



PY 2024 Consolidated Annual Performance and Evaluation Report (CAPER)

DRAFT

Town of Castle Rock
100 N. Wilcox St.
Castle Rock, CO 80104

Table of Contents

CR-05 - Goals and Outcomes.....	3
CR-10 - Racial and Ethnic composition of families assisted.....	7
CR-15 - Resources and Investments 91.520(a)	8
CR-20 - Affordable Housing 91.520(b)	11
CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)	13
CR-30 - Public Housing 91.220(h); 91.320(j)	17
CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)	18
CR-40 - Monitoring 91.220 and 91.230	22
CR-45 - CDBG 91.520(c).....	25
CR-58 - Section 3	26

CR-05 - Goals and Outcomes

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

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

The Town of Castle Rock is designated as an entitlement jurisdiction, receiving an annual allocation of federal Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). These funds assist the Town in addressing housing and community development objectives specified by HUD, which include, but are not limited to, improvements to public facilities and infrastructure, as well as essential public services for individuals with special needs and low- to moderate-income (LMI) populations. For Program Year (PY) 2024, the Town was awarded \$264,043 from its annual CDBG allocation. The following highlights the accomplishments and uses of these funds for PY 2024.

Public Facilities and Infrastructure Improvements: In PY 2024, the Town completed three activities to replace pool lifts that had exhausted their life span. These improvements were made at the Burgess Pool (#23), the Miller Activity Complex (#24) and Butterfield (#25), and had an unduplicated benefit to 706 LMI persons. The pool lifts ensure continued ADA compliance for these facilities. The Town also completed improvements to a restroom at Cantril School (#22), removing architectural barriers, which will make it ADA accessible. There were 2,442 LMI individuals that benefitted from these improvements.

Supportive Services: In PY 2024, the Town funded the Castle Rock Senior Activity Center's Home Delivery of Hot Meals program (#20) to assist 292 LMI elderly persons with meal delivery and food services. The program targeted the most socially isolated and those with the most economic need as all beneficiaries were LMI.

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

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

Goal	Category	Source	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
1A Improve Access to Public Facilities (ADA)	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	14,925	9,798	65.64%	2985	3,148	105.46%
1B Improve Capacity of Public Infrastructure LMI	Non-Housing Community Development	CDBG	Public Facility or Infrastructure Activities other than Low/Mod Income Housing Benefit	Persons Assisted	14,925	0	0.00%	2,985	0	0.00%
2A Provide Supportive Services for Seniors	Non-Homeless Special Needs	CDBG	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	500	756	151.20%	50	292	584.00%
2B Provide Supportive Services LMI & Special Needs	Non-Homeless Special Needs	CDBG	Public service activities other than Low/Mod Income Housing Benefit	Persons Assisted	500	0	0.00%	50	0	0.00%

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

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

PY 2024 is the fourth year of the 2021-2025 Consolidated Plan period, and the Town has identified its priority needs for the community as 1.) Improvements to Public Facilities & Infrastructure and 2.) Supportive Services for LMI & Special Needs. CDBG-funded activities must address one of these needs as well as primarily benefit LMI persons or special needs populations, such as elderly persons.

During the program year, the Town worked to address the needs of the community through public facility improvements and public services for the elderly. These funded activities were developed to address the identified priority needs in the Consolidated Plan. The following describes the use of CDBG funds in PY 2024:

Supportive Services for LMI & Special Needs: \$17,848.67 (13.1%)
 Public Facilities & Infrastructure Improvements: \$86,534.46 (63.5%)
 Administration of the CDBG Program: \$31,854.98 (23.4%)
 Total: \$136,238.11

Note: Please note, the Town follows strict grant based accounting guidelines. For each FY CDBG grant allocation, there is a maximum spending cap of 15% for public services, and 20% for administrative costs.

The Town ensures it will not spend more than the max allowable under CDBG guidelines for the FY grant awards.

PY 2024 CR-05 Goals and Outcomes Comparison

Public Facilities & Infrastructure

1A Improve Access to Public Facilities (ADA): The Town had a goal to assist 2,985 persons with this goal, and assisted 3,148 LMI persons. In PY 2024, the Town completed three activities to replace pool lifts that had exhausted their life span. These improvements were made at the Burgess Pool (#23), the Miller Activity Complex (#24) and Butterfield (#25), and had an unduplicated benefit to 706 LMI persons. The pool lifts ensure continued ADA compliance for these facilities. The Town also completed improvements to a restroom at Cantril School (#22), removing

architectural barriers, which will make it ADA accessible. There were 2,442 LMI individuals that benefitted from these improvements.

1B Improve Capacity of Public Infrastructure LMI: The Town had a goal to assist 2,985 persons with this activity; however this goal was not met. As there are limited funds, the Town may prioritize improvements to facilities or infrastructure within the program year, but may not be able to prioritize both. This still continues to be a need, and the Town will continue to seek opportunities as they arise.

Supportive Services for LMI & Special Needs:

2A Provide Supportive Services for Seniors: The Town had a goal to assist 50 persons with this activity, and assisted 292 LMI elderly persons through the Castle Rock Senior Activity Center Home Delivery of Hot Meals program (#20).

2B Provide Supportive Services LMI & Special Needs: The Town had a goal to assist 50 persons with this activity. This goal will be combined with goal 2A as the intended target group receiving public services are LMI seniors.

CR-10 - Racial and Ethnic composition of families assisted

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

	CDBG
White	3,195
Black or African American	123
Asian	1
American Indian or American Native	0
Native Hawaiian or Other Pacific Islander	0
Total	3,360
Hispanic	285
Not Hispanic	3,155

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

Narrative

DATA NOTE: Race/ethnicity data was drawn from the PR-03 activity summaries and PR-23 summary of accomplishments for PY 2024. The table above does not include a category for people that identify as “other multi-racial”. Due to this, the racial/ethnic data in the above table may not necessarily match the number of persons actually served by the CDBG program. For example, the table above shows 3,360 total persons reported by race; however the actual total was 3,440 persons. This was due to the reporting table in IDIS not having a category for “other multiracial” of which there were 80 persons.

According to the 2018-2022 American Community Survey 5-Year Estimates (DP-05), the population in Castle Rock was 74,065 persons. An estimated 87.3% were White, followed by 2.2% for Asian and 0.8% for Black or African American persons. “Some other” race made up 2.2% of the population and “Two or more” races made up 7.0% of the population. All other races accounted for less than 1%. About 10.7% of the Town population identified ethnically as Hispanic or Latino.

For activities where the Town recorded race/ethnicity information, 92.9% of CDBG funding went towards assisting White persons, 3.6% to Black or African American persons and 1.2% to Native Hawaiian or Other Pacific Islander persons. All other races were less than 1%. An estimated 8.3% of persons assisted with CDBG funding identified ethnically as Hispanic. Benefits were generally in line with the Town-wide demographic population.

While the Town adequately assisted Black or African American households in PY 2024, the Town recognizes the need to identify all minority groups, such as Asians, Native American and Alaskan Natives, and Native Hawaiian or Other Pacific Islander households, for assistance with CDBG programs even if their populations are small. There is also a need to reach more Hispanic persons.

CR-15 - Resources and Investments 91.520(a)**Identify the resources made available**

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	264,043	136,238

Table 3 - Resources Made Available**Narrative**

In PY 2024 the Town had resources made available in the amount of \$264,043 in CDBG funds from the annual allocation. According to the PR-07, during the program year the Town spent \$136,238.11 on public services for elderly persons, public facility improvements and admin of the CDBG program. Unspent funds have already been programmed towards other eligible uses such as public facility improvements and will be expended as activities are completed. The following lists expenditures by priority need:

Supportive Services for LMI & Special Needs: \$17,848.67 (13.1%)

Public Facilities & Infrastructure Improvements: \$86,534.46 (63.5%)

Administration of the CDBG Program: \$31,854.98 (23.4%)

Total: \$136,238.11

Note: Each FY CDBG grant allocation has a maximum expenditure cap limit of 20% for admin costs and 15% for public services, and expenditures will not exceed these cap amounts. These costs are budgeted during the AAP development process and are approved by HUD. Once all FY funds have been expended and programmed, the Town ensures that final expenditures of the FY 2024 grant allocation will meet the required guidelines of the grant.

FY CDBG Grant Allocation Close-Out

Each year the Town reports if a prior FY CDBG annual allocation has been fully spent. At the end of PY 2022, the Town fully expended their FY 2021 allocation. The Town contacted HUD on January 11, 2024 to notify them that the 2021 grant had been fully expended. HUD responded that they would not invoke the close out process until 2028 and that no further action was needed. There were no other FY annual allocations fully spent during PY 2024.

Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
N/A	N/A	N/A	N/A

Table 4 – Identify the geographic distribution and location of investments**Narrative**

The Town of Castle Rock does not allocate funding solely based on geographic requirements. When the planned activities are intended to directly serve individuals or households, those individuals or households must meet income and residency qualifications to receive assistance from the program. In these instances, Town staff and/or one of its partner agencies shall complete an in-take and eligibility status review of the applicant individual or household before the project/activity is initiated.

Additionally, the Town may identify infrastructure and public facility improvement activities. In this case, the planned activities serve a specific community or neighborhood. These activities are said to have an “area-wide” benefit. Per HUD requirements, these areas must be within an eligible Census Block Group Tract, as defined by HUD-CDBG regulations. HUD determines Low/Mod block group tracts as those with a 51% LMI population. However, the Town of Castle Rock is an exception grantee with the LMI block group threshold lowered to 32.73%.

HUD CDBG Low/Mod Income Summary Data (LMISD), which have defined the eligible Low/Mod block group tracts within the jurisdiction can be found on the HUD Exchange website at: <https://www.hudexchange.info/programs/acs-low-mod-summary-data/>

Leveraging

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

CDBG funding leverages in-kind resources and program activities for Castle Rock seniors from the Castle Rock Senior Activity Center, the State of Colorado property tax exemption and deferral program, the Denver Regional Council of Governments and the Aging Resources of Douglas County. HUD CDBG program funds do not require a dollar-for-dollar match. As funds are limited, the Town seeks to leverage additional resources with its federal CDBG funds.

Publicly owned land/property used to address the needs in the plan

The Town is focused on improving public facilities and infrastructure in low-to-moderate-income (LMI) areas of Castle Rock. The identified public improvements include sidewalks, streets, Town parks, and Town-owned facilities. This priority was established through a citizen participation process and community and stakeholder surveys conducted during the development of the Consolidated Plan (ConPlan). The Town has identified planned sidewalk improvements at Canyon Drive for PY 2025 and will continue to target its efforts towards Town-owned streets and sidewalks in low/moderate-income block group tracts that benefit the community as a whole. The Castle Rock Senior Activity Center is utilized to provide supportive services to elderly residents in the Town.

CR-20 - Affordable Housing 91.520(b)

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

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

Table 5 – Number of Households

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

Table 6 – Number of Households Supported

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

The Town of Castle Rock does not provide direct funding for affordable housing projects using CDBG funds. Due to limited resources, the Town has focused its available funding on public services, public facilities, and infrastructure improvements during this five-year Consolidated Plan period. The Town believes that investing in essential services and enhancing public facilities—along with improving infrastructure such as streets and sidewalks—will attract housing investments to low- and moderate-income areas.

Discuss how these outcomes will impact future annual action plans.

At this time, the Town does not anticipate any changes to the needs and goals identified in the 5-year ConPlan and there are no plans to add affordable housing development or preservation to future annual action plans within the current 5-year planning period. If the need for affordable housing programs arise,

the Town will document this need and take the necessary steps to include new priorities and goals to the plan, both through the required citizen participation process and the plan amendment process.

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

Number of Households Served	CDBG Actual
Extremely Low-income	0
Low-income	0
Moderate-income	0
Total	0

Table 7 – Number of Households Served

Narrative Information

The Town of Castle Rock does not directly fund affordable housing projects with CDBG funding. There were no affordable housing activities completed by the Town in PY 2024.

Worst Case Needs

The most vulnerable households in our community are those with extremely low incomes or special needs who are at imminent risk of homelessness and require affordable housing or emergency assistance. While the Town does not directly fund assistance for homeless individuals or households with extremely low incomes through affordable housing programs, it is committed to supporting the community by funding programs that benefit our most at-risk residents. This includes funding supportive services such as hot meal programs for the elderly, which help reduce basic living costs and provide essential support, allowing seniors to age in place. The goal of these initiatives is to prevent housing instability and ultimately reduce the number of homelessness cases in Castle Rock.

The Town did not specifically report any persons with a disability in its CDBG program, however if a household with a disability is identified for assistance in one of its programs, the Town will make all necessary accommodations within reason to meet the needs of the household.

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

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

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

The Town of Castle Rock relies on Douglas County and its partnership with the Metro Denver Homeless Initiative Continuum of Care (MDHI) to address the needs of the local homeless population. In addition, the Town engages various local service agencies to reach out to and provide support for individuals experiencing homelessness.

The MDHI coordinates efforts across all seven counties in the Denver area, collaborating with numerous local providers to ensure that the needs of the homeless population are met. This initiative oversees programs that include supportive services, emergency shelters, transitional housing, and permanent supportive housing, all aimed at preventing homelessness. The Homeless Management Information System (HMIS) is utilized to track data on local homeless populations and to manage MDHI services and program funding. While the Town of Castle Rock does not have these resources available locally, it maintains a close relationship with the MDHI and refers individuals to their services as needed.

The Town of Castle Rock engages with MDHI to address the needs of individuals experiencing homelessness to necessary services. Several service providers that are located near or within the Town currently reach out to homeless populations, including Catholic Charities, Help and Hope Center, Parker Task Force, and SECOR Cares.

Addressing the emergency shelter and transitional housing needs of homeless persons

The Town refers to the MDHI for the emergency housing and transitional housing needs of homeless persons in Castle Rock. Unfortunately, identifying persons experiencing homelessness and directly addressing their needs is difficult within the Town due to limited resources and a small homeless population within the Town. The 2025 PIT Count, conducted on January 27, 2025 identified 58 homeless persons for all of Douglas County, including 28 unsheltered and 30 sheltered. Current programs that reach out and support the homeless in Castle Rock and Douglas County include the facilitation of hotel vouchers by the following agencies: Catholic Charities, Help and Hope Center, Parker Task Force, and SECOR Cares.

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

The Douglas County Department of Community Services, along with other stakeholders, launched the Housing Stability Program in August 2024. This program aims to support at-risk households to help prevent homelessness. The initiative is available to eligible residents of Castle Rock. The Town is focused on prevention through various public service activities, primarily targeting the elderly, as described below.

Within Castle Rock, the Town used CDBG funds to work directly to benefit LMI individuals and households in the community and address homelessness by providing services that directly or indirectly work to prevent poverty or conditions that may lead to homelessness. In the 2024 program year, the Town used CDBG funds to support the Senior Center Home Meal Delivery program, which targeted elderly and disabled populations.

Additionally, the Town has access to the Douglas County Cares program, which is comprised of County and local partner agencies, which work in partnership for the benefit of homeless and vulnerable residents. This program involves case management and other supportive services to increase the client's chances of obtaining and maintaining self-sufficiency. A variety of assistance, services, and tools are made available to participants to overcome barriers to achieving stability, capacity, capability, and opportunity.

Other Special Needs Activities:

Elderly and Persons With a Disability:

The Town is dedicated to enhancing the quality of life for its elderly and disabled residents. To support this goal, a range of activities and services are planned, including ADA improvements to public facilities and infrastructure, as well as supportive services such as senior programs. In the fourth year of the Consolidated Plan, the Town aimed to serve approximately 100 low- and moderate-income (LMI) individuals with special needs through these public service activities.

The Town strives to ensure access for elderly individuals and persons with disabilities at all community facilities it operates. One key location, the Castle Rock Recreational Center, offers health and wellness activities for all families, including seniors and individuals with disabilities. The center features a senior fitness program and has designated hours for elderly participants. Additionally, it provides discounts for seniors age 62 and older.

The Castle Rock Senior Activity Center organizes a variety of special events, which can take place either on-site or off-site. These events are designed for diverse purposes, such as fundraising, community engagement, socializing, and learning new skills. Transportation services are also available at the center. Butterfield Crossing Park is an ADA-accessible recreational facility that includes a pool with a lift for individuals with disabilities and a zero-depth entry wading pool. Furthermore, a new playground has been completed for children ages 5 to 12, featuring inclusive designs for children with disabilities.

Persons living with HIV/AIDS and their families:

At this time there are very few service providers for this special needs group in Castle Rock; however,

persons can be referred to the CO Department of Public Health & Environment HIV Care Core and Support Services program. The program provides an expansive program with multiple care and support options, both non-medical and medical (by referral). There is intensive case management and also emergency assistance provided. More information on the program can be found at: <https://cdphe.colorado.gov/hiv-care-core-and-support-services>.

Public Housing Residents

Public Housing Residents: The Town is served by the Douglas County Housing Partnership (DCHP), which is a multi-jurisdictional housing authority that was formed as a cooperative effort among businesses, and local and county governments to address affordable housing needs for people who work in the area. The DCHP owns Oakwood Senior Apartments in Castle Rock, which provides 109 units for seniors. The Town also allowed fee waivers for the Meadowmark project, which will provide additional affordable units for Town residents.

Additionally, the Town is supporting DCHP with the Proposition 123 affordable housing initiative, which dedicates 0.1% of the state annual revenue to a variety of affordable housing programs, such as land banks and down payment assistance. Through this effort, the Town has pledged to work to secure about 270 affordable housing units by the end of 2026. The Town will continue to partner with the DCHP and other Douglas County municipalities to work as a region to increase affordable housing units across the county. For more information, see: <https://douglascountyhousingpartnership.org>.

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

The Town currently does not have specific measures in place to facilitate the transition of homeless individuals to permanent and independent living. This includes efforts to shorten periods of homelessness, improve access to affordable housing for the homeless, and prevent relapse into homelessness. Residents of the Town who are homeless or at risk of homelessness can apply for the Housing Stability Program offered by the Douglas County Department of Community Services. Due to limited CDBG funds, the Town's initiatives primarily focus on prevention through public service activities.

The Town refers its homeless needs to the MDHI, the Continuum of Care (CoC) in the wider region. MDHI has a wide array of services and housing programs that meet the needs of the homeless and their unique situations. Town residents are also eligible for Douglas County's Housing Stability Program.

Within Castle Rock, the Town continues to use CDBG funds to work directly to benefit LMI individuals and households in the community and address homelessness by providing services that directly or indirectly

work to prevent poverty or conditions that may lead to homelessness. In the 2024 program year, the Town used CDBG funds for the Senior Center Home Meal Delivery program, which targeted elderly and disabled populations.

Additionally, the Town has access to the Douglas County Cares program, which is comprised of County and local partner agencies, which work in partnership for the benefit of homeless and vulnerable residents. This program involves case management as well as other supportive services to increase the client's chances of obtaining and maintaining self-sufficiency. A variety of assistance, services, and tools are made available to participants to overcome barriers to achieving stability, capacity, capability and opportunity, including assistance with the transition to permanent housing and independent living.

A current example of these services is the Generational Opportunities to Achieve Long-term Success (GOALS) initiative. As the result of a \$1 million federal grant, Douglas County partnered with Arapahoe County and Family Tree to bring the GOALS program to Douglas County.

GOALS offers families a safe, private living space for four to nine months, plus an additional year of follow-up support. The program uses a whole family approach, meaning services are designed to address the needs of parents and children simultaneously. This model helps break the cycle of homelessness and poverty.

GOALS is designed specifically for families experiencing homelessness by providing temporary housing and comprehensive wrap-around services for up to five Douglas County Families at a time.

CR-30 - Public Housing 91.220(h); 91.320(j)**Actions taken to address the needs of public housing**

The Town of Castle Rock does not have any traditional public housing units. However, the Douglas County Housing Partnership (DCHP), the local public housing authority, owns and manages several affordable properties in the area. These properties include Oakwood Senior Apartments, Reyn Rock Senior Apartments, Stonecreek Park Condominiums, Auburn Ridge, The Reserve at Castle Highlands, and Meadowmark. DCHP is committed to maintaining affordable housing options in the Town and addresses the needs of residents through continuous maintenance and upkeep of these units.

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

DCHP operates several programs to improve the living environment of residents and to help them participate in homeownership. They provide down-payment assistance, homebuyer education classes, foreclosure mitigation counseling, reverse mortgage counseling, and rental units.

Actions taken to provide assistance to troubled PHAs

N/A. There are no troubled PHAs in the Town of Castle Rock.

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

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

The Town of Castle Rock developed the 2030 Comprehensive Master Plan that was intended to provide direction for the short-term and long-term growth and development of the Town. At the time of the 2030 Comprehensive Master Plan publishing, findings include an estimated population of 90,000 by 2030 and an ultimate Town build-out of approximately 130,000 to 150,000 residents. Upon further study, the Town now estimates up to 120,000 to 140,000 total residents. Castle Rock plans for responsible development that accommodates the needs of LMI households. The public policies deriving from the Town's vision do not inherently exacerbate the challenges to affordable housing and seek to mitigate those barriers. One example is Section 3.16.050 of the Town's Municipal Code which specifically addresses "Attainable housing fee reduction." The Town waived \$661,365 for the Wellspring multi-family residential housing project and \$500,000 for Meadowmark in 2023. In May 2025, the Town waived \$538,640.27 in fees for the Wellspring project to provide housing units for individuals with disabilities, especially those with intellectual and developmental disabilities (I/DD). The most critical barriers to the production and preservation of affordable housing include the following: Current Market conditions and limited resources.

Current Market Conditions: Castle Rock population is on a long-term trend of growth, creating a rise in demand for housing. However, its real estate market has not kept pace with the growth rate, so the amount of affordable housing stock has not increased with the same intensity. Further, the increase in new construction costs, housing prices, and higher rent contracts compared to limited growth in household income has proven to be a major challenge for affordable housing in the Town. Current housing trends have attracted developers to supply production for middle to higher-income households, which increases the property values of surrounding homes and parcels. Affordable housing development becomes more difficult to produce as the market conditions advance. While development has slowed over the past year, the Town continues to support a wide range of development types, including paired-homes, ADUs, and more. There has been an increase in multifamily development in recent years.

Limited Funding to Address Affordable Housing Needs: There is a need for available, accessible, and quality affordable housing in Castle Rock. Limited financial resources to address affordable housing will impact future access and availability. The Town will continue to effectively manage the available resources to maximize its effect to promote affordable housing. The Master Plan identified "Responsible Growth" as a key housing and residential investment-related finding in Castle Rock, as quoted below:

Responsible Growth (RG): the needs of existing and future residents while enhancing the Town's own character, maintaining a distinct identity, and ensuring we remain a vibrant freestanding community within the region. Below is a selected list of principles for responsible growth that will help mitigate barriers to affordable housing and promote affordable housing development. Detailed implementation

strategies are provided in the 2030 Master Plan.

RG Principles:

- Cohesive neighborhoods, with a mix of land uses, offer a variety of lifestyle options for Castle Rock residents. They meet the short- and long-term needs of the community while creating a place where people can live, work, and play.
- Orderly, cost-effective, equitable, and fiscally responsible growth.
- Infill development is sensitive to the scale and character of the surrounding neighborhoods.
- Continue to secure a renewable water supply to serve the long-term needs of the community.

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

The activities outlined in the 2024 AAP aimed to address the needs of low-to-moderate-income (LMI) and special needs populations, particularly the elderly and disabled. The Town continues to utilize Community Development Block Grant (CDBG) funds to support elderly households and provide services that help prevent poverty and homelessness. In the 2024 program year, the Town funded a meal delivery service that provided essential meals to 292 elderly residents. The CDBG-funded programs will build on these successful initiatives, with the objective of bridging service gaps and meeting underserved needs.

Furthermore, the Town is committed to improving access to public facilities through Americans with Disabilities Act (ADA) enhancements in LMI areas. Plans are also in place to fund future public infrastructure improvements that will benefit LMI communities, including upgrades to streets, sidewalks, and public facilities. The CDBG funding for improvements in these areas not only addresses the community's underserved needs but also aims to attract additional private and public investments.

Town supportive services include independent living services and health and self-sufficiency assistance for the elderly. Funding may also be used to provide services for the disabled, youth, and vulnerable population groups while offering job training, emergency assistance and health services. For more information, citizens could reach the Town through the program's webpage at: <https://crgov.com/3212/CDBG>

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

The Town does not engage in affordable housing projects and, as a result, does not address lead-based paint hazards. Castle Rock has a low percentage of housing units that may contain lead-based paint. Most of the Town's housing stock was constructed after 1978, when lead-based paint was banned for consumer use nationwide. However, residents with homes built before 1978 may risk exposure to lead-based paint during home repair projects. The Town does not offer lead-based paint services but refers cases to the Douglas County Health Department if children are exposed.

As instructed by the Douglas County Health Department website, when a child has a confirmed blood lead level greater than or equal to 5µg/dL, Douglas County Health Department will conduct an investigation

which could include a home visit. These services are free of charge, and households with this need can contact the department at 720-643-2400 for more information.

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

The activities in PY 2024 worked directly and indirectly to reduce the number of poverty level families in Castle Rock. The Town funded the Castle Rock Senior Activity Center's Home Delivery of Hot Meals program to assist 292 elderly persons during the program year. The program targeted the most socially isolated and those in the most economic need as all beneficiaries were low- to moderate- income (LMI). These vital services can help off-set everyday costs of other basics needs such as medical and housing costs.

CDBG funds are limited, and the Town of Castle Rock cannot address every poverty issue. However, the Town is committed to utilizing these funds where they will have the greatest impact. Future allocations will focus on supportive services for low-to-moderate income (LMI) individuals and special needs groups, such as the elderly, as well as improving public facilities and infrastructure to benefit these populations. Supportive services may include independent living assistance, health services, and self-sufficiency programs. The goal is to help elderly residents remain in their homes and maintain a high quality of life.

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

The Town worked to develop its institutional structure by working closely with other Town departments and programs such as the Town's Parks and Recreation Department, Public Works Department, Castle Rock Senior Center, and senior resources programs. Ongoing communication and planning with these Town departments and programs help strengthen the institutional structure of the CDBG program. Currently, the Town institutional structure includes these agencies and organizations that deliver services to residents in Castle Rock:

Public Services (LMI & Non-Homeless Special Needs): Castle Rock Senior Center, Castle Rock Parks and Recreation Department, Castle Rock Water, Metro Denver Health Initiative, Douglas County and Douglas County Health Department

Public Facilities & Infrastructure Improvements: Castle Rock Public Works Department and Douglas County

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

The Town has established a process that involves various public and private housing and social service agencies to coordinate the CDBG program. In creating the Consolidated Plan, the Town collaborated with Douglas County to conduct a stakeholder survey. This survey allowed organizations to contribute their input on the funding priorities for the program. The feedback from the survey formed the foundation for the priority needs outlined in the Town's 5-Year Strategic Plan. The Town will continue to engage with

these stakeholder organizations throughout the planning period. Additionally, the Town has hosted several public meetings to share information about the CDBG program, including eligible activities and the use of funds. These meetings will continue in future program years to strengthen the capacity of Town stakeholders.

As mentioned above, the Town continually works to develop its institutional structure by working closely with other Town departments and programs such as the Town's Parks and Recreation Department, Public Works Department, Castle Rock Senior Center and senior resources programs. Ongoing communication and planning with these Town departments and programs will help strengthen the institutional structure of the CDBG program.

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

As of 2021, the Town of Castle Rock became a new entitlement jurisdiction, and the Town is in the process of planning the development of its' Analysis of Impediments to Fair Housing Choice (AI) and has not yet developed the assessment.

CR-40 - Monitoring 91.220 and 91.230

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

Monitoring is intended to review funded projects in Castle Rock that address one or more of HUD's national objectives, specifically benefitting low-to-moderate income individuals. This includes the Town's initiatives related to public improvements and public services. The purpose of monitoring is to evaluate regulatory performance in the administrative, financial, and programmatic aspects of the Town's Community Development Block Grant (CDBG) program.

The Town of Castle Rock views monitoring as an ongoing process that involves continuous communication with the Community Development team and other Town departments regarding the evaluation of financial records and project or program performance. This process includes frequent communication via telephone and email, written correspondence, analysis of reports and audits, and periodic meetings. It is the responsibility of Town staff to stay fully informed about compliance with program requirements and to assess the level of technical assistance needed by and provided to any manager of CDBG program funds.

Monitoring of projects consists of both desktop and on-site reviews and is conducted as needed. Through on-site and desktop monitoring, the Town CDBG program can determine whether the project performance meets program requirements and improve performance by providing guidance and making recommendations.

The Town monitors CDBG expenditures and IDIS cash disbursements. The Town ensures that all project expenses are correctly added and coded and the Town's recorded revenues match cash disbursements in HUD's IDIS reporting system. The Town tracks and reviews expenditures of activities and reports all activities in the Consolidated Annual Performance and Evaluation Review (CAPER) at the end of the program year. Further, the Town monitors timeliness of expenditures of program funds. Timely tracking and reviewing activities expenditure information helps to monitor the progress and successful completion of activities.

Comprehensive Planning Requirements

The comprehensive planning requirements include the development and consolidated plan process of the 5-Year ConPlan, the AAP, and CAPER. Citizen participation is a vital part of the Consolidated Plan process and the Town closely follows its HUD approved Citizen Participation Plan (CPP) which helps guide the Town to gather information, an essential component in identifying the priority housing and community development needs in Castle Rock. These priority needs form the basis of the Town's Strategic Plan in the ConPlan and annual goals and activities carried out in each subsequent AAP. The ConPlan is developed every 5 years, with identified priority needs and goals to address these needs. Each year of the 5-Year plan, the Town develops an AAP which identifies the projects and activities that will address and further the goals of the plan. This plan is required to be submitted to and approved by HUD each year to receive

CDBG funding annually. At the end of each AAP program year, the Town will report on the accomplishments and performance of the program through the CAPER. Citizen participation is required in the development of each of these stages as per 24 CFR 91.105.

Citizen Participation for the PY 2024 AAP

A public hearing was scheduled for May 28, 2024 at 4:30 PM at Town Hall to discuss the community development needs of the Town. Community stakeholders were all invited, including department staff, town staff, parks & recreation, the police department, and the Castle Rock Senior Center. A 30-Day Public Comment Period was advertised in the Castle Rock News Press informing residents of the available comment period from May 29, 2024 to June 28, 2024. Copies of the AAP were available for review and comment on the Town website, in the Town Hall lobby, and at the Philip and Jerry Miller Library. There were no comments made at the public hearing or during the public comment period.

Executive Order Compliance

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

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

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

The Town of Castle Rock, through its citizen participation process, allows for adequate opportunity for residents of the Town to provide input and make comments on the PY 2024 CAPER as per the requirements in 24 CFR 91.105. The following details are provided on how citizens could participate in the development of this year's CAPER.

PUBLIC COMMENT PERIOD: Citizens can review and make comments on the draft 2024 CAPER. The draft CAPER will be available for (15) fifteen days from **November 11, 2025 to November 25, 2025**. The draft CAPER will be available at Town Hall, located at 100 N Wilcox St, Castle Rock, CO 80104, or it can be viewed on the Town's website at: crgov.com/CDBG. Written comments are encouraged and can be mailed or delivered to the address above or via email to BBland@crgov.com.

PUBLIC HEARING: A public hearing will be held to review and discuss the draft 2024 CAPER. The hearing will be held on **November 10, 2025 at 4:30 PM** and will take place in Town Hall, located 100 N. Wilcox St. Castle Rock, CO 80104. The meeting is open to the public and all persons are welcome.

Disability & ADA Compliance: The Town of Castle Rock will make efforts to provide all reasonable accommodations to disabled members of the public in accessing the Town's programs and public

meetings in accordance with Title II of the Americans with Disability Act (ADA) and Section 504 of the Rehabilitation Act of 1973. Please contact the Assistant Town Manager Kristin Read, serving as the Town's ADA coordinator, by phone at (720) 733-3552 or by email at kread@CRgov.com at least two business days in advance for special accommodations. A reasonable accommodation request form can also be made at: <http://www.crgov.com/FormCenter/Facilities-and-ADA-Compliance-14/Reasonable-accommodation-request-form-112>

With at least two business days advanced notice, Spanish translators will be provided at public meetings. Translation services will also be provided for persons who may need assistance reviewing printed materials. Citizens may contact the Town of Castle Rock at 720-733-3552 at least two business days in advance to request such services.

CR-45 - CDBG 91.520(c)

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

PY 2024 is the fourth year of the Town's 2021-2025 Consolidated Plan, and there were no changes to the overall goals and outcomes of the plan. The Town remains committed to fulfilling its community development program objectives as established in the 2024 Annual Action Plan (AAP) and 5-Year Consolidated Plan. The priority needs in the Town of Castle Rock continue to focus on improvements to public facilities and infrastructure, as well as supportive services for low-to-moderate-income (LMI) individuals and those with special needs.

If there are any changes to the priorities or program objectives, the Town will properly document the changes and take the proper steps to make substantial amendments necessary to add these changes to the program.

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

No

CR-58 - Section 3**Identify the number of individuals assisted and the types of assistance provided**

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

Table 8 – Total Labor Hours

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

Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses.	0
Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act.	0
Other.	0

Table 9 – Qualitative Efforts - Number of Activities by Program

Narrative

This section reports on the requirements for Section 3 under 24 CFR 75 for construction activities assisted under HUD grant programs that provide housing and community development. Section 3 helps to establish more economically sustainable communities by ensuring that employment and other economic opportunities generated by Federal assistance for development programs are directed towards very low- and low-income persons to the greatest extent possible, and in particular to those who are recipients of the Federal assistance. The Final Rule changes tracking the number of qualified new hires in Section 3 projects, to tracking the total labor hours worked. HUD made this Final Rule effective on October 29, 2020.

The benchmark for Section 3 workers was set by HUD at 25 percent or more of the total number of labor hours worked by all workers on a Section 3 project. The benchmark for Targeted Section 3 Workers was set at 5 percent or more of the total number of labor hours worked. Section 3 Projects cover housing rehab/construction and public improvement construction activities assisted under HUD grant programs that provide housing and community development financial assistance which exceed a threshold of \$200,000. A \$100,000 project threshold applies to grants under HUD's Lead Hazard Control and Healthy Homes programs. The Town did not have any activities that met the Section 3 threshold in PY 2024. As the Town's annual allocation is quite small, for example \$264,043 in PY 2024, the Town does not anticipate many activities funded by the Town to meet the reporting threshold for Section 3.