



## **2021-2025 Consolidated Plan**

**DRAFT**

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

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## Executive Summary

### ES-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 of 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.

This 5-Year Consolidated Plan identifies the Town's priority needs through a community needs assessment, a housing market analysis, and an extensive citizen participation and stakeholder consultation process. A strategic plan for the next five years in the plan period is developed and includes goals that will address the identified priority needs of the community.

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

The Town of Castle Rock has developed its strategic plan based on an analysis of the data presented in this plan and the community participation and stakeholder consultation process. Through these efforts, the Town has identified two priority needs and associated goals to address those needs. The priority needs and goals are as follows:

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

##### Goal: 1A. Improve Access to Public Facilities (ADA)

The Town will work to provide improved access to public facilities, in particular for Americans with Disabilities Act (ADA) improvements to neighborhood facilities, parks and recreation facilities, and ADA improvements to parking facilities etc. Public facility improvements are intended to have an LMI area wide benefit.

Goal: 1B. Improve Capacity of Public Infrastructure for LMI

The Town will work to provide support for public infrastructure improvements such as street improvements, sidewalks, water and sewer improvements and ADA and other infrastructure improvements. Public infrastructure improvements are intended to have an LMI area wide benefit.

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

Goal: 2A. Provide Supportive Services for Seniors

The Town will work to provide for supportive services that improve the quality of life for the elderly living in Castle Rock. Supportive services include activities such as independent living services, health and self-sufficiency assistance.

Goal: 2B. Provide Supportive Services for LMI & Special Needs

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 residents include activities such as services for persons with a disability, youth services, vulnerable population groups, job training, emergency assistance and health services.

**3. Evaluation of past performance**

The Town of Castle Rock is a new entitlement community designated by HUD in 2021. The Town deferred its entitlement status for CDBG funding in previous years and worked in partnership with Douglas County in past projects that benefit LMI and special needs groups such as downtown accessibility improvement projects. The Town has been successful in providing for services that benefit the senior population in Castle Rock; however, to expand upon existing services by the Town and local community organizations there is a need for increased funding and leverage of new resources. As a new recipient of HUD CDBG funding, the Town will be able to address additional needs of the elderly community and persons with a disability with ADA improvements. The Town will also be able to fill more service gaps in Castle Rock. These activities and accomplishments will be reported annually in the Consolidated Annual Performance and Evaluation Report (CAPER), which is due to HUD 90 days after every program year.

**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 Consolidated Planning process. The Town follows its HUD approved Citizen Participation Plan and has developed a formal process for gathering input from citizens and community stakeholders into the Consolidated Plan.

A series of public meetings about the basics of CDBG, an online community and stakeholder survey to gather input of the community needs and priorities, a public hearing, and a public comment review period allowed the public an opportunity to review and make comments on the plan.

Details of the citizen process are located in the PR-15 Citizen Participation section of this plan.

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

All comments were accepted. There were no organizations or agency types not intentionally consulted. The community and stakeholder surveys were uploaded as part of the public comments in the AD-25 Administration.

A summary of public comments is located in the PR-15 Citizen Participation section of this plan.

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

All comments were accepted. There were no comments rejected or not accepted.

## **7. Summary**

The priority needs of the Town were identified 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.

Primary data sources for the Consolidated Plan include: 2000 Census, 2015-2019 American Community Survey (ACS) 5-Year Estimates, 2013-2017 Comprehensive Housing Affordability Strategy (CHAS) data, Longitudinal Employer-Household Dynamics (LEHD), Homeless Management Information System (HMIS), Public and Indian Housing Information Center (PIC), HUD Income Limits, HUD Fair Market Rents and HOME Rent Limits and other local data sources. Data for map analysis came from the 2015-2019 ACS.

A disparity exists between data tables throughout the plan in that tables which utilize ACS contain 2015-2019 data, and tables that utilize CHAS contain 2017 data. At the time of writing only 2013-2017 CHAS data was available from HUD. In the plan, the Town utilized the most current data source where possible.

Below is a list of data sources and abbreviated form.

2015-2019 American Community Survey 5-Year Estimates (ACS)

2013-2017 Comprehensive Housing Affordability Strategy (CHAS)

2020 Housing Inventory Count (HIC)

2020 Point-in-Time Homeless Count (PIT)

Fair Market Rent (FMR)

Housing Urban Development Area Median Family Income (HAMFI)

Homeless Management Information System (HMIS)

Housing Choice Voucher (HCV)

Metro Denver Homeless Initiative (MDHI) Continuum of Care (CoC)

U.S. Department of Housing and Urban Development (HUD)

Longitudinal Employer-Household Dynamics (LEHD)

Public and Indian Housing Information Center (PIC)

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## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

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

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

Agency Role	Name	Department/Agency
Lead Agency	TOWN OF CASTLE ROCK	CDBG Program

**Table 1 – Responsible Agencies**

### Narrative

The Town of Castle Rock is a new entitlement community designated by HUD in 2021 and receives federal Community Development Block (CDBG) funds allocated through HUD's Community Planning Development program, which 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 of HUD regulations and guidelines.

### Consolidated Plan Public Contact Information

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## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

### **1. Introduction**

The 2021-2025 Consolidated Plan 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 and Douglas County. Stakeholder organizations were consulted through focus group meetings and an online stakeholder survey. The results helped to identify the community's priority needs over the next five years and the basis of the Strategic Plan, which outlines these needs and associated goals to address these needs.

#### **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(I)).**

The Town of Castle Rock worked closely with Douglas County staff to gather feedback for the Consolidated Plan. This included a shared list of community stakeholders which were specific to Castle Rock and included local nonprofits, other Town and government departments and other agencies. This helped to make sure participation efforts were not duplicated and the community needs were accurately recorded.

The Town also works with the County Community of Care Network (CCN), which is a collaborative group of organizations, agencies and individuals seeking to provide an opportunity for everyone in Douglas County to thrive. This coordinated effort aims to educate the community, advocate on behalf of clients and serve the area's most vulnerable residents.

#### **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.

In Douglas County, the County Community of Care Coordinator coordinates with MDHI to collect Point-in-Time surveys at the Community of Care Network's January "Strive to Thrive" event – an event where the county partners with local food pantries to provide food and increase awareness of resources available for individuals and families in the community. In Castle Rock, local partner organizations include The Rock Church and Saint Vincent de Paul of Castle Rock.

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

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**

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**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Town of Castle Rock
	<b>Agency/Group/Organization Type</b>	Housing Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development
	<b>How was the Agency/Group/Organization consulted and 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 Consolidated Plan.
2	<b>Agency/Group/Organization</b>	Douglas County
	<b>Agency/Group/Organization Type</b>	Housing Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs Economic Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Douglas County worked with the Town on the citizen participation process and stakeholder consultations.
3	<b>Agency/Group/Organization</b>	Colorado Lions Camp
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Year-round camp for children with disabilities
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization consulted on the housing and community development needs by taking the stakeholder survey.
4	<b>Agency/Group/Organization</b>	Integrated Life Choices
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs



	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization consulted on the housing and community development needs by taking the stakeholder survey.
5	<b>Agency/Group/Organization</b>	Williams World, LLC
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Autism Therapy, Home Healthcare, Day Program
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization consulted on the housing and community development needs by taking the stakeholder survey.
6	<b>Agency/Group/Organization</b>	Continuum of Colorado
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Services-Persons with Disabilities Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Home Health
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization consulted on the housing and community development needs by taking the stakeholder survey.
7	<b>Agency/Group/Organization</b>	EZ Connections, LLC
	<b>Agency/Group/Organization Type</b>	Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Community Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization consulted on the housing and community development needs by taking the stakeholder survey.
8	<b>Agency/Group/Organization</b>	St. Vincent de Paul Society Castle Rock
	<b>Agency/Group/Organization Type</b>	Services - Housing Services - Poverty
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs Anti-poverty Strategy

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization consulted on the housing and community development needs by taking the stakeholder survey.
9	<b>Agency/Group/Organization</b>	Castle Rock Senior Center
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Senior Community Center
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This organization consulted on the housing and community development needs by taking the stakeholder survey.
10	<b>Agency/Group/Organization</b>	BroadbandNow
	<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>	Housing Need Assessment Economic Development Community Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	BroadbandNow is a research organization which publishes data on the digital divide and impact of high-speed internet in society. It believes broadband internet should be available to all Americans and its mission is to help find and compare internet options with a goal to bring attention to underserved areas. The Town consulted with the BroadbandNow website for broadband access and identified high-speed internet providers in the Town.

**Identify any Agency Types not consulted and provide 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 Castle Rock share the goal to end homelessness in the region; the CoC helped to inform the homeless initiatives in the plan.

**Table 3 – Other local / regional / federal planning efforts****Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(l))**

The Town of Castle Rock worked closely with Douglas County in the coordination of consultation from local stakeholders for the Consolidated Plan. The Town benefits from the efforts of the Metro Denver Homeless Initiative and the Tri-County Health Department, and other regional partners that the Town has drawn strategies from for this plan. The Town also coordinates with local Town departments such as the Parks and Recreation, Public Works and Development Services departments to address community needs and implement local service efforts.

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

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

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, in particular low- and moderate-income persons, and the special needs community such as the elderly and those with any disability. The plan also consulted local stakeholders community organizations for input on the community development needs and funding priorities.

Citizen participation efforts for the development of the Consolidated Plan included several public meetings and a meeting with Town Council to present information on the CDBG program. A 30-day public comment period was held to allow members from the public an opportunity to review and make comments on the draft plan. A public hearing was held to also allow members of the public an opportunity to make comments on the plan. All comments were welcome.

See in the following table for details of the citizen participation outreach efforts.

## Citizen Participation Outreach

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Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
1	Public Meeting	Non-targeted/broad community	<p>A virtual public meeting was held on April 12, 2021 at 6:00 PM to present and discuss the CDBG program.</p> <p>The plan was also recorded and is available at link:  <a href="https://www.youtube.com/watch?v=D-WxnupBPHw">https://www.youtube.com/watch?v=D-WxnupBPHw</a></p>	<p>There were 10 members from the public including the Mayor in attendance. The mayor made comments in support of the plan.</p> <ul style="list-style-type: none"> <li>- There was one comment on how the maps were generated, and the Town consultant explained the data from the maps are from the 2015-2019 ACS and mapped by census tract. The purpose of the mapping is to show where there was need geographically.</li> <li>- There was a question about demographics. The plan will discuss and assess disproportionate need for minority groups.</li> <li>- There was a question about the number of renters versus homeowners. The data of households by occupancy is in the plan and will be shared with the caller.</li> <li>- There was a question about age and community needs for seniors. The plan will discuss senior housing, and the results from the community point to a need for programs for seniors and are likely a high priority.</li> </ul>	All comments were welcome.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
2	Public Meeting	Non-targeted/broad community	<p>A virtual public meeting was held on April 15, 2021 at 6:00 PM to present and discuss the CDBG program.</p> <p>The plan was also recorded and is available at link:  <a href="https://www.youtube.com/watch?v=hyulGzqS3fl">https://www.youtube.com/watch?v=hyulGzqS3fl</a></p>	<p>There were 9 in attendance, all were staff or Town Council members.</p> <ul style="list-style-type: none"> <li>- There was a question on funding for the Consolidated Plan. The plan is a 5-year plan period and funds are determined by the Town over the plan period. The Town does not have to apply for funds, the Town is entitled to the grant funds.</li> <li>- What is the most common use of funds for a Town similar such as Castle Rock? For this size allocation, it is normal to see public services (capped at 15%), and public infrastructure improvements.</li> </ul>	All comments were welcome.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
3	Community Survey	Non-targeted/broad community	A public community survey was held online for local stakeholder organizations to help determine the community development needs and priority funding.	<p>The community survey had 208 responses from the public with the top 3 priorities for the community:</p> <ol style="list-style-type: none"> <li>1. Affordable Housing (new affordable rental, independent senior housing, DPA)</li> <li>2. Public Services (special needs services)</li> <li>3. Public Facilities (community centers, parks)</li> </ol> <p>Community survey results were uploaded into the AD-25 citizen participation link.</p>	All comments were welcome.	



Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
4	Stakeholder Survey	Non-targeted/broad community Stakeholder Organizations	A stakeholder survey was held online for local stakeholder organizations to help determine the community development needs and priority funding.	<p>The stakeholder survey had 8 responses from neighborhood organizations and agencies with the top 3 priorities for the community:</p> <ol style="list-style-type: none"> <li>1. Public services (special needs, food assistance, transportation)</li> <li>2. Affordable housing (new affordable rental, independent senior housing)</li> <li>3. Public facilities improvements (ADA ramps)</li> </ol> <p>Stakeholder survey results were uploaded into the AD-25 citizen participation link.</p>	All comments were welcome.	
5	Public Meeting	Non-targeted/broad community Town Council	The draft Consolidated Plan was presented to Town Council on June 1, 2021 at 6PM. There was a review of data, priorities and goals in the plan.	All comments are accepted. To be updated after the June 1, 2021 meeting.	All comments were welcome.	
6	Public Comment Period	Non-targeted/broad community	A 30-day public comment period was held from June 18, 2021 to July 19, 2021 to allow the public an opportunity review and make comments on the draft plan. Comments could be returned to the contact information in the PR-05.	All comments are accepted. To be updated after the public comment period.	All comments were welcome.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL
7	Public Hearing	Non-targeted/broad community	A public hearing was held at Town Council to review and approve the plan on July 20, 2021 at 6:00 PM.	All comments are accepted. To be updated after the July 20, 2021 meeting.	All comments were welcome.	

**Table 4 – Citizen Participation Outreach**

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# Needs Assessment

## NA-05 Overview

### Needs Assessment Overview

This section assesses the housing needs within the Town of Castle Rock by analyzing various demographic and economic indicators. To understand the needs of the community, the broad trends in population, income, and household demographics must be analyzed first. Each of the following sections looks closely at specific housing factors and how they relate to the Town's population.

1. Housing Needs Assessment
2. Disproportionately Greater Need
3. Public Housing
4. Homeless Needs Assessment
5. Non-Homeless Special Needs Assessment
6. Non-Housing Community Development Needs

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The Footer changed starting on this page...need to add "TOWN OF" and fix the spacing of "Consolidated Plan" on the left side

## NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

### Summary of Housing Needs

The housing needs of a community are, like all items in the market economy, a product of supply and demand. However, determining the factors that impact supply and demand is much more complicated than building one house for one household. Changes in population, household size, availability of rental housing, income, and the condition of a property all work to shift the community's housing needs.

### Demographics

The population of the Town of Castle Rock has increased by 41% since 2010 and the number of households has grown by 36%. This demographic shift increased the average household size slightly from 2.8 to 2.9 people per household. During the same period the median income in the Town has increased by 28% to \$109,700. According to the Bureau of Labor Statistics, when inflation is considered, the actual increase in purchasing power for a household earning median income is 10.5%.

Demographics	Base Year: 2010	Most Recent Year: 2019	% Change
Population	44,402	62,417	41%
Households	15,675	21,336	36%
Median Income	85,461	109,700	28%

**Table 5 - Housing Needs Assessment Demographics**

Alternate Data Source Name:

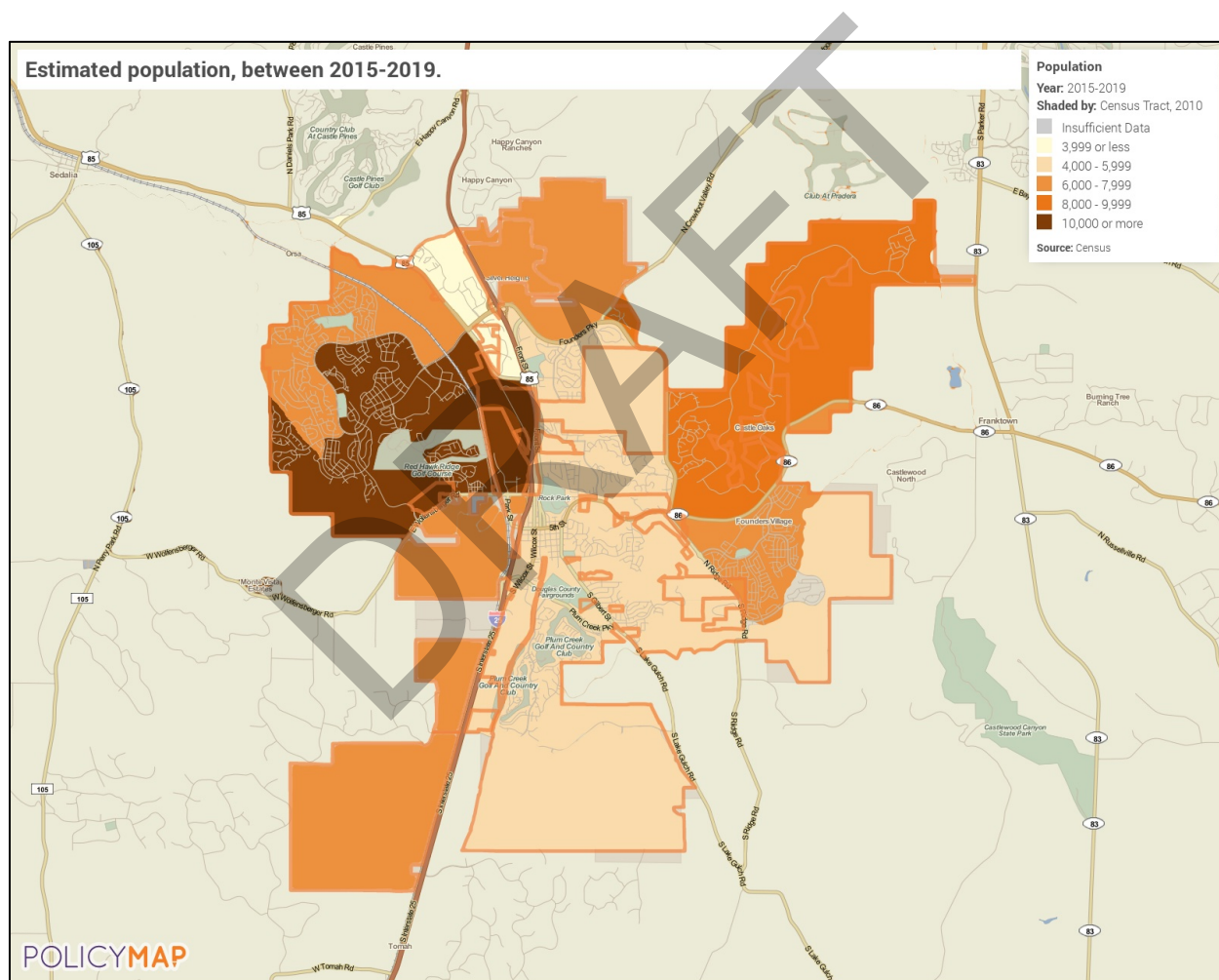
2006-2010 ACS, 2015-2019 ACS

The following maps display the geographic distribution of demographic trends in the Town across a few key indicators including population change, median household income, and poverty.

## Population

The following map displays the population density throughout the Town. Lighter colored tracts have less of a concentration of the population, while darker tracts have a higher population density. One area on the western portion of the Town has over 10,000, which is more people than any other tract in the Town. The tract with the lowest number of people borders the high population tract and reports fewer than 4,000 people.

Source: 2015-2019 American Community Survey 5-Year Estimates

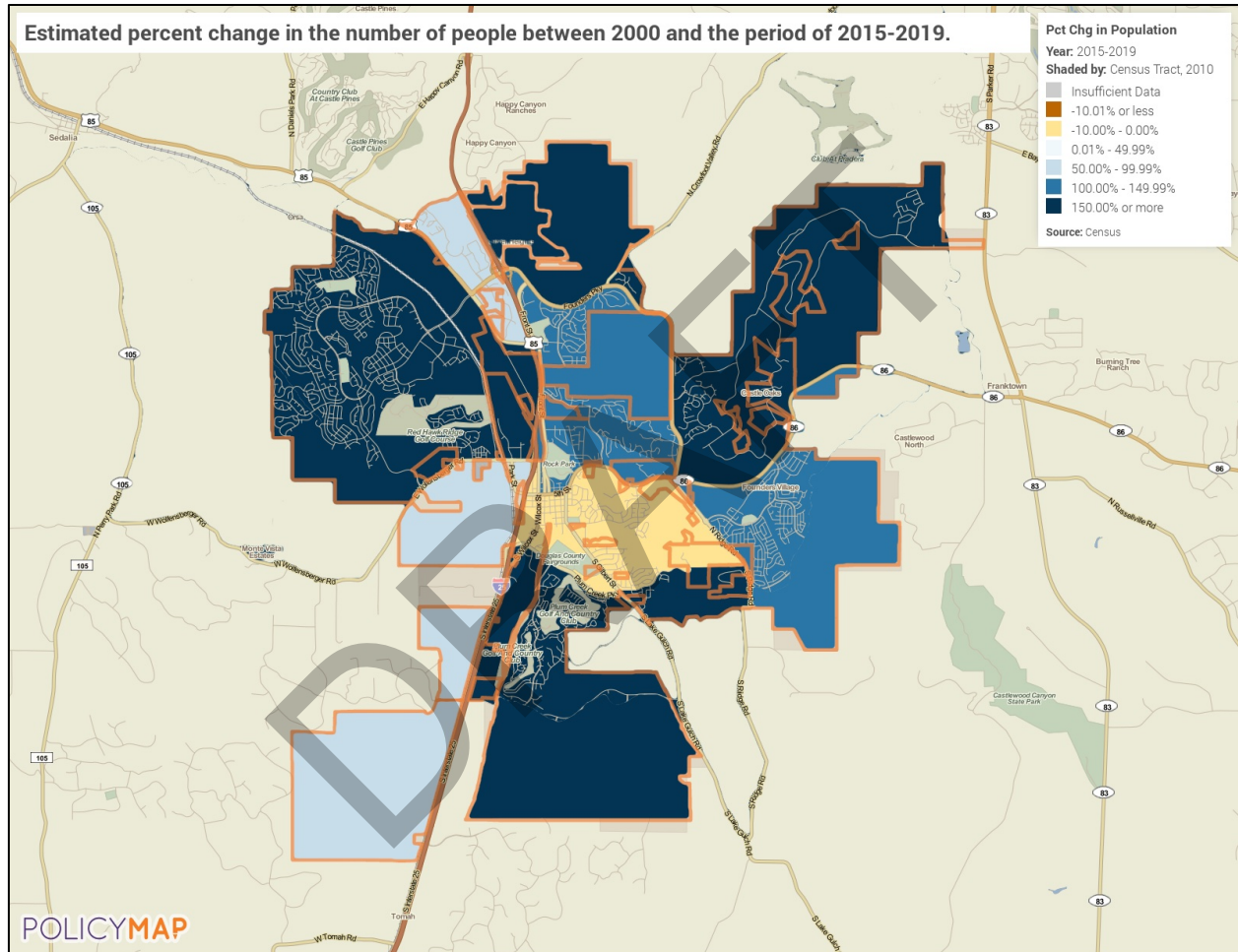


## Population

## Change in Population

The map below displays the population change throughout the jurisdiction since 2000. The change in population was not uniform throughout the Town. An area of downtown had a reduction of population while the rest of the Town grew. Growth was particularly high in the outer tracts where the population grew by over 150%.

Source: 2015-2019 American Community Survey 5-Year Estimates

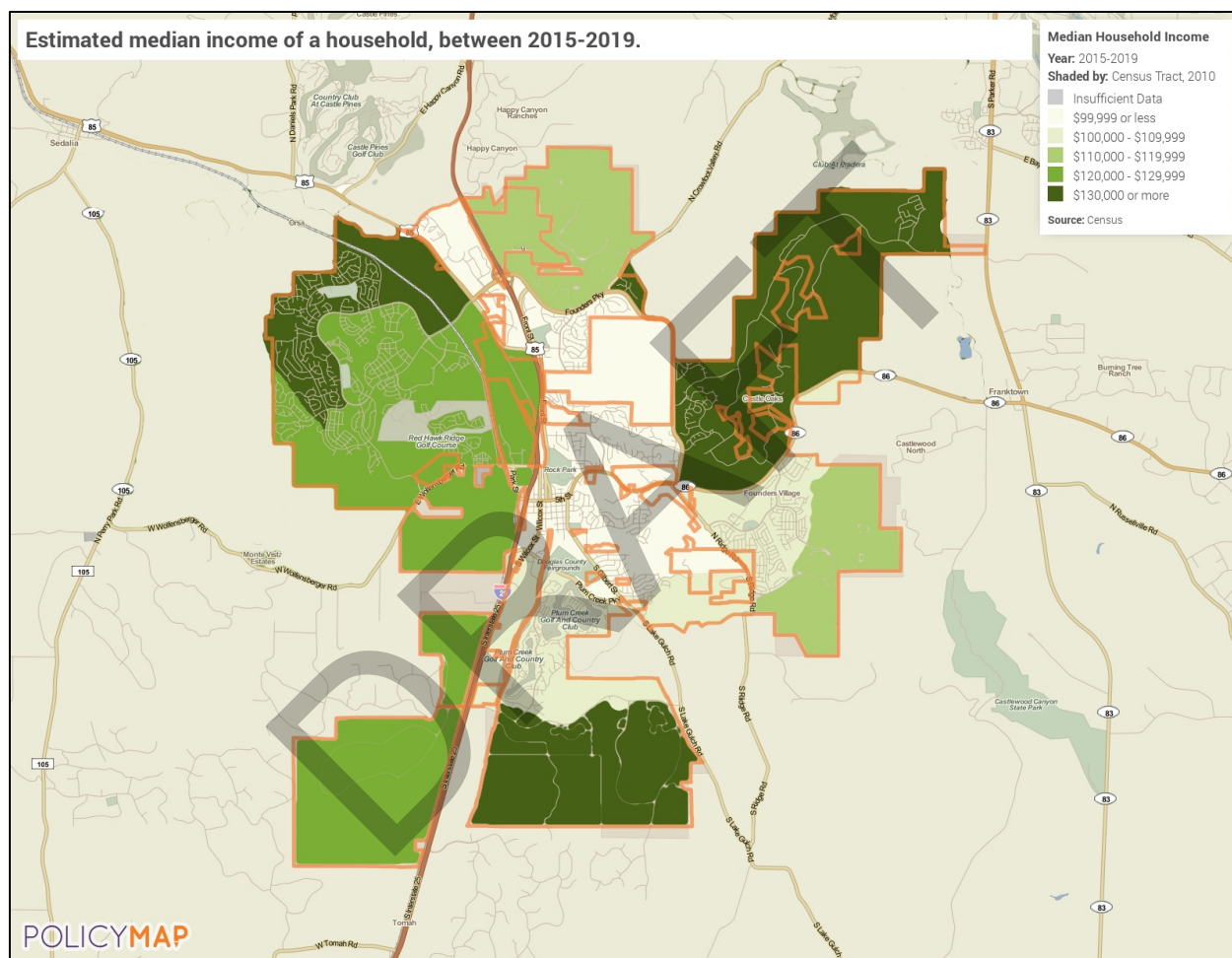


## Population Change

### Median Household Income

The map below displays the median household income by census tract throughout the jurisdiction. In 2019, the median household income was \$109,700, but the income varied considerably throughout the Town. The central part of the Town reported the lowest median income, less than \$100,000. Tracts in the northwest, northeast, and south had the highest median income, over \$130,000.

Source: 2015-2019 American Community Survey 5-Year Estimates



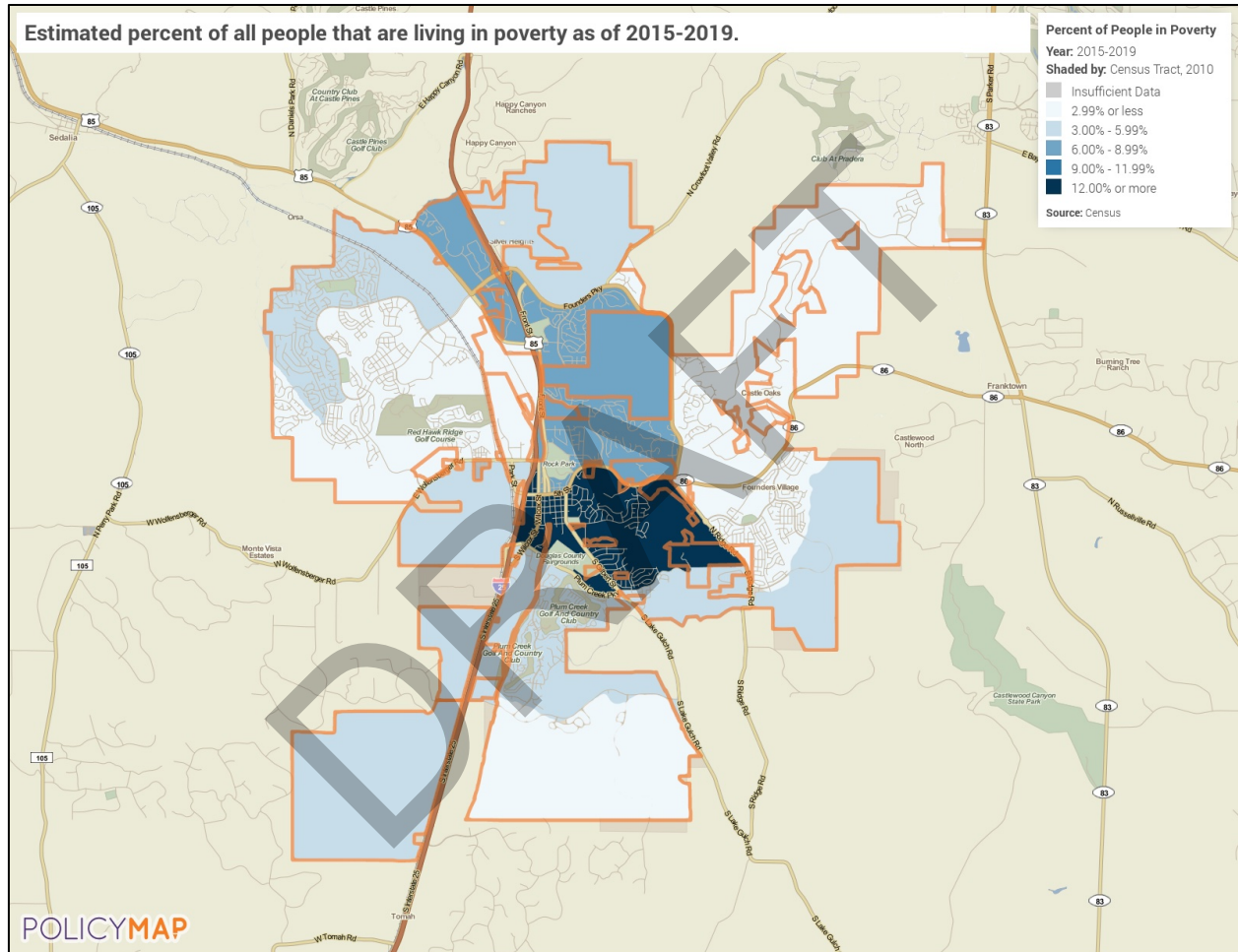
### Median Household Income



## Poverty

The map below displays the percentage of the population who live below the poverty level by census tract. Unsurprisingly, areas that have higher median income tend to have lower levels of poverty. The poverty rate in relatively low income tracts was over 12% and in most relatively high income tracts it was less than 3%.

Source: 2015-2019 American Community Survey 5-Year Estimates





## Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80- 100% HAMFI	>100% HAMFI
Total Households	1040	1165	2275	1900	13005
Small Family Households	275	475	805	860	7960
Large Family Households	140	60	260	195	2020
Household contains at least one person 62-74 years of age	250	280	540	335	1930
Household contains at least one person age 75 or older	180	190	315	185	470
Households with one or more children 6 years old or younger	240	279	540	300	3265

**Table 6 - Total Households Table**

Alternate Data Source Name:  
2013-2017 CHAS

## Number of Households

The above table breaks down family dynamics and income in the jurisdiction using 2017 CHAS data. In Castle Rock, there is some correlation between household income and household type. Households with greater than 100% Housing Urban Development Area Median Family Income (HAMFI) are more likely to be small households than in other income groups, and small households are less common in the extremely low income range (0-30% HAMFI) than in other income groups. Higher income households are also less likely to have a member older than 62 years present than other income groups.

Note: HAMFI is the median family income calculated by HUD for each jurisdiction, in order to determine Fair Market Rents (FMRs) and income limits for HUD programs.

## Housing Needs Summary Tables

### 1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	15	0	0	25	40	0	0	15	0	15
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	10	0	0	15	25	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	50	20	15	25	110	0	4	20	0	24
Housing cost burden greater than 50% of income (and none of the above problems)	420	210	160	20	810	335	285	250	75	945
Housing cost burden greater than 30% of income (and none of the above problems)	10	220	420	150	800	80	185	680	485	1430
Zero/negative Income (and none of the above problems)	10	0	0	0	10	65	0	0	0	65

**Table 7 – Housing Problems Table**

Alternate Data Source Name:  
2013-2017 CHAS

## Housing Needs Summary

The table above gives an overview of housing problems in the Town. Using 2017 CHAS data, it provides the numbers of households experiencing each category of housing problem broken down by income ranges (up to 100% AMI) and owner/renter status. Cost burden is clearly the biggest housing problem in the Town in terms of sheer numbers – a common trend in many communities across the state and nation today. According to the 2017 CHAS data there were 1,610 renters and 2,375 homeowners in the 0% to 100% AMI range spending more than 30% of their income on housing costs (100% AMI is the area median income).

### 2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	505	450	595	235	1785	415	475	965	560	2415
Having none of four housing problems	25	90	195	510	820	25	150	520	600	1295
Household has negative income, but none of the other housing problems	10	0	0	0	10	65	0	0	0	65

**Table 8 – Housing Problems 2**

Alternate Data Source Name:  
2013-2017 CHAS

### Severe Housing Problems

The above table shows households with at least one severe housing problem broken out by income and occupancy. Severe housing problems are more common in extremely low income households than other income groups. Over 93% of extremely low income renters and 82% of extremely low income owners have a severe housing problem.

### 3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	135	255	240	630	140	145	370	655
Large Related	70	30	70	170	70	26	90	186
Elderly	200	85	70	355	85	105	125	315
Other	100	70	200	370	100	115	165	380
Total need by income	505	440	580	1525	395	391	750	1536

**Table 9 – Cost Burden > 30%**

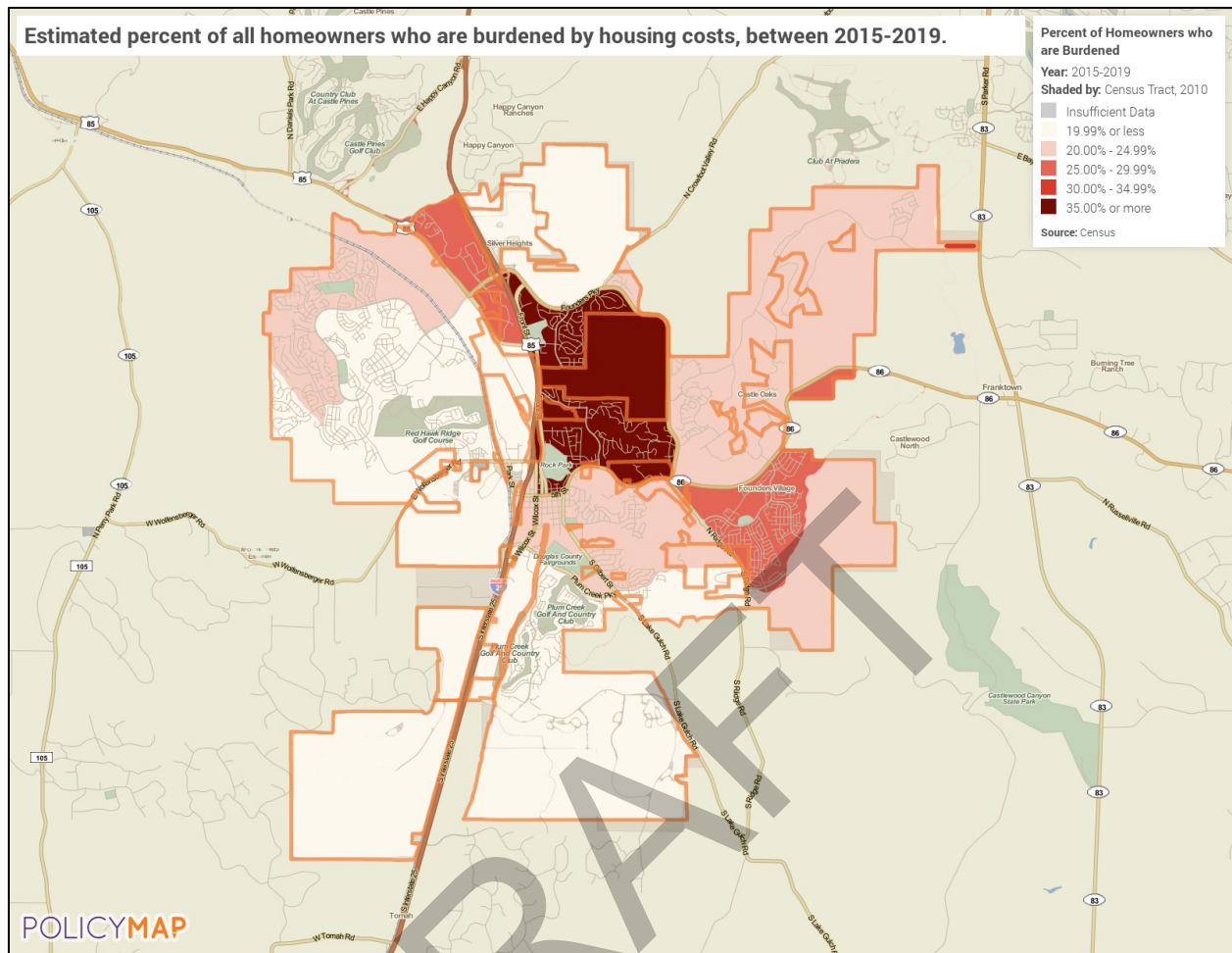
Alternate Data Source Name:  
2013-2017 CHAS

#### Cost Burden

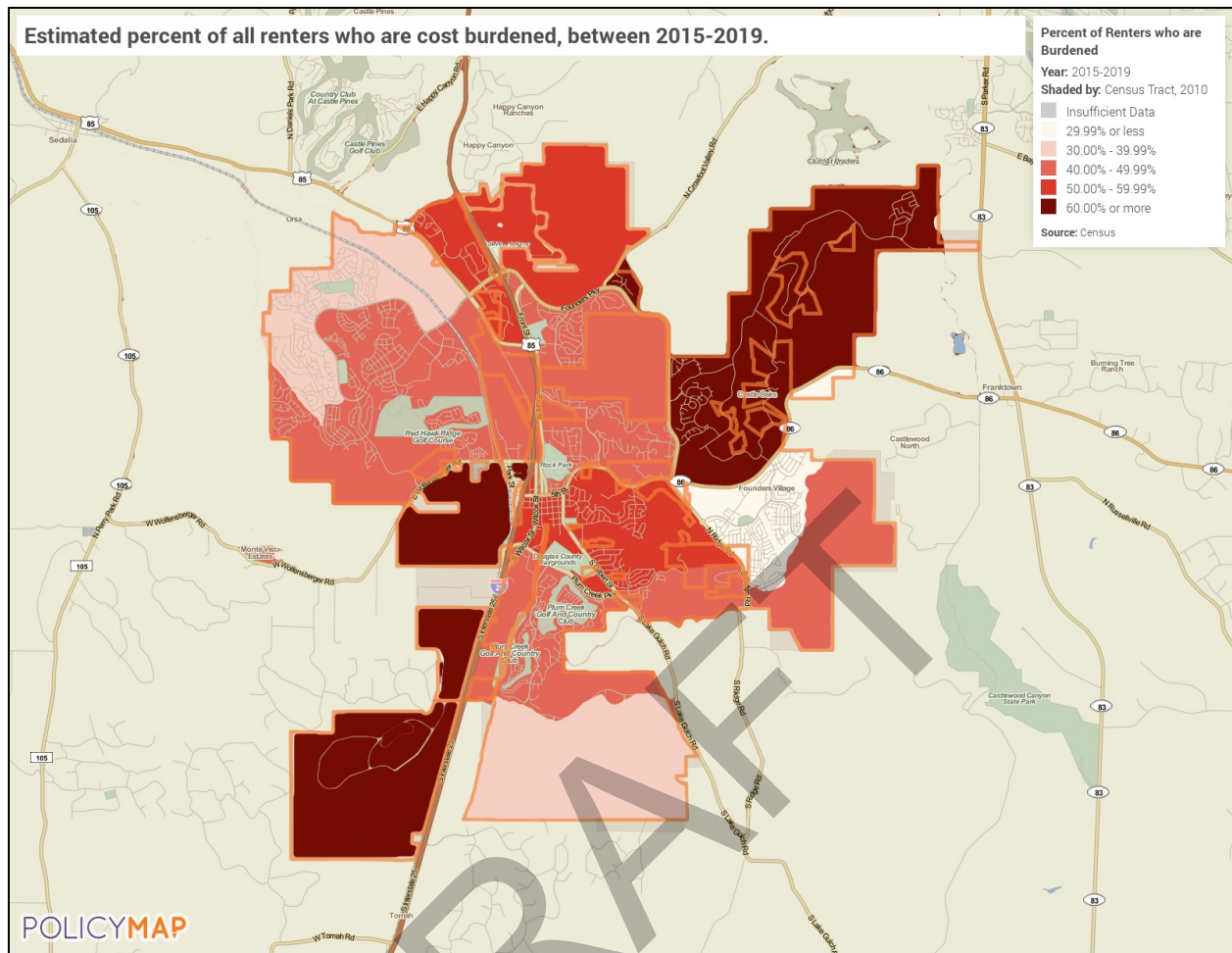
The table above displays 2017 CHAS data on cost-burdened households in the Town for the 0% to 80% AMI cohorts. HUD defines cost-burden as paying more than 30% monthly income on housing costs.

The following maps display the percentage of the population who are cost-burdened by census tract using data from the 2015-2019 American Community Survey 5-Year Estimates. Despite higher median household incomes in the Town, there are still high rates of cost burden. Throughout the Town there are places where over 35% of homeowners and over 60% of renters are cost burdened.

Source: 2015-2019 American Community Survey 5-Year Estimates



## Cost Burdened Homeowners



## Cost Burdened Renters

### 4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	135	105	45	285	90	145	105	340
Large Related	20	10	40	70	70	0	4	74
Elderly	195	50	15	260	45	55	55	155
Other	90	40	60	190	100	65	10	175
Total need by income	440	205	160	805	305	265	174	744

**Table 10 – Cost Burden > 50%**

Alternate Data Source Name:  
2013-2017 CHAS

## Severe Cost Burden

The data presented above show the severe cost burden in the Town, which is defined as paying more than 50% of household income on housing cost. Elderly renters in the extremely low income group is the largest household type with severe cost burdens.

## 5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	60	20	15	25	120	0	4	20	0	24
Multiple, unrelated family households	0	0	0	0	0	0	0	0	0	0
Other, non-family households	0	0	0	15	15	0	0	0	0	0
Total need by income	60	20	15	40	135	0	4	20	0	24

Table 11 – Crowding Information – 1/2

Alternate Data Source Name:  
2013-2017 CHAS

## Overcrowding

HUD defines an overcrowded household as one having from 1.01 to 1.50 occupants per room and a severely overcrowded household as one with more than 1.50 occupants per room. This type of condition can be seen in both renter and homeowner households. Overcrowding was more prevalent in renter-occupied housing units than in owner-occupied units.

The table below displays the number of households with children present. Children in overcrowded homes are more likely to reside in rental housing in the Town.

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	165	190	165	520	75	89	375	539

Table 12 – Crowding Information – 2/2

Alternate Data Source Name:  
2013-2017 CHAS

**Describe the number and type of single person households in need of housing assistance.**

The Five-Year Estimates of the 2019 American Community Survey show that 17.2% of occupied housing units in Castle Rock (approximately 3,667 households) are single-person households. Approximately 31.9% of renter-occupied units are single-person households as compared to 13% of owner-occupied households. Renters are the most in need of housing assistance due to the high number who are cost burdened. Over 1,400 residents over the age of 65 live alone. As noted above, elderly residents are particularly likely to be cost burdened and/or in extremely low income households.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

*Disability*

According to 2015-2019 ACS data, there are 4,731 residents with disabilities in Castle Rock making up 7.7% of the population. Approximately 525 of these residents are under the age of 18. Overall, the most common disability is cognitive difficulty, and 1,916 residents report this difficulty. For residents 65 years old and older, the most common difficulty reported is ambulatory difficulty.

Residents with disabilities and families with children with disabilities face significant barriers to affordable housing. Most homes require expensive modifications to accommodate the needs of residents. Additionally, residents with disabilities earn less than those without disabilities, which increases the financial hardship.

*Violence*

According to the Castle Rock Police Department Annual Report, in 2019 there were 264 person crimes in the Town, an increase from 244 in 2018. Approximately 11% of the person crimes were sex crimes, a decrease from 13% in 2018. Castle Rock Police Department's Detective Unit has eight members, one of which is assigned to special victims crimes/sexual assault crimes.

It is likely that the sex crime rate is actually higher than what is reported. Domestic violence and sexual assault are often underreported due to fear for the safety of oneself or children, a lack of housing options and economic opportunities, and distrust in the system. According to a study by the US Department of Justice, the most dangerous time for a person in an abusive relationship is when they attempt to leave. Exiting an abusive relationship is often incredibly difficult and it is important that resources are available to provide safe housing for victims and that people are aware of these resources.

**What are the most common housing problems?**

The most common housing problem in Castle Rock is cost burden. A significant number of both homeowners and renters spend more than 30% of their income on housing expenses alone. This puts them at risk of housing insecurity, particularly for low-income households. The cost of housing is a key factor, but it is only half of the equation. The lack of adequate economic opportunities is also a major



factor, particularly for elderly residents who may be on a fixed income and require support to keep up with rising housing costs.

**Are any populations/household types more affected than others by these problems?**

Household income is significantly linked to the likelihood that someone is impacted by housing problems. Low income households and households with an elderly person present have a higher rate of housing problems than other groups, while small households are more likely to have higher incomes and fewer housing problems.

The relationship between housing problems and race and ethnicity is addressed in the Market Analysis portion of this document.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance**

Very low-income households (those at or below 30% of the area median income) spending more than 50% of their income for gross rent (rent plus tenant paid utilities) are particularly vulnerable to an unexpected financial or personal crisis which could lead to homelessness. Among these households, single-parent households with children are the most vulnerable. They have a greater need for affordable housing, accessible day care, health care, and other supportive services. Because of their lower income and higher living expenses, single-parent households are at imminent risk of becoming homeless. The major needs for these households are money management and budget counseling along with job training and affordable childcare.

The benefit to participants of a rapid re-housing program is the on-going case management and wrap around services that they receive over the duration of the program. The major need for those households exiting the program is to locate and secure decent affordable housing.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

The jurisdiction does not provide an estimate of at-risk populations.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness**

Persons identified to be at increased risk include: persons who are extremely low-income; persons with disabilities; persons fleeing domestic violence; homeless persons being discharged from crisis units, hospitals and jails; unaccompanied youth; and youth aging out of foster care. Prevention assistance is also primarily provided to persons who have already received notice that eviction proceedings have been started in court (rather than just a three-day notice from landlord), since they are the households most likely to be evicted without assistance.

DRAFT

## NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction

This section compares the existence of housing problems amongst racial groups against that of the jurisdiction to see if any group(s) share a disproportionate burden of the area's housing problems. For this purpose, HUD guidelines deem a disproportionately greater need to exist when persons of a racial or ethnic group experience housing problems at a rate at least 10 percentage points higher than the jurisdiction as a whole.

The following series of tables looks at the existence of housing problems amongst different racial and ethnic groups across the 0%-30%, 30%-50%, 50%-80%, and 80%-100% AMI cohorts.

### 0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	920	50	75
White	770	50	65
Black / African American	20	0	0
Asian	4	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	120	0	10

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Alternate Data Source Name:  
2013-2017 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	925	240	0
White	785	205	0
Black / African American	20	0	0
Asian	10	0	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	80	30	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Alternate Data Source Name:  
2013-2017 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### 50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1560	715	0
White	1375	685	0
Black / African American	0	0	0
Asian	4	25	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	165	0	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Alternate Data Source Name:  
2013-2017 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

## 80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	795	1110	0
White	705	1010	0
Black / African American	0	0	0
Asian	0	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	65	65	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Alternate Data Source Name:  
2013-2017 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

### Discussion

#### *Extremely Low Income (0-30% AMI)*

Townwide, 88% of households in this group have a housing problem. In this income group there are two groups disproportionately impacted including 100% of Black or African American households and Asian households reporting a housing problem. However, these groups are relatively small, only 20 households and 4 households, respectively.

#### *Very Low Income (30%-50% AMI)*

Approximately 79.4% of households in this group have a housing problem. There are two groups disproportionately impacted including 100% of Black or African American households and Asian households reporting a housing problem. However, these groups are relatively small, only 20 households and 10 households, respectively.

#### *Low Income (50%-80% AMI)*

The Townwide housing problem rate for this income group is 68.6%. In this income group there is one group disproportionately impacted including 100% of Hispanic households reporting a housing problem.

#### *Moderate Income (80%-100% AMI)*

Approximately 41.7% of households in this group have a housing problem. In this income group there are no groups that are disproportionately impacted by housing problems.

## NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205

### (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

#### Introduction

This section compares the existence of severe housing problems amongst racial groups against that of the jurisdiction to see if any group(s) share a disproportionate burden of the area's severe housing problems. For this purpose, HUD guidelines deem a disproportionately greater need to exist when persons of a racial or ethnic group experience severe housing problems at a rate at least 10 percentage points higher than the jurisdiction as a whole.

The following series of tables looks at the existence of severe housing problems amongst different racial and ethnic groups across the 0%-30%, 30%-50%, 50%-80%, and 80%-100% AMI cohorts.

#### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	830	135	75
White	715	105	65
Black / African American	20	0	0
Asian	4	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	90	30	10

Table 17 – Severe Housing Problems 0 - 30% AMI

Alternate Data Source Name:  
2013-2017 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	520	650	0
White	435	550	0
Black / African American	10	10	0
Asian	10	0	0
American Indian, Alaska Native	0	10	0
Pacific Islander	0	0	0
Hispanic	45	65	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Alternate Data Source Name:  
2013-2017 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

### 50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	460	1815	0
White	420	1635	0
Black / African American	0	0	0
Asian	0	30	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	45	125	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Alternate Data Source Name:  
2013-2017 CHAS

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

## 80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	160	1745	0
White	135	1585	0
Black / African American	0	0	0
Asian	0	20	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	0	130	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Alternate Data Source Name:  
2013-2017 CHAS

\*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

## Discussion

### *Extremely Low Income (0-30% AMI)*

Townwide, 79.8% of households in this group have a severe housing problem. In this income group there are two groups disproportionately impacted including 100% of Black or African American households and Asian households reporting a severe housing problem. However, these groups are relatively small, only 20 households and 4 households, respectively.

### *Very Low Income (30%-50% AMI)*

Approximately 44.4% of households in this group have a severe housing problem. There is one group disproportionately impacted including 100% of Asian households reported a severe housing problem. However, this group is relatively small, only 10 households.

### *Low Income (50%-80% AMI)*

The Townwide severe housing problem rate for this income group is 20.2%. In this income group there are no groups disproportionately impacted.

### *Moderate Income (80%-100% AMI)*

Approximately 8.4% of households in this group have a severe housing problem. In this income group there are no groups that are disproportionately impacted by severe housing problems.



## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

### Introduction:

This section compares the existence of housing cost burden and severe cost burden amongst racial and ethnic groups against that of the jurisdiction to see if any group(s) share a disproportionate burden of the area's cost burden. For this purpose, HUD guidelines deem a disproportionately greater need exists when persons of a racial or ethnic group experience housing problems at a rate at least 10 percentage points higher than the jurisdiction as a whole.

A household is cost burdened if they spend between 30% and 50% of monthly income on housing costs, and severely cost burdened if they spend more than 50% of monthly income on housing costs.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	14414	3065	1840	75
White	12780	2555	1645	65
Black / African American	100	75	30	0
Asian	255	45	15	0
American Indian, Alaska Native	14	0	0	0
Pacific Islander	15	0	0	0
Hispanic	985	350	130	10

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Alternate Data Source Name:  
2013-2017 CHAS

### Discussion:

#### *Cost Burden*

In Castle Rock, 15.8% of the households pay between 30% and 50% of their income to housing expenses. There is one group disproportionately impacted. Approximately 36.6% of Black or African American households are cost burdened.

#### *Severe Cost Burden*

In the Town, approximately 9.5% of the households pay more than 50% of their income to housing expenses. There are no groups disproportionately impacted by severe cost burden.

## **NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**

**Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

Two racial groups, Black or African American and Asian, are disproportionately impacted by housing problems in multiple income groups.

Disproportionate Housing Problems:

- Extremely Low Income: Black or African American, Asian
- Very Low Income: Black or African American, Asian
- Low Income: Hispanic
- Moderate Income: None

Disproportionate Severe Housing Problems:

- Extremely Low Income: Black or African American, Asian
- Very Low Income: Asian
- Low Income: None
- Moderate Income: None

Cost Burden: Black or African American

Extreme Cost Burden: None

**If they have needs not identified above, what are those needs?**

No other needs identified at this time.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

Geographic concentrations of households by race, ethnicity, and income are discussed in MA-50.

## NA-35 Public Housing – 91.205(b)

### Introduction

Publicly supported housing was established to provide decent and safe rental housing for eligible low-income families, the elderly and persons with disabilities. The Town of Castle Rock falls within the Douglas County Housing Partnership (DCHP) service area, which serves Douglas County. DCHP is a multi-jurisdictional housing authority that was formed in 2003 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. According to the Public and Indian Housing (PIH) Information Center, there are 376 vouchers in use. While the total number of Housing Choice Vouchers (HCV) is 376, not all of these are used in Castle Rock.

### Totals in Use

	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of unit vouchers in use	0	0	0	376	0	370	0	0	0

**Table 22 - Public Housing by Program Type**

**\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition**

**Alternate Data Source Name:**

Public and Indian Housing Information Center (PIC )

## Characteristics of Residents

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	0	11,863	0	11,575	0	0
Average length of stay	0	0	0	5	0	5	0	0
Average Household size	0	0	0	2	0	2	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	0	58	0	58	0	0
# of Disabled Families	0	0	0	86	0	85	0	0
# of Families requesting accessibility features	0	0	0	2,516	0	1,964	34	186
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

**Alternate Data Source Name:**

Public and Indian Housing Information Center (PIC)

## Race of Residents

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	273	0	269	0	0	0
Black/African American	0	0	0	93	0	92	0	0	0
Asian	0	0	0	4	0	4	0	0	0
Am. Indian/Alaska Native	0	0	0	5	0	4	0	0	0
Pacific Islander	0	0	0	1	0	1	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Alternate Data Source Name:

Public and Indian Housing Information Center (PIC)

## Ethnicity of Residents

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	17	117	0	115	0	0	0
Not Hispanic	0	0	93	259	0	255	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Ethnicity of Public Housing Residents by Program Type

Alternate Data Source Name:

Public and Indian Housing Information Center (PIC)

**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

Waitlists are no longer maintained by affordable housing providers.

**Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

The most immediate need of residents living in Low Income Housing Tax Credit (LIHTC) properties and Housing Choice Voucher (HCV) holders is additional affordable housing and economic opportunities that can support self-sustainability. According to HUD PIH Information Center data, the average annual income of residents in publicly assisted housing is approximately \$12,519 for public housing residents and \$11,863 for voucher participants – both well below the median income in the Town. The Town does not have public housing units.

**How do these needs compare to the housing needs of the population at large?**

The lack of affordable rental units that accommodate workforce families, seniors and people with special needs or disabilities reflects the needs of the Town at large. A range of affordable housing types in a variety of locations is a strong need for many LMI households. The non-housing needs of LIHTC and HCV holders are employment opportunities and transportation, which also reflect those of the population at large, especially low-to-moderate income residents. The elderly may require housing accommodations due to the nature of elderly persons being more likely to be disabled and on fixed incomes than the general population. Also, persons with a disability likely need accommodation to make housing accessible.

## **NA-40 Homeless Needs Assessment – 91.205(c)**

### **Introduction:**

Homelessness is a particularly troublesome and complex issue that plagues communities across the nation. A major reason that homelessness is so difficult to combat is that it has many causes with overlapping and interrelated variables. The cause of any one person's homelessness often lies not in a single factor, but at the convergence of multiple events and conditions. From one angle, homelessness can be seen as an economic problem – caused by unemployment, foreclosure, or poverty. From another viewpoint, homelessness could appear to be a health issue – many homeless persons struggle with one or more conditions such as mental illness, physical disability, HIV/AIDS, or substance abuse. Looking at the problem another way, homelessness emerges as a social problem – with factors such as domestic violence, educational attainment, or race lying at the root. In reality, homelessness is caused by all of these issues, sometimes simultaneously. As such, fighting homelessness requires a truly collaborative, community-based approach.

The Stewart B. McKinney Homeless Assistance Act defines the "homeless" or "homeless individual" or "homeless person" as an individual who lacks a fixed, regular, and adequate night-time residence; and who has a primary night-time residence that is:

- A supervised publicly or privately operated shelter designed to provide temporary living accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill);
- An institution that provides a temporary residence for individuals intended to be institutionalized; or
- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

## Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	26	0	NA	NA	NA	NA
Persons in Households with Only Children	1	0	NA	NA	NA	NA
Persons in Households with Only Adults	13	13	NA	NA	NA	NA
Chronically Homeless Individuals	0	0	NA	NA	NA	NA
Chronically Homeless Families	0	0	NA	NA	NA	NA
Veterans	0	0	NA	NA	NA	NA
Unaccompanied Child	1	0	NA	NA	NA	NA
Persons with HIV	0	0	NA	NA	NA	NA

**Table 25 - Homeless Needs Assessment**

**Data Source:** 2020 PIT Count

2020 PIT Count. This Data is based on point-in-time survey data provided by the Metro Denver Homeless Initiative (MDHI). Data is provided for Douglas County. Point-in Time Date: 1/27/2020. There was a total of 53 homeless persons in all of Douglas County at that time.

**Data Source Comments:**

**Indicate if the homeless population is:** Has No Rural Homeless

**If data is not available for the categories "number of persons becoming homeless and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

Due to complications in gathering accurate data, the number of persons becoming homeless and exiting homelessness and number of days persons experience homelessness is not available. The available information for each of the categories of persons experiencing homelessness is discussed in the following questions.



### Nature and Extent of Homelessness: (Optional)

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	37	0
Black or African American	13	0
Asian	0	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	3	0
Not Hispanic	50	0

**Data Source:** 2020 PIT Count

2020 PIT Count. This Data is based on point-in-time survey data provided by the Metro Denver Homeless Initiative (MDHI). Data is provided for Douglas County. Point-in Time Date: 1/27/2020. There was a total of 53 homeless persons in all of Douglas County at that time. The table above does not show the estimated 3 persons who were other/multi-racial. MDHI PIT Count survey data is located at: [https://www.mdhi.org/2020\\_pit\\_reports](https://www.mdhi.org/2020_pit_reports)

**Data Source Comments:**

### Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.

*Families with Children:* According to the most recent data available, there is one person, an unaccompanied child, in a household with children and they are sheltered.

*Veterans:* According to the MDHI 2020 PIT Count, there are no veterans experiencing homelessness in Castle Rock.

### Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.

In Castle Rock, an estimated 69% of persons experiencing homelessness are White. Thirteen are Black or African American and three are multi-racial or classified as "Other".

### Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The majority of residents experiencing homelessness are sheltered. Only 13 are reported unsheltered. The race and ethnicity of residents based on whether they are sheltered or unsheltered is not available.

## **NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)**

### **Introduction:**

Non-homeless persons with special needs include the elderly; frail elderly; persons with mental, physical, and/or developmental disabilities; persons with drug and alcohol addictions; persons with HIV/AIDS and their families; and victims of domestic violence, sexual assault, and stalking. Members of these special needs populations often have low incomes. Data on special needs populations is limited, but there is a significant need for housing and/or supportive services for all special needs sub-populations and meeting these needs is a high priority for the Town.

### **Describe the characteristics of special needs populations in your community:**

Elderly: The elderly population faces increased challenges, and providing decent, affordable housing is incredibly important. It is medically beneficial and emotionally comforting for this population to remain in a familiar setting and, as a result, strong emphasis is placed on the elderly maintaining a lifestyle that is as independent as possible. Unfortunately, the elderly population is often on a limited income and/or has a disability, which puts financial pressure on them that reduces independence. As prices throughout the community inflate, the elderly population generally lacks the ability to increase their income to match.

HIV/AIDS: See below

Alcohol and Drug Addiction: Gathering accurate data about alcohol and drug addiction within a community is difficult. Addiction often goes unrecognized because people do not seek help due to fear of criminal charges and/or the social stigma associated with addiction and other medical issues. Often, only when someone overdoses, gets arrested, or seeks treatment are they counted in statistics.

Disability: As noted above, according to 2015-2019 ACS data, there are 4,731 residents with disabilities in Castle Rock making up 7.7% of the population. Approximately 525 of these residents are under the age of 18. Overall, the most common disability is cognitive difficulty, and 1,916 residents report this difficulty. For residents 65 years old and older, the most common difficulty reported is ambulatory difficulty.

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

Elderly and Frail Elderly: Providing secure, safe, affordable, and stable housing for the elderly population is vitally important for this population. There are many factors that contribute to a healthy environment for the elderly including, but not limited to, access to health care, shopping, and social networks. A robust public transportation network is incredibly beneficial to assisting the elderly remain active and independent. Additionally, elderly residents' homes may need modifications to assist with any disabilities that may develop because of aging.

Disability: Individuals with disabilities encompass a wide range of skill levels and abilities. Therefore, they have many of the same issues as the general population with the added needs that are unique to their

capabilities. Individuals with disabilities usually have a fixed income and have limited housing options. The individuals who have more independent skills tend to utilize subsidized housing options. Individuals requiring more support find residences in the public welfare funded community homes, either sharing settings or in privately-owned personal care settings. Many individuals continue to reside with parents and families throughout adulthood. Regardless of the housing situation, a common thread is the need for continuous support services dependent of the level of capabilities.

Persons with Alcohol/Drug Addictions: Individuals with substance abuse problems need a strong network to stay healthy and sober. Their housing needs include sober living environments, support for employment, access to health facilities, and easy access to family and friend networks. Additionally, detoxification facilities are necessary when addiction is first recognized.

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

According to the 2018 HIV/AIDS Epidemiology Profile, Douglas County reported 11 new HIV diagnoses in 2018, the highest number since 2014. There are currently 335 HIV diagnoses in the County. Men are overwhelmingly more likely to have HIV than females. Men make up 85.2% of people living with HIV in Douglas County. Information was not available at the Town level.

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction's need for Public Facility Improvements:**

The Town has identified public facility improvements – especially the need for ADA improvements as a priority need for LMI areas in Castle Rock. As such, the Town has established the public facility improvement goal below:

#### **1A. Improve Access to Public Facilities (ADA)**

The Town will work to provide improved access to public facilities, in particular for ADA improvements to neighborhood facilities, parks and recreation facilities, and ADA improvements to parking facilities etc. Public facility improvements are intended to have an LMI area wide benefit.

### **How were these needs determined?**

The need for public facilities was determined by the Town of Castle Rock by communicating and collaborating with other government units, as well as local non-profit and for-profit agencies. Public hearings were also held to receive guidance and feedback from the public.

### **Describe the jurisdiction's need for Public Improvements:**

The Town has identified public infrastructure improvements as a priority need for LMI areas in Castle Rock. As such, the Town has established the public infrastructure improvement goal below:

#### **1B. Improve Capacity of Public Infrastructure for LMI**

The Town will work to provide support for public infrastructure improvements such as street improvements, sidewalks, water and sewer improvements and ADA and other infrastructure improvements. Public infrastructure improvements are intended to have an LMI area wide benefit.

### **How were these needs determined?**

The need for public improvements was determined by the Town of Castle Rock communicating and collaborating with other government units, as well as local non-profit and for-profit agencies. Public hearings were also held to receive guidance and feedback from the public.

### **Describe the jurisdiction's need for Public Services:**

The Town has identified vital public services for LMI and special needs groups as a priority need for LMI areas in Castle Rock. Assisting the elderly population with necessary services to promote independent living is also a need. As such, the Town has established two public service goals below:

#### **2A. Provide Supportive Services for Seniors**

#### **2B. Provide Supportive Services for LMI & Special Needs**

The Town will work to provide for supportive services that improve the quality of life for the elderly living in Castle Rock. Supportive services for the elderly include activities such as independent living services, meal services, health and self-sufficiency assistance. The Town will also 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 residents include activities such as services for persons with a disability, youth services, vulnerable population groups, job training, emergency assistance and health services.

### **How were these needs determined?**

The need for public services was determined by the Town of Castle Rock by communicating and collaborating with other government units, as well as local non-profit and for-profit agencies. Public hearings were also held to receive guidance and feedback from the public.

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## **Housing Market Analysis**

### **MA-05 Overview**

#### **Housing Market Analysis Overview:**

This section looks at the housing market and supply in the Town of Castle Rock by analyzing housing indicators. Developing a picture of the current housing stock in the community begins by looking at trends in structure, age, price and tenure. Furthermore, the supply of homeless shelter facilities, special needs services and housing, and non-housing community development resources are considered. The analysis is supplemented by GIS maps to provide geographical visualization of the data.

DRAFT

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

This section examines the composition of Castle Rock's housing stock in terms of housing type and tenure. Details are provided based on the number of units in the structure, multi-family housing distribution within the jurisdiction, unit size and tenure, as well as an analysis of owner-occupied and renter occupied housing.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	16,355	74%
1-unit, attached structure	1,835	8%
2-4 units	335	2%
5-19 units	1,824	8%
20 or more units	1,520	7%
Mobile Home, boat, RV, van, etc	122	1%
<i>Total</i>	21,991	100%

**Table 26 – Residential Properties by Unit Number**

Alternate Data Source Name:  
2015-2019 ACS

### Residential Properties by Number of Units

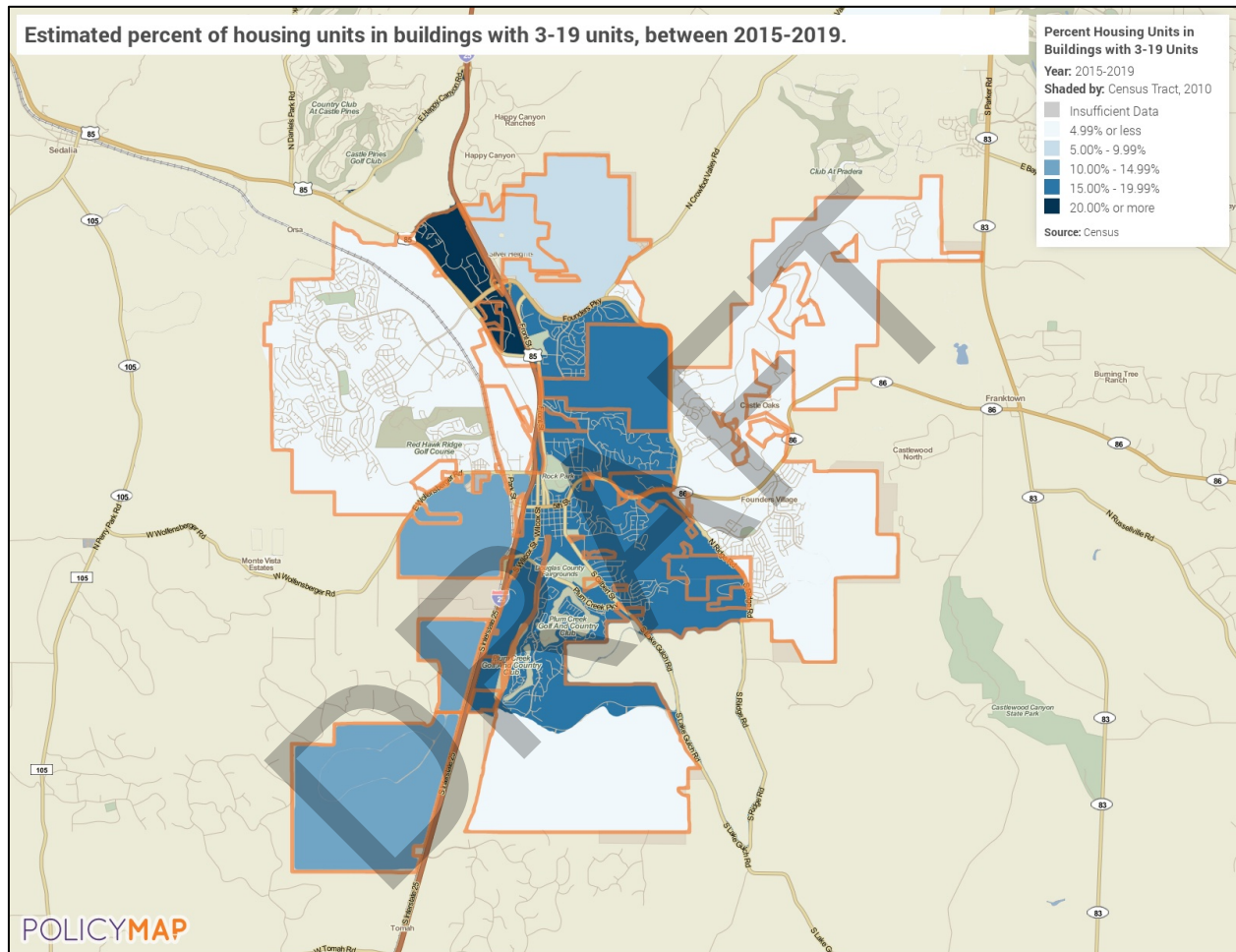
The table above breaks down the Town's housing stock by the number of units in each structure and by structure type. Traditional single-family, detached homes are most prominent, accounting for 74% of all housing units. Multi-family developments (5 or more units) account for 15% of all housing units in the Town.

Source: 2015-2019 American Community Survey 5-Year Estimates

## Multi-family Development Distribution

The maps below display the distribution of small, medium and large multi-family developments in the jurisdiction. Small multi-family units are buildings with 3-19 units and are most common in the central and northern part of the City.

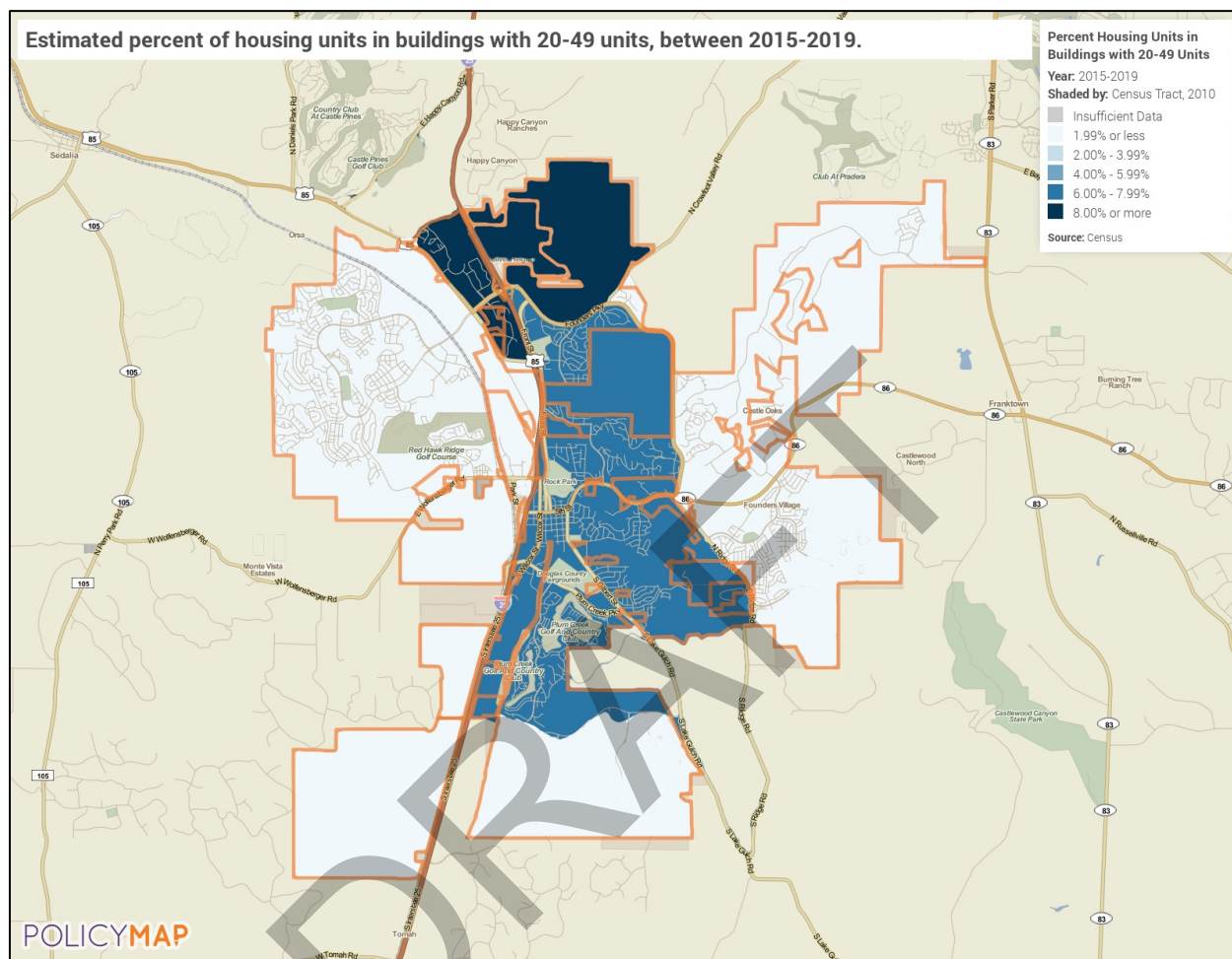
Source: 2015-2019 American Community Survey 5-Year Estimates



### Small Multi-family Developments

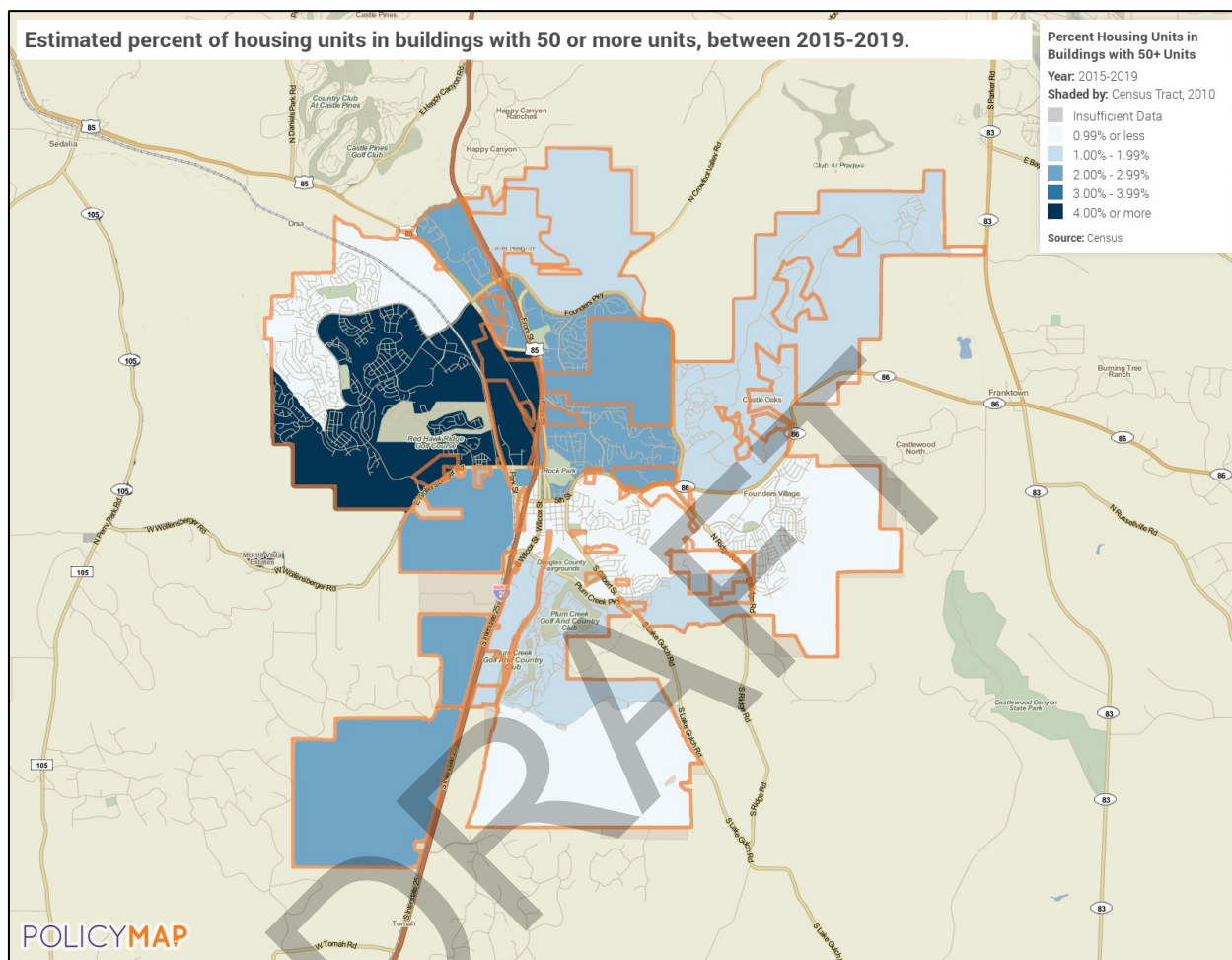


Medium multi-family developments are buildings with 20-49 units and are less common than small multi-family developments. Medium developments are most prominent in the northern part of the Town where they make up over 8% of the housing stock.



## Medium Multi-family Developments

Large multi-family units are buildings with 50 or more units and they are less common than small or medium developments. There is only one area, on the western part of the Town, where more than 4% of the units are in a large development.



**Large Multi-family Developments**

## Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	0	0%	128	3%
1 bedroom	45	0%	1,121	24%
2 bedrooms	1,406	9%	1,867	39%
3 or more bedrooms	15,125	91%	1,644	34%
<i>Total</i>	16,576	<b>100%</b>	4,760	<b>100%</b>

Table 27 – Unit Size by Tenure

Alternate Data Source Name:  
2015-2019 ACS

## Unit Size by Tenure

In Castle Rock there is a correlation between tenure and unit size. Small units are very uncommon for homeowners with approximately 9% of the units having fewer than three bedrooms. Rental units are much more likely to be small. Approximately 66% of rental units have fewer than three bedrooms. The availability of units in a variety of sizes for both renters and homeowners is important to provide for the needs of the community.

Source: 2015-2019 American Community Survey 5-Year Estimates

### **Describe the number and targeting (income level/type of family served) of units assisted with federal, state and local programs.**

In the Consolidated Plan period, the Town will not be addressing affordable housing activities with CDBG funds. As funds are limited, the Town will target funds towards the priorities of public services and 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/Mod areas.

The Town of Castle Rock falls within the Douglas County Housing Partnership (DCHP) service area, which serves Douglas County. According to the Public and Indian Housing (PIH) Information Center, there are 376 vouchers in use. While the total number of HCV vouchers is 376, not all of these are used in Castle Rock.

### **Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

According to the HUD Multi-family Assistance and Section 8 Database, there are two contracts located in Castle Rock. Both are set to expire in the next five years.

#### Castle Creek Commons East

- Contract Expiration: 2026
- Affordable Units: 20

#### Reyn Rock Apartments

- Contract Expiration: 2022
- Affordable Units: 33

#### **Does the availability of housing units meet the needs of the population?**

No, in Castle Rock there is a need for affordable housing. As discussed in the Needs Assessment, there are a number of households that are cost burdened.

#### **Describe the need for specific types of housing:**

In Castle Rock, there is a limited supply of units for homeowners that are smaller than three bedrooms. Smaller units, particularly when in a multi-family development, are generally less expensive and provide opportunities for first time homeowners and retired residents who are downsizing. Considering the prevalence of elderly residents who are cost burdened, it could be beneficial to expand the supply of smaller, more affordable owner-occupied units.

## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

The following section examines the cost of housing for both homeowners and renters within Castle Rock. A review is made of current home values and rents as well as the recent changes in home values and rents. Finally, a closer look is given to the affordability of the existing housing stock for the residents of the jurisdiction.

### Cost of Housing

	Base Year: 2000	Most Recent Year: 2019	% Change
Median Home Value	281,300	422,100	50%
Median Contract Rent	933	1,403	50%

Table 28 – Cost of Housing

Alternate Data Source Name:  
2006-2000 ACS, 2015-2019 ACS

Rent Paid	Number	%
Less than \$500	110	2%
\$500-999	567	12%
\$1,000-1,499	1,583	34%
\$1,500-1,999	1,331	28%
\$2,000 or more	1,123	24%
<i>Total</i>	4,714	100%

Table 29 - Rent Paid

Alternate Data Source Name:  
2015-2019 ACS

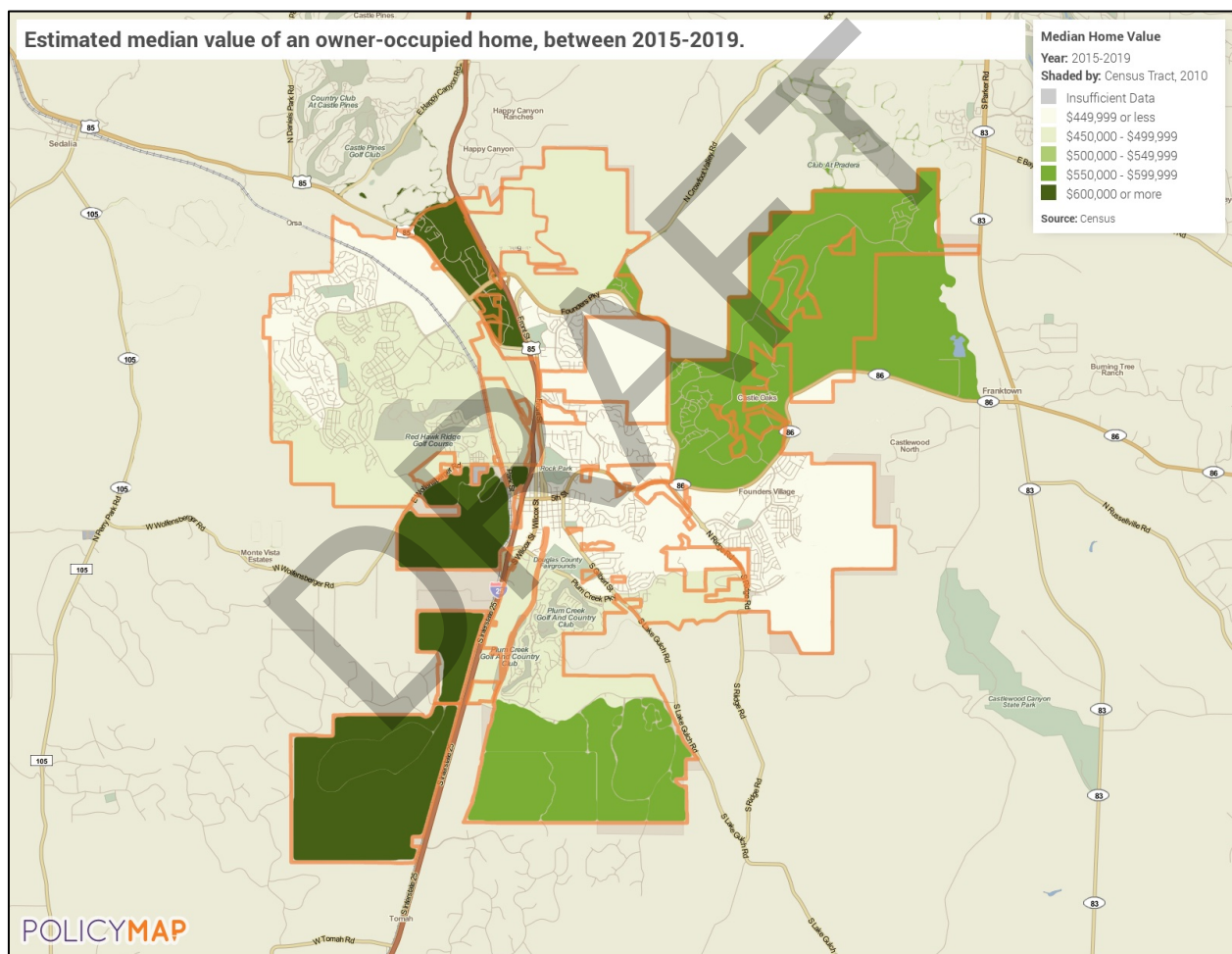
### Housing Costs

Since 2000, the median home value and median contract rent have both increased by 50%. The table above breaks out the rent paid by price cohorts in the Town. Approximately 34% of all renters pay between \$1,000 and \$1,499 a month, the largest cohort in the Town. The next largest rent cohort is \$1,500 to \$1,999 with 28% of renters falling in this range.

## Home Value

The map below shows the median home value by census tract throughout the jurisdiction. The highest median home value is found in tracts to the southwest and north where the median value is over \$600,000. These tracts border relatively low median home value tracts where the median value is less than \$450,000. It must be noted that the southern tracts are predominantly open space and undeveloped land and the data may be skewed towards higher value homes in the area. Also of note is that the northern tract in dark green is a commercial area, and the tracts north of that area are part of one of the wealthiest areas in Colorado.

Source: 2015-2019 American Community Survey 5-Year Estimates



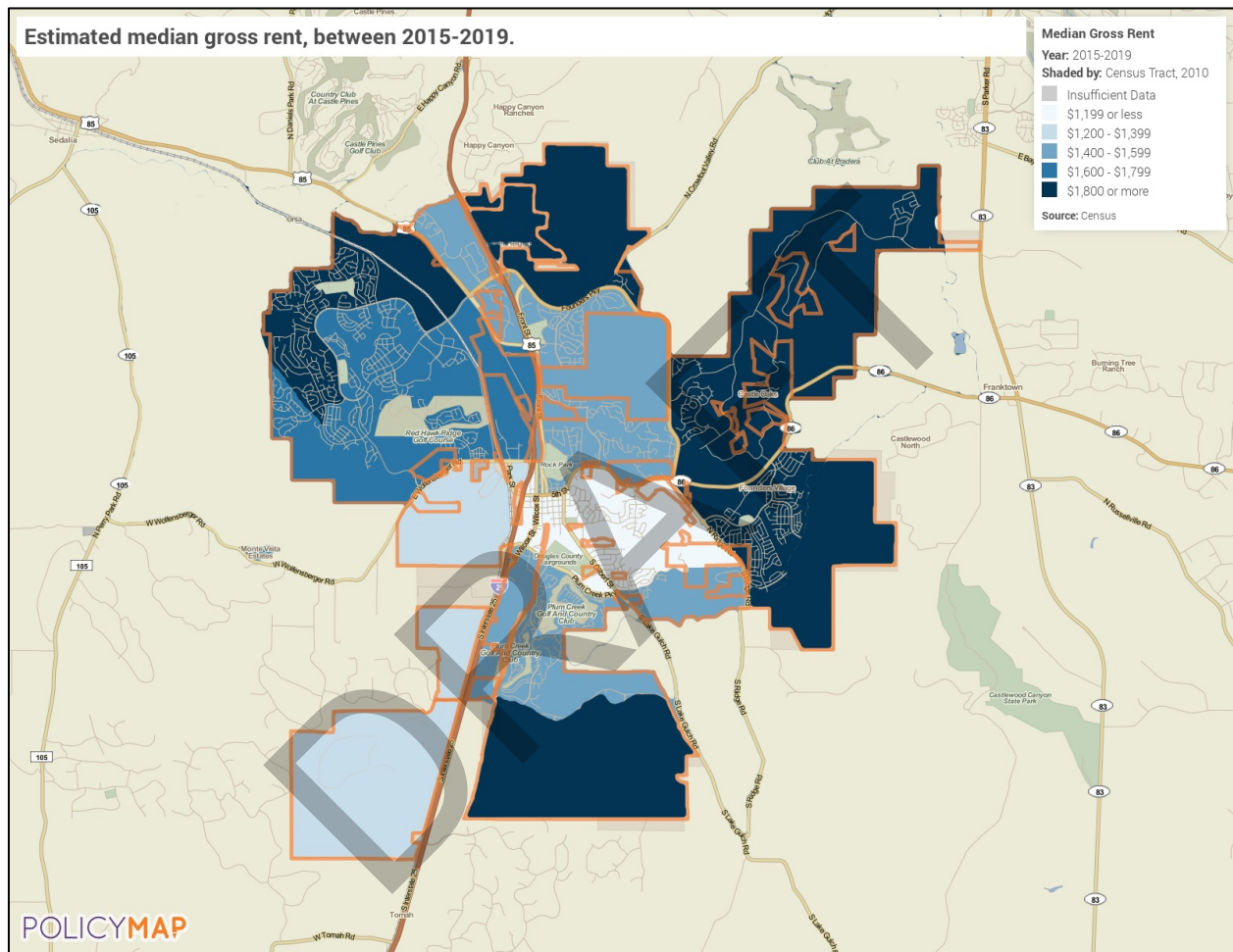
**Median Home Value**



## Median Rent

The map below displays the median rent by census tract. The outer tracts report the highest median rent, over \$1,800. The lowest rent is found in the center of the Town where it is less than \$1,200.

Source: 2015-2019 American Community Survey 5-Year Estimates



## Median Rent

Supplemental Data for Housing Affordability below:

### Household Income by Tenure in Douglas County

	Owner	Estimate	Renter	Estimate
Less than \$20,000	424	3%	408	9%
\$20,000 to \$34,999	564	3%	826	18%
\$35,000 to \$49,999	891	5%	591	13%
\$50,000 to \$74,999	1906	12%	913	19%
\$75,000 or more	12772	77%	1962	41%
Total	16557	100%	4700	100%
Zero, negative or no cash (for renters), not computed	19	--	60	--
Data Source: 2015-2019 ACS (B25106)				

### Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$1114	\$1260	\$1566	\$2163	\$2488
High HOME Rent	\$1114	\$1199	\$1441	\$1656	\$1828
Low HOME Rent	\$875	\$937	\$1125	\$1300	\$1450

Table 30 – Monthly Rent

Alternate Data Source Name:  
2020 HUD FMR and HOME Rent Limit

### HOME Rents Limits and Fair Market Rents (FMR)

Fair Market Rents (FMRs) are set by HUD and used to determine payment standard amounts for HUD Programs. HUD annually estimates FMRs for the Office of Management and Budget (OMB) defined metropolitan areas, some HUD defined subdivisions of OMB metropolitan areas and each nonmetropolitan county.

HOME Rents Limits are based on FMRs published by HUD. HOME Rent Limits are the maximum amount that may be charged for rent in HOME-assisted rental units and are applicable to new HOME leases.

Douglas County is part of the Denver-Aurora-Lakewood, CO Metropolitan Statistical Area (MSA)



### **Is there sufficient housing for households at all income levels?**

The housing stock in Castle Rock is relatively expensive and cost burden is a significant issue, particularly for lower income households. There is not sufficient housing available for LMI households, particularly extremely low income households. Additional housing units that are affordable to lower income households would help alleviate cost burden and other housing problems.

### **How is affordability of housing likely to change considering changes to home values and/or rents?**

It is difficult to project exactly how housing affordability will change, but it is unlikely that housing will become more affordable without a significant change in the current environment. Median home values and rents continue to rise more quickly than incomes, making homes less affordable.

### **How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?**

The median contract rent for the units in Castle Rock is \$1,403. The median contract rent is less than the 2-bedroom Fair Market Rent and High HOME rent and less than 4-bedroom Low HOME rent. This information will be used to determine the appropriate size and pricing for the development of affordable units in the Town.

DRAFT

## **MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)**

### **Introduction**

The tables and maps in this section provide details on the condition of housing units throughout the region by looking at factors such as age, vacancy and the prevalence of housing problems.

As defined by HUD, the four housing problems are:

- 1) a home which lacks complete or adequate kitchen facilities
- 2) a home which lacks complete or adequate plumbing facilities
- 3) a home which is overcrowded (having more than one person per room)
- 4) a household that is cost burdened (paying 30% or more of their income towards housing costs)

### **Definitions**

For the purposes of this plan, units are in “standard condition” when the unit is in compliance with the local building code, which is based on the International Building Code.

The definition of substandard housing is a housing unit with one or more serious code violations. For the purposes of this analysis, the lack of complete plumbing or a complete kitchen will also serve as an indicator of substandard housing.

Units are in “substandard condition but suitable for rehabilitation” when the unit is out of compliance with one or more code violations, and it is both financially and structurally feasible to rehabilitate the unit.

## Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	3,414	21%	2,186	46%
With two selected Conditions	21	0%	231	5%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	13,141	79%	2,343	49%
<b>Total</b>	<b>16,576</b>	<b>100%</b>	<b>4,760</b>	<b>100%</b>

**Table 31 - Condition of Units**

Alternate Data Source Name:  
2015-2019 ACS

## Housing Conditions

The table above details the number of owner and renter households that have at least one housing condition. As stated previously, HUD describes four housing conditions as being problems: 1) the home lacks complete or adequate kitchen facilities, 2) the home lacks complete or adequate plumbing facilities 3) the home is overcrowded - defined as more than one person per room, 4) the household is cost burdened by paying more than 30% of their income towards housing costs.

Twenty-one percent of all owner-occupied housing units face at least one housing condition while 46% of all renters have at least one housing condition. Generally speaking, there are relatively few households with multiple housing problems; and, when compared to the affordability statistics provided earlier in this section, it is clear that the majority of housing problems are housing cost burden.

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	11,290	68%	2,183	46%
1980-1999	4,369	26%	1,983	42%
1950-1979	848	5%	390	8%
Before 1950	69	0%	204	4%
<i>Total</i>	16,576	99%	4,760	100%

**Table 32 – Year Unit Built**

Alternate Data Source Name:  
2015-2019 ACS

## Year Unit Built

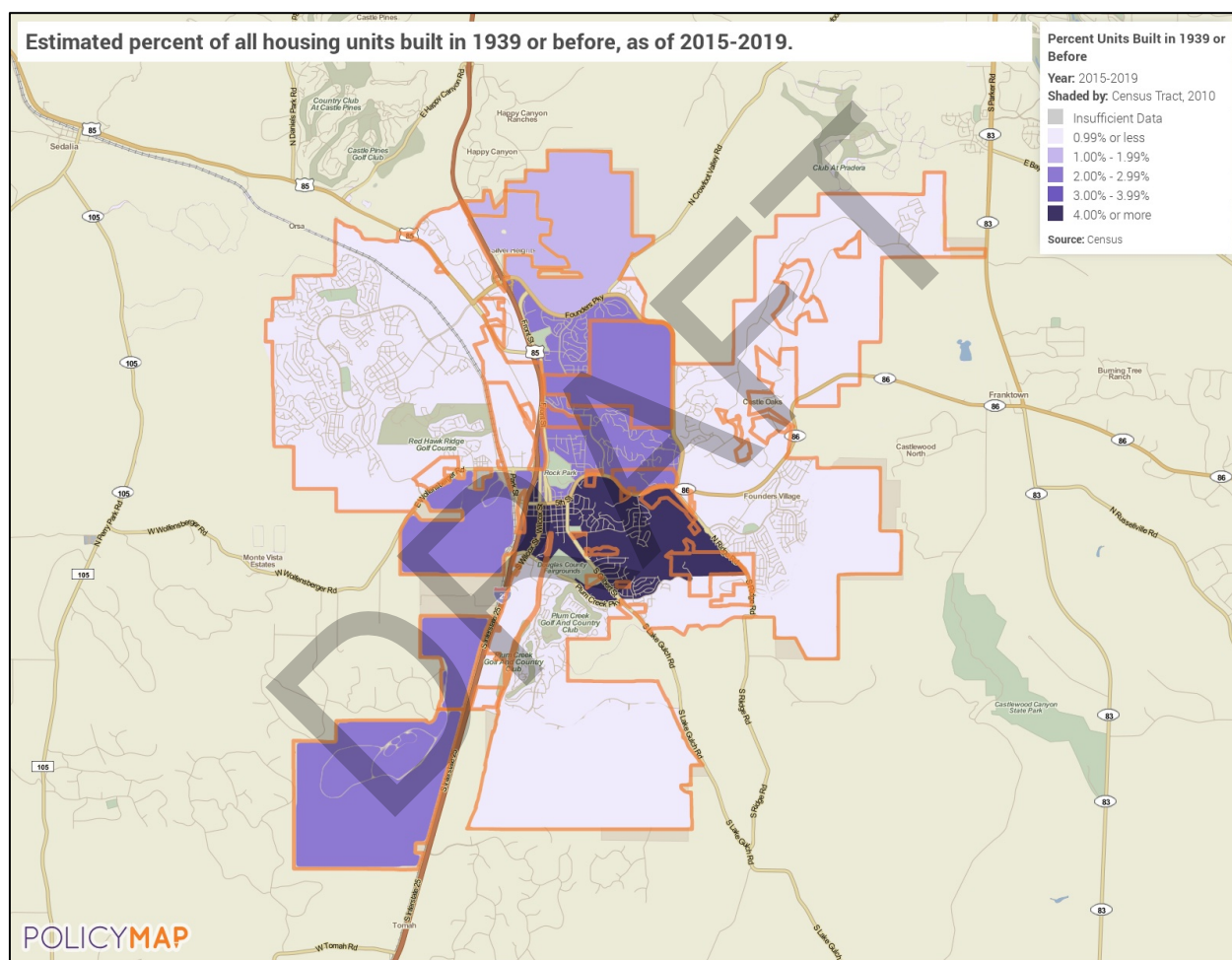
In Castle Rock, the majority of housing units were built after 1980 including nearly 95% of owner-occupied units and 88% of rental units. Units built prior to 1980 may have a risk of lead-based paint. The risk of lead-based paint is minimal in Castle Rock, though it is more prevalent in rental units than owner-occupied units.

Source: 2015-2019 American Community Survey 5-Year Estimates

## Age of Housing

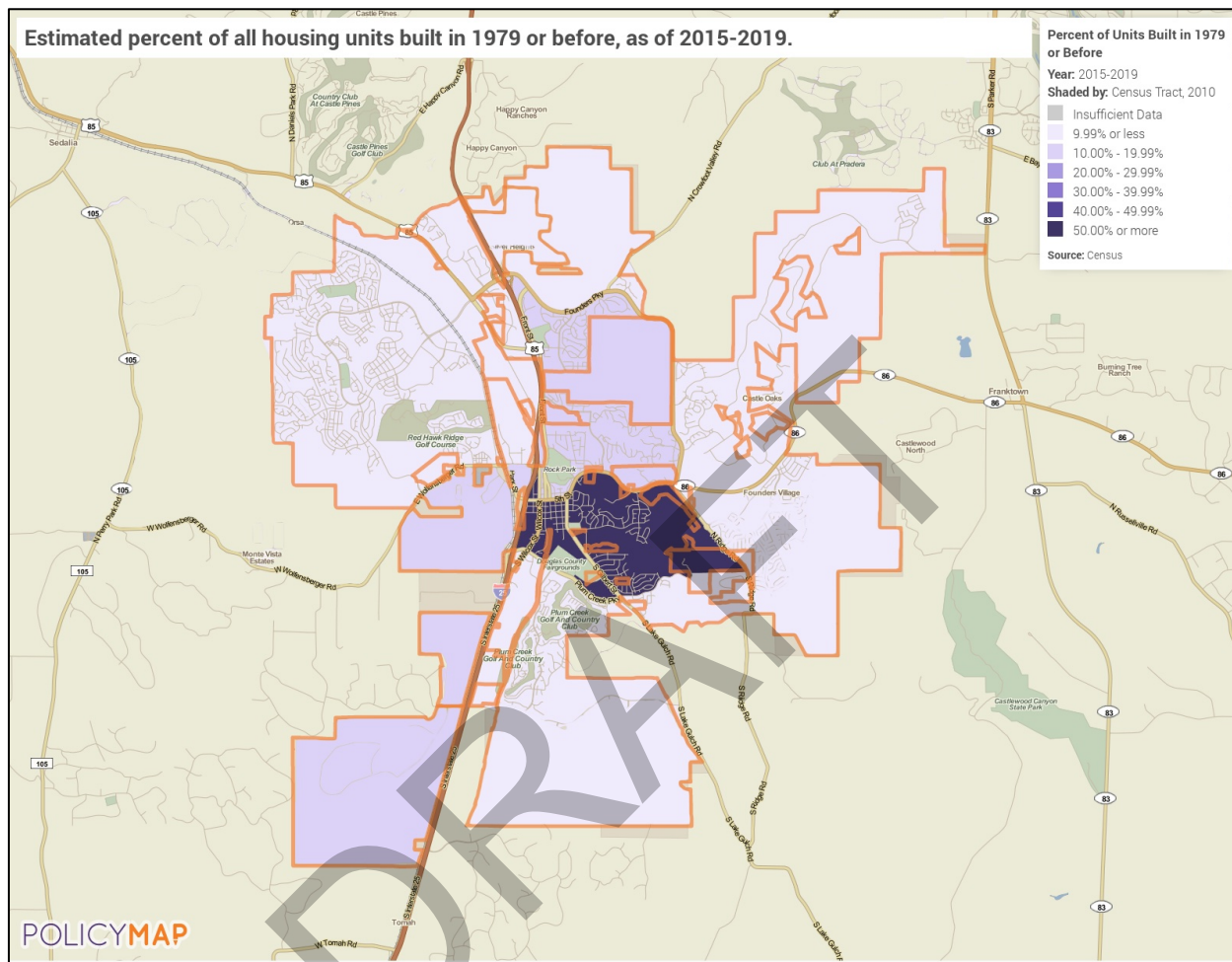
The maps below depict the prevalence of older housing units in the Town. The first map shows where units built prior to 1940 are concentrated. As noted above, the housing stock in Castle Rock is relatively new and there are very few units built prior to 1940. The largest concentration is in the central part of the Town and it is the only place where more than 4% of the housing units were built prior to 1940.

Source: 2015-2019 American Community Survey 5-Year Estimates



**Housing Units Built Before 1940**

Units built prior to 1980 show the same concentration as those built prior to 1940. In the central part of the Town, there is one place where over 50% of the units are built prior to 1980. Throughout the rest of the Town, less than 20% of the units were built prior to 1980.



**Housing Units Built Before 1980**

### Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	917	5%	594	12%
Housing Units build before 1980 with children present	N/A	N/A	N/A	N/A

**Table 33 – Risk of Lead-Based Paint**

**Data Source:** 2015-2019 ACS (Total Units Built Before 1980)

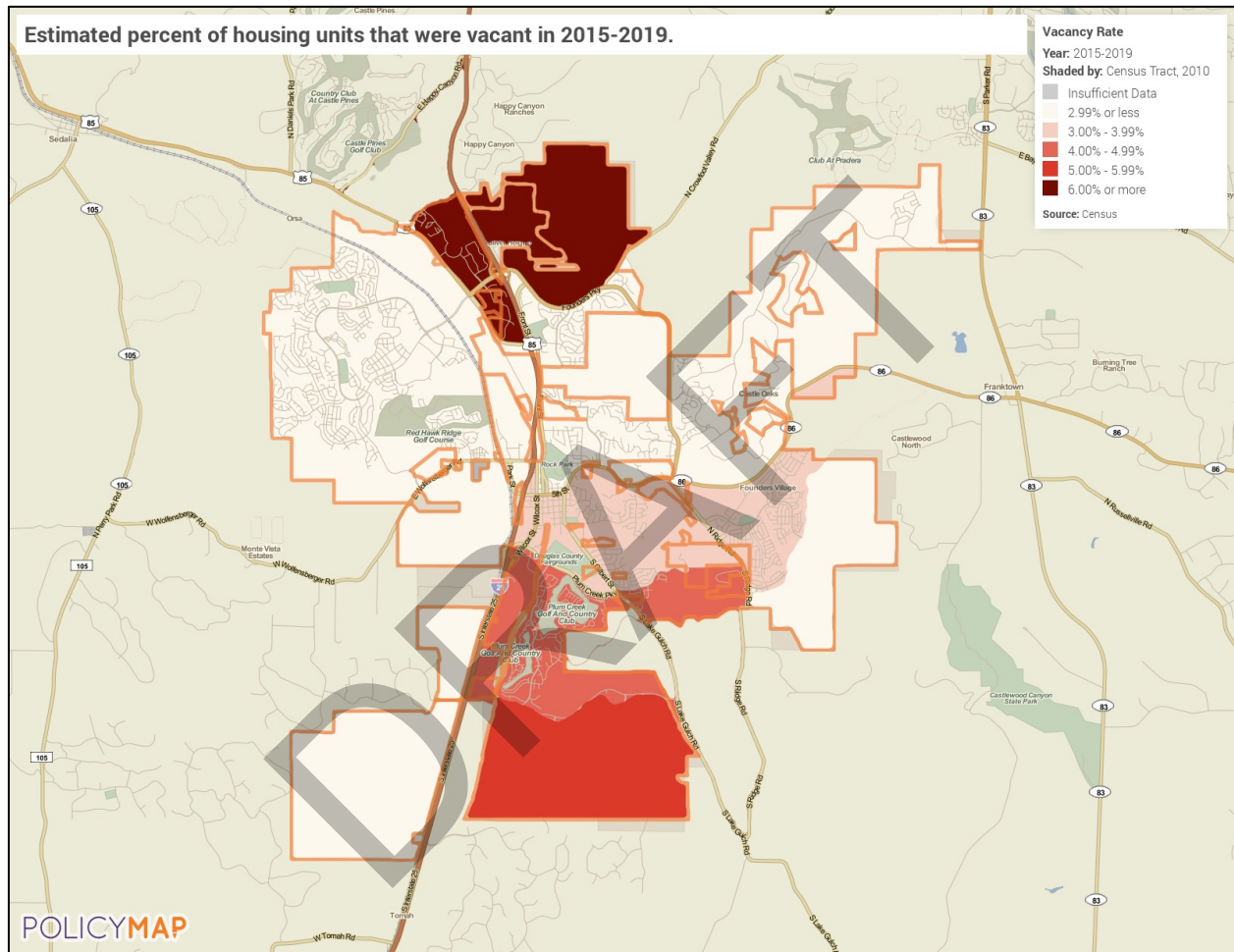
### Lead-Based Paint Hazard

As mentioned previously, any housing unit built prior to 1980 may contain lead-based paint in portions of the home. The most common locations are window and door frames, walls and ceilings, and in some cases throughout the entire home. Thus, it is generally accepted that these homes at least have a risk of lead-based paint hazards and should be tested in accordance with HUD standards. The greatest potential for lead-based paint and other environmental and safety hazards is in homes built before 1980. Within the Town, there are approximately 1,500 units with the risk of lead-based paint.

## Vacancy Rate

The map below shows the average housing vacancy rates throughout the Town. The darker shaded areas have higher vacancy rates, while the lighter shaded areas have lower vacancy rates. In most census tracts throughout the Town, vacancy rates are less than 6%.

Source: 2015-2019 American Community Survey 5-Year Estimates



## Vacancy Rate



### **Need for Owner and Rental Rehabilitation**

In Castle Rock, there is a potential need for rehabilitation for both homeowners and renters. The housing supply is relatively young, but many units may still be in need of support. Of particular concern are any low-income households that may lack the resources to properly rehabilitate their homes.

### **Estimated Number of Housing Units Occupied by Low or Moderate Income Families with LBP Hazards**

To estimate the number of housing units in the Town by low- or moderate-income families that may contain lead-based paint hazards, this report assumes that homes by year built are distributed evenly across income categories, as no local data exists to describe otherwise. According to CHAS, approximately 32% of all households are LMI and an estimated 484 live in units with potential LBP Hazards.

DRAFT

## MA-25 Public and Assisted Housing – 91.210(b)

### Introduction

Publicly supported housing was established to provide decent and safe rental housing for eligible low-income families, the elderly and persons with disabilities. Castle Rock is served by the Douglas County Housing Partnership, 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. The Town does not have any public housing.

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	0	0	110	0	110	0	0	0
# of accessible units	0	0	0	0	0	0	0	0	0

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 38 – Total Number of Units by Program Type

Alternate Data Source Name:

Public and Indian Housing Information Center (PIC)

### Describe the supply of public housing developments:

The Town does not have any public housing developments.

### Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

N/A

**Describe the restoration and revitalization needs of public housing units in the jurisdiction:**

N/A

**Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:**

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

DRAFT

## MA-30 Homeless Facilities and Services – 91.210(c)

### Introduction

The Town of Castle Rock is located in Douglas County, and in Douglas County the needs of people and families facing homelessness are found through a variety of ways such as regular communication between shelters, support housing providers, a strong local health and service network, annual point-in-time counts and needs surveys. The Metro Denver Continuum of Care (CoC) is a regional system that coordinates services and housing for people experiencing homelessness with the seven counties in the Continuum, which includes Douglas County. The included data was provided by the Metro Denver Homeless Initiative for Douglas County.

### Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	7	8	16	0	0
Households with Only Adults	0	0	0	0	0
Chronically Homeless Households	0	0	0	0	0
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

**Table 34 - Facilities and Housing Targeted to Homeless Households**

2020 PIT Count. Data provided by the Metro Denver Homeless Initiative (MDHI) for Douglas County.

Data Source  
Comments:

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

Homeless persons may access healthcare by contacting Douglas County Human Services, Doctors Care, the Metro Community Provider Network and Tri-County Health Department. The Douglas/Elbert County Task Force (D/ETF) collaborates with Castle Oaks Church to ensure Grátis Medical is available on site for clients. This service includes free medical and prescription assistance two evenings per month. For mental health assistance, residents may call the Arapahoe/Douglas Mental Health or Arapahoe House.

Employment services are available through Arapahoe/Douglas Works! Their main office is located in Arapahoe County and a satellite office with limited services is located at the Sturm Collaboration Campus. This location serves those living in the southern portion of the county. The ARC Arapahoe and Douglas Counties provides individual and systems advocacy, and educational workshops and trainings for people with intellectual and developmental disabilities and their families.

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

Winter Weather Care shelter program has options in winter months, and persons experiencing homelessness can apply for hotel vouchers at one of the following agencies:

- Catholic Charities
- Help and Hope Center
- Parker Task Force
- SECOR Cares
- Winter Shelter Network
- Women and children may obtain shelter through the Winter Shelter Network offered by local churches

## **MA-35 Special Needs Facilities and Services – 91.210(d)**

### **Introduction**

There are four primary groups with non-homeless special needs in the Town. They are the elderly and frail elderly, those with HIV/AIDS and their families, those with alcohol or drug addiction, and the mentally or physically disabled. This section will explain what their needs are and how the Town is accommodating those needs when possible.

**Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify and describe their supportive housing needs**

**Elderly:** The supportive housing needs for this population can vary widely depending on the health, financial situation, and overall fitness of the individuals. Disabilities become more common with aging and because of this, supportive housing should consider access to health professionals and housing modifications to assist the resident. It is important to help residents stay independent and in their own homes for as long as possible.

**HIV/AIDS:** Medical and social support is important for residents living with HIV/AIDS. While there have been great advances in the medical treatment of HIV/AIDS, it is still important to provide specialized support. Family and friends must be accessible and medical facilities should be nearby.

**Alcohol and/or Drug Addiction:** Individuals dealing with addiction often require housing options that will provide a safe, sober place for recovery. A strong network is necessary to maximize the chance they will stay healthy and sober. It is important that these persons have access to health services, support groups, employment assistance, and access to family and friends. Additionally, detoxification facilities are necessary when addiction is first recognized.

**Mental and Physical Disabilities:** Individuals with disabilities encompass a wide range of skill levels and abilities. Therefore, they have many of the same issues as the general population with the added needs that are unique to their situation. Often, individuals with disabilities have a fixed income and limited housing options. Individuals with more independent skills can utilize subsidized housing, but individuals that need more support or specialized housing have fewer options. Many individuals continue to reside with parents and families throughout adulthood, which can put additional financial burden on the family. As parents age, they worry about who will care for their adult children with disabilities who are unable to live alone. Regardless of the housing situation, a common thread is the need to offer continuous support services dependent on the level of capabilities.

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

The Arapahoe Douglas Mental Health Network (ADMHN) provides a wide range of mental health and substance abuse services through a variety of treatment programs. The Bridge Acute Treatment Unit (ATU) provides crisis and emergency short-term residential care for patients transferring from inpatient facilities. This ADMHN facility has 16 beds available and offers an alternative to a psychiatric hospital stay for Douglas County residents.

ATU's treatment goal is to help stabilize clients before they transition back into the community. During their stay, clients learn how to manage their medication and have the opportunity to visit a psychiatrist or prescribing nurse daily. Around-the-clock nursing and a dedicated weekend social worker ensures that clients' needs are being met. Individuals spend an average of seven days in the ATU. Care managers are available to help residents transition back into independent living through ADMHN's Community Support Program.

ADMHN is also beginning a new partnership with the Colorado Division of Housing, where residents exiting a State hospital meet with a social worker, and depending upon availability, may be provided long-term housing assistance through the State Housing Voucher Program. Colorado's Second Chance Housing and Rehabilitation is another program which offers services to help those exiting a State Hospital, through the Department of Corrections, to safely and successfully transition into the community.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

The Town will work to provide for supportive services that improve the quality of life for the elderly living in Castle Rock. Supportive services for the elderly include activities such as independent living services, health and self-sufficiency assistance. The Town will also 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 residents include activities such as services for persons with a disability, youth services, vulnerable population groups, job training, emergency assistance and health services.

To support these activities, the Town has created two goals in its strategic plan and annual action plan one-year goals. The goals are:

Goal: 2A. Provide Supportive Services for Seniors

Goal: 2B. Provide Supportive Services for LMI and Special Needs

## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

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. The Master Plan identified “Responsible Growth” as a key housing and residential investment related finding in Castle Rock. Responsible Growth is one of the four cornerstones that make up the building blocks of the Town’s vision along with a Distinct Town Identity, Community Services and a Thriving Economy. To effectively support this key focus area the Town created principles and strategies to guide future development of growth in Castle Rock.

**Responsible Growth (RG):** 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 residents. Castle Rock plans for responsible development that accommodates 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 are a list of guiding principles for responsible growth. Detailed implementation strategies are provided in the 2030 Master Plan.

RG Principles:

RG-1: Active participation in local and regional discussions surrounding growth and development.

RG-2: Annexation of areas with the potential to accommodate growth in a fiscally and environmentally sound manner.

RG-3: Cohesive neighborhoods, with a mix of land uses that offer a variety of lifestyle options for Castle Rock residents and meet the short- and long-term needs of the community while creating a place where people can live, work, and play.

RG-4: Orderly, cost-effective, equitable and fiscally responsible growth.

RG-5: Infill development that is sensitive to the scale and character of the surrounding neighborhoods.

RG-6: Promoting compatible downtown development.

RG-7: An integrated multimodal transportation system that allows for the safe and efficient movement of people and goods.

RG-8: Protection and conservation of natural resources, sensitive areas, ridgelines and areas of open space throughout the Town.

RG-9: Continue to secure a renewable water supply to serve the long-term needs of the community.



## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

This section provides insight into the economic development landscape of the Town of Castle Rock. The table below details the extent of business sector employment throughout the Town. Unemployment, commuting times and education are also analyzed in this section.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	414	13	1	0	-1
Arts, Entertainment, Accommodations	2,837	2,485	9	11	2
Construction	2,246	1,835	7	8	1
Education and Health Care Services	6,016	9,107	19	39	20
Finance, Insurance, and Real Estate	3,252	676	10	3	-7
Information	1,681	584	5	3	-2
Manufacturing	1,464	242	5	1	-4
Other Services	1,500	671	5	3	-2
Professional, Scientific, Management Services	4,601	1,908	14	8	-6
Public Administration	1,930	2,289	6	10	4
Retail Trade	3,900	2,849	12	12	0
Transportation and Warehousing	1,150	110	4	0	-4
Wholesale Trade	933	466	3	2	-1
Total	31,924	23,235	--	--	--

**Table 35 - Business Activity**

Alternate Data Source Name:

2014-2018 ACS (Workers), 2018 LEHD (All Jobs)

Data Source

Comments:

The Business Activity table above compares the number of workers to the number of jobs in the Town. At this time, the most recent data set for the number of jobs was 2018 from the Longitudinal Employer-Household Dynamics (LEHD), US Census Bureau. Data from the 2014-2018 ACS 5-Year estimates was used for comparison.

## Share of Workers and Jobs

In the above table, the prevalence of both workers and jobs by sector is presented. In the Town, there are approximately 8,700 more workers than jobs. This means that at least 8,700 residents must travel outside the Town for work. There is one sector that stands out due to the disparity between jobs and workers. The Education and Health Care Services Sector makes up nearly 40% of the jobs but only 19% of the workers. In total, there are over 3,000 more jobs than workers in that sector.

## Labor Force

Total Population in the Civilian Labor Force	34,590
Civilian Employed Population 16 years and over	33,591
Unemployment Rate	4.7
Unemployment Rate for Ages 16-24	5.1
Unemployment Rate for Ages 25-65	2.5

**Table 36 - Labor Force**

Alternate Data Source Name:

2015-2019 ACS

Data Source

Comments:

Unemployment Rate data is from the BLS, November 2020. All other labor force data is from the 2015-2019 ACS including unemployment rate by age.

## Unemployment

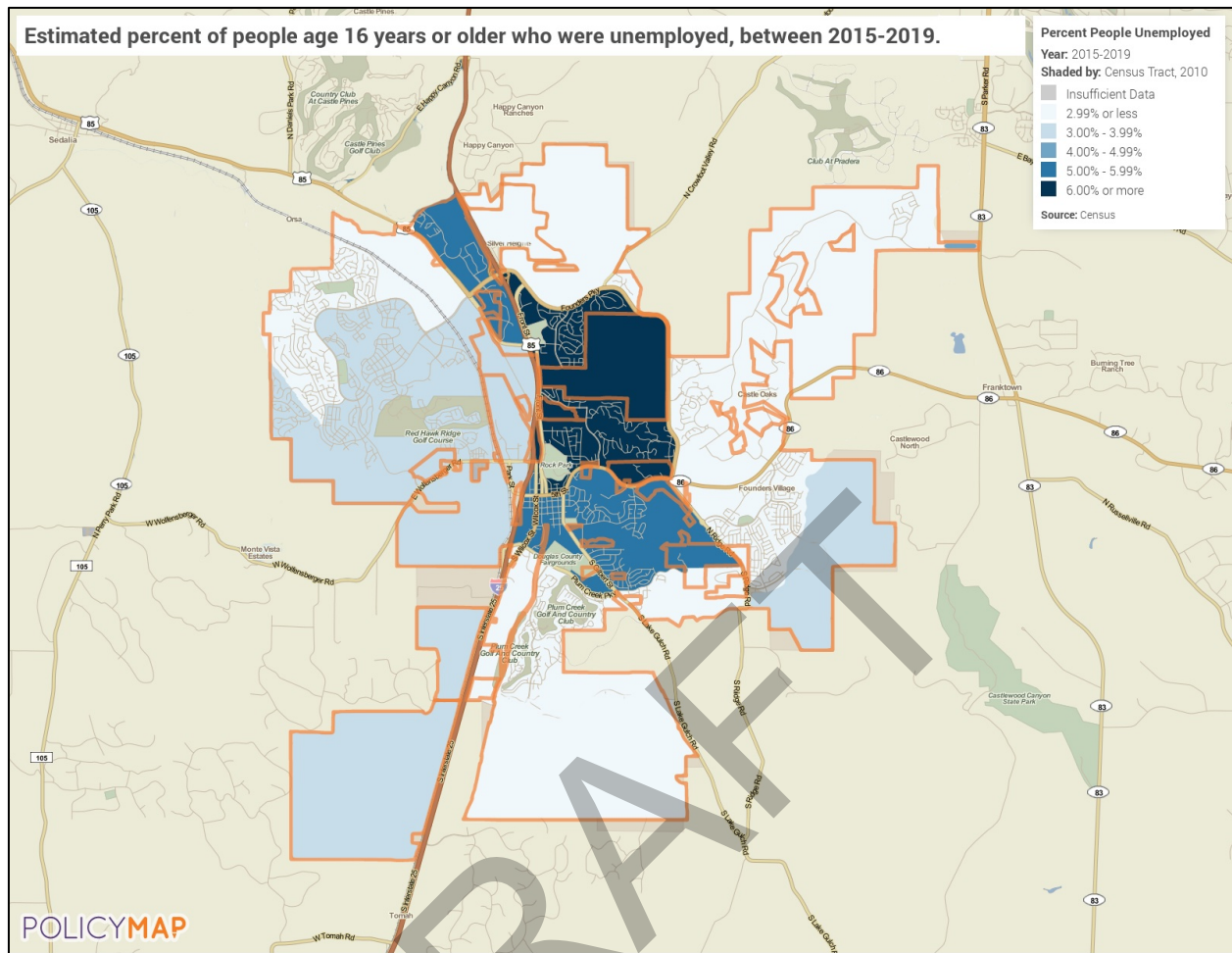
There are two primary sources used to analyze the unemployment rate in the Town for this report. They each have pros and cons, but when taken together they can provide a clearer view of unemployment in the Town.

The first source is the US Census Bureau's American Community Survey 5-Year Estimates. In the ACS, unemployment data is only taken annually and the most recent data is from 2019. It is also an average of the five years included, which does not necessarily provide an accurate view of recent employment trends. However, the ACS data is available at a census tract level and can help identify any areas that have disproportionately high unemployment.

The second source is the Bureau of Labor Statistics. This measurement of unemployment is updated monthly and provides insight into any trends at the town level. It is not available at the census tract level and therefore provides a look at employment as it relates to time, while the ACS looks at employment as it relates to space.

In the Town, the unemployment rate does not vary significantly based on location. In most of the Town, the unemployment rate is under 6%. There is only one area, in the north central part of the Town, where the unemployment rate is higher.

Source: 2015-2019 American Community Survey 5-Year Estimates



## Unemployment by Census Tract

## Unemployment Over Time

When looking at unemployment changes over time, the Town has seen its unemployment rate fall consistently. As of this writing, the annual unemployment rate has not been determined for 2020 yet but looking at the monthly breakdown there is a pattern of an increased unemployment rate in April through June, and then a steady decline. This is likely due to the global COVID-19 Pandemic that lead to a contraction of economic activity throughout the world.

Table: BLS Unemployment by Year

2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
8.8	6.9	6.4	5.5	4.1	3.3	2.8	2.4	2.7	2.5

Table: BLS Unemployment by Month, January to November 2020

Jan	Feb	Mar	Apr	May	June	July	Aug	Sept	Oct	Nov
2.5	2.6	4.7	10.7	8.5	9.0	5.9	5.2	4.7	4.7	4.7

Occupations by Sector	Number of People
Management, business and financial	16,106
Farming, fisheries and forestry occupations	12
Service	5,421
Sales and office	7,716
Construction, extraction, maintenance and repair	1,943
Production, transportation and material moving	2,393

**Table 37 – Occupations by Sector**

Alternate Data Source Name:  
2015-2019 ACS

### Occupations by Sector

In the above table, the occupations by sector is analyzed. Instead of showing which sectors are most common in the Town, as the table at the beginning of this section did, this shows what type of jobs are available in each sector. For example, this table would include a manager of a fast food restaurant and the manager of a logging company in the same category (Management, Business, and Financial) while in the earlier table (Table 35) they would be in separate categories.

Within the Town, the most prominent sector is the Management, Business, and Financial sector. Nearly 48% of all jobs in the Town fall into this category. The Sales and Office sector is the second largest with 7,716 people.

### Travel Time

Travel Time	Number	Percentage
< 30 Minutes	15,369	51%
30-59 Minutes	12,001	40%
60 or More Minutes	2,707	9%
<i>Total</i>	30,077	100%

**Table 38 - Travel Time**

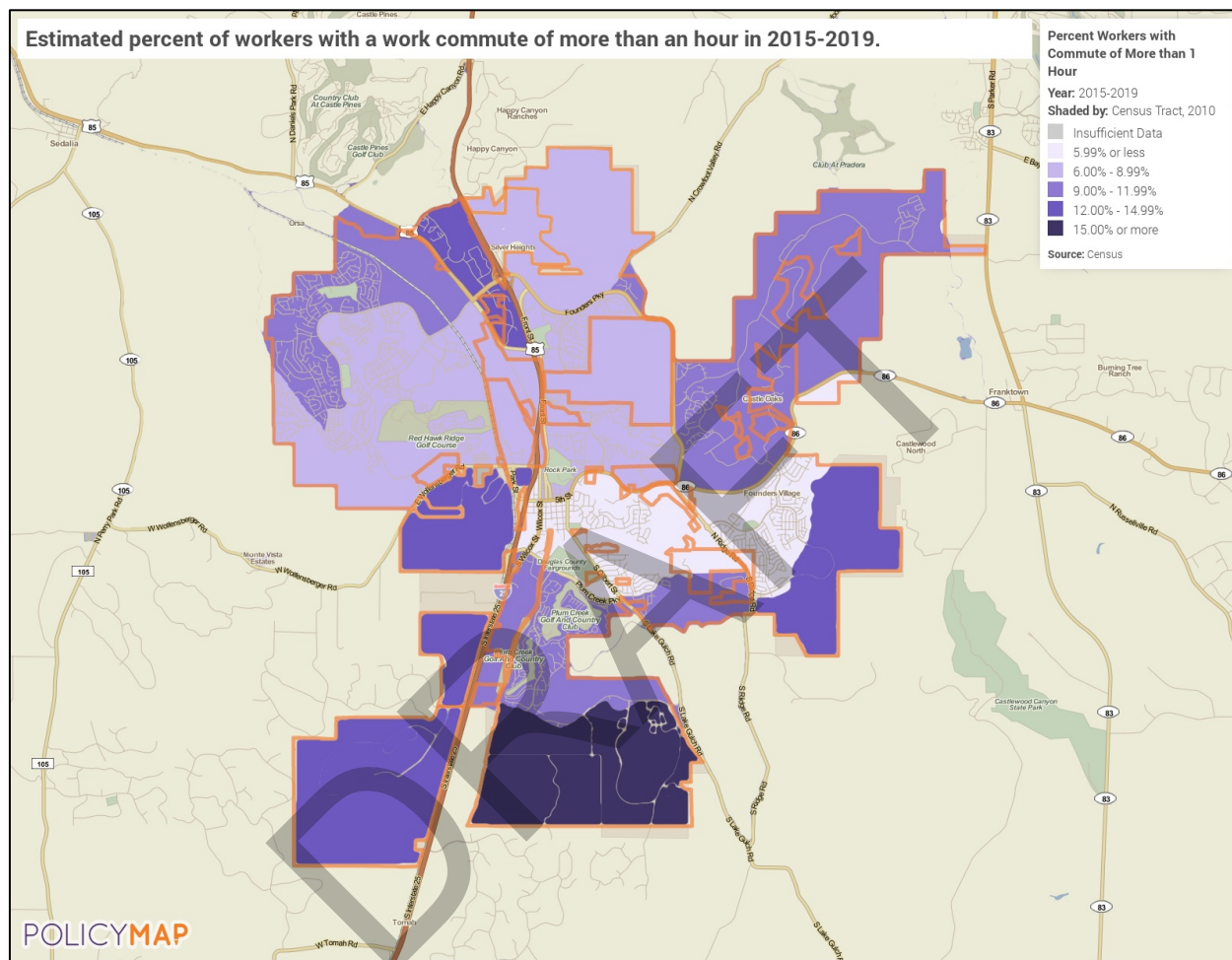
Alternate Data Source Name:  
2015-2019 ACS

### Commute Travel Time

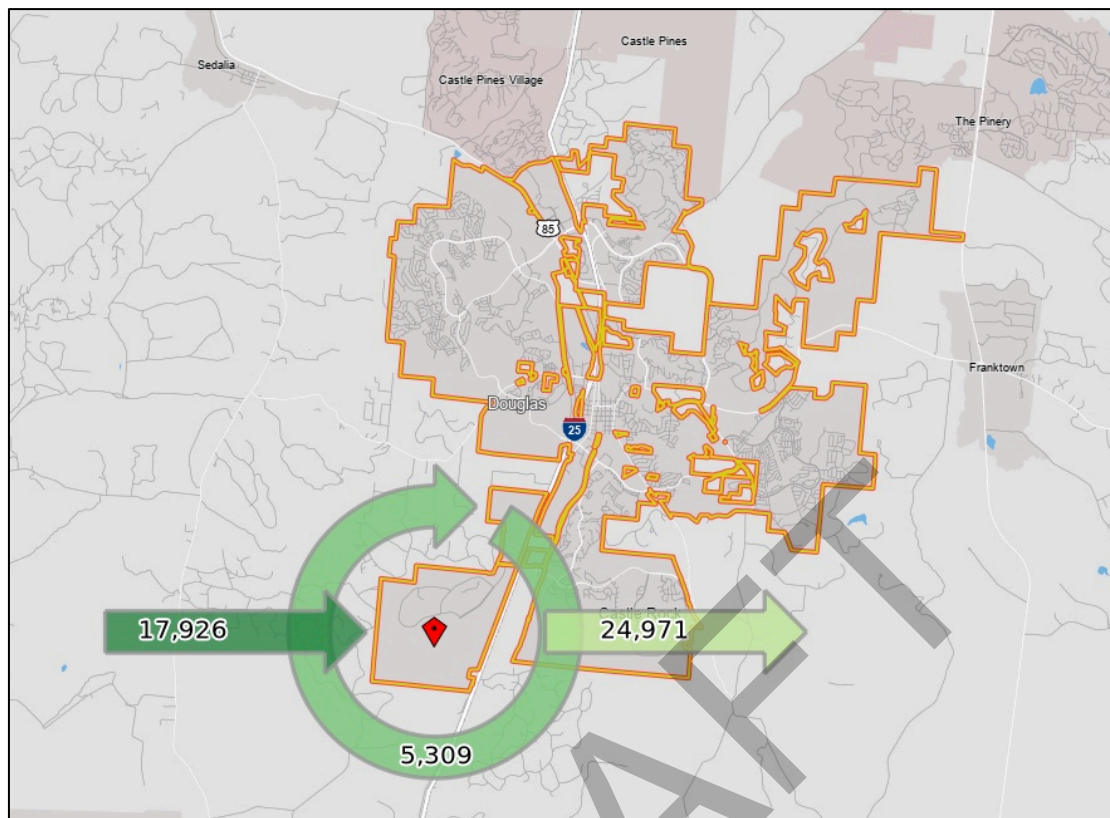
All other things being equal, residents would rather live in the same city as their job. Relative to short commutes, long commute times are associated with lower life satisfaction, increased stress, obesity, anxiety, depression, and increased exposure to pollutants. This is particularly true when compared to commuters who use bicycles or walk to work.

In the Town, long commute times are not a significant issue. Approximately half of the population commutes less than 30 minutes and only 9% people reported a commute of an hour or longer. Residents who live in the central part of the Town were the least likely to report a commute of an hour or more.

Source: 2015-2019 American Community Survey 5-Year Estimates



### Commute Travel Time Greater Than One Hour



### Inflow and Outflow of Jobs

As noted above, there is a disconnect between the number of jobs and the number of workers in Castle Rock. In the Town, only 17.5% of the labor force both works and lives in Castle Rock. Nearly 25,000 people leave the Town for work and another 18,000 commute into the Town as of 2018.

Data Source: 2018 LEHD OnTheMap

### Inflow and Outflow of Jobs Table

2018	Count	Share
In-Area Labor Force Efficiency (All Jobs)		
Living in the Selection Area	30,280	100.0%
Living and Employed in the Selection Area	5,309	17.5%
Living in the Selection Area but Employed Outside	24,971	82.5%
In-Area Employment Efficiency (All Jobs)		
Employed in the Selection Area	23,235	100.0%
Employed and Living in the Selection Area	5,309	22.8%
Employed in the Selection Area but Living Outside	17,926	77.2%
Data Source: 2018 LEHD OnTheMap		

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	401	40	286
High school graduate (includes equivalency)	3,256	169	938
Some college or Associate's degree	9,672	307	1,842
Bachelor's degree or higher	14,187	297	2,015

**Table 39 - Educational Attainment by Employment Status**

Alternate Data Source Name:  
2015-2019 ACS

### Educational Attainment by Employment Status

Educational attainment is one of the best indicators of economic success, both in attaining a job and receiving a higher wage. In the Town, the unemployment rate for a person without a high school diploma is 9.1% while the rate for a resident with a bachelor's degree or higher is only 2.1%. The labor participation rate is also higher for those with higher educational attainment. Approximately 60.7% of residents without a high school diploma are in the workforce, which is lower than the workforce participation rate of 87.8% for those with bachelor's degrees.

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	106	22	74	117	129
9th to 12th grade, no diploma	628	140	126	232	131
High school graduate, GED, or alternative	1,955	1,208	1,283	1,833	1,399
Some college, no degree	1,415	1,667	2,133	4,133	1,573
Associate's degree	264	759	978	2,139	411
Bachelor's degree	489	2,842	3,630	4,986	1,495
Graduate or professional degree	17	1,023	1,759	2,276	1,074

**Table 40 - Educational Attainment by Age**

Alternate Data Source Name:  
2015-2019 ACS

### Educational Attainment by Age

In Castle Rock, residents under the age of 25 are much more likely to not have a high school diploma than

other age groups. Over 15% of 18 to 24 year old residents do not have a diploma. The second largest group is resident over 65 and only 4.2% of them do not have a diploma. Those in the 25 to 34 years old and 35 to 44 years old are the most likely to have a college degree, 50.5% and 54%, respectively.

#### Educational Attainment – Median Earnings in the Past 12 Months

<b>Educational Attainment</b>	<b>Median Earnings in the Past 12 Months</b>
Less than high school graduate	\$30,438
High school graduate (includes equivalency)	\$40,101
Some college or Associate's degree	\$49,725
Bachelor's degree	\$66,641
Graduate or professional degree	\$84,417

**Table 41 – Median Earnings in the Past 12 Months**

Alternate Data Source Name:  
2015-2019 ACS

#### Median Earnings by Educational Attainment

As mentioned before, educational attainment and earnings are closely linked. In the Town, it appears to be particularly important to get a bachelor's degree. Residents with just some college or an associate degree have median earnings 23% greater than those with a high school graduate, but those with bachelor's degrees earn 66.2% more.

The annual wage difference based on education can lead to substantial wealth differences over time. A person who graduates high school and works from age 18 to 65 will earn approximately \$1,884,747. A person with a bachelor's degree who works from age 23 to 65 will earn \$2,798,922. That added financial benefit does not take into account that jobs that require a higher level of education tend to have benefits like health insurance and the higher income can lead to investments, purchasing a home instead of renting, and other activities that can increase wealth substantially.

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

According to the Business Activity table, the most prominent sector in Castle Rock is the Education and Health Care sector. This sector accounts for 39% of all jobs and 19% of all workers. The second largest sector is the Retail Trade sector with 12% of the jobs and 12% of the workers. In total, these two sectors account for over half of all jobs and approximately 31% of all workers.

#### Describe the workforce and infrastructure needs of the business community:

The Town of Castle Rock primarily has jobs that are either entry-level or high salaries. The local businesses face challenges in matching employees with positions, particularly mid-level positions. Additionally, the lack of multi-family housing units limits the availability of affordable units for the workforce and prevents



potential employees from moving to the area or staying. The lack of transit options has also been identified as a potential need for the business community in order to attract and retain talent.

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

The Town has a number of development initiatives planned in the Town but does not yet have a specific timeline. These initiatives include large amounts of commercial development for retail and office uses. These projects will increase job opportunities but the specific type of work depends on the tenants who move into the commercial spaces.

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

As noted above, there is a gap between the available workforce and what is needed. In particular, there is a gap in younger workers who have recently graduated college. There are also high paying jobs in Town, but the workforce does not have the required skills to fill them.

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

The Talent Pipeline DC is a partnership between the Castle Rock Chamber of Commerce and a number of public and private organizations, including educational facilities. The project works towards creating demand driven approaches to engage employers in the partnership to address workforce needs. Currently, there is a gap between what is happening in the educational facilities and what is expected when students graduate and enter the workforce.

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

No

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

The Castle Rock downtown area is undergoing significant redevelopment. One major project is Riverwalk, a mixed-use property that removed commercial facilities that no longer met the needs of the community. In its place retail options were developed, as well as 230 apartments at below market prices. Nearly one-quarter of the tenants work in the same area as the development.

DRAFT

## MA-50 Needs and Market Analysis Discussion

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

HUD identifies four specific data points that constitute "housing problems": cost burden, overcrowding, lack of complete plumbing facilities, and lack of complete kitchen facilities. Areas of concentration are census tracts that have two or more housing problems that are substantially higher than the Town average. For this analysis, "substantially higher" is based on the HUD provided standards set in the Needs Assessment. A tract with a housing problem rate of 10% higher than the Town average is considered substantially higher. To provide a more nuanced analysis, "cost burden" has been split into renter cost burden and homeowner cost burden.

#### Townwide Rate

- Overcrowding: 1.4%
- Lack of Complete Plumbing Facilities: 0.08%
- Lack of Complete Kitchen Facilities: 1.22%
- Renter Cost Burden: 48.55%
- Homeowner Cost Burden: 21.58%

#### Substantial Rate

- Overcrowding: 11.4%
  - No tracts that are substantially higher
- Lack of Complete Plumbing Facilities: 10.08%
  - No tracts that are substantially higher
- Lack of Complete Kitchen Facilities: 11.22%
  - No tracts that are substantially higher
- Renter Cost Burden: 58.55%
  - Tract 08035014012 – 59.4%
  - Tract 08035014403 – 63.4%
- Homeowner Cost Burden: 31.58%
  - Tract 08035014503 – 36.25%

There are no tracts in Castle Rock with a concentration of substantially higher rates of housing problems.

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

*Race/Ethnicity*

For the purposes of this analysis, a concentration is any census tract where the racial or ethnic minority group makes up 10% more than the Townwide average.

Countywide Rate

- American Indian or Alaska Native, non-Hispanic: 0.32%
- Black, non-Hispanic: 1.01%
- Asian, non-Hispanic: 1.82%
- Native Hawaiian or Other Pacific Islander, non-Hispanic: 0.11%
- Other Racial Group, non-Hispanic: 0.17%
- Multiracial, non-Hispanic: 2.4%
- Hispanic, all races: 10.32%

Concentration Rate

- American Indian or Alaska Native, non-Hispanic: 10.32%
  - No tracts with a racial concentration
- Black, non-Hispanic: 11.01%
  - No tracts with a racial concentration
- Asian, non-Hispanic: 11.82%
  - No tracts with a racial concentration
- Native Hawaiian or Other Pacific Islander, non-Hispanic: 10.11%
  - No tracts with a racial concentration
- Other Racial Group, non-Hispanic: 10.17%
  - No tracts with a racial concentration
- Multiracial, non-Hispanic: 12.4%
  - No tracts with a racial concentration
- Hispanic, all races: 20.32%
  - No tracts with an ethnic concentration

In Castle Rock, there are no tracts with a concentration of racial or ethnic groups

*Low-Income Families*

A family is considered low-income if it earns less than 80% of the area median income. A tract has a concentration of low-income families if the tract median household income is less than 80% of the Town median household income. The Town median family income is \$125,786 and relatively low-income is \$100,628. There is one tract with a concentration of low-income families. Tract 08035014504 has a median family income of \$86,411.

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

The tract with a concentration of lower income families is located in the downtown and eastern portion of the Town. The housing stock in this area tends to be older than elsewhere in the Town. The median home value and rent are also lower in this area.

**Are there any community assets in these areas/neighborhoods?**

The area contains a number of community assets, including museums, parks, the Douglas County Fairgrounds and religious facilities.

**Are there other strategic opportunities in any of these areas?**

This area is located near I-25 and includes a significant number of businesses. Additionally, the relatively low housing prices allow for a more efficient use of funds than if used elsewhere.

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

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

Internet is an essential communications and information platform that allows users to take advantage of the increased interconnectedness of business, education, commerce, and day to day utility. Reliable access to the internet is becoming a necessity to thrive in the modern economic environment. Communities that lack broadband access struggle to keep pace with the country. Locations without broadband access impedes its population's ability to take advantage of the educational and entrepreneurial opportunities available online. This is particularly problematic for LMI areas where economic opportunities are already lacking. Studies suggest a strong correlation between increased high-speed internet access and increased education and employment opportunities, especially in small cities and rural areas.

Technically, the Town of Castle Rock does not have significant gaps in broadband coverage. Most of the Town has multiple options of internet providers, to include LMI areas. The average Castle Rock household has four or more options for broadband-quality Internet service.

The following map shows broadband access throughout the Town. Broadband access is defined as advertised internet speeds of 768 kilobits per second or higher. Federal Communications Commission (FCC) data shows four major infrastructure options within Castle Rock: cable, DSL, Fiber, and Fixed Wireless.

**See map: Broadband Access**

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

Once broadband access has been obtained, it is important to ensure there is competition among service providers. Any resource that has a de facto monopoly on an area may not be incentivized to provide standard and consistent services. The Town has a total of 10 Internet providers offering residential service (Source: Broadband Now). Approximately 98% of Castle Rock residents are serviced by multiple wired providers.

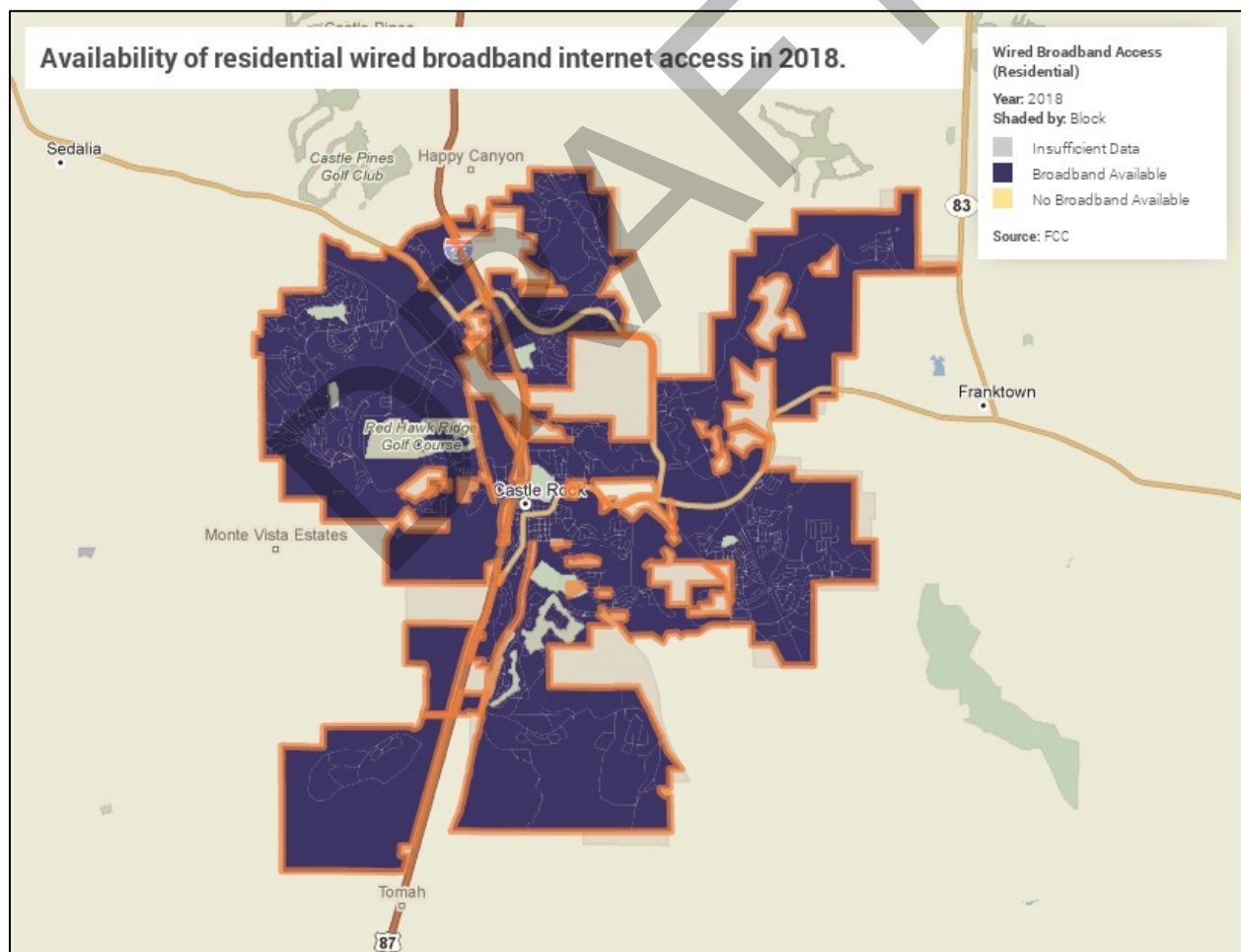
CenturyLink and Xfinity are the strongest providers in Castle Rock so far as coverage. The average household has four or more options for broadband-quality Internet service. These providers frequently overlap around Castle Rock:

CenturyLink (DSL and Fiber)

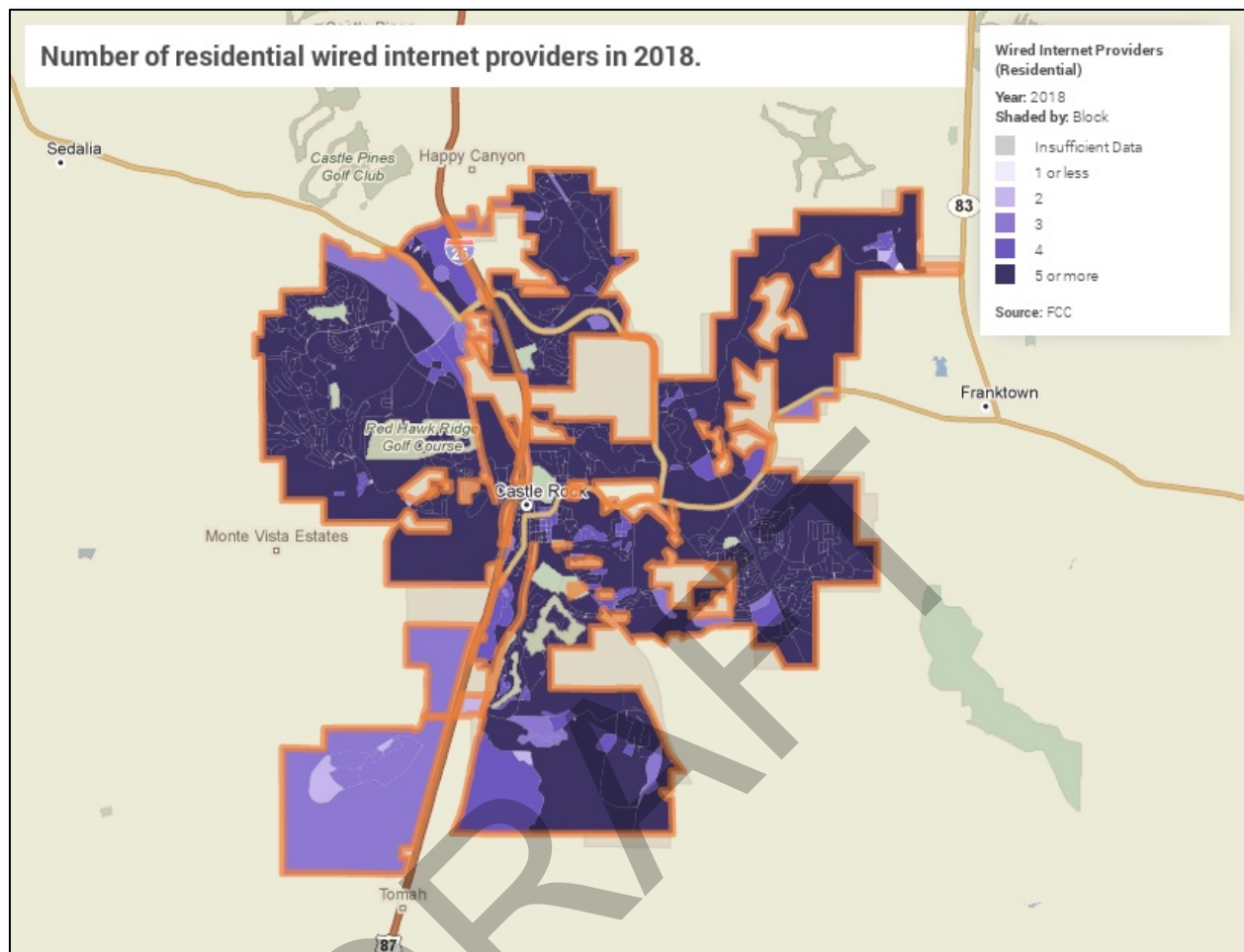
Xfinity (Cable)  
Rise Broadband (Fixed Wireless)  
Viasat Internet (formerly Exede) (Satellite)  
HughesNet (Satellite)  
Kellin Communications (Fixed Wireless)  
XtreamInternet (Fixed Wireless)  
Aerux Broadband (Fixed Wireless)  
Directlink (Fixed Wireless)

The map below shows the number of broadband service providers by census tract. Most of the Town has at least four options of high-speed internet with competitive providers, though there are some tracts with lower populations that have access to fewer providers such as the northwest and southwest corners of the Town.

**See map: High-speed Internet Providers**



## Broadband Access



## High-speed Internet Providers



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

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

The Town of Castle Rock refers to the Douglas County Office of Emergency Management in the case of emergency preparedness. The county has historically been prone to various natural hazard events. The Douglas County Local Hazard Mitigation Plan identified the following hazards as having a high likelihood of future occurrences: landslides, mud, debris flows, rockfalls, severe weather specific to extreme heat, hail, and high winds. Lightning, thunderstorms, heavy rains, winter weather, soil hazards, such as erosion, deposition and expansive soils, and wildfire also have a high likelihood of future occurrences. Of those, wildfires were the only highly likely hazard identified as high significance or potential to present a widespread impact. However, hazards that were identified as being highly likely occur once every year or up to once every five years, according to this assessment. The Town will need to continue their hazard mitigation strategies to prepare for, prevent and respond to these hazards.

The potential impacts of prolonged periods of excessively high temperatures, more heavy precipitation, more severe storms, or droughts are often most significant for vulnerable communities. According to the Intergovernmental Panel on Climate Change (IPCC), by the middle of the century, the average summer temperature is expected to rise four degrees. This rise in temperature could lead to altered weather and precipitation patterns, a rise in severe storms, an increased risk of catastrophic floods, increased electricity costs, and ruined crops. While the Town and county are inland, any increase in the ocean levels or increased storm activity may lead to people moving inland from the coastal areas of the country. Any future increase of people that could move into the area may drive up housing costs, reduce the availability of jobs, and tax resources.

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

Low- and moderate-income residents are at particular risk due to having less available resources to combat the impacts of natural disasters. A dramatic rise in electricity or housing costs could put them at imminent risk of homelessness or living in substandard conditions. Residents in rural communities will have less access to public support in case of emergencies and will have fewer resources to repair or prevent damage to their homes.

The Town of Castle Rock and the Douglas County Office of Emergency Management strives to inform and prepare the general public for multi-hazard mitigation. There are online venues (including the Castle Rock Emergency Preparedness webpage, the Douglas County website and social media pages, Douglas County Office of Emergency Management (OEM) website, CodeRED disaster and emergency alert system, Volunteer Connect and the Colorado Volunteers Active in Disaster (CO VOAD) website, and social media pages) that disseminate numerous informational guidebooks, videos, and alerts.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

The Strategic Plan outlines the Town of Castle Rock's overall planning and vision for community development over the next five years of the Consolidated Plan period. The goals outlined in the Strategic Plan are the Town's response to priority needs identified by its residents and local stakeholder organizations, and through the analysis and assessment of the Needs Assessment and Market Analysis.

The Strategic Plan specifically addresses how the Town intends to use CDBG funds toward furthering HUD's statutory goals of providing for suitable living environments and providing safe, decent and affordable housing especially for low- to moderate-income households and the special needs population in Castle Rock. The Strategic Plan also identifies target Low/Mod block group tracts that have a high percentage of low- to moderate-income household population to be assisted with projects and activities.

Below are the priority needs and associated goals identified in this Strategic Plan.

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

- 1A. Improve Access to Public Facilities (ADA)
- 1B. Improve Capacity of Public Infrastructure for LMI

#### **Priority Need: Supportive Services for LMI & Special Needs**

- 2A. Provide Supportive Services for Seniors
- 2B. Provide Supportive Services for LMI & Special Needs

## **SP-10 Geographic Priorities – 91.215 (a)(1)**

### **Geographic Area**

#### **General Allocation Priorities**

**Describe the basis for allocating investments geographically within the jurisdiction.**

Castle Rock does not allocate funding based solely on geographic requirements. When the planned activities are intended to serve individuals or households directly, those individuals or households must meet income qualifications, as well as residency requirements, in order 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 has identified infrastructure and public facility improvement activities. In which case, the planned activities will serve a community, neighborhood or “area.” These projects (or 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 groups tracts as those with 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 follow:

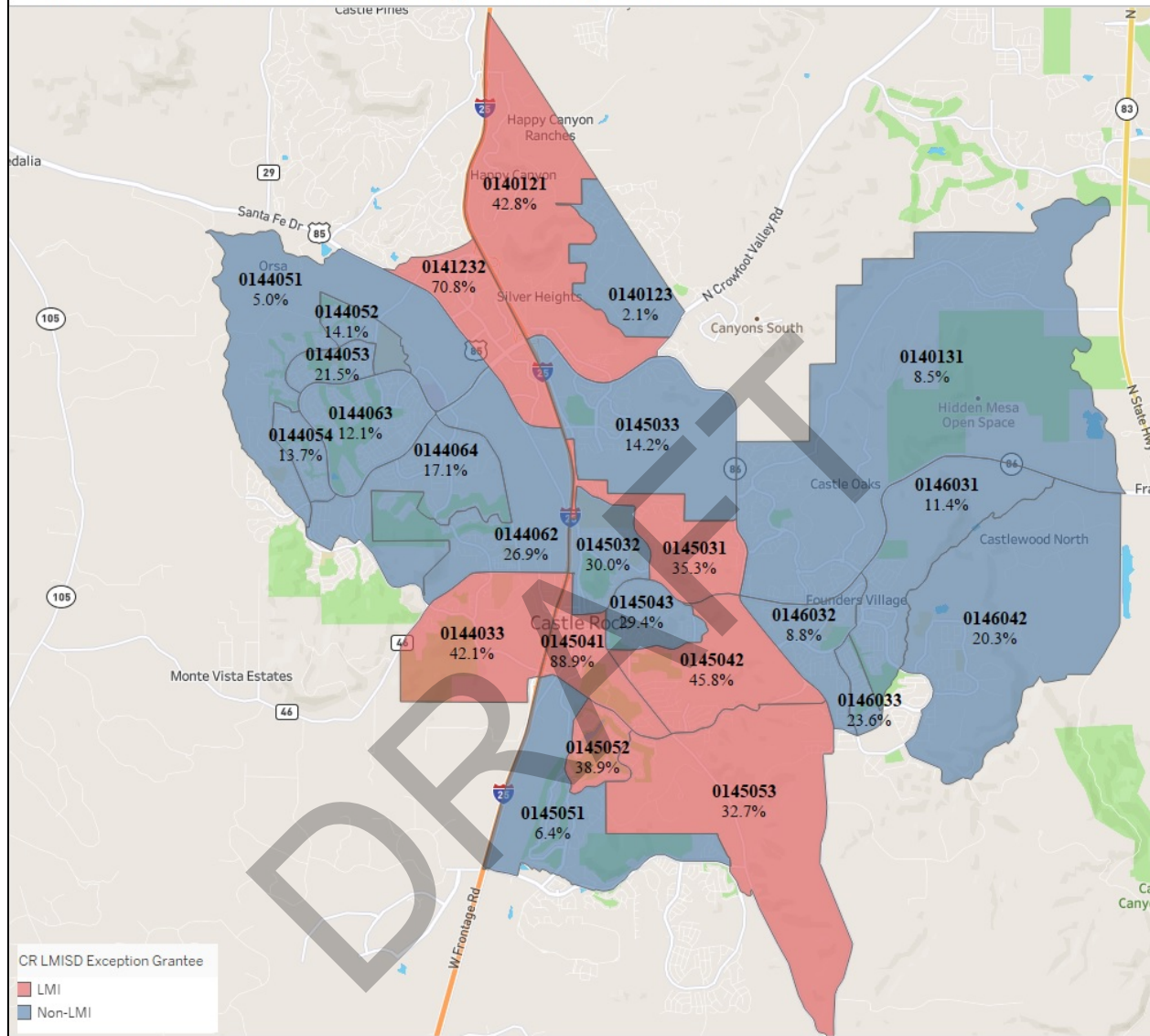
0140121, 0141232, 0144033, 0145031, 0145041, 0145042, 0145052, and 0145053

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 below:

## Castle Rock LMI Block Groups - Exception Grantee



**Low/Mod Census Block Group Tracts (Exception Grantee 32.73%)**

**Low/Mod Census Block Group Tract Details (2021)**

TRACT	BLKGRP	LOW/MOD	TRACT TOTAL	LOW/MOD %
014504	1	400	450	88.89%
014123	2	1,105	1,560	70.83%
014504	2	1,260	2,750	45.82%
014012	1	920	2,150	42.79%
014403	3	320	760	42.11%
014505	2	655	1,685	38.87%
014503	1	860	2,440	35.25%
014505	3	450	1,375	32.73%

Source: HUD CDBG Low/Mod Income Summary Data (LMISD)

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## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

Table 42 – Priority Needs Summary

1	<b>Priority Need Name</b>	Improvements to Public Facilities & Infrastructure
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	1A. Improve Access to Public Facilities (ADA) 1B. Improve Capacity of Public Infrastructure for LMI
	<b>Description</b>	There is a need to expand and improve public infrastructure in low- and moderate-income neighborhoods as well as improve ADA access to public facilities in the Town of Castle Rock. Improvements to infrastructure include streets, sidewalks, ADA improvements, and storm water and water systems in low- and moderate-income neighborhoods. ADA improvements for public facilities include neighborhood facilities, ADA parking lot improvements and parks and recreational facilities.
	<b>Basis for Relative Priority</b>	During the development of the 5-Year Consolidated Plan, community residents, local nonprofit stakeholders and Town staff identified the need for broad improvements to public infrastructure and in particular in low- and moderate-income areas. The Town also identified the need for ADA access improvements to public facilities.
2	<b>Priority Need Name</b>	Supportive Services for LMI and Special Needs
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Non-housing Community Development
	<b>Geographic Areas Affected</b>	

	<b>Associated Goals</b>	1B. Improve Capacity of Public Infrastructure for LMI 2B. Provide Supportive Services for LMI & Special Needs
	<b>Description</b>	There is a need to provide supportive services for LMI households and also the special needs populations in the jurisdiction. Public service activities will include services for the elderly, homeless, youth services and persons with a disability.
	<b>Basis for Relative Priority</b>	Through community participation and consultation of local stakeholder partners and organizations, the need for public supportive services for LMI and special needs groups, especially services for the elderly was identified. Public services will be offered by the Town and/or partner agencies to enhance the quality of life in the Town.

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## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	N/A. CDBG funds not will be used for Tenant Based Rental Assistance.
TBRA for Non-Homeless Special Needs	N/A. CDBG funds not will be used for Tenant Based Rental Assistance.
New Unit Production	N/A. CDBG funds will not be used for the development of new unit production of affordable housing.
Rehabilitation	N/A. CDBG funds will not be used for the rehab of residential housing
Acquisition, including preservation	N/A. CDBG funds will not be used for acquisition or preservation.

Table 43 – Influence of Market Conditions



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

### Introduction

Castle Rock is an entitlement community, eligible for federal Community Development Block Grant (CDBG) funding from HUD. The Town anticipates a CDBG allocation of \$230,932 for PY 2021 and an approximately similar amount for each year of the remainder of the 5-Year Consolidated Plan. Projects funded by CDBG must benefit low- and moderate-income residents and meet a priority, goal and objective identified in the Consolidated Plan.

### 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	230,932	0	0	230,932	923,728	Expected amount available for the remainder of the ConPlan is 4x more years of the annual allocation.

Table 44 - Anticipated Resources

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

As funds are limited, the Town of Castle Rock will seek to leverage additional resources with its federal CDBG funds. Currently, CDBG funding will leverage 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.

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

N/A

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## SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Town of Castle Rock	Government	Non-homeless special needs public facilities	Jurisdiction
Douglas County	Government	Non-homeless special needs Planning neighborhood improvements public facilities public services	Jurisdiction
Castle Rock Senior Center	Nonprofit organizations	Non-homeless special needs public services	Jurisdiction
Metro Denver Health Initiative	Continuum of Care	Homelessness Non-homeless special needs public services	Region
Castle Rock Parks and Recreation Department	Departments and agencies	Non-homeless special needs public services	Jurisdiction
Castle Rock Public Works Department	Departments and agencies	Non-homeless special needs public services	Jurisdiction
Castle Rock Water	Departments and agencies	Non-homeless special needs public services	Jurisdiction
Tri-County Health Department	Departments and agencies	Non-homeless special needs public services	Region

Table 45 - Institutional Delivery Structure

### Assess of Strengths and Gaps in the Institutional Delivery System

Castle Rock has a strong connection with area nonprofits, Town departments and other government agencies in serving LMI residents through public services – especially in regards to services for seniors living in the Town. Combined with Town programs for seniors such as recreation programs, Taxi Voucher program and Castle Rock Water Discount program, the Town also works closely with 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. Together, these services work to fill the needs of the elderly population in Castle Rock.

Unfortunately, with limited funds there are several gaps in service delivery. Currently, the Town is not able to provide affordable housing as the cost for housing is prohibitive with the amount of funds

available. While there are many notable public service programs serving LMI residents, the Town is not able to support all of them with direct funding.

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

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

**Table 46 - Homeless Prevention Services Summary**

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

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 to end homelessness in the area and the Town supports the CoC's homeless initiatives. The CoC covers the six county Denver metro area, which includes Douglas County. The CoC is responsible for coordinating with all six 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. The Homeless Management Information System (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.

CDBG funds will also 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. The Town works closely with the elderly population and provides many services that promote independent living such as the Tax Voucher program and the Castle Rock Water discount for seniors.

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

One of the strengths of the service delivery system for the special needs population is the Town's various programs that serve the elderly population. As mentioned earlier, the Town has a strong connection with area nonprofits and other government agencies in serving elderly residents. Combined with Town programs for seniors such as the recreation programs, Taxi Voucher program and Castle Rock Water discount program, the Town also works closely with 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. Together, these services work to fill the needs of the elderly population in Castle Rock.

The Town has access to the Douglas County Cares program, 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.

One of the gaps of service delivery for the homeless is that there are few local resources in Castle Rock. While the MDHI Continuum of Care network is widespread and reaches across the six county region to support initiatives to end homelessness, few of the resources are directed at Castle Rock. Further, the homeless population is difficult to identify.

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

The overall purpose of the Strategic Plan is to help fill the gaps in services for LMI and special needs groups and expand or improve facilities and infrastructure in Low/Mod areas. Unfortunately, CDBG funds cannot accomplish this alone. The Town will work with local organizations, especially those who work closely with Town initiatives, to increase their capacity and their ability to serve unmet needs. The Town will also work with Douglas County in the citizen participation process to help identify the community development needs and funding priorities within the Town. To address homeless needs, the Town will refer to MDHI.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	1A. Improve Access to Public Facilities (ADA)	2021	2025	Non-Housing Community Development		Improvements to Public Facilities & Infrastructure	CDBG: \$432,998	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 14925 Persons Assisted
2	1B. Improve Capacity of Public Infrastructure for LMI	2021	2025	Non-Housing Community Development		Improvements to Public Facilities & Infrastructure	CDBG: \$432,998	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 14925 Persons Assisted
3	2A. Provide Supportive Services for Seniors	2021	2025	Non-Housing Community Development		Supportive Services for LMI and Special Needs	CDBG: \$144,333	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted
4	2B. Provide Supportive Services for LMI & Special Needs	2021	2025	Non-Housing Community Development		Supportive Services for LMI and Special Needs	CDBG: \$144,333	Public service activities other than Low/Moderate Income Housing Benefit: 500 Persons Assisted

Table 47 – Goals Summary

## Goal Descriptions

1	<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 playground improvements, wheel chair access, ramps and signs.
2	<b>Goal Name</b>	1B. Improve Capacity of Public Infrastructure for 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.
3	<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).
4	<b>Goal Name</b>	2B. Provide Supportive Services for 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 residents include activities such as services for persons with a disability (05B), youth services (05D), vulnerable population groups (05F, 05G), job training (05H), emergency assistance (05Q) and health services (05M).

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

In the 5-Year Consolidated Planning period the Town of Castle Rock does not plan to directly fund affordable housing activities with CDBG funds; therefore, the Town has not estimated affordable housing outcomes in the table above. The Town anticipates that improvements to public infrastructure, such as streets and sidewalks, will help to draw housing investments to the Low/Mod areas.

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

The Town of Castle Rock falls within the service area of 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. While the DCHP helps LMI households in the area with a variety of affordable housing programs, there are no public housing developments.

### **Activities to Increase Resident Involvements**

N/A. There are no public housing developments.

### **Is the public housing agency designated as troubled under 24 CFR part 902?**

N/A. There are no public housing developments.

### **Plan to remove the ‘troubled’ designation**

N/A



## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

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. The Master Plan identified “Responsible Growth” as a key housing and residential investment related finding in Castle Rock. Responsible Growth is one of the four cornerstones that make up the building blocks of the Town’s vision along with a Distinct Town Identity, Community Services and a Thriving Economy. To effectively support this key focus area the Town created principles and strategies to guide future development of growth in Castle Rock.

**Responsible Growth (RG):** 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 residents. Castle Rock plans for responsible development that accommodates 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 are a list of guiding principles for responsible growth. Detailed implementation strategies are provided in the 2030 Master Plan.

RG Principles:

RG-1: Active participation in local and regional discussions surrounding growth and development.

RG-2: Annexation of areas with the potential to accommodate growth in a fiscally and environmentally sound manner.

RG-3: Cohesive neighborhoods, with a mix of land uses that offer a variety of lifestyle options for Castle Rock residents and meet the short- and long-term needs of the community while creating a place where people can live, work, and play.

RG-4: Orderly, cost-effective, equitable and fiscally responsible growth.

RG-5: Infill development that is sensitive to the scale and character of the surrounding neighborhoods.

RG-6: Promoting compatible downtown development.

RG-7: An integrated multimodal transportation system that allows for the safe and efficient movement of people and goods.

RG-8: Protection and conservation of natural resources, sensitive areas, ridgelines and areas of open space throughout the Town.

RG-9: Continue to secure a renewable water supply to serve the long-term needs of the community.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

The Town of Castle Rock will begin 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 where they may have a negative effect on certain aspects of the community, which in this case, are fair and affordable residential housing. Affordable housing and public and private residential investments are key components in furthering fair housing in any community.

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## **SP-60 Homelessness Strategy – 91.215(d)**

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

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 to end homelessness in the region and the Town supports the CoC's homeless initiatives. The CoC covers the six county Denver metro area, which includes Douglas County. The CoC is responsible for coordinating with all six 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.

### **Addressing the emergency 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 is difficult within the Town. For a picture of the homeless population, the 2020 PIT Count for the entire county was only 53 homeless persons.

**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 will refer 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.

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 poverty or conditions that may lead to homelessness. These services are mainly targeted for the elderly population and include the Taxi Voucher program and the Castle Rock Water discount for seniors.

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.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

See above. The Town will refer 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.

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 poverty or conditions that may lead to homelessness. These services are targeted for the elderly population and are the Taxi Voucher program and the Castle Rock Water discount for seniors.

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.

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## **SP-65 Lead based paint Hazards – 91.215(i)**

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

The Town does not work on affordable housing projects, and therefore does not address lead-based paint hazards. Castle Rock has a generally newer housing stock and therefore has a low percentage of housing units which have the potential for lead-based paint. The majority of the Town's housing 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. While the Town does not provide lead-based paint hazard services, it refers cases to the Tri-County Health Department if children are exposed.

As instructed by the Tri-County Health Department website, when a child has a confirmed blood lead levels greater than or equal to 5µg/dL, Tri-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) 435-3490 for more information.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

N/A. The Town does not work on affordable housing projects, and therefore does not address lead-based paint hazards. Please see above.

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

N/A. The Town does not work on affordable housing projects, and therefore does not address lead-based paint hazards. Please see above.

## **SP-70 Anti-Poverty Strategy – 91.215(j)**

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

The strategies outlined in the Town of Castle Rock's 2021-2025 Consolidated Plan's Strategic Plan are intended to serve as the Town's anti-poverty strategy by planning for expanded community development opportunities for low-to- moderate income and special needs persons. By improving the living conditions and providing access to vital services, the Town's LMI citizens may emerge from poverty.

### **How is the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan?**

Specific actions the Town will take are as follows:

1. Support vital public services such as health services; financial assistance programs such as the Taxi Voucher program and the Castle Rock Water discount for seniors; and sustainability programs that help the LMI and special needs population to improve their quality of life;
2. The Town will identify and work to expand and improve public infrastructure in LMI areas;
3. The Town will improve access to public facilities in LMI area, as well as provide for ADA improvements.

## **SP-80 Monitoring – 91.230**

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

The Town of Castle Rock CDBG program will be administered internally and will not utilize subrecipients to carry out the activities outlined in this plan.

The Town will monitor CDBG expenditures and IDIS cash disbursements. The Town will ensure 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 will track and review expenditures of activities and report 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.

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## Expected Resources

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

#### Introduction

Castle Rock is an entitlement community, eligible for federal Community Development Block Grant (CDBG) funding from HUD. The Town anticipates a CDBG allocation of \$230,932 for PY 2021 and an approximately similar amount for each year of the remainder of the 5-Year Consolidated Plan. Projects funded by CDBG must benefit low- and moderate-income residents and meet a priority, goal, and objective identified in the Consolidated Plan.

#### 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	230,932	0	0	230,932	923,728	Expected amount available for the remainder of the ConPlan is 4x more years of the annual allocation.

Table 48 - 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**

As funds are limited, the Town of Castle Rock will seek to leverage additional resources with its federal CDBG funds. Currently, CDBG funding will leverage 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.

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

N/A

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## 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: \$86,600	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2985 Persons Assisted
2	1B. Improve Capacity of Public Infrastructure for LMI	2021	2025	Non-Housing Community Development		Improvements to Public Facilities & Infrastructure	CDBG: \$86,600	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-Housing Community Development		Supportive Services for LMI and Special Needs	CDBG: \$28,867	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted
4	2B. Provide Supportive Services for LMI & Special Needs	2021	2025	Non-Housing Community Development		Supportive Services for LMI and Special Needs	CDBG: \$28,867	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted

**Table 49 – Goals Summary**

## Goal Descriptions

1	<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 wheel chair access, ramps and signs.
2	<b>Goal Name</b>	1B. Improve Capacity of Public Infrastructure for 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.
3	<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).
4	<b>Goal Name</b>	2B. Provide Supportive Services for 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 residents include activities such as services for persons with a disability (05B), youth services (05D), vulnerable population groups (05F, 05G), job training (05H), emergency assistance (05Q) and health services (05M).

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

In the table below are the proposed projects for the 2021 program year. The projects will address the two highest priority needs in the Town which are Improvements to Public Facilities & Infrastructure and Supportive Services for LMI and Special Needs. Administration of the CDBG program is capped at 20% of the CDBG 2021 funding allocation, as well as public services which has a grant cap of 15%. Details of the proposed projects are located in the following AP-38.

#### Projects

#	Project Name
1	CDBG: Program Administration (2021)
2	CDBG: Public Services (2021)
3	CDBG: Public Facilities & Infrastructure (2021)

Table 50 – 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 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

1	<b>Project Name</b>	CDBG: Program Administration (2021)
	<b>Target Area</b>	
	<b>Goals Supported</b>	1A. Improve Access to Public Facilities (ADA) 1B. Improve Capacity of Public Infrastructure for LMI 2A. Provide Supportive Services for Seniors 2B. Provide Supportive Services for LMI & Special Needs
	<b>Needs Addressed</b>	Improvements to Public Facilities & Infrastructure Supportive Services for LMI & Special Needs
	<b>Funding</b>	CDBG: \$46,186
	<b>Description</b>	Program administration of the CDBG program in PY 2021. Funding for admin will be no more than 20% of the grant allocation. Pre-award costs were utilized for the development of the CDBG program, and is included in the 20% admin cap.
	<b>Target Date</b>	9/30/2022
	<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).
2	<b>Project Name</b>	CDBG: Public Services (2021)
	<b>Target Area</b>	
	<b>Goals Supported</b>	2A. Provide Supportive Services for Seniors 2B. Provide Supportive Services for LMI & Special Needs
	<b>Needs Addressed</b>	Supportive Services for LMI & Special Needs
	<b>Funding</b>	CDBG: \$34,640
	<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 and recreation programs. Funding for public services is capped at 15% of the grant allocation.
	<b>Target Date</b>	9/30/2022

	<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: 200 Persons Assisted (TBD)
	<b>Location Description</b>	Town-wide
	<b>Planned Activities</b>	Planned activities for public services will include senior services, health and self-sufficiency assistance (05A).
<b>3</b>	<b>Project Name</b>	CDBG: Public Facilities & Infrastructure (2021)
	<b>Target Area</b>	
	<b>Goals Supported</b>	1A. Improve Access to Public Facilities (ADA) 1B. Improve Capacity of Public Infrastructure for LMI
	<b>Needs Addressed</b>	Improvements to Public Facilities & Infrastructure
	<b>Funding</b>	CDBG: \$150,106
	<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>	9/30/2022
	<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 activity is located)
	<b>Location Description</b>	Countywide
	<b>Planned Activities</b>	Planned activities for public facilities and infrastructure improvements will include ADA improvements to neighborhood facilities (03E), parks and recreation facilities (03F), ADA improvements to parking facilities (03G), and other infrastructure improvements (03Z).

## 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 meet income qualifications in order to receive direct assistance from activities and services in the CDBG program. For eligible activities to public facilities & infrastructure improvements, the Town will be targeting low- to moderate-income census block group tract areas in need. See below on how the Town will determine these areas.

### Geographic Distribution

Target Area	Percentage of Funds
N/A	N/A

Table 51 - Geographic Distribution

### Rationale for the priorities for allocating investments geographically

Castle Rock does not allocate funding based solely on geographic requirements. When the planned activities are intended to serve individuals or households directly, those individuals or households must meet income qualifications, as well as residency requirements, in order 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 has identified infrastructure and public facility improvement activities. In which case, the planned activities will serve a community, neighborhood or “area”. These projects (or 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 groups tracts as those with 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 follow:

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.

## 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 towards the priorities of public services and 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/Mod areas.

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

Table 52 - 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 53 - 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), 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. While the DCHP helps LMI households in the area with a variety of affordable housing programs, there are no public housing developments.

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

N/A. There are no public housing developments.

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

N/A. There are no public housing developments.

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

N/A. There are no public housing developments.

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## **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 to end 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.

**Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:**

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

The 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.

**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 is difficult within the Town. For a picture of the homeless population, the 2020 PIT Count for the entire county was 53 homeless persons.

**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 will refer 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.

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 poverty or conditions that may lead to homelessness. These services are targeted for the elderly population and are the Taxi Voucher program and the Castle Rock Water discount for seniors.

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.

**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**

See above. The Town will refer 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.

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 poverty or conditions that may lead to homelessness. These services are targeted for the elderly population and are the Taxi Voucher program and the Castle Rock Water discount for seniors.

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.

## **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. The Master Plan identified “Responsible Growth” as a key housing and residential investment related finding in Castle Rock. Responsible Growth is one of the four cornerstones that make up the building blocks of the Town’s vision along with a Distinct Town Identity, Community Services and a Thriving Economy. To effectively support this key focus area the Town created principles and strategies to guide future development of growth in Castle Rock.

**Responsible Growth (RG):** 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 residents. Castle Rock plans for responsible development that accommodates 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 are a list of guiding principles for responsible growth. Detailed implementation strategies are provided in the 2030 Master Plan.

#### **RG Principles:**

RG-1: Active participation in local and regional discussions surrounding growth and development.

RG-2: Annexation of areas with the potential to accommodate growth in a fiscally and environmentally sound manner.

RG-3: Cohesive neighborhoods, with a mix of land uses that offer a variety of lifestyle options for Castle Rock residents and meet the short- and long-term needs of the community while creating a place where people can live, work, and play.

RG-4: Orderly, cost-effective, equitable and fiscally responsible growth.

RG-5: Infill development that is sensitive to the scale and character of the surrounding neighborhoods.

RG-6: Promoting compatible downtown development.

RG-7: An integrated multimodal transportation system that allows for the safe and efficient movement of people and goods.

RG-8: Protection and conservation of natural resources, sensitive areas, ridgelines and areas of open space throughout the Town.

RG-9: 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 will begin 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 where 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.

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## **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 the priority needs in Castle Rock such as improvements to public facilities and infrastructure in LMI areas as well as 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 underserved needs in the community.

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

The activities identified in this plan will work to directly address the underserved needs of the LMI and special needs population. The Town will use CDBG funds to benefit elderly households in the community and provide services that directly work to prevent poverty or conditions that may lead to homelessness. Important services targeted for the elderly population are the Taxi Voucher program and the Castle Rock Water discount for seniors. CDBG funded programs will work to expand on these successful programs and the goal is to fill service gaps.

The Town will also work to address improvements and access to public facilities 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 into 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.

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

As funds are limited, the Town will not directly fund affordable housing projects with CDBG funding. The Town will target funds towards the priorities of public services and 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/Mod areas.

The Town of Castle Rock will begin 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 where 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. With the anticipation of receiving HUD federal CDBG grant funds, the Town will work to affirmatively further fair housing in the Town of Castle Rock.

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

The Town does not work on affordable housing projects, and therefore does not address lead-based paint hazards. Castle Rock has a low percentage of housing units which have the potential for lead-based paint. The majority of the Town's housing 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 Tri-County Health Department if children are exposed.

As instructed by the Tri-County Health Department website, when a child has a confirmed blood lead level greater than or equal to 5µg/dL, Tri-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) 435-3490 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 possible 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. These supportive services may include activities such as independent living services, health and self-sufficiency assistance. The goal is to help the elderly 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 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. Currently, the Town institutional deliver 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 Tri-County Health Department

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

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

See above. The Town will continually work 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. Currently, the Town institutional deliver 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 Tri-County Health Department

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

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## 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)

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

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

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income from 2021-2025. 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.	100.00%

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

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Signature of Authorized Official

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Date

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Title

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2021 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

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Signature of Authorized Official

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Date

---

Title

## Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

07/21/2021

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

### 8. APPLICANT INFORMATION:

\* a. Legal Name:

Town of Castle Rock

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

84-6000640

\* c. Organizational DUNS:

0883551020000

### d. Address:

\* Street1:

100 N. Wilcox St.

Street2:

\* City:

Castle Rock

County/Parish:

Douglas

\* State:

CO: Colorado

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

80104-2477

### e. Organizational Unit:

Department Name:

CDBG Program

Division Name:

### f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Mr.

\* First Name:

Matt

Middle Name:

\* Last Name:

Gohl

Suffix:

Title: Special Projects Manager

Organizational Affiliation:

Town of Castle Rock

\* Telephone Number:

(303) 660-1359

Fax Number:

\* Email: mgohl@crgov.com

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

CFDA Title:

### \* 12. Funding Opportunity Number:

14.218

\* Title:

Community Development Block Grant (CDBG)

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

The Town of Castle Rock's PY 2021-2025 Consolidated Plan & 2021 Annual Action Plan

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

4

\* b. Program/Project

4

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

10/01/2021

\* b. End Date:

09/30/2022

**18. Estimated Funding (\$):**

* a. Federal	230,932.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	230,932.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

Mr.

\* First Name:

David

Middle Name:

\* Last Name:

Corliss

Suffix:

\* Title:

Town Manager

\* Telephone Number:

303-660-1374

Fax Number:

\* Email:

dcorliss@crgov.com

\* Signature of Authorized Representative:

\* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**


**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.



11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

<b>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</b> 	<b>TITLE</b> <div data-bbox="899 1339 1511 1377">Town Manager</div>
<b>APPLICANT ORGANIZATION</b> <div data-bbox="94 1484 873 1518">Town of Castle Rock</div>	<b>DATE SUBMITTED</b> 