



## 2024 Annual Action Plan

**DRAFT**

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

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## Executive Summary

### AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

The Town of Castle Rock strives to provide a suitable living environment, especially for low- to moderate-income (LMI) households and special needs communities. In 2021, the Town became a U.S. Department of Housing and Urban Development (HUD) entitlement community, enabling it to be eligible for federal Community Development Block (CDBG) funds allocated through HUD's Community Planning Development program. The Town's CDBG program administers CDBG grant funds and ensures compliance with HUD regulations and guidelines. These funds will help the Town address the community development objectives outlined by HUD, which include, but are not limited to, affirmatively furthering fair housing, affordable housing activities, public infrastructure and facilities improvements, and public services for low- to moderate-income households and the special needs community.

The PY 2024 Annual Action Plan describes the eligible activities that will work towards accomplishing the goals established in the strategic plan. By addressing the identified priority needs, the Town will improve the quality of life of residents in Castle Rock.

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

The Annual Action Plan describes the eligible activities that will work towards accomplishing the goals established in the strategic plan. CDBG funds are being used to fund the administration of the grant, supporting public services for senior citizens, LMI, and other special needs populations, and improving ADA accessibility in public spaces. By addressing the identified priority needs, the Town will improve the quality of life of residents in Castle Rock. The following priorities and associated goals have been identified in this plan:

##### Priority Need 1: Improvements to Public Facilities & Infrastructure

1A Improve Access to Public Facilities (ADA): Improve access to public facilities that will benefit LMI persons and households. Activities include improved access to community centers, neighborhood facilities, and park facilities. These activities will primarily benefit populations that are presumed to be low/moderate income and/or areas where there is a majority low/moderate income population.

- Objective: Creating Suitable Living Environments
- Outcome: Availability/Accessibility
- Goal Outcome Indicator: 2985 Persons Assisted

1B Improve Capacity of Public Infrastructure LMI: Improve and expand the capacity of public infrastructure through activities such as the expansion of streets, sidewalk improvements, and ADA

improvements. These activities will primarily benefit populations that are presumed to be low/moderate income and/or areas where there is a majority low/moderate income population.

- Objective: Creating Suitable Living Environments
- Outcome: Availability/Accessibility
- Goal Outcome Indicator: 2985 Persons Assisted

### **Priority Need 2: Supportive Services for LMI and Special Needs**

2A Provide Supportive Services for Seniors: Provide supportive services for the elderly population in Castle Rock. This may include elderly health and wellness programs and meal services.

- Objective: Creating Suitable Living Environments
- Outcome: Availability/Accessibility
- Goal Outcome Indicator: 50 Persons with public services

2B Provide Supportive Services LMI & Special Needs: Provide supportive services for LMI and special needs populations in Castle Rock. Vital services for LMI persons may include health, employment, and education services. The special needs groups include the elderly, persons with a disability, homeless, and victims of domestic violence.

- Objective: Creating Suitable Living Environments
- Outcome: Availability/Accessibility
- Goal Outcome Indicator: 50 Persons with public services

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

The Town of Castle Rock is an entitlement community as designated by HUD and received federal CDBG funds for the first time in PY 2021. As a recipient of HUD CDBG funding, the Town has been able to address additional needs of the elderly community and persons with a disability with ADA improvements. The Town has been successful in providing services that benefit the senior population in Castle Rock; however, to expand upon existing services by the Town and local community organizations identified, there is a need for increased funding and leverage of new resources. Public services and public infrastructure and facility improvements and expansion have been identified as ongoing needs in the community as documented in this plan, the Town's 5-Year Strategic Plan, and the Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER provides an assessment of progress towards the five-year goals and the one-year goals of the CDBG program. The most recent PY 2022 CAPER reports the following highlights by priority:

Public Facilities and Infrastructure Improvements: In PY 2021 the Town completed the Butterfield Park improvement activity with the remodel of an existing restroom to be ADA accessible. This activity was already reported in the previous CAPER. There were no new activities started in PY 2022. However, the

Town is currently planning a project to install new ADA pool lifts at a public pool. Additionally, the Town is planning to make ADA improvements to the exterior of the Historic Cantril School Building. Construction of these improvements will occur after the design is completed later in 2024. The Town will continue to prioritize facility improvements as accessibility enhancements allow all residents to equally enjoy the Town's parks, community centers, and recreational facilities.

**Supportive Services:** The Town continued to fund the Castle Rock Senior Activity Center's Home Delivery of Hot Meals program, which assisted 229 LMI elderly persons throughout the program year. The program targeted the most socially isolated and those with the most economic need, as all beneficiaries were LMI. This activity is associated with the PY 2021 AAP, and therefore, the accomplishments are included in the Strategic Plan goal outcomes. This is in addition to the 57 LMI elderly reported in the previous CAPER. This puts the Town on track to meet its Strategic Plan goal of 500 LMI persons assisted over the five-year period.

#### **4. Summary of Citizen Participation Process and Consultation Process**

The Town encourages participation by all citizens, with particular emphasis on LMI households and those with special needs to participate in the PY 2024 Annual Action Plan process. The Town follows its HUD-approved Citizen Participation Plan and has developed a formal process for gathering input from citizens and community stakeholders in the 2021-2025 Consolidated Plan and 2024 AAP.

A public hearing was held to gather input from the community regarding community development needs and priorities. Community stakeholders were all invited, including department staff, town staff, parks & recreation, the police department, and the Castle Rock Senior Center. A public comment review period was also held and allowed the public to review and comment on the PY 2024 AAP.

Details of the citizen process are located in the AP-12 Participation section of this plan.

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

**Public Hearing (May 28, 2024):** A summary of comments will be included after the public hearing.

**Public Comment Period (May 29, 2024 to June 28, 2024):** After the public comment period, a summary of comments will be included.

All comments are accepted. There will be no individuals, organizations or agency types not intentionally consulted.

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

All comments are accepted. There will be no individuals, organizations or agency types not intentionally consulted.

## 7. Summary

PY 2024 is the fourth planning year of the 2021-2025 Consolidated Plan. The Town will continue to fund high-priority projects in accordance with the goals and objectives outlined in the Consolidated Plan. Priority needs of the Town identified in the Consolidated Plan were developed through a comprehensive citizen participation outreach effort, which included a series of community needs assessment meetings, a community survey that was offered online, a stakeholder survey for community nonprofit organizations, consultation by nonprofit partners and regional service partners; and finally a review of the needs assessment and housing market analysis in this plan. These priority needs were affirmed through community input and public hearings during the development of the PY 2024 AAP.

### *Analysis of Impediments to Fair Housing Choice*

The Town of Castle Rock does not currently have an Analysis of Impediments to Fair Housing Choice (AI). However, the Town is planning for the development of a new Equity Plan for the upcoming ConPlan cycle. Though public policies are meant to address the overall needs of citizens in the area, there are times when they may have a negative effect on certain aspects of the community, which, in this case, are affordable housing and residential investment. Affordable housing and public and private residential investments are key components in furthering fair housing in any community. The Equity Plan seeks to identify contributing factors that lead to the issues identified above. With the development of the Equity Plan, the Town will be able to inform residents, stakeholders, and policymakers on affirmatively furthering fair housing and to identify the major impediments to fair housing choice and barriers to affordable housing.

**PR-05 Lead & Responsible Agencies – 91.200(b)****1. Agency/entity responsible for preparing/administering the Consolidated Plan**

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

<b>Agency Role</b>	<b>Name</b>	<b>Department/Agency</b>
CDBG Administrator	TOWN OF CASTLE ROCK	CDBG Program

**Table 1 – Responsible Agencies**

The Town of Castle Rock was designated a new entitlement community by HUD in 2021 and receives federal Community Development Block (CDBG) funds allocated through HUD's Community Planning Development program. These funds are intended to primarily serve low- to moderate-income households and special-needs communities. The Town's CDBG program administers CDBG grant funds and ensures compliance with HUD regulations and guidelines.

**Consolidated Plan Public Contact Information**

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

### **1. Introduction**

The PY 2024 AAP identifies in this section the organizations consulted in the development of the Plan. The organizations listed in the table below represent key stakeholder organizations which consist of nonprofits, government departments and agencies, and planning organizations in Castle Rock.

### **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))**

The Town of Castle Rock is building on the initial ConPlan with the PY 2024 AAP, targeting specific agencies that could benefit from the Town’s limited funding award. This included a shared list of community stakeholders specific to Castle Rock, including local nonprofits, other Town and government departments, and other agencies. This helped ensure that participation efforts were not duplicated and that community needs were accurately recorded.

The Town works with the Douglas County Housing Partnership (DCHP) to explore options for supporting affordable housing in Castle Rock through programs such as homebuyer education classes, down payment assistance, and foreclosure mitigation. The Town plans to continue to look for ways to collaborate with the DCHP.

### **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.**

The Metro Denver Homeless Initiative (MDHI) is the Continuum of Care for the seven-county Denver metro area, which includes Douglas County. MDHI is responsible for coordinating with all seven counties and the various local homeless service providers. The Town of Castle Rock benefits from the coordinated efforts of the Continuum of Care through referral of resources, connections to homeless prevention initiatives in the region, and access to resources not found locally in the Town. Douglas County also has the Douglas County Homeless Initiative (DCHI) Executive Committee, where municipal and county leaders, as well as community leaders, provide strategic guidance on DCHI direction.

In Douglas County, the County Community of Care Coordinator coordinates with MDHI to collect data on the unhoused populations through two events: the Point-in-Time (PIT) Count, and the Community of Care Network’s “Strive to Thrive” event. At Strive to Thrive, the county partners with local food pantries to provide food and increase awareness of community resources. This event typically takes place twice each year, in January and July.



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

The Town of Castle Rock is not a recipient of HUD's Emergency Solutions Grant (ESG). MDHI coordinates the distribution of ESG funds, along with other HUD funding sources, to provide supportive services and permanent-supportive housing to prevent homelessness. HMIS is the system used for administering the ESG program. While the Town of Castle Rock does not use the HMIS system, the Town benefits from MDHI's HMIS administration across the region.

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

Table 2 – Agencies, groups, and organizations who participated

1	<b>Agency/Group/Organization</b>	TOWN OF CASTLE ROCK
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs Supportive Services for Seniors
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Town of Castle Rock is the lead responsible agency of the PY 2024 AAP.
2	<b>Agency/Group/Organization</b>	Town of Castle Rock Parks & Recreation
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Improve Access to Public Facilities and improve capacity of public infrastructure
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Parks and Recreation department worked with the Town on public facilities, infrastructure projects, and therapeutic rec services.
3	<b>Agency/Group/Organization</b>	Castle Rock Senior Activity Center
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Supportive Services for Seniors
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization consulted on the needs of the senior citizen community.
4	<b>Agency/Group/Organization</b>	Castle Rock Police Department
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs Supportive Services for Seniors

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Town's PD works with seniors in the community and they were consulted to determine needs and potential opportunities for CDBG funding. Ongoing discussions will occur to identify additional opportunities.
5	<b>Agency/Group/Organization</b>	Castle Rock Fire and Rescue
	<b>Agency/Group/Organization Type</b>	Agency - Emergency Management Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development, Emergency Preparedness
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Town recognizes the importance of disaster preparedness, whether by man-made or natural disasters and has developed the Town of Castle Rock Emergency Operations Plan to prepare for these hazards. As designated in the Emergency Operations Plan, the Castle Rock Fire and Rescue Department is the lead emergency management agency for the Town, with the fire chief serving as the Town emergency manager. An emergency preparedness guide is provided on the department website at: <a href="https://www.crgov.com/1690/Emergency-Preparedness">https://www.crgov.com/1690/Emergency-Preparedness</a>
6	<b>Agency/Group/Organization</b>	Douglas County Libraries
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Quality of Life Improvements
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Douglas County Libraries, Philip and Jerry Miller branch in Castle Rock provides the community with free highspeed internet access. Town staff consulted the Philip and Jerry Miller Library website to confirm that DCPL provides free internet access and access to technology for residents.

7	<b>Agency/Group/Organization</b>	Douglas County Homeless Initiative
	<b>Agency/Group/Organization Type</b>	Services-homeless Publicly Funded Institution/System of Care Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Douglas County Homeless Initiative (DCHI) is the lead agency in the local area providing coordination and services on homeless needs, and reports directly to MDHI, the greater CoC in the region. DCHI provides services such as signage, education, assistance with homelessness and the Homeless Engagement, Assistance and Resource Team (HEART).
8	<b>Agency/Group/Organization</b>	Douglas County Housing Partnership
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Town continues to be engaged with DCHP and continues to look for ways to collaborate with this group.
9	<b>Agency/Group/Organization</b>	Castle Rock Public Works Department
	<b>Agency/Group/Organization Type</b>	Agency - Management of Public Land or Water Resources Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Town departments work closely to discuss the needs of citizens in Castle Rock. Among some needs identified through the Public Works department is the need to address downtown ADA non-compliance; and a downtown ADA transition plan.
10	<b>Agency/Group/Organization</b>	Castle Rock Town Manager's Office
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Housing Community Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Town Managers Office works closely with the CDBG program and is provided regular updates of the program. The office also has a multi-year plan for newly acquired property and plans opportunities for ADA accessibility.

### Identify any Agency Types not consulted and provide the rationale for not consulting

All comments were welcome. There were no agency types intentionally not consulted.

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

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Metro Denver Homeless Initiative	MDHI is the local Continuum of Care (CoC) in the region. MDHI and Town of Castle Rock share the goal to end homelessness in the region; the CoC helped to inform the homeless initiatives in the plan.
Emergency Operations Plan	Town of Castle Rock	The Town of Castle Rock Emergency Operations Plan provides the Town residents with information on how to prepare for disasters, whether man-made or natural, and describes the agencies responsible in times of emergencies.

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

### Narrative

The Town of Castle Rock will plan in collaboration with local public, private and nonprofit agencies as the CDBG program continues to grow and expand to meet the needs of the community. These organizations

will include nonprofits and social service agencies. The CDBG Program currently works closely with the Town departments to design programs that work to address needs as they are identified in Castle Rock.

**AP-12 Participation – 91.105, 91.200(c)****1. Summary of citizen participation process/Efforts made to broaden citizen participation  
Summarize the citizen participation process and how it impacted goal-setting**

The Town of Castle Rock's citizen participation process adheres to HUD's requirements set within the Town's Citizen Participation Plan. This plan includes gathering participation from all Town residents, particularly low- and moderate-income persons, and the special needs community, such as the elderly and those with disabilities. The plan also consulted other department staff, the Parks and Recreation department, and other local stakeholders for input on the community development needs and funding priorities.

Citizen participation efforts for the development of the PY 2024 AAP included a 30-day public comment period to allow members of the public to review and comment on the draft plan and a public hearing to review and discuss the plan. Copies of the draft plan were made available online, in the lobby of Town Hall, and at the Philip and Jerry Miller Library. All comments from the public were welcome.

## Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	A public hearing has been scheduled for <b>May 28, 2024</b> at Town Hall to discuss the community development needs of the Town.	A summary of comments will be included after the public hearing.	All comments are welcome.	<a href="https://crgov.com/cdbg">https://crgov.com/cdbg</a>
2	30-Day Public Comment Period	Non-targeted/broad community	The 30-Day Public Comment Period was advertised in the Castle Rock NewsPress informing residents of the available comment period from <b>May 29, 2024 to June 28, 2024</b> . Copies of the AAP are available for review and comment on the Town's website, in the Town Hall lobby, and at the Philip and Jerry Miller Library.	A summary of comments will be included after the public comment period.	All comments are welcome.	<a href="https://crgov.com/cdbg">https://crgov.com/cdbg</a>

Table 4 – Citizen Participation Outreach



## Expected Resources

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

#### Introduction

The Town of Castle Rock will receive CDBG funds from HUD to help address the goals outlined in the Consolidated Plan. In PY 2024, the Town anticipates receiving \$264,043 in CDBG funds for its community development projects. PY 2024 is the fourth planning year of the 2021-2025 Consolidated Plan, and the Town anticipates one more year (1x) of funding similar to the annual allocation.

#### 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	264,043	0	0	264,043	264,043	PY 2024 is the fourth year of ConPlan period. The expected amount available remainder of the ConPlan is calculated at 1x more year of the annual allocation.

Table 5 - 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**

The Town of Castle Rock will seek to use its federal CDBG funds to leverage additional resources. Currently, CDBG funding will leverage in-kind resources and program activities for Castle Rock seniors from the Castle Rock Senior Activity Center. HUD CDBG program funds do not require a dollar-for-dollar match.

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

The Town has a priority to improve public facilities and infrastructure in LMI areas of Castle Rock. The public improvements identified are sidewalks, streets, trails, Town Parks, and Town-owned facilities. This priority was identified through the citizen participation process and community and stakeholder surveys during the development of the plan. The Town will target Town-owned parks, streets, trails, and sidewalks in low/mod block group tracts in Castle Rock. According to HUD's CDBG Low Mod Income Summary Data (LMISD), the Low/Mod Block Group Tracts are 0140121, 0141232, 0144033, 0145031, 0145041, 0145042, 0145052, and 0145053.

For more information on how these tracts are determined, see the SP-10 of the ConPlan.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	1A Improve Access to Public Facilities (ADA)	2021	2025	Non-Housing Community Development		Improvements to Public Facilities & Infrastructure	CDBG: \$85,815	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2985 Persons Assisted
2	1B Improve Capacity of Public Infrastructure LMI	2021	2025	Non-Housing Community Development		Improvements to Public Facilities & Infrastructure	CDBG: \$85,815	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2985 Persons Assisted
3	2A Provide Supportive Services for Seniors	2021	2025	Non-Homeless Special Needs		Supportive Services for LMI and Special Needs	CDBG: \$19,803	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted
4	2B Provide Supportive Services LMI & Special Needs	2021	2025	Non-Homeless Special Needs		Supportive Services for LMI and Special Needs	CDBG: \$19,802	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted

Table 6 – Goals Summary

**Goal Descriptions**

<b>1</b>	<b>Goal Name</b>	1A Improve Access to Public Facilities (ADA)
	<b>Goal Description</b>	The Town will work to provide improved access to public facilities, in particular for ADA improvements to neighborhood facilities (03E), parks and recreation facilities (03F), and ADA improvements to parking facilities (03G). These may include activities such as wheelchair access, ramps and signs.
<b>2</b>	<b>Goal Name</b>	1B Improve Capacity of Public Infrastructure LMI
	<b>Goal Description</b>	The Town will work to provide support for public infrastructure improvements such as street improvements (03K), sidewalks (03L), water and sewer improvements (03J) and ADA and other infrastructure improvements (03Z). Public improvements are intended to have LMI area wide benefits.
<b>3</b>	<b>Goal Name</b>	2A Provide Supportive Services for Seniors
	<b>Goal Description</b>	The Town will work to provide for supportive services that improve the quality of life for the elderly living in Castle Rock. Supportive service activities for seniors include activities such as independent living services, meals, health, and self-sufficiency assistance (05A).
<b>4</b>	<b>Goal Name</b>	2B Provide Supportive Services LMI & Special Needs
	<b>Goal Description</b>	The Town will work to provide vital support services that improve the quality of life for low- and moderate income (LMI) households and special needs groups in Castle Rock. Public Services that are intended to help assist LMI and special need residents include activities such as services for persons with a disability (05B), emergency assistance (05Q) and health services (05M).

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The proposed projects for the PY 2024 AAP are listed in the table below. The projects will address the town's two highest priority needs: Improvements to Public Facilities and infrastructure and Supportive Services for LMI and Special Needs. Administration of the CDBG program is capped at 20% of the CDBG 2024 funding allocation, as are public services, which have a grant cap of 15%. Details of the proposed projects are located in the following AP-38.

#### Projects

#	Project Name
1	Program Administration (2024)
2	Public Services (2024)
3	Public Facilities & Infrastructure (2024)

**Table 7 - Project Information**

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

The projects address the two highest priority needs in the Town which are Improvements to Public Facilities & Infrastructure and Supportive Services for LMI and Special Needs. While they are both high priorities, there is a grant allocation cap for public services at 15%. The remaining funds (beyond the public service and planning and administration caps) will go towards public facilities and infrastructure improvements. At this time, limited funds are an obstacle to addressing the underserved needs in the community.

**AP-38 Project Summary****Project Summary Information**

<b>1</b>	<b>Project Name</b>	Program Administration (2024)
	<b>Target Area</b>	
	<b>Goals Supported</b>	1A Improve Access to Public Facilities (ADA) 1B Improve Capacity of Public Infrastructure LMI 2A Provide Supportive Services for Seniors 2B Provide Supportive Services LMI & Special Needs
	<b>Needs Addressed</b>	Improvements to Public Facilities & Infrastructure Supportive Services for LMI and Special Needs
	<b>Funding</b>	CDBG: \$52,808
	<b>Description</b>	Administration and planning of the Town CDBG program in PY 2024. Admin costs are not to exceed 20% of the total annual allocation.
	<b>Target Date</b>	9/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	Town-wide
	<b>Planned Activities</b>	Program administration of the CDBG program (21A)
<b>2</b>	<b>Project Name</b>	Public Services (2024)
	<b>Target Area</b>	
	<b>Goals Supported</b>	2A Provide Supportive Services for Seniors 2B Provide Supportive Services LMI & Special Needs
	<b>Needs Addressed</b>	Supportive Services for LMI and Special Needs
	<b>Funding</b>	CDBG: \$39,605
	<b>Description</b>	The Town will provide CDBG funds for public service to LMI and special needs groups such as the elderly. Supportive services include senior service activities such as health services, transportation, meal delivery, and recreation programs. Funding for public services is capped at 15% of the grant allocation.
	<b>Target Date</b>	9/30/2025

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
	<b>Location Description</b>	Town-wide, eligible.
	<b>Planned Activities</b>	Planned activities for public services will include senior services, health and self-sufficiency assistance (05A).
3	<b>Project Name</b>	Public Facilities & Infrastructure (2024)
	<b>Target Area</b>	
	<b>Goals Supported</b>	1A Improve Access to Public Facilities (ADA) 1B Improve Capacity of Public Infrastructure LMI
	<b>Needs Addressed</b>	Improvements to Public Facilities & Infrastructure
	<b>Funding</b>	CDBG: \$171,630
	<b>Description</b>	The Town will provide CDBG funds for public facilities and infrastructure improvements to LMI areas in Castle Rock.
	<b>Target Date</b>	9/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5,970 Persons Assisted (This will be based on the block group tract where the activity is located)
	<b>Location Description</b>	Town-wide, low/mod eligible.
	<b>Planned Activities</b>	Planned activities for public facilities and infrastructure improvements will include ADA improvements to neighborhood facilities (03E) and parks and recreation facilities (03F).

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The Town of Castle Rock does not allocate funding based solely on geographic requirements. Individuals or households must receive direct assistance from activities and services in the CDBG program. For eligible activities related to public facilities and infrastructure improvements, the Town will target low- to moderate-income census block group tract areas in need. See below for areas in need. See below for how the Town will determine these areas.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
N/A	N/A

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

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 will serve a specific community or neighborhood. These activities are said to have an “area-wide” benefit for the area of the identified community or neighborhood. 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%. In 2021, eight block groups qualify as Low/Mod in Castle Rock and are as follows:

0140121, 0141232, 0144033, 0145031, 0145041, 0145042, 0145052, and 0145053

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/>

A map of the Low/Mod census block group tracts is displayed in the SP-10 of the Consolidated Plan.



## Discussion

### *Race/Ethnic Minority Concentration*

A “racial or ethnic concentration” is any census tract where a racial or ethnic minority group makes up 10 percent or more of that group’s Town-wide percentage. Data was taken from the 2018-2022 ACS 5-Year estimates. Due to the small sample size, only racial or ethnic groups that make up at least 1.0 percent of the Town’s population were analyzed.

Asian: Approximately 2.2% of the population identifies as Asian. A census tract is considered a concentration if 12.2% of the population is part of this racial group. There are no census tracts with a concentration.

Hispanic: Hispanic persons make up 10.7% of the Town's population, and a census tract is considered a concentration if 20.7% of the population is part of this racial group. There is one census tract with a concentration (08035014407).

### *Low-Income Households Concentration*

A “low-income concentration” is any census tract where the Median Household Income (MHI) for the tract is 80% or less than the MHI for the Town. According to the 2018-2022 ACS 5-Year Estimates, the MHI in Castle Rock is \$135,985. A tract is considered to have a low-income concentration if the MHI is \$108,788 or less. There are four tracts with a concentration of low-income households: 08035014407, 08035014503, 08035014504, and 08035014505. Note: Tract 08035014407 is a “low-income concentration” as well as a “race/ethnicity concentration” of Hispanic persons.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

The Town will not directly fund affordable housing projects with CDBG funding. As funds are limited, the Town will target funds toward the priorities of public services, public facilities, and infrastructure improvements in the 5-Year Consolidated Planning period. The Town anticipates that improvements to public infrastructure, such as streets and sidewalks, will help to draw housing investments to low- and moderate-income areas.

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

**Table 9 – One-Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	0

**Table 10 – One-Year Goals for Affordable Housing by Support Type**

#### Discussion

N/A

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Town of Castle Rock falls within the service area of the Douglas County Housing Partnership (DCHP), a multi-jurisdictional housing authority formed as a cooperative effort between businesses and local and county governments to address the lack of affordable housing for area workers.

DCHP owns existing public housing, including the Oakwood Senior Apartments, a 109-unit senior community located in Castle Rock. The complex was developed under the Rural Development 515 Program. In 2005, the Rural Development loan was pre-paid, and the complex was in danger of being converted to market-rate condominiums. DCHP stepped in and bought the complex, thereby maintaining the affordable rents. DCHP also owns and operates the Reyn Rock Senior Apartments, which provides 33 units for very low-income seniors in downtown Castle Rock. Stonecreek Park Condominiums with 15 affordable units and Reserve at Castle Highlands with 200 units serve the affordable housing needs of LMI families.

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

In early 2023, Castle Rock Town Council granted a \$500,000 fee waiver for the Meadowmark project. Meadowmark will be a 200-flat restricted-rent housing project for people aged 55 and over who meet low-income guidelines. This fee waiver allows the developers to take advantage of low-income residential real estate tax credits from the Colorado Housing Finance Authority and a substantial grant from the Colorado Division of Housing.

The Town of Castle Rock has been working collaboratively with Douglas County, Douglas County Housing Partnership, and Wellspring Community to design a housing solution for adults with intellectual and developmental disabilities (I/DD). The Unity on Park will have 42 units in a multi-family residential affordable housing facility focused on providing supported and independent living for adults with I/DD. This project is currently in the site development planning and permitting stage. The Town approved a full fee waiver for this project.

Town of Castle Rock staff will continue to collaborate with Douglas County Housing Partnership staff on potential opportunities to provide affordable housing for low- to moderate-income individuals.

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

DCHP holds monthly homebuyer classes, and signup is free on its website. DCHP also offers its resident households the opportunity to purchase their first home in Douglas County through the Down Payment Assistance Program. This program increases a buyer's purchase power by allowing these households to borrow at a low-interest rate, ultimately bridging the gap between lower wages and higher-cost housing.

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

N/A. DCHP is not designated as troubled.

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

### **Introduction**

The Town of Castle Rock is located within the Metro Denver Homeless Initiative (MDHI) Continuum of Care area and benefits from the CoC's area initiatives. The Town and MDHI share the goal of ending homelessness in the region, and the Town supports the CoC's homeless initiatives. The CoC covers the seven-county Denver metro area, which includes Douglas County. Douglas County also has the Douglas County Homeless Initiative (DCHI) Executive Committee, where municipal and county leaders, as well as community leaders, provide strategic guidance on DCHI direction.

### **Describe the jurisdiction's one-year goals and actions for reducing and ending homelessness including:**

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

The Metro Denver Homeless Initiative Continuum of Care (CoC) is responsible for coordinating with all seven counties and the various local providers to ensure that the needs of the homeless in the area are met. These activities include supportive services, emergency shelter, transitional housing, and permanent supportive housing to prevent homelessness. HMIS is the system used for administering the CoC services and program funding. While the Town of Castle Rock lacks these resources locally, it may refer for services from the greater CoC area.

Additionally, Douglas County's Homeless Engagement, Assistance, and Resource Team (HEART) is a co-responder team that pairs Navigators with local law enforcement to respond to community calls regarding homelessness. The HEART team provides support and resources to homeless individuals contacted as they arise. This co-responder team strengthens the system of support for those experiencing homelessness.

As mentioned in the NA-40, the Town of Castle Rock is a new entitlement community and is not yet set up to report specific HMIS data. The Town will work to engage with the Metro Denver Homeless Initiative to refer individuals to necessary services. The Town currently has several service providers that reach out to the homeless, 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 people in Castle Rock. Unfortunately, identifying homeless people within the Town is difficult. For a picture of the homeless population, the 2023 PIT Count for the entire county was 72 homeless persons (down from 78 in 2022).

Persons experiencing homelessness in Douglas County can apply for hotel vouchers with the following

agencies: Catholic Charities, Help and Hope Center, Parker Task Force, and SECOR Cares.

**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**

Currently, the Town does not specifically address facilitating the transition of homeless persons to permanent and independent living, shortening periods of homelessness, ensuring access to affordable units for the homeless, and preventing returns to homelessness. With limited CDBG funds, the Town's efforts are focused on prevention through its public service and public facility activities as identified in the AP-35.

The Town refers its homeless needs to MDHI, the Continuum of Care (CoC) in the wider region. MDHI has a wide array of services and programs that meet the needs of the homeless and their unique situations. In addition, during PY 2022, Douglas County was awarded a \$1 million grant from the federal government toward the Generational Opportunities to Achieve Long-term Success (GOALS) facility in Arapahoe County. The funding is being used to provide rehabilitation and construction at an existing unused building on the Arapahoe County GOALS Campus for Douglas County residents. GOALS will be able to accommodate 3-8 families, depending on the size of the family. The facility provides food and shelter, substance abuse treatment, mental health counseling, and job placement for families experiencing homelessness. Lastly, Douglas County has partnered with the City of Aurora to utilize American Rescue Plan Act (ARPA) funding to provide resources and shelter to the County's homeless population through Aurora's Regional Navigation Campus.

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.

Within Castle Rock, the Town will continue to use CDBG funds to work directly to benefit LMI individuals and households in the community. The Town will address homelessness by providing services that directly or indirectly work to prevent poverty or conditions that may lead to homelessness. To align with the goals outlined in the Consolidated Plan, these services are targeted at the elderly population of the Town.

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

**care, and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The Town does not specifically target extremely low- and low-income households to avoid becoming homeless again, including those that are being discharged from public institutions and systems of care or receiving other assistance. The Town's efforts are focused on prevention through its public service activities as identified in the AP-35. However, Douglas County employs a Reintegration Deputy, who assists those being released from county jail. One contributing factor to becoming homeless after being released from jail is the lack of transportation. Released inmates are without transportation to reach the next destination of their choice. The Reintegration Deputy addresses these complex transportation needs as part of their duties, in addition to providing ongoing support after release.

The Town also 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.

Within Castle Rock, the Town will 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 or mitigate poverty and conditions that may lead to homelessness. These services are targeted at the elderly population.

Continued in the Discussion below.

## **Discussion**

Other Special Needs Activities:

**Elderly & Persons With a Disability:** As mentioned above, the Town is focused on improving the quality of life of its elderly and disabled residents. Other supportive activities for the elderly include the efforts outlined in the AP-35, which include planned supportive services such as senior service activities, elderly health services, transportation, and recreation programs. In the fourth-year Annual Action Plan, the Town targets an estimated 100 LMI, elderly, and special needs persons through these public service activities.

The Town makes an effort to provide equal access to the elderly and persons with disabilities at all town-operated community facilities. This includes the Castle Rock Recreation Center, which provides health and wellness activities for all, including the elderly and persons with a disability. There is also a senior fitness program. The center provides a discount for seniors ages 62 years and older.

The Castle Rock Senior Activity Center organizes a wide variety of special events. These may be on-site or

off-site and designed for various purposes, including fundraising, giving back to the community, socializing, or learning something new. Transportation services are also available at the center.

On June 9, 2023, the Town of Castle Rock hosted a grand re-opening of Butterfield Crossing Park. Substantial work was done to create a fully inclusive Possibilities Playground, allowing people of all ages and ability levels to play, be challenged, and have fun together. Achieving the vision for this park was possible through partnerships among Meadows Metropolitan District No. 1, the Castle Rock Parks and Trails Foundation, and the Town of Castle Rock. Nearly \$1.1 million was raised from the community to fund the adaptive and inclusive play equipment bringing the Possibilities Playground to life.

The Possibilities Playground is located next to Butterfield Crossing Pool, an ADA-accessible recreational facility with a lift for individuals with disabilities and a zero-depth-entry wading pool.

Complementing these amenities at Butterfield Crossing Park is the CDBG-funded project (PY 2021) to construct an all-abilities restroom. This Public Facility and Infrastructure project was completed in 2022 and provides residents of all abilities with the functionality they need to enjoy an extended stay at Butterfield Crossing Park.

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

**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 between businesses and local and county governments to address the lack of affordable housing for people who work in the area. Existing public housing owned by DCHP includes the Oakwood Senior Apartments which is a 109-unit senior community located in Castle Rock, Meadowmark which is a 200-unit affordable development for seniors, and Wellspring, which provides an additional 42 units for adults with intellectual and developmental disabilities (I/DD). DCHP also owns and operates 33 affordable units for seniors at Reyn Rock, 15 units at Stonecreek Park Condominiums, and 200 units for LMI families at the Reserve at Castle Highlands. DCHP also offers other kinds of affordable housing and Housing Choice Vouchers (HCV) to eligible individuals and families. For more information, see: <https://douglascountyhousingpartnership.org>.



## AP-75 Barriers to affordable housing – 91.220(j)

### Introduction:

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 project and \$500,000 for Meadowmark in 2023. 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 it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The Town of Castle Rock is planning to develop its Equity Plan, which will help identify any impediments and barriers to affordable and fair housing. Though public policies are meant to address the overall needs of citizens in the area, there are times when they may have a negative effect on certain aspects of the community, which, in this case, are affordable housing and residential investment. Affordable housing and public and private residential investments are key components in furthering fair housing in any community.

With the development of the Equity Plan, the Town will be able to inform residents, stakeholders, and policymakers on affirmatively furthering fair housing and to identify the major impediments to fair housing choice and barriers to affordable housing.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

This section outlines other actions the Town will take to improve the quality of life for Castle Rock residents and address underserved needs in the community. CDBG funds enable the Town to address priority needs in Castle Rock, such as improvements to public facilities and infrastructure in LMI areas and vital supportive services for LMI and special needs groups such as the elderly. Other actions identified in this section are additional resources the Town has to assist vulnerable residents and address underserved needs in the community.

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

The activities identified in this plan will directly address the underserved needs of the LMI and special needs population. The Town will continue to use CDBG funds to benefit elderly households in the community and provide services that directly prevent poverty or conditions that may lead to homelessness. CDBG-funded programs will continue to expand on previously successful programs, and the goal is to fill service gaps.

The Town will also work to address improvements and access to public facilities, such as parks, through ADA improvements in LMI areas. As well, public infrastructure improvements will benefit LMI communities with expansion and ADA improvements to streets and sidewalks. CDBG funding for improvements in these LMI areas will not only help to address underserved needs in the community but also have an added goal to attract other private or public investments into these areas.

Unfortunately, funds to assist LMI and special needs groups limit the Town's ability to address the obstacles to meeting underserved needs. Further, CDBG funding has a 15% grant cap on public services. As identified in the AP-35, the Town estimated it will provide services for 100 LMI and special needs persons in the 2024 Annual Action Plan program year. Planned public services activities will include senior services, health, and self-sufficiency assistance. Additional funds would help the Town expand opportunities for funding additional projects to meet underserved needs in Castle Rock.

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

As funds are limited, the Town will not directly fund affordable housing projects with CDBG funding. Instead, the Town will target funds toward the priorities of public services, public facilities, and infrastructure improvements in the 5-Year Consolidated Planning period. The Town, however, anticipates that improvements to public infrastructure, such as streets and sidewalks, will help to draw housing investments to Low-Income/Moderate-Income areas.

The Town of Castle Rock is planning for the development of the Town's Analysis of Impediments to Fair Housing Choice (AI). Though public policies are meant to address the overall needs of citizens in the area,

there are times when they may have a negative effect on certain aspects of the community, which, in this case, are affordable housing and residential investment. Affordable housing and public and private residential investments are key components in furthering fair housing in any community. The primary tool communities have for identifying these barriers to fair and affordable housing is the AI. As a recipient of HUD federal CDBG grant funds, the Town will continue to work to affirmatively further fair housing in the Town of Castle Rock.

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

Castle Rock has a low percentage of housing units that have the potential for lead-based paint. Most of the Town's housing stock was built after 1978 when lead-based paint was banned nationwide for consumer use. There are, however, still over 900 owner-occupied and almost 600 renter-occupied housing units that were built before 1980 (Source: 2015-2019 ACS). Residents of these homes could risk exposure to lead-based paint during a home repair project. The Town does not provide 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, the 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 (303) 660-7400 for more information.

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

The activities in this plan work directly to reduce the number of poverty level families in Castle Rock. While CDBG funds are limited and the Town cannot possibly address every poverty issue in Castle Rock, the Town will utilize CDBG funds where they have the most impact. Funds will go towards supportive services for LMI and special needs groups such as the elderly and/or disabled. These supportive services may include activities such as independent living services, health, and self-sufficiency assistance. The goal is to help the elderly and disabled remain in their homes and enjoy their quality of life.

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

The Town will continually work to develop its institutional structure by collaborating closely with other Town departments, programs and partners, such as the Parks and Recreation Department, Public Works Department, and Castle Rock Senior Center.

Ongoing communication and planning with these Town departments and programs will help strengthen the institutional structure of the CDBG program. Currently, the Town's institutional delivery 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: Town of Castle Rock Public Works Department and Town of Castle Rock Parks and Recreation.

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

The Town has developed a process that involves the many public and private housing and social service agencies to participate in the coordination of the CDBG program. In the development of the Consolidated Plan, the Town worked with Douglas County to provide a stakeholder survey which gave organizations the opportunity to help determine the funding priorities in the program. This survey helped develop the priority needs identified in the 5-Year Strategic Plan. The Town will continue to consult with these stakeholder organizations during the planning period. The Town also held several public meetings to provide information on the CDBG program and eligible activities and uses of funds. These meetings will continue in future program years to help build the capacity of the Town stakeholders.

The Town will continually work to enhance coordination between public and private agencies by working closely with other Town departments and programs, such as the Parks and Recreation Department, Public Works Department, Castle Rock Senior Center, and senior resources programs. Ongoing communication and planning with these departments and programs will help strengthen the institutional structure and coordination of the CDBG program.

## Program Specific Requirements

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

#### Introduction:

This section describes the program-specific requirements for the CDBG program.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

The Projects Table identifies projects planned with all CDBG funds expected to be available during the year. The following identifies program income that is available for use and included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%