in the Adams County HOME Investments Partnership Program (HOME) Consortium, the Consolidated Plan includes county and regional data.

**Consolidated Plan includes:**

- ES: Executive Summary of the Plan
- PR: Overview of process and responsible parties
- NA: Needs Assessment
- MA: Housing Market Analysis
- SP: Strategic Plan
- AP: Annual Action Plan
- CPP: Citizen Participation Plan

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6

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## 2020-2024 Consolidated Plan

### Citizen Participation

The 2020-2024 Consolidated Plan is informed by citizen input gathered between Q3 2019 and today

- 297 Westminster resident survey responses
- 401 participants at community events
- 13 bilingual focus group participants with Maiker and Growing Home
- Presentation to Inclusivity Board
- Engaged with local service providers
- Outreach to Spanish speaking residents

#### Westminster Survey Responses

- 101 had visited Westminster
- 84 had a household member with a disability
- 51 know someone who
- 51 know how to ask for help
- 35 know about
- 25 are single parents or a lone adult (11 total)
- 20 are financially stressed
- 20 are single parents living with other adults (10 total)
- 14 are not comfortable with


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## 2020-2024 Consolidated Plan

### Goals and 2020 AAP Projects

- **Goal 1 - Preserve and Expand Affordable Housing**
  - Emergency and Essential Home Repair
  - Affordable Housing Site Improvements
  - Affordable Housing Preservation
- **Goal 2 - Infrastructure and Streetscape Improvements**
  - Pedestrian Safety and Streetscape Improvements for Hooker Street


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<b>2020-2024 Consolidated Plan</b>	
<b>2020 AAP Budget</b>	
2020 CDBG Allocation	\$ 631,903
Prior Year Resources	\$ 798,283
<b>2020 Annual Action Plan Budget</b>	<b>\$1,430,186</b>
<b>CDBG Administration (20%)</b>	<b>\$126,380</b>
<b>Goal 1 - Preserve and Expand Affordable Housing</b>	<b>\$780,000</b>
Emergency and Essential Home Repair	\$ 40,000
Affordable Housing Site Improvements	\$250,000
Affordable Housing Preservation	\$490,000
<b>Goal 2 - Infrastructure and Streetscape Improvements</b>	<b>\$523,806</b>
Hooker Street Pedestrian Safety and Streetscape Improvements	<u>\$523,806</u>
<b>Total</b>	<b>\$1,430,186</b>
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<b>2020-2024 Consolidated Plan</b>	
<b>Next Steps</b>	
<ul style="list-style-type: none"> <li>• <b>October 13 – November 12:</b> Draft Consolidated Plan will be posted for a 30-day public comment period <ul style="list-style-type: none"> <li>• Posted on City CDBG website</li> <li>• Comments may be provided by email or phone</li> <li>• All input received will be accepted and tracked in the final Consolidated Plan</li> </ul> </li> <li>• <b>November 23:</b> Return to City Council for public hearing and to seek approval of the Consolidated Plan <ul style="list-style-type: none"> <li>• Public may participate in the live meeting</li> <li>• Meeting will be accessible in Spanish by phone</li> <li>• All input will be addressed and included in the final Consolidated Plan</li> </ul> </li> </ul>	
 WESTMINSTER	
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**Appendix**  
Westminster 2020 CDBG Income Limits

AREA	% AMI LEVEL	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
Denver, CO MSA (Adams-JeffCo)	30	\$21,000	\$24,000	\$27,000	\$30,000	\$32,400	\$34,800	\$37,200	\$39,600
	50	\$35,000	\$40,000	\$45,000	\$50,000	\$54,000	\$58,000	\$62,000	\$66,000
	60	\$42,000	\$48,000	\$54,000	\$60,000	\$64,800	\$69,600	\$74,400	\$79,200
	80	\$54,950	\$62,800	\$70,650	\$78,500	\$84,800	\$91,100	\$97,350	\$103,650
	100	\$70,000	\$80,000	\$90,000	\$100,000	\$108,000	\$116,000	\$124,000	\$132,000
AMI: \$100,000	120	\$84,000	\$96,000	\$108,000	\$120,000	\$129,600	\$139,200	\$148,800	\$158,400

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## 2020-2024 Consolidated Plan

- U.S. Department of Housing and Urban Development (HUD) requires the completion of a Consolidated Plan every five years
  - Identify the City's housing and community development needs, priorities, and goals
  - Based on community input, economic data, and past CDBG investments
- Required to complete Annual Action Plan (AAP) to determine funding allocation to housing and community development activities for each program year
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  - Affordable housing activities
  - Certain public facility and infrastructure improvements
  - Economic development/redevelopment



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## HUD National Objectives

HUD's three **national objectives** include:

1. **Benefit to low- and moderate- income (LMI) persons**
  - Directly support affordable housing
  - Used in a target area with a resident population that is more than 50% LMI
2. **Aid in the prevention or elimination of slums or blight**
3. **Meet a need having particular urgency**



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### 2015-2019 Consolidated Plan

#### Projects Completed

CDBG funds were used during the previous five-year Consolidated Plan for the following projects/programs:

- **Needs Addressed: Housing**
  - Emergency and Essential Home Repair grants to support 90 qualifying grantees
  - Paid off Section 108 Loan
- **Needs Addressed: Public Facilities and Infrastructure**
  - Oakwood Drive Pedestrian Improvements
  - Bradburn Boulevard Street Enhancement
  - Fireman's Park Pedestrian Improvements
  - Bradburn Boulevard Decorative Lighting
  - Design of Pedestrian Safety and Streetscape Improvements for Hooker Street

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### 2020-2024 Consolidated Plan

#### Citizen Participation

The 2020-2024 Consolidated Plan is informed by citizen input gathered between Q3 2019 and today

- 297 Westminster resident survey responses
- 401 participants at community events
- 13 bilingual focus group participants with Maiker and Growing Home
- Presentation to Inclusivity Board
- Engaged with local service providers
- Outreach to Spanish speaking residents

#### Westminster Survey Responses

	101 total adult residents
	64 total household members with a disability
	51 under age 20
	57 live in any adult family household
	36 the alone
	25 are single parents or other adult householders
	20 are single parents living with other adult family householders
	14 live in rooming situations

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## 2020-2024 Consolidated Plan

### Citizen Participation

- October 12, 2020 City Council presentation
- Draft Consolidated Plan posted on City's CDBG website for 30-day review
- Social media blasts from October 15, 2020 to November 20, 2020
- Coordination with non-profit partners for their publication
- Staff met with Maiker Resident Board and Growing Home volunteers
- Mailing (both hard copy and email) for two-week notice of Public Hearing



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## 2020-2024 Consolidated Plan

### Goals and 2020 AAP Projects

- **Goal 1 - Preserve and Expand Affordable Housing**
  - Emergency and Essential Home Repair
  - Affordable Housing Site Improvements
  - Affordable Housing Preservation
- **Goal 2 - Infrastructure and Streetscape Improvements**
  - Pedestrian Safety and Streetscape Improvements for Hooker Street

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<b>2020-2024 Consolidated Plan</b>	
<b>2020 AAP Budget</b>	
2020 CDBG Allocation	\$ 631,806
Prior Year Resources	\$ 852,716
<b>2020 Annual Action Plan Budget</b>	<b>\$1,484,522</b>
<b>CDBG Administration (20%)</b>	<b>\$126,361</b>
<b>Goal 1 - Preserve and Expand Affordable Housing</b>	<b>\$780,000</b>
Emergency and Essential Home Repair	\$ 40,000
Affordable Housing Site Improvements	\$250,000
Affordable Housing Preservation	\$490,000
<b>Goal 2 - Infrastructure and Streetscape Improvements</b>	<b>\$578,161</b>
Hooker Street Pedestrian Safety and Streetscape Improvements	<u>\$578,161</u>
<b>Total</b>	<b>\$1,484,522</b>
 WESTMINSTER	
9/19	


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<b>2020-2024 Consolidated Plan</b>	
<b>Next Steps</b>	
<ul style="list-style-type: none"> <li>▪ <b>November 23:</b> Public Hearing and request for approval of the Consolidated Plan</li> <li>▪ <b>November 24 – December 14:</b> Staff incorporates additional input received for the Consolidated Plan</li> <li>▪ <b>December 14:</b> Second Reading of Supplemental Appropriation Ordinance</li> <li>▪ <b>December 15 – 20:</b> Complete and file the Consolidated Plan and City certifications through the Adams County consortium submittal process</li> </ul>	
 WESTMINSTER	
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**Appendix**  
Westminster 2020 CDBG Income Limits

AREA	% AMI LEVEL	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
Denver, CO MSA (Adams-JeffCo)	30	\$21,000	\$24,000	\$27,000	\$30,000	\$32,400	\$34,800	\$37,200	\$39,600
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	80	\$54,950	\$62,800	\$70,650	\$78,500	\$84,800	\$91,100	\$97,350	\$103,650
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AMI: \$100,000	120	\$84,000	\$96,000	\$108,000	\$120,000	\$129,600	\$139,200	\$148,800	\$158,400

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Agenda Item - 10.A.

## Agenda Memorandum

City Council Meeting  
November 23, 2020



*Visionary Leadership, Effective Governance and Proactive Regional Collaboration*



*Vibrant, Inclusive and Engaged Community*



*Dynamic, Diverse Economy*



*Financially Sustainable Government Providing Excellence in City Services*

**Subject:** Public Hearing on the 2020-24 Community Development Block Grant Consolidated Plan and First Reading of Councilor's Bill No. 34 Re: Supplemental Appropriation of Community Development Block Grant Funds

**Prepared By:** Chase Evans, Real Estate and Development Administrator  
Molly Tayer, Housing Coordinator  
Tom Anderson, Redevelopment Coordinator  
Jenni Grafton, Economic Policy and Development Manager

### Recommended City Council Action:

1. Hold a public meeting on the 2020-24 Community Development Block Grant Consolidated Plan and receive public comments.
  - The public may participate in this virtual Public Hearing in one of three ways:
    - Email your written testimony by 12:00 p.m. (noon) the day of the meeting to: [PublicHearing\\_Item10A@cityofwestminster.us](mailto:PublicHearing_Item10A@cityofwestminster.us);
    - Leave a recorded message to be played during the Public Hearing by calling (303) 706-3111 by 12:00 p.m. (noon) the day of the meeting; or
    - Join the virtual sign-up list to give live testimony during the Public Hearing by emailing the City Clerk's Office at [cityclerk@cityofwestminster.us](mailto:cityclerk@cityofwestminster.us) by 12:00 p.m. (noon) the day of the meeting.
2. Approve the allocation of Community Development Block Grant funds as set forth in this agenda memorandum for the 2020 program year and authorize Staff to submit the 2020-24 Community Development Block Grant Consolidated Plan to the U.S Department of Housing and Urban Development.
3. Pass Councilor's Bill No. 34 on first reading, providing for a supplemental appropriation of funds to the 2020 Budget of the Community Development Block Grant Fund.

### Summary Statement:

- The City is a federal entitlement jurisdiction that receives an annual allocation of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). The funds must be used for programs and projects benefitting low- and moderate-income populations and areas.



- HUD requires entitlement jurisdictions to produce a Consolidated Plan to set program goals that guide CDBG investments for a five-year planning period. Each Annual Action Plan (AAP) during that period must be presented to City Council for approval and appropriation of funds.
- The 2020-24 Consolidated Plan goals were based on priorities and needs identified through community feedback. The proposed goals, projects, and activities were chosen based on feasibility, alignment with broader strategic goals, and availability of supportive resources to ensure timely expenditure of funds and compliance with HUD regulations.
- Staff posted the draft 2020-24 Consolidated Plan (Attachment A) for a 30-day public review period beginning October 13, 2020. As of the drafting of this Agenda Memorandum, one public comment had been received and has been included as Attachment C. Additional public comments received up to and during the public hearing will be accepted.
- The City's 2020 CDBG allocation is \$631,806. Additionally, \$852,716 of past CDBG allocations and repaid funding will be reprogrammed within the 2020 AAP. In total, the amount to allocate for the 2020 program year is \$1,484,522.
- The proposed 2020 CDBG budget reflects the 2020-24 Consolidated Plan goals.
- Once approved, the final 2020-24 Consolidated Plan will be submitted to HUD for acceptance and will guide CDBG expenditures for the next five program years.

**Fiscal Impact:**

\$631,806 - 2020 CDBG allocation  
\$852,716 - carryover

**Source of Funds:**

CDBG Program

**Policy Issue(s):**

Should City Council approve the 2020-24 Consolidated Plan and allocate the CDBG funds to the proposed projects as recommended for the 2020 program year?

**Alternative(s):**

Do Not Proceed - City Council could choose not to accept the 2020-24 Consolidated Plan or appropriate the 2020 funds. Staff does not recommend this alternative because the CDBG funding can be used to benefit the community by preserving and expanding affordable housing and providing infrastructure and streetscape improvements. If the Consolidated Plan, which includes the 2020 AAP, is not approved, the City will forfeit its acceptance of funds, and its 2020 CDBG allocation will be returned to HUD.

Proceed with Different Allocation - Within the proposed 2020 appropriation, City Council could choose to allocate the funding to different projects or in different amounts. Staff does not recommend this alternative as the proposed projects are based on community input and identified needs. Additionally, the proposed projects and funding amounts were chosen based on feasibility, alignment with broader strategic goals, and availability of supportive resources to ensure timely expenditure of funds and compliance with HUD regulations.

Proceed as Proposed - City Council could choose to proceed with the recommendations as presented by approving the appropriation of CDBG funding as proposed for the 2020 program year and authorizing Staff to submit the 2020-24 Consolidated Plan to HUD.

**Background Information:**

The CDBG program provides annual grants to states, cities, and counties based on a formula that factors in population size and economic metrics with the goal of developing viable communities through the provision of housing, a decent living environment, and expanding economic opportunities for low- and moderate-income individuals. As an entitlement community that receives CDBG funds directly from HUD, the City is responsible for developing a Consolidated Plan document as a framework for a community-informed mechanism to identify housing needs and community development priorities that inform the utilization of HUD funding. A new Consolidated Plan must be established every five years, and it serves as the organizing structure for annual allocations that fall within the planning period.

During the previous two Consolidated Plan periods, the City used CDBG funds on large-scale, often multi-year phased projects, which has proven problematic. Given the complexity of multi-year projects and the restrictions placed on the development of land acquired with federal funds, Staff is recommending projects in the 2020-24 Consolidated Plan that will support existing community programs and partners, as well as fund discrete activities that can be completed on a two-year or less timeframe.

Preparing the 2020-24 Consolidated Plan

Staff engaged consultant Root Policy Research (Root) to conduct the research and data analysis that demonstrates current conditions and identifies gaps in service. Root has substantial experience with HUD processes and documentation, as well as an established relationship with the City and regional partners. This expertise and knowledge of surrounding context provided additional insight and strategies for

increased impact. Under the contract for professional services, Root completed a Housing Needs Assessment (HNA) and worked with Staff to develop the Consolidated Plan.

Staff worked with Root on consulting with community partners, non-profit agencies, and residents to identify needs and vet those which could be addressed with CDBG funds. The proposed goals, projects, and activities were chosen based on feasibility, alignment with broader strategic goals, and availability of supportive resources to ensure timely expenditure of funds and compliance with HUD regulations.

#### Opportunity for Community Input and Engagement

Community engagement efforts to inform the 2020-2024 Consolidated Plan began in late 2019 with a survey and community focus groups conducted by Root. This input informed the updated HNA and helped identify potential priorities for CDBG investments. In 2020, Staff and the consultant reviewed findings and preliminary recommendations with community partners and others engaged in related efforts and community planning activities prior to development of the Consolidated Plan.

Staff posted the draft Consolidated Plan for review on the City's CDBG webpage on October 13, 2020, and notified residents and community partners by email and social media of the opportunity to provide input to the plan. Subsequently, Staff sent letters and email on November 6, 2020, to notify the public of the opportunity to provide input and comments during the public hearing to be held on November 23, 2020. All input received before and during the public hearing will be documented and included in the Citizen Participation section of the Consolidated Plan.

In accordance with the current CDBG Citizen Participation Plan, all public hearings are noticed to the public for at least 14 days prior to the meeting date. Notices are provided in both English and Spanish, and interpretation services are provided if requested.

#### Consolidated Plan Structure

The plan is organized under a hierarchy with broad goals articulated first to guide overall direction. These were developed in collaboration with neighboring Adams County jurisdictions and reflect regional priorities. Staff identified two goals to guide proposed projects and investments for the 2020-24 planning period:

- Preserve and Expand Affordable Housing
- Infrastructure and Streetscape Improvements

The goals address HUD national objectives to benefit low- and moderate-income individuals and provide an area benefit to low- and moderate-income neighborhoods. At the next level of planning, projects are identified to support the goals over the course of the five-year plan period. Projects are targeted to specific needs such as homeowner repairs, maintaining affordable housing stock, and replacement of aging infrastructure. Lastly, specific activities are developed within the project categories based on the annual allocation and documented as the AAP. The activities may be tied to discrete locations or partner organizations and are limited in scope so they can be completed in a timely manner.

Because the 2020-24 Consolidated Plan also includes the 2020 AAP, the amounts provided below are limited to the 2020 annual appropriation. However, they reflect the proposed direction for programming over the five-year plan period. In program years 2021-24, Staff will present the respective AAP and recommended funding levels to City Council for approval.

#### 2020 AAP

The City was allocated \$631,806 for the 2020 program year, which runs from July 1, 2020, through June 30, 2021. Due to COVID-19, all CDBG entitlement communities were provided with extensions for filing plans to ensure coordination at multiple levels. Because the City also receives HUD funds for the HOME Investments Partnership Program (HOME) as part of a consortium with Adams County, the City schedule has been coordinated with Adams County's Consolidated Plan acceptance schedule.

In addition to the annual appropriation, there will be a balance of \$852,716 of unallocated funds following the City's repayment to HUD for cancelled projects. This brings the total funding available for the 2020 AAP to \$1,484,522. Staff proposes the following projects and activities in the first year of the five-year consolidated planning period:

- Administration - \$126,361

HUD allows grantees to utilize up to 20 percent of the annual allocation for administration and planning expenses. Currently, program administration funds pay the salary of one full-time CDBG Technician, as well as consultant services, program and compliance training, community outreach activities, and translation services. Any unspent program administration funds may be returned to the fund balance at the end of the program year to be reallocated to future projects.

- Preserve and Expand Affordable Housing - \$780,000
  - Emergency and Essential Home Repair - \$40,000
  - Affordable Housing Site Improvements - \$250,000
  - Multi-family Affordable Housing Rehabilitation and Preservation - \$490,000

The Emergency and Essential Home Repair (EEHR) program helps qualified, low-income homeowners make urgently needed repairs to their homes that improve safety and mobility. This is an important strategy in the preservation of affordable housing because it allows homeowners to remain in their current homes safely rather than experience displacement. Through the program, up to \$5,000 in eligible minor and emergency home repairs can be made free of charge to income-qualified households in Westminster. The program is administered by two partner agencies: Foothills Regional Housing and Brothers Redevelopment, Inc. This ongoing program is promoted through the City's website, print and social media, and referrals. Beginning in December 2020, the EEHR program will be further promoted through the inclusion of program information with the December utility bills. Staff recommends the EEHR program be funded at a lower amount this year, compared to previous years, as the EEHR program has an existing balance of approximately \$200,000 from carryover of previous years.

The Affordable Housing Site Improvements project will provide direct investment in site improvements for the development of qualified new affordable housing that serves residents earning up to 80% of the area median income (AMI). Eligible expenses include sidewalks and streetscape elements, as well as other limited site improvements that are separate from the building construction, which is not eligible for CDBG funding. This project is designed to reduce financial gaps and encourage the development of new affordable housing units.

The Multi-family Affordable Housing Rehabilitation and Preservation project will provide grants to qualifying property owners for properties that currently serve low- and moderate-income residents and meet HUD criteria. This investment is targeted for maintaining the City's aging affordable housing stock that is in need of repairs and updates to ensure the continued availability of these units. Restrictions are placed, generally in the form of a Land Use Restriction Agreement (LURA), to ensure affordability is maintained for an established period of time.

- Infrastructure and Streetscape Improvements - \$578,161

The Infrastructure and Streetscape Improvements project expands upon work done in previous Consolidated Plans to address items such as sidewalks and street lighting to promote greater pedestrian access, improve safety, and remove barriers for special needs populations. Funds from the 2019 appropriation were utilized for the design of streetscape improvements on Hooker Street between West 72nd Avenue and West 71st Avenue. Funds from the 2020 appropriation would go toward the reconstruction and widening of the existing sidewalk and installation of solar powered lights to increase safety and access to public transit. Similar improvements are anticipated to support revitalization efforts in this qualified census tract that covers the Westminster Station neighborhood.

#### Acceptance of the 2020-24 Consolidated Plan

Upon City Council's approval, the Consolidated Plan will be submitted to HUD by the consortium lead, Adams County, in mid-December. Once received and accepted by HUD, the 2020 CDBG allocation will be released to the City and appropriated to the CDBG fund for programming and expenditure.

The 2020-24 Consolidated Plan represents a comprehensive planning effort that supports several of the City's Strategic Plan goals. The research-based strategies and regional collaboration to leverage resources for greater impact reflect Visionary Leadership, Effective Governance and Proactive Regional Collaboration. The CDBG program focuses on low- and moderate-income individuals, as well as neighborhoods, and furthers a Vibrant, Inclusive and Engaged Community, as well as a Dynamic, Diverse Economy, by addressing issues of economic disparity. Lastly, the integration of federal entitlement funds into the City's planning and budgeting processes to accomplish strategic objectives demonstrates the goal of being a Financially Sustainable Government Providing Excellence in City Services.

Respectfully submitted,

*Donald M. Tripp*

Donald M. Tripp  
City Manager

#### **ATTACHMENTS:**

Description	Upload Date	Type
Councillor's Bill No. 34 Re: Amending the 2020 Budget and Authorizing a Supplemental Appropriation	11/16/2020	Attachment
Attachment B - 2020 Appropriation Account Table	11/9/2020	Attachment

#### **REVIEWERS:**

Department	Reviewer	Action	Date
ED - Administration	Stecklein, Mandy	Rejected	11/4/2020 - 11:41 AM
ED - Administration	Evans, Chase	Approved	11/8/2020 - 9:38 AM

ED - Administration	Stecklein, Mandy	Approved	11/11/2020 - 9:57 AM
ED - Administration	Stecklein, Mandy	Approved	11/11/2020 - 9:57 AM
ED - Administration	Fitch, Abby	Approved	11/16/2020 - 12:51 PM

## APPENDIX C.

### PUBLIC NOTICES AND COMMENTS RECEIVED

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## 2020-2024 Westminster Consolidated Plan – Public Notice and Public Input

Webpage Notice: Posted October 12

# Current CDBG Program Notifications

### Seeking Public Input on the 2020-2024 Draft CDBG Consolidated Plan!

The City of Westminster 2020-2024 Draft CDBG Consolidated Plan has been posted for community review and input. Please join in the effort to assure the City's CDBG investments make a difference for our residents and our neighborhoods.

Provide Comments: [CDBG@cityofwestminster.us](mailto:CDBG@cityofwestminster.us)

Voice messages: 303-658-2414

#### Key Dates:

**October 13 – November 13:** 30-day public review and comment period; comments on the plan will be accepted up until the Public Hearing on November 23

**November 23:** Public Hearing on the proposed plan during the Westminster City Council Meeting

Though the meeting may be virtual, public comment is welcomed and appreciated.

Thank you for your input and participation during this challenging time.

**Review the draft consolidated plan** **Review the draft citizen participation plan**

### ¡Buscando la opinión pública!

El Plan Consolidado de los fondos CDBG 2020-2024 de la Ciudad de Westminster se ha publicado para revisión y comentarios públicos. Su opinión ayudara a asegurar que las inversiones de CDBG de la Ciudad hagan la diferencia en las vidas de los residentes y sus vecindarios.

#### Manda tus comentarios:

[CDBG@cityofwestminster.us](mailto:CDBG@cityofwestminster.us)

Mensajes de voz: 303-658-2414

#### Fechas importantes:

13 de octubre – 13 de noviembre: 30 días para revisión y comentarios públicos

23 de noviembre: Audiencia durante la reunión del consejo de la ciudad de Westminster pública sobre el plan propuesto. Aunque la reunión puede ser virtual, los comentarios del público son bienvenidos y apreciados. Solicite servicios de interpretación dejando un mensaje de voz al 303-658-2414, o por correo electrónico al: [CDBG@cityofwestminster.us](mailto:CDBG@cityofwestminster.us)

Gracias por su participación y paciencia durante este tiempo sin precedentes.

**Para revisar** **Para revisar**



## **2020-2024 Westminster Consolidated Plan – Public Notice and Public Input**

### **Base Content for Social Media:**

#### **Seeking Public Input!**

*The City of Westminster 2020-2024 Draft CDBG Consolidated Plan has been posted for community review and input. Please join in the effort to assure the City's CDBG investments make a difference for our residents and our neighborhoods.*

**Review the Plan:** <https://www.westminstereconomicdevelopment.org/housing/cdbg/>

#### **Opportunities to learn more:**

**October 12:** City Council Study Session at 6:30 p.m. Staff will overview the draft plan with City Councillors. This is a great opportunity to learn more about the proposed CDBG investments for the coming five years.

<https://www.cityofwestminster.us/EventDetails?e=8435&od=10/5/2020>

To provide Comments: [CDBG@cityofwestminster.us](mailto:CDBG@cityofwestminster.us)  
Voice messages: 303-658-2414

#### **Key Dates:**

**October 12 – November 13:** 30-day public review and comment

**November 23:** Public Hearing on the proposed plan during the Westminster City Council Meeting

*Though the meetings will be virtual, public comment is welcomed and appreciated.*

<https://www.cityofwestminster.us/EventDetails?e=8436&od=11/9/2020>

*Thank you for your input and participation during this challenging time.*

## **2020-2024 Westminster Consolidated Plan – Public Notice and Public Input**

### **¡Buscando la opinión pública!**

*El Plan Consolidado de los fondos CDBG 2020-2024 de la Ciudad de Westminster se ha publicado para revisión y comentarios públicos. Su opinión ayudara a asegurar que las inversiones de CDBG de la Ciudad hagan la diferencia en las vidas de los residentes y sus vecindarios.*

*Para revisar: <https://www.westminstereconomicdevelopment.org/housing/cdbg/>*

#### **Oportunidades para aprender más:**

**12 de octubre:** Sesión de estudio del Concejo Municipal a las 6:30 p.m. El personal revisará el plan con los concejales de la ciudad. Esta es una gran oportunidad para aprender más sobre las inversiones de los fondos de CDBG y las propuestas para los próximos cinco años.

Manda tus comentarios:  
CDBG@cityofwestminster.us  
Mensajes de voz: 303-658-2414

#### **Fechas importantes:**

**12 de octubre - 13 de noviembre:** 30 días para revisión y comentarios públicos

**23 de noviembre:** Audiencia durante la reunión del consejo de la ciudad de Westminster pública sobre el plan propuesto. Aunque las reuniones serán virtuales, los comentarios del público son bienvenidos y apreciados.

**Gracias por su participación y paciencia durante este tiempo sin precedentes.**



## 2020-2024 Westminster Consolidated Plan – Public Notice and Public Input

### Social Media Posts:

 **City of Westminster, Colorado - Government** Published by Sprout Social · October 15 ·   ...

Seeking Public Input!

The City of Westminster 2020-2024 Draft CDBG Consolidated Plan has been posted for community review and input.

Review the Draft Plan:  
<https://www.westministereconomicdevelopment.org/housing/cdbg/>

Provide Comments: CDBG@cityofwestminster.us  
Voice messages: 303-658-2414



## 2020-2024 Westminster Consolidated Plan – Public Notice and Public Input

**Westminster EcoDevo** @westminsterbiz · Oct 29

The 2020-2024 Community Development Block Grant (CDBG) Consolidated Plan is posted for community review. Our CDBG investments are based on good plans AND good partnerships.

Take a look and give us your thoughts!



CDBG - City of Westminster Economic Development  
The Community Development Block Grant (CDBG)  
provides funding in support of low and moderate-...  
[westminstereconomicdevelopment.org](https://westminstereconomicdevelopment.org)

**Westminster EcoDevo** @westminsterbiz · Oct 31

Balanced housing is good for business! The City employs federal Community Development Block Grant (CDBG) funding to make a difference in our community by supporting neighborhood vitality. Read all about it at



CDBG - City of Westminster Economic Development  
The Community Development Block Grant (CDBG)  
provides funding in support of low and moderate-...  
[westminstereconomicdevelopment.org](https://westminstereconomicdevelopment.org)

**Westminster EcoDevo** @westminsterbiz · Nov 2

Good health, good homes, good neighborhoods: it is what makes Westminster special. The City's draft 2020-2024 Community Development Block Grant Consolidated Plan is posted for your review. Find the draft plan and a link to provide input at:



CDBG - City of Westminster Economic Development  
The Community Development Block Grant (CDBG)  
provides funding in support of low and moderate-...  
[westminstereconomicdevelopment.org](https://westminstereconomicdevelopment.org)

## 2020-2024 Westminster Consolidated Plan – Public Notice and Public Input



**Westminster EcoDevo** @westminsterbiz · Nov 13

...

Still have time to review the plan:



**Westminster EcoDevo** @westminsterbiz · Nov 2

Good health, good homes, good neighborhoods: it is what makes Westminster special. The City's draft 2020-2024 Community Development Block Grant Consolidated Plan is posted for your review. Find the draft plan and a link to provide input at: [westminstereconomicdevelopment.org/housing/cdbg/](https://westminstereconomicdevelopment.org/housing/cdbg/)



**Westminster EcoDevo** @westminsterbiz · Nov 16

...

There is still time to review and comment!



**Westminster EcoDevo** @westminsterbiz · Oct 31

Balanced housing is good for business! The City employs federal Community Development Block Grant (CDBG) funding to make a difference in our community by supporting neighborhood vitality. Read all about it at [westminstereconomicdevelopment.org/housing/cdbg/](https://westminstereconomicdevelopment.org/housing/cdbg/)



**Westminster EcoDevo** @westminsterbiz · Nov 18

...

Coming Up 11/23: Public Hearing on the City's 2020-2024 Community Development Block Grant (CDBG) Consolidated Plan

More info: [cityofwestminster.us/agendas](https://cityofwestminster.us/agendas).

Final week to email your comments on the draft plan for the City's CDBG investments:



CDBG - City of Westminster Economic Development  
The Community Development Block Grant (CDBG)  
provides funding in support of low and moderate-...  
[westminstereconomicdevelopment.org](https://westminstereconomicdevelopment.org)

## 2020-2024 Westminster Consolidated Plan – Public Notice and Public Input

### Comments Received on the plan:

-----Original Message-----

From: Ann Christopher [REDACTED]  
Sent: Thursday, November 12, 2020 3:43 PM  
To: Tayer, Molly <[mtayer@CityofWestminster.us](mailto:mtayer@CityofWestminster.us)>  
Cc: Bill Christopher [REDACTED]  
Subject: CDBG Multi-Year Plan

Hi Molly,

I am having to use Ann's cell phone so I Hope you receive these comments on the above referenced proposed plan.

Before the city would switch its use of CDBG funds to landscaping in the area of the the train station, it should work on existing deficiencies. A key one which is in the eligible area is 72nd Avenue from Sheridan Blvd. to Eliot Street.

This key arterial Street in the heart of Historic Westminster is much in need of replacing and upgrading the street landscaping. The priority of 72nd Avenue is #1 in Historic Westminster. Switch the proposed landscaping funds accordingly.

Another change in the proposed use of HOME Funds has to do with utilization of funds for additional subsidized apartments in the New Downtown. The public has been quite clear in its opposition to continuing more high density in the Down Town. The City's own Community Citizens Survey showed this clearly and the Council removed "the next urban center in Colorado " from its Strategic Plan. Reallocate the HOME funds to other needed housing assistance within eligible areas which are not high density apartments.

Finally, reallocate the proposed funds for the 16 apartment units at 73rd Avenue and Lowell Blvd. The affected neighborhood doesn't want this project. It is ill-conceived from the start and not recommended by the City's own Planning Commission.

Thank you for considering these comments.

Bill Christopher  
[REDACTED]

## 2020-2024 Westminster Consolidated Plan – Public Notice and Public Input

-----Original Message-----

From: Dino V [REDACTED]

Sent: Sunday, November 22, 2020 4:48 PM

To: PublicHearing\_Item10A <[PublicHearing\\_Item10A@CityofWestminster.us](mailto:PublicHearing_Item10A@CityofWestminster.us)>

Subject: Public Comment Concerning Business Item 10A, 2020-2024 CDBG Consolidated Plan

Members of Council — I have concern with moving forward on the Consolidated Plan at this time. I don't believe that the public has been well surveyed. In fact, I received the notice as required by the plan with approximately half of the time to read the plan and to comment having passed. I simply have not had the time to read through and to ask questions of staff. I don't want to see any more money poured into the city building affordable housing south of 80th Avenue. Take care of what you have. Regardless, while I respect that none of us have the ability to meet right now and deadlines are imminent, staff should still have planned to allow for alternative ways to work with the community to solicit input. We have the ability in this city to host virtual meetings and there are community e-mail lists, mailings, etc. That simply was not done. I do like the idea of commenter Bill Christopher that 72nd Ave needs major repairs. While only 23-25 years since the last renovation, much of the work was done shoddy and with failing systems. The trees are dead, the planters are broken and graffiti covered, the irrigation systems don't work, flower are no longer planted, the identifying banners have been removed, the street lights have not been upgraded to LED, many of the street lights are no longer functioning, aged water and sewer lines continue to fail and ancillary but necessary project have not been completed. We couldn't make those comments. So, I recommend that before approving anything in this plan, council direct staff to go back and start over working with the public to see what the public wants.

Thank you,

Dino Valente





## **NOTICE of Public Hearing on the City of Westminster Draft 2020-2024 Community Development Block Grant Consolidated Plan**

*The Consolidated Plan is the City's guiding document for investments made with federal Community Development Block Grant (CDBG) funds during a five-year planning period. CDBG funds are used for projects and programs that benefit the City's low- to moderate-income populations and address blight conditions.*

*Eligible project activities may include, affordable housing activities, certain public facility and infrastructure improvements, and economic development/redevelopment.*

*Community input taken during the creation of the 2020-2024 CDBG Consolidated Plan provides guidance for Staff in setting priorities for each year's CDBG Annual Action Plan.*

**The draft Consolidated Plan can be reviewed at the City's CDBG webpage at:**

<https://www.westminstereconomicdevelopment.org/housing/cdbg/>

**A public hearing will be held on the draft 2020-2024 Consolidated Plan and the 2020 CDBG Annual Action Plan budget on Monday, November 23, 2020 during the regular meeting of the Westminster City Council.**

*The meeting audio will be accessible online and residents may provide testimony in three different ways. Instructions and deadlines to submit comments or sign up to speak are attached to this notice.*

**To listen to the November 23 City Council meeting online:**

**<https://www.youtube.com/user/WestminsterCO/live>**

#### **CITY OF**

Department of Economic  
Development

4800 West 92nd Avenue  
Westminster, Colorado 80031

**P** 303-656-2400

**F** 303-430-8809

[www.westminstereconomicdevelopment.org](http://www.westminstereconomicdevelopment.org)



## **AVISO de audiencia pública sobre la ciudad de Westminster Proyecto del plan consolidado de subvenciones en bloque para el desarrollo comunitario 2020-2024 Plan consolidado**

El Plan Consolidado es el documento guía de la Ciudad para las inversiones realizadas con fondos federales de Subvenciones en Bloque para el Desarrollo Comunitario (CDBG) durante un período de planificación de cinco años. Los fondos de CDBG se utilizan para proyectos y programas que benefician a las poblaciones de ingresos bajos a moderados de la Ciudad y abordan condiciones de deterioro.

*Las actividades del proyecto elegibles pueden incluir actividades de vivienda adsequible, ciertas mejoras de infraestructura y de instalaciones públicas, y Desarrollo económico / reurbanización.*

*Los comentarios de la comunidad tomados durante la creación del Plan Consolidado CDBG 2020-2024 brindan orientación al personal para establecer prioridades para el Plan de Acción CDBG de cada año.*

**El diseño preliminar del Resumen Ejecutivo del Plan Consolidado 2020-2024 está disponible en línea en:**

<https://www.westminstereconomicdevelopment.org/housing/cdbg/>

**Se llevará a cabo una audiencia pública sobre el diseño preliminar del plan y el presupuesto del Plan de Acción Anual de CDBG 2020 el lunes 23 de noviembre de 2020 durante la reunión regular del Concejo Municipal de Westminster.**

*El audio de la reunión estará accesible en línea y los residentes pueden brindar testimonio de tres maneras diferentes.*

*Para obtener traducción al español para la reunión del Concejo Municipal del 23 de noviembre o apoyo para participar en la audiencia pública, envíe su solicitud por correo electrónico, incluyendo su nombre y número de teléfono, a [CDBG@cityofwestminster.us](mailto:CDBG@cityofwestminster.us)*

**Para escuchar la reunión del Concejo Municipal del 23 de noviembre en línea:**  
<https://www.youtube.com/user/WestminsterCO/live>

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4800 West 92nd Avenue  
Westminster, Colorado 80031

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F 303-430-1809  
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## APPENDIX D. EMAIL DISTRIBUTION LIST

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## 2020 Westminster Consolidated Plan: Community Notice Distribution List

Organization	Contact
Adams County Community Development	Melissa Scheere Ric Reed
Foothills Regional Housing Partners	Lori Rosendahl
Maiker Housing Partners	Drew O Connor
Legacy Foundation	Lauren Werner
Brothers Redevelopment Inc	Yvonne Duvall
CoW Human Services Board 9 to 5	John Prejzner
ACCESS Housing	Alicia Aguilar
Adams County Fair Housing Advisory Board	<a href="#">Cassandra Bossingham</a>
Adams County Fair Housing Advisory Board	<a href="#">Esther Ramirez</a>
Adams County Foundation	<a href="#">Rebeca Zamora</a>
Adams County Head Start Policy Council	<a href="#">Vickie Davis,</a>
Admas County Community Enrichment	<a href="#">Maria Zubia</a>
Adams County Veterans Advisory Commission	<a href="#">Robert Sheetz</a>
Adams County Workforce Development Board	<a href="#">Jodie Kammerzell</a>
Adams County, Community Safety and Well Being	Paolo Diaz
Adams County, Community Safety and Well Being	Sam Olson
Almost Home	Ashley Dunn
Brighton Housing Authority	Joseph A. Espinosa
CASA of Adams County and Broomfield	Lindsay Lierman

## 2020 Westminster Consolidated Plan: Community Notice Distribution List

Center for People with Disabilities	Melanie Shotwell
Center for People with Disabilities	Howard Levett
Cold Weather Care	Nicole Rodriguez
Cold Weather Care	Michael McKelvey
Community Resources and Housing Development	Arturo Alvarado
Protegete	Finangi
Early Childhood Partnership of Adams County	Lisa Jansen Thompson
Grid Alternatives	Adrienne Dorsey
Growing Home	Karen Fox Elwell
Low Income Family Empowerment	Arrah Gallaher
Metro Denver Homeless Initiative	Matt Meyer
North Metro Community Services	Shilo Carson
Platte Valley Medical Center	E. Gaye Woods
Rebuilding Together	Samantha Smith
Rocky Mountain Communities Senior Resource Center	Tracy Gargano
Services De La Raza (Services For The People)	Lorette Trujillo
Shiloh House, Inc.	Rudy Gonzales
The Senior Hub, Inc.	Beth Miller
The Senior Hub, Inc.	Stephanie Knight
The Senior Hub, Inc.	Maida Pearce
Tri-County Health Department Board	<a href="#">Ronnae Brockman</a>
UNE	<a href="#">Sent to: Info@</a>

## 2020 Westminster Consolidated Plan: Community Notice Distribution List

### CDBG | Resident Contacts

Penny Quinn  
Bill Christopher  
Ed Crowe  
Bret Koester  
Richard Koester  
Gary Shea  
Glenda Barlow  
Charles Najjar  
Dan Nielsen  
Torri Raine  
Christie Poland  
Bob Landgraf, Jr.  
Bev Bishop  
Dave Feazell  
Debbie Teter  
Dino Valente  
Linda Crump  
Lynne Poland  
Sandra Koehler  
Elizabeth Price  
Ellen Buckley

APPENDIX E.  
COMMUNITY ENGAGEMENT SUMMARY

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## APPENDIX E.

### Community Engagement Summary

This section reports the findings from the community engagement conducted to support the update of Westminster's housing market study, new Five-year Consolidated Plan, and Analysis of Impediments to Fair Housing Choice. It explores residents' housing choices and preferences, challenges and experiences with displacement and housing discrimination, and access to opportunity.

It is important to note that this resident survey was conducted in conjunction with a survey of Adams County residents overall. The City of Westminster is part of the Adams County HOME Consortium, which administers federal housing funding to support affordable housing solutions in Westminster, Thornton, Brighton, and other areas of Adams County. As such, this section compares the perspectives of Westminster residents to those of other cities in Adams County and to the county overall.

The Root team is grateful to the residents who shared their experiences and perspectives with fair housing and access to opportunity by participating in the resident survey, and resident and stakeholder focus groups.

# CITY OF WESTMINSTER

## COMMUNITY ENGAGEMENT BY THE NUMBERS



### WHERE RESPONDENTS LIVE

525	Thornton
535	Balance of Adams County
297	Westminster
252	Brighton
99	Northglenn

### CITY OF WESTMINSTER PARTICIPANTS

#### HOUSING STATUS

Homeowners	159
Renters	81
Precariously housed/homeless	57

#### HOUSEHOLD SIZE

1-2 person	122
3-4 person	89
5+ person	35


#### HOUSEHOLD INCOME

< \$25,000	76
\$25,000 up to \$50,000	48
\$50,000 up to \$100,000	52
> \$100,000	57


#### IDENTIFIED AS

White	183
Hispanic	49
Other Minority	20


 101 had a child under 18


 84 had a household member with a disability

 51 is a senior (age 65+)


 51 live with any adult family members

 36 live alone

 25 are single parents (no other adults in home)

 20 live in publicly-assisted housing

 20 are single parents living with other adult family/roommates

 14 live with roommates/friends

Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.

**Explanation of terms.** The terms used throughout this section include:

- "Precariously housed" includes residents who are currently homeless or living in transitional or temporary/emergency housing and residents who are "staying with friends/family"—people who live with friends or family but are not themselves on the lease or property title. These residents may (or may not) make financial contributions to pay housing costs or contribute to the household exchange for housing (e.g., childcare, healthcare services).
- "Disability" indicates that the respondent or a member of the respondent's household has a disability of some type—physical, mental, intellectual, developmental.
- "Housing subsidy" refers to a respondent whose household's housing costs are subsidized by a housing voucher (e.g., Section 8/Housing Choice Voucher) or whose household lives in a building where their rent is based on their income. This includes LIHTC buildings, project-based Section 8, deed-restricted ownership products, and any other place-based housing subsidies.

**Geographic note.** Throughout this section, survey data reported for Adams County overall include Westminster residents. All other data are restricted to residents of Westminster.

**Sampling note.** The survey respondents do not represent a random sample of the Westminster or the Adams County population. A true random sample is a sample in which each individual in the population has an equal chance of being selected for the survey. The self-selected nature of the survey prevents the collection of a true random sample. Important insights and themes can still be gained from the survey results however, with an understanding of the differences of the sample from the larger population.

Compared to the city's overall demographic and socioeconomic characteristics, survey respondents:

- Are more likely to be renters (46% v. 39%)
- Are more likely to have children under 18 (34% v. 26%)
- Have a lower median household income (\$25,000 up to \$50,000 v. \$71,626);
- Are about as likely to be Hispanic (19% in the survey v. 21% in the city of Westminster);
- Are about as likely to have Limited English Proficiency (4% of respondents took the survey in Spanish, compared to the city's 7% LEP rate); and
- Are about as likely to be age 65 or older (17% v. 14%).



At the time of the survey (January-February 2020), respondents' employment situation included:

- Employed full time (40%);
- Retired (20%);
- Employed part time (8%);
- Self-employed (8%);
- Unemployed (7%);
- Homemaker (7%); and
- Disability benefit recipient (7%).

**Sample size note.** When considering the experience of members of certain groups in Westminster, the sample sizes are too small ( $n < 40$  respondents) to express results quantitatively. In these cases, we describe the survey findings as representative of those who responded to the survey, but that the magnitude of the estimate may vary significantly in the overall population (i.e., large margin of error). Survey data from small samples are suggestive of an experience or preference, rather than conclusive.

**Framework for presenting results.** Findings from the survey are summarized for segments of the respondent population—e.g., income range, household characteristics—where sample sizes are sufficient for reporting.

**Survey timing and COVID pandemic.** It is important to note that the resident survey that was conducted during January and February 2020, in the early stages of the of the COVID-19 outbreak. As such, the survey primarily reflects pre-COVID economic conditions and should be considered a baseline measure of resident needs. The housing situation and needs of residents during that period can help inform short- and long-term policy responses to stabilize households and preserve and add to the supply of affordable housing.

## Primary Findings

Westminster is a community of opportunity, with healthy neighborhoods and access to economic opportunities like good public schools and job opportunities. The resident survey and focus groups reveal that Westminster residents value their community. For some residents, however, living in Westminster is not without its tradeoffs and challenges, particularly for renters, households earning less than \$50,000 a year, Hispanic households, families with children, and people with disabilities.



- Many of the differences in housing choice and experience are correlated with household income and housing situation, particularly renters and those who are precariously housed. These households are more likely to struggle to pay the rent, worry about rent increases, and lack the resources to change their housing situation.
- Westminster respondents who are precariously housed, low income households, and Hispanic respondents are most likely to rate their home as being in fair/poor condition. Westminster renters are nearly five times more likely than homeowners to identify their home as being in fair/poor condition.
- More than one in three (35%) of residents who are *currently* precariously housed experienced displacement in the past five years, as did one in four (25%) renters. Only one in 50 current homeowners report recent displacement.
- Of the respondents whose household includes a member with a disability, four out of five (81%) have accessibility needs in the home or to access the home. One in three (35%) live in a home that does not meet the accessibility needs of their household member with a disability.
- For those respondents who would move if they had the opportunity, the most typical barriers reflect market realities (i.e., lack of housing to rent or buy that the respondent can afford) and a lack of resources to pay the costs required to move into a new rental unit, especially deposits, application fees, and moving expenses. This compounds the difficulty experienced finding an affordable home to rent and is likely a significant barrier keeping those who are precariously housed—doubled up, staying with friends and family, or homeless—in their tenuous situation.

## Current Housing Choice

This section explores residents' housing preferences, including the factors most important to them when they chose their current housing.

**Most important factors in choosing current home.** When asked to identify the factors most important to them Westminster residents across the board were most likely to say “cost/I could afford it”. Other important factors in the top five responses for Westminster residents overall include:

- Like the neighborhood;
- Needed somewhere to live and it was available;
- Liked the type of home/apartment; and
- Close to work/job opportunities.

The importance of certain preference-based qualities—proximity to work, quality of schools, close to family/friends, number of bedrooms—varied by household income and household composition.

These factors are very similar to the findings from the 2016 Westminster Live Work Survey; in that survey, the top reasons for choosing to live in the city of Westminster were cost/affordability, the city's location, liking the home, and the neighborhood.

**Indicators of housing choice difficulties.** Not all of the top five factors reflect personal preferences; some signal difficulties certain households experience when finding a place to live. These factors are not personal preferences for qualities about the place where they live, but indicators of a tight housing market, income constraints, and other barriers some households experience when seeking housing. These include:

- ***Needed somewhere to live and it was available.*** Top five factor for Westminster respondents overall, renters, precariously housed, households with incomes less than \$50,000, Hispanic respondents, households with children, households that include a member with a disability, and Adams County respondents overall.
- ***Landlord would rent to me despite bad credit/past evictions/history.*** Top five factor among renters, precariously housed, households with incomes less than \$25,000, and Hispanic respondents.

Figures 1 and 2 present the top five responses by housing situation, household income, and selected respondent characteristics.

**Figure 1. Most Important Factors in Choosing Current Home, by Housing Situation and Income**



Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.

**Figure 2.**

**Most Important Factors in Choosing Current Home, by Selected Respondent Characteristics**



Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.

## Desire to Move

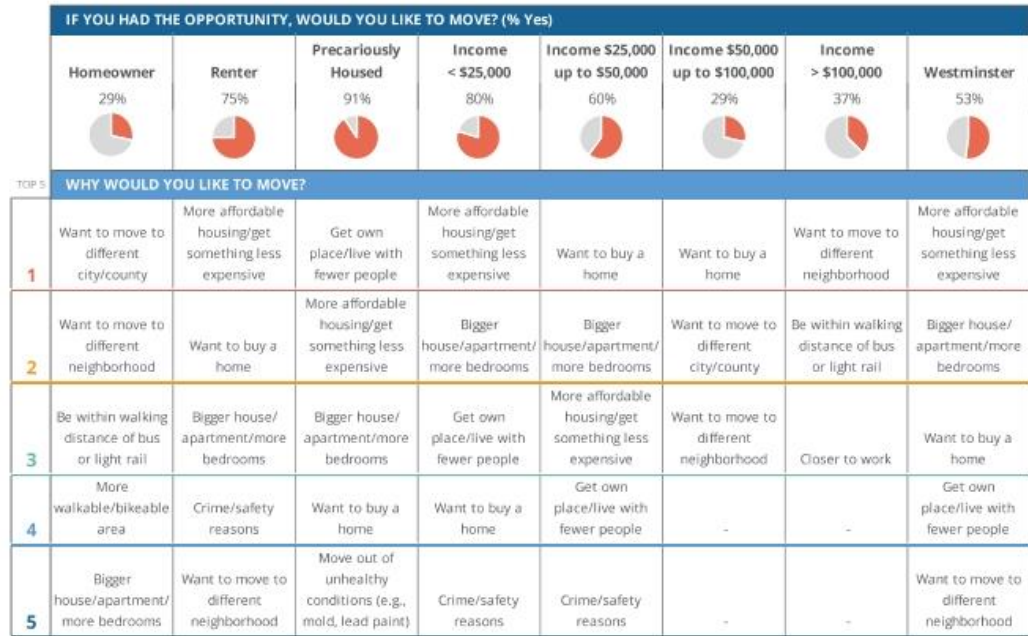
Figures 3 and 4 presents the proportion of respondents who would move if they had the opportunity and the top five reasons why they want to move. Slightly more than half (53%) of Westminster respondents would move if they had the opportunity; this is similar to Adams County respondents overall. Renters, respondents who are precariously housed, and low income households are much more likely to want to move than homeowners or higher income households.

**Why do residents want to move?** The top five reasons why a respondent would move if they had the opportunity varies by housing situation, income, and personal characteristics. Moving to a more affordable or less expensive situation, buying a home, and getting a bigger home or more bedrooms are common reasons to want to move. Some key differences include:

- Homeowners and higher income households would move to a different city or county or neighborhood and desire being close to amenities like walking distance to bus or light rail, living in a more walkable/bikeable area, or being close to work.
- Renters and low income households are more likely to want to move to buy a home, live in a bigger home, and for crime/safety reasons.
- Precariously housed residents want to get their own place, live somewhere more affordable, and move out of unhealthy conditions (e.g., mold, lead paint).
- In addition to affordability, homeownership, more room and getting their own place, Hispanic households and household with children want to move so their kids can go to better schools.
- Downsizing—moving to a smaller home—is a top factor for seniors who want to move. Moving to a home with one-level or a first floor unit with no stairs is a primary reason why respondents whose household includes a member with a disability want to move.

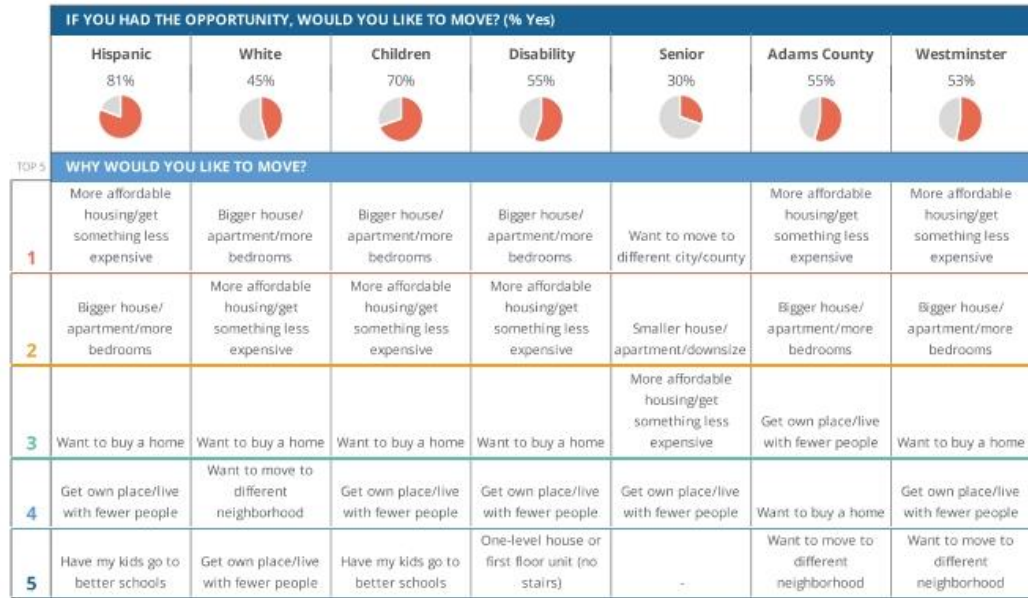
In the 2016 Westminster Live Work Survey, the primary reasons residents planned to move in the next five years were similar in some ways—wanting to buy a home, moving to a neighborhood with transit or walkable amenities (shopping, services, entertainment) and moving closer to work, as well as moving from an attached product to a single family home.

**Figure 3.**  
**Desire to Move and the Top 5 Reasons Why, by Housing Situation and Income**



Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.

**Figure 4.**  
**Desire to Move and the Top 5 Reasons Why, by Selected Respondent Characteristics**



Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.



**What prevents them from moving?** Across the board, even among the highest income households, economic factors prevent respondents who would move if they had the opportunity from moving. As shown in Figures 5 and 6, these economic factors include:

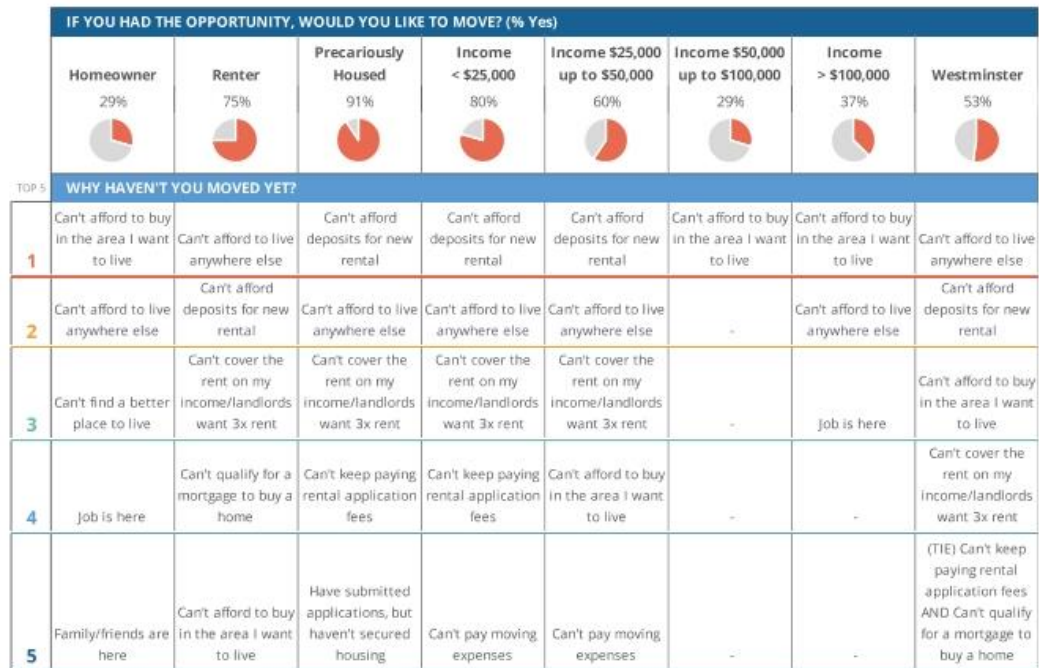
- Can't afford to live anywhere else;
- Can't afford deposits for new rental;
- Can't afford to buy in the area I want to live;
- Can't cover the rent on my income/landlords want 3X the rent;
- Can't keep paying rental application fees;
- Can't qualify for a mortgage to buy a home; and
- Can't pay moving expenses.

In the 2016 survey, respondents who wanted to buy a home were asked why they still rented. The greatest proportion of respondents to that survey were unable to buy because they lacked the down payment, did not have sufficient income to pay a mortgage, or could not qualify for a mortgage.



Figure 5.

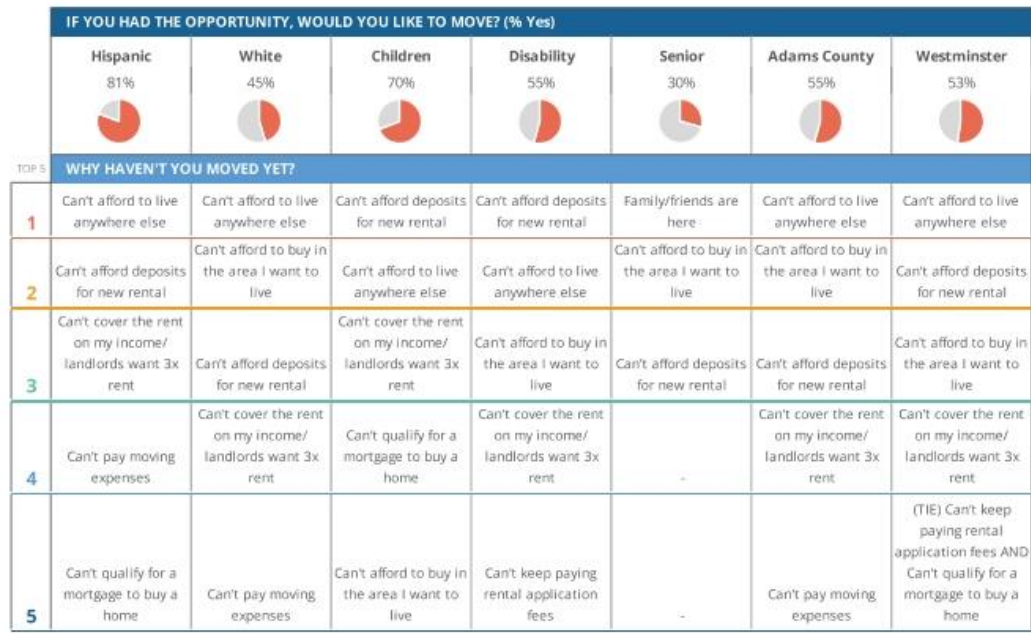
Desire to Move and Barriers to Moving, by Housing Situation, by Housing Situation and Income



Note: - sample size too small to report.

Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.

**Figure 6.**  
**Desire to Move and Barriers to Moving, by Selected Respondent Characteristics**



Note: - sample size too small to report.

Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.

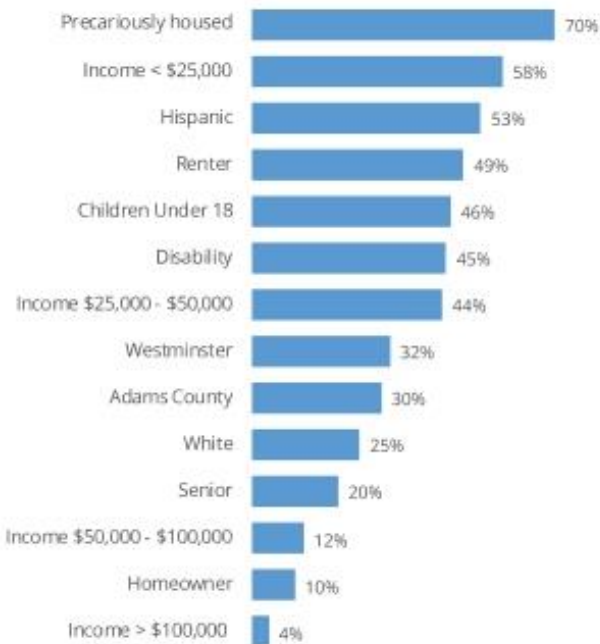
### Housing Challenges

This section examines the extent to which survey respondents experience challenges in their current housing situation.

**Housing condition.** Overall, about one in three (32%) Westminster respondents characterized the condition of their home as being in “fair” or “poor” condition, similar to Adams County respondents (Figure 7). Westminster respondents who are precariously housed, low income households, and Hispanic respondents are most likely to rate their home as being in fair/poor condition. As shown, renters are nearly five times more likely than homeowners to identify their home as being in fair/poor condition.

**Figure 7.**  
**How would you**  
**rate the condition**  
**of your home?**  
**(% Fair/Poor)**

Source:  
Root Policy Research from the  
2020 City of Westminster and  
Adams County Housing and  
Community Needs Resident  
Survey.



Of those with homes in fair or poor condition, half (53%) of respondents say that their home needs repairs. Homeowners are more likely than renters to say their home needs repairs (100% of homeowners who rate their home fair/poor v. 59% of renters).

Among homeowners who need repairs, 13 out of 14 cannot afford to make the needed repairs. Among renters, one in five say their landlord refuses to make repairs.

Among all respondents who report needing repairs, at least one in 10 identified the following as their most needed repair:

- Weatherization (15%);
- Kitchen appliances (13%);
- Windows (10%); and
- Flooring (10%).

Participants in an open house held for the 2016 Westminster housing study also raised condition issues as a concern and included discussion of landlords not properly maintaining properties while still raising rents. These comments are very similar to those from 2020 survey respondents:

- *"The complex has changed. Will not fix things properly or paint."*
- *"Landlord does minimal. Only emergencies."*

**Housing challenges.** Figures 8 and 9 present the top ten housing challenges experienced by the greatest proportion of Westminster survey respondents overall, and by housing situation, income, and selected respondent characteristics.

- About one in four (23%) respondents say they "struggle to pay my rent/mortgage" and 64 percent of renters worry about their rent going to up to an amount they can't afford.
- One in three (35%) Hispanic respondents, respondents with children (33%), and respondents whose household includes a member with a disability (33%) struggle to pay their rent/mortgage. Seniors and higher income households are least likely to report struggling to pay monthly their rent/mortgage.
- Half of renters want to buy a home but can't afford the down payment (51%), and two in five (44%) want to buy but have too much debt to qualify for a mortgage.
- Overall, 15 percent of Westminster respondents worry about poor/low school quality in their neighborhood, similar to Adams County respondents (13%). One in four (25%) high income households and 24 percent of households with children are concerned about poor school quality.
- Renters (19%) and households with incomes of \$25,000 up to \$50,000 (23%) are more likely to be concerned by high crime in their neighborhood than the typical Westminster respondent (13%).

**Figure 8.**  
**Housing Challenge, by Housing Situation and Income**

Housing Challenge	<div> <div>Higher than Region (&gt;5 percentage points)</div> <div>About the same as Region (+/- 5 percentage points)</div> <div>Lower than Region (&lt;5 percentage points)</div> </div>							Westminster
	Homeowner	Renter	Precariously Housed	Income < \$25,000	Income \$25,000 - \$50,000	Income \$50,000 - \$100,000	Income > \$100,000	
I struggle to pay my rent/mortgage	8%	49%	28%	38%	42%	6%	0%	23%
I worry about my rent going up to an amount I can't afford	-	64%	18%	38%	40%	6%	4%	21%
Too much traffic/too much street/highway noise	28%	17%	2%	13%	23%	27%	21%	20%
I want to buy a house but can't afford the down payment	-	51%	26%	29%	35%	12%	9%	20%
I want to buy a house, but I have too much debt to qualify for a mortgage	-	44%	26%	32%	31%	6%	5%	18%
I have bad/rude/loud neighbors	13%	21%	14%	21%	23%	17%	14%	15%
My house or apartment isn't big enough for my family members	3%	26%	33%	32%	15%	4%	7%	15%
Poor/low school quality in my neighborhood	18%	12%	4%	9%	13%	15%	26%	13%
High crime in my neighborhood	13%	19%	7%	13%	23%	12%	11%	13%
Inadequate sidewalks, street lights, drainage, or other infrastructure in my neighborhood	12%	16%	2%	12%	15%	12%	11%	11%

Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.

**Figure 9.**  
**Housing Challenge, by Selected Respondent Characteristics**

	Higher than Region (>5 percentage points)	About the same as Region (+/- 5 percentage points)	Lower than Region (<5 percentage points)				
Housing Challenge	Hispanic	White	Children	Disability	Senior	Adams County	Westminster
I struggle to pay my rent/mortgage	35%	20%	33%	33%	16%	22%	23%
I worry about my rent going up to an amount I can't afford	45%	16%	33%	30%	14%	18%	21%
Too much traffic/too much street/highway noise	0%	23%	15%	20%	22%	17%	20%
I want to buy a house but can't afford the down payment	39%	15%	32%	19%	10%	15%	20%
I want to buy a house, but I have too much debt to qualify for a mortgage	37%	14%	30%	24%	6%	15%	18%
I have bad/rude/loud neighbors	22%	17%	25%	19%	12%	15%	15%
My house or apartment isn't big enough for my family members	39%	9%	29%	20%	2%	13%	15%
Poor/low school quality in my neighborhood	14%	16%	24%	8%	14%	12%	13%
High crime in my neighborhood	8%	15%	15%	15%	8%	13%	13%
Inadequate sidewalks, street lights, drainage, or other infrastructure in my neighborhood	8%	14%	8%	11%	10%	11%	11%

Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.

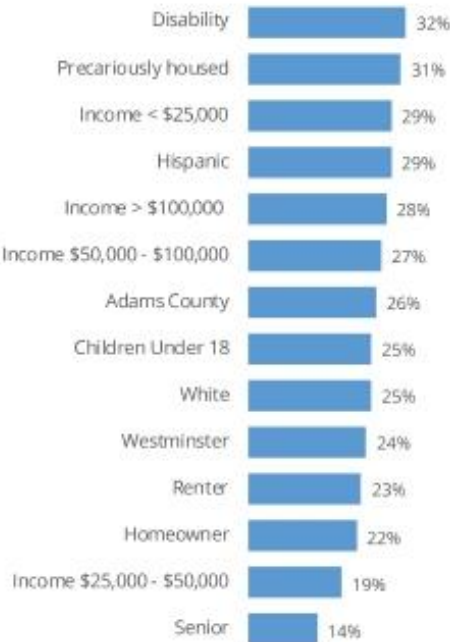
**Affordability challenges—doubling up.** One in four Westminster survey respondents (24%) have someone over the age of 18 living with them because that person cannot afford to live on their own. Most of these adults are family members and are not students.

*"This isn't my apartment; I stay with family, but I need my own place for my kids and I."*

As shown in Figure 10, households that include a member with a disability are most likely to have someone staying with them. About the same proportion of low income households as high income households have other adults living with them. Seniors are least likely to have another adult living in the home because that other adult cannot afford to live on their own.

**Figure 10.**  
**Does anyone over the age of 18 live with you because they cannot afford to live on their own? (% Yes)**

Source:  
Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.



**Affordability challenges—rising costs.** Figure 11 presents median monthly housing and utility costs provided by respondents in the first quarter of 2020 for Westminster, Adams County, and for selected respondent characteristics. It also shows the share of respondents whose rent or mortgage and property tax/insurance (PTI) increased from 2018 to 2019 and the median amount of the increase. The same information is provided for monthly utility costs. From 2018 to 2019, about half of Westminster respondents experienced an increase in rent or mortgage/PTI. The median monthly



housing cost increase among Westminster households who experienced an increase is \$100.

**Figure 11.**  
**Monthly Median Housing and Utility Costs, % of Respondents with Housing or Utility Cost Increases from 2018 to 2019, and Median Amount of Monthly Increase**

	Median Rent/ Mortgage	Rent or mortgage/PTI Increased In 2019? (% Yes)	Median Increase	Median Utilities	Utilities Increased In 2019? (% Yes)	Median Increase
<b>Jurisdiction</b>						
Westminster	\$1,300	 48%	\$100	\$200	 74%	\$60
Adams County	\$1,450	 48%	\$100	\$205	 61%	\$60
<b>Tenure</b>						
Homeowner	\$1,500	 50%	\$80	\$225	 88%	\$60
Renter	\$1,156	 58%	\$100	\$150	 53%	\$50
Precariously housed	-	 28%	-	-	 49%	-
<b>Income</b>						
< \$25,000	\$991	 39%	\$54	\$150	 52%	\$60
\$25,000 - \$50,000	\$1,156	 69%	\$86	\$180	 75%	\$75
\$50,000 - \$100,000	\$1,391	 59%	\$75	\$200	 87%	\$50
\$100,000+	\$1,875	 44%	\$100	\$300	 82%	\$75
<b>Household Characteristics</b>						
Hispanic	\$1,200	 45%	\$150	\$200	 57%	\$75
White	\$1,400	 50%	\$76	\$200	 79%	\$50
Children < 18	\$1,254	 56%	\$100	\$250	 71%	\$60
Disability	\$1,125	 50%	\$50	\$200	 67%	\$70
Senior	\$1,041	 41%	\$60	\$232	 90%	\$60

Note: - sample size too small to report. Median increase for both housing costs and utilities are the monthly amount of the increase over 2018 monthly costs. Housing cost data do not include HOA dues. Respondents provided average monthly utility costs, factoring in seasonal differences in utilities.

Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.



Some respondents offered personal experiences in response to this question:

*"I need something I can afford. I don't work, and I'm my daughter's care giver. She gets SSI. It doesn't pay the bill's. I had to quit my job of 18 years to care for her. Need help."*

**Housing challenges—disability.** Of the respondents whose household includes a member with a disability, four out of five (81%) have accessibility needs in the home or to access the home. **One in three (35%) live in a home that does not meet the accessibility needs of their household member with a disability.**

The most common improvements or modifications needed include:

- Grab bars in bathrooms;
- Ramps;
- Reserved accessible parking spot by entrance;
- Stair lifts; and
- Wider doorways.

**Other housing challenges experienced by people with disabilities.** In addition to the housing challenges explored above, respondents whose household includes a member with a disability reported other housing challenges they and their family experience. Among respondents whose household includes a member with a disability, these challenges are:

- "I can't afford the housing that has accessibility features I need (e.g., grab bars, ramps, location, size of unit)"—15 percent of all disability households and 14 percent of renter households that include a member with a disability;
- "I worry about retaliation if I report harassment by my neighbors/building staff/landlord" (15% v. 29%);
- "I have a disability or a household member has a disability and cannot get around the neighborhood because of broken sidewalks or no sidewalks" (13% and 21%); and
- "I worry if I request an accommodation for my disability my rent will go up or I will be evicted" (14% of renters).

**Most needed services or supports to achieve or preserve the housing situation best for household member with a disability.** Accessibility modifications, including assistance to pay for or reduce the cost of modifications, and accommodations, access to transportation, and case management to help families in need navigate housing and services are the primary factors described by respondents.

- *"Informing the person renting that they can get things modified within reason."*
- *"Assistance in knowing what to do to get housing. I keep finding out I don't know what I'm doing."*
- *"Help with accessibility on a sliding pay scale for porches, stairs."*
- *"More affordable and handicapped accessible homes."*
- *"Good public transportation that will come to the house."*
- *"We have struggled since we became homeless. My disabled son is very hard to have deal with on a daily basis."*
- *"Renovated bathroom for wheelchair accessibility. Ramp out the back door. Widened back door and widened interior doors."*
- *"Help with driving to doctor appointments in bad weather, shopping and housework."*

**Access to community amenities, facilities, and services.** When asked what is needed most to help the member of the household with a disability participate in community activities and amenities, transportation access and sidewalk improvements were the most common responses. Transportation access includes improved bus service, on weekends and to destinations, and availability of accessible parking at events and destinations.

- *"Adequate walkways for disabled in all areas mentioned above. Easy access to all areas and more handicap parking spaces everywhere!"*
- *"Better bus service, especially on weekends."*
- *"It would be nice to have a low sensory day or early open time for kids that have processing disorders. Currently the only program that I'm aware of that offers this is the Museum of Nature and Science."*
- *"Cheaper or discounted public transportation community events that are free."*
- *"I use Senior Source but would like to be able to have more sources and wider area of coverage for these rides."*
- *"More WHEELCHAIR VAN Accessible parking but MONITORED for illegal parking. When I take my daughter to Kid's Night Out at Westminster City Park Rec Center on Friday nights, there is only ONE space that has an access aisle wide enough for me to get my Van ramp down and off of it. It's rare that I am able to park in this spot because other people without Disability plates/tags park in this space."*

- *"Safe walk paths, security and easy access."*

## Displacement and Recent Experience Seeking Housing















This section explores residents' experience seeking a place to rent or buy in the region and the extent to which displacement—having to move when they do not want to move—is prevalent. For those respondents who seriously looked for housing in the past five years, the survey also examined the extent to which respondents were denied housing to rent or buy and the reasons why they were denied.

**Displacement experience.** In the last five years, 14 percent of Westminster respondents had to move out of a home in the city when they did not want to move, similar to Adams County respondents (13%). Figure 12 presents the share of residents who experienced displacement in the last five years and the share who attribute their displacement experience to "rent increased more than I could pay," "lost job/hours reduced", "health/medical reasons," and "was living in unsafe conditions (e.g., domestic assault, harassment)." The incidence of displacement varied widely by the respondent's current housing situation, income, and ethnicity.

- More than one in three (35%) of residents who are *currently* precariously housed experienced displacement in the past five years, as did one in four (25%) renters. Only one in 50 current homeowners report recent displacement.
- Three in 10 (29%) households with incomes less than \$25,000 and nearly one in five (17%) households with incomes of \$25,000 up to \$50,000 experienced displacement, compared to one in 20 (5%) households with incomes greater than \$100,000.
- Hispanic households are three times more likely than White households to have experienced displacement in the past five years (31% v. 10%).

Figure 12.

In the past five years, have you had to move out of a home or apartment in Westminster or the Adams County area when you did not want to move? (% Displaced)

	Percent Displaced	REASON FOR DISPLACEMENT			
		Rent increased more than I could pay	Lost job/hours reduced	Health/ medical reasons	Was living in unsafe conditions (e.g. domestic assault, harassment)
Jurisdiction					
Westminster	 14%	28%	23%	18%	13%
Adams County	 13%	36%	17%	9%	12%
Tenure					
Homeowner	 2%	-	-	-	-
Renter	 25%	22%	22%	28%	11%
Precariously housed	 35%	28%	22%	11%	17%
Income					
< \$25,000	 29%	36%	32%	36%	18%
\$25,000 - \$50,000	 17%	-	-	-	-
\$50,000 - \$100,000	 2%	-	-	-	-
\$100,000+	 5%	-	-	-	-
Household Characteristics					
Hispanic	 31%	27%	53%	33%	20%
White	 10%	37%	16%	26%	16%
Children < 18	 16%	33%	50%	28%	17%
Disability	 18%	20%	27%	27%	33%
Senior	 6%	-	-	-	-

Note: - sample size too small to report.

Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.

**Recent experience seeking housing.** Overall, 45 percent of survey respondents seriously looked for housing to rent or buy in the past five years, where "serious" looking includes touring homes or apartments, putting in applications or applying for mortgage financing. These respondents identified issues they experienced when seeking housing to rent or buy that may signal disparate treatment by housing providers. Those include:

- One in five (21%) of current renters had the experience of being told a unit was available by phone, only to be told it was rented when the respondent arrived in person. Twenty-nine percent of those with disabilities and 30 percent of those who are currently precariously housed had this experience.
- Low income households, respondents who are currently precariously housed, and respondents with children under 18 are more likely than the typical Westminster rental seeker to experience landlords not returning calls about unit availability.
- Low income households and respondents whose household includes a member with a disability are more likely than others to report that a bank or lender denied an application for a home loan.

**Figure 13.**

**When you looked for housing in Westminster or the Adams County area in the past five years, did you experience any of the following?**

Higher than Region (>5 percentage points)  
 About the same as Region (+/- 5 percentage points)  
 Lower than Region (<5 percentage points)

When you seriously looked for housing in Adams County in the last five years, did you experience any of the following...?	Homeowner	Renter	Precariously Housed	Income < \$25,000	White	Children	Disability	Westminster
Landlord did not return calls asking about a unit	4%	33%	45%	39%	19%	28%	24%	21%
A bank or other lender would not give me a loan to buy a home	7%	28%	10%	24%	14%	19%	24%	15%
I was told the unit was available over the phone, but when I showed up in person, the landlord told me it was no longer available	2%	21%	30%	24%	9%	15%	29%	13%
Landlord did not return emails asking about a unit	4%	21%	20%	13%	13%	17%	10%	12%
A bank or other lender charged me a high interest rate on my home loan	5%	3%	5%	3%	4%	0%	7%	4%
I requested a disability accommodation for myself or my family and it was not made	0%	0%	10%	5%	1%	0%	5%	2%
The real estate agent only showed me homes in neighborhoods where most people were of my same race or ethnicity	2%	0%	0%	0%	0%	0%	2%	1%

Note: Sample sizes of respondents who seriously looked for housing too small to report for Hispanic households, households with incomes of \$25,000 up to \$50,000, households with incomes of \$50,000 up to \$100,000, households with incomes greater than \$100,000 and seniors.

Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.

**Denied housing to rent or buy.** Of those who seriously looked for housing, one in three (34%) were denied housing to rent or buy, mostly due to insufficient income (63%) and bad credit (53%). Figure 14 presents the proportion of residents who seriously looked for housing and were denied and the share who attribute denial to "income too low," "bad credit," "lack of stable housing record," "criminal history," and "eviction history."

As shown, both denial rates and the reasons for denial vary by respondent characteristics. Respondents who with denial rates nearly twice as high as those experienced by Westminster respondents overall include Hispanic respondents (68%), precariously housed respondents (65%), households with incomes less than \$25,000 (63%), and renters (62%). Although sample sizes are small, lack of sufficient income and bad credit are the most common reasons for denial.

**Figure 14.**  
**If you looked seriously for housing to rent or buy in Westminster or the Adams County area in the past five years, were you ever denied housing? (% Denied)**

	Percent denied housing to rent or buy in the past 5 years	REASON FOR DENIAL				
		Income too low	Bad credit	Lack of stable housing record	Criminal history	Eviction history
Jurisdiction						
Westminster	<div><div></div></div> 34%	63%	53%	18%	15%	15%
Adams County	<div><div></div></div> 10%					
Tenure						
Homeowner	<div><div></div></div> 5%	-	-	-	-	-
Renter	<div><div></div></div> 62%	67%	46%	13%	17%	8%
Precariously housed	<div><div></div></div> 65%	-	-	-	-	-
Income						
< \$25,000	<div><div></div></div> 63%	71%	54%	25%	21%	13%
\$25,000 - \$50,000	<div><div></div></div> 52%	-	-	-	-	-
\$50,000 - \$100,000	<div><div></div></div> 13%	-	-	-	-	-
\$100,000+	<div><div></div></div> 0%	n/a	n/a	n/a	n/a	n/a
Household Characteristics						
Hispanic	<div><div></div></div> 68%	-	-	-	-	-
White	<div><div></div></div> 26%	-	-	-	-	-
Children < 18	<div><div></div></div> 46%	-	-	-	-	-
Disability	<div><div></div></div> 44%	-	-	-	-	-
Senior	-	-	-	-	-	-

Note: - sample size too small to report.

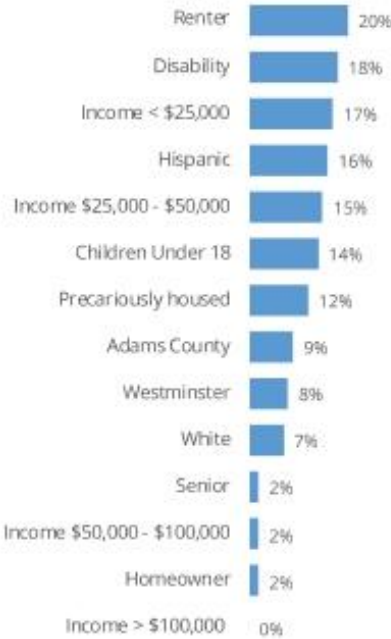
Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.



**Experience with housing discrimination.** Overall, two in 25 (8%) Westminster survey respondents felt they experienced discrimination when looking for housing. This is similar to the rate among all Adams County respondents (9%). Renters, respondents whose household includes a member with a disability, low income households, and Hispanic households are all twice as likely to say they experienced discrimination when looking for housing.

**Figure 15.**  
**When you looked for housing in Westminster or the Adams County area, did you ever feel you were discriminated against?**

Source:  
Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.



Nearly three out of four respondents (72%) who think they experienced housing discrimination when looking for housing in Westminster or Adams County say that the incident took place in the past five years, and two in five (38%) said that it occurred in 2019.

**Reasons for discrimination.** Respondents described the reasons they think they experienced discrimination when looking for housing to rent or buy in Westminster or Adams County. These include:

- Income (too low) (36%);
- Race or ethnicity (27%);
- Familial status (27%);

- History of eviction or foreclosure (23%);
- Disability (18%);
- Age (18%);
- Language/Limited English Proficiency (LEP) (14%);
- Looks or appearance (9%);
- Criminal history (9%);
- National origin (5%);
- Has a Section 8 voucher (5%);
- Homeless (5%).

None of the participants attributed their discrimination experience to their sexual orientation or gender identity, religion, or sex.

Examples of how participants described why they thought they were discriminated against include:

- *"Me dejaron una nota en Mi puerta diciendo que somos ilegales."* "They left a note on my door saying that we are illegal."
- *"Because the house is up for rent and price is right, then they say 'No Section 8' or I have too many kids for the size of house I can afford."*
- *"Tenían apartamentos en renta y cuando pregunté en español me dijeron que no había."* "They had apartments available for rent and when I asked in Spanish, they told me they did not have any available."
- *"Income and my request for a therapy dog for my child."*
- *"We looked at rental apartment complexes before deciding to try to purchase. There were barely any Accessible apartments available, and those that were—the 1<sup>st</sup> floor apartments were charged at a considerably higher rate than 2<sup>nd</sup> or 3<sup>rd</sup> floor apartments. Was told it was because more people wanted 1st floor. Baloney...ALL of my friends that rented wanted higher levels for views of the mountains, and noise from neighbors. They wanted top floors so that they didn't have to hear noise from an above neighbor and street noises would be reduced. And what older complexes labeled an Accessible apartment was a joke. Bedroom/closet/pantry doors wouldn't be wide enough, there would be stairs outside and inside, bathrooms would not have grab bars or big enough for a wheelchair or wide enough doors. There would not be*

*an Accessible path from Apartment to mailboxes or main office or laundry. Did not feel that complexes wanted individuals in wheelchairs living there. Newer or older complexes."*

- *"Racial profiling. I'm Caucasian with biracial kids."*

**Response to discrimination.** When asked what they did about the discrimination, the most common responses include:

- **"Nothing—I wasn't sure what to do"** (77%);
- "Moved/found another place to live" (17%);
- "Called/emailed a lawyer/Legal Aid/ACLU" (13%)
- "Called/emailed housing authority" (13%); and
- "Nothing—I was afraid of being evicted/harassed. (10%)."

One respondent contacted a government agency or elected officials.

## Neighborhood and Community

Survey respondents indicated whether or not they think people like themselves and their family are welcome in all neighborhoods in Westminster, and the extent to which their neighborhood has qualities that indicate it is a healthy neighborhood.

**Welcoming neighborhoods.** As shown in Figure 16, half (54%) of Westminster survey respondents agree or strongly agree with the statement, "I feel that people like me and my family are welcome in all neighborhoods in my city," and this is similar to Adams County respondents (52%). Higher income households, homeowners, and White respondents are most likely to agree that they are welcome in all neighborhoods in Westminster. Those least likely to agree that people like themselves or their family are welcome in all neighborhoods include respondents whose household includes a member with a disability (29% agree), Hispanic respondents (35%), renters (40%), and low income households (43%).

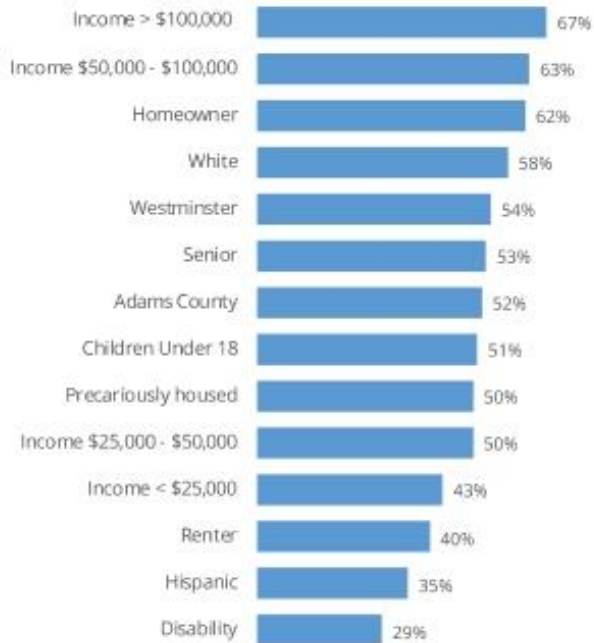
Of those who feel unwelcome, the primary reasons offered include socioeconomic differences (class), race or ethnicity, including biracial couples and children, and differences in values.

- *"Overall cost of living has increased too much, and I feel like with upgrades and gentrification in the area, low income individuals are being pushed out."*
- *"I am a single Caucasian female with bi-racial children."*

- *"We are middle class and the city of Westminster on caters to the low or high income brackets."*

**Figure 16.**  
**"I feel that people like me and my family are welcome in all neighborhoods in my city." (% Strongly Agree/Agree)**

Source:  
 Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.



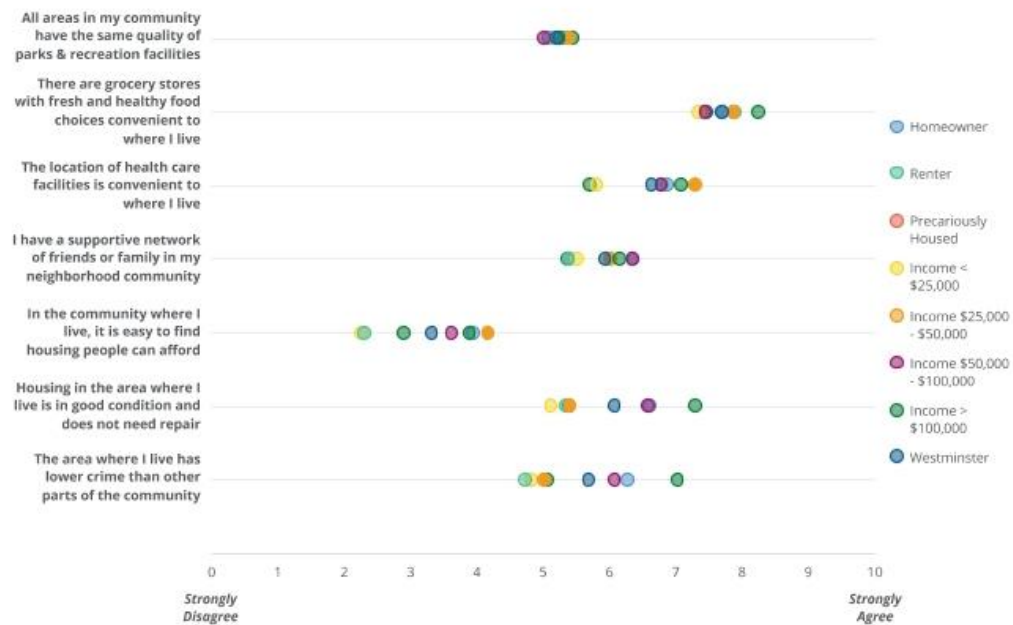
**Healthy neighborhoods.** Healthy neighborhood indicators measured in the resident survey include the relative quality of parks and recreation facilities among neighborhoods, convenient access to grocery stores and health care facilities, having a supportive network of friends or family, neighborhood housing condition, and crime.

Figures 17 and 18 present the extent to which respondents' agree with a series of statements about healthy neighborhood indicators and examines similarities and differences by housing situation, income, and respondent characteristics.

The greatest differences in agreement about access to healthy neighborhood characteristics are found by housing situation and household income (Figure A-17), particularly on indicators related to the ease of finding housing that people can afford, condition of housing, and crime. When considered by respondent characteristics, similar patterns arise, with few meaningful differences related to parks, access to grocery stores, and health care facilities (Figure A-18). Hispanic respondents are least likely to agree that it's easy to find housing that people can afford.

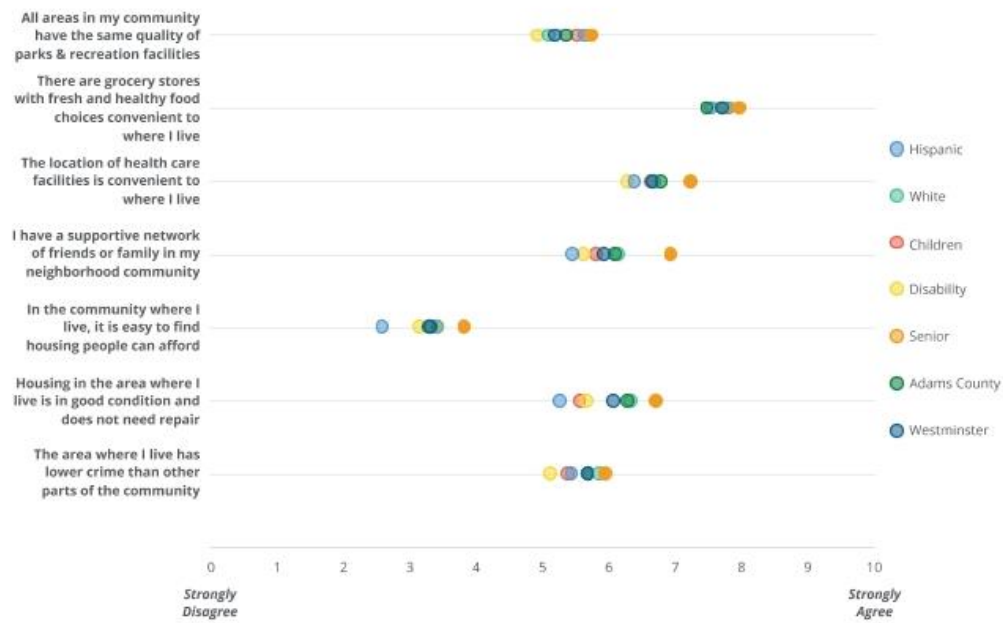
There are no meaningful differences related to the quality of parks across Westminster neighborhoods by housing situation, income, or respondent characteristics.

**Figure 17.**  
**Resident Perspectives on Healthy Neighborhood Indicators, by Housing Situation and Income**



Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.

**Figure 18.**  
**Resident Perspectives on Healthy Neighborhood Indicators, by Selected Respondent Characteristics**



Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.

## Access to Economic Opportunity

This section explores access to economic opportunity, particularly respondents' perceptions of access to quality public schools, job opportunities, and transportation access.

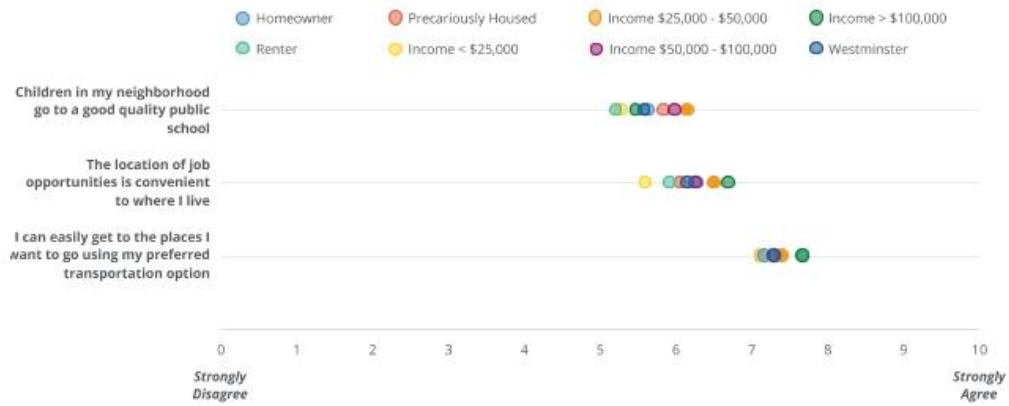
**Indicators of access to economic opportunity.** Survey respondents indicated the extent of their agreement with three indicators of access to economic opportunity in their Westminster neighborhood—"children in my neighborhood go to a good quality public school," "the location of job opportunities is convenient," and, "I can easily get to the places I want to go using my preferred transportation option." Figures 19 and 20 present residents' perspectives on access to economic opportunity by housing situation, income, and respondent characteristics.

Westminster respondents exhibit similar degrees of agreement with the economic opportunity indicators. On average, respondents tend to more strongly agree that they can "easily get to the places I want to go using my preferred transportation option" regardless of housing situation, income, or personal characteristics.

With respect to the location of job opportunities, low income households tend to agree that job locations are convenient but are less likely to agree when compared to higher income households.

While still agreeing, on average, respondents are less likely to agree that children in their neighborhood attend quality public schools, and renters and low income households were least likely to agree. A No meaningful differences are observed by respondent characteristics; income and housing situation tend to capture most differences.

**Figure 19.**  
**Access to Quality Schools, Transportation and Employment, by Housing Situation and Income**



Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.



**Figure 20.**  
**Access to Quality Schools, Transportation and Employment, by Select Respondent Characteristics**



Source: Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.

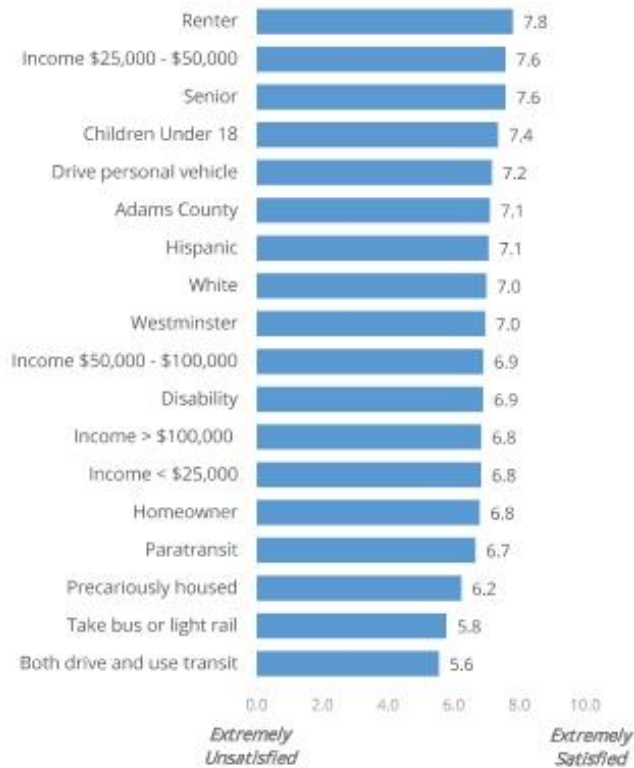
**Transportation modes and satisfaction.** The majority of Westminster residents drive a personal vehicle as the mode of transportation they use most often (88%), followed by getting a ride with someone else (22%), and walking/rolling (19%). Overall, 16 percent report using public transit (i.e., bus, light rail) as their primary transportation mode, and one in 10 (11%) use a combination of public transit and driving a personal vehicle. Less than one in 20 (4%) respondents whose household includes a member with a disability most frequently rely on paratransit services.

As shown in Figure 21, most Westminster respondents are very satisfied with their transportation situation. Those who are least satisfied either rely on public transit or use a combination of public transit and driving a personal vehicle. There are no meaningful differences in transportation satisfaction by protected class status.

**Figure 21.**  
On a scale from 1 to 10, where 1 is "Extremely Unsatisfied" and 10 is "Extremely Satisfied," how satisfied are you with your transportation situation?

Source:

Root Policy Research from the 2020 City of Westminster and Adams County Housing and Community Needs Resident Survey.



The reasons why respondents are unsatisfied with their transportation situation fall into three primary themes—personal vehicles in need or repair or in need of repair in the near future; lack of accessible, efficient bus service connecting needed destinations, and traffic. Examples of why residents are unsatisfied related to vehicle repairs and public transit include:

#### Vehicle needs repair

- "20 year old vehicle that I cannot afford to repair."
- "Because if I didn't have my car I would not be able to get around because of my disabilities where I can't walk enough to get to public transportation."
- "My car is a 91 Buick with numerous issues. I'm very grateful that I have a car that runs however I know it's only a matter of time before it is unable to stay mobile the transmission is about to go."
- "My wheelchair accessible van is 17yrs old and has numerous problems. Need a newer accessible van before this one completely quits on me. I maintain it, get it

*served but it won't last forever. Financial problems prevent us from being able to get a new to me one at this time. Trying to repair credit but keep getting hit with problems. Can't seem to get ahead and everything costs so much."*

**Public transit—access, accessibility, efficiency, and routes**

- *"RTD has significant issues these days, including rerouting the 128."*
- *"There is not a bus that takes you from south Westminster to Broomfield without walking for miles."*
- *"I have to drive to a park and ride to get transit. Walking on streets outside of my neighborhood is unsafe—people drive too fast, pedestrian crossings are not protected or signalized, and sidewalks are not complete."*
- *"I need my own car because the bus takes too long to get everywhere I need to be in one day."*
- *"Many bus stops closest to my house have been removed the last few months. One route completely shifted away. The rail station nearest my house is close and reliable yet only runs every hour much of the time."*
- *"If you need to travel east west and north south that is a long ride. The travel time and wait time for buses is too long."*

## APPENDIX F. FAIR HOUSING ACTION PLAN

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### Fair Housing Action Plan

The recommended Fair Housing Action Plan (FHAP) for the City follows. These action items focus on what the City can reasonably do to address the impediments to and affirmatively further fair housing (AFFH), given its staff and financial capacity. Other public entities, nonprofits, and private sector partners can play a role and buttress the City's AFFH activities. The FHAP is contained in the matrix on the following page, which links the action items to the identified impediments, potential partners, timeline, and outcomes.

Fair Housing Actions	Issues/Impediments	Responsible Party	Metrics and Milestones
Complete update to the City's Comprehensive Plan. Updating the Comprehensive Plan on a regular schedule promotes the inclusion of community input in the development regulations and built form in their community as well as keeping up to date with best practices in land use planning that can often promote affordability and eliminate barriers to housing development.	Shortage of affordable, accessible housing  Limited zoning code and land use regulations	City of Westminster	Complete update to the City's Comprehensive Plan in 2021
Regularly identify and inventory City-owned land available to facilitate investment and development of affordable housing both for sale and for rent.	Shortage of affordable, accessible housing  Barriers to homeownership	City of Westminster	Identify housing development partners to utilize City-owned land for affordable housing  Regularly review and update the inventory of City-owned land that can leverage new affordable housing development
Ongoing application of HOME funds to provide Tenant Based Rental Assistance.	Shortage of affordable, accessible housing	Adams County HOME Consortium, City of Westminster, Maiker Housing Partners,	Participating municipalities worked with Maiker Housing Partners to design and implement a TBRA

		Brighton Housing Authority (BHA)	program administered by Maiker and BHA.
Provide grant funding to low-and moderate-income (LMI) homeowners to address emergency and essential home repairs and prevent displacement.	Lack of resources to address poor housing conditions  Shortage of affordable, accessible housing	City of Westminster, Brothers Redevelopment, Inc., Foothills Regional Housing	Market EEHR program to qualified LMI homeowners.
Provide grant funding to multi-family property owners to preserve and rehabilitate existing affordable housing supply in the City.	Lack of resources to address poor housing conditions  Shortage of affordable, accessible housing	City of Westminster, non-profit housing providers, Growing Home, Maiker Housing Partners, Brothers Redevelopment, Inc., Foothills Regional Housing	Work closely with local housing authorities and affordable housing landlords to identify opportunities to improve and preserve existing affordable housing
Promote housing programs, initiatives and opportunities in media and channels that are accessible to our LEP residents.	Disparate access to opportunity	City of Westminster, affordable housing partners, CRHDC	Promote and support CRHDC Homeowner classes for LMI and LEP residents.  Follow the City's Language Access Plan and Citizen Participation Plan to provide information to residents, making strategic efforts to reach underrepresented communities

## Grantee SF-424's and Certification(s)

OMB Number: 4340-0004  
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424			
*1. Type of Submission: <input type="checkbox"/> Preproposal <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		*2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
		* If Revision, select appropriate item(s): <input type="checkbox"/> Other (Specify): <input type="checkbox"/> Other (Specify):	
*3. Date Received:		4. Applicant Identifier:	
09/01/21			
5a. Federal Entity Identifier:		5b. Federal Award Identifier:	
090101		B-20-NC-000010	
State Use Only:			
6. Date Received by State:		7. State Application Identifier:	
8. APPLICANT INFORMATION:			
* a. Legal Name: City of Westminster			
* b. Employer/Taxpayer Identification Number (EIN/TIN):		* c. Organizational DUNS:	
84-6000726		0832039840832	
d. Address:			
* Street1:	1800 N. 52nd Avenue		
* Street2:			
* City:	Westminster		
* County/Parish:			
* State:	CO: Colorado		
* Province:			
* Country:	USA: UNITED STATES		
* Zip / Postal Code:	80011-6087		
e. Organizational Unit:			
Department Name:		Division Name:	
Economic Development		Economic Development	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix:	Mr.	* First Name:	John
Middle Name:			
* Last Name:	Sullivan		
Suffix:			
Title: Economic Policy & Development Manager			
Organizational Affiliation:			
City of Westminster			
* Telephone Number:	303-650-2105	Fax Number:	303-786-2544
* Email:	jsullivan@cityofwestminster.co		



Application for Federal Assistance SF-424			
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="City or Township Government"/>			
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>			
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>			
<b>* Other (specify):</b> <input type="text"/>			
<b>* 10. Name of Federal Agency:</b> <input type="text" value="U.S. Department of Housing and Urban Development"/>			
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14-218"/>			
<b>CFDA Title:</b> <input type="text" value="Community Development Block Grant Program"/>			
<b>* 12. Funding Opportunity Number:</b> <input type="text"/>			
<b>* Title:</b> <input type="text"/>			
<b>13. Competition Identification Number:</b> <input type="text"/>			
<b>Title:</b> <input type="text"/>			
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text" value="City of Westminster, Adams &amp; Jefferson Counties"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>			
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="2020 Community Development Block Grant Program - The funds provide funding for COVID related activities, administration costs, Emergency and Resettlement Repair Programs, Streetscapes &amp; Infrastructure."/>			
<b>Attach supporting documents as specified in agency instructions.</b> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>			

<b>Application for Federal Assistance SF-424</b>	
<b>16. Congressional Districts Of:</b>	
* a. Applicant: <input type="text" value="Dist T"/>	* b. Program/Project: <input type="text" value="Dist"/>
Attach an additional list of Program/Project Congressional Districts if needed. <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>17. Proposed Project:</b>	
* a. Start Date: <input type="text" value="07/01/2020"/>	* b. End Date: <input type="text" value="06/30/2021"/>
<b>18. Estimated Funding (\$):</b>	
* a. Federal	<input type="text" value="631,806.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="631,806.00"/>
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b> <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . <input checked="" type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)</b> <input checked="" type="checkbox"/> ** I AGREE <small>** The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
<b>Authorized Representative:</b>	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Donald"/>
Middle Name: <input type="text" value="M."/>	
* Last Name: <input type="text" value="Tripp"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="City Manager, City of Westminster"/>	
* Telephone Number: <input type="text" value="303-658-2010"/>	Fax Number: <input type="text" value="303-706-3921"/>
* Email: <input type="text" value="dtripp@cityofwestminster.us"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="12/14/2020"/>

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing --** The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan --** It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.


**Anti-Lobbying --** To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction --** The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan --** The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3 --** It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

  
Signature/Authorized Official 12/14/2020

### Specific CDBG Certifications

The Entitlement Community certifies that:

**Citizen Participation --** It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan --** Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan --** It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

**Use of Funds --** It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. Overall Benefit. The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2020, (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.  
The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force --** It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

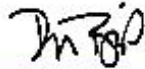
jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

**Compliance With Anti-discrimination laws** – The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000c), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Lead-Based Paint** – Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

**Compliance with Laws** – It will comply with applicable laws.



Signature/Authorized Official

12/14/2020

Date

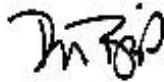
City Manager

Title

**OPTIONAL CERTIFICATION  
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.



Signature/Authorized Official

12/14/2020

Date

City Manager

Title



### Specific HOME Certifications

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

**Eligible Activities and Costs** -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

**Appropriate Financial Assistance** -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



Signature/Authorized Official

12/14/2020

Date

City Manager

Title

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING:

#### A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.



# ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4010-0036  
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

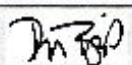
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 et seq. and 290 et seq.), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 4240 (Rev. 7-97)  
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1506 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11736; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

<b>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</b>	<b>TITLE</b>
	City Manager
<b>APPLICANT ORGANIZATION</b>	<b>DATE SUBMITTED</b>
City of Westminster	12/16/2020

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## Appendix - Alternate/Local Data Sources

1	<b>Data Source Name</b> 2017 ACS 1-year Estimates
	<b>List the name of the organization or individual who originated the data set.</b> U.S. Census
	<b>Provide a brief summary of the data set.</b> The American Community Survey (ACS) helps local officials, community leaders, and businesses understand the changes taking place in their communities. It is the premier source for detailed population and housing information about our nation.
	<b>What was the purpose for developing this data set?</b> The American Community Survey (ACS) helps local officials, community leaders, and businesses understand the changes taking place in their communities. It is the premier source for detailed population and housing information about our nation.
	<b>Provide the year (and optionally month, or month and day) for when the data was collected.</b> 2017
	<b>Briefly describe the methodology for the data collection.</b> Random sample survey.
	<b>Describe the total population from which the sample was taken.</b> The U.S. Population
	<b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b> The U.S. Population
	<b>2</b>
<b>Data Source Name</b> U.S. Census Bureau Quarterly Workforce Indicators	
<b>List the name of the organization or individual who originated the data set.</b> U.S. Census Bureau Quarterly Workforce Indicators (QWI), 4th Quarter 2017	

<p><b>Provide a brief summary of the data set.</b></p> <p>he QWI are a set of 32 economic indicators including employment, job creation/destruction, wages, hires, and other measures of employment flows. The QWI are reported based on detailed firm characteristics (geography, industry, age, size) and worker demographics (sex, age, education, race, ethnicity) and are available tabulated to national*, state, metropolitan/micropolitan areas, county, and workforce investment areas (WIA). The QWI are unique in their ability to track both firm and worker characteristics over time – enabling analyses such as a longitudinal look at wages by worker sex and age across counties, ranking job creation rates of young firms across NAICS industry groups, and comparing hiring levels by worker race and education levels across a selection of metropolitan areas.</p>
<p><b>What was the purpose for developing this data set?</b></p> <p>he QWI are a set of 32 economic indicators including employment, job creation/destruction, wages, hires, and other measures of employment flows. The QWI are reported based on detailed firm characteristics (geography, industry, age, size) and worker demographics (sex, age, education, race, ethnicity) and are available tabulated to national*, state, metropolitan/micropolitan areas, county, and workforce investment areas (WIA). The QWI are unique in their ability to track both firm and worker characteristics over time – enabling analyses such as a longitudinal look at wages by worker sex and age across counties, ranking job creation rates of young firms across NAICS industry groups, and comparing hiring levels by worker race and education levels across a selection of metropolitan areas.</p>
<p><b>Provide the year (and optionally month, or month and day) for when the data was collected.</b></p> <p>2017 4th Quarter</p>
<p><b>Briefly describe the methodology for the data collection.</b></p> <p>he QWI are a set of 32 economic indicators including employment, job creation/destruction, wages, hires, and other measures of employment flows. The QWI are reported based on detailed firm characteristics (geography, industry, age, size) and worker demographics (sex, age, education, race, ethnicity) and are available tabulated to national*, state, metropolitan/micropolitan areas, county, and workforce investment areas (WIA). The QWI are unique in their ability to track both firm and worker characteristics over time – enabling analyses such as a longitudinal look at wages by worker sex and age across counties, ranking job creation rates of young firms across NAICS industry groups, and comparing hiring levels by worker race and education levels across a selection of metropolitan areas.</p>
<p><b>Describe the total population from which the sample was taken.</b></p> <p>The U.S. Population</p>
<p><b>Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.</b></p> <p>The U.S. Population</p>