

CITY OF BOULDER 2023 CAPER DRAFT

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan.

91.520(a)

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

The City of Boulder receives both CDBG as an Entitlement Community and HOME funds as the lead agency for the Boulder Broomfield HOME Consortium (includes City of Boulder, City of Longmont, Boulder County and City and County of Broomfield). The City of Boulder uses its CDBG funds to further its housing and community development goals benefiting low income residents in the city. The primary objective of the Boulder Broomfield HOME Consortium is to maintain and increase housing opportunities through the creation and preservation of affordable housing, stabilization of low income households at-risk of homelessness and eviction, and supporting households and individuals experiencing homelessness. The outcomes of each Consortium member align with the approved 2020-24 Consolidated Plan and vary slightly depending on market area needs.

In 2023, the City of Boulder outcomes included the completion of several activities benefiting from CDBG funds from prior years, committed and planned investments in activities using the FY 2022 grant.

City of Boulder activities benefiting from prior CDBG grant years included the completion (full expenditure) of public service activities benefiting Family Resource Schools (IDIS 758), economic development activities through the Colorado Enterprise Funds Microenterprise Program (IDIS 755) and CDBG administrative funds (IDIS 745 and 753). Open activities include continued support of homeowner rehab activities through the Housing Rehab Program (IDIS 750). Activities that were awarded funding and are expected to commence in 2024 include capital improvement projects for Boulder Shelter for the Homeless (IDIS 760 and 761) and Thistle Community Housing (IDIS 762), as well as Community Investment Programs through the Section 108 Loan to support the construction of the Affordable Housing Modular Factory (742 and 759).

City of Longmont continued to focus on homeownership preservation and construction, as well as new homebuyer opportunities via downpayment assistance and financial counseling. The City of Longmont will also focus on housing stabilization programs, community investments, and economic development via job creation and support for micro-enterprises and small businesses with local initiatives.

City and County of Broomfield has successfully continued to use its HOME Funds to continue the Tenant Based Rental Assistance Program (TBRA) administered through the Health and Human Services Department.

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

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration	Administration	CDBG: \$ 842,800/ HOME: \$585,345	Other	Other	0	0		0	0	0.00%
Community Investment Programs	Non-Housing Community Development	CDBG: \$1,269,401 / HOME: \$150,000 / Section	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	45	2570	5,711.11%	0	0	0.00%
Community Investment Programs	Non-Housing Community Development	108: \$4,000,000	Other	Other	5	0	0.00%	4	0	0.00%
Economic Development Programs	Economic Development	CDBG: \$250,000	Facade treatment/business building rehabilitation	Business	0	0		0	0	
Economic Development Programs	Economic Development		Businesses assisted	Businesses Assisted	50	184	330.00%	10	50	500.00%
Homeownership Programs	Affordable Housing	CDBG: \$250,000 / HOME: \$2,000,000	Homeowner Housing Added	Household Housing Unit	50	31	24.00%	17	0	0.00%
Homeownership Programs	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	25	20	36.00%	10	11	110.00%
Housing Stabilization Programs	Affordable Housing Homeless	CDBG: \$850,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	0		0	0	
Housing Stabilization Programs	Affordable Housing Homeless		Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	531		200	148	74.00%
Housing Stabilization Programs	Affordable Housing Homeless		Other	Other	420	0	0.00%			

Rental Housing Programs	Affordable Housing	CDBG: \$750,000 / HOME: \$3,348,000/ CDBG-CV1: \$112,527 / CDBG-CV3: \$594,245	Rental units constructed	Household Housing Unit	0	21		60	0	0.00%
Rental Housing Programs	Affordable Housing		Rental units rehabilitated	Household Housing Unit	250	0	0.00%	10	0	0.00%
Rental Housing Programs	Affordable Housing		Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	23		10	3	30.00%
Rental Housing Programs	Affordable Housing		Housing for Homeless added	Household Housing Unit	0	7		3	5	166.67%

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

The City of Boulder successfully focused federal funds to meet the priorities and objectives in the Consolidated Plan and 2023 Action Plan. The City and its community partners believe the programs identified continue to be the best use of the HUD funds.

Community Investment

Flatirons Habitat CHDO Operating (751) – The City of Boulder invested CHDO HOME funds for operating expenses and capacity building costs. Eligible operating costs include salaries, wages, benefits, and other employee compensation; capacity building for the organization related to a specific future set-aside project to develop affordable housing or carry out the functions related to the organization; employee education, training and travel to perform job; office rent and utilities; communication costs; taxes and insurance.

Economic Development

Microenterprise (755) – The City of Boulder invested CDBG funds in 2023 to cover program costs for their microloan program in Boulder. This program included the creation of economic opportunities for low- to moderate-income people who own and operate small businesses in Boulder. Program services provided by Colorado Enterprise Fund (CEF) include business training, counseling and technical assistance, loan monitoring and servicing, and Boulder program marketing and outreach.

Homeownership Programs

Habitat Violet (734) – The City of Boulder invested HOME funds in 2023 towards the construction of Flatirons Habitat for Humanity’s Violet Ave project consisting of 19 total new construction homeownership units. Seven of these units are HOME designated units, with 3 previously secured, and this activity secures 4 additional HOME designated units at 2180 Violet Avenue. Completion is expected prior to February 2025.

Housing Rehab (750) – The City of Boulder invested CDBG funds in 2023 towards the Minor Home Repair program serving the City of Boulder, provided by the City of Longmont, to assist very-low, low- and moderate-income homeowners by offering the following programs: General Homeowner Rehabilitation Program, Emergency Grant Program, Mobile Home Repair Program, and Architectural Barrier Removal Program. In 2023, 11 households were served, while 10 households were expected.

Housing Stabilization

Family Resource Schools (758) – The City of Boulder invested CDBG funds in 2023 for staff salaries and specified operating costs supporting the Family Resource Schools Program delivery of educational support to five elementary schools within the Boulder Valley School District (BVSD). Eligible operating costs included payments to professional after-school teachers, educational materials, and transportation costs. 148 households benefitted from this activity in 2023, which was lower than expected, and may be explained by lower school enrollment.

Rental Housing Programs

BHP Hilltop (752) – The City of Boulder invested funds to support development efforts in the construction of a 60-unit permanently affordable multifamily, senior rental project, including some permanent supportive housing units, to be owned and operated by Boulder Housing Partners (BHP). Construction is on track for completion in 2024.

Broomfield TBRA (754) – The Consortium invested HOME funds in 2023 supporting the tenant based rental assistance program administered by the City and County of Broomfield. Less beneficiaries were supported with these efforts than anticipated due to low program enrollment. Broomfield has increased marketing efforts for the program.

Administration

The City of Boulder allocated HOME (739 and 748), HOME ARP (749) and CDBG (745 and 753) funds in 2023 towards respective general administration costs.

CR-10 - Racial and Ethnic composition of families assisted

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

91.520(a)

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

	CDBG	HOME
White	167	3
Black or African American	19	0
Asian	14	0
American Indian or American Native	2	0
Native Hawaiian or Other Pacific Islander	0	0
Total	202	3
Hispanic	108	2
Not Hispanic	106	1

Narrative

In addition to the households represented in the table above, there were 12 households assisted with CDBG that identified as Other/Multiple races with 3 of those households reporting as Hispanic. This information was added in the narrative portion since there is not a line item in the table for Other Multiple races.

Populations served by Boulder as shown in the table above include families and persons served and are representative of the population mix of the city. Current demographics for the population of the city of Boulder - White 84.25 % / Black 1.09% / Asian 5.98 % / American Indian or Alaska Native 0.25% / Native Hawaiian-Other Pacific Islander 0.06% / Some other race 1.85% / Two or more races 6.52 % / Not Hispanic 89.36% / Hispanic 10.64%.

The table below shows a more detailed breakdown of all accomplishments for HOME and CDBG and by each activity.

Source Data by Activity

IDIS	Activity Name (beneficiary type)	Totals	Race								AMI			
			White	Black/AA	Asian	AI/AN	NH/O-PI	Multirace	Hispanic	Non-Hispanic	Ext.Low + very low	Low	Mod.	Above 100%
758	FRS (persons)	148	110	16	10	2	0	10	101	47	137	7	3	1
750	Rehab (housing units)	11	10	0	1	0	0	0	2	9	11	0	0	0
755	Microenterprise (businesses)	50	43	2	3	0	0	2	5	45	22	4	9	15
744	BSH (housing units)	5	4	1	0	0	0	0	0	5	5	0	0	0
754	TBRA (households)	3	3	0	0	0	0	0	2	1	2	1	0	0
TOTALS:		217	170	19	14	2	0	12	110	107	177	12	12	16

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available.

Table 3 - Resources Made Available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	2,056,208.74	422,608.16
HOME	public - federal	4,377,336.00	682,003.19
Section 108	public - federal	4,000,000.00	0.00
Other (CDBG-CV)	public - federal	706,772.28	706,772.28
Other (HOME-ARP)	public - federal	4,256,840.00	3,594.21

Narrative

Note that the Other row includes CDBG-CV (\$706,772.28 available and expended) and HOME-ARP (\$4,256,840 available with \$3,594.21 expended).

In 2023, CDBG funds were expended to support housing rehab (\$77,089.82), public services (\$119,942.92), economic development (\$50,000), acquisition using CDBG-CV (\$706,772.28) and administration (\$175,575.42).

In 2023, HOME funds were expended to support rental housing and stabilization; TBRA (\$47,466) and BHP Hilltop (\$397,007.06), Habitat Violet (\$20,000) CHDO Operating (\$50,000), HOME Administration (\$167,530.13) and HOME ARP Administration (\$3,594.21).

In 2022, City of Boulder staff engaged HUD regarding the use of a Section 108 loan to support the construction of a modular affordable housing production facility. Conversations continued into 2023, with loan closing occurring in February, 2024. No funds were drawn from IDIS in 2023 using this source.

Identify the geographic distribution and location of investments.

Table 4 – Identify the geographic distribution and location of investments

Target Area	Planned Percentage of Allocation	Actual Percentage of Allocation	Narrative Description
Boulder/Broomfield HOME Consortium Region	100	100	HOME Region

Narrative

In 2015, the HOME Consortium members transitioned to employing a rotational distribution of funding, in which HOME awards funds are rotated throughout the region with each jurisdiction receiving the majority of the funds to pursue a project of magnitude. Each year, the actual awarding of funds are evaluated by the HOME Consortium members to ensure funds ultimately support an eligible project that best meets the housing needs of the Consortium area.

The purpose of this adjustment is threefold: 1) Concentrate HOME resources to simplify and expedite individual affordable housing projects; 2) Reduce the administrative burden of managing multiple HOME projects across the region; 3) Support the Ten-year Plan to Address Homelessness by supporting a regional approach to provide transitional and permanent housing to individuals experiencing homelessness.

All CDBG funding allocated to the City of Boulder is allocated to support activities within the city limits of Boulder. CDBG funds are prioritized to meet the housing needs of low and moderate income households, the capital improvement needs of service providers, and public services that target low- and moderate-income residents. The geographic location of the programs is dependent upon the request for funds, as the City's program is historically driven by an annual competitive application process.

Leveraging

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

The Match Liability requirement for 2023 was \$12,882.50 according to the PR33 report. The City of Boulder had expenditures as described below, using the city's affordable housing fund, a local funding source, for affordable housing projects.

The City of Boulder provided local affordable housing funds for acquisition and rehabilitation of affordable rental housing at BHP Tantra Lakes and for new construction of affordable rental housing at BHP Rally Flats in 2023.

Publicly owned land in 2023 included:

- Alpine Balsam – the City of Boulder purchased 1100 Balsam Ave in 2015 for the purpose of redeveloping the previous hospital into a new municipal campus, affordable housing, and some market rate housing lots. BHP will develop the affordable housing. Pre-development continued in 2023.
- 2691 30th Street – the City of Boulder acquired this property in 2022 and remains land banked.
- 2950 and 2960 Hawthorn Ave – land was dedicated to meet a market rate developer's inclusionary housing (IH) requirement. That land was designated to BHP in 2023 for the development of 73 units of affordable rental housing.
- 1655 33rd Street – land was dedicated to meet a market rate developer's IH requirement. That land was designated to BHP in 2023 for the development of affordable rental housing in the future pipeline.

Table 5 – Fiscal Year Summary - HOME Match Report

Fiscal Year Summary – HOME Match	
1. Excess match from prior Federal fiscal year	\$4,518,397
2. Match contributed during current Federal fiscal year	\$2,750,000
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$7,268,397
4. Match liability for current Federal fiscal year	\$12,883
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	\$7,255,514

Table 6 – Match Contribution for the Federal Fiscal Year

Match Contribution for the Federal Fiscal Year								
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/Real Property	Required Infrastructure	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
BHP Tantra Lakes	5/19/2023	2,750,000	0	0	0	0	0	2,750,000

HOME MBE/WBE report

Table 7 – Program Income

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	0	0	0	0

Table 8 – Minority Business and Women Business Enterprises

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Contracts						
Number						
Dollar Amount						
Sub-Contracts						
Number						
Dollar Amount						
	Total	Women Business Enterprises	Male			
Contracts						
Number	02	02				
Dollar Amount	\$19,012	\$19,012				

Sub-Contracts			
Number			
Dollar Amount			

Table 8 – Minority Owners of Rental Property

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted						
	Total	Minority Property Owners				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Dollar Amount	0	0	0	0	0	0

Table 9 – Relocation and Real Property Acquisition

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition		
Parcels Acquired	0	0
Businesses Displaced	0	0
Nonprofit Organizations Displaced	0	0
Households Temporarily Relocated, not Displaced	0	0

Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

CR-20 - Affordable Housing 91.520(b)

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

Table 10 – Number of Households

Number of households to be supported	One-Year Goal	Actual
Homeless	3	5
Non-Homeless	307	212
Special-Needs	0	0
Total	310	217

Table 11 – Number of Households Supported

Number of households supported through:	One-Year Goal	Actual
Rental Assistance	10	3
The Production of New Units	77	0
Rehab of Existing Units	10	11
Acquisition of Existing Units	3	5
Total	100	19

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

Number of households supported through Rental Assistance – Broomfield TBRA (754) was less than expected due to lack of applications for rental assistance with only 1 new application. Broomfield has and continues to do extensive outreach on Emergency Rental Assistance including advertising, in-person meetings with applicants, and informing partner agencies regarding the program. The TBRA program plans to expand access to eligible senior households in 2024.

Number of households supported through The Production of New Units – The goal was based on the BHP Hilltop (752) and Habitat Violet (734), which are multi-year new construction projects. Hilltop is anticipated to support beneficiaries in 2024, and Habitat Violet will support 4 beneficiaries in early 2025, and the remaining 12 households in future phases of construction.

Number of households supported through Rehab of Existing Units – The goal was 10 households supported through Housing Rehab (750). 11 households were supported.

Number of households supported through Acquisition of Existing Units – Two activities from Boulder Shelter for the Homeless Unit Acquisitions (743 & 744) supported this goal to provide permanent supportive housing (PSH) to those hardest to house exiting homelessness. The goal was to support 7 households by acquiring 7 units. 4 of these units were completed in 2022, with the remaining goal of 3 that carried over in 2023. With the closure of activity 744, 5 of the 7 units are now counted within this report.

Discuss how these outcomes will impact future annual action plans.

We are currently working on compiling the 2024 Action Plan. Goals for TBRA will be adjusted based on the increase for demand with outcomes being adjusted for expected beneficiaries for the plan year alone. This program is a multi-year endeavor.

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

Table 12 – Number of Households Served

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	175	2
Low-income	11	1
Moderate-income	12	0
Total	198	3

Narrative Information

In addition to the households represented in the table above, there were 16 households assisted above 100% AMI, including 15 businesses from Microenterprise activity 755 and 1 person from Family Resource Schools activity 758. This information was added in the narrative portion since there is not a line item in the table for Above 100% AMI.

The jpg table attached in CR-10 shows a more detailed breakdown of all accomplishments for HOME and CDBG and by each activity.

CDBG:

- **Family Resource School (758):** services families from income levels ranging from extremely low to the non-low moderate income levels. For FY 2023, there were 148 households served. Not included in the chart above is the income category for “Non-Low/Moderate”, whereby the program served 1 additional family bringing the total for all income levels served to 148.
- **Housing Rehab (750):** Minor Home Repair program serving the City of Boulder provided by the City of Longmont to assist very-low, low- and moderate-income owner-occupied homeowners by offering the following programs: General Homeowner Rehabilitation Program, Emergency Grant Program, Mobile Home Repair Program, and Architectural Barrier Removal Program.
- **Microenterprise (755):** provided micro-loans to small businesses in the City of Boulder.

HOME:

- **Broomfield Tenant-Based Rental Assistance Program (TBRA) (754):** is a two-year self-sufficiency program, providing rental assistance and supportive case management for low-income Broomfield households (inclusive of Broomfield City and County). The over-arching program goal is for families to be self-sufficient at the end of the two-year program. To meet eligibility, households must be homeless, living with family or friends, or have unsafe/unstable housing.

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

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

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

The City of Boulder participates and supports the countywide Coordinated Entry (CE) process which provides screening of people experiencing homelessness for sheltering, diversion, or housing-focused services, as appropriate. Progress made in homelessness outreach and assessment include:

- Providing space at a city-owned property for the provision of CE services
- Enhancement of the BTHRE outreach program including in-field CE screening
- Participation in countywide coordinated outreach programming.
- Improved coordination between municipal court homeless navigators, Police department, Parks, the Safe and Managed Public Spaces (SAMPS) team, nonprofits and housing staff to ensure adequate encampment outreach.
- Consultation with Boulder Police Department's in-depth analysis and survey of unhoused persons in encampments
- Conducting the city's first Summer Point in Time Count and Survey in July 2023
- Conducted community outreach to identify system gaps that could be met through a day services center.

Addressing the emergency shelter and transitional housing needs of homeless persons

Emergency Sheltering for adults in Boulder County is provided at Boulder Shelter for the Homeless (BSH - up to 160 beds; 180 in critical weather) and HOPE for Longmont (up to 48 beds). Sheltering is provided to victims of domestic violence through SPAN and Safehouse. Youth sheltering occurs at TGTHR.

Sheltering for women and transgender people is provided at The Lodge. Between 1/1/2023-12/31/2023:

- BSH provided 55,848 bed nights of service through program-based and standby beds and 3,656 bed nights of non-congregate sheltering.
- In lieu of a family (non-DV) shelter, families are bridged to housing programs through hotel vouchers.
- Inclement weather sheltering through BSH includes non-congregate sheltering for individuals between 11/15 and 3/31 and an expansion of 20 additional beds at the BSH facility on critical weather nights.
- Boulder Municipal Court continued a short-term transitional housing program for high justice-system utilizers to move seamlessly into PSH.

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

address housing, health, social services, employment, education, or youth needs.

Boulder County has significant prevention services and subsidies for housing stabilization.

- Boulder County Housing Authority's Housing Stabilization Program (HSP), funded by local tax revenue, administers funding to provide short-term rental and deposit assistance to community members experiencing homelessness or requiring temporary housing stability.
- For households transitioning from a Rapid Rehousing Program provides up to 50 Homeless Admission Vouchers for households meeting the McKinney-Vento Homeless Assistance Act definition, or a revised definition of "homeless" as defined by the HEARTH Act.
- The Family Unification Program (FUP), offers a supportive housing early intervention program providing housing and case management services to families with identified child welfare concerns and youth transitioning out of the foster care system.

Boulder complements this system by funding and providing a wide range of supports for extremely low-income individuals and families, to help them avoid homelessness. This support includes:

- Childcare subsidies for low-income families
- Eviction Prevention and Rental Assistance programming
- Keep Families Housed - School-based wrap-around support for families
- Community resource referrals and case management for older adults
- Resources, including mediation, for landlords, tenants, and roommates
- Enforcement of "Failure to Pay Wages" ordinance
- Rental assistance for tenants facing a potential eviction
- Funding of asset and income-building models such as Bridges Out of Poverty
- Access to physical, behavioral and mental health care
- Access to quality childcare and preschool for children in households with low-income
- Legal services to avoid eviction or other issues leading to homelessness
- Re-entry mentoring and resources.

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

City of Boulder accomplishments included:

- Increased funding for locally funded vouchers and associated case management.
- Obtained project-based vouchers for shelter acquisition units, allowing for more targeted support.
- Provided gap financing and support for PSH units as a percentage of all affordable housing development.
- Used CDBG-CV to fund the acquisition of 5 units to house individuals with lengthy criminal histories (who was otherwise unable to lease through traditional PSH voucher programs).
- Acquired properties to support a residential recovery home and a treatment center.

- Developed a High Utilizer task force to meet the unique needs of unhoused high utilizers of the criminal justice system. Created and implemented an MOU for data sharing and a revised Release of Information between jurisdictions, including criminal justice, hospital, governmental, and mental health entities.
- Provided rental assistance for Ready to Work program graduates.
- Fully implemented the Building Home Program – peer support programming and a dedicated Housing Retention Team designed to build community, reduce isolation, and assist people with maintaining PSH units.
- Worked toward opening in Q2 2024 – Day Service Center (housing focused navigation center) and respite services within Boulder Shelter for the Homeless.

Boulder County HHS continue to provide the following programs to help formerly homeless individuals and families transition from homelessness into permanent housing:

- Financial literacy classes;
- Public benefits screening, eligibility and enrollment – Families and individuals are screened for eligibility and enrolled in public benefits via PEAK (online benefits enrolment);
- Follow-up is provided by case worker to ensure families receive benefits (i.e. food assistance, Medicaid, Child Health Plus, cash assistance, etc.);
- Childcare Assistance Program enrollment;
- Access to domestic violence advocacy, counseling and support; and
- Access to Family Resource Centers (FRC), substance abuse and mental health services.

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

Actions taken to address the needs of public housing.

As a part of the 2020-2024 Plan, the HOME Consortium partners performed a Human Services Needs Assessment to pinpoint specific gaps in service provision to help prioritize and efficiently allocate resources, including public housing.

Additionally, the City of Boulder will continue to support preservation and development initiatives pursued by Boulder Housing Partnership (BHP).

BHP Public Housing Example and Property Updates:

- **Arapahoe Court** - In 2023, BHP continued to pursue voluntary conversion of Arapahoe Court from Public Housing in order to close out the agency's Public Housing program. The property is in a high hazard flood zone and is not suitable for continued housing. The voluntary conversion of Arapahoe Court is anticipated to complete in 2024 pending HUD approval.

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

As a part of the Consolidated Plan, the City of Boulder along with other members of the Regional Consortium developed and now maintains a Citizen Participation Plan. Citizen Participation is an integral part of the overall planning, evaluation, assessment and implementation process of the Boulder/Broomfield Regional Consortium's Community Development Block Grant and HOME Investment Partnerships Programs, and any other grant program that is included in the Consolidated Plan submission, together referred to as the Community Planning and Development or CPD Programs. The purpose of this Citizen Participation Plan is to provide all Boulder and Broomfield community members with the information and mechanisms to allow them to fully participate at all levels of the Consortium's CPD Programs. The Consortium recognizes the importance of citizen participation and fully endorses a philosophy that maximizes community member involvement in housing and community development activities.

The City of Boulder continues to successfully implement its Permanently Affordable Homeownership program, which provides opportunities for low income households to purchase homes at below market rate prices, and down payment assistance programs, including the Solution Grant: Down Payment Assistance Program, H2O: House to Homeownership: Down Payment Assistance Loan Program, and the new Middle Income Down Payment Pilot Program.

Boulder Housing Partners, the City of Boulder's housing authority, provides Resident Services staff dedicated to preserving or enhancing independence and quality of life for BHP residents. They support residents to build strong communities and to find creative solutions to personal or community problems and issues. Their staff is available to advocate for individual residents and families, to connect them to community resources, including homeownership opportunities and to bring programs to their housing sites.

The City of Boulder also provides local funding to the Boulder County Personal Finance Program which provides housing and financial counseling and community education services to low and moderate

income persons, including homeownership and financial assessments, goal setting, money management, budgeting, reducing debts, credit repair and savings.

Actions taken to provide assistance to troubled PHAs.

There were no troubled PHA's in 2023, therefore no action was taken.

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

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

The local jurisdictions, BCHA and BHP continued to advocate for the removal of public policies that serve as barriers to affordable housing. This includes regional planning and cooperation to help identify County-wide solutions to negative public policies such as advocating for expedited planning reviews of affordable housing and fee waivers for projects that include affordable housing (91.215(l)).

Since the development of the last Plan, conducted in 2020-2024, the Consortium has strengthened its coordination and cooperation through the Boulder County Regional Housing Partnership and created a strategic plan titled *Expanding Access to Diverse Housing for our Community*. This plan includes a housing market analysis, strategy, and identifies clear regional housing goals. The Regional Housing strategy, adopted by all the Boulder County jurisdictions and Boulder County, set forth a goal of increasing the number of affordable homes countywide to reach 12 percent of its housing stock by 2035. During this time period Broomfield also completed a housing market analysis and strategy.

Several jurisdictions in the county, Erie, Superior, and Louisville, continued with the adoption of the inclusionary housing ordinances requiring residential development contribute the creation of affordable housing through unit production or cash-in-lieu payments.

During 2023, the City of Boulder continued with efforts to consolidate affordable housing compliance for both rental and homeownership with the goal of increasing efficiency and remove barriers to accessing affordable housing countywide. An intergovernmental agreement is currently under consideration by the county, Erie, Lafayette, and Louisville to formalize the structure and funding will be supported through county ARPA sources.

In 2023, the City of Boulder also adopted regulatory changes to allow more affordable housing by increasing occupancy limits, removing barriers to the creation of Accessory Dwelling Units, revising density calculations, reducing parking requirements, and increasing the variety of housing types in more zoning districts.

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

The Consortium member jurisdictions continue to partner with the State in the coordination of funding opportunities ensuring the leveraging of state, local and private investment funding to support housing

and community development efforts. All Consortium members participate in the Metro Denver Homeless Initiative (MDHI), which facilitates, integrates, and tracks cooperative, community-wide and regional systems of care for people who have become homeless, to help them become stable, and work toward self-sufficiency.

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

The City of Boulder has partnered with the City of Longmont to administer a Housing Rehab Program, that has an objective to evaluate and reduce lead-based paint hazards in low-income homes in the City of Boulder and the City of Longmont.

Also, City compliance staff conduct Lead Based Paint Visual Assessments on properties built prior to 1978. The City also requires owners and managers of permanently affordable rental housing built before 1978 to abide by HUD's Guidelines for the Evaluation and Control of Lead-Based Paint Hazards.

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

The Consortium is committed to reducing the number of households with income below the poverty level (roughly \$25,000 for a household of four) by providing them with programs to motivate and assist them to move toward self-sufficiency. Jurisdictions work with various service providers and other units of local government to provide supportive services to residents with low income. As housing is one of the most critical issues for these households, the Consortium will continue to provide and seek additional resources to preserve and create housing opportunities.

The City of Boulder will continue to focus its efforts and resources to reduce the number of poverty-level families through the preservation and creation of safe and affordable housing. The foundational importance of meeting the housing needs of poverty-level families will support them in moving toward self-sufficiency. Continued and expanded coordination with the City's Human Service Fund provides the opportunity to support the agencies serving poverty-level families. Expanded coordination with the City's Economic Vitality Program will provide opportunities for poverty-level families to gain the training and skill-building, resources and supports that can lead them to achieving self-sufficiency.

Boulder's Community Mediation Services program also provides mediation, restorative justice and meeting facilitation services for all city residents, including neutral information regarding landlord-tenant matters. In conjunction with Longmont's Mediation Services program, these services have been expanded to cover the entirety of Boulder County, with the goal of preventing or minimizing evictions.

In 2023 the City of Boulder continued implementation of the community initiated and voter approved Eviction Prevention and Rental Assistance Program; a city ordinance which levees a rental licensing tax to fund legal services and provide rental assistance to persons at risk of eviction. Each year, the City of Boulder also administers the Food Tax Rebate Program to help compensate residents with lower incomes for the city sales tax they pay on food. Those seeking a rebate must fill out an application documenting their eligibility. In 2023, rebates were \$99 for individuals and \$302 for families. City residents who do not have permanent shelter are eligible for the refund and can meet the residency requirement by providing documentation that they are receiving services from a city recognized homelessness services agency.

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

Research indicates stakeholders believe that the region has the right institutional structure in place to provide needed services. The greatest challenge in the region is limited funding to serve the growing number of residents who need services.

The City of Boulder Department of Housing and Human Services will continue to administer the CDBG program. Activity selection and funding decisions will continue to be made in close coordination with the City's Human Services and Health Equity funds and the Community Vitality program. These decisions will continue to be influenced by the expertise of two Advisory Committees, appointed by the City Manager. The City will also continue its regular coordination meetings with housing and service providers.

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

The City of Boulder has developed collaborative relationships throughout the region to enhance coordination of services and fill service gaps in the Consortium area. In the development process of the 2020-2024 Plan, more than 100 agencies were invited to contribute to the Plan by attending community meetings and open houses, participating in focus groups, responding to the 2020 resident survey, and helping to promote the survey to households with low and moderate income in the region. No agencies were expressly not consulted.

Notable collaborations include:

- **Boulder County Funders Collaborative** – Investment program staff from county and municipal governments, and staff from local community foundations collaborate to identify and respond to fund human service needs through nonprofit partner agencies. City of Boulder staff facilitate the Collaborative, its specific purpose is to enhance coordination and work to eliminate gaps in services while avoiding duplication of services.
- **Homeless Solutions for Boulder County** – This collaborative (City of Boulder, City of Longmont, Boulder County, local housing authorities) meets regularly to determine housing and service needs for single adults experiencing homelessness.
- **Boulder County Regional Housing Partnership:** All 11 Boulder jurisdictions have passed resolutions to support the work of the Regional Housing Partnership and continue to work towards the 12% permanently affordable housing goal – secure 12% of all residential properties in the county as permanently affordable by 2035. Collective work focuses on creating and preserving housing opportunities, implementing programmatic and regulatory efficiencies and alignment, and increasing financial resources. On January 29, 2024, the partnership hosted an Affordable Housing Summit for all the elected officials and staff to evaluate the current status of the plan and identify next steps. For example, Boulder County voters approved a ballot measure to fund affordable housing that will raise an additional \$18-20 million a year.
- **Boulder Broomfield Regional Consortium** – Works to identify and address common housing needs, overcome gaps in affordable housing provision and increase the amount of HOME funding coming to our local region.

The City of Boulder works closely and effectively with Boulder Housing Partners and nonprofit housing providers to help meet the affordable housing needs of residents.

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

As a part of the development of the 2020-2024 Plan, a regional Analysis of Impediments to Fair Housing Choice (AI) was utilized as a data source. According to the AI, which analyzed data from area public housing authorities, housing authority clients largely have extremely low incomes. Many are older adults and are unlikely candidates for ownership housing. For those interested in ownership, the most effective programs are likely land trusts and/or stabilizing ownership within mobile home park communities.

- Residents living in BCHA properties have predominately extremely low- to very low-income—63 percent make an income of 30 percent AMI or less and 17 percent make an income of 31 to 40 percent AMI.
- Residents living in BHP properties have income ranging from extremely low to moderate income, with slightly more residents making between 50 percent AMI or more. Twenty-one percent of BHP residents live with a disability and these residents are mainly older adults.
- Longmont Housing Authority clients are slightly higher income with the majority of residents making between 31 and 59 percent AMI. Twenty-eight percent have a disability.

The City of Boulder approaches funding priorities and strategic goals with equity framework. All housing authorities connect clients expressing an interest in ownership to area nonprofits specializing in homeownership and self-sufficiency.

CR-40 - Monitoring 91.220 and 91.230

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

Monitoring is an ongoing process of reviewing the City's program performance and the performance of fund recipients. It involves using all available data in making judgments about appropriate funding and performance. City of Boulder compliance staff conduct an Annual Risk Assessment and monitoring reviews of federally funded activities and CHDO's. Monitoring is conducted according to the CDBG and HOME program requirements which include an annual risk assessment of rental housing properties to determine a property's risk of non-compliance. The results of the risk assessment determine the monitoring schedule and frequency. At minimum, all rental housing properties are monitored every three years. Typically, additional monitoring is conducted if findings in the initial monitoring deem it necessary.

On-going monitoring of federally funded projects are conducted by compliance staff in the Department of Housing and Human Services, through review of quarterly progress reports, annual tenant audit and beneficiary reports, reimbursement requests, financials and single audits. Analysis of recipient records and activities may indicate a need for special monitoring visits by City staff to resolve or prevent further problems.

In 2023 a total of 41 projects were monitored which included 9 HOME-assisted properties and 6 CDBG projects. There were two (2) projects monitored which resulted in corrective action and four (4) projects that resulted in findings, each regarding lease provisions. All corrective action were resolved within the time required. In addition to monitoring projects/properties, a total of 37 units were inspected to ensure affordable units remain descent, safe and sanitary.

Monitoring reports, according to standard process, reflect the dates of the monitoring visits, areas monitored, the findings and concerns (if applicable), when they are resolved (if applicable), as well as areas still to be monitored. All reports are located in the respective files.

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

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

In the interest of enhancing citizen participation, the City of Boulder, Boulder County, and the Boulder Broomfield Regional Consortium requested comments on the 2023 CAPER. A 30-day public comment period began Wednesday, January 31, 2024. All residents were notified via our city newsletter, the local newspaper, and the city website. Residents were encouraged to submit written comments or questions by 5:00 pm, on Sunday, March 4, 2024. A public hearing was held on Monday, March 4, 2024 at 11:00 a.m. at 1101 Arapahoe Ave., Boulder, CO, 80302. No comments received.

CR-45 - CDBG 91.520(c)

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

Progress continues on the Modular Production Facility into 2024. The property has been annexed into Boulder city limits. The Section 108 Loan closing occurred in February 2024. No funds were expended using this source during 2023. The City of Boulder did not meet the 2023 CDBG timeliness test due to the delay in the Section 108 loan. At the point in which it became clear that the loan would not process in time for timeliness to be met, an additional fund round with request for applications was launched, resulting in 5 new activities being awarded funding. The expenditure of this funding will occur in 2024, thus timeliness in 2024 is not anticipated to be an issue.

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

The city of Boulder does not have any open Brownfields Economic Development Initiative grants.

[BEDI grantees] Describe accomplishments and program outcomes during the last year.

The city of Boulder does not have any open Brownfields Economic Development Initiative grants.

CR-50 - HOME 24 CFR 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

A total of 37 units were inspected at the following properties.

- Boulder Shelter Permanently Supportive Housing
- Bustop
- Correll
- Laguna
- Parkside
- Pinewood
- Sage Court
- Spruce St
- Uptown Broadway
- Valmont Square

All of the properties referenced above were inspected. No issues or deficiencies were identified during inspection. All properties that required inspection were inspected. No remedy required.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

The City of Boulder actively promotes fair housing through ongoing funding of fair housing services; adoption and implementation of an "Analysis of Impediments to Fair Housing Choice"; adoption of a Consolidated Plan for CDBG/HOME programs, with an analysis and strategy for fair housing every five years, and in the Annual Action Plan; annual monitoring of fair housing activities through monitoring of fair housing services and reporting on ongoing activities in its Consolidated Annual Performance and Evaluation Report (CAPER).

The City of Boulder, Department of Housing and Human Services is responsible for the implementation of the Affirmative Marketing Plan and all owners, developers, Community Housing Development Organizations and other non-profits must comply with this policy for all CDBG, HOME and City funded housing developments. The City uses the following methods to inform the public, potential tenants, potential homeowners, potential and existing for-profit developers, potential and existing non-profit developers, and local units of government about Federal Fair Housing laws and Affirmative Fair Housing Marketing Plan and Procedures.

1. The City staff is responsible for implementing the Marketing Plan and evaluating its effectiveness as required by the CDBG/HOME Program.
2. The City informs the community about its Affirmative Marketing Policy through periodic updates at public forums and Fair Housing meetings, as well as training workshops with its CDBG/HOME grantees or other similar forums. The City's Affirmative Marketing Policy is published on the City's website which is included in the Rental Compliance Manual.
3. The City provides fair housing information/referrals, case investigation services, tenant/landlord information/referrals and mediation services.
4. The City collaborates with the office of Human Rights to reduce discrimination in housing.
5. The City refers tenants and rental property owners to the Community Mediation and Resolution Center (<https://bouldercolorado.gov/community-relations/mediation-program>) regarding tenant and landlord rights and responsibilities.
6. The City provides information about fair housing, fair housing service providers, fair housing brochures and a copy of the City Affirmative Marketing Plan is available on the City Department of Housing and Human Services, Investment & Compliance website <https://bouldercolorado.gov/services/investment-and-grant-compliance>
7. The City continues to provide general information and telephone reference numbers to persons contacting the City of Boulder, Department of Housing and Human Services with questions regarding Affirmative Marketing and Federal Fair Housing laws.
8. The City requires that Grantees of CDBG and/or HOME funded rental/homebuyer housing provide an annual report describing how their actions have complied with the City Affirmative Marketing Plan.
9. The City periodically posts flyers and brochures which describe fair housing laws and services in open public areas.
10. Grantees of CDBG/HOME funds instruct all employees and agents on the policy of nondiscrimination of fair housing both in writing and orally.

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics.

CDBG Program Income (PI) received during 2023 included five loan repayments from the Housing Rehab program. As required by HUD, PI must be expended first.

Loan repayments received:

- \$15,044.96 Housing Rehab Loan repayment
- \$20,505.00 Housing Rehab Loan repayment
- \$582.00 Housing Rehab Loan repayment
- \$9,202.50 Housing Rehab Loan repayment
- \$16,792.00 Housing Rehab Loan repayment

In 2023, \$36,131.96 was used towards housing rehab (IDIS 750) for program expenses. \$25,994.50 was used towards FRS (IDIS 758) for program expenses. Net drawn amount for program year 2023 totaled \$62,126.46 as shown in PR01 and allocated as per above.

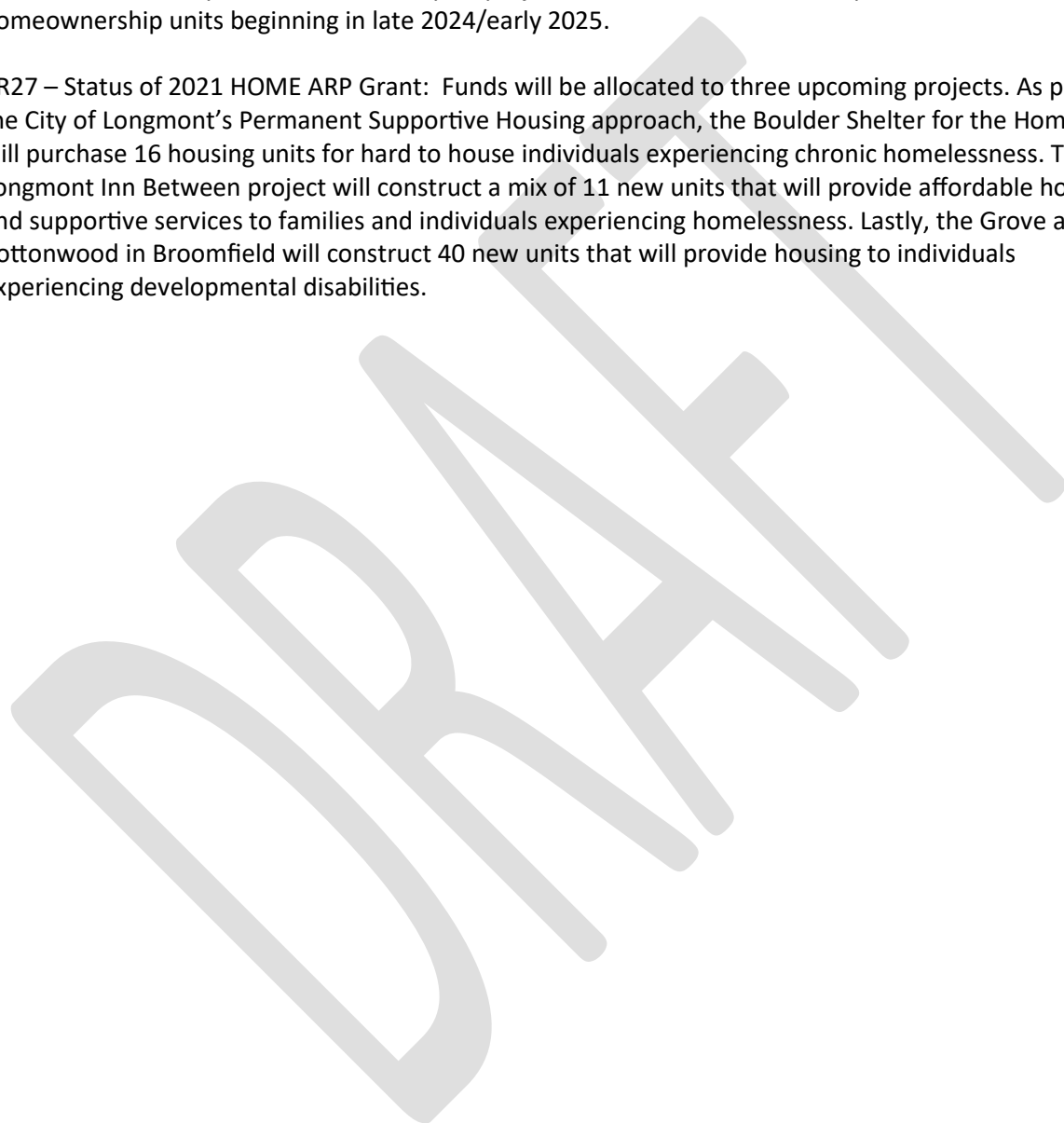
Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable

housing). 24 CFR 91.320(j)

Consortium members have addressed gaps identified in the Needs Assessment over the past five years through housing development, using federal and state Low-Income Housing Tax Credit (LIHTC) dollars and gap funding from local funds, HOME, and CDBG.

PR27 – Status of 2023 HOME Grant: 2023 CHDO Reserve is anticipated to be allocated to St. Vrain Habitat for Humanity for their Sunset Duplex project, which will construct 2 duplexes for a total of 4 homeownership units beginning in late 2024/early 2025.

PR27 – Status of 2021 HOME ARP Grant: Funds will be allocated to three upcoming projects. As part of the City of Longmont’s Permanent Supportive Housing approach, the Boulder Shelter for the Homeless will purchase 16 housing units for hard to house individuals experiencing chronic homelessness. The Longmont Inn Between project will construct a mix of 11 new units that will provide affordable housing and supportive services to families and individuals experiencing homelessness. Lastly, the Grove at Cottonwood in Broomfield will construct 40 new units that will provide housing to individuals experiencing developmental disabilities.



CR-58 – Section 3

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

Table 13 – Total Labor Hours

Total Labor Hours	CDBG	HOME	ESG	HOPWA	HTF
Total Number of Activities	0	0	0	0	0
Total Labor Hours	0	0			
Total Section 3 Worker Hours	0	0			
Total Targeted Section 3 Worker Hours	0	0			

Table 14 – Qualitative Efforts - Number of Activities by Program

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

Narrative

The City of Boulder incorporates language in our requests for bids to invite Section 3 Business Concerns to bid on all federally funded projects. Some initiatives that the City will continue to focus on will be:

- Updating the Policies & Procedures for Section 3
- The City's new Housing Project Manager has completed training on the new Section 3 rules and will continue to stay up to date with all updates provided by HUD. The Housing Project Manager will serve as the Section 3 Coordinator for HHS.
- The City will continue outreach efforts and engage housing authorities and housing providers to provide training and employment opportunities to Section 3 residents. We will provide them with the tools to identify those residents in need of training and/or interested in participating with the Section 3 employment opportunities.
- Staff meets one-on-one with contractors and sub-contractors to provide technical assistance on Section 3 regulations, educate contractors on Section 3 resident employment and training opportunities as well as the city's Section 3 goals.