



City of Thornton

**2020-2024 Consolidated Plan and 2020
Annual Action Plan**

July 23, 2020

Prepared by Community Connections Division

Parks, Recreation & Community Programs

Department

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Executive Summary

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

1. Introduction

The City of Thornton became a Community Development Block Grant (CDBG) entitlement jurisdiction in 2010 and is eligible to receive federal CDBG funds each year. This grant is designed to provide for the needs of low and moderate income families through the support of housing, economic development, public facility and infrastructure projects, and public service programs.

The U.S. Department of Housing and Urban Development (HUD) requires entitlement jurisdictions to submit a long-term strategic plan every five years; it is called the Consolidated Plan. This plan identifies the community's housing and development needs, funding priorities, goals, and objectives. It also provides strategies for achieving those goals and stipulates how federal funds will be allocated to housing and community development activities. It contains four parts:

- An analysis of demographic and economic conditions in the city;
- A review of housing conditions and affordability;
- A list of housing and community development needs as identified by the public; and
- An Annual Action Plan which includes the projects the entitlement desires to fund in the following year and the actions that will be taken to address homelessness, overcome barriers to affordable housing, increase residents' ability to be self-sufficient, and further fair housing.

As a CDBG entitlement jurisdiction and participating grantee of Home Investment Partnerships Program (HOME) funds through the Adams County Urban Consortium, Thornton and Westminster are considered 'participating grantees'. Adams County is considered the 'lead grantee' and is responsible for submitting the final collaborative plan on behalf of Adams County, Westminster and Thornton. Each entity is responsible for completing specific sections of the Plan.

To develop Thornton's sections of the Consolidated Plan, Thornton hired Western Economic Services, LLC to collect and analyze demographics, economic conditions, and information on housing in Thornton. All the qualitative and quantitative housing data was packaged into Thornton's 2019 Housing Needs Assessment, which includes the Analysis of Impediments to Fair Housing Choice, and is posted at <https://www.thorntonco.gov/community-connections/Documents/grant-resources/2019-hna-ai.pdf>. In addition, Thornton staff coordinated an extensive public input process to identify and prioritize the needs of the low-income population.

This section of the 2020-2024 Consolidated Plan was prepared in accordance with 24 Code of Federal Regulations Part 91. In addition, staff used "A Desk Guide for Using IDIS to Prepare the Consolidated Plan, Annual Action Plan and CAPER/PER" document provided by HUD to assist in completing the content of this plan. City staff followed the public input process identified in the Citizen Participation Plan to meet HUD's public input requirements.

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

Through community and stakeholder input and completion of the Housing Needs Assessment and Analysis of Impediments to Fair Housing Choice, Thornton has identified five priority needs and six goals for the five-year Consolidated Plan period. A list of needs and goals identified in the strategic plan appear below. Priority needs are described in detail in section SP-25 of this plan, and goals, including expected outcomes, are described in detail in section SP-45.

Priority Needs	Goals
Create and preserve housing affordability, accessibility, and quality	Increase and retain affordable units
Foster equitable access to city and neighborhood amenities and services	Improve existing owner-occupied units
Assist people who are experiencing homelessness and at-risk of homelessness	Expand home ownership opportunities
Assist populations with special needs	Provide homeless prevention and supportive services
Affirmatively further fair housing choice	Provide improvements to public facilities
	Provide increased public services

Table 1 - Priority Needs and Goals

3. Evaluation of past performance

Thornton identified four goal categories through its 2015-2019 Consolidated Planning process. These categories were: Affordable Housing, Public Facilities and Infrastructure, Public Services including Homeless and Non-Homeless Special Needs, and Economic Development. Each Consolidated Plan covers five Program Years. Thornton recently completed the fifth Program Year of the 2015-2019 Consolidated Plan period, which ended on June 30, 2020. Some highlighted outcomes from program years one through five include:

Affordable Housing: 1,003 households have been assisted through direct homebuyer assistance, single-family homeownership repairs, multi-family development/rehabilitation, and homeowner energy efficiency upgrades.

Public Facilities and Infrastructure: 64,366 persons have been assisted through public facility and infrastructure improvements. These improvements, all in low to moderate-income areas, include sewer/water installation, streetscape improvements, health facility upgrades, a facility for abused and neglected children, and drainage infrastructure.

Public Services: 1,813 persons were assisted through public services including homelessness prevention and supportive services to seniors.

4. Summary of citizen participation process and consultation process

HUD requires entitlement jurisdictions to provide opportunities for citizen participation in developing the Consolidated Plan. Citizen participation efforts that guided the development of the 2020-2024 Consolidated Plan included community listening sessions, a resident survey, the Housing Needs Assessment, stakeholder consultations, one public hearing, and a 30-day public comment period for the Draft Consolidated Plan, Annual Action Plan, and Analysis of Impediments to Fair Housing Choice. The consultation and citizen participation processes are described in detail in sections PR-10 and PR-15 of this plan.

5. Summary of public comments

Thornton will hold a 30-day public comment period from July 23 to August 24. After the conclusion of the public comment period, Thornton will hold a public hearing on August 25. A notice of the public comment period and public hearing was published in the Northglenn-Thornton Sentinel on July 23, which provided residents with information on how to submit comments to the draft Consolidated Plan and 2020 Annual Action Plan, as well as instructions on how to participate in the public hearing. All public comments and staff responses will be provided to HUD with the submission of this Plan.

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

All comments received during plan development and during the draft plan public comment period will be accepted and taken into consideration in developing the final Consolidated Plan.

7. Summary

Thornton's 2020-2024 Consolidated Plan identifies housing and community development needs, analyzes market conditions, and provides a framework for making data-driven, place-based investment decisions for utilizing CDBG funds. Thornton's HUD entitlement CDBG funding allocations for Program Year 2020 and projected allocations for the five-year Consolidated Plan period are described in SP-35. It should be noted that entitlement-funding allocations vary from year to year, and so the estimated five-year allocation is solely based on the allocation for the first program year.

The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	THORNTON	Parks, Recreation, and Community Programs Dept.

Table 2– Responsible Agencies

Narrative

The Community Connections Division within the City of Thornton is responsible for preparing Thornton's sections of the Consolidated Plan, administering Thornton's CDBG funds, and ensuring compliance with Federal regulations. Division staff present projects to City Council each year and reports regularly on the status of activities that are completed to address homelessness, affordable housing, community development, public services, and fair housing. This division resides within the Parks, Recreation, and Community Programs Department. Staff from the Finance, Contracts Administration, and Legal Departments provide support, as necessary. City Council approves projects, plan submittal to HUD, and substantial amendments to plans; the City Manager or the Director of Parks, Recreation, and Community Program authorizes various reports to HUD.

Consolidated Plan Public Contact Information

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

1. Introduction

Collaborating with private and nonprofit service providers, advocacy agencies, housing developers, and other key stakeholders that serve the low-income population creates a stronger force for addressing issues such as homelessness or near-homelessness. Collaboration and consultation is also at the core of the Community Connections Division's mission. For this reason, Thornton consulted with agencies that serve vulnerable populations during the public participation process in an effort to collect an accurate definition of the needs of the low-income and special populations and to confirm Thornton's desire to coordinate on future solutions to issues experienced by these populations.

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)).

Community Connections and, formerly, Neighborhood Services staff spent several months speaking with housing, health, and education providers and internal city departments when compiling information for the Housing Needs Assessment and the Consolidated Plan. The goal of the consultations was to determine the needs in the community that were not being adequately addressed and ways in which coordination between the entities could be enhanced.

Moving forward, Thornton will continue to be an active participant in regional efforts with public and private housing, health, and social service agencies in order to keep abreast of changing demographics, new trends, patterns or programs that impact vulnerable populations, and ideas to overcome challenges low-income people face in Thornton. This includes the regional planning initiatives by the Denver Regional Council of Governments, connecting residents with businesses and nonprofit organizations, and supporting efforts that help low and moderate-income residents become more self-sufficient. Thornton will continue to collaborate with local agencies and businesses to assist in developing a community that supports people of all incomes. Community Connections will also continue collaboration efforts with other city departments that work with partner agencies or provide services to specific populations like the Victims Advocate Division, Thornton's Police Department's High Density Housing Unit, and Code Enforcement. The Thornton Partnership for Multifamily Communities has been very successful in increasing communication efforts between Police, Community Connections, and housing managers of apartments and manufactured home parks. In addition, Community Connections will continue to coordinate meetings between other city staff and affordable housing developers, nonprofits, and service providers who are looking to expand their presence in Thornton.

In addition to CDBG funding, Thornton provides city general funds (local taxpayer dollars) to local nonprofit organizations to serve low-income and vulnerable populations through Thornton Assistance

Funds (TAF). In Fiscal Year 2019, \$150,000 was awarded in competitive grants to local public service agencies that provide basic needs and support self-sufficiency of Thornton residents. The consultations and collaborations as a result of the TAF process provides the city with valuable insights into the operations of several local service providers as well as further defines the needs, eligibility criteria, and barriers to service for their clients.

As the administrator of the Thornton CDBG funds, Community Connections will proactively reach out to organizations and departments that have or are considering projects intended to fill an unmet need to discuss how CDBG or other funding mechanisms might be used to assist with their activities. In addition, staff will explain the processes and requirements associated with different funding options. This will help to increase the capacity of the local agencies to serve the low and moderate-income populations.

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

Staff keep abreast of local homeless programs, services, and outreach efforts through the Metro Denver Homeless Initiative (MDHI), the Continuum of Care provider for a seven-county area including Adams County. Community Connections views its role as a promoter and supporter of efforts to help people, nonprofit organizations, and private organizations connect into this system. Community Connection staff continue to be active participants in the Adams County Coalition for the Homeless and serves in leadership roles for the county collaborative efforts for the Point in Time count and many other county-wide homelessness initiatives.

Thornton supports public and nonprofit initiatives to address homelessness. There is political support for these efforts; the Metro Mayor Caucus, of which the City of Thornton Mayor is a member, has defined homelessness as a topic they want to address in their communities. In the past, the city participated in the Homeless to Home Partnership meetings between local residents experiencing homelessness, housing providers, school district liaisons, and municipalities. These meetings lead to the creation of the Adams County Coalition for the Homeless (ACCH). ACCH is a network of community partners collaborating on housing and homelessness issues and solutions so that our community embraces safe, stable, healthy, and accessible housing for everyone so that homelessness is rare, brief, and one-time. In addition, Thornton amended the city code to allow for churches involved with the Adams County Cold Weather Care program to shelter people overnight on an emergency basis. Community Connections has developed homeless resource and housing brochures and a special section of the website is dedicated to listing basic need resources, such as food, health, housing, and transportation. Staff are also available to assist individuals in need by phone, email, or in person.

In addition, Community Connections leads Thornton's internal homelessness taskforce, which brings together several city departments including Police, Code Enforcement, Legal, Parks, and Fire to share data, provide program updates, and strategize best practices for preventing and eliminating homelessness.

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

This section is not applicable because the City of Thornton does not receive Emergency Solutions Grant (ESG) funds.

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

Table 3– Agencies, groups, organizations who participated

1	Agency/Group/Organization	Adams County
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Economic Development Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Thornton consulted with several Adams County departments including, Community and Economic Development and Community Safety and Well-Being. Staff from Thornton's Community Connections Division regularly consult with County staff to collaborate on homelessness initiatives, including regional Point in Time count efforts, affordable housing, and community development. The City and County will continue to work together to determine how best to address the regional needs and leverage support and resources.
2	Agency/Group/Organization	Maiker Housing Partners (Adams County Housing Authority)
	Agency/Group/Organization Type	PHA Services - Housing

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan. Community Connections works with staff from Maiker Housing Partners regularly to partner in the construction of new or rehabilitation of existing affordable housing, to provide emergency rent/mortgage and utility assistance, and on developing programs that move people towards self-sufficiency.
3	Agency/Group/Organization	Archway Housing & Services
	Agency/Group/Organization Type	Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan.
4	Agency/Group/Organization	Aurora Housing Authority
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan.
5	Agency/Group/Organization	Brighton Housing Authority
	Agency/Group/Organization Type	Housing PHA

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan.
6	Agency/Group/Organization	Brothers Redevelopment, Inc. (BRI)
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan. Community Connections works with staff from Brothers Redevelopment, Inc. regularly to partner in the rehabilitation of existing affordable housing units as part of Thornton's Home Repair Programs.
7	Agency/Group/Organization	Colorado Coalition for the Homeless
	Agency/Group/Organization Type	Services - Housing Services-homeless Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan. In addition, Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs of the Consolidated Plan.
8	Agency/Group/Organization	Colorado Community Land Trust
	Agency/Group/Organization Type	Housing Services - Housing Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan.
9	Agency/Group/Organization	Community Resources and Housing Development Corp.
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan. Community Connections staff coordinate with CRHDC to provide monthly home-buyer education workshops in Thornton. In addition, CRHDC is a past sub-recipient of CDBG funds and Community Connections regularly consults with this agency to provide greater opportunities for affordable housing in Thornton.
10	Agency/Group/Organization	DelWest
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by the city's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan.
11	Agency/Group/Organization	Commerce City Housing Authority Board
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan.
12	Agency/Group/Organization	HomeAid Colorado
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan.
13	Agency/Group/Organization	Mercy Housing, Inc.
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan.
14	Agency/Group/Organization	Metro West Housing Solutions
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan.
15	Agency/Group/Organization	Thistle Community Housing
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan.

16	Agency/Group/Organization	Urban Land Conservancy
	Agency/Group/Organization Type	Housing Services - Housing Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan.
17	Agency/Group/Organization	St. Charles Town Company
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan.
18	Agency/Group/Organization	Del Norte Neighborhood Development Corp.
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The agency was interviewed by Thornton's consultant for the Housing Needs Assessment (HNA) and Analysis of Impediments. The information provided was used to develop the HNA and helped guide the 2020 - 2024 Consolidated Plan.
19	Agency/Group/Organization	A Precious Child
	Agency/Group/Organization Type	Services-Children Services-homeless
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
20	Agency/Group/Organization	Amazing Grace Food Bank
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
21	Agency/Group/Organization	Adams County Emergency Food Bank
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
22	Agency/Group/Organization	FISH of Westminster, Inc.
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
23	Agency/Group/Organization	Food Bank of the Rockies
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
24	Agency/Group/Organization	Food for Hope
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
25	Agency/Group/Organization	Adams County Coalition for the Homeless
	Agency/Group/Organization Type	Services - Housing Services-homeless Regional organization Planning organization

	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections staff are active participants in the coalition and collaborates to determine the priority needs identified in the Consolidated Plan.
26	Agency/Group/Organization	Project Angel Heart
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
27	Agency/Group/Organization	Thornton Community Food Bank
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
28	Agency/Group/Organization	Clinica Family Health Services
	Agency/Group/Organization Type	Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan. In addition, Clinica Family Health Services is a current CDBG sub-recipient and Community Connections staff regularly consult with this agency to determine priority needs identified in the Consolidated Plan.
29	Agency/Group/Organization	Colorado Health Network
	Agency/Group/Organization Type	Services-Persons with HIV/AIDS Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
30	Agency/Group/Organization	Ensign Skills Center
	Agency/Group/Organization Type	Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
31	Agency/Group/Organization	Kids First Health Care
	Agency/Group/Organization Type	Services-Children Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
32	Agency/Group/Organization	Kids in Need of Dentistry
	Agency/Group/Organization Type	Services-Children Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
33	Agency/Group/Organization	Ralston House
	Agency/Group/Organization Type	Services-Children Services - Victims Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
34	Agency/Group/Organization	Ray of Hope Cancer Foundation
	Agency/Group/Organization Type	Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.

35	Agency/Group/Organization	Reaching HOPE
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
36	Agency/Group/Organization	Every Child Pediatrics
	Agency/Group/Organization Type	Services - Housing Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
37	Agency/Group/Organization	The Rocky Mountain Multiple Sclerosis Center
	Agency/Group/Organization Type	Services-Persons with Disabilities Services-Health Health Agency Private Sector Banking / Financing
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
38	Agency/Group/Organization	There With Care
	Agency/Group/Organization Type	Services-Children Services-Persons with Disabilities Services-Health

	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
39	Agency/Group/Organization	Third Way Center, Inc.
	Agency/Group/Organization Type	Services-Children Services-homeless Services-Health Child Welfare Agency
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
40	Agency/Group/Organization	VUELA for Health
	Agency/Group/Organization Type	Services-Health Health Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
41	Agency/Group/Organization	Access Housing Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
42	Agency/Group/Organization	Cold Weather Care
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
43	Agency/Group/Organization	Growing Home, Inc.
	Agency/Group/Organization Type	Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
44	Agency/Group/Organization	Urban Peak
	Agency/Group/Organization Type	Services-Children Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homelessness Needs - Unaccompanied youth

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
45	Agency/Group/Organization	Audio Information Network of Colorado
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities Services - Broadband Internet Service Providers
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan. In addition, this agency provides small cell broadband installations and the city collaborates with this agency to bridge the digital divide, especially among Thornton's population of seniors and people with disabilities.
46	Agency/Group/Organization	Court Appointed Special Advocates Adams/Broomfield
	Agency/Group/Organization Type	Services-Victims of Domestic Violence Services - Victims
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
47	Agency/Group/Organization	Center for People with Disabilities
	Agency/Group/Organization Type	Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
48	Agency/Group/Organization	FAMILY TREE, Inc.
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence Services-homeless Services - Victims
	What section of the Plan was addressed by Consultation?	Homelessness Strategy Homeless Needs - Families with children
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
49	Agency/Group/Organization	Colorado Youth for a Change
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
50	Agency/Group/Organization	HOPE House
	Agency/Group/Organization Type	Services-Children Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
51	Agency/Group/Organization	Joyful Journeys Community Enrichment
	Agency/Group/Organization Type	Services-Children Services-Health Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
52	Agency/Group/Organization	Lutheran Social Services of Colorado
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
53	Agency/Group/Organization	Mile High United Way
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Education Services-Employment

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
54	Agency/Group/Organization	Reach Out and Read Colorado
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
55	Agency/Group/Organization	Senior Hub
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan.
56	Agency/Group/Organization	Seniors' Resource Center
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Connections interviewed this agency as part of the Thornton Assistance Funds (TAF) process and collaborates with the agency on programs funded through TAF to determine the priority needs identified in the Consolidated Plan. In addition, Seniors' Resource Center is a past CDBG sub-recipient which provided senior supportive services to Thornton's aging population.
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Identify any Agency Types not consulted and provide rationale for not consulting

No organizations were intentionally excluded from the consultation process. In addition, during the development of the Housing Needs Assessment, the consultant reached out to developers, real estate representatives, school districts liaisons, nonprofits, and housing professionals.

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)	Similar to the City of Thornton's strategic plan, MDHI's goals are aimed at supporting at-risk and currently homeless individuals and families by increasing: The availability of stable housing; The incomes of individuals through employment by addressing the challenges/benefits of employment, improving coordination with local workforce centers and developing a data base of employment specialists and employment projects; The number of participants obtaining mainstream benefits; and Support to and coordination of agencies that regularly discharge people into homelessness (i.e. foster care, mental health, health agencies, etc.). The specific goals established by MDHI based on input from the seven counties include: Target resources for populations in need; Identify resources to better meet supportive service needs; Stronger regional data; Increase regional coverage of Notice of Funding Availability (NOFA) grant services; Improve access to resources/establish front door efficiencies; and Increase housing resources.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Station Area Master Plans (STAMP)	City of Thornton - Policy Planning	The city's Station Area Master Plans analyze the needs around the proposed commuter rail stations in Thornton. Based on information obtained through qualitative and quantitative data, including public input, the plans outline the most beneficial and comprehensive land uses including a mix of housing and facilities for each of the stations. Two of the stations fall within the CDBG-eligible neighborhoods and include vacant parcels that could provide additional housing opportunities, community facilities or schools for the low-income population.
Comprehensive Plan	City of Thornton - Policy Planning	The Comprehensive Plan is currently under a major rewrite for 2020 and overlaps with the Consolidated Plan by establishing major strategies and key policies for Thornton's neighborhoods, future jobs, and potential amenities for city residents. It also serves as an advisory document for development in the city. This Plan gives a broad overview of how the city will grow, and where future development or redevelopment will occur.

Table 4– Other local / regional / federal planning efforts

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

Thornton worked with Adams County and other county municipalities to coordinate outreach efforts in obtaining public input and conducting consultation. The jurisdictions co-facilitated outreach efforts in an attempt to diminish overlap and expand the outreach provided to the community. This includes a countywide housing and economic needs resident survey, sharing data and information that was gathered at community events and public meetings, and collaboration on a variety of affordable housing and homelessness initiatives. The entities also shared information, data, and reports obtained through each respective jurisdiction's research to ensure that there was not duplication of efforts and that information between jurisdictions was not contradictory.

Looking towards the future, Thornton will continue coordination with Adams County and local municipalities to evaluate the needs of the community and where commonalities exist, as well as collaborating on funding to ensure all residents living in the county have access to the same service. In the past, Thornton and Federal Heights, a city that shares a border with Thornton, used CDBG funds to complete a project that crossed jurisdictional boundaries. Thornton is open to taking part in a collaborative process should the opportunity present itself again.

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

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

Thornton made a concerted effort to ensure the participation of low-income and special needs individuals in the development of the Consolidated Plan and Annual Action Plan. The efforts were conducted over the span of more than 18 months in an attempt to get a comprehensive and accurate gauge of the true needs in the Thornton community. The first effort was during the development of the 2019 Housing Needs Assessment which included multiple surveys and interviews with key stakeholders as well as an evaluation of the housing and community development data from a wide variety of sources. The second effort focused around the needs of the low-income population and included a series of public outreach efforts that primarily focused on resident input with a secondary focus on the consultation with service providers. Both of these efforts provided the city with a comprehensive data set that represented both qualitative and quantitative information. The priority survey that was completed by residents during the outreach efforts helped to set the stage for developing the priority needs, which in turn were used to develop the goals and objectives for the CDBG program over the next five years. The third effort was the public hearing and public comment period for the Consolidated Plan and Annual Action Plan.

Citizen Participation Outreach:

Resident Survey	Minorities Non-English Speaking - Specify other language: Spanish Non-targeted/broad community	The city conducted a citywide survey in English and Spanish for the Housing needs Assessment. Six hundred eighty seven responses were received.	Out of the 687 respondents that completed the survey, 28.2 percent were between the ages of 55 and 65, 24.3 percent were between the ages of 65 and 75, and 17.2 percent were between the ages of 30 and 45. Over 91.4 percent of respondents are homeowners, versus 4.2 percent who rent, and 4.4 percent that did not answer the question. A vast majority of respondents only have one family living in their home, and 8.2 percent of respondents have two families living in the home. Only 1.5 percent have three families living in the home; however, 2 percent have four families living in the home. 103 respondents have someone in the household with a physical disability, 18 have someone in the household with a visual disability, and 45 have someone in the household with a hearing disability. There were 45 respondents with someone in the household who has a mental health disability, and 18 respondents have someone in their household with a cognitive disability. The most common reason for the respondent living in their current community is the cost of housing,	All survey responses were accepted and included in the Housing Needs Assessment.
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			followed by the distance from home to shopping, restaurants, healthcare, or other services. A majority of respondents said it was important to live within 15-minute walk or bike ride of a grocery store and parks or trails. If respondents think there are housing types missing in Thornton, they are most likely to think the city is missing age restricted apartments, condos, or patio homes, followed by assisted living for the elderly.	
Resident Survey	Employers	The City of Thornton Employer Survey was conducted in late 2018 via telephone interview and included 20 employers from the city. This survey gathered feedback on the perceived need for workforce housing in the city.	Out of the 20 respondents from the survey, some nine companies had between six and 15 people employed, five had less than five people employed, three had between 16 and 25 people employed, two had between 101 and 250 people employed, and one had between 501 and 1,000 people employed.	All survey responses were accepted and included in the Housing Needs Assessment.

Public Meeting	Non-targeted/broad community	A public input meeting was held on January 31, 2019. This meeting was held to provide residents and stakeholders preliminary information gathered for the Analysis of Impediment (AI) and offer and opportunity to provide feedback and insight into fair housing in the city.	Need for a variety of housing units that meet a variety of incomes; Many working households are spending more than 30 percent of their income on housing; Rental prices are not affordable as well; Zoning should be looked at to allow for more multifamily housing; The Thornton workforce cannot live in Thornton; NIMBYism (Not In My Back Yard) continues to be a challenge.	All comments were accepted and included in the Analysis of Impediments to Fair Housing Choice.
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Public Meeting	Residents of Public and Assisted Housing Affordable Housing Developers	During this input session, the Mayor of Thornton asked questions of local housing professionals, ranging from nearby housing authority managers to for profit developers.	The discussion focused how often times the community will come together to shut down an Affordable Housing project that they believe will affect their neighborhood, or their property values. There was a general agreement that community education is critical to increasing the support for Affordable Housing projects. When the community hears "affordable", they think "transient" and assume that this development will be full of drugs, crime, and homelessness. What the community needs to realize, according to these stakeholders, is that these housing projects are for the working class within their community. The homes they are trying to build are for people who make \$60,000 or less a year. These are homes for the people that work for and with the community. When people realize that their children are the potential buyers of these homes, often their attitude shifts. The discussion touched on the usage of language to describe these projects and how to be honest about the project being an Affordable project without creating the wrong image	All comments were accepted and included in the Housing Needs Assessment and Analysis of Impediments to Fair Housing Choice.
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Resident Survey	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	A countywide resident survey, available in print and online formats in both English and Spanish, received 1,708 response, of which 525 were from Thornton residents.	This survey captured resident demographics, housing status and housing/community development needs.	A minimal amount of surveys were received from non-Adams County residents and where not included in the survey analysis.
Public Hearing	Non-targeted/broad community	Thornton will hold a public hearing on August 25th, 2020 to provide residents with an additional opportunity to weigh in on the draft Consolidated Plan and 2020 Annual Action Plan.	A summary of comments received at the public hearing will be included with the submission of this plan to HUD.	All public comments will be accepted into this plan and submitted to HUD.

Public Meeting	Non-targeted/broad community	Thornton is working in conjunction with Adams County and local municipalities to host a community meeting during 30-day public comment period of this plan.	A summary of comments received at the public hearing will be included with the submission of this plan to HUD.	All public comments will be accepted into this plan and submitted to HUD.
Newspaper Ad	Non-targeted/broad community	Thornton will publish a notice of the 30-day public comment period and public hearing in the Northglenn-Thornton Sentinel newspaper. This notice will provide residents will instructions on how to submit comments and information on how to attend the public hearing.	A summary of comments received at the public hearing will be included with the submission of this plan to HUD.	All public comments will be accepted into this plan and submitted to HUD.

Table 5– Citizen Participation Outreach

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Thornton is the most populous city in Adams County, and the sixth most populous in the state. Located approximately ten miles north of downtown Denver and adjacent to Interstate 25, Thornton has easy access to various transportation routes. It continues to be an affordable place to live with families making up the largest composition of the community.

Thornton has many opportunities for future development with five of the six commuter rail stops coming into the city and many large parcels of land being evaluated for new residential and commercial development. Thornton will monitor how this growth will affect the needs of the low-income community through the Annual Action Plans and end of year reports that are submitted to HUD.

The primary housing needs and challenges facing Thornton, as identified in the Housing Needs Assessment and through feedback from the Thornton community, fell into the following categories:

1. Unmet housing needs for many households. This represents existing households with a housing problem, especially those with cost burdens. Over 14,000 households had a cost burden (housing costs greater than 30 percent of household income) or severe cost burden (housing costs greater than 50 percent of household income) in 2017, representing 32.2 percent of the population. Renters are even more strongly hit, with 51.6 percent experiencing a cost burden.
2. Increased demand for rental/multifamily housing. The rate of renting has increased in Thornton over the past decade. Since homeownership is declining, the need for additional rental units will be necessary to accommodate rental households.
3. Demand for both rental units and homeownership housing over the forecast horizon. Rising housing prices, coupled with a low rental vacancy rate with high rental rates, are reflective of the growth that Thornton has already experienced. Thornton is expected to grow to over 66,000 households by 2040. Assuming the existing forecast is accurate, there are expected to be an additional 5,000 renter households and 12,000 owner households. Over 6,300 of these new households are expected to be low to moderate income households.
4. Need for new construction. The population is expected to rise by 17,000 households by 2040. The current rate of production is around 1,000 units per year. At this rate, the growing housing stock will be able to accommodate new residents. However, housing units must be available in a range of price points in order to accommodate all income levels and the 6,300 low to moderate-income households expected by 2040.

5. Aging population. Thornton is experiencing an increase in the number of senior citizen households in the city. As this population continues to grow, it will increase the need for renovations of existing housing stock, as well as the need for senior housing facilities with access to services.

6. Concentrated Housing Problems. Housing problems are concentrated in the southern part of the city, particularly in Ward 1.

Since many of these findings are tied directly to the private real estate market, Thornton will need to explore various means to address these challenges. Ideas could include supporting agencies that provide subsidized housing through tenant based rental assistance or housing vouchers; funding down payment assistance programs; educating residents on the housing resources that are available to them; and incentivizing developers to provide affordable housing in the northern area of Thornton located near transit, employment and supportive services. Thornton will build upon existing relationships as well as develop new ones with agencies that can help address these needs.

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

Describe the jurisdiction's need for Public Facilities:

The results of the public input and consultation process indicated the need for better access to parks and recreation in Thornton's low income areas, facilities that provide services and programming for seniors, and a centralized location for low income residents to apply for public services/assistance and build self-sufficiency through on-site job training, life skill coaching, financial literacy courses, and homebuyer education workshops.

Significant public facility upgrades are already underway such as the newly constructed Active Adult Center, which is located just to the north of several of the city's low-moderate income census tracts. This new facility will open in the summer of 2020 and will continue to provide much needed programs and resources for Thornton's aging community. In addition, the Community Connections division will occupy the former Active Adult Center site, which is in the heart of Original Thornton and in a community that is predominantly made up of both low to moderate-income residents and the city's minority populations. This new neighborhood service center will provide a vast array of resources and services to this community and will serve as a central hub for residents to apply for assistance programs, including CDBG-funded programs offered by the city.

Further, Thornton's 2020 update to its Comprehensive Plan outlines several of Thornton's public facility needs, such as: the inclusion of art in public places, facilities, infrastructure, private developments to enhance the community's cultural vitality and vibrancy; create and expand upon existing city recreational programs and activities to establish additional affordable opportunities that meet the needs of residents of all ages, including families and youth; opportunities and proper accommodations to ensure recreational programs are accessible and available to persons with disabilities and/or special needs; continue to expand, enhance, and provide linkages between the city's parks, trails, and open space system to establish a well-connected greenway system; and to ensure that a broad range of accessible parks, open space and recreational facilities are equitably distributed throughout Thornton.

How were these needs determined?

These needs resulted from the results of the priority needs survey, consultation and collaboration with local service providers, and meetings with residents in the preparation of this plan and the city's updated Comprehensive Plan.

Describe the jurisdiction's need for Public Improvements:

The results of the public input and consultation process indicated the need for the following types of facilities to serve low and moderate income Thornton residents: safe neighborhoods through public

improvements such as the installation of sidewalks, improved flood and drainage infrastructure, and expanded access to transportation services.

The neighborhoods most in need of these improvements are located in southern Thornton and have outdated infrastructure that may not meet the capacity needed today and require replacement. Needed improvements should focus on safety, such as lighting, removing tripping hazards, accessibility for those in wheelchairs, and adequate drainage that can decrease the chance of flooding. Major improvements to transportation access are well underway, with the anticipated opening of the Regional Transportation District (RTD) North Line (N Line) in the fall of 2020. This line will serve residents in south Thornton through two commuter rail stops, with a third just south of Thornton in Commerce City.

How were these needs determined?

These needs resulted from the results of the priority needs survey, consultation and collaboration with local service providers, and meetings with residents in the preparation of this plan and the city's updated Comprehensive Plan.

Describe the jurisdiction's need for Public Services:

The Thornton Assistance Fund program, which provides city general funds to meet the basic needs of residents and promote self-sufficiency, allows Thornton the opportunity to consult and collaborate with several of the region's public service providers. This program seeks to maximize Thornton residents' ability to access public service providers in the realms of food access, housing, health care, and human services. One goal of this program is to fill public service gaps and to collaborate with other providers to expand services and offerings to engage underrepresented groups and growing populations, such as people with disabilities, at-risk youth, working families, seniors, homeless or near homeless, and members of the Latino and other ethnic-minority communities. Thornton's creation of the Community Connections division, which will soon open a neighborhood service center in close proximity to several low and moderate-income census tracts, will also be a valuable asset in providing Thornton residents access to public services.

How were these needs determined?

These needs resulted from the results of the priority needs survey, consultation and collaboration with local service providers, especially those funded with Thornton Assistance Funds, and meetings with residents in the preparation of this plan and the city's updated Comprehensive Plan.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The population in Thornton has expanded at a relatively fast rate over the last 17 years, rising from 82,506 people in 2000 to 136,978 in 2017. The population in Thornton is also aging, with those aged 55 and older growing at a faster rate than the rest of the population. The racial and ethnic make-up of Thornton is shifting as well. The Hispanic population has grown by over 141 percent, or almost 25,000 people between 2000 and 2016, while the white non-Hispanic population grew by 37.7 percent. The Asian population has also grown to account for more than 5.0 percent of the population in 2017.

The labor force in Thornton has continued to grow in recent years, reaching 75,021 in 2017. Unemployment in Thornton has followed a similar pattern to the State of Colorado, falling over the past few years. By 2017, the unemployment rate in Thornton was 2.8 percent. However, the COVID-19 pandemic has had severe impacts on Thornton's workforce. Unemployment rates in Thornton reached a record-high of 11.3%, although, at the time of this plan's publication, unemployment numbers are beginning to fall as Thornton's economy slowly reopens.

The poverty rate in Thornton has decreased from 9.9 percent in 2010 to 8.2 percent in 2016. There were an estimated 10,570 persons living in poverty in 2016, some 375 of which were senior citizens and 1,367 were children under the age of six. The housing stock in Thornton rose 53.9 percent between 2000 and 2016, from 29,481 units in 2000 to 45,973 units in 2017. Homeownership in the area declined over the period, from 77.7 percent to 70.3 percent in 2010. Single-family units accounted for 72.1 percent of units in 2017.

Production peaked in 2001 at 2,381 units before falling to a low of 240 units in 2009. This grew again to 1,034 units in 2017. In recent years, single-family unit production has greatly outpaced multi-family units. The real value of single-family building permits increased from \$246,912 in 2011 to \$359,399 in 2017. Single-family units' median values were highest in the northern part of the city in Wards 3 and 4. Rental prices were also highest in these areas.

Households that experience one or more of the housing problems are considered to have unmet housing needs, including overcrowding, incomplete plumbing or kitchen facilities, and cost burdens. The most common housing problem was cost burden, and 32.2 percent of households in 2017 had a cost burden. Renters were even more heavily impacted; with some 51.6 percent of renters were cost burdened or severely cost burdened.

The Housing Needs Survey found that there is a need for a variety of housing types in the city, that residents value close proximity to groceries and parks and trails, and there may be a continued need for senior and accessible housing in the city.

The Employer Survey found that many employees in the city do not live in the city. This seems to also be true for many residents that commute out of the city for work. The availability of housing in the city may not meet the needs of the current workforce. To balance this, Thornton's City Council pass a resolution in 2017 that called for a .75 jobs-to-housing ratio.

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

Introduction

With over 140,000 people, Thornton is the sixth largest city in Colorado. Thornton plans to grow to approximately 250,000 people and is well prepared for this future growth, having invested hundreds of millions of dollars in infrastructure in the city, including a water project that will provide Thornton with all the water it needs for future growth.

Thornton is located primarily on the east side of I-25 between 84th Avenue and Highway 7. With over 1,400 acres of developable commercial land along the I-25 corridor, Thornton offers plentiful opportunities for commercial development and is easily accessible with its eight interchanges along I-25, three along E-470, and close proximity to I-70, US 36, and Denver International Airport (20 minutes). Thornton is located just 10 miles north of downtown Denver and within 1 hour of the Rocky Mountains' world-class outdoor recreation. The city will soon be located along the North Line of the FastTrack's transit network and will have three stations here. The North Line is set to open in the fall of 2020.

Thornton is seeing incredible commercial activity. Recent openings include a 2M+ sq. ft. Amazon Sort and Robotics Center, the 350,000 sq. ft. Simon Premium Outlets, and a new Topgolf facility. Development activity in Thornton is at an all-time high.

There are nine major universities and colleges located within a 45-mile radius of the community, as well as numerous smaller institutions of higher learning. In addition, Thornton businesses have access to a metro Denver workforce exceeding 2 million.

This section provides an overview of employment, workforce characteristics, and earnings in Thornton. The data presented were pre-populated by the HUD eCon Plan tool, using 2011-2015 American Community Survey, and supplemented with Thornton's most recent economic development data.

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	1,127	11	2	0	-2
Arts, Entertainment, Accommodations	6,857	3,890	13	19	6
Construction	4,906	1,281	10	6	-4
Education and Health Care Services	7,418	4,601	15	23	8
Finance, Insurance, and Real Estate	3,368	965	7	5	-2
Information	1,584	402	3	2	-1
Manufacturing	5,054	1,046	10	5	-5
Other Services	1,791	728	4	4	0

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Professional, Scientific, Management Services	5,819	1,153	11	6	-5
Public Administration	0	0	0	0	0
Retail Trade	6,648	5,205	13	26	13
Transportation and Warehousing	2,708	163	5	1	-4
Wholesale Trade	3,716	687	7	3	-4
Total	50,996	20,132	--	--	--

Table 6 - Business Activity

Data 2011-2015 ACS (Workers), 2015 Longitudinal Employer-Household Dynamics (Jobs)
Source:

Labor Force

Total Population in the Civilian Labor Force	70,010
Civilian Employed Population 16 years and over	65,405
Unemployment Rate	6.58
Unemployment Rate for Ages 16-24	23.11
Unemployment Rate for Ages 25-65	4.42

Table 7 - Labor Force

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	15,415
Farming, fisheries and forestry occupations	2,985
Service	6,855
Sales and office	16,390
Construction, extraction, maintenance and repair	7,040
Production, transportation and material moving	3,520

Table 8 – Occupations by Sector

Data Source: 2011-2015 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	31,060	50%
30-59 Minutes	25,720	42%
60 or More Minutes	4,725	8%
Total	61,505	100%

Table 9 - Travel Time

Data Source: 2011-2015 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	5,660	475	2,170
High school graduate (includes equivalency)	13,595	985	3,385
Some college or Associate's degree	18,935	1,030	3,295
Bachelor's degree or higher	16,750	555	2,015

Table 10 - Educational Attainment by Employment Status

Data Source: 2011-2015 ACS

Educational Attainment by Age

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	234	1,025	830	1,505	665
9th to 12th grade, no diploma	1,490	1,659	1,205	2,075	915
High school graduate, GED, or alternative	3,975	4,685	4,625	8,675	3,720
Some college, no degree	4,075	4,795	4,530	7,130	2,330
Associate's degree	495	2,175	2,195	2,475	664
Bachelor's degree	689	4,760	4,345	4,575	1,150
Graduate or professional degree	170	1,055	2,265	2,330	895

Table 11 - Educational Attainment by Age

Data Source: 2011-2015 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	51,410
High school graduate (includes equivalency)	88,700
Some college or Associate's degree	92,681
Bachelor's degree	116,999
Graduate or professional degree	125,622

Table 12 – Median Earnings in the Past 12 Months

Data Source: 2011-2015 ACS

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

The top employment sectors in Thornton, ranked by the highest number of workers, are education and health care services at 7,418, arts, entertainment and accommodations at 6,851, closely followed by retail trade at 6,648. Two of the three largest employers are public sector organizations: Adams 12 Five Star Schools and the City of Thornton (as identified in the Major Employers table below), with the new Amazon distribution center ranking second with 2,300 jobs. Thornton's Economic Development Department focuses on increasing jobs from companies that produce goods and/or services for customers that are predominantly outside the community.

Describe the workforce and infrastructure needs of the business community:

Thornton has limited opportunities for higher paying jobs, which could be attributed to the fact that 93% of Thornton residents leave the city to work elsewhere. To address this, the Economic Development Department has focused its efforts on attracting employers that pay higher wages. The city also recognizes that workforce drives most relocation and expansion decisions, so the department offers custom workforce reports using labor market, industry, and demographic data that provide insight into the regional labor market, industries, occupations, demographics, supply chain, workforce trends, economic impacts, skills, and job compatibility.

To further meet the needs of the business community, Economic Development Department has an online, interactive tool that allows potential employers to search the existing commercial and office properties and look through the inventory of land available for future development that are for sale or lease. Not only are these tools beneficial for businesses, they are helpful to nonprofit organizations that may be interested in moving their offices to Thornton.

Almost 80% of the businesses in Thornton are considered small businesses with 20 employees or less. To support the smaller businesses, Thornton provides the Business Improvement Grants (BIG) for physical improvements that will result in the creation and retention of jobs, increased sales revenue, and

increased capital investment in Thornton facilities. Other services, such as free commercial graffiti removal, sales use and tax workshops, and incentives for business expansion and job creation, are offered. The city partners with North Metro Small Business Development Center for free one-on-one counseling for small businesses.

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

Thornton's commercial development is expected to grow during the next five years; this expectation is based on development projects in the planning process currently and the commuter rail line that will open in 2020.

The Grove off I-25 and 144th Avenue is a new retail center that started off with the opening of the Cabela's sport store and has grown to add new stores, including Boot Barn, Firehouse Subs, a gas station and Lazy Boy Furniture. There is still retail space available at this location. This development brought new utilities to this northern area of Thornton and has spurred other developers to submit project plans close to this area, including an outlet mall, Top Golf and a bowling center.

The Regional Transportation District (RTD) is currently completing work on the commuter rail that will run through Thornton. Each of the three rail stops have raw land near it that can be developed. The city has completed station area master plans for transit-oriented development around two of the stops. As a result of this future public transportation, landowners at these stops have received several proposals from housing and commercial developers.

To support future growth in jobs, Thornton may refer companies to the Adams County Workforce Center. This agency assists companies in recruiting highly trained and qualified employees. Employers also have access to a diverse set of resources and expertise to assist with customized training and supportive services, bonding services and tax credits, job fairs and postings, recruiting, prescreening and personnel services. Thornton residents who are interested in working for one of these new employers can take advantage of the free services offered at the center, including classes on computer skills, job searches, career assessments, resume writing and effective interview skills.

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

For those members of the current workforce who have higher education and skill sets, companies like Amazon, Intrex Aerospace, US Engineering, Verizon, Avaya and medical companies will provide new opportunities for finding jobs that may fit their experience and salary requirements thus allowing them to live and work in the Thornton community. Some companies like Intrex offer on-the-job training to help build their employee base who may not have the right skill sets yet.

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

First, the Adams County Workforce Center provides free services as described above. Second, the Economic Development staff promotes the Colorado FIRST program that provides grants to companies that are locating or expanding in Thornton and provides funds to net new hires. For those residents who are seeking a higher education, several options are available. Thornton hosts Everest College with 407 students and Regis Dual Language University with 100 students and offers access to a wide variety of colleges and universities as noted in the Higher Learning Programs attachment below.

Since Community Connections works with many of the nonprofits like Center for People with Disabilities and Arc of Adams County, both of which support people with disabilities through employment training, staff can share these resources with agencies to help increase their capacity and future employment of their clients.

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

Yes

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

The Economic Development department focuses on a number of areas related to the economic vitality of Thornton. These areas include increasing primary employment in the City, continuing to attract commercial development to provide amenities and revenue, supporting small businesses, and helping to promote revitalization in areas of the City. City Council passed a resolution in 2017 setting a long-term goal of 0.75 jobs per housing unit as an ongoing effort to balance the mixture of jobs and housing in the community. The city also adopted the Economic Development Strategic Plan in April 2014.

Discussion

The labor force in Thornton has continued to grow in recent years, reaching 75,021 in 2017. Unemployment in Thornton has followed a similar pattern to the State of Colorado, falling over the past few years. By 2017, the unemployment rate in Thornton was 2.8 percent. However, during the development of this plan, Thornton began suffering the effects of the Coronavirus pandemic. Business closures, layoffs, and furloughs resulted in unemployment rates in Thornton reaching a record-high of 11.3%. However, at the time of this plan's publication, unemployment numbers are beginning to decline as Thornton's economy slowly reopens.

Business Name	Product/Service	Employees
Adams 12 Five Star Schools	K-12 Education	4,400 (entire district, not solely Thornton)
Amazon	Distribution	2,300
City of Thornton	City Government	963
North Suburban Medical Center	Full-Service Hospital	850
WalMart Stores	Retail Trade	737
King Soopers	Grocery Stores	503
Appliance Factory Outlet	Distribution	500
The Summit	Entertainment	450
Top Golf	Entertainment	450
Dish Network	Satellite TV & Equipment	400
Home Depot	Retail Trade	320
Avaya, Inc.	Telecommunications	310
Safeway Stores	Grocery Stores	308
AMI Mechanical	Commercial Mechanical Contractor	289
Cabela's	Outdoor Recreation Retail	250
Vibra Hospital	Rehabilitation & Long-Term Acute Care	241
Centura Health - Villas at Sunny Acres	Healthcare & Assisted Living	231
McDonald's	Food Service	231
Sam's Club	Retail Trade 230	230

Table 13 - Thornton's Major Employers

MA-50 Needs and Market Analysis Discussion

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

There are certain areas in Thornton that experienced a higher rate of housing problems than others. These areas are primarily in Ward 1, where census tracts see housing problems at a rate between 55.4 and 60.6 percent. In fact, three census tracts in Ward 1 see housing problems that exceed the disproportionate share, or 10 percentage points higher than the jurisdiction average. No other wards in the city see a disproportionate share of concentrated housing problems.

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

According to HUD, an area of racial and ethnic concentration is defined as where the percentage of persons in a particular race or ethnic group is at least 20 percentage points higher than the percentage of persons in the category for the city as a whole. For the purposes of this question, concentration of racial or ethnic minorities or low-income families will follow this definition.

Of Thornton's total population, 33.4% of the residents identify themselves as Hispanic. Some tracts in the southern portion of Thornton consist of more than 54% Hispanic population according to ACS data thus indicating a higher concentration in this area. The area also coincides with the highest proportion of families living below the median area income. ACS data indicates that with the exception of American Indian/Alaskan Natives, White Non-Hispanic populations have a lower percentage of individuals below the poverty rate than other races. Hispanic or Latino populations are three times more likely to fall below the poverty rate than their Caucasian counterparts. The attached maps show the concentration of the poverty rate and persons of Hispanic origin.

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

The southern areas of Thornton are not only where higher concentrations of the low-income and minority population reside, but this also represents the oldest sections of the city. Aging infrastructure, older commercial buildings, and housing stock that is over 50 years old are some of the characteristics in this area. However, these areas have also seen reinvestment not only from CDBG funds but also urban renewal and transportation efforts. Since 1983, Thornton has invested over \$14 million of CDBG funds with a good portion going towards projects that contribute to the revitalization of these neighborhoods including streetscape, community facility improvements, new sidewalks to address accessibility, and housing rehabilitation programs.

The majority of Thornton's affordable housing stock is located south of 120th; this includes apartments and manufactured home parks. While single-family homes exist in all areas of the city, home values in the southern area generally fall at or below \$321,800 while they are greater than \$500,000 in the

northern sections (as indicated in the attached map). This means that those who wish to live north of 104th may not be able to rent or buy in this north section of the city because they cannot afford it, as explained in the 2019 Housing Needs Assessment. This issue is a result of the private market forces. Typically, private housing developers and owners cannot afford to construct or offer housing below market rate; housing developers/owners must use grants and subsidies to provide affordable housing or the housing must be less desirable by the general market, and, thus, offered at a lower price.

Are there any community assets in these areas/neighborhoods?

There are many community assets in these neighborhoods. The city will have brand new commuter rail stations opening in the fall of 2020 at 88th and Welby, 104th and Colorado, and 12th and Eastlake. There is a concentration of medical services located close to I-25 and Thornton Parkway, including the North Suburban Hospital, Clinica Family Health Services, Vibra Hospital, and the Cancer Care Center. Many nonprofit organizations, such as Community Reach Center, Center for People with Disabilities and Rocky Mountain Youth Clinics, that provide affordable mental and physical health services to the low-income populations are located in this area. The Mapleton School District completed a major expansion of their facilities at the Skyview Campus, which is located adjacent to the 88th and Welby transit oriented development site. The state-of-the-art school buildings for kindergarten through high school and a library are surrounded by several athletic fields that are programmed through the city and the school. Besides the Mapleton campus library, there is another fairly new library west of I-25 side with internet access. There are 20 parks nestled into the residential neighborhoods, as well as a community center, public pool, and arts and culture center, with a neighborhood service center scheduled to open in 2020.

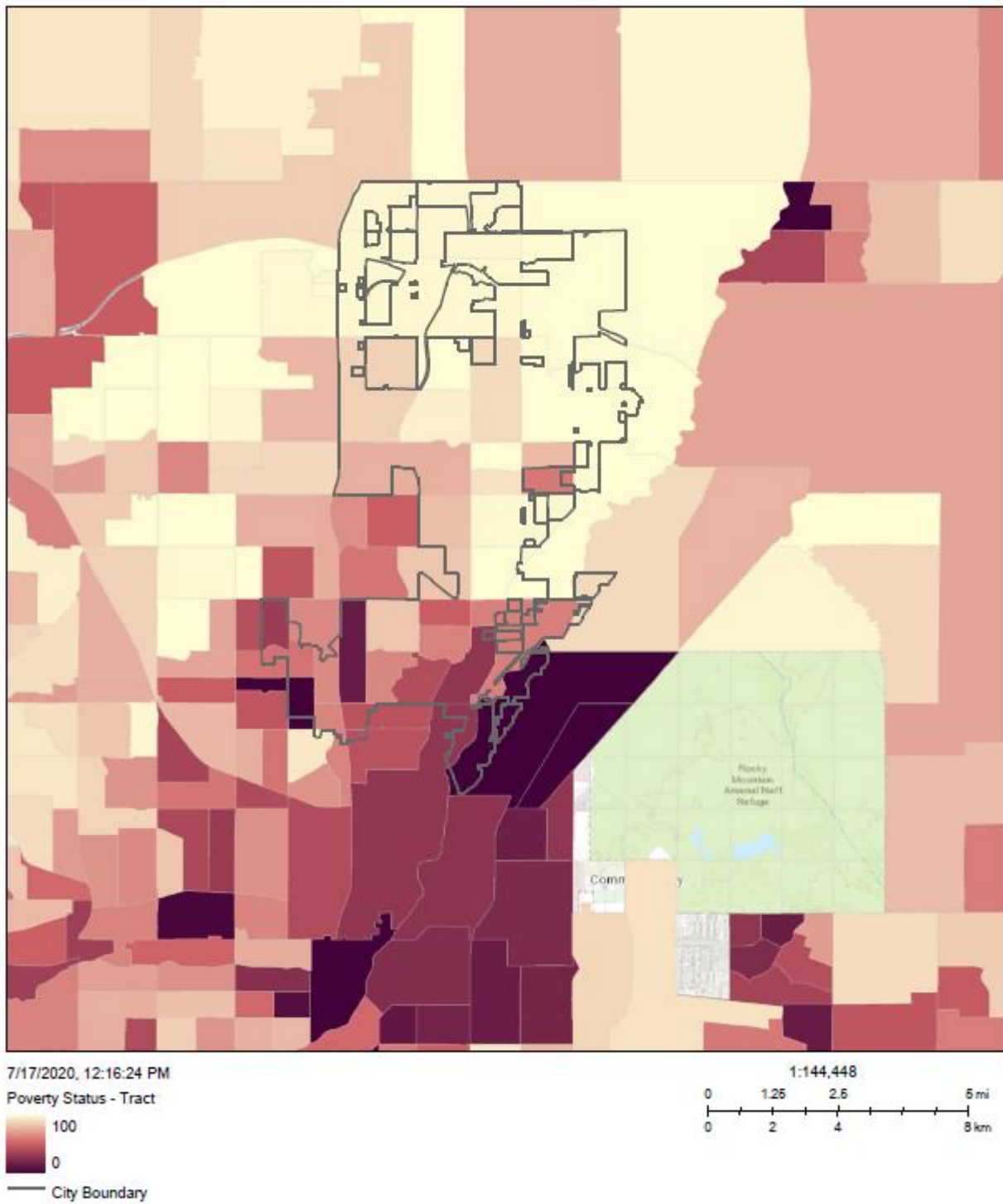
Are there other strategic opportunities in any of these areas?

There are opportunities for both redevelopment and new development that can positively impact this area. Revitalizing the Thornton Shopping Center, located at the heart of south Thornton, from a center of mostly vacant buildings to one that can once again be a valuable community center remains a high-ranking concern for Thornton residents and City Council members. Clinica Family Health Services, a medical and dental clinic serving low-income people, expanded its facilities in 2013, added solar panels in 2014, and is currently under construction for additional ADA improvements. CDBG funds continue to be used for a portion of these improvements. The New America School opened in early 2014 and serves the educational needs of English language learners and students not succeeding in traditional public schools.

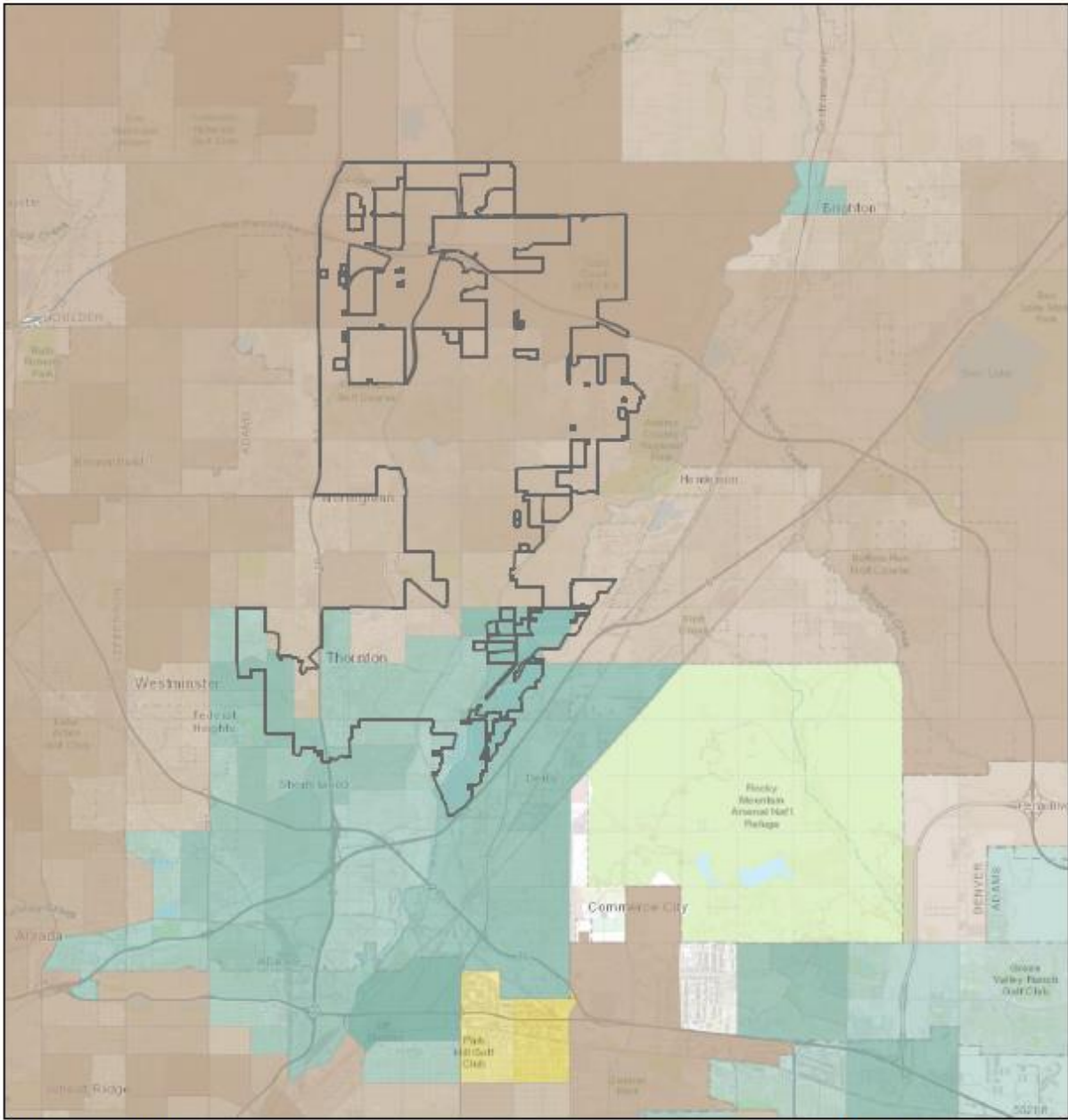
The future addition of the commuter rail will have stops in two areas in south Thornton, the property around the 88th Avenue station and the 104th station has become desired locations to develop. City Council approved the master plans for the land around these stops in January 2015. These stations have spurred the interest of developers who are proposing a variety of housing and commercial products for these areas. The city strongly supported a 64-unit affordable senior living facility adjacent to the 104th

station and will soon see an addition of 142 units of multifamily apartments completing this multigenerational community.

Concentration of Low to Moderate Income Families



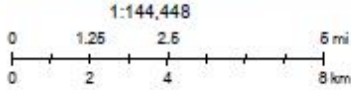
Concentration of Hispanic/Latinx Population



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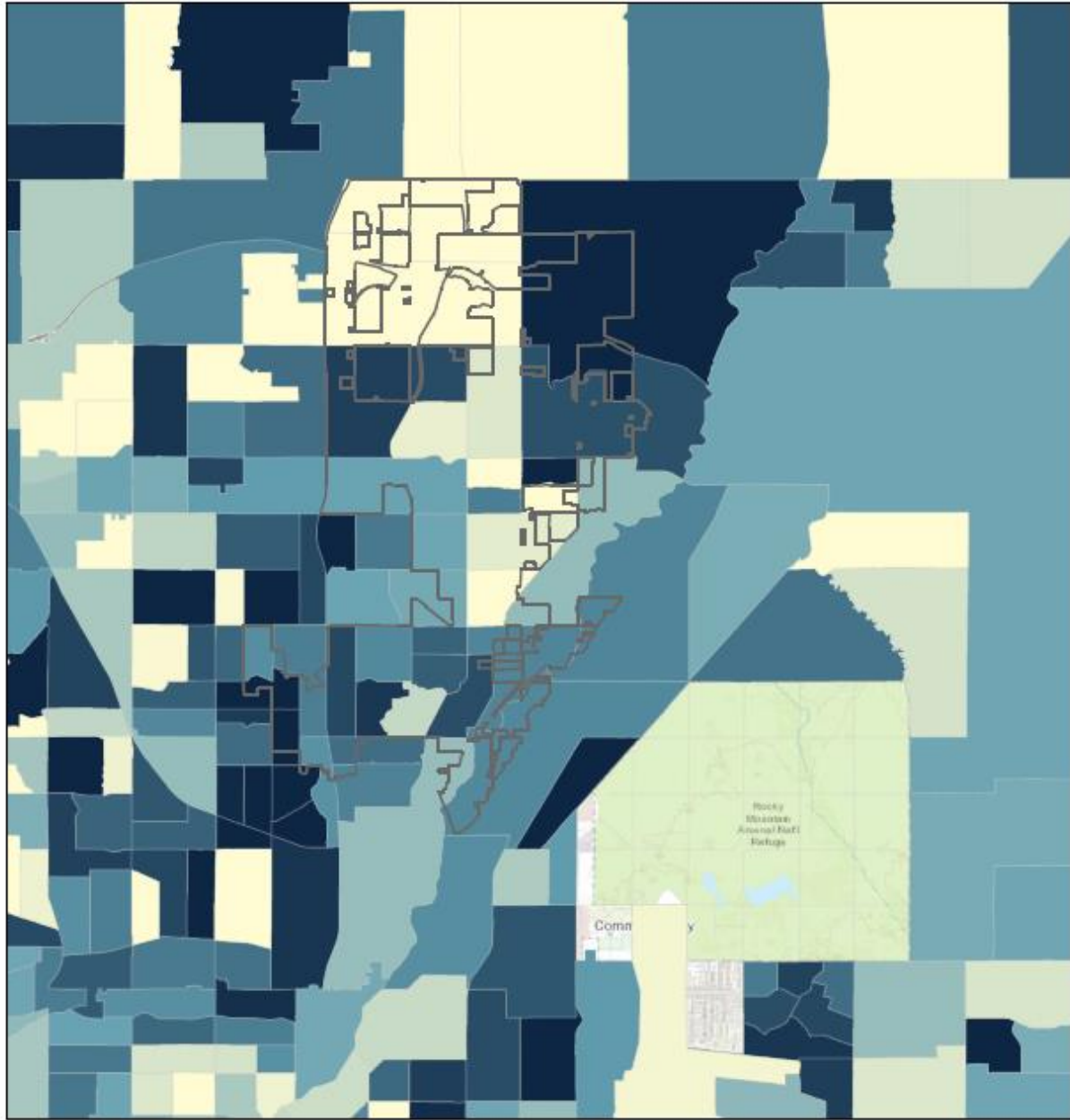
Race and Hispanic Origin - Tract

- Non-Hispanic White Population
- Hispanic or Latino Population
- Black or African American Population
- 0 - 13
- 13 - 97
- 97 - 100
- City Boundary



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

Housing Cost-Burdened Households



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Housing Costs - Tract

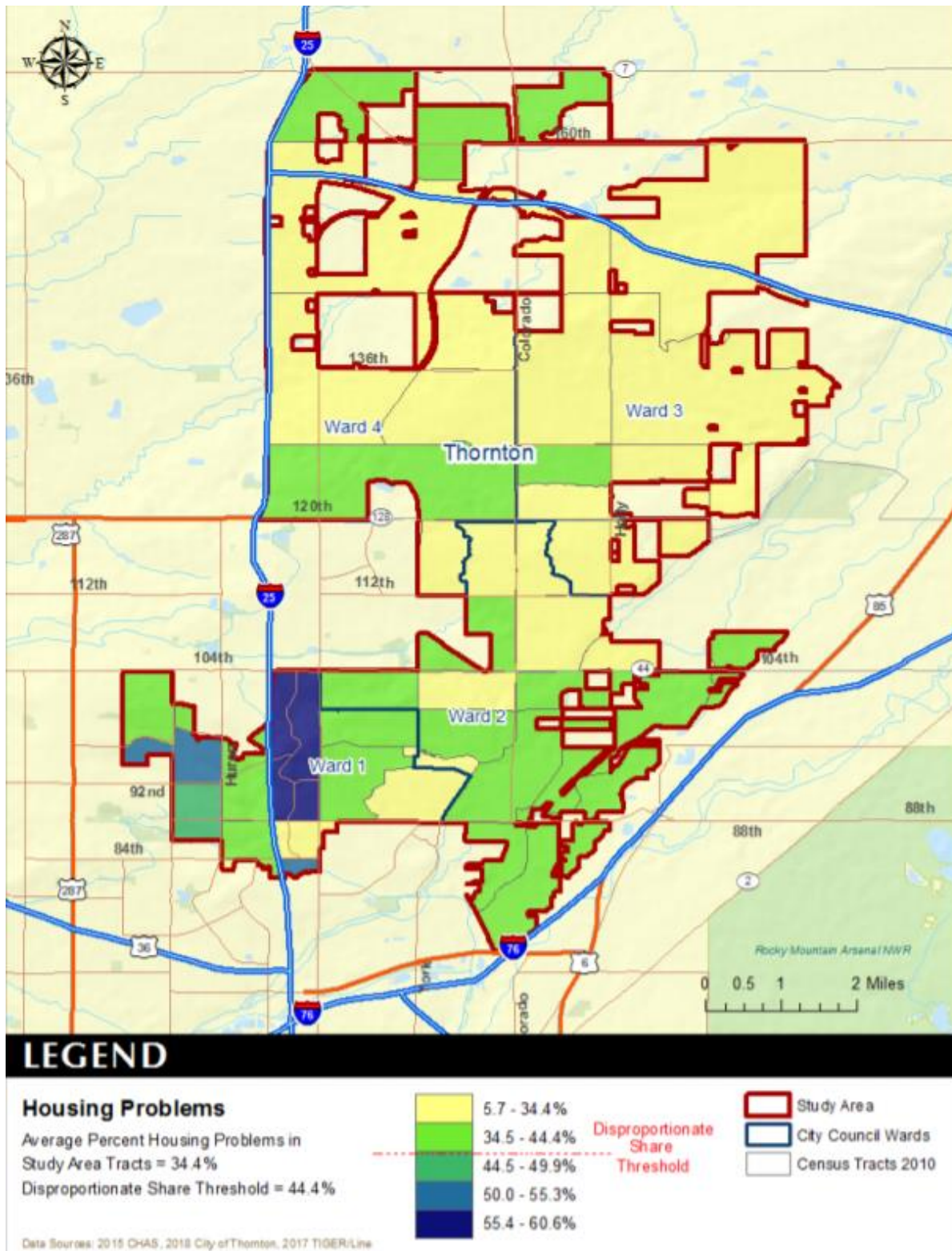
100
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City Boundary

1:144,448

0 1.25 2.5 5 mi
0 2 4 8 km

Concentration of Housing Problems



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

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

Thornton will comply with the December 26, 2016 Final Rule for Broadband Infrastructure in HUD-Funded New Construction and Substantial Rehabilitation of Multifamily Rental Housing. Thornton will do so by requiring developers of multi-family housing assisted with CDBG and/or HOME funding to comply with the telecommunications installation standards. This requirement will be implemented and enforced through funding agreements.

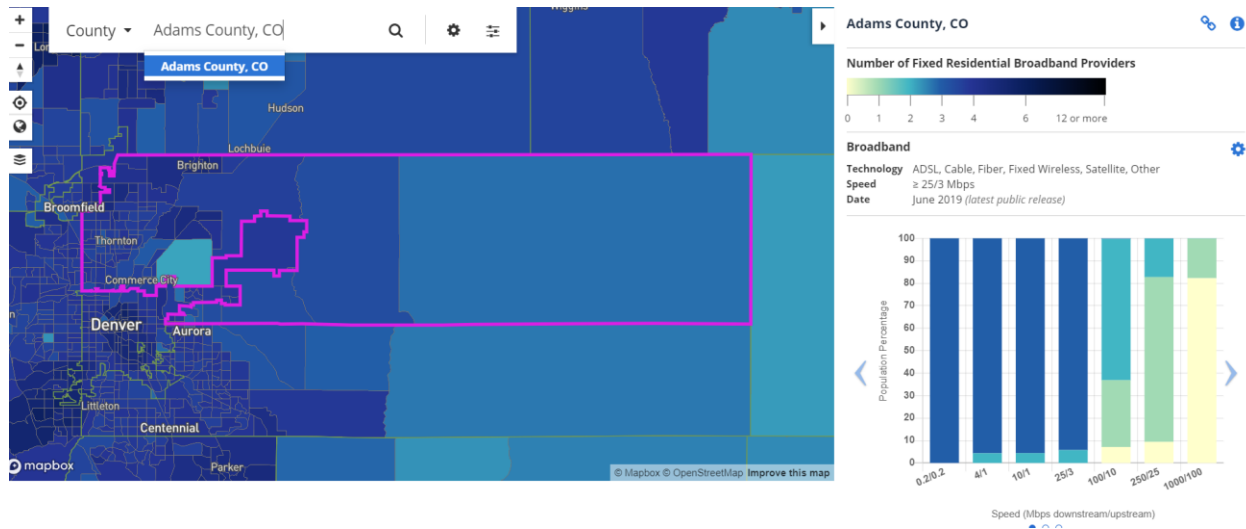
Thornton recently partnered with the local housing authority, Maiker Housing Partners, to provide CDBG, HOME and other local funding incentives to develop 64 units of new senior affordable housing. Each unit is equipped with hardwired cabling that is ready for residents to connect to their choice of internet, including broadband, and high-speed WIFI is available in public/common areas. This senior development was the first phase of a multigenerational community and Thornton will partner with Maiker Housing Partners on the second phase which will include 142 affordable multifamily units which will also be equipped with broadband infrastructure.

Additionally, Thornton regularly partners with Audio Information Network of Colorado to provide discounted mobile hot spots, cable, and small cell broadband infrastructure to Thornton residents with disabilities. Since 2016, this partnership has provided broadband access to approximately 25 Thornton residents.

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

Data from the Federal Communication Commission (FCC) reports that 95.7% of Thornton residents are served by three or more broadband internet service providers. Further, FCC data indicates that areas of south Thornton, which contains the majority of Thornton's low to moderate income census tracts, have as many as eight service providers.

Adams County Broadband Access



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

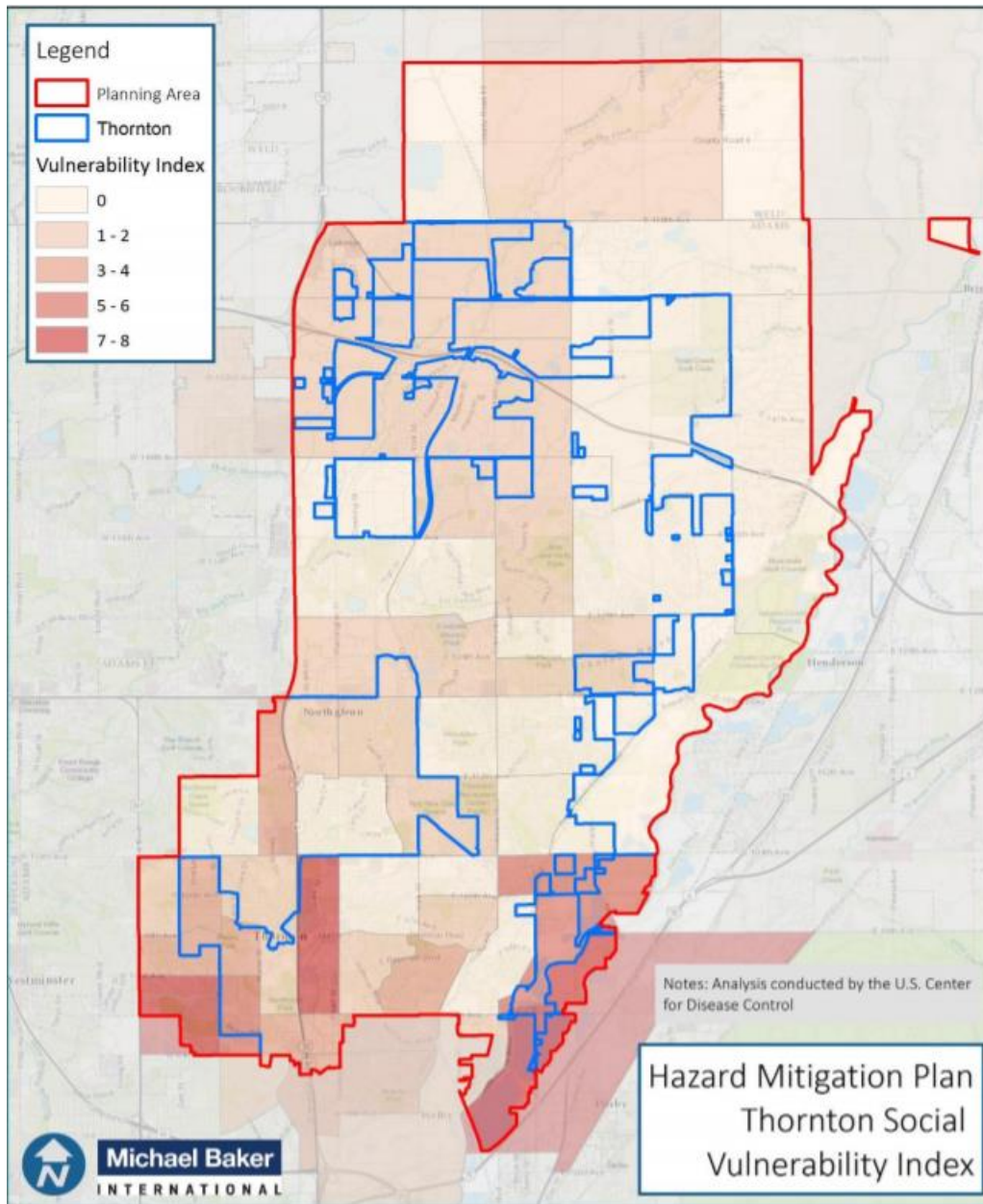
Describe the jurisdiction's increased natural hazard risks associated with climate change.

In 2017, Thornton, Federal Heights, and Northglenn Natural Hazard Mitigation Plan was developed in close cooperation with a great variety of stakeholders including many local organizations, government agencies, service providers, and businesses. The planning process was also actively promoted to the public in many ways and included public input. This plan identifies five natural hazards that are most at risk of an increase due to climate change: Drought, Flooding, Winter Storms, Wildland Fires, and Extreme Heat.

The most significant drought impacts in Colorado are related to water-intensive activities including agriculture, municipal use, wildfire protections, recreation, wildlife preservation, commerce, and tourism. In addition to increasing drought potential, climate change has the potential to intensify rain events and storms in the Colorado region. These events can lead to increased infrastructure damage, injury, illness, and death. The impacts extreme winter storms have the potential to affect infrastructure, public safety, and the local economy in a diversity of (potentially) negative ways including higher levels of precipitation per storm event as well as soil instability due to drought. Land use, vegetation, available fuels, and weather conditions (including wind, low humidity, and lack of precipitation) are chief factors in determining the number of fires and acreage burned in Colorado each year. Generally, fires are more likely when vegetation is dry from a winter with little snow and/or a spring and summer with sparse rainfall. For these reasons, climate change in Colorado (specifically, a pattern of extended drought conditions) had contributed to increased concern about wildfire in Thornton. Finally, data supports a shift towards a warmer climate with an increase in extreme high temperatures across the state of Colorado. The probability of continued, and more frequent, extreme heat events across Colorado is supported by the clear upward trend in high temperatures since 1895.

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

Thornton is characterized by a mix of low to medium-high levels of social vulnerability. The southwestern area of the city has higher levels of social vulnerability than the rest of the community. The southeast corner of the community shows high social vulnerability; however, this area has very little if any residents as it is comprised mostly of gravel pits. A closer look at the individual social vulnerability indicators within Thornton will give local emergency managers, planners, and stakeholders an even clearer picture of where resources should be prioritized in order to reduce vulnerability in the community. Over time, Thornton should continue to monitor their social vulnerability as demographic, economic, and housing related conditions change. The map below shows the areas of Thornton where populations are most vulnerable to the hazards of climate change. This map closely aligns with Thornton's low to moderate income and Hispanic/Latinx population maps included in MA-50.



Thornton's Vulnerability Index

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The key elements of the strategic plan are to provide low-income populations, especially those that are most vulnerable, with affordable housing options that are dispersed throughout the city and supportive services that promote self-sufficiency. The strategic plan guides the city in its efforts to identify what projects will be funded for the next five CDBG program years and what actions the city will take to meet the needs of the low-income population. These actions must be in alignment with the mission of the CDBG program: to develop a viable community by providing decent affordable housing and a suitable living environment and by expanding economic opportunities, principally for low and moderate income residents.

CDBG and HOME funds will be used to address the priority needs of Thornton over the next five years. In general, the high priority needs are concentrated in areas of affordable housing, increasing self-sufficiency and supportive services through public services, and public infrastructure. The attached table lists all of the high and low priority needs. Projects that fall into the 'high' priority need will receive preference over those in the low category. These needs are also linked to the goals and objectives outlined in the Consolidated Plan.

In order to meet the priority needs and goals identified in this document, the city will need to continue efforts to partner and collaborate with agencies that provide these key services to those most in need.

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

Geographic Area

Table 14 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the state

The city does not have any targeted areas other than the designated CDBG-eligible area in south Thornton, in which more than 51 percent of all households are low and moderate income. This is the area where most of the CDBG funds will likely be used in the next five years to ensure this older section of town has viable infrastructure and services for low-income residents and special populations. In the area of affordable housing, Thornton will seek to have more geographically dispersed projects throughout the city, since the Housing Needs Assessment concludes that there is not a variety of housing options or housing at different price points dispersed equally throughout the city and that Thornton has a notable high concentration of housing serving low-income people in south Thornton and a lack of affordable housing north of 120th Avenue. While some of the CDBG funds could be invested in affordable housing projects north of 120th, the vast amount of the funding for affordable housing will come from other sources, such as Private Activity Bonds, Low Income Housing Tax Credits and HOME funds.

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

Priority Needs

Table 15 – Priority Needs Summary

1	Priority Need Name	Affordable Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	N/A
	Associated Goals	Increase and retain affordable units Improve existing owner-occupied units Expand home ownership opportunities
	Description	Thornton plans to use CDBG and the city's allocation of HOME Consortia funds to expand affordable housing choices for its residents.
	Basis for Relative Priority	Data from the Needs Assessment and Market Analysis portions of this plan, as well as the 2019 Housing Needs Assessment and public/stakeholder input, repeatedly indicates that there is a shortage of affordable housing units for low to moderate income households and a great need for increased affordable housing choices throughout Thornton.
2	Priority Need Name	Non-Housing Community Development
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	N/A

	Associated Goals	Provide improvements to public facilities
	Description	Thornton recognizes the importance of non-housing community development in revitalizing communities and intends to use a portion of CDBG funds for eligible activities in this category.
	Basis for Relative Priority	Eligible non-housing community development projects such as parks, public facilities improvements, and neighborhood service centers are an important part of comprehensive community revitalization efforts.
3	Priority Need Name	Homeless Services
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	N/A
	Associated Goals	Provide homeless prevention and supportive service
	Description	Thornton is committed to addressing the issue of homelessness and utilizes CDBG funds to provide housing and supportive services for persons experiencing homelessness or at risk of homelessness..
	Basis for Relative Priority	Data from the Needs Assessment and Market Analysis portions of this plan, along with public and stakeholder input repeatedly indicates that there is a pressing need to address and prevent homelessness in Thornton.

4	Priority Need Name	Non-Homeless Special Needs
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence Non-housing Community Development
	Geographic Areas Affected	N/A
	Associated Goals	Provide increased public services
	Description	Support programs that serve special needs populations including: - Seniors - Individuals with Disabilities - Victims of Domestic Violence - People with Substance Abuse Issues - Abused and Neglected Children
	Basis for Relative Priority	Data from the Needs Assessment and Market Analysis portions of this plan indicate a need to address the special needs of persons with disabilities, seniors, victims of domestic violence, abused or neglected children, and people with substance abuse issues.

Narrative (Optional)

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

Introduction

Thornton will receive two major sources of funding; CDBG and HOME, from HUD that can help address the goals outlined in the Consolidated Plan. The city participates in the Adams County Consortium for the receipt of HOME funds. Since Adams County is administrator of the HOME funds and is ultimately responsible for reporting to HUD, the estimated HOME allocation is not included in the source of funds chart below.

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	786,244	0	0	786,244	0	This grant is designed to provide for the needs of low and moderate income families through the support of housing, economic development, public facility and infrastructure projects and public service programs.

Table 16 - Anticipated Resources

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

Thornton encourages sub-recipients to leverage other resources to further the impact of the funds. Thornton has partnered with Adams County and the state to appropriately utilize multiple funding sources to support affordable housing projects in Thornton. Thornton expects the leveraging of funding and partnerships to continue as a means to provide a viable community for low-income residents.

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

To satisfy the public facility priority need and goals of this plan, Thornton will repurpose the former Active Adult Center to create a neighborhood service center. This center will house the Community Connections Division and will provide several public service activities such as resource referral and intake, financial literacy course, homeowner/homebuyer workshops, etc. At this time, the city has not identified any publicly owned land to use in order to address the housing needs identified in the Consolidated Plan.

Discussion

Thornton will continue to utilize our anticipated resources to meet the needs of our most vulnerable residents. All public facility improvements will take place in areas where our low to moderate-income populations reside. For large projects, Thornton will look toward private and/or local funds to leverage our CDBG funds to maximize the resources available. Since the COVID-19 pandemic has effected Thornton's most vulnerable populations the hardest, CDBG funds, particularly funds allocated to public service activities, will continue to be needed to address many of the issues faced as a result of the public health crisis.

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

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Thornton	Government	Homelessness Non-homeless special needs Planning neighborhood improvements public facilities	Jurisdiction
Adams County	Government	Homelessness Planning	Region
Maiker Housing Partners (Adams County Housing Authority)	PHA	Ownership Public Housing Rental	Region
Brothers Redevelopment, Inc.	Subrecipient	Ownership	Region
Almost Home, Inc.	Subrecipient	Homelessness	Region
Intervention		Homelessness Non-homeless special needs public services	Region
Community Resources and Housing Development	CHDO	Ownership	Region
Metro Denver Homeless Initiative	Other	Homelessness Planning	
Cold Weather Care	Community/Faith-based organization	Homelessness	Region
GRID Alternatives Colorado	Subrecipient	Ownership	Region

Table 17 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

One of Thornton's strengths lies in its work to collaborate with adjacent jurisdictions, local nonprofits, and housing organizations in an effort to provide viable living environments for low-income populations, deal with blighted conditions, and handle emergency situations. The unique structure of Community Connections, as the city's CDBG administrator, is also a strength of the institutional delivery system. Staff serve as subject matter experts in the realms of housing, grants, health equity, education and supportive services, and routinely consult and collaborate with several community entities to carry out its mission.

The primary gap in the institutional structure is the lack of knowledge that nonprofit staff members have with organization development, fundraising, and understanding how to use government grants. City staff have been hosting training sessions and answering questions for local nonprofit organizations for the last several years on the Thornton Assistance Funds, CDBG, and other funding. Still, the organizations make requests for ineligible expenses, fail to provide the necessary documentation, or have financial issues. There appears to be much turn over in the staff at nonprofit organizations, so city staff spends a good portion of their time training new nonprofit staff on a regular basis. This can be detrimental to CDBG funding, when staff change after funding has been awarded or mid-way through a project.

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

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

Supportive Services			
HIV/AIDS	X		
Life Skills	X		
Mental Health Counseling	X	X	
Transportation	X		

Table 18 - Homeless Prevention Services Summary

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

Community Connections works with organizations that serve persons experiencing homelessness or persons that are at-risk of becoming homeless. The Colorado Coalition for the Homeless, Cold Weather Care, Access Housing, Growing Home, Almost Home, and Adams County Housing Authority (DBA Maiker Housing Partners) serve people who are homeless or close to being homeless in Adams County. In many cases, these agencies are funded through Thornton's allocation of CDBG funds and Thornton Assistance Funds. These agencies have caseworkers that assist their clients with finding and accessing childcare services, health services, transportation, GED classes and job skill training. The city provides contact information for these homeless service providers as well as other organizations that help people with their basic needs through the website, marketing materials, and through face-to-face and phone interactions with those in need of service. The online list of resources includes agencies that provide food; housing; utility assistance; health care; help for homebound, and assistance in a mental health crisis.

The Colorado Department of Public Health and Environment estimated that between 1982 and 2017, there were 1,536 newly diagnosed persons living with HIV/AIDS in Adams County, representing less than .01% of the total population in the county. These numbers are not broken down by city. These residents can access services through the Colorado AIDS project. Additionally, the majority of organizations that provide the general services do so by collaborating to ensure that all persons (HIV/AIDS or homeless), regardless of age, race, or ethnicity, have access to their services. Clinica Family Health Services does conduct testing for HIV/AIDS; since it does not have the capacity to address more comprehensive needs, Clinica refers residents to the Colorado AIDS project.

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

The strength of the system to assist homeless individuals is that there are a variety of agencies established to address the needs of the homeless and special populations and they are seeking ways to improve services to their clients. Also, the housing service providers work together to prevent homelessness, address those that need immediate shelter and those that need assistance over a longer period to attain self-sufficiency. The Colorado Coalition for the Homeless, Cold Weather Care, Access Housing, Growing Home, Almost Home, and Adams County Housing Authority serve people who are

homeless or close to being homeless in Adams County. When these agencies discover a gap in services, they get together to discuss the issue and attempt to develop a solution.

One of the gaps in the system is the lack of a centralized system that would allow agencies to quickly know if a person has already received or has been referred for a particular service. When data was compared among two of the agencies, the agencies found that 40% of their clients were receiving services from both agencies. Adams County homelessness outreach staff will soon begin using the Homeless Management Information System (HMIS) , which will eliminate duplicative data, streamline access and increase data quality and timeliness. This has the potential to decrease the number of residents who go from agency to agency requesting the same services. Also, it will allow a service provider to ensure a person is not receiving the same information repeatedly and identify the most appropriate resources for the person.

Feedback from service providers for homeless and special needs populations was that transportation was one of the biggest challenges these populations face and yet the amount of transportation vouchers are limited. The demand for these types of services seem to outweigh what is available or may need to be restructured to better address the needs of these communities.

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

Overcoming the gaps in the institutional structure and service delivery system must be done in collaboration with other funders and through partnerships. Overcoming these gaps was also a primary reason Thornton created the Community Connections Division to serve as the one-stop resource shop for residents to navigate service delivery. Community Connections staff work with several collaborative organizations to form partnerships with service providers and increase the level of service for our residents. Often times, these efforts introduce service providers with other service providers that can partner or assist each other. For example, one collaborative effort Thornton is highly involved with is the Adams County Coalition for the Homeless. This group identified a large gap in service delivery and worked to launch a severe weather activation plan to provide emergency shelter to residents experiencing homelessness. The coalition brought together three separate service providers to work collaboratively to quickly stand up this new program and several municipalities provided navigation to residents experiencing homelessness.

With access to public transit remaining as a service gap, Thornton is working the regional Transportation District to get the word out about the commuter rail and re-route buses so that people can take public transportation to and from work, school, and all their needed services.

Finally, Thornton will continue to provide technical assistance to agencies funded through CDBG with the goal of helping them to increase their capacity and operate their business more efficiently. Since these agencies serve all residents of the county, the city will support the county in their efforts to

increase the capacity of local nonprofits who are struggling to provide the same or increased levels of service to their clients.

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

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Increase and retain affordable units	2020	2024	Affordable Housing	N/A	Affordable Housing	CDBG: \$1,000,000	Rental units constructed: 200 Household Housing Unit Rental units rehabilitated: 50 Household Housing Unit
2	Improve existing owner-occupied units	2020	2024	Affordable Housing	N/A	Affordable Housing	CDBG: \$500,000	Homeowner Housing Rehabilitated: 100 Household Housing Unit
3	Expand home ownership opportunities	2020	2024	Affordable Housing	N/A	Affordable Housing	CDBG: \$500,000	Homeowner Housing Added: 20 Household Housing Unit
4	Provide homeless prevention and supportive service	2020	2024	Homeless	N/A	Homeless Services	CDBG: \$294,841	Homelessness Prevention: 250 Persons Assisted
5	Provide improvements to public facilities	2020	2024	Non-Housing Community Development	N/A	Non-Housing Community Development	CDBG: \$1,155,293	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 15000 Persons Assisted
6	Provide increased public services	2020	2024	Non-Homeless Special Needs	N/A	Non-Homeless Special Needs	CDBG: \$294,842	Public service activities other than Low/Moderate Income Housing Benefit: 350 Persons Assisted

Table 19 – Goals Summary

Goal Descriptions

1	Goal Name	Increase and retain affordable units
	Goal Description	Thornton plans to increase the number of affordable rental and owner-occupied units and rehabilitate existing units.
2	Goal Name	Improve existing owner-occupied units
	Goal Description	Thornton assists owner-occupants of single-family homes through its Help for Homes repair program, which also includes accessibility improvements for Thornton's aging population.
3	Goal Name	Expand home ownership opportunities
	Goal Description	Thornton plans to expand opportunities for homeownership, deconcentrate poverty and expand housing choice.
4	Goal Name	Provide homeless prevention and supportive service
	Goal Description	Through collaborations with partner housing and homelessness service providers, Thornton provides emergency rent/mortgage and utility assistance and other supportive services to extremely low and low-income households to prevent homelessness.
5	Goal Name	Provide improvements to public facilities
	Goal Description	Thornton supports renovations and/or improvements for city-owned parks, community centers, neighborhood service centers, nonprofits, and other eligible public facilities and infrastructure such as sidewalks and flood and drainage protection.
6	Goal Name	Provide increased public services
	Goal Description	Expand and increase public services for low and moderate-income residents and supportive services that address basic needs, increase self-sufficiency or educate residents.

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

Through new construction and rehabilitation of multifamily properties, improving existing owner-occupied units, and expanding affordable homeownership, it is estimated that roughly 370 low to moderate-income households will be provided affordable housing.

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

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

The city supports programs aimed at educating, preventing and addressing lead-based paint hazards, some of which are subject to the Lead-Safe Housing Rule Requirements identified in 24 CFR Part 35. To ensure the safety of the residents, the nonprofit housing agencies that will receive CDBG-funding will be expected to properly evaluate and remediate lead-based paint hazards.

The contractor(s) for home repair programs funded with CDBG will be expected to test for lead-based paint if the work will disrupt an area that might have lead-based paint. The contractor will be expected to mitigate lead-based paint, if needed. The current contractor provides residents with pamphlets in English or Spanish to explain the potential hazards of lead-based paint.

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

Thornton's policies for the home repair programs require that the contractor identify whether or not lead-based paint could be present based on the scope of work and age of housing. In the event hazards are found, the policy states that the contractor will take the appropriate action to address the lead-based paint hazards as required by federal regulations based on the amount of funding provided to the home. Residents who live in homes must also be notified.

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

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

There were an estimated 10,570 persons living in poverty in 2016, some 375 of which were elderly and 1,367 were children under the age of six.

Poverty is the lack of food, shelter and other basic necessities for a maintaining quality of life. Homelessness is considered extreme poverty. The factors that have been tied to poverty are lack of financial resources due to lower educational attainment or having a job that only pays minimum wage. Other costs may also contribute such as high cost health issues, housing or childcare needs. The city's strategy to reduce poverty is to ameliorate these factors through ensuring services exist to help these people become self-sufficient. The city does not administer social service programs nor receive funding for human service programs. Therefore, the city's efforts center on partnering with multiple organizations that do or might be able to address the underlying causes of poverty and support programs and services that help people to survive in the short term and move up the economic ladder over the long term.

Education, training and employment opportunities are important components of breaking the cycle of poverty. The city will seek ways to support employment training and workforce development to low-income residents, which is a high priority need identified in this plan. In addition, the city will continue to host homebuyer and foreclosure prevention workshops, which help people set goals and gain control of their finances so they are eligible for homeownership. Setting up a solid financial structure is one of the requirements of the home repair loan program as well. HUD-certified housing counselors will work with people prior to taking on the zero interest loan to help them understand what amount of loan they can and cannot afford. The city will explore other options to increase residents' financial knowledge.

The city supports and strengthens local businesses through Economic Development grants, incentives and small business services. Community Connections will inform Section 3 businesses about contracting, training and employment opportunities on construction projects. The purpose of Section 3 is to provide employment and economic opportunities to low-income individuals and businesses.

The city will encourage agencies to seek ways to provide stability for low-income individuals and families and develop ways to move people from dependency. The city's grant recommendation committee will thoroughly assess the requests for Thornton Assistance Funds from nonprofit service providers to determine which agencies not only assist with basic needs, but also provide ways to help people achieve self-sufficiency or inspire residents to take action to get ahead. This could be in the form of sliding fee scales for health care or placing solar panels on the homes of low-income residents in exchange for sweat equity from the homeowner.

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

Providing a safe, stable home environment is critical for low to moderate income people to gain the skills to move out of poverty and achieve self-sufficiency. As Maslow's hierarchy of needs states, one's basic needs need to be met before he or she can grow in other areas. The city will encourage housing developers to build affordable housing that are adjacent to child care facilities, transit centers, grocery, retail, and employment opportunities. The city will look for other, unique ways to establish stability and a sense of safety for those in the community.

SP-80 Monitoring - 91.230

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

To ensure long-term compliance with the requirements, the city has developed a comprehensive monitoring plan for all projects and activities receiving CDBG funds, including any internally administered activities. This information is incorporated into the city's policies and procedures for the CDBG program. The primary objective is to ensure that federal funds received are used only for approved activities and are administered in accordance with all applicable city, state and federal requirements. The amount of monitoring will vary dependent on the sub-recipient's previous CDBG experience, performance and the complexity of the project. The monitoring process incorporates a variety of techniques and tools into a coordinated effort to help ensure that all funded activities receive an appropriate level of review.

Individual Project Monitoring: This is the primary technique used as it has shown to have the most impact on deterring potential issues and assuring compliance. Because the applicable regulations and sub-recipients experience using CDBG can vary widely, city staff provide ongoing technical assistance and a comprehensive review of projects throughout the life of the project.

Desktop Monitoring: This monitoring technique provides staff with an effective tool for examining ongoing project activities. Some of the items reviewed through this process include quarterly reports, financial audits and project completion reports. The information helps determine if the agency is on track with accomplishments and expenditures and identifies the need for additional technical assistance or future on-site visits.

On-Site Visits: The city conducts on-site monitoring of new sub-recipients that received funds in the past year. This is a comprehensive review of programmatic and financial records to ensure all required documentation is maintained and address any issues with the program or agency that may impact compliance with regulations. Certain situations warrant an additional on-site visit with the sub-recipient to discuss issues, such as if an agency is encountering project implementation issues, or the other monitoring conducted has identified a potential issue.

Specific Regulation Compliance (i.e. Davis-Bacon, Section 3 and Minority/Women Owned Business): Projects requiring compliance with any of these specific regulations will be provided with additional technical assistance and monitoring. City staff will attend the pre-bid and pre-construction meeting to provide a general overview of the requirements and answer questions. Once a contract is awarded, staff will work with the contractor and sub-recipient to thoroughly explain the requirements, obtain the necessary paperwork and assure payment of prevailing wages through payroll review and on-site interviews.

Drawdown Requests: The validity of expenditures is verified through the review of reimbursement requests. The request must clearly describe the expenditure and is reviewed for eligibility, consistency with approved project expenses, verification of remaining balance, proof of expense and of payment and compliance with the scope of work.

City Specific: Thornton has several overarching measures in place to ensure compliance with city, state and federal regulations for all city projects, regardless of the funding source. These measures include the annual external audit of the Finance Department which includes OMB Circular A-133 compliance and the Purchasing/Contract Administration Manual under which the Contracts & Purchasing department operates.

Expected Resources

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

Introduction

Thornton will receive two major sources of funding; CDBG and HOME, from HUD that can help address the goals outlined in the Consolidated Plan. The city participates in the Adams County Consortium for the receipt of HOME funds. Since Adams County is administrator of the HOME funds and is ultimately responsible for reporting to HUD, the estimated HOME allocation is not included in the source of funds chart below.

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	786,244	0	0	786,244	0	This grant is designed to provide for the needs of low and moderate income families through the support of housing, economic development, public facility and infrastructure projects and public service programs.

Table 20 - Expected Resources – Priority Table

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

Thornton encourages sub-recipients to leverage other resources to further the impact of the funds. Thornton has partnered with Adams County and the state to appropriately utilize multiple funding sources to support affordable housing projects in Thornton. Thornton expects the leveraging of funding and partnerships to continue as a means to provide a viable community for low-income residents.

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

To satisfy the public facility priority need and goals of this plan, Thornton will repurpose the former Active Adult Center to create a neighborhood service center. This center will house the Community Connections Division and will provide several public service activities such as resource referral and intake, financial literacy course, homeowner/homebuyer workshops, etc. At this time, the city has not identified any publicly owned land to use in order to address the housing needs identified in the Consolidated Plan.

Discussion

Thornton will continue to utilize our anticipated resources to meet the needs of our most vulnerable residents. All public facility improvements will take place in areas where our low to moderate-income populations reside. For large projects, Thornton will look toward private and/or local funds to leverage our CDBG funds to maximize the resources available. Since the COVID-19 pandemic has effected Thornton's most vulnerable populations the hardest, CDBG funds, particularly funds allocated to public service activities, will continue to be needed to address many of the issues faced as a result of the public health crisis.

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	Improve existing owner-occupied units	2020	2024	Affordable Housing	N/A	Affordable Housing	CDBG: \$100,000	Homeowner Housing Rehabilitated: 20 Household Housing Unit
2	Provide improvements to public facilities	2020	2024	Non-Housing Community Development	N/A	Non-Housing Community Development	CDBG: \$181,344	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 18000 Households Assisted
3	Provide homeless prevention and supportive service	2020	2024	Homeless	N/A	Homeless Services	CDBG: \$130,000	Homelessness Prevention: 60 Persons Assisted
4	Increase and retain affordable units	2020	2024	Affordable Housing	N/A	Affordable Housing	CDBG: \$200,000	Rental units constructed: 142 Household Housing Unit
5	Provide increased public services	2020	2024	Non-Homeless Special Needs	N/A	Non-Homeless Special Needs	CDBG: \$5,900	Public service activities other than Low/Moderate Income Housing Benefit: 200 Persons Assisted

Table 21 – Goals Summary

Goal Descriptions

1	Goal Name	Improve existing owner-occupied units
	Goal Description	This goal will be met by improving existing owner-occupied units through the Help for Homes minor home repair program.
2	Goal Name	Provide improvements to public facilities
	Goal Description	This goal will be met through two activities: 1. The purchase of land and design costs of installing new ADA accessible sidewalks in a low-income area of the city. 2. The rehabilitation of a neighborhood service center in a low income area of the city, which will provide resources, workshops, and training primarily to low to moderate income residents.
3	Goal Name	Provide homeless prevention and supportive service
	Goal Description	This goal will be met by partnering with local service providers to prevent homelessness by providing emergency rent/mortgage and utility assistance to residents.
4	Goal Name	Increase and retain affordable units
	Goal Description	This goal will be met by partnering with the local housing authority, Maiker Housing Partners, to construct 164 units of affordable rental housing.
5	Goal Name	Provide increased public services
	Goal Description	This goal will be met by partnering with Intervention, Inc. on an innovative domestic violence prevention and anti-recidivism program.

AP-35 Projects - 91.420, 91.220(d)

Introduction

In 2020, a portion of the CDBG allocation will be used to support the administration of the program. The remainder of the grant will fund projects that benefit the low to moderate-income community and meet a priority need. Thornton intends to include the following projects in the AAP to meet the needs of the low to moderate community:

Housing Activities:

Thornton will continue to fund the home repair program, Help for Homes, which includes the free minor home repair program for low to moderate income homeowners that improve health, safety and accessibility. The goal of the home repair program is to enable low to moderate-income individuals the opportunity to stay in their home while ensuring their basic needs are met.

Public Facilities:

Thornton will partner with Maiker Housing Partners on phase two of their intergenerational community, Crossing Pointe South. CDBG funding will be used to offset infrastructure costs in order to develop 142 units of affordable housing.

Thornton will create a new neighborhood service center in a low to moderate income census tract to provide resources, workshops, and educational opportunities to low income residents.

Thornton will also purchase land and design an ADA accessible sidewalk in a low to moderate-income census tract.

Public Service Activities:

\$130,000 will fund emergency rent, mortgage, and utility assistance to individuals at-risk of being evicted or losing their Thornton home. This activity will be administered by Maiker Housing Partners and Almost Home.

\$5,900 will be used for an innovative domestic violence prevention and anti-recidivism program administered by Intervention, Inc.

If any of the 2020 projects are not able to start by the required timeframe or have unused or remaining funds after they commence or are completed, Thornton has the option to re-assign funds to any of the other existing, approved 2020 projects, including any reserve projects if applicable. Some of the reasons a project may not be able to start include changes in the original scope of the project, an inability to meet the timing requirements for spending funds, an inability to adequately report outcomes, an

inability to meet contract requirements, or the failure to meet or abide by federal regulations.

#	Project Name
1	CDBG Project Administration
2	Housing Improvement Programs
3	Public Facility Improvements
4	Public Service Programs

Table 22 – Project Information

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

Thornton’s 2019 Housing Needs Assessment indicated that 32% of the Thornton homeowners are cost burdened and 51% the renters in Thornton are cost burdened. These statistics indicate a short-term need for immediate housing assistance and a long-term need in the community for more affordable housing. The emergency rent/mortgage assistance program is intended to keep people who are housing cost burdened in their current home when they experience an unexpected financial situation and provide residents with an opportunity to receive personal housing counseling.

The two public facility projects will benefit the most amount of low to moderate-income Thornton residents. The rehabilitation of the former Active Adult Center will create a new neighborhood service center for low to moderate-income residents to apply for public services and attend workshops and trainings. The other project will purchase land and fund design costs for the installation of an ADA accessible sidewalk adjacent to one of the city's largest mobile home communities.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG Project Administration
	Target Area	N/A
	Goals Supported	N/A
	Needs Addressed	N/A
	Funding	\$20,000
	Description	The City will use CDBG funds to carry out activities associated with program administration and management of the CDBG program.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	N/A
	Planned Activities	N/A
2	Project Name	Housing Improvement Programs
	Target Area	N/A
	Goals Supported	Improve existing owner-occupied units
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$100,000

	Description	These housing improvement programs are designed to carry out the priority housing needs identified in the 2020-2024 Consolidated Plan. The projects and/or activities may include the support of housing construction, direct home ownership assistance, single-family rehabilitation, multifamily rehabilitation, energy efficiency improvements and acquisition for rehabilitation.
	Target Date	6/30/21
	Estimate the number and type of families that will benefit from the proposed activities	20
	Location Description	All households served will be within the city limits
	Planned Activities	Help for Homes minor home repair program
3	Project Name	Public Facility Improvements
	Target Area	N/A
	Goals Supported	Provide improvements to public facilities
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$530,344
	Description	The public facilities projects are designed to carry out the priority public service needs identified in the 2020-2024 Consolidated Plan. Projects support low- and moderate-income families or improve low to moderate-income eligible areas. Improvements may include the acquisition, construction or rehabilitation of a neighborhood service center, community centers, facilities serving individuals with disabilities, homeless facilities, infrastructure in support of affordable housing developments, or upgrades to drainage, sidewalks and water lines.
	Target Date	6/30/21
	Estimate the number and type of families that will benefit from the proposed activities	16,000 individuals will be served through the rehabilitation of a neighborhood service center and the installation of new sidewalks 142 households will be serviced through public utilities in support of affordable housing.

	Location Description	All individual and household beneficiaries will be within the city limits.
	Planned Activities	Rehabilitation of a neighborhood service center Installation of public utilities in support of affordable housing Installation of new ADA accessible sidewalks.
4	Project Name	Public Service Programs
	Target Area	N/A
	Goals Supported	Provide increased public services
	Needs Addressed	Homeless Services Non-Homeless Special Needs
	Funding	CDBG: \$135,900
	Description	The public service projects are designed to carry out the priority public service needs identified in the 2020-2024 Consolidated Plan. The projects may include employment training, transportation services, health services, services for specific populations (i.e. seniors, people with disabilities, survivors of domestic violence, people with substance abuse issues, abused and neglected children, homeless and near-homeless), services for youth or childcare, screening for lead-based paint, legal services, crime awareness or prevention or housing and rental assistance counseling.
	Target Date	6/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	110
	Location Description	All beneficiaries will reside within the city limits
	Planned Activities	Homelessness prevention through emergency rent and utility assistance. Domestic violence prevention

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

While Thornton does not have any specific geographic target areas identified in the Consolidated Plan to direct assistance, Thornton has identified the boundaries of the CDBG-eligible area that encompasses neighborhoods south of 104th. This section of the city is comprised of neighborhoods that have a higher concentration of low-income individuals. In addition, there is a higher concentration of Hispanic individuals in the southern section of Thornton than in other areas of the city. Some of the southern tracts consist of more than 50% Hispanic population according American Community Survey data. As indicated by the maps found in the MA-50 Needs and Market Analysis Discussion section, the areas with the largest percentage of Hispanic individuals coincides with the areas that have the highest proportion of families living at or below poverty.

Rationale for the priorities for allocating investments geographically

As discussed above, although the city is not taking concerted efforts to target resources in a specific area, it is likely that a majority of the funds will benefit individuals in the CDBG-eligible areas.

Discussion

In addition to the information provided by the Census, Thornton has worked on other studies and plans that provide detailed information on the needs of the community as a whole. All studies indicate that the areas in the south show the most need for reinvestment; CDBG funds will likely benefit those same areas. However, the Housing Needs Assessment suggests that there is a need to disperse affordable housing throughout the city so opportunities to support projects that are in the middle and northern sections of the city will be evaluated, as well as affordable housing projects close to the future commuter rail stops that meet Thornton's affordable housing policy goals.

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

Introduction

As described in this Plan and Projects section, there are a variety of obstacles to meeting underserved needs in the city. These include a growing need for services as the community expands, a lack of education of available resources within the community, competition for federal and state funds, availability of accessible and affordable housing, the increased cost of housing, gaps in affordability of owner-occupied and rental housing for populations at specific income levels, concentrated areas of affordable housing, and increased compliance and technical skills required for administering the funds.

Actions planned to address obstacles to meeting underserved needs

The city is will take the following actions to in order to meet the needs of the underserved population.

- Actively pursue increasing the amount of new affordable housing or work to replace any loss of affordable units in the private market. Historically, the city has allocated CDBG funds to affordable housing projects, which were also leveraging state and county funds and assigned Private Activity Bonds for future affordable housing projects. The city has provided letters of support for quality affordable housing projects being considered for Low Income Housing Tax Credits.
- Participate in regional meetings to learn about changes to existing services and new programs available to residents, specifically programs to prevent homelessness.
- Thornton posts information on the city website that people can access 24 hours a day, seven days a week. There is contact information for social service providers and community organizations, such as food banks, health providers, and agencies that assist with substance abuse, transportation, water assistance, or housing.
- Thornton will continue to offer resources for residents who speak Spanish as their primary language.
- Thornton will continue to host free educational workshops and events throughout the year focusing on energy efficiency, first time homebuyer workshops, and senior services. In addition, staff will attend community meetings to provide resources to low-income and special needs populations.

Actions planned to foster and maintain affordable housing

Thornton will support the development and preservation of affordable housing by awarding CDBG funds.

In addition, Thornton will continue to support opportunities for low to moderate-income people to become first time homeowners. These strategies include promoting down payment and closing cost assistance programs offered by the Colorado Housing and Finance Authority and the Metro Mortgage

Assistance Plus Program, which provides a down payment grant equal to 4% of the mortgage amount.

Actions planned to reduce lead-based paint hazards

Brothers' Redevelopment, the agency under contract to coordinate the rehabilitation work for Thornton's home improvement programs, complies with the Environmental Protection Agency (EPA) regulations for lead-based paint and has specific actions they follow or require their contractors to follow for testing and abatement if necessary. Depending on the square footage or cost of the potential area of disturbance, different levels of mitigation are done. Homeowners are provided with EPA pamphlets in English or Spanish.

CDBG and housing staff will review the actions taken for these projects and ensure supporting documentation is in place in order to be in compliance with the Lead-Safe Housing Rule Requirements, as identified in 24 Code of Federal Regulations Part 35.

Actions planned to reduce the number of poverty-level families

There were an estimated 10,570 persons living in poverty in 2016, some 375 of which were senior citizens and 1,367 were children under the age of six. In 2020 and beyond, Thornton will support agencies and initiatives aimed at reducing the number of poverty-level families through ensuring there are opportunities to increase financial knowledge before taking on home loans, aiding supportive services for those in poverty.

The ACS indicated the rate of homeowners at or below the poverty level remained constant (34%) in Thornton. This means that low-income homeowners still need assistance with how to increase their net worth and not fall into deep debt. For this reason, Thornton will continue to support down payment assistance and first time homebuyer loan programs. These programs require participants to attend homebuyer education, which is key to the long-term success of the resident maintaining homeownership.

Moving forward, Thornton will continue to explore different ways to reach out to contractors and educate them on what Section 3 means and the benefits of being a Section 3 contractor. For new construction related projects, Thornton will provide sub-recipients and contractors with information on Section 3 and will track all Section 3 businesses funded through CDBG. These will be reported via the Section 3 report that is submitted to HUD. Lastly, the city will promote training and contracting opportunities on Thornton's Section 3 webpage.

Thornton will award grants through the Thornton Assistance Funds program to aid nonprofit organizations in their efforts to help people move from relying on private or public assistance to providing for one's own needs. Thornton believes if basic needs can be met and other supportive services can be provided, it can help alleviate some of the financial strain on families and help avoid or assist with unanticipated costs such as medical visits. Without assistance, such unanticipated costs

often make it difficult for the family to maintain a budget or pay other necessary bills and can result in the loss of time worked. By supporting basic needs and other supportive services Thornton helps enable the individuals and families to continue their upward movement towards self-sufficiency and out of poverty.

Actions planned to develop institutional structure

Incorporated in 1956, Thornton is a "home-rule" city, meaning that it has its own constitution. Thornton has a nine member Council that, with the assistance of the City Manager is responsible for setting policy, making laws, and developing goals for the city. The Council acts, by majority vote, to adopt ordinances and resolutions to guide Thornton in conducting business. The City Manager carries out the policy directions of City Council, and supervises and coordinates the work of the staff in the departments that fall under direct control of the City Council. The Parks, Recreation, and Community Programs Department, which is responsible for administering the CDBG program, is one of these departments.

No visible gaps were found in the institutional delivery system. Thornton will continue to facilitate and foster relationships with agencies to strengthen public service, work with other local jurisdictions and organizations to improve the community, and participate in regional efforts that allow for information sharing and dialogue concerning affordable housing and special needs populations including those at-risk of homelessness.

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

Thornton will work with public and private housing and social service agencies to enhance coordination in the implementation of the Consolidated Plan. Some of the actions the city will take include:

- Coordinating meetings with the city and county or state if they are also contributing funds to a project in Thornton. Topics may cover how the funding requirements will be addressed so as not to overlap and identify any issues to resolve.
- Communicating with agencies to determine if there are any new needs in the community.
- Offering technical assistance to agencies to discuss the sources of funding available, associated timelines for applying for funds and most impactful uses of funds.
- Participating in regional efforts and meetings with public and private housing and social service agencies and other entitlement communities.
- Surveying manufactured home parks and multifamily apartment complexes to determine the number of units, vacancy and rental rates. The survey also requests data on the number of ADA compliant units in each multifamily housing complex.
- Offering free pre-application meetings for potential developers and/or property owners that are considering new development or rehabilitation as described under the Development of Institutional Structure section.
- Providing letters of support on behalf of affordable housing project proposals or other project

proposals from agencies that are requesting funding from external sources.

- Facilitating opportunities for agencies to collaborate to help the low-income population they serve.

Discussion

As discussed in the 2020-2024 Consolidated Plan, Community Connections uses monitoring efforts to ensure that programs funded with CDBG are compliant with federal, state and local requirements. In order to achieve this goal, the city has developed a comprehensive monitoring plan for all CDBG funded projects.

In 2020, staff will perform desk monitoring, technical assistance and on-site monitoring both pre and post award. The amount of monitoring will vary dependent on the sub-recipient's previous CDBG experience, performance and the complexity of the project. In addition, the city ensures compliance during setup, update and closeout of activity information in IDIS. IDIS tracks drawdown of grant funds and provides another level of monitoring to ensure program eligibility. Additionally, regularly updating IDIS helps verify that sub-recipients are on track with expenditures and outcomes. This ongoing review helps the Thornton identify needs of the sub-recipient and provide additional support if necessary.

Program Specific Requirements

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

Introduction

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.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(l)(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
Total Program Income:	0

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.	100.00%

Discussion

The city has not used CDBG funds towards a Section 108 loan, urban renewal or float funded activities. Additionally, no grant funds have been returned to the line of credit because of ineligible activities, excessive draws, or ineligible expenditures. Thornton does not anticipate receiving program

income in the 2020 program year that would meet the threshold as defined by HUD in 24 Code of Federal Regulations Part 570.500(4)(i). The regulation states that program income does not include any income received in a single program year by the recipient and all its sub-recipients if the total amount of such income does not exceed \$25,000. Therefore, no program income is anticipated in 2020.

Appendix – Housing Needs Assessment and Analysis of Impediments to Fair Housing Choice Executive Summary

SECTION I. EXECUTIVE SUMMARY

This study being undertaken in both a Housing Needs Assessment (HNA) and an Analysis of Impediments to Fair Housing Choice (AI). These two components use integrate sources to develop a set of recommendations and goals to address the housing needs in Thornton, as well as identify any impediments to fair housing choice in the city and set appropriate goals to address these impediments. The following narrative describes these two elements and the findings from this study.

A. HOUSING NEEDS ASSESSMENT

DEMOGRAPHIC AND ECONOMIC BACKGROUND

The population in Thornton has expanded at a relatively fast rate over the last 17 years, rising from 82,506 people in 2000 to 136,978 in 2017. The population in Thornton is also aging, with those aged 55 and older growing at a faster rate than the rest of the population. The racial and ethnic make-up of Thornton is shifting as well. The Hispanic population has grown by over 141 percent, or almost 25,000 people between 2000 and 2016, while the white non-Hispanic population grew by 37.7 percent. The Asian population has also grown to account for more than 5.0 percent of the population in 2017.

The labor force in Thornton has continued to grow in recent years, reaching 75,021 in 2017. Unemployment in Thornton has followed a similar pattern to the State of Colorado, falling over the past few years. By 2017, the unemployment rate in Thornton was 2.8 percent.

The poverty rate in Thornton has decreased from 9.9 percent in 2010 to 8.2 percent in 2016. There were an estimated 10,570 persons living in poverty in 2016, some 375 of which were elderly and 1,367 were children under the age of 6.

HOUSING NEEDS ASSESSMENT

The housing stock in Thornton rose 53.9 percent between 2000 and 2016, from 29,481 units in 2000 to 45,973 units in 2017. Homeownership in the area declined over the period, from 77.7 percent to 70.3 percent in 2010. Single-family units accounted for 72.1 percent of units in 2017.

Production peaked in 2001 at 2,381 units before falling to a low of 240 units in 2009. This grew again to 1,034 units in 2017. In recent years, single-family unit production has greatly outpaced multi-family units. The real value of single-family building permits increased from \$246,912 in 2011 to \$359,399 in 2017. Single-family units median values were highest in the northern part of the city in Wards 3 and 4. Rental prices were also highest in these areas.

Households that experience one or more of the housing problems are considered to have unmet housing needs, including overcrowding, incomplete plumbing or kitchen facilities, and cost burdens. The most common housing problem was cost burden, and 32.2 percent of households in 2017 had a cost burden. Renters were even more heavily impacted, with some 51.6 percent of renters were cost burdened or severely cost burdened.

The Housing Needs Survey found that there is a need for a variety of housing types in the city, that residents value close proximity to groceries and parks and trails, and there may be a continued need for senior and accessible housing in the city.

The Employer Survey found that many employees in the city do not live in the city. This seems to also be true for many residents that commute out of the city for work. The availability of housing in the city may not meet the needs of the current workforce.

CITY OF THORNTON FORECAST

By 2040, there are expected to be between 17,000 and 18,000 households below 80 percent HUD Area Median Family Income (HAMFI) that have housing problems in the city. These households are expected to experience housing cost burdens at a rate of 30 percent or more of their gross income. At least half of these at-need households are expected to be renters.

HOUSING CHALLENGES

The primary housing challenges facing Thornton, as identified in the study, fell into the following categories:

1. **Unmet housing needs for many households.** This represents existing households with a housing problem, especially those with cost burdens. Over 14,000 households had a cost burden (housing costs greater than 30 percent of household income) or severe cost burden (housing costs greater than 50 percent of household income) in 2017, representing 32.2 percent of the population. Renters are even more strongly hit, with 51.6 percent experiencing a cost burden.
2. **Increased demand for rental/multifamily housing.** The rate of renting has increased in Thornton over the past decade. Since homeownership is declining, the need for additional rental units will be necessary to accommodate rental households.
3. **Demand for both rental units and homeownership housing over the forecast horizon.** Rising housing prices, coupled with a low rental vacancy rate with high rental rates, are reflective of the growth that Thornton has already experienced. Thornton is expected to grow to over 66,000 households by 2040. Assuming the existing forecast is accurate, there are expected to be an additional 5,000 renter households and 12,000 owner households. Over 6,300 of these new households are expected to be low to moderate income households.
4. **Need for new construction.** The population is expected to rise by 17,000 households by 2040. The current rate of production is around 1,000 units per year. At this rate, the growing housing stock will be able to accommodate new residents. However, housing units must be available in a range of price points in order to accommodate all income levels and the 6,300 low to moderate income households expected by 2040.
5. **Aging population.** Thornton is experiencing an increase in the number of elderly households in the city. As this population continues to grow, it will increase the need

for renovations of existing housing stock, as well as the need for senior housing facilities with access to services.

6. **Concentrated Housing Problems.** Housing problems are concentrated in the southern part of the city, particularly in Ward 1. This is shown in Map V.14 on page 74. This presents the city with a challenge to address concentrated need, as well as an opportunity for investment.

RECOMMENDATIONS TO ADDRESS HOUSING NEEDS

These housing challenges present Thornton with the opportunity to plan for future housing needs as Thornton continues to grow. The area's expanding population and dynamic housing needs can be addressed through several strategies to promote successful growth. Through housing development in vacant properties, and encouraging low to moderate income housing, Thornton will be able to meet the housing needs of current and future residents.

Recommendation 1: Encourage Low to Moderate Income Housing

By 2040, Thornton is expected to have an additional 17,000 households. Over a third of these new residents are expected to be low to moderate income. Many of these low to moderate income households will be faced with housing problems, primarily cost burdens. Encouraging development of housing to accommodate lower income households will accommodate the influx of new residents in Thornton.

Actions:

1. Encourage affordable housing development through density bonus, fee deferments or waivers, and other forms of cost benefits to affordable housing developers.
2. Increase the density of housing in some areas, to maximize the use of existing infrastructure. Review maximum density restrictions for multifamily housing in residential zoning districts for areas that could accommodate higher density rental development
3. Seek out funding opportunities from local and state sources.
4. Target areas with higher rates of housing problems for investment, particularly areas in Ward 1.

Recommendation 2: Encourage Rental-Multifamily Housing Development

By 2040, Thornton is expected to have an additional 5,000 renter households. Many of these low to moderate income households will be faced with housing problems, primarily cost burdens. The production of rental/multifamily units has remained steady in the area in the past few years, but the increase in the proportion of renter households and the low rental vacancy rate indicates a strong need for additional rental units. By encouraging the development of additional rental/multifamily units throughout Thornton, and the rehabilitation or redevelopment of existing units, the area will be better prepared to accept the influx of additional renter households.

Actions:

1. Assess areas with established infrastructure that can accommodate additional rental/multifamily development.
2. Encourage rental developments through development incentives and fee waivers.
3. Review zoning requirements that may limit rental/multifamily developments and areas of increased density, especially in areas adjacent to existing amenities and infrastructure.
4. Review the availability and need for additional amenities, such as public K-12 schools, grocery stores and public transportation within the vicinity for new developments.

Recommendation 3: Encourage Development of Senior Housing

The elderly population in Thornton is growing. As the population continues to age, it will strain any existing senior housing and limit options for those who wish to age in place. A comprehensive approach including developing senior housing and making sufficient renovations to allow elderly households to age in place will fortify Thornton to accommodate a large portion of the population.

Actions:

1. Encourage the development of senior housing in close proximity to existing services and infrastructure through development incentives and fee waivers or deferments.
2. Review existing zoning requirements for lot size and density restrictions that may limit the amount of development of vacant or underdeveloped parcels over the course of the next several decades.

Recommendation 4: Encourage new construction of a variety of housing choices

This Housing Needs Assessment finds that the expected growth in Thornton will necessitate additional housing development to accommodate a variety of households. The additional units should be able to address the needs of all income levels. The development of single-family homes, at a variety of price points, will help ensure that incoming residents have access to their preferred housing options and meet the needs of incoming workers.

Actions:

1. Assess areas with established infrastructure that can accommodate additional rental and owner-occupied development.
2. Review the availability and need for additional amenities, such as public K-12 schools in areas with proposed new development.
3. Review the availability and need for grocery stores and public transportation within the vicinity for new developments.
4. Identify mixed housing opportunities in the city and encourage local decisions that promote a mix of housing types.
5. Coordinate with service and utility providers to ensure that plans are in place to provide adequate facilities as growth occurs.

B. FAIR HOUSING GOALS AND PRIORITIES

OVERVIEW

Title VIII of the 1968 Civil Rights Act, also known as the Federal Fair Housing Act, made it illegal to discriminate in the buying, selling, or renting of housing based on a person's race, color, religion, or national origin. Sex was added as a protected class in the 1970s. In 1988, the Fair Housing Amendments Act added familial status and disability to the list, making a total of seven federally protected characteristics. Federal fair housing statutes are largely covered by the following:

The Fair Housing Act,
The Housing Amendments Act, and
The Americans with Disabilities Act.

The purpose of fair housing law is to protect a person's right to own, sell, purchase, or rent housing of his or her choice without fear of unlawful discrimination. The goal of fair housing law is to allow everyone equal opportunity to access housing.

ASSESSING FAIR HOUSING

Provisions to affirmatively further fair housing are long-standing components of the U.S. Department of Housing and Urban Development's (HUD's) housing and community development programs. These provisions come from Section 808(e) (5) of the federal Fair Housing Act, which requires that the Secretary of HUD administer federal housing and urban development programs in a manner that affirmatively furthers fair housing.

In 1994, HUD published a rule consolidating plans for housing and community development programs into a single planning process. This action grouped the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Shelter Grants (ESG)¹, and Housing Opportunities for Persons with AIDS (HOPWA) programs into the Consolidated Plan for Housing and Community Development, which then created a single application cycle. As a part of the consolidated planning process, and entitlement communities that receive such funds from HUD are required to submit to HUD certification that they are affirmatively furthering fair housing (AFFH). This was described in the Analysis of Impediments to Fair Housing Choice and a Fair Housing Planning Guide, which was released in March of 1993.

In 2015, HUD released a new AFFH rule, which gave a format, a review process, and content requirements for the newly named "Assessment of Fair Housing", or AFH. The assessment would now include an evaluation of equity, the distribution of community assets, and access to opportunity within the community, particularly as it relates to concentrations of poverty among minority racial and ethnic populations. Areas of opportunity are physical places, areas within communities that provide things one needs to thrive, including quality employment, high performing schools, affordable housing, efficient public transportation, safe streets, essential services, adequate parks, and full-service grocery stores. Areas lacking opportunity, then, have the opposite of these attributes.

¹ The Emergency Shelter Grants program was renamed the Emergency Solutions Grants program in 2011.

The AFH would also include measures of segregation and integration and provide some historical context about how such concentrations became part of the community's legacy. Together, these considerations were then intended to better inform public investment decisions that would lead to amelioration or elimination of such segregation, enhancing access to opportunity, promoting equity, and hence housing choice. Equitable development requires thinking about equity impacts at the front end, prior to the investment occurring. That thinking involves analysis of economic, demographic, and market data to evaluate current issues for citizens who may have previously been marginalized from the community planning process. All this would be completed by using an on-line assessment tool.

However, on January 5, 2018, HUD issued a notice that extended the deadline for submission of an AFH by local government consolidated plan program participants to their next AFH submission date that falls after October 31, 2020. Then, on May 18, 2018, HUD released three notices regarding the AFFH; one eliminated the January 5, 2018, guidance; a second withdrew the on-line assessment tool for local government program participants; and, the third noted that the AFFH certification remains in place. The HUD Notice stated that the AFFH databases and the AFFH assessment tool guide would remain available for the AI; and, encouraged jurisdictions to use them, if so desired.

Hence, the AI process involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, housing transactions, locations of public housing authorities, areas having racial and ethnic concentrations of poverty and access to opportunity. The development of an AI also includes public input, and interviews with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified fair housing issues/impediments.

In accordance with the applicable statutes and regulations governing the Consolidated Plan, City of Thornton certifies that they will affirmatively further fair housing, by taking appropriate actions to overcome the effects of any impediments identified in the Analysis of Impediments to Fair Housing Choice, and maintaining records that reflect the analysis and actions taken in this regard.

OVERVIEW OF FINDINGS

As a result of detailed demographic, economic, and housing analysis, along with a range of activities designed to foster public involvement and feedback, City of Thornton has identified a series of fair housing issues/impediments, and other contributing factors that contribute to the creation or persistence of those issues.

Table I.1, on the following page, provides a list of the contributing factors that have been identified as causing these fair housing issues/impediments and prioritizes them according to the following criteria:

High: Factors that have a direct and substantial impact on fair housing choice

Medium: Factors that have a less direct impact on fair housing choice, or that City of Thornton has limited authority to mandate change.

Low: Factors that have a slight or largely indirect impact on fair housing choice, or that City of Thornton has limited capacity to address.

Table I.1
Contributing Factors
City of Thornton

Contributing Factors	Priority	Justification
Discriminatory patterns in lending	High	As demonstrated by 2008-2016 HMDA data, black and Hispanic loan denial rates exceeded 12.7 percent and 14.4 percent respectively, compared with 9.6 percent for white households.
Access to proficient schools	Low	School proficiency index is markedly lower for Hispanic populations than white school proficiency, indicating inequitable access for Hispanic households to proficient schools. However, City of Thornton has little control over increasing access on a large scale.
Access to low poverty areas	High	Hispanic households have lower access to low poverty areas than white households in the city, as demonstrated by low poverty indices. These areas are found primarily in areas of southern parts of Thornton.
Access to labor market engagement	Low	Hispanic households have lower access to labor market engagement as indicated by the Access to Opportunity index. However, the city has little control over impacting labor market engagement on a large scale.
Moderate levels of segregation for black households	High	Hispanic households have moderate levels of segregation in the city, which has increased since 2000. Other racial minorities that represent a small proportion of the overall population also have moderate to high levels of segregation in the City.
Insufficient affordable housing in a range of unit sizes	High	The rate of cost burden and severe cost burden for households at or below 30 percent HUD Area Median Family Income (HAMFI) in the city exceeds 83.6 percent.
Insufficient accessible affordable housing	High	The number of accessible affordable units may not meet the need of the growing elderly and disabled population, particularly as the population continues to age.
Black and Hispanic households tend to have higher rates of housing problems	High	Some 46.6 percent of black households and 46.2 percent of Hispanic households housing problems in 2015, according to CHAS data, compared to the jurisdiction average of 34.4 percent.
Location of public housing units tend to have lower levels of access to opportunity	High	The location of public housing units tends to be in areas with lower levels of access to proficient schools, low poverty areas, and labor market engagement.
Lack of fair housing infrastructure	High	The fair housing survey and public input indicated a lack of collaboration among agencies to support fair housing.
Insufficient fair housing education	High	The fair housing survey and public input indicated a lack of knowledge about fair housing and a need for education.
Insufficient understanding of credit	High	The fair housing survey and public input indicated an insufficient understanding of credit, used to access mortgages.

ADDITIONAL FINDINGS

In addition to the table above, there are several significant findings. Overall, City of Thornton has a moderate level of segregation by race and ethnicity, particularly for black households. The city does not have any Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) at the time of this report. R/ECAPs are geographic areas that contain at least 50 percent minority, or non-white, population, and at least a 40 percent poverty rate. This is explained in further detail in section ***IV.D. Racially and Ethnically Concentrated Areas of Poverty.***

Black households have lower access to areas of opportunity, including access to proficient schools, low poverty areas, and labor market engagement.

Black and Hispanic households have a higher incidence of housing problems, as well as a higher incidence of mortgage denials in the city.

The survey and public input revealed there is a continued need for fair housing outreach and education in the city. The Land Use Planner Survey found that the use of the word “family,” zoning density minimums, and a lack of accessible development standards may limit access to housing options in the city.

FAIR HOUSING ISSUES, CONTRIBUTING FACTORS, AND PROPOSED ACHIEVEMENTS

The Table I.2, on the following page, summarizes the fair housing issues/impediments and contributing factors. It includes metrics and milestones and a timeframe for achievements.

Table I.2
Fair Housing Issues, Contributing Factors, and Recommended Actions
 City of Thornton

Fair Housing Issues/ Impediments		Contributing Factors	Recommended Action to be Taken
Segregation		Moderate levels of segregation for black households	Review zoning and Comprehensive Plan for potential barriers to affordable housing options, including density maximums and lot size requirements; recommend appropriate amendments each year, over the next five (5) years.
Disparities in Access to Opportunity		Access to proficient schools	Review opportunities annually to increase funding sources for additional low-income housing in high opportunity areas. Explore opportunities annually for redevelopment or rehabilitation of residential properties in high opportunity areas.
		Access to low poverty areas	
		Labor market engagement	
Disproportionate Housing Needs		Black and Hispanic households tend to have higher rates of cost burdens	Encourage the development of future affordable housing sites in high opportunity areas.
		Insufficient affordable housing in a range of unit sizes	
Publicly Supported Housing		Location of public housing units tend to have lower levels of access to opportunity	Locate any future publicly supported housing units in high opportunity areas. Research opportunities for increased funding options annually.
		Insufficient accessible affordable housing	
Disability and Access		Insufficient accessible affordable housing	Review development standards for accessible housing and inclusionary zoning policies for accessible housing units; recommend appropriate amendments each year, over the next five (5) years. Encourage a percentage of new housing developments to include accessible units.
Fair Housing Enforcement and Outreach		Insufficient fair housing education	Promote fair housing education through annual or biannual workshops.
		Insufficient understanding of credit	Promote outreach and education related to credit for prospective homebuyers.
		Discriminatory patterns in lending	Continue use of fair housing outreach brochures, city website outreach

SECTION II. COMMUNITY PARTICIPATION PROCESS

The following section describes the community participation process undertaken for the 2019 City of Thornton Analysis of Impediments to Fair Housing Choice.

A. OVERVIEW

The outreach process included the 2018 Fair Housing Survey, a public input meeting, and a public review meeting.

The Fair Housing Survey was distributed as an internet outreach survey, as well as being made available as a printed version. As of the date of this document, 10 responses have been received.

The Housing Needs survey was distributed as an internet outreach survey, as well as being made available as a printed version. As of the date of this document, 687 responses have been received.

The Thornton Employer Survey was conducted via telephone surveys of employers in Thornton to gather additional feedback on the needs of workforce housing in Thornton. Some 20 employers took part in this survey.

One public input meeting was held on January 31, 2019 in order to gather feedback and input from members of the public.

The Draft for Public Review AI was made available on February 7, 2019 and a 30-day public input period was initiated.

A public hearing was held during the public review period in order to gather feedback and input on the draft Analysis of Impediment. After the close of the public review period and inspection of comments received, the final report was made available to the public at the beginning of February, 2019.

B. THE 2018 FAIR HOUSING SURVEY

The purpose of the survey, a relatively qualitative component of the AI, was to gather insight into knowledge, experiences, opinions, and feelings of stakeholders and interested citizens regarding fair housing as well as to gauge the ability of informed and interested parties to understand and affirmatively further fair housing. Many individuals and organizations throughout City of Thornton were invited to participate. At the date of this document, some 10 responses were received. A complete set of survey responses can be found in **Section VI.H Fair Housing Survey Results**.

C. THE 2018 HOUSING NEEDS SURVEY

The Housing Needs Survey was conducted to gather feedback on the various housing needs in the community. This qualitative component of the study includes insight into the perceived need for housing and amenities in the City of Thornton. A total of 687 responses have been received, to date. A complete set of survey responses can be found in **Section V.E. Housing Needs Survey**.

D. EMPLOYER SURVEY

The Thornton Employer Survey was undertaken in late 2018 to gather feedback and input from employers within the city and the relative need for housing for the city's workforce. Some 20 employers participated in the survey, and a complete set of responses can be found in **Section V.F. Employer Survey**.

E. PUBLIC INPUT

The Home Builders Association of Metro Denver wrote a letter to provide input in the city's Housing Needs Assessment. A summary of their input is outlined below, and the complete letter is included in the Appendix.

- Costs remain a top challenge for builders
- The high level of demand for housing is still outpacing supply of housing
- The City's current zoning code does not allow for balanced housing

A Mayor's meeting to discuss housing issues is summarized below. A complete summary is included in the Appendix.

- Agreed need for affordable housing in the city
- Biggest challenge to affordable housing is funding
- Challenged by NIMBYism in the community

A public input meeting was held on January 31, 2019. This meeting was held to provide residents and stakeholders preliminary information gathered for the Analysis of Impediment (AI) and offer an opportunity to provide feedback and insight into fair housing in the city. A complete transcript of the proceedings is included in the appendix. A summary of comments received will be included below.

- Need for a variety of housing units that meet a variety of incomes
- Many working households are spending more than 30 percent of their income on housing
- Rental prices are unaffordable as well
- Zoning should be looked at to allow for more multifamily housing
- The Thornton workforce cannot live in Thornton
- NIMBYism continues to be a challenge

F. THE FINAL PUBLIC REVIEW PROCESS

A 30-day public review process was held February 7, 2019 through March 15, 2019.

It included a public review meeting on February 19, 2019. Comments from this meeting will be summarized below. A transcript from the proceedings is included in the Appendix.

- Is there housing available to meet the needs of a growing elderly population?
- Multigenerational and regional approaches to housing issues should be considered

A public hearing was held on April 9, 2019. Additional public comments are shown in Appendix C.

SECTION III. ASSESSMENT OF PAST GOALS AND ACTIONS

An Analysis of Impediments to Fair Housing Choice for City of Thornton was last completed in 2014. The conclusions drawn from this report are outlined in the following narrative.

A. PAST IMPEDIMENTS AND ACTIONS

Impediment 1. Housing discrimination for people with disabilities is an impediment to fair housing choice.

People with disabilities have a higher propensity to experience discrimination when looking for housing, have a limited amount of rental housing that offer accessible features and more likely to fall below the poverty level, thus, finding it harder to find an affordable place to live. Housing discrimination, based upon HUD and the Colorado Civil Rights Division complaints, occurs on a limited basis related to disabilities. Since 2008, 11 out of the 12 cases that were reported cited physical or mental disability as the most common protected class affected. All of the cases were found to have no cause and were dismissed. This data supports a trend that people with disabilities may be experiencing discrimination on some level. The housing profile section of this document also found that there was an overall lack of multifamily housing units that are fully accessible to people with disabilities. Providing reasonable accommodations is a requirement of the Fair Housing Act. In addition, people with disabilities are more likely to fall below the poverty level and may find it difficult to find a place to live that they can afford.

Action 1A: The city will work with service providers, the Adams County Housing Authority, HUD-Fair Housing office, and the Colorado Civil Rights Division to increase awareness and understanding of fair housing as it pertains to people with disabilities, including what is considered reasonable accommodations.

Action 1B: The city should support developers in building new affordable, accessible units, and rehabilitating existing affordable units or apartment owners accepting Section 8 vouchers or setting aside a few apartments for low-income people.

Impediment 2. A concentration of low-income housing in areas where a high concentration of protected classes live is an impediment to fair housing choice.

Data confirms that the city's affordable rental and lower priced for-sale housing is concentrated in the southern part of the city. There is a higher concentration of those who are in a protected class in these same areas. This may constitute an impediment to fair housing choice, because, as the demographic and housing profile sections of this document indicated, minorities are significantly more likely to be low-income and to be cost burdened by their housing payments. In addition, there is an overall gap in rental and for-sale units affordable to low-income households, and a lack of affordable units that are large enough for larger families. As a result, the lack of affordable housing units may constitute an impediment to fair housing choice for protected classes including race, color, national origin, and familial status. While those of the protected class may be choosing to move into this area, they may feel that this area is their only

option. The private housing market may be inadvertently segregating people of protected classes to one area of the community.

Action 2A: The city should support the development of new or rehabilitation of existing affordable housing units north of 104th.

Action2: The city should look for opportunities to encourage developers or property owners in the northern section of the city to establish a few units in a larger housing development at below market rate.

Impediment 3. NIMBYism (“Not In My Backyard”): Public opposition to affordable housing is an impediment to fair housing choice.

Public opposition to proposed affordable housing rental complexes may limit the types of housing and opportunities for protected classes to find a place to live. While public comment is valued by HUD, the federal agency is aware that the public can discriminate against people of a certain race, ethnicity, religion, sex, familial status, disability, and or national origin through strong opposition and pressure to eliminate or prevent certain types of housing that these classes may need in or near their neighborhoods. Proposals for affordable housing have met with some opposition from residents who live near the proposed sites. At a recent community meeting for the 88th and Welby TOD station, residents expressed opposition to affordable housing and multifamily developments, because of their perception that affordable housing or multifamily developments brought more noise and crime to the neighborhood. This is common when housing developers propose to build new rental housing at other places in the city. As the city strives to obtain a better balance of housing for all income levels and ensure that more affordable housing options are available north of 104th , opposition by residents is likely to continue.

Action 3A: The city should look for ways to promote affordable housing that has successfully integrated into the community and reduce the perception that a low-income person is a criminal.

Action 3B: The city should openly support affordable and mixed income housing that meets the city’s requirements and Affordable Housing Policy.

Potential Impediment. Minority populations may be more likely to experience discrimination is an impediment to fair housing choice.

People of minority races and ethnicities could experience discrimination if they are not aware of their rights or what constitutes discrimination. While this is not an impediment that has been found in Thornton, it is a potential impediment considering reports in the metro area indicate that minorities have experienced discrimination when looking for rental housing. Thornton data indicated Hispanic households had a loan denial rate almost twice as high as non-Hispanic households. The denials were attributed to poor credit history and debt to income ratio, which are justifiable reasons to deny a loan. However, it may indicate that there is lack of information about home purchase requirements.

Action 4A: The city should participate in any regional fair housing educational campaign that DRCOG or DMFHC may conduct.

Action 4B: The city should continue its verbal and written translation services and seek ways to increase bilingual communication about homebuyer education opportunities or renter rights information hosted at or supported by the city.

Continued Actions

As part of the fair housing action plan, there are steps that the city should continue to take to ensure it does not create new impediments to fair housing choice in the future.

- The city should continue to provide educational information on the website and at front counters of the City Development building. They should continue to reach out to homeowner associations and through meetings with apartment and manufactured home park managers regarding fair housing law and requirements.
- The city should continue to evaluate its Limited English Proficiency Plan to ensure that any changes in the demographics of Thornton are reflected in its Annual Action Plan. Spanish is the second most widely spoken language in Thornton.
- The city will maintain its outreach to citizens and housing industry personnel to increase awareness of Fair Housing regulations and the avenues which exist for obtaining redress in situations where discrimination has allegedly occurred.
- The city adopted an Affordable Housing Policy to support development of affordable housing near transit and other key services that the protected class populations may need. CSI also reviewed the city's current regulations and fees which were not found to be a significant impediment. In the future, the city should be cognizant of how regulations and fee changes may impact fair housing choice.

FAIR HOUSING ACTIVITIES

The following actions have been described in the city's 2017 Consolidated Annual Performance and Evaluation Report (CAPER):

To address the concern about people with disabilities being more likely to experience housing discrimination, the city continued to provide residents with access to information about fair housing laws and resources and supported projects aimed at increasing accessibility:

- The City dedicated a page on the website to explain fair housing laws and resources for those who believe they may be experiencing discrimination.
- HUD fair housing brochures and flyers are available at City Hall. These include Are you a victim of housing discrimination (English and Spanish), HUD - Fair Housing Equal Opportunity for All, Colorado Civil Rights Division – Housing Discrimination (English and Spanish).
- Neighborhood Services and the Police Department continued coordinating meetings for the apartment and manufactured home park managers. Attendees represent 57 multi-family rental properties and manufactured home parks located in the city.

City of Thornton's Current and Future Fair Housing and Equal Opportunity (FHEO) Activities

FHEO Action	Measurement Indicator	Measurement Goal	Timeframe	Status of Action
Provide residents with Fair Housing and discrimination information in person or via the phone. Inform residents of their rights and refer to Denver Metro Fair Housing Center (DMFHC), HUD and Colorado Civil Rights Division	Staff to make referrals to these agencies	As needed	2010 – Present	Ongoing
Provide residents with information on their fair housing rights on the City of Thornton's website	Indicator 1: Upload webpage with FHEO information Indicator 2: Maintain webpage and ensure accessibility to residents	Indicator 1: webpage Indicator 2: Check annually to update, if needed	December 2010 – Present	Indicator 1 - Complete Indicator 2 - Ongoing
Provide Thornton rental managers with information and materials related to FHEO	Provide information and/or materials to managers	Annually as needed	2010 – Present	Ongoing- Complete for 2017: Hosted a Fair Housing 101 training at a property managers meeting
Fund and administer the minor home repair program for accessibility and safety improvements for low and moderate income households	Households served	20 households annually	August 2010 - Present	Ongoing – Complete for 2017: 16 households were served
Host and promote home buyer classes	Indicator 1: Host Classes Indicator 2: Place information on city's website and newsletter	Indicator 1: 4 classes per year Indicator 2: Post/publish information	2010 – Present	Ongoing – Complete for 2017 A total of 18 classes hosted
Use Private Activity Bonds to preserve affordable housing in the City of Thornton	Indicator 1: Assignment of bonds Indicator 2: Units rehabilitated	165 units	September 2011 – 2017	Indicator 1: Complete Indicator 2: Complete
Use phone translation services to provide interpretation and translation of documents for Thornton residents.	Indicator 1: Execute contract with service provider Indicator 2: Install 2 way headset phones at City Development counters Indicator 3: Use Service	Indicator 1: Contract executed Indicator 2: Install phone lines Indicator 3: Utilized on as need basis	October 2011 – Present	Indicator 1 - Complete Indicator 2 – Complete Indicator 3 – Ongoing

FHEO Action	Measurement Indicator	Measurement Goal	Timeframe	Status of Action
Develop, update and distribute the Handbook for Manufactured Home Residents	Indicator 1: Develop/update handbook Indicator 2: Translate to Spanish Indicator 3: Provide to residents	Handbook created in 2012, Reviewed annually	2012 – Present	Indicator 1: complete Indicator 2: completed in 2015 Indicator 3: Ongoing
Update translated brochures and educational materials that provide information to low- and moderate-income, Spanish speaking residents.	Update information/materials	Annually and as needed	January 2012 – Present	Ongoing
Utilize Google Translate on City of Thornton's webpages to allow for use by monolingual non-English speakers	Indicator 1: Installed on City's website Indicator 2: Use service	Indicator 1: Install on website Indicator 2: Used as needed	October 2012 - Present	Indicator 1 - Complete Indicator 2 – Ongoing
Support down payment and closing cost assistance programs for low-income and minority populations	Households served	53 households	October 2010 – December 2018	Complete – served 83 households since 2010
Support rehabilitation of foreclosed single-family homes for re-sale to low-income individuals	Homes rehabilitated and sold	7 homes	October 2012 – June 2015	Complete
Use Private Activity Bonds to support increasing the amount of affordable housing in the City of Thornton	Indicator 1: Assignment of bonds Indicator 2: Units constructed	Estimated 200-338 units	September 2017 – October 2020	Indicator 1: Complete Indicator 2: Ongoing
Fund Mortgage Credit Certificates to finance a tax deduction for qualified new home buyers, which helps reduce cost of purchasing a house	Indicator 1: Households served	Indicator 1: 68 households served	2013 – 2017	Indicator 1 – Complete: 67 households served
Collaborate with DMFHC to provide residents with information and identify opportunities to collaborate	Indicator 1: Distribute Information Indicator 2: Continue discussions	Annually as Needed	2013 - Present	Ongoing
Complete the Analysis of Impediments to Fair Housing, including evaluating previous AI	Document Completed	1 Analysis of Impediments	September 2013 - September 2014	Complete
Use CDBG to support the rehabilitation of aging and un-safe affordable rental housing and convert a portion of the units to accessible units	Households served/Units upgraded	66 households	October 2013 – October 2014	Complete
Support a home loan program to rehabilitate aging and unsafe housing	Households served/Units upgraded	1 household a year	October 2014 – Present	Ongoing – Complete for 2017 1 Household served
Collaborate with the MDHI to identify partnership opportunities and share information and resources	Continue collaborative efforts	Annually as Needed	November 2014 - Present	Ongoing

FHEO Action	Measurement Indicator	Measurement Goal	Timeframe	Status of Action
Review and update the language in the City code pertaining to group homes to comply with the Federal Fair Housing Act	Complete evaluation of and updates to code	1 City code Amendment	November 2014 - February 2016	Complete
Improve the accessibility of the entrance to a permanent supportive housing complex	Households benefitted	180 units	December 2014 – May 2016	Complete
Improve the accessibility of a section of sidewalk in a low-income neighborhood	Complete project	Project completed	October 2015 – March 2017	Complete
Provide support to and collaborate on the development and implementation of a tenant-based rental assistance program for families at risk of homelessness	Indicator 1: Collaborate with school district and housing authority Indicator 2: Households served	Indicator 1: Complete Indicator 2: 5 households	November 2015 – December 2017	Indicator 1: Complete Indicator 2: Complete
Support an emergency rent and utility assistance program for victims of domestic violence	Clients served	25 clients	March 2016 – December 2018	Indicator 1: 9 people served in 2017
Host home maintenance workshops to educate and inform residents on maintaining their home and available resources	Host classes	2 classes annually	April 2016 – December 2017	Ongoing – Complete for 2017 2 workshops held
Acquire and rehabilitate housing that will be sold to LMI buyers.	Indicator 1: Houses rehabilitated Indicator 2: Houses sold	Indicator 1: 2 houses rehabilitated Indicator 2: 2 houses sold	November 2017 – present	Currently Underway
Support the development of affordable rental housing	Housing units developed	64 units	January 2018 – July 2020	Currently Underway
Support an emergency rent and utility assistance program for low- and moderate income residents	Clients served	20 households	June 2018 – June 2019	Currently Underway
Prepare to complete/update the Housing Needs Assessment	Document Completed	1 Housing Needs Assessment	May 2018 – March 2019	Currently Underway
Update the Analysis of Impediments to Fair Housing, including evaluating previous AI	Document Completed	1 Analysis of Impediments	August 2018 – October 2018	Currently Underway
Review the Limited English Proficiency Plan and re-evaluate the methods used to reach these populations.	Complete evaluation	1 Limited English Proficiency Plan	September 2018	Future Activity

Appendix - Alternate/Local Data Sources

1	Data Source Name Community Planning and Development (CPD) Maps
	List the name of the organization or individual who originated the data set. U.S. Department of Housing and Urban Development
2	Data Source Name Housing and Population Counts
	List the name of the organization or individual who originated the data set. City of Thornton
3	Data Source Name Housing Needs Assessment & Analysis of Impediments
	List the name of the organization or individual who originated the data set. City of Thornton and Community Strategies Institute (CSI)
4	Data Source Name Economic Development Strategic Plan
	List the name of the organization or individual who originated the data set. City of Thornton Economic Development Division and Greyhill Advisors
5	Data Source Name CDPHE Annual Lead-Based Paint Testing
	List the name of the organization or individual who originated the data set. Colorado Department of Public Health and Environment (CDPHE)
6	Data Source Name Adams County Community Engagement Survey
	List the name of the organization or individual who originated the data set. Adams County and participating municipalities (Thornton, Westminster, Brighton)
7	Data Source Name 2017 Five-Year ACS
	List the name of the organization or individual who originated the data set. U.S. Census Bureau
8	Data Source Name 2018 Five-Year ACS

	List the name of the organization or individual who originated the data set. U.S. Census Bureau
9	Data Source Name 2017 Hazard Mitigation Plan
	List the name of the organization or individual who originated the data set. Cities of Thornton, Northglenn, and Federal Heights