



PY 2024 Consolidated Annual Performance and Evaluation Report (CAPER)

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

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

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

The City of Westminster is an entitlement jurisdiction that receives an annual allocation of Community Development Block Grant (CDBG) program funds through the U.S. Department of Housing and Urban Development (HUD). These funds help the City address the housing and community development objectives outlined by HUD, which include, but are not limited to: affordable housing preservation, public improvements, and vital public services for special needs and low- to moderate-income (LMI) populations. Program Year (PY) 2024, which ran from October 1, 2024 to September 30, 2025, is the fifth and final year of the City's 2020-2024 Consolidated Plan (ConPlan). The upcoming year will start a new five-year program cycle. The accomplishments for PY 2024 are summarized below:

Affordable Housing: The City assisted a total of 308 LMI households through its housing rehab programs. Of this total, there were 26 LMI homeowner households assisted through the Emergency and Essential Home Repair Program's (EEHR) Foothills Regional Housing activities (#1263 & #1276) and Brothers Redevelopment activities (#1269 & #1275). Also, included in the total assisted were 282 LMI rental households assisted through the Housing Lift program's Redwood Village Foothills Regional Housing activity (#1271 and the Village at Greenbriar activity #1272).

Public Facilities and Infrastructure Improvements: The City continued to make improvements to the 73rd and Lowell Community Event Space (#1258), which had a low/mod areawide benefit to 7,625 persons. Improvements were completed, included updating underground infrastructure needs for the site, helping to ensure this project meets the needs of the site and benefitting those living in the neighborhood.

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

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

Goal	Category	Source	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration	Administration	CDBG	Other	Other	1	1	100.00%	1	1	100.00%
Fair Housing Action Plan	Affordable Housing	CDBG	Other	Other	0	0	0.00%			
Homeless Resident Support	Homeless	CDBG	Housing for Homeless added	Household Housing Unit	1	38	3,800.00%			
Infrastructure and Streetscape Improvements	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	400	400	100.00%			
LMA Benefitting Community Event Space	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	200	15250	7,625.00%	5000	7625	152.50%
Preserve and Expand Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG	Rental units constructed	Household Housing Unit	200	0	0.00%			

Preserve and Expand Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG	Rental units rehabilitated	Household Housing Unit	25	388	1,552.00%	100	282	282.00%
Preserve and Expand Affordable Housing	Affordable Housing Non-Homeless Special Needs	CDBG	Homeowner Housing Rehabilitated	Household Housing Unit	25	101	404.00%	20	26	130.00%

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

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

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

PY 2024, CDBG funds focused on affordable housing rehab and public facility improvements. Affordable housing rehab activities included essential and minor rehab of existing affordable housing of both rental and homeowner housing. Public facility activities included the continued improvements at the 73rd and Lowell Community Event Space activity. These improvements included updating underground needs for the site, helping to ensure this project meets the needs of the site and benefiting those living in the neighborhood. The following is a distribution of CDBG funds by priority in PY 2024:

- Affordable Housing (EEHR & Housing LIFT): \$1,206,534.06 (74.9%)
- Public Facilities (73rd and Lowell Community Event Space): \$220,021.25 (13.7%)
- Administration of the CDBG Program: \$183,575.49 (11.4%)
- Total CDBG expenditures in PY 2024: \$1,610,130.80

PY 2024 Goals and Actual Accomplishments Comparison

Administration: The City provided effective program management of the CDBG program in PY 2024, which included maintaining program compliance, affirmatively furthering fair housing, and planning of the program.

Preserve and Expand Affordable Housing: The City had a goal to assist 100 households with renter housing rehab through the Housing LIFT program, and 20 households with homeowner housing rehab through the EEHR program activities. The City met its goals with 282 LMI renter households assisted through the Housing LIFT program and 26 LMI homeowner households assisted through the EEHR program.

LMA Benefitting Community Event Space: The City had a goal to assist 5,000 persons living in low/mod areas with this goal and met this goal with the continued improvements at the 73rd and Lowell Community Event Space activity (#1258). Using HUD's Low/Mod Summary Data to calculate benefits, this activity had a low/mod areawide benefit to 7,625 persons.

CR-10 - Racial and Ethnic composition of families assisted

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

	CDBG
White	308
Black or African American	0
Asian	0
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	308
Hispanic	4
Not Hispanic	304

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

Narrative

DATA NOTE: The data presented above is derived from the beneficiary accomplishments reported in the PY 2024 PR23 Summary of Accomplishments and the PR03 CDBG Activity Summary Report. It is important to note that the table does not include a category for individuals who identify as “other” or “multiple races.” Additionally, it does not account for beneficiaries of projects that provide an “area benefit” to the community, such as public facility improvement activities in low- to moderate-income areas. As a result, the figures in the table do not fully represent the total number of individuals served by the CDBG program.

According to the most recent 2019-2023 American Community Survey (ACS) 5-Year Estimates, the population in Westminster was 115,546 persons. White persons account for 74.7% of the total population. An estimated 4.7% were Asian, 1.2% were Black, 0.8% were American Indian and Alaskan Natives, 4.5% were “Other” and 14.0% were “Two or more” races. All other races were less than 1%. Individuals that identified as ethnically Hispanic (of any race) account for 23.7% of the citywide population. Below is an assessment of services for minority groups by program.

All of the households assisted in PY 2024 reported as White. Of the total reporting ethnicity 1.3% were Hispanic. There is a need to address the needs of minority groups in the City.

Housing Needs Assessment

As a member of the HOME Consortium, the City did not conduct a full housing needs assessment for its Consolidated Plan. However, it identified housing preservation as a priority within the plan. In PY 2024, the City assisted 308 households with housing rehabilitation activities. All households receiving assistance in PY 2024 identified as White, and only 1.3% reported Hispanic ethnicity. Due to the small number of minority households in Westminster, not all smaller minority groups can receive assistance.

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,138,209	1,610,130

Table 3 - Resources Made Available

Narrative

The table above shows the resources made available for PY 2024 and amounts expended in the CDBG programs. In PY 2024, the City had a total of \$1,138,209 in CDBG funds, made available from the annual allocation with \$562,333 and reprogrammed prior year funds with \$575,876. The City expended \$1,610,130.80 in CDBG funds (including funds carried over from previous years) on housing rehab activities, public facility improvements, and administration of the program. Details of the uses of funds are listed below:

Affordable Housing (EEHR & Housing LIFT): \$1,206,534.06 (74.9%)
Public Facilities (73rd and Lowell Community Event Space): \$220,021.25 (13.7%)
Administration of the CDBG Program: \$183,575.49 (11.4%)
Total CDBG expenditures in PY 2024: \$1,610,130.80

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

CDBG-CV Funds

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

FY CDBG Grant Allocation Close-Out

At the end of each program year, the City reviews the spending status of FY grant allocations for the CDBG program. None of the FY grant allocations were fully spent in the program year. When a FY grant allocation has been spent in full, the City will contact its HUD office to initiate the close-out process as outlined in CPD-22-14.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
City-Wide	100	100	Housing rehab by eligibility, public facility improvements in low/mod area

Table 4 – Identify the geographic distribution and location of investments

Narrative

In PY 2024, 20% of the CDBG funding was budgeted for administration, and the balance of funds was applied to public facility improvements in low/mod areas and housing rehab activities citywide to eligible LMI households.

For the purpose of identifying activities for public facilities or infrastructure improvements, the City uses low- and moderate- income census block group tract areas as identified by HUD’s CDBG Low Mod Income Summary Data (LMISD). In PY 2024, the City completed improvements to public facilities that had a low/mod areawide benefit to 7,625 persons. These improvements were associated with the 73rd and Lowell Community Event Space activity. HUD CDBG LMISD data can be found at <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

Leveraging

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

The City of Westminster provides approximately \$500,000 through the Housing LIFT program. The grantee is required to provide the additional leveraging to complete the project. Our EEHR partners offer supplementary funds to complete projects based on need.

The City of Westminster's CDBG allocation complements several additional resources employed to support the goal areas identified. The primary resources are: 1) the City's Capital Improvement Program, which is used for major capital projects; 2) HOME funds, allocated through the Adams County HOME Consortium; and 3) a limited amount of departmental operating funds from the City General Fund that may be utilized for certain contract services. In addition, the City utilizes Private Activity Bond (PAB) capacity, which provides roughly \$6 million per year for housing activities. The City has assigned its PAB to support applications by affordable housing developers for both 4% and 9% Low Income Housing Tax Credits (LIHTC) by contributing through tax and fee rebates. These are negotiated based on specific project needs and administered through Development Assistance Agreements. In years when there are not affordable housing projects in development within Westminster boundaries, the City assigns its PAB to the Colorado Housing and Finance Authority (CHFA) for administration.

Publicly owned property located within the jurisdiction that was used to address the needs identified in the plan

Land Donation for Affordable Housing

The City has contributed its own land for private development to support affordable housing initiatives. This contribution is not automatic; rather, it is an additional form of financial assistance that is provided only after a thorough review of the project's financial details to identify any financial gaps. Furthermore, it must be clearly demonstrated that the project serves a public purpose, which is a requirement as outlined in the City's charter and municipal code. For developments that meet the City's housing needs, land may be sold for the nominal price of \$1 (for tax recording purposes). The City has a limited number of parcels that can be designated for these types of projects if they come forward.

Infrastructure and Streetscape Improvements in Public Right-of-Way

During the 2020-2024 Consolidated Planning period, several programmed infrastructure activities were utilizing publicly owned land. The City has made pedestrian safety and sidewalk improvements on approximately a two-block length of a local street in the Westminster Station TOD neighborhood, where a majority of the current multi-family residences are owned and operated by Maiker Housing Partners.

The City continued to make improvements to public facilities in low/mod areas such as the 73rd and Lowell Community Event Space activity (#1258). Improvements included updating underground infrastructure needs for the site, helping to ensure this project meets the needs of the site and benefiting those living in the neighborhood.

CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	0	0
Number of Non-Homeless households to be provided affordable housing units	120	308
Number of Special-Needs households to be provided affordable housing units	0	0
Total	120	308

Table 5 – Number of Households

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	0
Number of households supported through The Production of New Units	0	0
Number of households supported through Rehab of Existing Units	120	308
Number of households supported through Acquisition of Existing Units	0	0
Total	120	308

Table 6 – Number of Households Supported

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

Table 1 (Number of Households): For the first table, the City had a goal to assist 120 non-homeless households with affordable housing units. Non-homeless households are served through the Emergency and Essential Home Repair (EEHR) program for homeowner households and the Housing LIFT program for renter households. These two CDBG housing rehab programs assisted a total 308 LMI households.

Reporting by program, there were 26 LMI homeowner households assisted through the Emergency and Essential Home Repair Program's (EEHR) Foothills Regional Housing activities (#1263 & #1276) and Brothers Redevelopment activities (#1269 & #1275). There were 282 LMI rental households assisted through the Housing Lift program's Redwood Village Foothills Regional Housing activity (#1271) and the Village at Greenbriar activity (#1272).

Table 2 (Number of Households Supported): For the second table, there was a goal to assist 120 households with housing rehab activities. As noted above there were 308 LMI households assisted through the housing rehab programs. The following is a breakdown of accomplishments by activity.

Homeowner Housing Rehab: 26 owner-occupied households assisted

1263 - Emergency and Essential Home Repair Program - Foothills Regional Housing (9) LMH

1269 - Emergency and Essential Home Repair Program - 2021 Brothers Redevelopment, Inc (7) LMH

1275 - Emergency and Essential Home Repair Program - 2024 Brothers Redevelopment, Inc (6) LMH

1276 - Emergency and Essential Home Repair Program - 2024 Foothills Regional Housing (4) LMH

Rental Housing Rehab: 282 renter-occupied households assisted

1271 - Housing Lift - Redwood Village Foothills Regional Housing (50) LMH

1272 - Housing Lift - Village at Greenbriar (232) LMH

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

Discuss how these outcomes will impact future annual action plans.

The preservation of affordable housing is a top priority for the City of Westminster. The City's current and previous CDBG-funded projects have addressed community needs, including the aging housing stock and infrastructure. The activities and projects outlined in the 2024 Annual Action Plan, along with the goals for the five-year planning period, aim to maximize the efficient and effective use of CDBG funds. Additionally, these initiatives will invest in neighborhood improvements by preserving and expanding the supply of affordable housing.

The history of the City's CDBG program and its past investments, combined with feedback gathered through the citizen participation process, informed the development of the goals and objectives for the 2020-2024 Consolidated Plan. These goals and objectives are broad enough to encompass a wide range of projects and activities. Since eligible housing activities under the CDBG program are limited to housing rehabilitation and acquisition, along with other uses in special circumstances, the City's housing goals will continue to focus on housing preservation with CDBG funding.

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

Number of Households Served	CDBG Actual
Extremely Low-income	289
Low-income	18
Moderate-income	1
Total	308

Table 7 – Number of Households Served

Narrative Information

During PY 2024 the Emergency and Essential Home Repair Program (EEHR) served 26 households. Of this total 7 of the households served qualified as extremely low-income, 18 qualified as low-income, and 1 were moderate-income.

The Housing LIFT program served 282 households. All of the households served qualified as extremely low-income.

The EEHR program is a flagship housing assistance initiative that has been supporting Westminster residents since 2010. City leaders often hear from residents who have benefited from EEHR grants, expressing that this investment has significantly improved their home safety and enabled them to make necessary repairs they could not have afforded otherwise. The program collaborates with two subrecipients: Brothers Redevelopment, Inc. (BRI), which assists City residents in Adams County, and the Foothills Regional Housing handyman program, which serves City residents in Jefferson County.

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

The Housing LIFT program offers targeted grants to eligible affordable housing properties for capital improvements that enhance public health, safety, and welfare. Its goal is to preserve affordable multi-family properties and protect residents. Officially launched in early 2023, the City collaborated with Brothers Redevelopment and Maiker Housing Partners to renovate two existing multifamily rental properties.

Worse Case Needs

Those with worst case needs are persons or households at-risk of or experiencing homelessness and are households with extremely low-income. The City will work to target extremely low-income households

with its housing programs. The City's housing rehab activities assisted 101 extremely low-income households.

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

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

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

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

The City employs full-time staff dedicated to addressing the needs of low-income community members, including those experiencing homelessness. In 2020, the City hired a full-time Homeless Navigator to provide direct outreach to unsheltered individuals and families. That same year, a second full-time Navigator was brought on board to better address the needs of people experiencing homelessness. In 2025, the City addition two additional homeless navigator positions, bringing the team to four navigators.. During calendar year 2025, the navigators:

- i. Permanently housed 18 people;
- ii. Placed 15 people in temporary residential programs;
- iii. Provided more than 2,609+ hotel rooms for shelter, medical respite or bridge housing,
- iv. Provided 1,950 specific services to 133 clients over the course of the year to help them access more supports, benefits and/or housing;
- v. Coordinated 18 Resource Fairs where 608 people connected directly to up to 7 service providers.
- vi. Hosted 4 Department of Motor Vehicle events where 263 people obtained identification documents to be able to obtain other resources.

In 2025, the City of Westminster Homeless Navigators served 150 clients in 125 households total.

Since 2020, the Westminster Navigator Program 135 permanently housed 135, placing another 51 into temporary housing. As navigator positions were added, the staff began to track additional measures. Since 2023, the City has paid for 8,849+ hotel rooms, many of the rooms for more than one person and provided 5,629 services to better connect people experiencing homelessness to resources.

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

The City supports local non-profit service providers in their applications for Emergency Solutions Grants (ESG) and collaborates closely with these providers to coordinate services for residents. The City has partnered with local non-profits and public housing organizations to connect individuals in need with emergency rental assistance and Emergency Housing Vouchers (EHV) to help prevent or resolve homelessness on a case-by-case basis.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City offers hotel accommodations for individuals experiencing homelessness and collaborates with various service providers to connect families and individuals to available transitional housing options. The City's Homeless Navigators have access to resources that provide severe weather shelter for those found outdoors on nights with extreme conditions. Severe weather is defined as nights when temperatures drop below freezing and/or when there is precipitation in freezing temperatures.

With the assistance of the City's homeless support staff, partnerships have been established with seven local motels to offer rooms for unhoused residents during severe weather. Additionally, the City refers people experiencing homelessness to Adams County's emergency weather shelters in hotels and to the Jefferson County Cold Weather Hotel Shelters, which offers non-congregate shelter options, as part of regional collaborations.

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

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

The City Navigators use the Homeless Management Information Software (HMIS) provided by the Continuum of Care (CoC) to better serve individuals experiencing homelessness. The Navigator position and program are funded solely through local tax dollars, meaning they are not mandated by HUD. However, the City chooses to implement this program to ensure that service referrals are as seamless and effective as possible for those facing homelessness. When necessary, the navigators also enter clients into the Coordinated Entry Community Queue and/or advocate for them through Alternate Process.

The Homeless Navigator receives referrals from probation officers in the municipal court for individuals who are released from jail or prison while experiencing homelessness. Additionally, the Navigator increasingly collaborates with social workers in hospitals to assist patients being discharged who are also facing homelessness. The Navigator seeks out hotel rooms or diversion strategies to ensure that no one is released into literal homelessness, especially if they are medically fragile. Furthermore, the Navigator works closely with the Police Department's Mental Health Co-Responders to identify the best placement options for individuals experiencing homelessness who require behavioral health support.

When temperatures are predicted to have 0-degrees Fahrenheit windchill forecast for six or more hours, the City does hire a non-profit contractor to operate a congregate shelter facility at one of the City's recreation centers. The City continues to identify and work with regional partners to provide transitional housing for homeless families. The Homeless Navigator staff has provided increased visibility and efficacy

in the City's effort to assist individuals and families in need of housing. As of October 1, 2025, the City financially contributes to the Jefferson County Cold Weather Sheltering system.

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

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

In the Denver Metro Area, most services designed to assist individuals who are homeless and living with HIV/AIDS are provided through the State of Colorado and non-profit organizations, primarily located in central Denver. Although there are a limited number of non-profits serving the Westminster community, their shelter facilities are not situated within the city's boundaries. These organizations offer support to persons experiencing homelessness or those at risk of becoming homeless by providing services such as food, clothing, rent and utility assistance, as well as a small number of emergency shelter beds.

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

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

Actions taken to address the needs of public housing

The City is served by two public housing authorities (PHAs): Maiker Housing Partners (formerly known as the Adams County Housing Authority) and Foothills Regional Housing (previously the Jefferson County Housing Authority). Neither of these partner PHAs owns traditional federal public housing. Instead, all properties managed by these two PHAs have either been converted through Section 18 disposition or developed with a combination of federal and state tax credits, loans, and grant programs. The City actively collaborates with the development teams of each PHA to support financing applications and provide additional resources for preservation, construction, and development needs. The 2020-2024 CDBG Consolidated Plan formalized programs that will allocate CDBG funding for developing affordable housing site improvements and preserving affordable multi-family housing.

The preservation of affordable multi-family housing program continued through the Housing LIFT program during PY 2024 with two multi-family property applicants. One of these was the Redwood Village Foothills Regional Housing rehab activity (#1271) which served 50 LMI residents and rehab at the Village at Greenbriar development (#1272) which served 232 LMI residents.

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

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

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

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

Maiker Staffing includes three full-time Community Navigators and three Resource Navigators who assist residents across multiple properties. They also support a Community Council made up of ambassadors from each managed property. The Navigators enhance communication and information-sharing among residents and connect them to other community resources. Orchard Crossing, a project-based Section 8

property with 70 apartments, has been served by a Resource Navigator since 2020. This staff member went door-to-door during the pandemic to help residents apply for housing and food assistance programs.

Also, in PY 2024, the community navigators continued to branch out of the PHA properties to work with residents throughout Historic Westminster. Growing Home, an area non-profit providing services and resources to strengthen LMI families, provided additional staff support to increase access for navigators to meet and network while assisting local families in need of added services. The City participated in two community forums to provide the navigators with information to help residents with landlord-tenant and rental assistance questions.

Historic service providers in Westminster, along with residents, have been actively working to address regional food security, especially following the closure of local grocery stores during the pandemic. Growing Home operates the largest food pantry in Westminster and has played a crucial role in providing food security and advocating for housing assistance for residents over the past two years. Additionally, Maiker Housing Partners collaborates with a mobile grocery service (grocery truck) to serve the local community.

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

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

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

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

Actions taken to provide assistance to troubled PHAs

N/A. The City does not have any troubled PHAs.

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

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

The City's 2040 Comprehensive Plan was adopted in April 2023. In conjunction with this update, staff is working to revise and enhance development codes and standards. The City is focused on maintaining a balance between neighborhood character, land use, and the cost of housing development throughout this process. The 2040 Comprehensive Plan and the related code updates will create opportunities for specific focus areas and neighborhoods to explore alternative housing options, such as accessory dwelling units and duplexes, as well as to increase density.

Additionally, the City has committed to the State of Colorado to access the newly established Proposition 123 (Prop 123) affordable housing fund. Starting in 2024, the State estimates that Prop 123 will generate approximately \$350 million to help meet its affordable housing needs. As part of this commitment, the City must approve building permits for the development of at least 288 new affordable housing units by December 2026. This initiative allows developers within the City to apply for access to the state housing funds.

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

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

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

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

The City is involved in various regional initiatives focused on collaboratively identifying and addressing the challenges faced by residents who are struggling to secure housing. Additionally, the City works with these residents to provide temporary support for emergency needs. City staff participate in the Jefferson County Homeless Navigator Services program and lead annual community outreach efforts to conduct the Point-in-Time (PIT) homeless census. This outreach helps gather data and develop strategies to effectively allocate resources to support this important work.

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

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

The City directly addresses lead-based paint (LBP) hazards and increases access to housing without LBP hazards through its EEHR program. For the City's home rehabilitation program, administered jointly by Foothills Regional Housing and Brothers, projects are generally limited to \$10,000 in hard costs. All projects that are not exempted from HUD's LBP regulations must meet HUD's under \$10,000 threshold requirements, which are as follows:

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

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

In special circumstances, emergency repairs involving safety may be allowed at slightly higher costs than the standard \$10,000 maximum per property. In these cases, City subrecipients Foothills Regional Housing and Brothers must comply with HUD regulations governing rehabilitation work with costs between \$10,000 and \$25,000. This level of expenditure triggers all six steps noted above, along with the additional requirements to perform a risk assessment and interim controls, as described in 24 CFR §35 Subpart J.

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

The City is actively collaborating with the Adams 12 and Westminster Public Schools districts to connect families with opportunities for both youth and parent engagement programs.

Since 2016, the Parks, Recreation, and Library (PRL) staff have been working with a parent council in Historic Westminster to implement a parks planning process. This ongoing connection with the primarily Spanish-speaking parent council has enhanced access to community resources and opportunities. The initial work group has now expanded to include a larger network of Spanish-speaking households who participate in various city and local nonprofit planning processes. This year, the community navigator

network focused on providing training and information updates to assist low- and moderate-income residents.

Additionally, the Parks, Recreation, and Libraries (PRL) staff have expanded the recreation scholarship program, allowing an unlimited number of applicants to receive discounts of up to 90% on any offered recreation program. They have also removed barriers to accessing the scholarships by eliminating the requirement to provide proof of need.

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

The Economic Development Division continues to strive to effectively implement the CDBG programs and activities as well as support the development of affordable housing in the City.

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

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

The City is committed to providing educational information about affordable housing initiatives and how CDBG funding is applied to address housing and revitalization needs. Staff actively participates in internal planning and development discussions regarding local housing needs and initiatives, while also educating colleagues about regional activities that impact the City's housing inventory and costs. By gathering this information and sharing the narrative of housing needs alongside what is available in our local market, we have made the City's affordable housing challenges more transparent.

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

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

The Resiliency Division of the City's Economic Development Department manages the City's CDBG program and collaborates with both private and public affordable housing developers. In this role, City staff work with developers who are seeking assistance with Low-Income Housing Tax Credit (LIHTC) applications or other state and regional funding sources. Furthermore, in certain cases, the City may provide direct financial support to address identified funding gaps and enhance the financial viability of affordable housing projects.

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

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

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

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

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

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

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

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

Actions Taken

In PY 2024, the City of Westminster worked to address the following impediments identified in the AI:

Lack of resources to address poor housing conditions: The City assisted 308 LMI households with the preservation of existing housing stock through the Emergency and Essential Home Repair Program for homeowners and the Housing LIFT program for renters.

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

also help to invite outside resources and private investments into low/mod areas.

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

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

CR-40 - Monitoring 91.220 and 91.230

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

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

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

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

Comprehensive Planning Requirements

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

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

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

Citizen Participation for the PY 2024 AAP

The City of Westminster adheres closely to its HUD approved Citizen Participation Plan (CPP) which under 24 CFR 91.105 encourages citizens to participate in the development of the Consolidated Plan and each subsequent AAP. The CPP especially encourages participation from LMI residents and special need communities. The citizen participation requirements for the PY 2024 AAP included a 30-day community review and comment period for the proposed AAP held from June 13, 2024 to July 13, 2024; a public hearing to discuss the plan with the public held on May 29, 2024; and a public hearing with the Westminster City Council to approve the plan held on July 22, 2024. The City's community service partners supported additional communications and outreach via client email and newsletters. Comments were made at the first public hearing with comments focused on the two housing programs and the housing and community development needs of the City. A full summary has been provided with the 2024 AAP submission.

Executive Order Compliance

The City of Westminster agrees that its compliance in all respects with all applicable Federal anti-discrimination laws is material to the U.S. Government payment decisions for purposes of section 3729(b)(4) of title 31, United States Code. The City will not operate any programs that violate any applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964.

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

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

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

PUBLIC COMMENT PERIOD: All interested citizens are encouraged to participate. The draft CAPER will be available to the public to review from October 23, 2025, to November 10, 2025, and can be found on the City of Westminster website at: <https://www.westminsterco.gov/804/Community-Development-Block-Grant-CDBG>

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

PUBLIC HEARING: A public hearing will be held at a regularly scheduled City Council meeting on November 10, 2025, at 7:00 PM. City Council meetings are held at City Hall in Council Chambers located at 4800 West 92nd Avenue in Westminster, Colorado.

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

CR-45 - CDBG 91.520(c)

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

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

CDBG-CV

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

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

No

CR-58 - Section 3

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

Total Labor Hours	CDBG
Total Number of Activities	2
Total Labor Hours	0
Total Section 3 Worker Hours	0
Total Targeted Section 3 Worker Hours	0

Table 8 – Total Labor Hours

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

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

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

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

Section 3 Projects cover housing rehab/construction and public improvement construction activities assisted under HUD grant programs that provide housing and community development financial assistance which exceed a threshold of \$200,000. A \$100,000 project threshold applies to grants under HUD's Lead Hazard Control and Healthy Homes programs. In PY 2024, there were two new activities that met the threshold as defined as a Section 3 project.

Activity #1271 Housing Lift - Redwood Village Foothills Regional Housing has been funded for \$735,000 and meets the reporting threshold. This activity includes the complete removal and replacement of the building's stair towers, stairs, and catwalk balconies. There is significant rusting and material deterioration in multiple locations amount these features, and these repairs will extend the property's useful life, ensure tenant safety, and meet building codes. This activity is nearing completion, and Section 3 and Targeted Section 3 worker data have not been collected yet. The City will report on worker hours and qualitative efforts as soon as the activity has been completed.

Activity #1272 Housing Lift - Village at Greenbriar was also funded for \$735,000 and meets the reporting threshold. This activity includes repairing and replacing sanitary and domestic water lines and installing backflow preventers. Repairs impacted all 232 units and will extend the property's useful life, ensure tenant safety, and meet building codes. This activity is also nearing completion, and Section 3 and Targeted Section 3 worker data have not been collected yet. The City will report on worker hours and qualitative efforts as soon as the activity has been completed.