



CITY OF WESTMINSTER

DRAFT 2022
Consolidated
Annual Performance
and Evaluation
Report

December 2023



WESTMINSTER
COLORADO

CR-05 - Goals and Outcomes

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

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

This Consolidated Annual Performance Evaluation Report (CAPER) covers the City's 2022 CDBG program year from October 1, 2022, through September 30, 2023.

Background:

The 2022 Annual Action Plan (AAP) was filed and accepted by the U.S. Department of Housing and Urban Development (HUD) in August 2022. Staff worked with residents, internal stakeholders and, regional and local partners to identify areas for both continued investment and new application of Community Development Block Grant (CDBG) funding for the program year. The City received an initial allocation of \$585,031 from the U.S. Department of Housing and Urban Development in late 2022. During the second week of August 2022, the Region 8 HUD director notified Westminster that the City was eligible to receive an added \$24,692 in redistributed CDBG funds. Additional funding was added to the base 2022 allocation bringing the total 2022 funding to \$609,723.

Three overarching goals were identified during the development of the Consolidated Plan in 2020 that guide the City's CDBG investments during the five-year planning cycle. The goals are broken out as 1) Administration, 2) Preserve and Expand Affordable Housing, and 3) Infrastructure and Streetscape Improvements.

Changes to the City's projects at the end of 2022 prompted multiple substantial amendments. During the Council acceptance of the AAP, City Council directed that a property originally acquired with Section 108 loan proceeds and repaid using the City's CDBG should be employed as a community open-air event space. This change of use required a substantial amendment to redesignate the national objective for the site from Housing to meeting a Low-and Moderate Area (LMA) Benefit.

Additionally, the City had been asked to contribute \$100,000 of CDBG funds in support of a regional housing navigation center that would provide 25 beds and days services for Westminster's unhoused residents. HUD staff opined that the City was able to use funds to support the regional service and should also amend the 2020-2024 Consolidated Plan to create a new goal for Homelessness Services.

Acceptance of the \$24,692 of redistributed funds also required a substantial amendment for receipt of new funds into the program. HUD provided guidance states:

In this situation, citizens must be notified of the amount of CDBG funds received, including any additional funds it may receive from a reallocation of CDBG funds. The regulation at 91.220(c)(1) states in part: (1) Federal resources. The consolidated plan must provide a concise summary of the federal resources (including grant funds and program income) expected to be made available. In addition, the language at 91.220(l)(1)(i) states: A jurisdiction must describe activities planned with respect to all CDBG funds expected to be available during the program year, except that an amount generally not to exceed 10 percent of such total available CDBG funds may be excluded from the funds for which eligible activities are described if it has been identified for the contingency of cost overruns. The receipt of additional CDBG funds will require a substantial amendment to notify citizens of the additional amount of CDBG funds received and how those funds will be used. The additional funds may be used for a new activity or added to a previously identified activity.

Grantees should consider making a substantial amendment to its Citizen Participation Plan (CPP) at the time of completing the substantial amendment for the reallocation, to ensure compliance with 91.220(c)(1) and 91.220(l)(1)(i), essentially making it clear that the availability of reallocated funds of any amount triggers a substantial amendment.

The four substantial amendments were performed in accordance with the City's CPP and submitted to HUD. HUD acknowledged receipt in April 2023.

CDBG-CV:

HUD allocated \$873,207 in Community Development Block Grant – Covid 19 (CDBG-CV) emergency response funding to the City between April 2020 and September 2020. These funds were designated for critical response support to address the impacts of Covid-19 on the community and included specific instructions for tracking and monitoring to ensure the fund awards did not duplicate other federal relief. The balance of CDBG-CV funds were expended before the federal deadline of August 2023. The final accomplishments for the application of CDBG-CV funds are included in this report.

The following CDBG projects provided the following outcomes:

The Preserve and Expand Affordable Housing goal had accomplishments under two projects:

1. The Emergency and Essential Home Repair program (EEHR) served 25 households using PY 2019 and PY 2020 funds.
2. The Multi-family Housing Preservation grants program (Housing LIFT) was implemented with support of a consultant familiar with U. S. Department of Housing and Urban Development law and rules to guide development work performed with CDBG funds. Two non-profit affordable housing owners were selected, and their developer contracts were completed in April 2023. To-date, \$650,000 has been expended on the preservation work. Both projects experienced contracting and weather delays and are still finishing up their redevelopment work.

The LMA Community Event Space was delayed through the summer to complete an environmental assessment. The full assessment was completed in August 2023. The project will be implemented during the first Quarter of 2024 with completion of a Request for Proposals (RFP) for a community event operator and the completion of site preparation that will provide landscaping, fencing and set up the site for community events, food trucks, and farmers market use. Outcomes for this project will be reported when the project is completed, likely during the next program year.

The City’s partnership with regional partners creating a homeless service – housing navigation center encountered setbacks during the year and the proposed \$100,000 investment is being considered for reprogramming. Staff anticipates that this will require a substantial amendment process in early 2024.

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

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

Goal	Category	Source	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration	Administration	CDBG	Other	Other	0	0	0.00%	1	1	100.00%
Fair Housing Action Plan	Affordable Housing	CDBG	Other	Other	0	0	0.00%			

Homeless Resident Support	Homeless	CDBG	Overnight/Emergency Shelter/Transitional Housing Beds added	Beds	0	0	0.00%	14	0	0.00%
Homeless Resident Support	Homeless	CDBG	Homelessness Prevention	Persons Assisted	0	64	100.00%	14	38	271.43%
Infrastructure and Streetscape Improvements	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	400	400	100.00%			
LMA Benefitting Community Event Space	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0	0.00%	200	0	0.00%
Preserve and Expand Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG	Rental units constructed	Household Housing Unit	200	0	0.00%			
Preserve and Expand Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG	Rental units rehabilitated	Household Housing Unit	25	0	0.00%	100	0	0.00%
Preserve and Expand Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	25	62	248.00%	30	25	83.33%

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

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

From April 2020 through the end of the year, the City was awarded \$873,207 of CDBG-CV funding to address economic and housing impacts directly attributed to the pandemic. These funds were accepted by the City and applied to our CDBG program through a Substantial Amendment to the City’s 2019 Annual Action Plan (AAP). In March of 2022, City Council assigned the remaining \$43,703 of CDBG-CV funds to local housing nonprofit partner Almost Home to assist Westminster residents still experiencing Covid-19 impacts with rent and mortgage assistance. Almost Home was successful in utilizing the balance of funds and the project was closed out in advance of the August 2023 program deadline.

Given the required staff effort to initiate and establish the CDBG-CV projects, the implementation of some 2020 AAP projects was delayed. During the 2021 program year, staff initiated the multi-family preservation project and completed the pedestrian safety project on Hooker Street. As homeowner rehab work also was delayed by pandemic restrictions, the EEHR program has been recovering from a work stoppage between March 2020 and summer of 2021 and exceeded projected production this past year. Given continued supply chain issues and staffing challenges, 2020-2024 Consolidated plan project implementation did not move as quickly as originally planned.

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CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

	CDBG
White	57
Black or African American	5
Asian	1
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	63
Hispanic	17
Not Hispanic	46

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

Narrative

Please note that the data in Table 2 is broken out by individuals served.

The table does not include individuals who report their race as “other” or “multi-racial.” There were none in the reported data.

Additional minority resident assistance and engagement includes:

1. The EEHR Program served 25 households using the balance of PY 2019 and PY 2020 funds.
2. Almost Home served 38 residents during 2022.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	609,723	915,883

Table 3 - Resources Made Available

Narrative

Funds expended during the 2022 program year include prior year CDBG funds previously allocated to 2020-2024 Consolidated Plan projects.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City-Wide	100	100	Citywide low/mod, eligible

Table 4 – Identify the geographic distribution and location of investments

Narrative

20% of the PY2022 CDBG funding was budgeted for administration, and the balance of funds was applied to projects that were in Historic Westminster, Harris Park, and City-wide.

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Leveraging

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

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

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

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

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

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

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

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of homeless households to be provided affordable housing units	0	0
Number of non-homeless households to be provided affordable housing units	130	25
Number of special-needs households to be provided affordable housing units	0	0
Total	130	25

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through rental assistance	0	0
Number of households supported through the production of new units	0	0
Number of households supported through the rehab of existing units	130	25
Number of households supported through the acquisition of existing units	0	0
Total	130	25

Table 6 – Number of Households Supported

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

The activities that support these goals are broken out by Homeowner Rehabilitated (EEHR) and Rental Units Rehabilitated (Housing LIFT). The activities project completion of 100 Rental Housing Units and 30 Homeowner Household Housing Units.

Goals completed:

Homeowner Housing Units: 25 owner-occupied households assisted

1252 - Emergency and Essential Home Repair Program - Jefferson County PHA (8)

1262 - Emergency and Essential Home Repair Program - Brothers Redevelopment, Inc (17)

1263 - Emergency and Essential Home Repair Program - Foothills Regional Housing (0) None reported yet

Housing LIFT Rental Units: 0

1266 - Housing Lift - East Bay Senior Housing Brothers Redevelopment (0) None reported yet, activity is still open.

1267 - Housing Lift - Westchester Apts. - Maiker Housing Partners (0) None reported yet, activity is still open.

These two contracts will be completed during the first half of 2024 and will be reported in the 2023 CAPER.

A substantial amendment filed during PY22 added Homeless Services as a CDBG goal to the 2020-2024 Consolidated Plan. This was requested by HUD to streamline reporting tied to the Regional Housing Navigation Services project.

Staff determined to establish a grant program and provide needed CDBG funds to ensure the properties are healthy and safe, and able to continue to serve LMI residents for decades to come. Since 2020, the launch of the multi-family housing preservation grant program was placed on hold while the non-profits analyzed the property needs and evaluated access to general contractors and construction support that was limited during the pandemic. The project has been implemented under the title Housing LIFT and the two selected property owners are now under construction. The projects will preserve 100 units of multifamily and senior housing for Westminster residents.

Discuss how these outcomes will impact future annual action plans.

The City's past CDBG-funded projects have focused on community needs, such as aging housing stock and infrastructure. Past projects also include development of a local senior center, streetscape improvements, and supplementing efforts to cultivate a historic arts district in a low- and moderate-income neighborhood. The activities and projects proposed in the 2022 AAP and the goals for the five-year planning period continue to promote the most efficient and effective use of CDBG funds, while also investing in neighborhood improvements 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 goals and objectives for the 2020-2024 Consolidated Plan. Goals and objectives were written to be broad enough to include a wide array of projects and activities.

City staff consults with and engages residents and regional partners to coordinate project planning and benchmark realized benefits from CDBG investments. During the work to set up the City's 2022 Annual Action Plan (AAP), City Council directed staff to work with the Harris Park residents to evaluate

alternative uses for the property held at West 73rd Avenue and Lowell Boulevard. Staff convened four neighborhood meetings, involving over 80 residents. Spanish translation of meeting materials and an interpreter was provided, allowing over a dozen local Latino residents to participate in the planning discussions. The workgroup participants identified the opportunity to landscape the now cleaned parcel for use as an open-air community event space, where grocery trucks, farmers markets, art festivals and local swap meets may be held. The City performed a substantial amendment and change of use for the property in December 2022.

Both residents and local non-profit leaders have stepped up to help program the site to benefit area residents. The City will go out to bid to select a site-operator to work with area residents and local businesses to program the use of the site. Staff will reconvene the residents to overview the upcoming site planning process and implement a community space by May 2024.

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

Number of Households Served	CDBG Actual
Extremely Low-income	15
Low-income	2
Moderate-income	8
Total	25

Table 7 – Number of Households Served

Narrative Information

Homeowner Housing Units: 25 owner-occupied households assisted

1252 - Emergency and Essential Home Repair Program - Jefferson County PHA (8)

1262 - Emergency and Essential Home Repair Program - Brothers Redevelopment, Inc (17)

During PY 2022 the EEHR program served 25 households, of which 10 were female head of household, and most of the residents served were elderly. Fifteen (15) of the households served qualified as Extremely Low-Income, two qualified as Low-Income, and eight were Moderate-Income.

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

Regional Housing (formerly the Jefferson County Housing Authority) handyman program serves City residents in Jefferson County.

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

Recent public notice of the availability of assistance through EEHR has prompted a significant increase in applications. CDBG staff and the staff at the City's two subrecipient contractors are working to devise a process to accept and process a higher level of applications than has been experienced since the 2020 slow-down. The City is evaluating a policy update that will include an increase to the individual grant amount. This information will be covered in the 2023 CAPER.

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

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

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

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

During PY2022, the Navigators held 3 Department of Motor Vehicle events with 101 people receiving identification needed to apply for benefits along with 11 resource fairs where 204 people were able to directly connect to an average of seven service providers. In addition, they permanently housed 21 households and provided more than 3,500 hotel stays as non-congregant shelter and/or bridge housing. The City also provides move-in assistance, rental assistance and -- when needed -- security deposits to assist people with vouchers who do not have enough saved up to remove that last barrier to housing. In addition, during PY2022, the Navigators provided over 60 case management sessions, allowing them to connect people to benefits including food, medical insurance and care, mental health supports, substance use treatments, and employment.

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

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

Addressing the emergency shelter and transitional housing needs of homeless persons

The City provides hotel stays for people experiencing homelessness as well as works closely with other service providers to connect individuals and families to available transitional housing. The City's Homeless Navigators have resources to provide severe weather sheltering for individuals and families

who are found out-of-doors on severe weather nights. Severe weather is defined as nights with temperatures below freezing and/or with precipitation and freezing temperatures. With the support of the City's homeless assistance staff team, the City has established partnerships with three area motels to provide rooms for unhoused residents discovered outdoors during severe weather. The City also refers PEH to Adams County's emergency weather shelters in hotels or the Severe Weather Shelter Network of non-congregant shelters as part of regional partnerships.

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

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

The City actively advertised the Emergency Rental Assistance Funds available to prevent evictions from COVID-19. The City also participates in funding with all the jurisdictions in Adams County and the City and County of Broomfield, free tenant-landlord legal assistance for low-income community members.

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

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

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

Helping homeless persons (especially chronically homeless individuals and families, families

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

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

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

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

Actions taken to address the needs of public housing

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

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

The preservation of affordable multi-family housing program, Housing LIFT was implemented during PY22 with two multi-family property applicants. One of these is owned and managed by Maiker Housing Partners. Maiker received a \$500,000 grant to perform significant rehabilitation and upgrades. Foothills Regional Housing has asked to apply for the next round of Housing LIFT grant funds to perform a similar level of rehab on a property they operate at 88th and Sheridan Blvd.

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

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

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

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

Actions taken to encourage public housing residents to become more involved in

management and participate in homeownership

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

During PY2022, Maiker expanded their staffing to include three full-time Community Navigators and three Resource Navigators who will support a Community Council comprised of ambassadors from each managed property. The Community Council meets quarterly to advise management and work collaboratively.

Also, in PY2022, the community navigators branched out of the PHA properties to work with residents throughout Historic Westminster. Growing Home, an area non-profit providing services and resources to strengthen LMI families, provided additional staff support to increase access for navigators to meet and network while assisting local families in need of added services. The City participated in two community forums to provide the navigators with information to help residents with landlord-tenant and rental assistance questions.

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

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

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

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

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

Actions taken to provide assistance to troubled PHAs

The City does not have any troubled PSAs.

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

Actions taken to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. 91.220 (j); 91.320 (i)

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

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

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

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

At the time of this report, the City is nearing completion of an updated Housing Needs Assessment. This information will be used to inform policy and consequent code updates in the coming year.

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

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

Additionally, the City provides targeted assistance for residents who are unable to pay their water bill. The City provides both temporary payment assistance of up to \$180 and a Hardship application process for individuals or families who have experienced loss of income or due to a medical emergency.

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

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

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

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

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

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

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

City Parks, Recreation and Library (PRL) staff have been working with a parent council in Historic Westminster since 2016 in the implementation of a parks planning process. The ongoing connection to the primarily Spanish-speaking parent council has created additional access to community resources and

opportunities. This initial work group has now evolved to include a larger group of networked, Spanish-speaking household who participate in many city and local-non-profit planning processes. This year, the community navigator network focused on training and information updates to assist low- and- moderate income residents.

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

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

During PY 2020, the City implemented a strategic hiring freeze in response to the Covid-19 pandemic. As a result, the City's Economic Development Department had severe staff shortages during PY 2020 and into PY 2021. PY2021 work planning mainly focused on the completion and monitoring for CDBG-CV funded activities. Given continued staffing shortages during PY2021, CDBG work programs have recently resumed focus on 2020-2024 Con Plan implementation and AAP projects. The Economic Development Department is currently in the process of recruiting and staffing vacant positions to effectively implement the CDBG programs and activities as well as support the development of affordable housing in the City.

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

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

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

The City's updated Housing Needs Assessment (HNA) is in draft review and will be accepted by City Council in early 2024. The HNA will be used to inform policy and guide development to address identified gaps and support the City's affordable housing goals.

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

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

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

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

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

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

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

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

The City is included in the updated Analysis of Impediments (AI) plan created for the Adams County HOME consortium. This AI plan was filed with the Adams County 2020-2024 Consolidated Plan.

CR-40 - Monitoring 91.220 and 91.230

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

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

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

Project monitoring is also performed in the contract management process to ensure grantees are performing as required by the subrecipient agreements and other contracting documents. Both Economic Development staff and the City's Finance and Grants Coordinator review materials submitted by subrecipients and developer-grantees when invoices are presented and match performance to the contracted requirements. The City's CDBG program was included in the City's 2021 external audit performed in February – April of 2022. The external auditor had no findings for the CDBG fiscal management and complimented staff in the final report delivered to the City Council.

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

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

The CAPER was posted to the City’s CDBG web page on December 4, 2023. Information regarding how to access and provide input on the report was published in the weekly newspaper of record, distributed to area stakeholders enrolled in an email list, and released via the City’s Social Media on Facebook and X (formerly Twitter.)

Add Citizen Outreach documentation when complete

CR-45 - CDBG 91.520(c)

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

The 2022 CAPER was provided to the public for review as required by the current Citizen Participation Plan (CPP) filed and accepted by HUD with the City’s 2020-2024 Consolidated Plan.

The DRAFT 2022 CAPER was posted on Monday, December 4, 2023, through December 20, 2023. Regional partners, city residents and businesses were informed of the opportunity to review and comment via email and social media posts.

A copy of the City’s published newspaper notice and affidavit, as well as all social media posts are included in the attached Citizen Participation appendix.

PLACEHOLDER: No comments or inquiries regarding the CAPER were received by the time of this report filing.

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

N/A

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

N/A

DRAFT

CR-58 - Section 3

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

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

Table 8 – Total Labor Hours

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

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

There were no activities that met the Section 3 reporting threshold.

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