

Adams County1. CARES Act Amendment, CDBG-CV Projects (July 2020)2. COVID Response, Special Economic Development program (April 2020), prior year resources3. COVID Response, Tenant based rental assistance program (May 2020), prior year resources4. CARES Act Amendment SF-424 and supporting documentation submitted 8/12/20.Thornton: 1. 5/14/20: Revised Thornton CDBG-CV SubmissionWestminster1. CDBG-CV Submission (TBD)

## 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.

**Deleted:** <p style="margin: 0in 0in 0pt; text-align: justify;"><span style="font-size: 11pt;"><font face="Calibri">...

**Deleted:** .</font></span></p><p style="margin: 0in 0in 0pt; text-align: justify;"><span style="font-size: 11pt;"><font face="Calibri"></font></span></p><p style="margin: 0in 0in 0pt; text-align: justify;"><span style="font-size: 11pt;"><font face="Calibri">

**Deleted:** </font></span></p><p style="margin: 0in 0in 0pt; text-align: justify;"><span style="font-size: 11pt;"><font face="Calibri"></font></span></p><p style="margin: 0in 0in 0pt; text-align: justify;"><span style="font-size: 11pt;"><font face="Calibri">

**Deleted:** </font></span></p><p style="margin: 0in 0in 0pt; text-align: justify;"></p><p style="margin: 0in 0in 0pt; text-align: justify;"></p>

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.

[Adams County held a public comment period from June 19, 2019 to July 23, 2019 for the Annual Action Plan. No public comments were received during this time. Furthermore, no public comments were](#)

provided at the July 23, 2019 Public Hearing for the Annual Action Plan. Notice of the public comment period and public hearing were posted in three local papers: the Northglenn-Thornton Sentinel and Brighton Standard Blade. Additionally, notice of the public comment period was posted on the Adams County website.

Adams County held a public comment period from April 15, 2020 to April 20, 2020 for the AAP CARES Act Amendment. No public comments were received during this time. Furthermore, no public comments were provided at the April 21, 2020 Public Hearing for the AAP. Notice of the public comment period and public hearing was posted on the Adams County website in accordance with the Adams County Citizen Participation Plan.

Adams County will hold a public comment period from September 3, 2020 to April 20, 2020 for a substantial amendment to the AAP, with a final opportunity for public comment at the October 6, 2020 Adams County Board of County Commissioners public hearing. Notice of the public comment period and public hearing was posted on the Adams County website in accordance with the Adams County Citizen Participation Plan.

**Deleted:** 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**

No comments were received.

## **7. Summary**

No comments were received.

**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.

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
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**

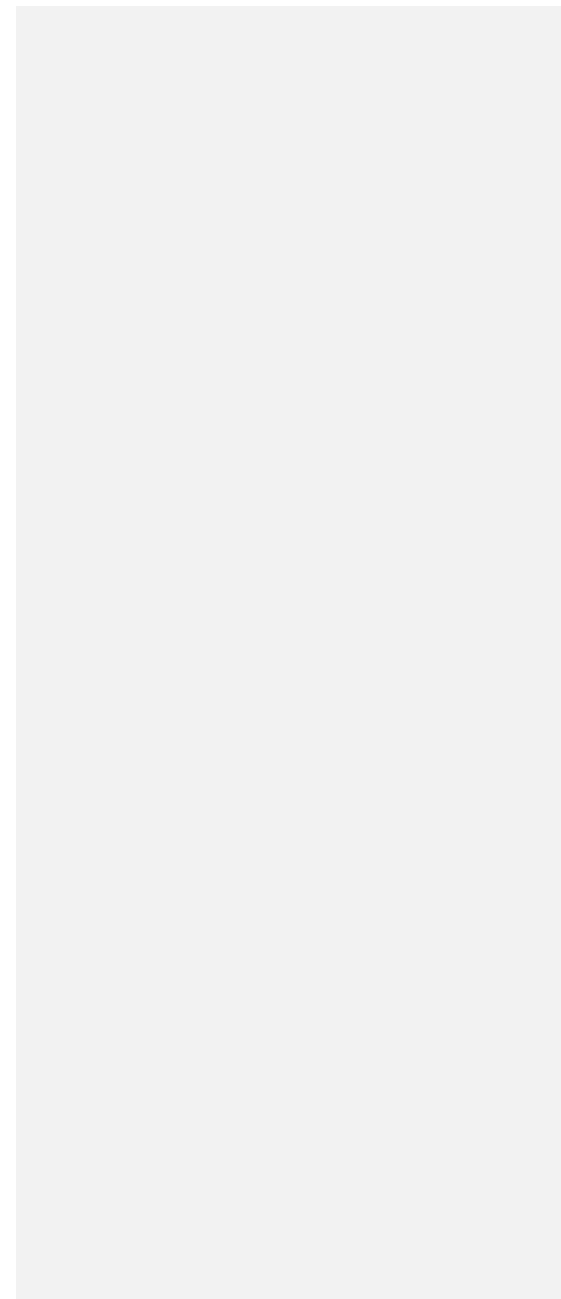
**Melissa Scheere, Community Development Manager, Community and Economic Development Department**

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>
---	--

**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 \$948,000 in Program Income is projected.

HOME Prior Year Resources total \$878,762. Program Income that will be programmed in the 2019 program year is \$316,867 for activities related to HOME approved activities.

#### CDBG-CV Amendment



In the spring of 2020, Adams County was allocated \$830,131 in additional CDBG Coronavirus (CDBG-CV) funding under the Coronavirus Aid, Relief, and Economic Security Act (CARES) Act to address households and businesses throughout the county dealing with economic turbulence from the Coronavirus pandemic.

**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	1,364,927	948,000	0	2,312,927	0	Adams County will allocate 2019 CDBG funds to its Urban County members (four local jurisdictions) for their proposed projects.

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: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	949,905	316,867	878,762	2,145,534	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.
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.

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: \$		
Other	public - federal	Other	830,131	0	0	830,131	0	CDBG-CV funds to prevent, prepare for, and respond to coronavirus (COVID-19).

Table 2 - Expected Resources – Priority Table

Deleted: 1

**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	Construction of New Rental Housing	2015	2019	Affordable Housing	County-Wide City of Westminster	Housing Needs Seniors and other Prioritized Populations	HOME: \$848,635	Rental units constructed: 356 Household Housing Unit
3	Preservation of Existing Housing Stock	2015	2019	Affordable Housing	County-Wide City of Federal Heights City of Brighton <u>City of Northglenn</u>	Housing Needs Community and Economic Development Needs Seniors and other Prioritized Populations	CDBG: <u>\$881,298</u>	Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: <u>40</u> Household Housing Unit Housing Code Enforcement/Foreclosed Property Care: 625 Household Housing Unit
7	Infrastructure Improvements	2015	2019	Non-Housing Community Development	County-Wide City of Northglenn City of Brighton	Community and Economic Development Needs	CDBG: <u>\$586,501</u>	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: <u>7980</u> Persons Assisted

**Deleted:** 657,708

**Deleted:** 22

**Formatted:** Font color: Black

**Deleted:** 820,091

**Deleted:** 13480

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Emergency Housing and Shelter for the Homeless	2015	2020	Homeless	County-Wide	Homelessness	CDBG: \$150,000	Overnight/Emergency Shelter/Transitional Housing Beds added: 48 Beds
9	Increase Job Services and Job Creation	2015	2020	Non-Housing Community Development	County-Wide	Community and Economic Development Needs	CDBG: \$640,000	Jobs created/retained: 40 Jobs

Table 3 – Goals Summary

Deleted: 2

### Goal Descriptions

1	<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>

3	<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 <u>and the City of Northglenn</u>. 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 <u>of Federal Heights</u> has allocated \$23,386 in CDBG for the MHR program. <u>The City of Northglenn has allocated \$223,590 in CDBG for the MHR program.</u></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>
7	<b>Goal Name</b>	Infrastructure Improvements
	<b>Goal Description</b>	<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>

Deleted: ¶

**Deleted:** 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.¶

Deleted: .

Deleted: .

8	<b>Goal Name</b>	Emergency Housing and Shelter for the Homeless
	<b>Goal Description</b>	Adams County will support the “Aurora Emergency Respite Center” at 1101 S. Abilene Street, Aurora, Colorado 80012, for the purpose of housing the homelessness and individuals in vulnerable housing situations for short-term stays in the non-congregant Aurora Emergency Respite Center shelter during the emergency declared by Governor Polis due to the coronavirus COVID-19 outbreak.
9	<b>Goal Name</b>	Increase Job Services and Job Creation
	<b>Goal Description</b>	In response to the COVID-19 pandemic, Adams County is putting together a program to assist for-profit businesses to avoid job loss caused by business closures related to social distancing. Funding can provide short-term working capital assistance to small businesses to enable retention of jobs and provide organizational stability. The program would allow local businesses to apply for a small business grant, up to \$35,000, to retain jobs, following specified criteria.



## 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.

### CDBG-CV Amendment

CDBG-CV funds are to prepare for, prevent, and reponse to the COVID-19 pandemic. The projects outlined below the begin with "CV" are projects funded with CDBG-CV.

#	Project Name
1	CDBG: Housing
2	CDBG: Infrastructure
3	CDBG: Administration
4	CDBG: Economic Development
5	CDBG: Public Service
6	HOME: Adams County
7	HOME: CHDO
8	HOME: Administration
9	HOME: Westminster
10	HOME: TBRA
11	CV-Economic Development
12	CV-Administration
13	CV-Mortgage Assistance

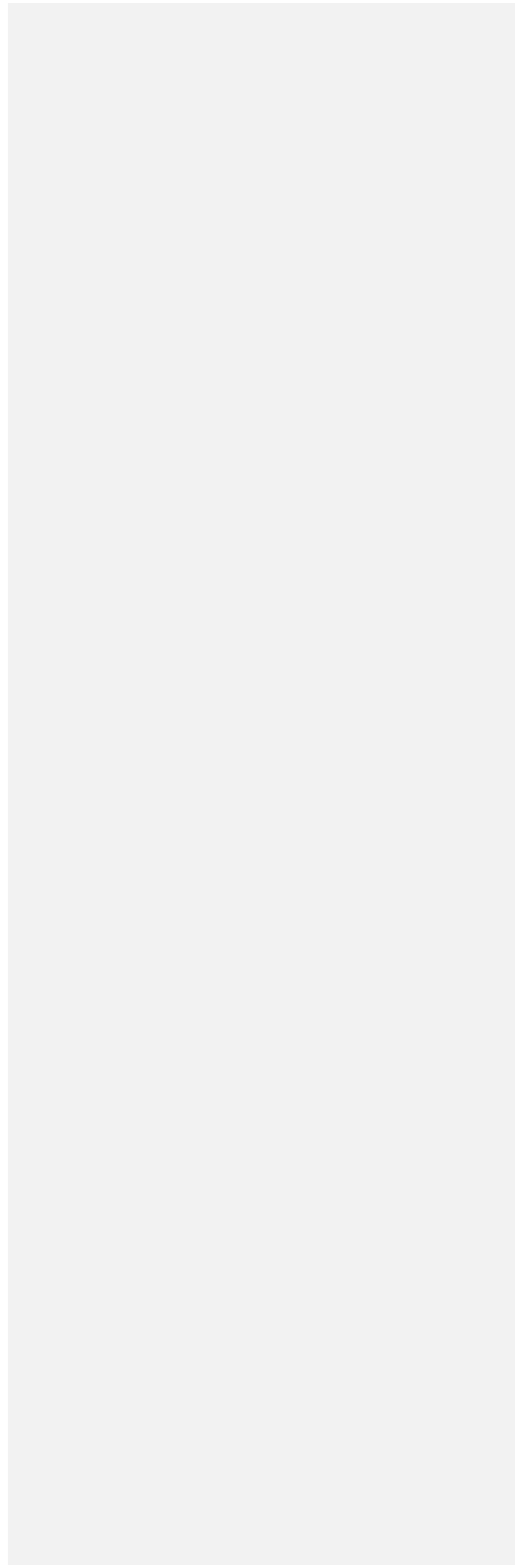
Table 4 – Project Information

Deleted: 3

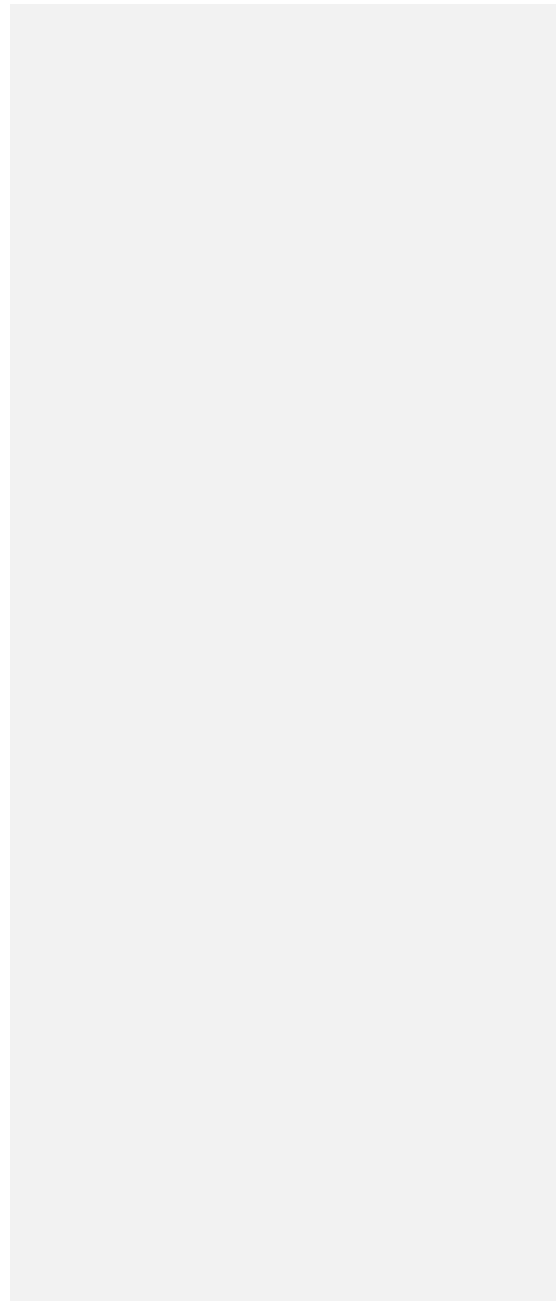
### Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

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 <a href="#">City of Northglenn</a>
	<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: <del>\$789,298</del>
	<b>Description</b>	The Minor Home Repair (MHR) Program will serve low-to-moderate income homeowners throughout the City of Federal Heights <u>and the <a href="#">City of Northglenn</a></u> . 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 <u><a href="#">cities</a></u> . The <u><a href="#">City of Federal Heights</a></u> has allocated \$23,386 in CDBG for the MHR program. <u><a href="#">The City of Northglenn has allocated \$223,590 in CDBG for the MHR program.</a></u> The 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 will be utilized to pay for eligible soft costs.
	<b>Target Date</b>	6/30/2020

Deleted: 565,708

Deleted: City

<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 <u>and approximately 18 low-to-moderate income homeowners throughout the City of Northglenn.</u></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>

Deleted: .

	<b>Planned Activities</b>	<p>The Minor Home Repair (MHR) Program will serve low-to-moderate income homeowners throughout the City of Federal Heights <u>and throughout the City of Northglenn</u>. 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 <u>these cities</u>. <u>The City of Federal Heights has allocated \$23,386 in CDBG for the MHR program.</u> <u>The City of Northglenn has allocated \$223,590 in CDBG for the MHR program.</u> The MHR program meets the matrix code 14A, Rehab: Single-Unit Residential and meets the national objective benefiting low and moderate-income persons.</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. The Rental Housing Inspection Program meets the matrix code 15, Code Enforcement and meets the national objective benefiting low and moderate-income persons (area benefit) and preventing or eliminating slums or blight.</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. The GRID Alternatives project meets the matrix code 14F, Rehab: Energy Efficiency Improvements and meets the national objective benefiting low and moderate-income persons.</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 will be utilized to pay for eligible soft costs. The projects meets the matrix code 03J, Water/Sewer Improvements and meets the national objective benefiting low and moderate-income persons.</p>
<b>2</b>	<b>Project Name</b>	CDBG: Infrastructure
	<b>Target Area</b>	County-Wide City of Northglenn City of Brighton
	<b>Goals Supported</b>	Infrastructure Improvements

Deleted: City

	<b>Needs Addressed</b>	Seniors and other Prioritized Populations Community and Economic Development Needs
	<b>Funding</b>	CDBG: <del>\$596,501</del>
	<b>Description</b>	CDBG funding will be utilized for infrastructure projects in the cities of Brighton and unincorporated Adams County.
	<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 <del>7980</del> 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>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. This projects meets the matrix code 03K, Street Improvements and meets the national objective benefiting low and moderate-income persons (area benefit).</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. This projects meets the matrix code 03K, Street Improvements and meets the national objective benefiting low and moderate-income persons (area benefit).</p>
3	<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

**Deleted:** 820,091

**Deleted:** and Northglenn,

**Deleted:** 13,480

**Deleted:** 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. This projects meets the matrix code 03K, Street Improvements and meets the national objective benefiting low and moderate-income persons (area benefit). ¶

	<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>	CDBG administration costs meet the matrix code 20, Planning. The use of the funds are presumed to meet the national objective benefiting low and moderate-income persons since 100% of Adams County CDBG funds are used to benefit for low-to-moderate income persons or areas.
<b>4</b>	<b>Project Name</b>	CDBG: Economic Development
	<b>Target Area</b>	County-Wide
	<b>Goals Supported</b>	Increase Job Services and Job Creation
	<b>Needs Addressed</b>	Community and Economic Development Needs
	<b>Funding</b>	:
	<b>Description</b>	In response to COVID-19, Adams County is launching a small business stabilization program to fund small businesses that have been impacted by public health orders.
	<b>Target Date</b>	8/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This program will assist a minimum of 40 low to moderate-income individuals (80% AMI or below) by creating & retaining jobs.
	<b>Location Description</b>	County-wide.
	<b>Planned Activities</b>	Grants of up to \$35,000 will be offered to eligible businesses for Special Economic Development to create/retain jobs for 80% AMI and below individuals.
<b>5</b>	<b>Project Name</b>	CDBG: Public Service
	<b>Target Area</b>	County-Wide



	<b>Goals Supported</b>	Emergency Housing and Shelter for the Homeless
	<b>Needs Addressed</b>	Homelessness
	<b>Funding</b>	:
	<b>Description</b>	Adams County will support the Aurora Emergency Respite Center at 1101 S. Abilene Street, Aurora, Colorado 80012, for the purpose of housing the homeless and individuals in vulnerable housing situations for short-term stays in the non-congregant Aurora Emergency Respite Center shelter during the emergency declared by Governor Polis due to the coronavirus COVID-19 outbreak.
	<b>Target Date</b>	7/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will provide 48 beds for homeless individuals and families affected by the COVID-19 pandemic at the Aurora Emergency Respite Center.
	<b>Location Description</b>	1101 S. Abilene Street, Aurora, Colorado 80012
	<b>Planned Activities</b>	Adams County will support the "Aurora Emergency Respite Center" at 1101 S. Abilene Street, Aurora, Colorado 80012, for the purpose of housing the homeless and individuals in vulnerable housing situations for short-term stays in the non-congregant Aurora Emergency Respite Center shelter during the emergency declared by Governor Polis due to the coronavirus COVID-19 outbreak.
6	<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: \$709,557

	<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.
	<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>	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.
<b>7</b>	<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>	HOME: \$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>	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, Community Resources & Housing Development Corporation will be receiving CHDO Operating funds.
<b>8</b>	<b>Project Name</b>	HOME: Administration
	<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>	
9	<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: \$548,635
	<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.
	<b>Project Name</b>	HOME: TBRA

10	<b>Target Area</b>	County-Wide City of Thornton City of Federal Heights City of Northglenn Town of Bennett City of Brighton City of Westminster
	<b>Goals Supported</b>	Preservation of Existing Housing Stock Emergency Housing and Shelter for the Homeless
	<b>Needs Addressed</b>	Housing Needs Seniors and other Prioritized Populations
	<b>Funding</b>	HOME: \$800,000
	<b>Description</b>	Adams County will provide rental housing assistance through its Tenant Based Rental Assistance Program.
	<b>Target Date</b>	6/30/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that over 400 individuals will benefit from this program, approximately 100 households.
	<b>Location Description</b>	Cities of Thornton, Westminster, Northglenn, Federal Heights, Town of Bennett, and unincorporated Adams County.

	<b>Planned Activities</b>	<p>HOME funds will be provided to Maiker Housing Partners and Brighton Housing Authority to operate the program. The program provides rental assistance to tenants if the household is 60% area median income (AMI) or less, and the landlord agrees to the program parameters. The program will serve rental units located in unincorporated Adams County, Town of Bennett, and the cities of Northglenn, Brighton, Federal Heights, Thornton, and Westminster.</p> <p>The program will be structured to set-aside \$300,000 to individuals and/or families currently in need of housing, \$500,000 for individuals and/or families currently renting, and \$65,000 for Maiker Housing Partners and Brighton Housing Authority staff administration costs from HOME administration. Brighton Housing Authority will administer the portion of the program for individuals and/or families in need of housing. Maiker Housing Partners will administer the portion of program for individuals and/or families currently in housing. The administration costs will be proportionately shared to Brighton Housing Authority and Maiker Housing Partners.</p>
11	<b>Project Name</b>	CV-Economic Development
	<b>Target Area</b>	County-Wide City of Federal Heights City of Northglenn Town of Bennett City of Brighton
	<b>Goals Supported</b>	Increase Job Services and Job Creation
	<b>Needs Addressed</b>	Community and Economic Development Needs
	<b>Funding</b>	CDBG-CV: \$360,000
	<b>Description</b>	Supplemental funding to the COVID-19 response Small Business Stabilization Program that provides grant to local businesses affected by public health orders related to COVID-19.
	<b>Target Date</b>	12/31/2020
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The supplemental funding to the COVID response Small Business Stabilization Program will serve a minimum of ten (10) businesses.
	<b>Location Description</b>	Urban County areas: Northglenn, Federal Heights, Brighton, Bennett, and unincorporated Adams County.

**Deleted:** <p style="color: #000000; text-transform: none; text-indent: 0px; letter-spacing: normal; font-family: 'Times New Roman'; font-size: medium; font-style: normal; font-weight: 400; word-spacing: 0px; white-space: normal; orphans: 2; widows: 2; font-variant-ligatures: normal; font-variant-caps: normal; -webkit-text-stroke-width: 0px; text-decoration-style: initial; text-decoration-color: initial;">

**Deleted:** </p><p style="color: #000000; text-transform: none; text-indent: 0px; letter-spacing: normal; font-family: 'Times New Roman'; font-size: medium; font-style: normal; font-weight: 400; word-spacing: 0px; white-space: normal; orphans: 2; widows: 2; font-variant-ligatures: normal; font-variant-caps: normal; -webkit-text-stroke-width: 0px; text-decoration-style: initial; text-decoration-color: initial;">

**Deleted:** </p>

	<b>Planned Activities</b>	Grants of up to \$35,000 will be offered to eligible businesses for Special Economic Development to create/retain jobs for 80% AMI and below individuals.
<b>12</b>	<b>Project Name</b>	CV-Administration
	<b>Target Area</b>	County-Wide City of Federal Heights City of Northglenn Town of Bennett City of Brighton
	<b>Goals Supported</b>	
	<b>Needs Addressed</b>	Community and Economic Development Needs
	<b>Funding</b>	CDBG-CV: \$166,026
	<b>Description</b>	20% of the allowable administration costs will be utilized to conduct an Infectious Disease Impact Study on Adams County's low-to-moderate income neighborhoods.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	Urban County areas: Northglenn, Brighton, Federal Heights, Bennett, and unincorporated Adams County.
	<b>Planned Activities</b>	In lieu of using the allowable 20% of administration costs, an infection disease impact study would focus on the impacts of COVID-19 to low-to-moderate income neighborhoods/areas in the Adams County Urban County areas. The study would assist with strategizing how future CDBG funding could focus on COVID-19 recovery.
<b>13</b>	<b>Project Name</b>	CV-Mortgage Assistance
	<b>Target Area</b>	County-Wide City of Federal Heights City of Northglenn Town of Bennett City of Brighton
	<b>Goals Supported</b>	Preservation of Existing Housing Stock
	<b>Needs Addressed</b>	Housing Needs

<b>Funding</b>	CDBG-CV: \$304,105
<b>Description</b>	Offer interim mortgage assistance for households affected by the COVID-19 pandemic.
<b>Target Date</b>	12/31/2020
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated approximately 60 households will benefit from the proposed activities.
<b>Location Description</b>	Urban County areas: Northglenn, Brighton, Federal Heights, Bennett, and unincorporated Adams County
<b>Planned Activities</b>	<p>Provide Community Resources &amp; Housing Development Corp. (CRHDC) with funding to operate a short-term mortgage assistance program. Program would allow for up to 3 months of mortgage assistance. Funding would be broken out as follows:</p> <ul style="list-style-type: none"> <li>• 0-80% AMI households: \$221,092</li> <li>• 81-120% AMI households (urgent need National Objective): \$83,013</li> </ul>



## 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

Target Area	Percentage of Funds
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.

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

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

Deleted: 5

One Year Goals for the Number of Households Supported Through	
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

#### Discussion

## **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.

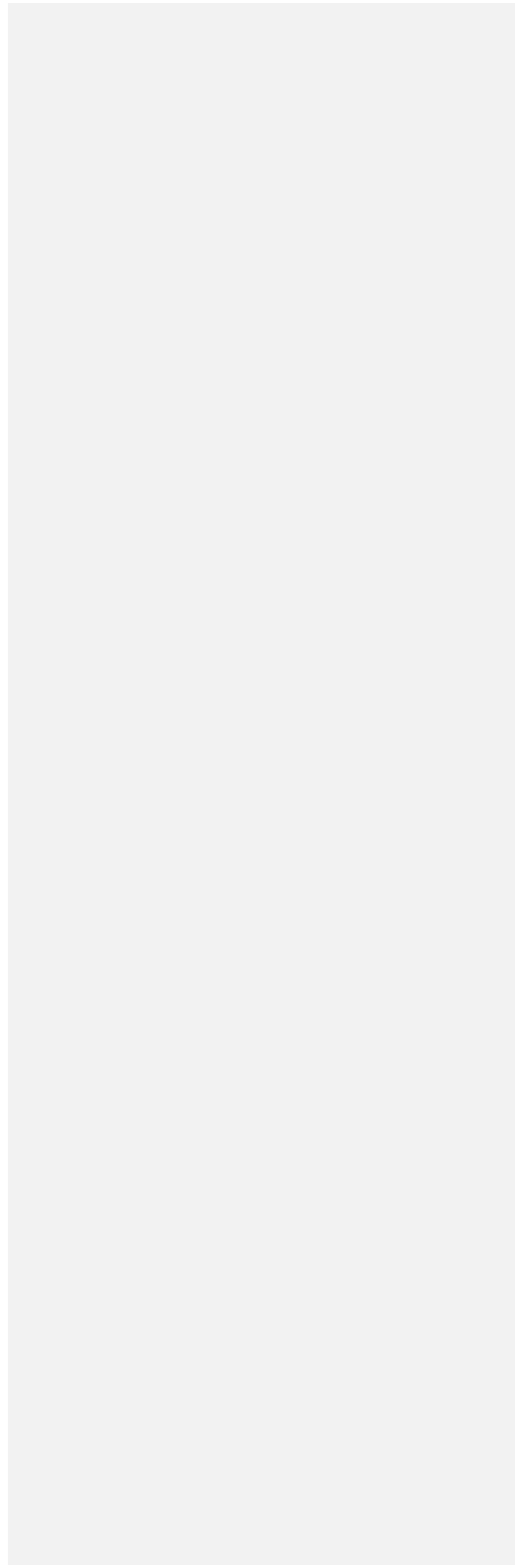
**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth 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

Annual Action Plan  
2019

48



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 adn 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.

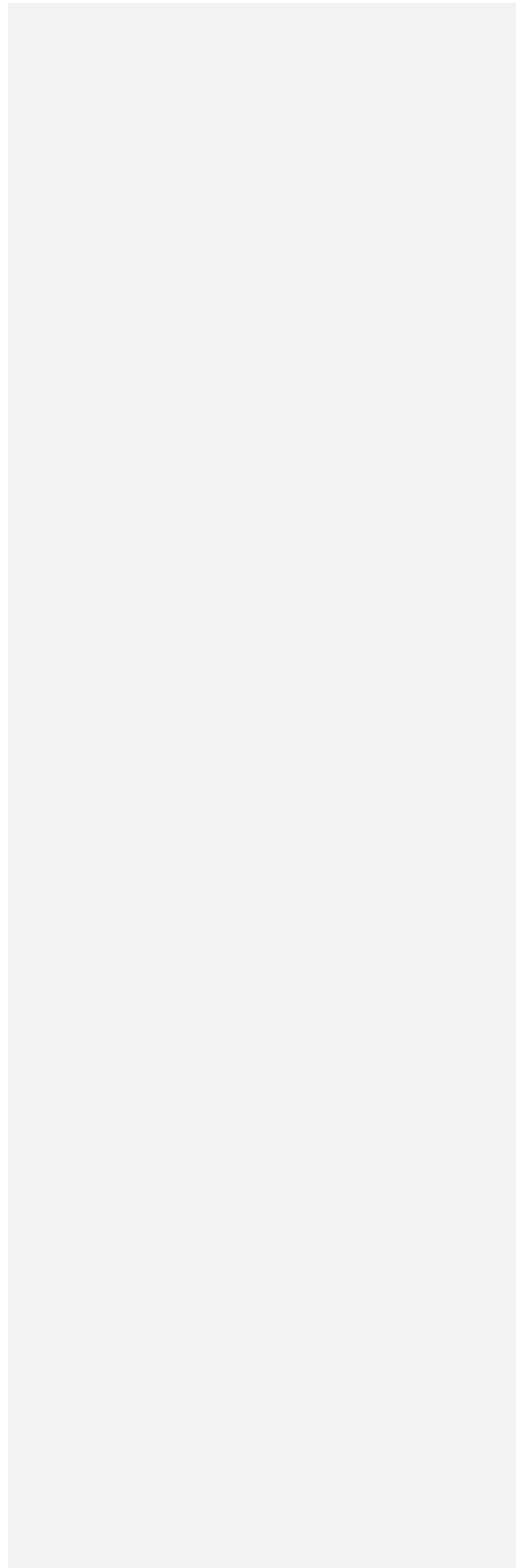
### **Actions planned to enhance coordination between public and private housing and social service agencies**

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 recaptured amount is not based on net-proceeds of the sale of the home, it is based solely on the amount that has not been forgiven. 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. The recaptured amount is not based on net-proceeds of the sale of the home, it is based solely on the amount that has not been forgiven.

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

