



**ADAMS COUNTY**  
**COLORADO**  
BOARD OF COUNTY COMMISSIONERS

Eva J. Henry - District #1  
Charles "Chaz" Tedesco - District #2  
Emma Pinter - District #3  
Steve O'Dorisio - District #4  
Mary Hodge - District #5

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**STUDY SESSION AGENDA**  
**TUESDAY**  
**June 18, 2019**

*ALL TIMES LISTED ON THIS AGENDA ARE SUBJECT TO CHANGE*

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<b>1:00 P.M.</b>	<b>ATTENDEE(S):</b>	<b>Adam Burg / Eliza Schultz / Elisabeth Rosen</b>
	<b>ITEM:</b>	<b>State Lobbyists Update</b>
<b>1:30 P.M.</b>	<b>ATTENDEE(S):</b>	<b>Jill Jennings Golich / Melissa Scheere / Richard Reed</b>
	<b>ITEM:</b>	<b>2019 Annual Action Plan and Neighborhood Stabilization Program Action Plan Amendment</b>
<b>2:00 P.M.</b>	<b>ATTENDEE(S):</b>	<b>Raymond Gonzales</b>
	<b>ITEM:</b>	<b>Administrative Item Review / Commissioners Communication</b>
<b>2:30 P.M.</b>	<b>ATTENDEE(S):</b>	<b>Heidi Miller</b>
	<b>ITEM:</b>	<b>Executive Session Pursuant to C.R.S. 24-6-402(4)(b) for the Purpose of Receiving Legal Advice Regarding Oil and Gas Regulation</b>

(AND SUCH OTHER MATTERS OF PUBLIC BUSINESS WHICH MAY ARISE)

\*\*\*AGENDA IS SUBJECT TO CHANGE\*\*\*



## STUDY SESSION AGENDA ITEM

<b>DATE:</b> June 18, 2019
<b>SUBJECT:</b> 2019 Annual Action Plan (AAP) and Neighborhood Stabilization Program (NSP) Action Plan Amendment
<b>FROM:</b> Jill Jennings Golich, Community & Economic Development Director
<b>AGENCY/DEPARTMENT:</b> Community & Economic Development
<b>ATTENDEES:</b> Jill Jennings Golich, Melissa Scheere, and Richard Reed
<b>PURPOSE OF ITEM:</b> Discussion of the County's 2019 AAP and NSP Action Plan amendment, as required by the US Department of Housing and Urban Development (HUD) in order to receive and expend federal funds
<b>STAFF RECOMMENDATION:</b> Approval to proceed with 2019 AAP and NSP Action Plan amendment for final approval at the July 23, 2019 public hearing and subsequent submittal to HUD

### **BACKGROUND:**

#### **2019 AAP**

Adams County, as the Grantee of HUD funds, is responsible for the submission of a Consolidated Plan (Con Plan) that outlines the community needs, establishes goals and priorities of how funds will be targeted/distributed and submission of subsequent annual plans. The Con Plan, covering from 2015 – 2019, was approved by the Board in May 2015. The 2019 AAP is the fifth, and final, stand-alone annual plan under the 2015 - 2019 Con Plan.

The County has developed the 2019 AAP as a HUD requirement to qualify for Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funding for Program Year 2019 (July 1, 2019 to June 30, 2020). The AAP is an annual planning document that encompasses the following objectives:

1. Adopts specific actions in accordance with the 2015-2019 Con Plan;
2. Sets program milestones;
3. Identifies projects to address community and housing needs;
4. Allows for the opportunity to reallocate and reprogram funds from previous years; and
5. Allows an opportunity for the public to provide input on the use of funds.

The County can only submit its 2019 AAP after it receives its official allocation letter from HUD, Board approval after the required thirty (30) day public comment period, and HUD required attachments are signed by the Chair. The AAP will then be submitted to HUD, who has forty-five (45) days to review and accept it. Once accepted, HUD will enter into separate CDBG/HOME agreements with the County in order to receive funding.

The purpose of the CDBG program is to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for persons who are considered low-to-moderate income. At a minimum, seventy percent (70%) of CDBG funds must be used for activities that benefit low-to-moderate income individuals or families. Funding is allocated to the County's Urban County members, which include the cities of Brighton, Federal Heights, and Northglenn, Town of Bennett, and unincorporated Adams County. Adams County's 2019 CDBG allocation is \$1,364,927 and anticipates \$308,000 in program income, totaling \$1,672,927.

The purpose of the HOME program is to: expand the supply of permanent, decent, safe, sanitary, and affordable housing; design and implement strategies for achieving an adequate supply of permanent, decent, safe, sanitary, and affordable housing; and provide participating jurisdictions the various forms of federal housing assistance for serving very low- and low-income Americans. HOME funds are allocated to the HOME Consortia members, which include the Urban County areas, and the cities of Thornton and Westminster. Adams County's 2019 HOME allocation is \$949,905 and has \$923,656 in program income and prior year resources, totaling \$1,873,561.

In addition, fifteen percent (15%) of the total 2019 HOME allocation must be awarded to a Community Housing Development Organization (CHDO). An additional five percent (5%) is allowable to be allocated to the CHDO project in the form of CHDO Operating Costs. These operating costs assist the CHDO in carrying out CHDO activities, as well as build organizational capacity.

### **NSP Action Plan Amendment**

To qualify for Neighborhood Stabilization Program (NSP) funds, Adams County was required by HUD to develop and submitted an action plan for NSP1, established by Section 2301(b) of the Housing and Economic Recovery Act of 2008, and a substantial amendment to the action plan for NSP3, authorized by Section 1497 of the Wall Street Reform and Consumer Protection Act of 2010. The NSP action plan demonstrates how NSP funds will be spent to address community needs in distressed areas of Adams County.

Community Resources and Housing Development Corp. (CRHDC) entered into a contract with Adams County in 2012 to use NSP funding for acquisition and rehabilitation of single family homes during the foreclosure crisis. The homes were subsequently sold to qualified low-to-moderate income homebuyers. At its peak, funding continued to revolve back to CRHDC allowing for acquisition and rehabilitation of more homes (i.e., program income). As the market began to improve, it became more difficult to acquire homes that qualify under NSP. NSP requires properties be foreclosed, abandoned, or in-fill vacant properties and within a qualifying census tract. As a result, there is a remaining \$1,413,820 in Adams County NSP funding and

program income. Due to the improvement of the housing market and economy and program stagnation, HUD has requested that all grantees with remaining NSP funds closeout NSP as soon as possible. HUD has not provided a specific deadline to closeout NSP.

CRHDC has proposed to use the remaining NSP funds on Harris Park Apartments. The development qualifies for NSP due to the property being an in-fill vacant property within a qualifying census tract. The proposed project requires a substantial amendment to the County's NSP action plan. The purpose of this substantial amendment is to allow Adams County to pursue the use of NSP funding for the redevelopment of demolished or vacant properties (also known as "Eligible Use E") to create affordable multifamily housing in the geographic areas specified in the NSP Action Plan. Further, it will allow the County to closeout NSP in mid-to-late 2020.

**STAFF RECOMMENDATION**

**2019 AAP**

Approval to proceed with the public comment period and approval for the proposed projects. The public comment period will begin June 19, and end at the July 23, 2019 public hearing for final approval. All project recommendations, outlined below, will meet CDBG and HOME program requirements, as well as the County's goals and objectives outlined in its 2015-2019 Con Plan.

**CDBG Projects**

Urban County Member	Project	Funding Amount
Adams County	Sherrelwood ADA Sidewalk and Ramps	\$400,000
Adams County	GRID Alternatives – Solar Installation	\$154,622
Adams County	7401 Broadway	\$308,000
City of Federal Heights	Minor Home Repair	\$23,386
City of Federal Heights	Rental Inspection Program	\$79,701
City of Northglenn	Pedestrian and Bicycle Trail Improvements	\$233,590
City of Brighton	ADA Sidewalks and Ramps	\$186,501
Town of Bennett	No Project	\$14,141
Adams County	Administration (20%)	\$272,985
<b>Total CDBG Projects</b>		<b>\$1,672,927</b>

**HOME 2019 Projects**

HOME Consortium Member	Project	Funding Amount
Urban County	Brighton Housing Authority (10 units)	\$400,000
Urban County	7401 Broadway (116 units)	\$316,871
City of Westminster	St. Mark Village (216 units)	\$541,321
City of Thornton	No project	\$172,883
Self-Asside	Project	Funding Amount
CHDO Reserve	Harris Park Apartments (24 units)	\$300,000
CHDO Operating	Administrative Costs	\$47,495
Administrative	Community Development Administration (10%)	\$94,991
<b>Total HOME Projects</b>		<b>\$1,873,561</b>

**NSP Action Plan Amendment**

Approval to proceed with the amendment public comment period and approval of the proposed project. The public comment period will begin June 19, 2019 and end at the July 23, 2019 public hearing for final approval. The project recommendation, outlined below, will meet NSP program requirements, as well as the County's goals and objectives outlined in its 2015-2019 Con Plan.

Developer	Project	Funding Amount
CRHDC	Harris Park Apartments (24 units)	\$1,413,820
<b>Total NSP Project</b>		<b>\$1,413,820</b>

**AGENCIES, DEPARTMENTS OR OTHER OFFICES INVOLVED:**

County Attorney

**ATTACHED DOCUMENTS:**

DRAFT 2019 Annual Action Plan  
 DRAFT NSP Action Plan Amendment  
 PPT Presentation

**FISCAL IMPACT:**

Please check if there is no fiscal impact . If there is fiscal impact, please fully complete the section below.

**Fund:**

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**Cost Center:**

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	<b>Object Account</b>	<b>Subledger</b>	<b>Amount</b>
Current Budgeted Revenue:			
Additional Revenue not included in Current Budget:			
<b>Total Revenues:</b>			<hr/>

	<b>Object Account</b>	<b>Subledger</b>	<b>Amount</b>
Current Budgeted Operating Expenditure:			
Add'l Operating Expenditure not included in Current Budget:			
Current Budgeted Capital Expenditure:			
Add'l Capital Expenditure not included in Current Budget:			
<b>Total Expenditures:</b>			<hr/>

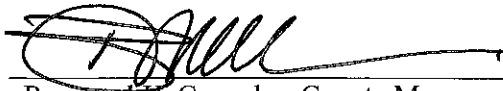
**New FTEs requested:**             YES         NO

**Future Amendment Needed:**             YES         NO

**Additional Note:**

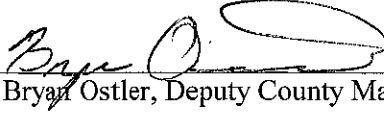
All funds are appropriated by HUD with no general funds.

**APPROVAL SIGNATURES:**



Raymond H. Gonzales, County Manager

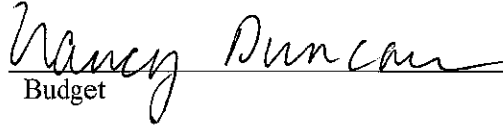
Alisha Reis, Deputy County Manager



Bryan Ostler, Deputy County Manager

Chris Kline, Deputy County Manager

**APPROVAL OF FISCAL IMPACT:**

  
Budget

*A presentation to the BoCC regarding*

# 2019 Annual Action Plan & NSP Action Plan Amendment

Community & Economic Development

June 18, 2019



ADAMS COUNTY  
COLORADO



# Why are we here?

- Discussion of US Department of Housing and Urban Development required plans:
  - 2019 Annual Action Plan and anticipated CDBG/HOME projects
  - NSP Action Plan amendment and anticipated NSP project

# 2019 Annual Action Plan

## Objectives

1. Adopts specific actions in accordance with the 2015-2019 Consolidated Plan;
2. Sets program milestones;
3. Identifies projects to address community and housing needs;
4. Allows for the opportunity to reallocate and reprogram funds from previous years; and
5. Allows an opportunity for the public to provide input on the use of funds.

# Anticipated CDBG Projects

\$1,364,927 - 2019 Allocation

\$308,000 - Program Income

Urban County Member*	Project	Funding Amount
Adams County	Sherrelwood ADA Sidewalk and Ramps	\$400,000
Adams County	GRID Alternatives - Solar Installation	\$154,622
Adams County	7401 Broadway	\$308,000*
City of Federal Heights	Minor Home Repair	\$23,386
City of Federal Heights	Rental Inspection Program	\$79,701
City of Northglenn	Pedestrian and Bicycle Trail Improvements	\$233,590
City of Brighton	ADA Sidewalks and Ramps	\$186,501
Town of Bennett	No Project	\$14,141
Adams County	Administration (20%)	\$272,985
<b>Total CDBG Projects</b>		<b>\$1,672,927</b>

\* Anticipated program income in June 2019

# Anticipated HOME Projects

\$949,905 - 2019 Allocation

\$923,656 - Program Income & Prior Year Resources

HOME Consortia Member*	Project	Funding Amount
Urban County	Brighton Housing Authority (10 units)	\$400,000
Urban County	7401 Broadway (116 units)	\$316,871
City of Westminster	St. Mark Village (216 units)	\$541,321
City of Thornton	No project	\$172,883
Set-Aside	Project	Funding Amount
CHDO Reserve*	Harris Park Apartments (24 units)	\$300,000
CHDO Operating	Administrative Costs	\$47,495
Administrative	Community Development Administration (10%)	\$94,991
<b>Total HOME Projects</b>		<b>\$1,873,561</b>

\* A required 15% allocation of HOME funds to an eligible Community Housing Development Organization (CHDO)

# NSP Action Plan Amendment

## Background

- Contract with CRHDC
- Remaining NSP Funding & program income - \$1,413,820
- HUD is encouraging NSP closeout as soon as possible

## Objectives

1. Allows for the opportunity to reallocate and reprogram grant funds and program income;
2. Amends an eligible use category; and
3. Allows an opportunity for the public to provide input on the use of funds.

# Anticipated NSP Project

\$1,085,078 - 2009 & 2011 Allocation

\$328,742 - Program Income

Developer	Project	Funding Amount
CRHDC	Harris Park Apartments (24 units)	\$1,413,820
<b>Total NSP Project</b>		<b>\$1,413,820</b>

# Next Steps

- Public Comment Period – June 19 - July 23
- BoCC Public Hearing – July 23
- Chair to sign HUD required attachments
- Submit Annual Action Plans
- Post-HUD acceptance
  - CDBG/HOME Agreements executed between HUD & County
  - Contracts with Subgrantees' executed by Chair

# Adams County Draft 2019 Annual Action Plan



Program Year  
July 1, 2019 - June 30, 2020





# Executive Summary

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

### 1. Introduction

An Annual Action Plan (AAP) is required by the U.S. Department of Housing and Urban Development (HUD) from all jurisdictions receiving Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds. The 2019 AAP is Adams County's (County) fifth program year Action Plan for the 2015-2019 Consolidated Plan (Con Plan). It outlines the County's needs, goals, and strategies for the 2019 program year (July 1, 2019 – June 30, 2020) and addresses citizen involvement, including information on available and potential resources. The priorities developed in this plan target a wide range of issues from basic needs, such as the availability of affordable housing for families and individuals, to overall community quality of life issues, such as improving facilities that provide services to low- and moderate- income (LMI) residents

The 2019 AAP was developed in accordance with HUD guidelines 24 Code of Federal Regulations (CFR) Part 91.220. This document represents a cooperative effort between the County, cities of Thornton, Westminster, Northglenn, Federal Heights, Brighton, and Town of Bennett, the public, and housing and service providers. Adams County Community Development administers of the CDBG and HOME programs and works with the Urban County and HOME Consortia members to accomplish the goals in the Consolidated Plan. The Urban County areas consists of the cities of Northglenn, Federal Heights, Brighton, Town of Bennett, and unincorporated Adams County. The HOME Consortia areas include the Urban County areas, as well as the cities of Thornton and Westminster.

### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Adams County has set the below Priorities and Objectives for the term of the Con Plan. These priorities and objectives were discussed with key community members, Urban County members, and used to solicit applications for CDBG and HOME funding for the 2019 program year. The proposed activities for the 2019 program year must align to the Con Plan's Priorities and Objectives outlined below:

## **Priorities & Objectives**

### **Priority: Housing**

*Objective #1* Rental housing is available for the low and very low-income populations where rental housing rates are low

*Objective #2* Affordable housing is located in areas easily adjacent to services including transit by the low to moderate-income populations

*Objective #3* Affordable housing is available for low-income renters that want to buy

*Objective #4* Aging housing stock of low to moderate-income owner-occupied units is rehabilitated and/or repaired

### **Priority: Community and Economic Development**

*Objective #1* More job services and job creation for Adams County residents

*Objective #2* Public facilities and community resources are created and enhanced to support low to moderate-income populations

*Objective #3* Invest strategically in neighborhoods to assist in revitalization

### **Priority: Seniors and other Prioritized Populations**

*Objective #1* Prioritized populations have housing options, especially those earning less than 40% AMI

*Objective #2* Services available for at-risk children

*Objective #3* Prioritized populations are educated about housing and service options

*Objective #4* Housing and services options near transit are enhanced for prioritized populations

*Objective #5* Integration of prioritized populations into the community

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

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The County maintains positive relationships with organizations and Urban County members responsible for undertaking many of the projects described in the AAP. Past project and program successes with these partners helped shape the County's goals for the 2019 program year. Due to historic commitment deficiencies, the County has been proactively setting the stage to commit and spend prior year resources by prioritizing "shovel ready" projects. The County has also continued to meet its timeliness ratio since 2015 program year. This outcome is a result of the County being committed to ensuring timeliness by choosing realistic and feasible projects that met those goals and objectives defined in the Con Plan. In addition, the County has taken several steps to improve the required monitoring process for Subgrantees and Subrecipients. This has improved the County's communication with all partners and ensures a positive relationship with any compliance issues. The County continues to have ongoing conversations with the HOME Consortia members regarding the County's expectations for long-term monitoring. The County is committed to ensuring compliance with all federal regulations through its monitoring obligations.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

The County included a variety of outreach efforts to have optimal public input that would inform the AAP. These efforts included service provider/key partner meetings, newspaper notifications, Urban County and HOME Consortia meetings, the County's webpage, and public hearings. Information regarding the proposed 2019 activities was available on the County's website for public comment for more than 30 days. Outreach efforts varied to reach diverse populations and ensure that the input received was insightful and representative of all County residents. It also encouraged the participation of those in specialized populations such as non-English speaking, persons with disabilities, residents of public housing, low-income residents and seniors. Adams County published the draft AAP, solicited input from providers and the public, and held a public hearing to approve the final plan for submittal to HUD.

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

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The 2019 AAP public comment period will begin on June 19, 2019 and end July 23, 2019 at the Board of County Commissioners' public hearing.

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

7. **Summary**

DRAFT

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

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

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	ADAMS COUNTY	Adams County Community Development
HOME Administrator	ADAMS COUNTY	Adams County Community Development
ESG Administrator		Adams County Community Development

**Table 1 – Responsible Agencies**

**Narrative**

The County’s strives to improve the quality of life for its residents through the management of grant-funded programs for housing, community development, and neighborhood revitalization. The common thread of the funds administered by the County is to benefit low- and moderate-income residents. Eighty percent (80%) of all funds and programs administered by the County directly impact the lives of low- and moderate-income residents. The County continues to opt out of Emergency Services Grant (ESG) funding and allocates those funds to the State of Colorado who administers the grant. With this arrangement, non-profits only have to apply to the State for ESG and are considered a first priority for the County's ESG allocation.

**Consolidated Plan Public Contact Information**

Melissa Scheere, Community Development Manager, Community and Economic Development Department  
 Adams County Government Center  
 4430 S. Adams County Pkwy, Suite W6204  
 Brighton, CO 80601  
 mscheere@adcogov.org

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

### **1. Introduction**

Adams County worked with a variety of agencies and municipalities that provide services to residents in order to collect data around housing, services and community development needs. Key partner focus groups and interviews were held to collect the data to inform the development of the Con Plan, the AAP, the 2017 Housing Needs Assessment (HNA), and the County's 2018 Balanced Housing Plan (BHP).

To gain a more thorough understanding of the housing situation in Adams County, three focus groups and a series of interviews with community leaders were conducted in late 2016 for the HNA. The County then held additional stakeholder engagement events to shape the BHP. The BHP's purpose is to take the information collected from the HNA and stakeholder input, and present defined goals and outcomes through a multifaceted and collaborative approach. As a result, the following goals were created to further speak to the many barriers in achieving "balanced housing" across a county with a diverse population and housing needs:

- Utilize New and Existing Tools
  - Reduce Constraints to Development
  - Expand Opportunities for Housing
- For more information, the final HNA and BHP can be found at <https://www.adcogov.org/BHP>. The BHP was ratified in July 2018.

### **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)).**

Adams County works in collaboration with the cities of Westminster and Thornton through the HOME Consortia to distribute HOME funds for eligible projects that create or preserve housing. Adams County also works with local certified Community Housing Development Organizations (CHDOs) and local housing authorities to provide essential services. These organizations include Community Resources and Housing Development Corporation (CRHDC), Unison Housing Partners (UHP), formally Adams County Housing Authority, and the Brighton Housing Authority (BHA).

### **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.**

Metro Denver Homeless Initiative (MDHI) works with homeless providers throughout the metro Denver region to coordinate homeless service efforts. In Adams County specifically, MDHI has a VISTA member placement with UHP to assist with coordinating the annual Point-in-Time homeless count. MDHI is

developing a regional coordinated assessment system, building a housing pipeline, and engaging other community partners to provide services to individuals homeless or at risk of becoming homeless throughout the metro Denver region. MDHI staff was consulted during the development of the 2015-2019 Con Plan. Adams County continues to coordinate with homeless providers working in the County to fund programs serving homeless individuals, families, families with children, veterans, youth, and persons at risk of becoming homeless.

In 2017, the Burnes Center presented the results of their study on homelessness in the County to the County to the Board of County Commissioners. The plan provided a number of short- and long-term recommendations. Since then the County has a team dedicated to addressing poverty and homelessness in Adams County.

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

Not applicable.

**2. Agencies, groups, organizations and others who participated in the process and consultations**

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

1	<b>Agency/Group/Organization</b>	City of Westminster
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency participated in the development of the 2019 AAP by discussing proposed HOME activities.
2	<b>Agency/Group/Organization</b>	City of Thornton
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency participated in the development of the 2019 AAP by discussing proposed HOME activities.
3	<b>Agency/Group/Organization</b>	ADAMS COUNTY HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Affordable Housing
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency participated in the development of the 2019 AAP by discussing proposed HOME activities.



4	<b>Agency/Group/Organization</b>	BRIGHTON HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency participated in the development of the 2019 AAP by discussing proposed HOME activities.
5	<b>Agency/Group/Organization</b>	Community Resources and Housing Development Corp
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency participated in the development of the 2019 AAP by discussing proposed CHDO activities.
9	<b>Agency/Group/Organization</b>	CITY OF FEDERAL HEIGHTS
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Minor Home Repair Program
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency participated in the development of the 2019 AAP by discussing proposed CDBG activities.
10	<b>Agency/Group/Organization</b>	City of Brighton
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Seniors and Other Prioritized Populations, Minor Home Repair Program

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency participated in the development of the 2019 AAP by discussing proposed CDBG activities.
11	<b>Agency/Group/Organization</b>	CITY OF NORTHGLENN
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Infrastructure Improvements
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency participated in the development of the 2019 AAP by discussing proposed CDBG activities.
12	<b>Agency/Group/Organization</b>	TOWN OF BENNETT
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Public Facility
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency participated in the development of the 2019 AAP by discussing proposed CDBG activities.
13	<b>Agency/Group/Organization</b>	ADAMS COUNTY
	<b>Agency/Group/Organization Type</b>	Other government - County Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Sustainability, Minor Home Repair Program and Infrastructure Improvements

<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Adams County Community and Economic Development Department and the Board of County Commissioners participated in the development of the 2019 AAP by discussing proposed CDBG and HOME activities.</p>
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**Identify any Agency Types not consulted and provide rationale for not consulting**

Not applicable.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Metro Denver Homeless Initiative (MDHI)	Adams County uses the MDHI Point in Time annual homeless count, and other research and coordination efforts to develop plans for serving homeless persons in Adams County.

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

**Narrative**

Not required - NA

## **AP-12 Participation - 91.401, 91.105, 91.200(c)**

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

The County included a variety of outreach efforts for citizen participation to provide valuable input included in the AAP. These efforts included service provider/key partner meetings, newspaper notifications, Urban County and HOME Consortia meetings, the County's webpage, and public hearings. The County has also made available information regarding the AAP and related citizen participation process on the County's website. Outreach efforts varied to reach diverse populations to include input that was insightful and representative of all Adams County residents. It also encouraged the participation of those in specialized populations such as non-English speakers, persons with disabilities, residents of public housing, low-income residents and seniors. Adams County encouraged participation by local institutions, members of the Continuum of Care, service providers, special needs providers, nonprofit organizations, and housing developers. This data was then analyzed by staff who incorporated the findings on housing, special needs, and community development into the priority outcomes. By determining the Priorities, the County was able to allocate funds to the appropriate agencies to provide those necessary services. Residents were encouraged to provide comments on the draft AAP through a publicized thirty (30) day public review period. The County publicized the availability of the draft AAP in multiple local newspapers and on the County's webpage on the County's website.

## 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	Internet Outreach	Non-targeted/ broad community	The County utilized its website to continually updates the public on upcoming public hearings, funding allocations, and reports, including the AAP.			<a href="http://www.adcogov.org/community-development">www.adcogov.org/community-development</a>
2	Public Hearing	Non-targeted/ broad community	The AAP Public Hearing on July 23, 2019.			<a href="http://adcogov.legistar.com/calendar.aspx">http://adcogov.legistar.com/calendar.aspx</a>
3	Newspaper Ad	Non-targeted/ broad community	The County published a Notice of Public Hearing and Request for Public Comments on June 19, 2019 in multiple local newspapers.			

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	Urban County Hearings	Urban County Members	Urban County members had public hearings for the proposed 2019 CDBG activities.			

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

Adams County's allocation of HUD funds (CDBG and HOME) is determined annually, and only after it receives a formal letter from HUD regarding the amount for each program. CDBG funds are allocated to jurisdictions that are Urban County members with projects in the County. Adams County is a HOME consortia, which includes the cities of Thornton and Westminster, as well as the Urban County areas. HOME funds are allocated to the two Consortia cities, and throughout the year to housing projects within the HOME Consortia and Urban County areas.

Federal dollars leverage additional funds in many of the projects completed as part of the Con Plan. Federal dollars are limited, and agencies completing projects will often utilize other funds to complete projects. The leveraged dollars represent a benefit to all Adams County residents. They stretch the grant funds received by the County, while allowing projects to precede that benefit either the area or a specific clientele. At the same time, it aids the agencies supplying the leveraged funds in meeting their goals. In addition to CDBG and HOME funds, Adams County provides local grants to human service organizations serving the County's low income individuals and families through its Community Enrichment Grant.

Each of these funding streams has allowed Adams County to target at-risk populations and leverage fixed program year allocations. These funding streams helped provide resources, services, and opportunities to people that may not qualify under HOME or CDBG guidelines and to neighborhoods that may not have been targeted with regular program year funding.

CDBG prior year resources total \$0 and no Program Income is projected.

HOME Prior Year Resources total \$878,762. Program Income that will be programmed in the 2019 program year is \$44,894 for activities related to HOME approved activities.

**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	1,364,977	308,000	0	1,672,977	0	Adams County will allocate 2019 CDBG funds to its Urban County members (four local jurisdictions) for their proposed projects.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	949,905	44,894	878,762	1,873,561	0	HOME funds are allocated in Thornton, Westminster (HOME Consortia), and throughout the county. Adams County uses 10% of HOME funds for administration of programs.



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: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	0	0	0	0	0	ESG funds are allocated to the State of Colorado.

Table 2 - 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**

County funded projects use a variety of other leveraged funds to cover the total cost of projects. HOME funded projects use Low Income Housing Tax Credit (LIHTC) equity, State of Colorado funds, private equity, and other resources to cover the cost of the development. CDBG typically leverage locally funded projects and/or help support gaps in funding that meet the goals of the Con Plan. Activities funded by HOME will have the required twenty-five (25%) match from previous program years and from fee reductions by local jurisdictions. In order to be considered HOME match, the funding must be a non-federal permanent contribution to affordable housing contributed in an eligible manner and properly documented. Adams County encourages all HOME funded projects to have program funding match.

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

Adams County and local jurisdictions may choose to provide publically held land for housing, community facility, and other eligible HOME and CDBG projects. No specific parcels are being used in the 2019 program year.

**Discussion**

Not required - NA

## 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	Infrastructure Improvements	2015	2019	Non-Housing Community Development	County-Wide City of Northglenn City of Brighton	Community and Economic Development Needs	CDBG: \$820,091	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 13480 Persons Assisted
2	Preservation of Existing Housing Stock	2015	2019	Affordable Housing	County-Wide City of Federal Heights City of Brighton	Housing Needs Community and Economic Development Needs Seniors and other Prioritized Populations	CDBG: \$657,708	Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: 22 Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 625 Household Housing Unit
3	Construction of New Rental Housing	2015	2019	Affordable Housing	County-Wide City of Westminster	Housing Needs Seniors and other Prioritized Populations	HOME: \$841,321	Rental units constructed: 356 Household Housing Unit

**Table 3 – Goals Summary**

#### Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Infrastructure Improvements
	<b>Goal Description</b>	<p>In 2018, the City of Northglenn proposed to install new infrastructure for a bicycle/pedestrian plan in its low to moderate income neighborhoods to improve overall mobility and accessibility for residents to other residential areas as well as connections to neighborhood services in commercial areas and public facilities. The City has requested its 2019 allocation (\$233,590) to be used for the same project, however, it will be used in different low-to-moderate income areas.</p> <p>City of Brighton is proposing to utilize its CDBG allocation (\$186,501) to improve Southern Street for pedestrian and multi-modal connectivity. The project will improve overall mobility and accessibility to the community. The surrounding areas meet the low-to-moderate income requirement.</p> <p>Adams County Public Works is proposing to use a portion of Adams County's CDBG allocation (\$400,000) to provide safe and adequate public improvements in a low-to-moderate income neighborhood, Sherrelwood. Improvements will focus on ADA compliant sidewalks and overall safe connectivity.</p>

2	<b>Goal Name</b>	Preservation of Existing Housing Stock
	<b>Goal Description</b>	<p>The Minor Home Repair (MHR) Program will serve low-to-moderate income homeowners throughout the City of Federal Heights. The program will address essential home repairs to promote decent, safe and sanitary conditions as well as accessibility issues. County staff will administer the MHR program for the City. The City has allocated \$23,386 in CDBG for the MHR program.</p> <p>City of Federal Heights will utilize its remaining CDBG allocation (\$79,701) to continue operating its Rental Inspection Program. The Rental Inspection Program promotes affordable, safe rental housing for its residents by administering a city-wide program to bring rental properties into code compliance.</p> <p>GRID Alternatives will utilize a portion of Adams County CDBG funds (\$154,621) to provide rooftop solar photovoltaic systems on owner occupied low-to-moderate income homes in unincorporated Adams County.</p> <p>Brighton Housing Authority (BHA) will utilize \$400,000 in HOME funds to rehabilitate BHA owned North 5th Avenue and South 18th Avenue duplexes. Rehabilitations will improve site accessibility and energy efficiency to ten (10) units benefiting persons of under 80% AMI. All units are three and four bedroom units.</p>
3	<b>Goal Name</b>	Construction of New Rental Housing
	<b>Goal Description</b>	<p>St. Mark Village is a 216, six (6) building, LIHTC project located at the NW corner of 97th Avenue and Federal Boulevard. The project will be financed with non-competitive private activity bonds issued by CHFA. One hundred percent (100%) of the units in the community will serve families earning at or below 60% AMI.</p> <p>Harris Park Apartments is a 24 unit of senior housing development. The development will offer community space and will be located at 73rd and Lowell Blvd. The project will serve households at or below 80% AMI.</p> <p>7401 Broadway is the County's first land contribution for affordable housing. The existing building is the former Adams County Child and Family Service Center donated to Unison Housing Partners. The office building will be an adaptive reuse into residential units and new walkup units will be constructed. The project will result in 116 units of affordable housing, all serving 70% or less AMI.</p>



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

### Introduction

Adams County has allocated CDBG and HOME funds to projects in 2019 that meet the County's 2015-2019 Con Plan's Priority Needs and Annual Goals.

CDBG projects include minor home rehabilitation and public infrastructure. Adams County and the cities of Brighton, Northglenn and Federal Heights have prioritized projects in their jurisdictions and will oversee projects within their communities.

HOME projects include the creation of two new affordable housing rental projects.

#	Project Name
1	CDBG: Housing
2	CDBG: Infrastructure
4	CDBG: Administration
5	HOME: Adams County
6	HOME: CHDO
7	HOME Administration
8	HOME: Westminster

Table 4 – Project Information

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

Community input from the Urban County members, community organizations, and non-profits determined how the County will allocate priorities described in the Con Plan. Urban County members participate in the Urban County through a formula basis and after receiving their allocation, the County works with each to identify a project that addresses the Con Plan goals and meets the needs of their respective residents. While the current housing market creates barriers to addressing many of the issues contributing to the increase in need for affordable housing, the County continues to improve its working relationships with developers, housing authorities and others to overcome this obstacle. In addition, the County dedicated part of its 2016 CDBG administration costs to the development of the County's 2017 Housing Needs Assessment and 2018 Balanced Housing Plan to address the issues that were raised in the 2015 Analysis of Impediments to Fair Housing Choice.

## AP-38 Project Summary

### Project Summary Information

<b>1</b>	<b>Project Name</b>	CDBG: Housing
	<b>Target Area</b>	County-Wide City of Federal Heights
	<b>Goals Supported</b>	Construction of New Rental Housing Preservation of Existing Housing Stock
	<b>Needs Addressed</b>	Housing Needs Seniors and other Prioritized Populations Community and Economic Development Needs
	<b>Funding</b>	CDBG: \$565,708
	<b>Description</b>	The Minor Home Repair (MHR) Program will serve low-to-moderate income homeowners throughout the City of Federal Heights. The program will address essential home repairs to promote decent, safe and sanitary conditions as well as accessibility issues. County staff will administer the MHR program for the City. The City has allocated \$23,386 in CDBG for the MHR program. City of Federal Heights will utilize its remaining CDBG allocation (\$79,701) to continue operating its Rental Housing Inspection Program. The Rental Housing Inspection Program promotes affordable, safe rental housing for its residents by administering a city-wide program to bring rental properties into code compliance. GRID Alternatives will utilize a portion of Adams County CDBG funds (\$154,621) to provide rooftop solar photovoltaic systems on owner occupied low-to-moderate income homes in unincorporated Adams County. 7401 Broadway is the County's first land contribution for affordable housing. The existing building is the former Adams County Child and Family Service Center donated to Unison Housing Partners. The office building will be an adaptive reuse into residential units and new walkup units will be constructed. The project will result in 116 units of affordable housing, all serving 70% or less AMI. CDBG (\$308,000) will be utilized to pay for eligible soft costs.
	<b>Target Date</b>	6/30/2020



<p><b>Estimate the number and type of families that will benefit from the proposed activities</b></p>	<p>The Minor Home Repair (MHR) Program will serve approximately two (2) low-to-moderate income homeowners throughout the City of Federal Heights.</p> <p>The Rental Housing Inspection Program will inspect approximately 625 units in the City of Federal Heights.</p> <p>GRID Alternatives solar installation program will serve approximately 20 low-to-moderate income homeowners throughout unincorporated Adams County.</p> <p>7401 Broadway will result in 116 units of affordable housing, all serving 70% or less AMI.</p>
<p><b>Location Description</b></p>	<p>See above.</p>
<p><b>Planned Activities</b></p>	<p>The Minor Home Repair (MHR) Program will serve low-to-moderate income homeowners throughout the City of Federal Heights. The program will address essential home repairs to promote decent, safe and sanitary conditions as well as accessibility issues. County staff will administer the MHR program for the City. The City has allocated \$23,386 in CDBG for the MHR program.</p> <p>City of Federal Heights will utilize its remaining CDBG allocation (\$79,701) to continue operating its Rental Housing Inspection Program. The Rental Housing Inspection Program promotes affordable, safe rental housing for its residents by administering a city-wide program to bring rental properties into code compliance.</p> <p>GRID Alternatives will utilize a portion of Adams County CDBG funds (\$154,621) to provide rooftop solar photovoltaic systems on owner occupied low-to-moderate income homes in unincorporated Adams County.</p> <p>7401 Broadway is the County's first land contribution for affordable housing. The existing building is the former Adams County Child and Family Service Center donated to Unison Housing Partners. The office building will be an adaptive reuse into residential units and new walkup units will be constructed. The project will result in 116 units of affordable housing, all serving 70% or less AMI. CDBG (\$308,000) will be utilized to pay for eligible soft costs.</p>
<p><b>2</b></p>	<p><b>Project Name</b></p> <p>CDBG: Infrastructure</p>
<p><b>Target Area</b></p>	<p>County-Wide City of Northglenn City of Brighton</p>

<b>Goals Supported</b>	Infrastructure Improvements
<b>Needs Addressed</b>	Seniors and other Prioritized Populations Community and Economic Development Needs
<b>Funding</b>	CDBG: \$820,091
<b>Description</b>	In 2018, the City of Northglenn proposed to install new infrastructure for a bicycle/pedestrian plan in its low to moderate income neighborhoods to improve overall mobility and accessibility for residents to other residential areas as well as connections to neighborhood services in commercial areas and public facilities. The City has requested its 2019 allocation (\$233,590) to be used for the same project, however, it will be used in different low-to-moderate income areas. City of Brighton is proposing to utilize its CDBG allocation (\$186,501) to improve Southern Street for pedestrian and multi-modal connectivity. The project will improve overall mobility and accessibility to the community. The surrounding areas meet the low-to-moderate income requirement. Adams County Public Works is proposing to use a portion of Adams County's CDBG allocation (\$400,000) to provide safe and adequate public improvements in a low-to-moderate income neighborhood, Sherrelwood. Improvements will focus on ADA compliant sidewalks and overall safe connectivity.
<b>Target Date</b>	6/30/2020
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The proposed activities will benefit approximately 13,480 low-to-moderate income families.
<b>Location Description</b>	The proposed activities will be undertaken in the City of Federal Heights, the City of Brighton, and the Sherrelwood neighborhood of unincorporated Adams County.

	<b>Planned Activities</b>	<p>In 2018, the City of Northglenn proposed to install new infrastructure for a bicycle/pedestrian plan in its low to moderate income neighborhoods to improve overall mobility and accessibility for residents to other residential areas as well as connections to neighborhood services in commercial areas and public facilities. The City has requested its 2019 allocation (\$233,590) to be used for the same project, however, it will be used in different low-to-moderate income areas.</p> <p>City of Brighton is proposing to utilize its CDBG allocation (\$186,501) to improve Southern Street for pedestrian and multi-modal connectivity. The project will improve overall mobility and accessibility to the community. The surrounding areas meet the low-to-moderate income requirement.</p> <p>Adams County Public Works is proposing to use a portion of Adams County's CDBG allocation (\$400,000) to provide safe and adequate public improvements in a low-to-moderate income neighborhood, Sherrelwood. Improvements will focus on ADA compliant sidewalks and overall safe connectivity.</p>
<b>3</b>	<b>Project Name</b>	CDBG: Administration
	<b>Target Area</b>	County-Wide
	<b>Goals Supported</b>	Preservation of Existing Housing Stock Infrastructure Improvements
	<b>Needs Addressed</b>	Housing Needs Seniors and other Prioritized Populations Community and Economic Development Needs
	<b>Funding</b>	CDBG: \$272,995
	<b>Description</b>	Adams County will retain the allowable twenty percent (20%) of 2019 CDBG funding for Adams County Community Development staff to administer the program.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	

<b>4</b>	<b>Project Name</b>	HOME: Adams County
	<b>Target Area</b>	County-Wide City of Brighton
	<b>Goals Supported</b>	Construction of New Rental Housing Preservation of Existing Housing Stock
	<b>Needs Addressed</b>	Housing Needs
	<b>Funding</b>	HOME: \$716,871
	<b>Description</b>	Brighton Housing Authority (BHA) will utilize \$400,000 in HOME funds to rehabilitate BHA owned North 5th Avenue and South 18th Avenue duplexes. Rehabilitations will improve site accessibility and energy efficiency to ten (10) units benefiting persons of under 80% AMI. All units are three and four bedroom units. 7401 Broadway is the County's first land contribution for affordable housing. The existing building is the former Adams County Child and Family Service Center donated to Unison Housing Partners. The office building will be an adaptive reuse into residential units and new walkup units will be constructed. The project will result in 116 units of affordable housing, all serving 70% or less AMI. HOME funds will assist in the development of project, \$316,871.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Brighton Housing Authority will improve site accessibility and energy efficiency to ten (10) units benefiting persons of under 80% AMI.  7401 Broadway will result in 116 units of affordable housing, all serving 70% or less AMI.
	<b>Location Description</b>	Brighton Housing Authority will improve two sites in the City of Brighton: North 5th Avenue and South 18th Avenue.  Unison Housing Partners will be rehabilitating and creating new rental housing at 7401 Broadway, Denver, CO.

	<b>Planned Activities</b>	<p>Brighton Housing Authority (BHA) will utilize \$400,000 in HOME funds to rehabilitate BHA owned North 5th Avenue and South 18th Avenue duplexes. Rehabilitations will improve site accessibility and energy efficiency to ten (10) units benefiting persons of under 80% AMI. All units are three and four bedroom units.</p> <p>7401 Broadway is the County's first land contribution for affordable housing. The existing building is the former Adams County Child and Family Service Center donated to Unison Housing Partners. The office building will be an adaptive reuse into residential units and new walkup units will be constructed. The project will result in 116 units of affordable housing, all serving 70% or less AMI.</p>
5	<b>Project Name</b>	HOME: CHDO
	<b>Target Area</b>	City of Westminster
	<b>Goals Supported</b>	Construction of New Rental Housing
	<b>Needs Addressed</b>	Housing Needs Seniors and other Prioritized Populations
	<b>Funding</b>	CDBG: \$347,495
	<b>Description</b>	Harris Park Apartments is a twenty four (24) units of senior housing. The development will offer community space and will be located at 73rd and Lowell Blvd. The project will serve households at or below 80% AMI. Additionally, CRHDC will be receiving CHDO Operating funds.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Harris Park Apartments is a twenty four (24) units of senior housing for households at or below 80% AMI.
	<b>Location Description</b>	Harris Park will be located at 73rd and Lowell Blvd. in Westminster, CO.
	<b>Planned Activities</b>	<p>Harris Park Apartments is a twenty four (24) units of senior housing. The development will offer community space and will be located at 73rd and Lowell Blvd. The project will serve households at or below 80% AMI.</p> <p>Additionally, Community Resources &amp; Housing Development Corporation will be receiving CHDO Operating funds.</p>
	<b>Project Name</b>	HOME Administration

6	<b>Target Area</b>	County-Wide
	<b>Goals Supported</b>	Construction of New Rental Housing Preservation of Existing Housing Stock
	<b>Needs Addressed</b>	Housing Needs Seniors and other Prioritized Populations Community and Economic Development Needs
	<b>Funding</b>	HOME: \$94,990
	<b>Description</b>	Adams County will retain ten percent (10%) of 2019 HOME funding for Adams County Community Development staff for HOME program administration. Further, ten percent (10%) of applicable Program Income (PI) from prior year(s) activities will also be used for administration.
	<b>Target Date</b>	6/30/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	
7	<b>Project Name</b>	HOME: Westminster
	<b>Target Area</b>	City of Westminster
	<b>Goals Supported</b>	Construction of New Rental Housing
	<b>Needs Addressed</b>	Housing Needs
	<b>Funding</b>	CDBG: \$541,321
	<b>Description</b>	St. Mark Village is a 216 unit, six (6) building LIHTC project located at the NW corner of 97th Avenue and Federal Boulevard. The project will be financed with non-competitive private activity bonds issued by CHFA. One hundred percent of the units in the community will serve families earning at or below sixty percent (60%) AMI.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	St. Mark Village will consist of 216 units of housing for families at or below 60% AMI.

	<b>Location Description</b>	St. Mark Village will be located at the NW corner of 97th Avenue and Federal Boulevard.
	<b>Planned Activities</b>	St. Mark Village is a 216 unit, six (6) building LIHTC project located at the NW corner of 97th Avenue and Federal Boulevard. The project will be financed with non-competitive private activity bonds issued by CHFA. One hundred percent of the units in the community will serve families earning at or below sixty percent (60%) AMI.

## **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**

Adams County encompasses approximately 1,183.6 square miles. It extends 72 miles west to east, and 18 miles north to south. It is adjacent to Denver and is one of the five counties that make up the Denver metropolitan area. All of Colorado's interstate highways (I-25, I-70, and I-76) and their associated loops (I-225, I-270) converge in Adams County. In addition, US Highways 36, 287, 6 and 85 also run through the County. E-470 completes the connection from C-470 in the south, through Denver International Airport and finally to I-25.

Adams County, which historically has been agricultural in nature, has undergone a development typical to counties in close proximity to a major metropolitan city. Urbanization has occurred most rapidly in the western part of the County as a result of the continued growth in the Denver Metro region. The eastern section of the County, with the exception of the Towns of Bennett and Strasburg, are comprised mainly of farms and rangeland. The Town of Bennett has experienced historic growth throughout the last year and has developed a strategic plan for growth largely due to its proximity to Front Range Airport and downtown Denver.

Cities within the geographic county include Arvada, Aurora, Brighton, Commerce City, Federal Heights, Northglenn, Strasburg, Thornton and Westminster and the Town of Bennett. Adams County has a diverse mix of large, suburban communities, smaller towns, and rural farming communities that have an extensive range and mix of housing, commercial enterprises and public services.

Adams County does not plan to target funds to "geographic priority" areas, however, allocations have been made to specific communities throughout Adams County for projects that are local priorities. The following communities receive allocations of CDBG funds based upon their total populations and low income populations, and apply to Adams County to use the funds within their own communities based on local priorities and needs: Town of Bennett, Unincorporated Adams County, and the Cities of Brighton, Federal Heights, and Northglenn.

The communities of Thornton and Westminster receive direct CDBG allocations from HUD, and are part of the Adams County HOME consortia. Consortia members are allocated a set-aside of HOME funds for projects within their communities. The remaining HOME funds are allocated by Adams County.



## Geographic Distribution

Target Area	Percentage of Funds
County-Wide	55
City of Thornton	6
City of Federal Heights	4
City of Northglenn	8
City of Commerce City	0
Town of Bennett	1
City of Brighton	7
City of Westminster	19

**Table 5 - Geographic Distribution**

### Rationale for the priorities for allocating investments geographically

In 2019, the Urban County IGA will be recertified for another three (3) year requalification period. CDBG funding allocations can be made up to the amounts in the agreement, if the local governments have eligible projects each year. Applications for funding are made to Adams County, and reviewed for eligibility within the CDBG and HOME program guidelines. Public improvements are made in jurisdictions mentioned throughout the AAP, and must serve low-to-moderate income census tracts.

### Discussion

Not required - NA

## Affordable Housing

### AP-55 Affordable Housing - 91.420, 91.220(g)

#### Introduction

Adams County will fund many affordable housing projects, including homeowner rehabilitation and new construction of affordable rental.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	388
Special-Needs	0
Total	388

**Table 6 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	356
Rehab of Existing Units	32
Acquisition of Existing Units	0
Total	388

**Table 7 - One Year Goals for Affordable Housing by Support Type**

## **AP-60 Public Housing - 91.420, 91.220(h)**

### **Introduction**

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

The housing authorities have not determined any needs to address at this time.

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

Unison Housing Partners (UHP) values the input of its residents. UHP's Resident Advisory Board, made up of residents who reside at UHP properties, meets quarterly to discuss UHP's priorities and property improvements. The UHP Board is responsible for establishing the policies of the Authority and for oversight of the fiscal and practical implementation of those policies. Members of the Board are appointed by the Adams County Commissioners and serve staggered terms. UHP's Board includes a seat for an Adams County resident of low-income housing; currently this seat is held by a resident of an UHP property. Annually, UHP surveys all residents of its properties to get feedback across a wide array of topics pertaining to resident housing. Additionally, during the planning stage of any future developments, UHP will solicit input from residents of its existing properties and area residents for design and programming.

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

Not applicable, PHA is not designated as troubled.

### **Discussion**

Not required - NA

## **AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)**

### **Introduction**

The County works with local homeless providers and municipalities to reduce homelessness throughout Adams County and the region. Additionally, the Burnes Center on Poverty and Homelessness in Denver, Colorado conducted a homelessness study in 2016 and provided recommendations for the County to consider in proactively addressing homelessness. In response to the study, Adams County hired a Homelessness Outreach Liaison to convene and coordinate homelessness efforts with community partners and municipalities. The Liaison is actively a) coordinating the Adams County Coalition for the Homeless, b) researching initiatives such as tiny home villages and a workforce program for people currently homeless, and c) working with partners to address homeless encampments, support current services, expand outreach efforts, create a resource navigation network and a coordinated entry system.

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

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

The Board has identified homelessness and reducing poverty as priority needs for the County. The County has laid out homeless assistance, homeless prevention goals and is working on implementing its Community Enrichment Plan developed by Human Services. The County administers a variety of housing and non-housing community development resources which are used to support the efforts of a broad based community network of service providers which provide homeless assistance in the County and the municipalities. Service providers supported by the County provide outreach and case management which assess individual needs and links them with the continuum of services available in the County.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

There is a shortage of emergency and transitional housing in the County. Three of the four current shelters serve families with minor aged children, one shelter serves individuals but is a cold weather shelter and is closed in the summer months (April to October). There is little public support for creation of mass shelters. The County and most shelter providers have resorted to a housing first model and a rapid re-housing approach to find shelter for those with no shelter options. Because of the lack of affordable rental units, service providers often have to refer households needing emergency shelter or transitional housing to housing providers in surrounding jurisdictions. The County is aligning partnerships and resources to address the shortage of affordable units by working with non-profit and private developers, encouraging new developments that would add to the affordable housing inventory. The Homelessness Outreach Liaison is working with existing homeless providers to increase the number of beds and transitional housing opportunities available through existing homeless providers. The Liaison is also meeting and coordinating with municipal governments to identify

development opportunities in their jurisdictions and will be supportive of new affordable developments that municipalities bring forth.

**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**

While some shelters adopted a housing focused approach, it is often difficult to move people experiencing homelessness into permanent housing because of the shortage of transitional units in the County. If shelter and service providers are unable to place a household in permanently affordable housing in Adams County, they work with housing providers in surrounding jurisdictions to find suitable housing. In addition to looking for housing in surrounding jurisdictions, some shelters and service providers have the ability and funds to provide the necessary financial assistance to keep them in their current housing. If the household obtains stable housing, the service providers funded by the County will provide the necessary supportive services to assist that family in maintaining stability and moving toward independence. The supportive services continue so that the formerly homeless households have less chance of experiencing another episode of homelessness.

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

The County funds and supports the local network of service providers which provide homelessness prevention services to households in danger of homelessness. By using a prevention strategy, service providers are better able to help households maintain stability in their housing. In order to maintain stability, financial assistance for rent, mortgage, utility and other household necessities is provided by partner agencies. The programs also provide case management and referral services to assist that family in overcoming the challenges that brought them to the brink of homelessness. The County is partnering with and supporting Colorado Legal Services to target individuals and families on the brink of losing their current housing due to an eviction. Services are provided by appointment at a Westminster Public Library (Irving St.) as well as a walk-in basis at the County Courthouse. Service providers are also working to coordinate and implement a diversion or rapid resolution program for people who may resolve their housing crisis before entering the homelessness service system. The County is also proactively looking at zoning and code to preserve and prevent displacement of current mobile home

communities.

**Discussion**

Not required - NA

## **AP-75 Barriers to affordable housing -91.420, 91.220(j)**

### **Introduction**

Over the last decade Adams County has experienced a wide range of economic and demographic transitions. These transitions have led to a county that can pride itself on becoming a desirable destination for those looking to live in a community that is inclusive and that provides lifestyle opportunities that fail to exist in other areas in the seven (7) county Denver Metro region (Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas and Jefferson). The County's current housing climate and geographic location have contributed to the County's growing population – fifth largest and second fastest in the region. In addition, a diversity of land uses from dense cities to suburbs and open range-land, gives the County a unique identity aiding in its growth. The resulting pressures of this growth and housing stock demands have pushed housing prices to a point where many residents struggle to either find attainable housing or maintain their housing.

In a proactive effort to create solutions to the County's housing challenges, the County commissioned the 2017 Housing Needs Assessment (HNA). The HNA created a thorough economic and demographic description of the County, including its strengths and challenges as they relate to housing. The HNA identified findings that were then presented to various stakeholders who provided valuable input and possible solutions. This input also helped build the framework for developing the County's 2018 Balanced Housing Plan (BHP). The BHP's purpose is to take the information collected from the HNA and stakeholder input, and present defined goals and outcomes through a multifaceted and collaborative approach. This plan is truly a balanced housing plan as it seeks to build a platform that allows all areas of the County to achieve housing of all types, and meets the needs of the County's diverse and growing population.

BHP provides recommendations on how to address the following findings:

- Finding 1: Housing is less affordable
- Finding 2: Increasing affordability gap at all income levels
- Finding 3: Housing supply is not meeting demand
- Finding 4: Adams County has distinct socioeconomics

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

Adams County has identified affordable housing as a high priority and has moved to address this through several planning efforts including the Adams County 2015-2019 Con Plan. Through the development of the HNA and BHP, the county focused on creating a plan that provides a roadmap to

addressing some of the County's housing barriers by focusing on a balance of the housing.

Balanced Housing is achieved by a community's ability to provide a variety of housing choices that reflect an individual's financial and lifestyle needs. By recognizing that housing needs are shaped by access to jobs, education, and amenities, the BHP is designed as a guide for the County as it strives to provide its residents with housing opportunities that meet their needs and achieving a greater quality of life. The BHP was the next step in county-wide recommendations and set forth the following goals and policies:

#### Goals

1. Utilize New and Existing Tools
2. Reduce constraints to development
3. Expand Opportunities

#### Policies

1. Improve and support housing opportunities for all residents in Adams County
2. Foster an environment the promotes "balanced housing"
3. Encourage connection and access between schools and housing
4. Promote the preservation of the County's current housing stock
5. Integrate development practices the increase diversity in housing options

#### **Discussion**

Not required - NA



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

### **Introduction**

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

Adams County is a large county making it difficult to adequately deliver services to both urban and rural constituencies. The mixture of urban and rural land throughout the county poses both service delivery and service recipient challenges. Many of the core agencies are located in the more urban portions of the County which makes service delivery in the eastern and northern rural portions of the county difficult. The lack of adequate transportation and service providers in the rural areas are a hindrance to meeting the needs of the underserved throughout the County.

One of the major problems associated with meeting the needs of the underserved is the levels of funding. In today's economy, more and more county residents are requesting services, which places strains on the County's capacity to adequately provide appropriate care.

One of the areas of weakness that Adams County continues to face is a fully functional referral system. This can be attributed to the recent funding uncertainties within all federally-funded areas (TANF, Food Stamps, Medicaid, etc.) and the vast geographic parameters of service-delivery agencies. The County is working to increase the availability of information for both service-providers and residents. The County and local service-delivery agencies strive to increase the availability of information online, to minimize the number of unassisted referrals. With additional collaboration with the County's public information office, Communications, the County hopes to increase its outreach at community meetings hosted by other departments, public input gained through public hearings, working with senior centers, non-profits who work directly with citizens, and County Poverty Symposiums with regional non-profits addressing the reduction of poverty.

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

Adams County has made new construction of affordable rental housing and preservation of existing affordable housing priorities for receiving HOME and CDBG funds. Adams County works with the local housing authorities, nonprofit housing agencies and private developers to expand and preserve the affordable housing stock throughout the county.

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

The local Housing Authorities, the Minor Home Repair Program, and other Section 8 provider agencies strictly adhere to the Uniform Property Condition Standards (UPCS) for public housing and Section 8 tenants, and the Lead Safe Housing Rule. Housing Authorities will not allow Section 8 tenants to rent units with lead hazards that are not mitigated by the landlord. In addition, all units owned and purchased and rehabilitated by the housing authorities are mitigated for lead.

Grantees receiving HOME or CDBG funds to purchase and renovate properties which contain lead-based paint are responsible for paying for and coordinating detection and mitigation of lead hazards within the property.

The Adams County Minor Home Repair program requires lead hazard testing when conducting rehabilitation that could involve lead-based paint, and achieve clearance from certified inspectors when the rehabilitation is required per 24 CFR Part 58. All work is completed in accordance with the Lead Safe Housing Rule.

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

The Adams County Workforce and Business Center, the County's Community Enrichment Committee, local municipalities, and community agencies work together to identify the emergent employment needs of the low income population and develop appropriate responses to these needs. The Workforce and Business Center provides routine classes and training to enhance the skills of the emerging labor force. The County can also identify qualified and interested business owners, potential business owners and small business owners, as well as those interested in learning a new trade, all of which will foster a comprehensive Section 3 list for future projects. Housing authorities and housing providers are engaged to identify those residents in need of training and/or interested in participating with the Section 3 initiative.

The UHP provides self-sufficiency services to residents of their housing units and clients of the Section 8 voucher program. The FSS program has a proven track record of helping residents gain the skills necessary to move themselves out of poverty.

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

The County is the lead agency in both the CDBG Urban County and the HOME Consortia. Adams County's

Urban County consists of:

- Town of Bennett
  - City of Brighton
  - City of Federal Heights
  - City of Northglenn
- Every three years, these jurisdictions are re-invited to renew their Intergovernmental Agreement (IGA) with the County. Each of them receives a percentage of the County's CDBG allocation based on a formula allocation (total and low-income populations). As the lead agency, the County monitors each jurisdiction's projects to ensure they meet national objectives, eligibility, and compliance issues such as environmental review clearances. All projects are assessed through an application process for eligibility and feasibility. In addition to the Urban County, Adams County leads a HOME Consortia with the cities of Westminster and Thornton. A percentage of the county's annual HOME allocation is reserved to each of these municipalities based on a formula determined and posted annually by HUD. The County recertified the HOME Consortia and Urban County IGAs for an additional three (3) year period in 2019. The County also provides portions of its HOME allocation to: Community Development Housing Organizations (CHDO's) (15% requirement) Local Housing Authorities Non-profit housing developers For-profit developers Adams County has increased CHDO qualification strategies to align with the 2013 HOME Final Rule amendments and HUD best practices. Adams County will continue to seek and certifying new CHDOs throughout the County for the purposes of expanding the County's capacity to undertake projects. The County also provides operating expenses to certified CHDOs to help increase capacity and administer HOME projects.

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

Adams County will continue efforts to provide technical assistance to community partners as part of its coordination between public and private housing and social service agencies, as well as encouraging sub-recipients to work together to leverage resources and knowledge. The County fosters collaboration between departments to determine the highest and best use of all funding received by the division. These departments include, but not limited to, Public Works, Human Services, Workforce Business Center, and the County Manager's Office and other partners to strengthen the delivery of services to all areas of the County.

### **Discussion**

Not required - NA

# Program Specific Requirements

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

### Introduction

#### 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%

#### HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

Adams County is not utilizing other forms of investment outside as outlined in CFR 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

In regard to activities carried out during the 2019 program year (identified in the 2017 AAP), recapture provisions are relevant to the Community Resources and Housing Development Corporation's (CRHDC) proposed HOME activities for low-to-moderate income homebuyers.

CRHDC will acquire and rehabilitate affordable homes and sell to eligible homebuyers. Through this program, the homebuyer will also receive HOME assistance by the reduction of the purchase price of the home through the utilization of HOME funds for acquisition and rehabilitation. Proceeds from the sale of the property to an eligible homebuyer will be returned to the County as program income and revolved back into another home for acquisition and rehabilitation – similar to NSP. The HOME assistance provided to the homebuyer will follow Recapture Provisions as set forth in a Deed of Trust and Promissory Note to reduce/forgive the direct subsidy of the HOME investment on a pro-rata basis for the amount of time the homeowner owned and occupied the housing measured against the affordability period. The period of affordability will be set by the applicable period in the HOME rule based on the direct subsidy amount. Resale provisions will not apply to this activity.

The County will not be participating in the First Time Homebuyer Program (FTHB) program in the 2019 program year; however, it is expected that there will be recapture from FTHB participants who did not meet the affordability period. UHP operated the FTHB program, and adhered to the affordability requirements as set forth in 24 CFR Part 92.254(a)(4) based on the per unit direct HOME subsidy on a pro-rata basis per the recapture provision.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The period of affordability is set by the applicable period in the HOME rule based on the direct subsidy amount to the homebuyer, which will be as outlined in the Deed of Trust and Promissory Note. The direct subsidy amount is determined by the difference in reduced purchase price and market value. The recorded Deed of Trust secures the HOME direct subsidy for the term of the affordability period and references the Promissory Note which outlines the recapture provisions.

Recapture provisions reduce/forgive the HOME investment on a pro-rata basis for the amount of time the homebuyer owned and occupied the housing measured against the affordability period. For example, if \$10,000 in direct subsidy was provided with a five (5) year affordability period and the homeowner sells the home after two (2) years, the affordability period would not be met. The homeowner would then be required to pay 60% of the direct subsidy or \$6,000 in recapture, while \$4,000 is forgiven. If the homeowner refinances and stays in the home, the affordability period is still being met and no payments are due to the County. If the homeowner refinances to take cash out or takes out a home equity loan, the affordability period is not met and the homeowner is

obligated to pay the remaining balance of the loan as outlined above. The County will never recapture more than the unforgiven amount of the direct subsidy.

As part of the County's annual monitoring process, CRHDC will be required to submit annual monitoring documents to ensure continued occupancy.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

24 CFR 92.206 does not apply as the County does not utilize HOME funds to refinance existing debt of multi-family housing.

### **Emergency Solutions Grant (ESG)**

1. Include written standards for providing ESG assistance (may include as attachment)

NA

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

NA

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

NA

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

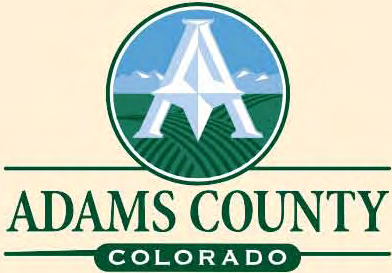
NA

5. Describe performance standards for evaluating ESG.

NA

NA

# Adams County Draft NSP Action Plan Amendment





# **Adams County**

## **NSP1 Substantial Amendment**

**Jurisdiction(s): Adams County, Colorado**  
**Lead Agency: Adams County**  
**NSP Contact Person: Community Development Manager**  
**Address: 4430 S. Adams County Pkwy., Brighton, CO 80601**  
**Telephone: (720) 523-6200**

### ***A. AREAS OF GREATEST NEED***

Adams County, Colorado is located in the Denver metropolitan area. The county's current population of nearly 500,000 residents is spread out over 1,182 square miles with the majority of the population concentrated on the western third of the county. The county contains a diverse mix of land uses varying from older first-ring cities and new green-field suburbs to expanses of open rangeland. All or portions of nine municipalities are found in Adams County. The City and County of Denver is contiguous to our southern border.

Roughly 100,000 residents live in unincorporated Adams County with the majority of the population living in the cities of Northglenn, Thornton, Westminster, Brighton, Commerce City, Aurora, Arvada and Federal Heights. The towns of Bennett, Strasburg and Watkins are located in the eastern plains and are predominately agricultural, but rapidly urbanizing communities. All communities with the exception of Commerce City, Thornton, Westminster, Arvada and Aurora (which are their own entitlement communities) participate in the Urban County partnership jurisdiction.

The poverty in Adams County is around 13%. Populations with low-incomes and living in poverty are concentrated in a number of locations throughout the county. These locations are largely found in the southwestern portion of the county including Aurora, Commerce City, the older communities of unincorporated Adams County, and portions of the older neighborhoods of Thornton, Federal Heights, Northglenn and Brighton.

Due to the dramatic levels of foreclosures in Adams County during the Great Recession (2007-2012), Adams County Community Development (ACCD) and other partner agencies such as the Adams County Housing Authority (now known as Unison Housing Partners), city representatives from Northglenn, Thornton, Brighton, Commerce City, various non-profits and the County Public Trustee formed a foreclosure task force towards the end of 2007. The task force began mapping foreclosures, identifying effective strategies and coordinating the marketing of foreclosure prevention workshops implemented by the housing authority.

In recent years, the housing market has improved, resulting in a dramatic decline in the number of foreclosures in Adams County. The current real estate market conditions and NSP eligibility requirements have made it difficult to acquire and rehabilitate single-family homes as the county has done in the past with its NSP funds. Therefore, the county is pursuing new means of developing affordable housing through the acquisition and redevelopment of demolished or vacant properties, as per NSP's Eligible Use E. The need for affordable housing has been identified in the 2017 Adams County Housing Needs Assessment, citing the increasing disparity between incomes housing costs, known as the "affordability gap"

[http://www.adcogov.org/sites/default/files/Adams\\_County\\_Housing\\_Needs\\_Assessment\\_11-8%20edit.pdf](http://www.adcogov.org/sites/default/files/Adams_County_Housing_Needs_Assessment_11-8%20edit.pdf)).

While the **original** 2008 NSP1 Action Plan included the following information (using HUD data) to identify the initial priority areas, the market has changed substantially in the County a decade later; however, these were the original identified areas of greatest needs:

#### **City of Commerce City**

*For purposes of determining the areas of greatest need within the city's boundaries, Commerce City used data provided by HUD showing (by census tract and block group) the Estimated Foreclosure Abandonment Risk Scores and the Predicted 18-month Underlying Problem Foreclosure Rates. Commerce City also used Federal Reserve Home Mortgage Disclosure Act (HMDA) data showing the percent of all loans made between 2004 and 2006 that are high cost and USPS data identifying residential addresses that have been vacant for 90 days or longer as of June. Based on that data, Census Tracts 87.03, 87.05, 87.06, 88.01, and 89.01 were identified as the areas with the greatest need where we will target our initial efforts under this program. These census tracts incorporate most of the older, historic part of the city.*

*The above risk factors for northern part of the city (all located within Census Tract 85.12) are slightly lower; however, that area has experienced the highest ratio of foreclosures to existing homes of any area within Adams County. Also, the homes within Census Tract 85.12 are typically priced from \$200,000 to \$900,000, putting them above a reasonable price range for those making an income less than 120%. We are requesting additional funding to target this area through another application, but without additional funding from the State of Colorado, will continue to focus primarily within the census tracts listed in the above paragraph.*

#### **City of Thornton**

*The City of Thornton proposes to use the Neighborhood Stabilization Program (NSP) funds to support neighborhood revitalization efforts in south Thornton. The Thornton City Council has identified neighborhood stabilization in this area as their top priority; this includes addressing the impact of foreclosures and focusing efforts on revitalizing this area, including developing neighborhood groups that work to enhance the visual appeal of the neighborhood, commercial redevelopment and streetscape improvements as follows:*

##### *Neighborhood Target Areas*

*The City of Thornton has chosen neighborhoods bordered by 104th, Washington, 88th, and Welby Road as the target areas for NSP. These include Census Tracts 9101, 9104, 9202, 9204, and 9205. Justification for these areas is based upon the following indicators of destabilization: existing data from the Comprehensive Plan, demographic profiles from the census, foreclosure data provided by ACCD, and areas already identified by the city for neighborhood revitalization.*

##### *History of Targeted Area*

*The City of Thornton began as a bedroom community to Denver in April 1953. Hoffman Homes opened three model homes, located just off Washington Street at this time. These homes were developed for GIs returning from the War and wanting to start a family.*

*These homes were attractive, solid brick construction home in a planned community. A young GI could purchase the new home with a low-interest loan guaranteed by the federal government.*

Today, these homes provide the opportunity for new families to start their life. The City of Thornton would like to bring these homes up to present day building code, thereby continuing to offer young families and adults who fall into the lower income brackets the opportunity to own a home and become a part of the community. Please note that this is not the primary purpose for selecting these neighborhoods. These neighborhoods were selected because they have been identified by the city (through an evaluation process noted above) as areas that are in the greatest need. Some of these homes in the target census tracts have been vandalized, with copper pipes and other basic systems stolen. The City first evaluated data provided by HUD for the LMMI Benefit with Abandonment/Foreclosure Risk Data Set.

Five census tracts were identified and had a score of 8-10, indicating areas of greatest need. In addition, the City utilized a variety of internal and external sources to identify areas that the NSP could have the greatest impact in improving neighborhood stabilization including areas identified in the Thornton Comprehensive Plan as a high priority for “renovation and reinvestment”. This study involved an extensive evaluation of many factors including age of housing, housing value per unit, housing value per square foot, ratio of land value to total value, size of houses, occupancy type, median household income, population over age 65, code violations, and a windshield survey – criteria and indicators that are precisely related to neighborhood stabilization. Other issues that place a role in how Thornton identified its target areas include:

#### *Location of Foreclosed Homes*

The majority of Census Tract 85.21 resides outside of the boundaries of the City of Thornton. In evaluating the foreclosure data as depicted on the map in the original county NSP Action Plan, out of the total housing units of 515, only 56 of the foreclosed homes were in Thornton. This is not a high percentage compared to the other areas that were selected where 109 homes were vacant due to foreclosure.

#### *Higher Incomes in Census Tracts*

In Census Tract 85.21, based upon the 2000 Census, the average household median income is \$82,565. This income range would not qualify for any of the HUD income guidelines. Using the HUD AMI for a 3-person household which is the average household size in Thornton, gives the following income qualification levels:

-120% AMI is \$77,550

-50% AMI is \$32,300

#### *Higher Price of Homes in Census Tracts*

Using MLS data from 12/18/08 and overlaying the locations of foreclosure data, we have provided a sample of the asking price and sold price of homes in Census Tract 85.21:

-Springvale Subdivision - \$319,000 / \$308,000

-Riverdale Park - \$329,950 / \$320,000

-Quebec Riverdale - \$294,900 / \$276,000

This is in comparison with the average cost of a home in original Thornton (the targeted areas mentioned above) ranging from \$70,000 to \$100,000.

### **City of Northglenn**

*Section 2301 (c) (2) of HERA requires that the distribution and use of the NSP funds be in: areas that have the greatest percentage of home foreclosures, that have the highest percentage of homes financed by a subprime mortgage related loans, and that have been identified as likely to face a significant rise in the rate of home foreclosures.*

*These factors were included and used in the analysis of the Northglenn data and are detailed in the above chart. The census tracts are ranked accordingly to the available data. Census Tract 85.05 has the greatest need, followed by 85.07, 93.04, 85.33 and 85.06.*

*The goal in Northglenn is to restore the physical livability of targeted neighborhoods in the above mentioned census tracts. Homes and project sites will be strategically selected with regard to their overall impact on neighborhood stability. Northglenn will spur private investment once there are successful sales that establish spreads available for investment. Also, the rehabilitation and sale of distressed properties to new families will provide assurance to existing homeowners that the City has not forgotten them and is working to stabilize and improve their neighborhoods and property values. This will likely bring about investment by these homeowners in their homes which will also add to the improvement and value of the neighborhood.*

#### **Unincorporated Adams County**

*Target areas in unincorporated Adams County include the neighborhoods of Berkeley, Welby, Sherrelwood, Twin Lakes (Perl Mack neighborhood) and Derby. These comprise some of the poorest neighborhoods in Adams County. For the past five years Adams County Community Development has been working with local residents to establish neighborhood organizations to function as conduits for neighborhood-based improvements. These groups will provide valuable vision, leadership and commitment to neighborhood stabilization projects. There are formally recognized neighborhood groups in Berkeley, and Twin Lakes/Perl Mack with leadership contacts established in Sherrelwood. The Derby neighborhood has a high number of foreclosures, abandonment rates and foreclosure rates.*

#### **City of Brighton**

*Census Tract 8606 has been identified as having the highest number of foreclosures, rate of foreclosures and risk factors. Although Census Tract 8522 within Brighton has a high incidence of foreclosure, the range of home prices is between \$144,900 and \$324,900. With this area's easy accessibility and lack of overwhelming rehabilitation needs, ACCD plans to focus the NSP funds in more deteriorated areas less likely to rebound without the help of the Neighborhood Stabilization Program.*

#### **City of Federal Heights**

*The Economic Development staff from the City of Federal Heights has identified specific projects in adjacent Census Tracts 9318 and 9319 as priority areas where the limited NSP funds will have a higher potential for impact in the neighborhood due to the visibility and exposure of selected properties. Over the five-year period of the NSP, the City of Federal Heights will work within all three census tracts in response to the stabilization needs of the community. Census tract 9319 has been identified as having the highest number of foreclosures, rate of foreclosures and risk factors. Most of the foreclosures in this census tract are mobile homes in private mobile home parks and are more problematic since the mobile homes are subject to repossession. ACCD and Federal Height's staff will seek to identify an appropriate impact strategy in response to this phenomenon.*

## **B. DISTRIBUTION AND USES OF FUNDS**

From 2009-2013, Adams County programmed NSP1 funding toward the acquisition and rehabilitation of single-family housing, home buyer assistance, and multi-family housing rehabilitation. However, the ability to acquire, rehabilitate, and resell properties in Adams County has become increasingly difficult. Adams County is therefore shifting its funding to assist in land acquisition for the creation of affordable multi-family housing that will result in the creation of over 200 affordable rental units.

Adams County's primary goal in utilizing NSP funds is to increase housing options in local communities, targeting the national objective of households at or below 50% of the area median income (AMI). As the single-family housing market grows in Adams County, homeownership is not possible for very-low-income households. Adams County is reacting to the market shift by turning its attention with NSP activities to the multi-family housing market. By using NSP funds to help develop multi-family housing, Adams County hopes to create more housing opportunities for very-low income families.

Adams County has prioritized the use of the NSP funds by first targeting the acquisition of foreclosed properties in neighborhoods with the highest concentration of subprime mortgage loans and at the highest risk of additional foreclosures, as confirmed through data provided by HUD and the county's own data on foreclosures. The initially targeted areas will be in those neighborhoods that meet the criteria above.

The funds will be used in these primary activities, plus administration:

- As a financing mechanism to ensure affordability (soft seconds, interest buy downs, loan guarantees, and/or a loan loss reserve) primarily for families buying units that have been rehabilitated through this program;
- Acquisition/rehabilitation and resale;
- Acquisition/rehabilitation and resale to those families at or below 50% of AMI;
- Acquisition/redevelopment of units that would cost more to rehabilitate than the purchase price;
- Redevelopment of demolished or vacant properties for new construction of multifamily housing;
- Administration of the program which will not exceed 10% of the NSP grant and 10% of any program income.

### ***Financing Mechanism***

As defined in the NSP regulations, down payment assistance and/or other financing mechanisms are permissible uses of the NSP funds. It is anticipated that most, if not all of the units acquired/rehabilitated and sold to first-time homebuyers will require some form of gap financing to ensure affordability. Additionally, NSP funds may be used to buy down the interest rate on the first trust deed for the acquisition of properties by income-eligible homebuyers that are not also being rehabilitated. The buy-down option is not anticipated to represent many units.

### ***Acquisition/Rehabilitation and Resale***

Adams County will acquire and rehabilitate foreclosed, abandoned single family units and sell them to income-eligible first-time homebuyers (individuals and families that have not owned real property in the previous three years). This will be done through a combination of leverages, and partnered and direct purchases. The final sale price will be no greater than the initial acquisition and rehabilitation costs. All acquisitions will be made for at least 5% below an appraised value determined no more than 60 days prior to the date of the offer to purchase with the aggregate of the portfolio of acquisitions made for at least 15% below an appraised value.

Prospective buyers of these homes must be income qualified, not to exceed 120% of the Area Median Income (AMI) as defined by HUD. In addition prospective buyers of these homes will be required to attend both pre-acquisition and post-acquisition homebuyer counseling as provided by the Adams County Housing Authority or another HUD certified housing counseling agency.

### ***Acquisition/Rehabilitation/Rental***

This activity will consist of rent-to-own units, basic affordable rental units, and multi-family rental units for households earning at or below 50% of AMI. Depending on the pool of applicants for the purchase of the rehabilitated units, there may be some that have adequate income but lack an appropriate credit score to be able to purchase at this time. The Adams County Housing Authority or other designated sub-recipient would take title to the unit, and lease the unit in a rent-to-own scenario. Enrollment with a credit counseling program by a HUD certified agency would be mandatory, and a portion of the rent would be set aside to start collecting as a down payment. All units will be made available at affordable rental rates for households at all income levels up to 120% AMI.

For the required 25% of NSP funds which need to be used to serve individuals and families at or below 50% AMI, Adams County will use the funds in acquisition/ rehabilitation/rental activities primarily to serve families at or below 50% AMI and/or special needs clients when those clients meet the income qualifications defined by the program. These funds will be utilized for acquisition/rehabilitation of multi-family units in partnership with non-profit housing developers. Typically, title to the property would be transferred to a designated agency for sustainable affordable housing such as a nonprofit organization. Where possible, these units will be used to augment the special needs housing categories such as the elderly and the disabled for those who meet the required income qualifications.

### ***Acquisition/Demolition/Redevelopment***

In certain instances, the condition of specific units may warrant demolition instead of rehabilitation. In such cases where the rehabilitation costs exceed the acquisition costs, staff would consult with the County's Building Officials regarding the structural soundness of the house. If deemed appropriate, demolition would occur. Plans to develop the parcel as an infill unit or units would commence immediately.

### ***Demolition of Blighted Structures***

Though not a high priority, in particular the first year of this program, it is assumed that some structures will have been vacated and blighted prior to the abandonment. Once deemed blighted in accordance with local law, these structures will be demolished and the land made available to redevelop.

### ***Land Banking***

Depending on opportunities within the market, Adams County may elect to purchase properties and hold them for a period of up to ten years as per NSP08.03.

### ***Redevelopment of Demolished or Vacant Property for New Construction of Rental Housing***

This activity will seek to provide funding for the redevelopment of demolished or vacant property to be used for the development of multi-family rental housing. All units created will be made available at affordable rental rates for households at all income levels up to 120% AMI. All acquisitions will be made for at least 5% below the appraised value.

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### ***Administration***

Ten percent, or \$460,211, of the Adams County's NSP allocation can be used for administration purpose. Adams County will make use of the entirety of these funds to contract project-designated staff for the duration of the NSP as well as to cover operational supplies, materials and equipment. It is further anticipated that a 10 percent portion of any program income will be used to cover direct project-related costs incurred by ACCD.

### ***Program Income***

Throughout the five-year program period, Adams County will continually reinvest returned income from the program back into the program. Reinvestment of program income will follow all HUD Neighborhood Stabilization Program objectives as well as addressing the foreclosure and stabilization needs of Adams County at the time of program income return.

Adams County will include program income provisions with all contracts and agreements with sub-grantees as well as participating Adams County cities. This will ensure consistent and transparent administration of NSP program income when applicable. Sub-grantee and participating Adams County cities will be subject to monitoring by Adams County to ensure proper administration and usage of program income.

### ***Distribution of Funds to Sub-recipients***

Adams County's Neighborhood Stabilization Program Amendment was the result of significant interaction between ACCD staff and staff of the municipalities where foreclosure impact has been the highest. ACCD and city staff will continue to function as a committee through which the NSP will be coordinated. In partnership with ACCD staff, city officials will continue to play a key role in the project identification phase, determining the neighborhoods, properties and the scope of work for each project as well as tracking the impact of each project. This NSP Committee will review project proposals from sub-recipients to ensure the proposals are keeping with the NSP objectives, thus decisions related to the NSP with regards to allocations to sub-recipients will be made by the county with significant input from the city staff. Contracts with sub-recipients will be with Adams County.

With regards to the selection process of sub-recipients, ACCD is working with the state of Colorado, Aurora, and the City of Denver to establish common procedures. ACCD will employ a process that is open, fair and objective. The process will consist of a public notice, an application format that is standardized, with clear selection criteria and screening of applications. The NSP Committee mentioned above (with the county in the lead role) will review each application and make allocation decisions based on specific criteria. Criteria will include but not be limited: to the core competency of each agency, track record in the project area they applying for, financial stability, relevance of the proposal to the target areas and stated county/city priorities, the cost effectiveness of the project and the amount of non-NSP funds leveraged or committed. For other services and contractors, the NSP Committee and its sub-recipients will make use of RFQ and bidding procedures in keeping with county and HUD policy.

### **C. DEFINITIONS AND DESCRIPTIONS**

(1) Definition of “blighted structure” in context of state or local law: Adams County and its partnering cities use the State of Colorado’s definition of blight as found in the Colorado Revised Statutes 31-25-103.

(2) Definition of “affordable rents”: For any NSP-funded rental activity, “affordable rents” shall be defined as 30% of the household’s adjusted income, less utility allowances as adopted by the Adams County Housing Authority for the Section 8 program, as appropriate. The maximum Affordable Rents shall not exceed the Fair Market Rents (FMR) as published annually by the U.S. Department of Housing and Urban Development for each county in Colorado.

(3) To ensure continued affordability ACCD uses the definition of affordable rents, rent schedule and utility allowances, affordability period and continued affordability as provided by HUD in 24 CFR 92.25 sections (a), (c), (e), (f) as well as 92.252(c).

Specifically:

(a) Rent limitation. HUD provides the following maximum HOME rent limits. The maximum HOME rents are the lesser of:

- (1) The fair market rent for existing housing for comparable units in the area as established by HUD under 24 CFR 888.111; or
- (2) A rent that does not exceed 30 percent of the adjusted income of a family whose annual income equals 65 percent of the median income for the area, as determined by HUD, with adjustments for number of bedrooms in the unit. The HOME rent limits provided by HUD will include average occupancy per unit and adjusted income assumptions.

(b) Initial rent schedule and utility allowances. The participating jurisdiction must establish maximum monthly allowances for utilities and services (excluding telephone). The participating jurisdiction must review and approve rents proposed by the owner for units subject to the maximum rent limitations in paragraphs (a) or (b) of this section. For all units subject to the maximum rent limitations in paragraphs (a) or (c) of this section for which the tenant is paying utilities and services, the participating jurisdiction must ensure that the rents do not exceed the maximum rent minus the monthly allowances for utilities and services.

(c) Periods of Affordability. The HOME-assisted units must meet the affordability requirements for not less than the applicable period specified in the following table, beginning after project completion. The affordability requirements apply without regard to the term of any loan or mortgage or the transfer of ownership. They must be imposed by deed restrictions, covenants running with the land, or other mechanisms approved by HUD, except that the affordability restrictions may terminate upon foreclosure or transfer in lieu of foreclosure. The participating jurisdiction may use purchase options, rights of first refusal or other preemptive rights to purchase the housing before foreclosure or deed in lieu of foreclosure to preserve affordability. The affordability restrictions shall be revived according to the original terms if, during the original affordability period, the owner of record before the foreclosure, or deed in lieu of foreclosure, or any entity that includes the former owner or those with whom the former owner has or had family or business ties, obtains an ownership interest in the project or property.

Rehabilitation or acquisition of existing housing per unit amount of HOME funds:

- \$15,000 per unit and under = 5 years
- \$15,001 to \$40,000 = 10 years



- \$40,001 and above = 15 years
- New construction or acquisition of newly constructed housing = 20 years

(d) Subsequent rents during the affordability period. The maximum HOME rent limits are recalculated on a periodic basis after HUD determines fair market rents and median incomes. HUD then provides the new maximum HOME rent limits to participating jurisdictions. Regardless of changes in fair market rents and in median income over time, the HOME rents for a project are not required to be lower than the HOME rent limits for the project in effect at the time of project commitment.

(4) Describe housing rehabilitation standards that will apply to NSP assisted activities: The NSP funds will use the Adams County standards from its Homeowner Occupied Rehabilitation Program known as the Home Improvement Program.

*Code / Health & Safety Repairs* – The first priority of the Housing Rehab Program is to eliminate, or otherwise “cure” any and all pre-existing Code violations and Health & Safety hazards. Therefore, all rehab projects must correct any pre-existing code deficiencies and/or health & safety related repairs needed. This includes preexisting construction found that was done without permits (room additions, garage conversions, patio additions, etc). All such pre-existing construction must be either brought up to code and obtain approved building permits, or must be demolished, as part of the rehab project.

*Lead Based Paint Hazards* – An additional priority of the Housing Rehabilitation Program is to reduce any lead-based paint hazards present in homes. A Lead-Based Paint test (XRF testing) and a Risk Assessment are required on all rehabilitation projects to identify the existence and scope of any lead-based paint hazards in the home. The standards of “Lead-Based Paint Poisoning Prevention in Federally Owned and Federally Assisted Housing” found at 24 CFR Part 35 apply.

*General Property Improvements* – Once the cost of repairing all code deficiencies, health and safety items, lead-based paint hazards, and termite repairs are totaled up, then any additional program funding may be used to address general property improvements. General property improvements may include a wide variety of items such as painting, replacement of fixtures, replacement of cabinets and vanities, replacement of flooring, etc. General property improvements may NOT include any materials or items that are of a type and quality which exceeds the standards for similar properties in the area, or that far exceed the basic standards of “decent, safe, and sanitary housing.” The minimally acceptable standards may be found at 24 CFR 983.101.

#### ***D. LOW INCOME TARGETING***

For the 2008 Neighborhood Stabilization Program, Adams County has received \$4,600,211 to address neighborhood stabilization activities in our community. Adams County will use no less than \$1,150,052.75 of the NSP allocation to cover eligible investments towards eligible activities benefiting individuals and/or families whose incomes do not exceed 50% of area median income. The responsibility of conducting these activities will be shared by all jurisdictions within the entitlement community of Adams County. The primary mechanism by which this will be achieved is through Multi-Family Acquisition/Rehab/Redevelopment/Rental. We will also seek opportunities with Single Family Acquisition/Rehab/Redevelopment.

#### ***E. ACQUISITION AND RELOCATION***

Adams County does intend to address some blight conditions by demolishing and redeveloping vacant and foreclosed residential properties. This activity will be limited and the County estimates that approximately five properties annually will be involved in this activity over the course of the program. It is expected that the density will be increased and throughout the five-year course of this program an estimated 50 families will benefit from this activity. It is also expected that all of the families will be at or below 120% AMI, and that roughly 50% of families will be at or below 50% AMI.

***F. PUBLIC COMMENT (NSP1)***

Adams County Community Development posted the initial plan for a fifteen-day public comment period on Thursday, November 13, 2008 through publication in the local Northglenn-Thornton Sentinel and by posting it to the Adams County website. Public comments received during this time can be viewed in Attachment A.

All public comments were considered before final submission of the amendment to HUD. The Board of County Commissioners ratified the NSP substantial amendment on November 24, 2008.

The First Substantial Amendment to the Action Plan was posted for a fifteen-day public comment period on Thursday, July 8, 2010 through publication in the local Northglenn-Thornton Sentinel and by posting it to the Adams County website. No public comments were received.

An Amendment to the Action Plan was posted for a thirty-day comment period in the Westminster Window and Northglenn-Thornton Sentinel on March 28 and in the Brighton Blade on March 29 and by posting it to the Adams County website. The amendment was passed by on May 1 by the Adams County Board of County Commissioners. No public comments were received.

A third Substantial Amendment to the Action Plan was posted for a thirty-day comment period in the Westminster Window and Northglenn-Thornton Sentinel on December 13, 2018 and by posting it to the Adams County Website. The amendment was passed on July 23, 2019 by the Adams County Board of County Commissioners. No public comments were received.

# **Adams County**

## **NSP3 Substantial Amendment**

**Jurisdiction(s): Adams County, Colorado**  
**Lead Agency: Adams County**  
**NSP Contact Person: Community Development Manager**  
**Address: 4430 S. Adams County Pkwy., Brighton, CO 80601**  
**Telephone: (720) 523-6200**

### ***A. Summary of Distribution and Uses of NSP Funds***

Adams County, Colorado is located in the Denver metropolitan area. The county's current population of nearly 500,000 residents is spread out over 1,182 square miles with the majority of the population concentrated on the western third of the county. The county contains a diverse mix of land uses varying from older first-ring cities and new green-field suburbs to expanses of open rangeland. All or portions of nine municipalities are found in Adams County. The City and County of Denver is contiguous to our southern border.

Roughly 100,000 residents live in unincorporated Adams County with the majority of the population living in the cities of Northglenn, Thornton, Westminster, Brighton, Commerce City, Aurora, Arvada and Federal Heights. The towns of Bennett, Strasburg and Watkins are located in the eastern plains and are predominately agricultural, but rapidly urbanizing communities. All communities with the exception of Commerce City, Thornton, Westminster, Arvada and Aurora (which are their own entitlement communities) participate in the Urban County partnership jurisdiction.

The poverty in Adams County is around 13%. Populations with low-incomes and living in poverty are concentrated in a number of locations throughout the county. These locations are largely found in the southwestern portion of the county including Aurora, Commerce City, the older communities of unincorporated Adams County, and portions of the older neighborhoods of Thornton, Federal Heights, Northglenn and Brighton.

Due to the dramatic levels of foreclosures in Adams County during the Great Recession (2007-2012), Adams County Community Development (ACCD) and other partner agencies such as the Adams County Housing Authority (now known as Unison Housing Partners), city representatives from Northglenn, Thornton, Brighton, Commerce City, various non-profits and the County Public Trustee formed a foreclosure task force towards the end of 2007. The task force began mapping foreclosures, identifying effective strategies and coordinating the marketing of foreclosure prevention workshops implemented by the housing authority.

In recent years, the housing market has improved, resulting in a dramatic decline in the number of foreclosures in Adams County. The current real estate market conditions and NSP eligibility requirements have made it difficult to acquire and rehabilitate single-family homes as the county has done in the past with its NSP funds. Therefore, the county is pursuing new means of developing affordable housing through the acquisition and redevelopment of demolished or vacant properties, as per NSP's Eligible Use E. The need for affordable housing has been identified in the 2017 Adams County Housing Needs Assessment, citing the increasing disparity between incomes housing costs, known as the "affordability gap"

[http://www.adcogov.org/sites/default/files/Adams\\_County\\_Housing\\_Needs\\_Assessment\\_11-8%20edit.pdf](http://www.adcogov.org/sites/default/files/Adams_County_Housing_Needs_Assessment_11-8%20edit.pdf)).

While the **original** 2008 NSP1 Action Plan included the following information (using HUD data) to identify the initial priority areas, the market has changed substantially in the County a decade later; however, these were the original identified areas of greatest needs:

#### **City of Commerce City**

*For purposes of determining the areas of greatest need within the city's boundaries, Commerce City used data provided by HUD showing (by census tract and block group) the Estimated Foreclosure Abandonment Risk Scores and the Predicted 18-month Underlying Problem Foreclosure Rates. Commerce City also used Federal Reserve Home Mortgage Disclosure Act (HMDA) data showing the percent of all loans made between 2004 and 2006 that are high cost and USPS data identifying residential addresses that have been vacant for 90 days or longer as of June. Based on that data, Census Tracts 87.03, 87.05, 87.06, 88.01, and 89.01 were identified as the areas with the greatest need where we will target our initial efforts under this program. These census tracts incorporate most of the older, historic part of the city.*

*The above risk factors for northern part of the city (all located within Census Tract 85.12) are slightly lower; however, that area has experienced the highest ratio of foreclosures to existing homes of any area within Adams County. Also, the homes within Census Tract 85.12 are typically priced from \$200,000 to \$900,000, putting them above a reasonable price range for those making an income less than 120%. We are requesting additional funding to target this area through another application, but without additional funding from the State of Colorado, will continue to focus primarily within the census tracts listed in the above paragraph.*

#### **City of Thornton**

*The City of Thornton proposes to use the Neighborhood Stabilization Program (NSP) funds to support neighborhood revitalization efforts in south Thornton. The Thornton City Council has identified neighborhood stabilization in this area as their top priority; this includes addressing the impact of foreclosures and focusing efforts on revitalizing this area, including developing neighborhood groups that work to enhance the visual appeal of the neighborhood, commercial redevelopment and streetscape improvements as follows:*

##### *Neighborhood Target Areas*

*The City of Thornton has chosen neighborhoods bordered by 104th, Washington, 88th, and Welby Road as the target areas for NSP. These include Census Tracts 9101, 9104, 9202, 9204, and 9205. Justification for these areas is based upon the following indicators of destabilization: existing data from the Comprehensive Plan, demographic profiles from the census, foreclosure data provided by ACCD, and areas already identified by the city for neighborhood revitalization.*

##### *History of Targeted Area*

*The City of Thornton began as a bedroom community to Denver in April 1953. Hoffman Homes opened three model homes, located just off Washington Street at this time. These homes were developed for GIs returning from the War and wanting to start a family.*

*These homes were attractive, solid brick construction home in a planned community. A young GI could purchase the new home with a low-interest loan guaranteed by the federal government.*

Today, these homes provide the opportunity for new families to start their life. The City of Thornton would like to bring these homes up to present day building code, thereby continuing to offer young families and adults who fall into the lower income brackets the opportunity to own a home and become a part of the community. Please note that this is not the primary purpose for selecting these neighborhoods. These neighborhoods were selected because they have been identified by the city (through an evaluation process noted above) as areas that are in the greatest need. Some of these homes in the target census tracts have been vandalized, with copper pipes and other basic systems stolen. The City first evaluated data provided by HUD for the LMMI Benefit with Abandonment/Foreclosure Risk Data Set.

Five census tracts were identified and had a score of 8-10, indicating areas of greatest need. In addition, the City utilized a variety of internal and external sources to identify areas that the NSP could have the greatest impact in improving neighborhood stabilization including areas identified in the Thornton Comprehensive Plan as a high priority for “renovation and reinvestment”. This study involved an extensive evaluation of many factors including age of housing, housing value per unit, housing value per square foot, ratio of land value to total value, size of houses, occupancy type, median household income, population over age 65, code violations, and a windshield survey – criteria and indicators that are precisely related to neighborhood stabilization. Other issues that place a role in how Thornton identified its target areas include:

#### *Location of Foreclosed Homes*

The majority of Census Tract 85.21 resides outside of the boundaries of the City of Thornton. In evaluating the foreclosure data as depicted on the map in the original county NSP Action Plan, out of the total housing units of 515, only 56 of the foreclosed homes were in Thornton. This is not a high percentage compared to the other areas that were selected where 109 homes were vacant due to foreclosure.

#### *Higher Incomes in Census Tracts*

In Census Tract 85.21, based upon the 2000 Census, the average household median income is \$82,565. This income range would not qualify for any of the HUD income guidelines. Using the HUD AMI for a 3-person household which is the average household size in Thornton, gives the following income qualification levels:

-120% AMI is \$77,550

-50% AMI is \$32,300

#### *Higher Price of Homes in Census Tracts*

Using MLS data from 12/18/08 and overlaying the locations of foreclosure data, we have provided a sample of the asking price and sold price of homes in Census Tract 85.21:

-Springvale Subdivision - \$319,000 / \$308,000

-Riverdale Park - \$329,950 / \$320,000

-Quebec Riverdale - \$294,900 / \$276,000

This is in comparison with the average cost of a home in original Thornton (the targeted areas mentioned above) ranging from \$70,000 to \$100,000.

### **City of Northglenn**

*Section 2301 (c) (2) of HERA requires that the distribution and use of the NSP funds be in: areas that have the greatest percentage of home foreclosures, that have the highest percentage of homes financed by a subprime mortgage related loans, and that have been identified as likely to face a significant rise in the rate of home foreclosures.*

*These factors were included and used in the analysis of the Northglenn data and are detailed in the above chart. The census tracts are ranked accordingly to the available data. Census Tract 85.05 has the greatest need, followed by 85.07, 93.04, 85.33 and 85.06.*

*The goal in Northglenn is to restore the physical livability of targeted neighborhoods in the above mentioned census tracts. Homes and project sites will be strategically selected with regard to their overall impact on neighborhood stability. Northglenn will spur private investment once there are successful sales that establish spreads available for investment. Also, the rehabilitation and sale of distressed properties to new families will provide assurance to existing homeowners that the City has not forgotten them and is working to stabilize and improve their neighborhoods and property values. This will likely bring about investment by these homeowners in their homes which will also add to the improvement and value of the neighborhood.*

#### **Unincorporated Adams County**

*Target areas in unincorporated Adams County include the neighborhoods of Berkeley, Welby, Sherrelwood, Twin Lakes (Perl Mack neighborhood) and Derby. These comprise some of the poorest neighborhoods in Adams County. For the past five years Adams County Community Development has been working with local residents to establish neighborhood organizations to function as conduits for neighborhood-based improvements. These groups will provide valuable vision, leadership and commitment to neighborhood stabilization projects. There are formally recognized neighborhood groups in Berkeley, and Twin Lakes/Perl Mack with leadership contacts established in Sherrelwood. The Derby neighborhood has a high number of foreclosures, abandonment rates and foreclosure rates.*

#### **City of Brighton**

*Census Tract 8606 has been identified as having the highest number of foreclosures, rate of foreclosures and risk factors. Although Census Tract 8522 within Brighton has a high incidence of foreclosure, the range of home prices is between \$144,900 and \$324,900. With this area's easy accessibility and lack of overwhelming rehabilitation needs, ACCD plans to focus the NSP funds in more deteriorated areas less likely to rebound without the help of the Neighborhood Stabilization Program.*

#### **City of Federal Heights**

*The Economic Development staff from the City of Federal Heights has identified specific projects in adjacent Census Tracts 9318 and 9319 as priority areas where the limited NSP funds will have a higher potential for impact in the neighborhood due to the visibility and exposure of selected properties. Over the five-year period of the NSP, the City of Federal Heights will work within all three census tracts in response to the stabilization needs of the community. Census tract 9319 has been identified as having the highest number of foreclosures, rate of foreclosures and risk factors. Most of the foreclosures in this census tract are mobile homes in private mobile home parks and are more problematic since the mobile homes are subject to repossession. ACCD and Federal Height's staff will seek to identify an appropriate impact strategy in response to this phenomenon.*

## **B. HOW FUND USE ADDRESSES MARKET CONDITIONS**

Adams County has historically programmed NSP3 funding (2011-present) toward the acquisition and rehabilitation of single-family housing. Since 2017, the ability to acquire, rehabilitate, and resell properties in Adams County has become increasingly difficult. Adams County is therefore shifting its funding to assist in land acquisition for the creation of affordable multi-family housing.

Adams County's primary goal in utilizing NSP funds is to increase housing options in local communities, targeting the national objective of households at or below 50% of the area median income (AMI). As the single-family housing market grows in Adams County, homeownership is not possible for very-low-income households. Adams County is reacting to the market shift by turning its attention with NSP activities to the multi-family housing market. By using NSP funds to help develop multi-family housing, Adams County hopes to create more housing opportunities for very-low income families.

Adams County has prioritized the use of the NSP funds by first targeting the acquisition of foreclosed properties in neighborhoods with the highest concentration of subprime mortgage loans and at the highest risk of additional foreclosures, as confirmed through data provided by HUD and the county's own data on foreclosures. The county will use HUD's NSP3 Mapping Tool (<https://www.hudexchange.info/resource/669/nsp3-mapping-tool/>) to determine the NSP needs score for each target area. NSP projects will be in those neighborhoods that meet the criteria above.

The funds will be used in these primary activities, plus administration:

- As a financing mechanism to ensure affordability (soft seconds, interest buy downs, loan guarantees, and/or a loan loss reserve) primarily for families buying units that have been rehabilitated through this program;
- Acquisition/rehabilitation and resale;
- Acquisition/rehabilitation and resale to those families at or below 50% of AMI;
- Acquisition/redevelopment of units that would cost more to rehabilitate than the purchase price;
- Redevelopment of demolished or vacant properties for new construction of multifamily housing;
- Administration of the program which will not exceed 10% of the NSP grant and 10% of any program income.

#### ***Financing Mechanism***

As defined in the NSP regulations, down payment assistance and/or other financing mechanisms are permissible uses of the NSP funds. It is anticipated that most, if not all of the units acquired/rehabilitated and sold to first-time homebuyers will require some form of gap financing to ensure affordability. Additionally, NSP funds may be used to buy down the interest rate on the first trust deed for the acquisition of properties by income-eligible homebuyers that are not also being rehabilitated. The buy-down option is not anticipated to represent many units.

#### ***Acquisition/Rehabilitation and Resale***

Adams County will acquire and rehabilitate foreclosed, abandoned single family units and sell them to income-eligible first-time homebuyers (individuals and families that have not owned real property in the previous three years). This will be done through a combination of leverages, and partnered and direct purchases. The final sale price will be no greater than the initial acquisition and rehabilitation costs. All acquisitions will be made for at least 5% below an appraised value determined no more than 60 days prior to the date of the offer to purchase with the aggregate of the portfolio of acquisitions made for at least 15% below an appraised value.

Prospective buyers of these homes must be income qualified, not to exceed 120% of the Area Median Income (AMI) as defined by HUD. In addition prospective buyers of these homes will be required to attend both pre-acquisition and post-acquisition homebuyer counseling as provided by the Adams County Housing Authority or another HUD certified housing counseling agency.

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#### ***Demolition of Blighted Structures***

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#### ***Land Banking***

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#### ***Redevelopment of Demolished or Vacant Property for New Construction of Rental Housing***

This activity will seek to provide funding for the redevelopment of demolished or vacant property to be used for the development of multi-family rental housing. All units created will be made available at affordable rental rates for households at all income levels up to 120% AMI. All acquisitions will be made for at least 5% below the appraised value.



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### ***Program Income***

Throughout the five-year program period, Adams County will continually reinvest returned income from the program back into the program. Reinvestment of program income will follow all HUD Neighborhood Stabilization Program objectives as well as addressing the foreclosure and stabilization needs of Adams County at the time of program income return.

Adams County will include program income provisions with all contracts and agreements with sub-grantees as well as participating Adams County cities. This will ensure consistent and transparent administration of NSP program income when applicable. Sub-grantee and participating Adams County cities will be subject to monitoring by Adams County to ensure proper administration and usage of program income.

### ***Distribution of Funds to Sub-recipients***

Adams County's Neighborhood Stabilization Program Amendment was the result of significant interaction between ACCD staff and staff of the municipalities where foreclosure impact has been the highest. ACCD and city staff will continue to function as a committee through which the NSP will be coordinated. In partnership with ACCD staff, city officials will continue to play a key role in the project identification phase, determining the neighborhoods, properties and the scope of work for each project as well as tracking the impact of each project. This NSP Committee will review project proposals from sub-recipients to ensure the proposals are keeping with the NSP objectives, thus decisions related to the NSP with regards to allocations to sub-recipients will be made by the county with significant input from the city staff. Contracts with sub-recipients will be with Adams County.

With regards to the selection process of sub-recipients, ACCD is working with the state of Colorado, Aurora, and the City of Denver to establish common procedures. ACCD will employ a process that is open, fair and objective. The process will consist of a public notice, an application format that is standardized, with clear selection criteria and screening of applications. The NSP Committee mentioned above (with the county in the lead role) will review each application and make allocation decisions based on specific criteria. Criteria will include but not be limited: to the core competency of each agency, track record in the project area they applying for, financial stability, relevance of the proposal to the target areas and stated county/city priorities, the cost effectiveness of the project and the amount of non-NSP funds

leveraged or committed. For other services and contractors, the NSP Committee and its sub-recipients will make use of RFQ and bidding procedures in keeping with county and HUD policy.

### ***C. ENSURING CONTINUED AFFORDABILITY***

Adams County uses affordability periods set forth in 24 CFR 92.252(a), (c) (e) and (f), and 92.254. NSP-assisted housing must meet the affordability requirements for not less than the applicable period specified as follows, beginning after project completion:

- \$15,000 per unit and under = 5 years
- \$15,001 to \$40,000 = 10 years
- \$40,001 and above = 15 years
- New construction = 20 years

### ***D. DEFINITION OF BLIGHTED STRUCTURE***

(1) Definition of “blighted structure” in context of state or local law: Adams County and its partnering cities use the State of Colorado’s definition of blight as found in the Colorado Revised Statutes 31-25-103.

### ***E. DEFINITION OF AFFORDABLE RENTS***

Rents that are the lesser of the Housing Choice Voucher (Section 8) Fair Market Rents periodically established by the U.S. Department of Housing and Urban Development, or rents which are 30 percent of adjusted income for households up to 120% of Area Median Income, minus tenant paid utilities.

### ***F. HOUSING REHABILITATION/NEW CONSTRUCTION STANDARDS***

Any entity receiving funds where housing rehabilitation is proposed will be required to verify that they have adopted written Rehabilitation Standards.

All construction projects assisted with NSP funds must meet local codes, rehabilitation standards, ordinances, and zoning ordinances.

Additionally, the following requirements apply to housing receiving NSP3 funding for new construction:

- Buildings up to three stories must be designed to meet the standard for Energy Star Qualified New Homes.
- Buildings of mid- or high-rise multifamily housing must be designed to meet American Society of Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) Standard 90.1-2004, Appendix G plus 20 percent.
- Water efficient toilets, showers, and faucets must be installed.
- Where relevant, the housing should be improved to mitigate the impact of disasters (e.g., earthquake, hurricane, flooding, fires).

### ***G. VICINITY HIRING***

The locations of the funded projects/activities were determined through the course of the selection process described above. The locations for each planned activity are areas of greatest need. Vicinity hiring requirements will be compiled with and detailed in conjunction with the Section 3 provisions of procurement materials for each project.

***H. PROCEDURES FOR PREFERENCES FOR AFFORDABLE RENTAL DEV.***

Narratives in sections “Summary of Distribution and Uses of NSP Funds” and “How Fund Use Addresses Market Conditions” above detail the procedures for preferences for Adams County’s NSP3 funds. All affordable rental development will be reviewed using Adams County’s NSP application.

***I. GRANTEE CONTACT INFORMATION***

Community Development Manager  
4430 S. Adams County Parkway  
Brighton, CO 80007  
720-523-6200

DRAFT