

Executive Summary

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

1. Introduction

This is the 2023 Action Plan representing the fourth year of the Boulder Broomfield Regional Consortium's Consolidated Plan ("Con Plan") for the fiscal years 2020-2024 as approved by HUD. In addition to satisfying the planning and reporting requirements for the Boulder Broomfield Regional HOME Consortium, components of this plan detail how the City of Boulder proposes to allocate their entitlement Community Development Block Grant (CDBG) funds to housing and community development needs.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The primary objective of this Action Plan is to maintain and work toward increasing housing opportunities and addressing community development needs in the Consortium area. The outcomes of each Consortium member jurisdiction vary slightly depending on market area needs. Specifically, the City of Boulder's outcomes focus mostly on preserving and creating affordable rental housing, public services and capital improvements of community serving agencies. The city intends to continue supporting owner-occupied housing rehabilitation, homeownership opportunities, and to provide supportive services for people who are experiencing homelessness and other special needs populations with supportive services.

The city will continue to allocate CDBG funds to support households in the Family Resource Schools program at five select area elementary schools and the operations of Colorado Enterprise Fund (CEF) providing microloans to low-to-moderate income small business owners with priority to Minority-Owned Business Enterprises and Women-Owned Business Enterprises (MBE/WBE), and Housing Rehabilitation serving low-to-moderate income homeowners with general homeowner rehab program, emergency grant program, mobile home repair program and architectural barrier removal program in Boulder. Primary expenditures for 2023 include repayment of the Section 108 Loan and construction of properties which were funded in the previous year.

In 2023, the Consortium proposes to allocate HOME funds as per the below chart.

**City of Boulder 2023
Funding Allocation Table**

Boulder/Broomfield Consortium 2023 HOME Funding Allocation						
	Boulder	Longmont	Boulder County	Broomfield	2023 Anticipated Expenditures	Future Years Anticipated Expenditures
Administration	\$ 127,991				\$ 127,991	\$ -
2022 HOME Admin	\$ 127,991				\$ 127,991	
CHDO Reserve - Homeownership Programs	\$ 548,454				\$ 114,000	\$ 434,454
2021 Habitat CHDO - Rogers Rd	\$ 176,178				\$ 50,000	\$ 126,178
2022 Habitat CHDO - Violet Phase II	\$ 191,988				\$ 64,000	\$ 127,988
2023 CHDO Reserve	\$ 180,288					\$ 180,288
CHDO Operating - Community Investment Programs	\$ 100,000	\$ 50,000			\$ 100,000	\$ 50,000
2022 Habitat CHDO Operating - Rogers Rd	\$ 50,000				\$ 50,000	
2021 Habitat CHDO Operating - Violet Phase II	\$ 50,000				\$ 50,000	
2023 CHDO Operating		\$ 50,000				\$ 50,000
Rental Housing Programs	\$ 2,251,671	\$ 599,541		\$ 542,847	\$ 1,700,000	\$ 1,694,059
BHP Mount Calvary - New Construction	\$ 2,000,000				\$ 1,600,000	\$ 400,000
2022 Broomfield Tenant Based Rental Assistance (TBRA)				\$ 425,660	\$ 100,000	\$ 325,660
2023 Broomfield Tenant Based Rental Assistance (TBRA)				\$ 117,187		\$ 117,187
Rental Housing Programs	\$ 251,671	\$ 599,541				\$ 851,212
Homeownership Programs	\$ 22,120	\$ 134,712			\$ 22,120	\$ 134,712
2020 Habitat Violet - remainder	\$ 22,120				\$ 22,120	
Homeownership Programs		\$ 134,712				\$ 134,712
Total	\$ 3,050,236	\$ 784,253	\$ -	\$ 542,847	\$ 2,064,111	\$ 2,313,225
2023 HOME Consortium Allocation					\$ 1,201,920	
Prior Year HOME Carryover Resources					\$ 3,175,416	
Total					\$ 4,377,336	
City of Boulder 2022 CDBG Funding Allocation						
					2023 Anticipated Expenditures	Future Years Anticipated Expenditures
Administration	\$ 161,672				\$ 161,673	\$ -
2021 CDBG Admin - remainder	\$ 79,332.59				\$ 79,333	
2022 CDBG Admin	\$ 82,339.56				\$ 82,340	
Rental Housing Programs	\$ 600,000				\$ 300,000	\$ 300,000
Rental Housing Programs	\$ 600,000				\$ 300,000	\$ 300,000
Housing Stabilization Programs	\$ 120,000				\$ 120,000	\$ -
2022 Family Resource Schools (public service)	\$ 120,000				\$ 120,000	
Community Investment Programs	\$ 947,421				\$ 100,000	\$ 847,421
2022 Section 108 Loan Repayment	\$ 475,000					\$ 475,000
Community Investment Programs	\$ 472,421				\$ 100,000	\$ 372,421
Homeownership Programs	\$ 177,116				\$ 77,116	\$ 100,000
2022 Housing Rehab	\$ 77,116				\$ 77,116	\$ -
2023 Housing Rehab	\$ 100,000					\$ 100,000
Economic Development Programs	\$ 50,000				\$ 50,000	\$ -
2023 Microenterprise	\$ 50,000				\$ 50,000	
General Unallocated						\$ -
Total	\$ 2,056,209				\$ 808,789	\$ 1,247,421
2023 CDBG Allocation					\$ 817,489.00	
Prior Year CDBG Carryover Resources					\$ 1,122,310.34	
Anticipated 2023 CDBG Program Income					\$ 116,409.74	
Total					\$ 2,056,209.08	
City of Boulder 2020 CDBG-CV Funding Allocation						
Rental Housing Programs	\$ 706,772					
Boulder Shelter Acquisitions	\$ 706,772					
Total	\$ 706,772					
City of Boulder Section 108 Loan						
Homeownership & Economic Development	\$ 4,000,000					
Modular Production Factory	\$ 4,000,000					
Total	\$ 4,000,000					

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

In the past five years, members of the Consortium have primarily focused housing investments on preserving and creating affordable rental housing and lasting improvements for many low-to-moderate income households. This has included the acquisition and/or rehabilitation of existing units; construction of new units; development of supportive, transitional housing units; and preservation of public housing units. Members of the Consortium also funded owner-occupied emergency and mobile home repairs and homeownership opportunities, provided housing counseling and consumer debt counseling, provided internet access and computers to low-income families to bridge the digital divide, invested in the capital improvement needs of service providers and public services, and assisted people experiencing homelessness and other special needs populations with supportive services.

Broomfield has successfully continued to use its HOME Funds to continue the Tenant Based Rental Assistance Program (TBRA). This successful program is even more critical in times of high rental costs and economic uncertainty for low-income households. Broomfield has enrolled 75 families into the TBRA program, with over an 80 percent success rate of families graduating and reaching their self-sufficiency goals.

Specific examples of recent housing development include but are not limited to:

- Completion of 30 Pearl, bringing 120 units, including permanent supportive housing and resources dedicated to persons with intellectual and developmental disabilities;
- Completion of Tungsten Village, adding 26 affordable rental homes in the Town of Nederland, CO; and
- Creating 73 permanently affordable homes with the completion of The Spoke on Coffman in Longmont, CO. The project also includes a 262-space parking deck with bike and electric vehicle charging for residents and downtown employees, a commercial space with an enterprise café, and office space.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Pursuant to the Boulder Broomfield Regional Consortium Citizen Participation Plan, this Action Plan allowed for reasonable notice for accessibility, review, and comment, as well as a comment period prior to submission of 30 days. Boulder was given thirty (30) days to comment on the Action Plan. Notices were published in various newspapers, websites, newsletters and press releases. A hybrid public hearing will be held on April 24, 2023 for the City of Boulder. An in-person public hearing will be held on June 20, 2023 for the City of Longmont. A hybrid public hearing was held on June 13, 2023 for the City of Broomfield.

- A public comment period for the City of Boulder began on April 6, 2023 and was open for 30 days.
- A public comment period for the City of Longmont began on May 22, 2023 and was open for 30 days.
- A public comment period for the City of Broomfield began on May 31, 2023 and was open for 30 days.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Aaron Stoddard – Objects to use of \$4M for project. Design will not work. Location will not work. Will not add net increase of homes. No description of building beyond building use after 10 years.

Alex Cassidy –The environmental review is incomplete and inaccurate. Factory construction and factory operations traffic should be included to understand impacts on nearby open space and nearby mobile home park. HUD funds should be revoked until a new EA is completed and compliance with all EA procedural requirements, including public notification, alternative site study, traffic study including BVSD campus study, impacts to factory construction traffic, acoustic study, anticipated increase in air and noise pollution, noise and emissions pollution evaluation including existing ozone and truck emissions standards.

Alvin Schurman – Opposed to the Section 108 loan to construct the modular home factory. Many of the statements in the original Environmental Assessment (or EA) included in the loan application appear invalid. Loan money must not be applied to factory construction until EA findings are re-evaluated, corrections made and the public comment period for findings is posted and re-opened.

Becky Morley – Opposed to the HUD loan to construct the modular home factory due to impacts such as noise and light pollution, impacts to the marsh on 63rd, nearby wildlife, zoning, and errors in the environmental assessment. Advance notice by BVSD and the city regarding project.

Bill Plats –Opposed to the modular production factory project due to inaccurate environmental assessment. Negative impacts include nearby sombrero marsh, wildlife habitat, sound pollution, increased traffic/noise, chemical fumes and impacts to open space and Native American land.

Charles Hardesty – Objects to HUD loan to build the modular home factory. Will increase traffic, noise, negatively impact wildlife and the nearby marsh. Issues with zoning. Consider possible alternate sites.

Cindy Warren – Objects to release of HUD funds for the modular production factory. Irregularities with the environmental assessment and FONSI. Will negatively impact Sombrero marsh, wildlife, wetlands, open space and overall environment.

Clay Thompson – Opposed to the use of Section 108 HUD loan for the construction of the modular production factory. The original EA included in the loan application appear invalid. Loan money must not be applied to factory construction until the EA findings are re-evaluated, corrections made and the public comment period for findings is posted and reopened. Additionally, the modular home factory is not part of the Boulder Master Plan. The area is zoned public. It is not zoned industrial.

Dan & Amy Hoskins – Opposed to the use of Section 108 loan for the construction of the modular production factory. Will negatively impact nearby marsh, wetlands, neighboring residents, air pollution, traffic impacts/noise, acoustics/noise pollution, and open space. Found errors in the EA; new one must be completed.

David Hsu – Project violates public zoning and citizen participation was not followed. The EA assessment included in the loan application was invalid. EA findings need to be reevaluated with another opportunity for public comment.

Dennis Spano – Objects to use of federal funds allocated for the modular production factory at the proposed site. Included an Open Space Board of Trustees (OSBT) draft letter to city council regarding assessment over proposed annexation agreement stated natural and financial impacts to the Sombrero Marsh open space, and sited concerns over building siting and access to the site. Draft was never adopted.

Donna George – Problems with the EA and FONSI. Site for factory is close to wetlands (sombrero marsh, east boulder ditch and enterprise ditch). Ecological impacts were not considered that will impact Sombrero Marsh, wildlife, wetlands and endangered species. Fish and wildlife consultation error discovered. No Fish & Wildlife, or Army Corps of Engineers was completed prior to RROF. Noise issues from construction traffic and factory production will impact surrounding wildlife and neighborhoods.

H. Cassidy – Opposed to Section 108 loan for the construction of the modular production factory. Found errors with the EA. Need to address traffic study, acoustic study, air pollution, impacts to wildlife, endangered species, Sombrero Marsh and other environmental impacts of construction. HUD funds should be withheld until a new EA has been completed and in compliance.

JC Oliverio – Stated concerns that include impacts on Sombrero Marsh, heavy truck traffic, no sound/acoustic study, and alternate sites were not considered.

Joe Prizzio – City compromised the loan application and is asking for application to be voided due to procedural deficiencies. Process should begin anew. Citizen participation was not followed. Found flyers about the project, but no opportunity for public comment on the modular production factory. Hearings for the ConPlan do not include the factory project. 2020 Action Plan mentioned the project but didn't list a physical address for the project. Comment period didn't include provision for a public hearing. The city didn't notify the community (in writing) regarding the project site.

Kate Myers – Suggested using land for other purposes, such as pollinator garden. Stated concerns regarding environmental impacts to Sombrero Marsh, completion of a traffic study, number of students anticipated to use the facility and expected tax revenue from factory.

Kerry Landsman – Opposed to the use of Section 108 loan for the construction of the modular production factory. Will negatively impact nearby marsh, wetlands, neighboring residents, air pollution, traffic impacts/noise, acoustics/noise pollution, and open space. Found errors in the EA; new one must be completed.

Marc Rosenberg – Objects to modular production factory. Found issues with the EA and FONSI, city and county zoning laws, environmental impacts, impacts to Sombrero Marsh, traffic concerns, heavy truck traffic. Project will not produce a net increase in the number of low-income housing units.

Michael Phelps – Opposed to the use of Section 108 loan for the construction of the modular production factory. Will negatively impact nearby marsh, wetlands, neighboring residents, air pollution, traffic impacts/noise, acoustics/noise pollution, and open space. Found errors in the EA; new one must be completed.

Rona Cantor – Objects to the use of the Section 108 loan for the construction of the modular production factory. Objects to using the educational component as the work will be done by Habitat volunteers and/or paid employees. Concerned about noise.

Seth Waldman – Opposed to the use of Section 108 loan for the construction of the modular production factory. Will negatively impact nearby marsh, wetlands, neighboring residents, air pollution, traffic impacts/noise, acoustics/noise pollution, and open space. Found errors in the EA; new one must be completed.

Stacy Stoutenberg – Worried about Sombrero Marsh. It is bone dry at this time. I have lived here 22 years and it does not support the factory as it will negatively impact the marsh.

Steve Liedtke – Opposed to project. City violated many policies and has not followed procedures. Lives on opposite side of marsh, which is currently dry. This project will dramatically impact wildlife.

Tina Fields – Opposed to the modular production factory. A new EA needs to address concerns to nearby Sombrero Marsh, wetlands, open space, zoning, traffic pollution, heavy truck traffic, site location, and social justice concerns to nearby Columbine mobile home park.

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

See above.

7. Summary

See above.

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

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

Agency Role	Name	Department/Agency
CDBG Administrator	BOULDER	Department of Housing & Human Services
HOME Administrator	BOULDER	Department of Housing & Human Services

Table 1 – Responsible Agencies

Narrative

Lead Agency

The City of Boulder is the lead entity for preparing the Consortium Consolidated Plan in conjunction with its members. Each jurisdiction that receives a direct allocation of CDBG funding, as explained in the introduction, including the City of Boulder, City of Longmont and City and County Broomfield, contributed to this section of this plan.

For administration of grants, each of the jurisdictions listed above administers and separately reports its own CDBG allocation and many of its related activities. As the lead agency of the Consortium, the City of Boulder assumes the responsibility of administering the HOME funds with each jurisdiction overseeing administration of the specific HOME projects for which it has been awarded funding.

Local Agencies Involved

The City of Longmont Housing and Community Investment (HCI) Division has the leadership responsibility for its CDBG program. HCI staff coordinates the implementation of all projects and programs that are funded; as well as provides technical assistance to community organizations, and encourage the involvement of the business community. A Technical Review Group and the Housing and Human Services Advisory Board review all CDBG, HOME and local funding proposals and offer funding recommendations to Longmont City Council.

The Broomfield CDBG program is administered through its Economic Vitality & Development Department. Broomfield's CDBG programs are managed in part by city staff who manage applications and oversight for the small business assistance program, and in part, through a subrecipient that administers and manages the homeowner rehabilitation program and other program activities which are determined annually as part of the Annual Action Plan approved by the Broomfield City Council.

Consolidated Plan Public Contact Information

Corina Marin, Grants Administrator

City of Boulder, Department of Housing & Human Services

P.O. Box 791, Boulder Colorado 80306

(303) 441-4134 (direct), MarinC@bouldercolorado.gov and <https://bouldercolorado.gov/services/affordable-housing-investments>

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

1. Introduction

Citizen participation is an integral part of the planning, evaluation, assessment, and implementation processes of the City of Boulder's Department of Housing and Human Services. The purpose of this Citizen Participation Plan (the Plan) is to provide citizens of Boulder with the opportunity to participate in the Community Planning and Development (CPD) programs. Boulder recognizes the importance of citizen participation and endorses a philosophy that welcomes and maximizes citizen involvement in its housing and community development activities.

The Consortium maintains a robust and ongoing public participation process for all work and program items benefitting from community conversation and input. The Consortium regularly consults and coordinates with affordable housing providers, homeless service providers, human service agencies, advisory boards and city council. Input from our partners is reflected in our day-to-day operations, programs and projects. The Consortium continuously seeks to improve communication strategies with impacted stakeholders and underrepresented groups.

In order to engage a diverse cross section of the community, public notices in local newspapers, websites, community newsletters and press releases for citizen input opportunities are sent out broadly to community partners and the general public. Hybrid public hearings will be scheduled in person and virtually.

The Consortium is moving forward to reduce the digital divide by ensuring that new construction and substantial rehabilitations of multifamily rental housing include installation of Broadband infrastructure. This is further supported through locally funded assistance and computer literacy programs. Further information regarding Broadband infrastructure can be found in the 2020-2024 Consolidated Plan Section MA-60.

Consortium members are committed to tackling climate crises and work with HUD and non-HUD funded efforts to build resilient infrastructure, pursue environmental justice equitably, and to strengthen economic mobility. Further information regarding resiliency can be found in the 2020-2024 Consolidated Plan Section MA-65.

The Consortium works with the Department of Veteran's Affairs (VA) and other partners to address the unique needs of lower income veterans. The needs of veterans are considered and assessed in the 2020-2024 Consolidated Plan. Please refer to the 2020-2024 Consolidated Plan for more information.

The Consortium members actively coordinate with the public, other housing providers, and partner agencies through:

- Working closely with housing and service providers to prepare applications, develop eligible activities and projects that meet the needs of the community, provide technical assistance and project management to ensure successful programming;
- Enhancing affiliations with local and regional boards, committees, and coordination efforts;
- Developing strong working relationships and strategizing with local providers; and
- More specifically, enhancing coordination of services and fill service gaps in the Consortium area.
- Engage with institutions that can potentially discharge people into homelessness including: Boulder Community Health, Clinica, Boulder County Jail, TGTHR, and other criminal justice and/or mental health institutions. Coordination of housing or sheltering services is conducted through a coordinated approach to discharge and is a key component of the Boulder Interagency Taskforce on Unhoused High System Utilizers.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).

Boulder County Funders Collaborative - The major governments in the Consortium have joined to provide a common approach to defining, assisting, and funding human service agencies.

Boulder Interagency Taskforce on Unhoused High System Utilizers - The mission of the Interagency Taskforce is to reduce “the impact of unsheltered homelessness on community resources through data-rich inquiry, individual-based solutions, and advocacy for innovative responses.” The leadership team of this effort includes senior - and generally the most senior - executives of the city’s Police, Fire, Municipal Court, Housing and Human Services, City Manager and City Attorney’s departments; Boulder County’s Sheriff, District Attorney and Department of Community Services; Mental Health Partners; and Boulder Community Health.

Homeless Solutions for Boulder County (HSBC) – The governments of the City of Boulder, City of Longmont, and Boulder County, combined with local housing authorities and nonprofit service providers, established HSBC to collaboratively address the needs of single adults experiencing homelessness. This includes a data management system with a single-entry portal for homeless people that allows agencies to share and maintain information. The group has added voucher capacity, worked to establish additional engagement among landlords in the area by hiring a landlord specialist to recruit new landlords and establish relationships with current landlords; developed a standard of care for case management, and created a tracking method to capture the housing inventory in the county. This group has been effective in moving persons experiencing homelessness into permanent housing through various housing exits.

Boulder County Homeownership Programs Collaborative – This group is made up of homeownership program providers in the County. It meets to identify common needs and goals, address gaps in service delivery, and marketing opportunities to provide seamless homeownership program service delivery throughout the County.

Boulder Broomfield HOME Regional Consortium – The 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.

Boulder County Regional Housing Partnership – The BCRHP was formed in 2016 around a model of regional collaboration reflected in the 2013 – 2015 post-flood housing recovery work which led to over 1,000 new rental homes being constructed throughout Boulder County in about three years. BCRHP set a goal of ensuring that 12% of all housing in the County would be permanently affordable by 2035, developed a set of strategies to achieve the goal, and helped coordinate adoption of resolutions of support for the Boulder County Regional Housing Plan by all jurisdictions in Boulder County. Significant progress has been made with three municipalities that have implemented Inclusionary Zoning ordinances. BCRHP has put together an approach to provide capacity to the smaller municipalities for regional compliance/monitoring of affordable rentals, expansion of a regional affordable home ownership program as well as a County wide eviction prevention program.

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 Consortium supports and is affiliated with the Metro Denver Homelessness Initiative (MDHI), a coalition working with homeless assistance agencies in the seven-county Denver metropolitan area, to coordinate the delivery of housing and services to homeless families, individuals, youth and people with disabilities. MDHI is the lead agency in establishing the Continuum of Care model for the metropolitan Denver community. The Executive Director of MDHI serves on the HSBC Executive Board.

HSBC serves as a localized coordinated entry system that matches needs of single adults, age 18 and older, with resources. This is a requirement for all residents to receive these specific services from Boulder County, Boulder, and/or Longmont. Entry points are located in Boulder and Longmont, both of which are accessible to people with disabilities and located close to public transportation.

HSBC is aligned with MDHI and functions in coordination with MDHI's prioritization processes for housing placement and has leveraged other housing options, such as Permanent Supportive Housing and locally funded and HUD funded set aside Housing Choice Vouchers by the local Housing Authorities to fill service gaps. A similar system is being researched for families and youth.

The City and County of Broomfield relies primarily on the resources of Boulder County and the City and County of Denver, as well as services provided through the local Continuum of Care agencies, such as Almost Home, to help meet needs for their residents who are experiencing homelessness, as there are no shelters or transitional housing options in Broomfield. Broomfield also provides federal Community Service Block Grant (CSBG) funds, received through the state of Colorado, for emergency assistance and homelessness prevention. Broomfield Human Services contracts with Almost Home for the Severe Weather Action Plan (SWAP) as Broomfield's only non-congregate sheltering options for people experiencing homelessness in Broomfield.

In Broomfield, local funding sources supplement ESG: for example, Broomfield's CSBG funds are used to provide emergency one-time rental, utility and/or mortgage assistance to prevent homelessness.

Supporting consultation efforts, Broomfield regularly meets and consults with key regional agencies and organizations, including: the Broomfield Housing Alliance; city agencies including Broomfield Department of Human Services, Broomfield Department of Public Health, Senior Services, Arts and Libraries, and others; community and regional non-profit service providers and resources such as Broomfield FISH, the Refuge, and Colorado Housing Connects; close and neighboring jurisdictions (housing, economic development, and business services departments); state partners such as the Colorado Housing and Finance Authority (CHFA), the Colorado Department of Local Affairs, and the Colorado Office of Economic Development and International Trade.

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

The Cities of Longmont, Boulder, and Broomfield are not entitlement communities for ESG and therefore coordinate funding requests through MDHI and the State. Boulder County Human Services division, under the Department of Housing & Human Services, receives federal Emergency Solutions Grant (ESG) funds. The county, along with several local human services agencies, works with local jurisdictions and the Continuum of Care toward the prevention of homelessness and provide rapid rehousing. These funds are provided to local shelters to support operations and essential services. MDHI develops standards and policies for ESG funding, and the county, cities, and nonprofit and agency partners have input into those standards and policies.

The implementation of HMIS at the local level aligns with the policies and procedures set by MDHI around client confidentiality, data collection, computer entry, and reporting. Additionally, Homeless Solutions for Boulder County (HSBC) utilize the County's local client portal which supports data collection and reporting, particularly for local coordinated entry, shelter attendance, and evaluation of system effectiveness. HSBC members participate with MDHI for continuous discussion regarding the use

and administration of HMIS, and connection to the local system, specifically addressing issues of duplication and ease of use. Additionally, HSBC work groups meet regularly to enhance data collection and quality and actively participate in numerous MDHI working groups.

In addition, Boulder County Housing and Human Services is a subrecipient of Emergency Solutions funds through MDHI for Rapid Rehousing rental subsidies and provides match funds to provide case management supportive services for individuals matched through the CoC OneHome prioritization process.

Boulder County Community Services is also a recipient of Emergency Solutions grant funds through the State of Colorado, in partnership with MDHI, to fund Street Outreach and Engagement activities through the county and has been successful at moving individuals directly from the Unsheltered homelessness to housing.

In Broomfield, local funding sources supplement ESG: for example, Broomfield's CSBG funds are used to provide emergency one-time rental, utility and/or mortgage assistance to prevent homelessness.

2. Agencies, groups, organizations and others who participated in the process and consultations

Table 2 – Agencies, groups, organizations and others who participated in the process and consultations.

1	Agency/Group/Organization	BOULDER HOUSING PARTNERS
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	
2	Agency/Group/Organization	EMERGENCY FAMILY ASSISTANCE ASSOC
	Agency/Group/Organization Type	Housing Services - Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	

3	Agency/Group/Organization	FLATIRONS HABITAT FOR HUMANITY
	Agency/Group/Organization Type	Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	
4	Agency/Group/Organization	BOULDER SHELTER FOR THE HOMELESS
	Agency/Group/Organization Type	Housing Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	
5	Agency/Group/Organization	MENTAL HEALTH PARTNERS
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities Services-Health
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Non-Homeless Special Needs Mental and behavioral health

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	
6	Agency/Group/Organization	BOULDER COUNTY
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	
7	Agency/Group/Organization	SAFEHOUSE PROGRESSIVE ALLIANCE FOR NONVIOLENCE, INC.
	Agency/Group/Organization Type	Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Through coordinated engagement, agencies throughout the region were consulted through a variety of methods that included stakeholder engagement, community meetings, city council meetings and public hearings.

8	Agency/Group/Organization	Boulder Interagency Taskforce on Unhoused High System Utilizers
	Agency/Group/Organization Type	Services – homeless Services – health Health agency Publicly Funded Institution/System of Care Other government - local
	What section of the Plan was addressed by Consultation?	Homeless Needs – chronically homeless Homeless Needs – families with children Homelessness Needs – veterans Homelessness Needs –unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Engage with institutions that can potentially discharge people into homelessness including: Boulder Community Health, Clinica, Boulder County Jail, TGTHR, and other criminal justice and/or mental health institutions. Coordination of housing or sheltering services is conducted through a coordinated approach to discharge and is a key component of the Boulder Interagency Taskforce on Unhoused High System Utilizers.

Identify any Agency Types not consulted and provide rationale for not consulting.

No agencies were expressly not consulted. Action Plan processes are also informed through consultation with various stakeholders.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Metro Denver Homelessness Initiative	Homelessness prioritization and housing opportunities
PHA Strategic and Development Plans	Housing Authorities within Consortium	Development and voucher coordination
Homeless Solutions for Boulder County Strategic PI	Homeless Solutions for Boulder County	System Housing First activities
BC Regional Housing Partnership Work Plan	Boulder County Regional Housing Partnership	Development coordination
Family Resource Network Work Plan	Family Resource Network	Family homelessness and community development

Table 3 – Other local / regional / federal planning efforts

Narrative

As much of housing and community development work is conducted regionally and collaboratively, the consortium also solicits input from a variety of nonprofit housing and social service providers.

AP-12 Participation - 91.401, 91.105, 91.200(c)

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

Community engagement is designed to be inclusive and representative of a diverse set of target groups that have disproportionate housing needs. All data collected via the extensive outreach efforts performed at that time has been utilized to support the strategy and development of the 2023 Action Plan.

Consortium staff designed a comprehensive approach to outreach to inform residents. The Citizen Participation Plan is available on the City of Boulder's website.

The 2023 Action Plan was posted on Boulder's website. Notice of the 30-day comment period was published on the website, in local papers, sent out as a press release and via a newsletter. A hybrid public hearing was held on April 24, 2023 for the City of Boulder. An in person public hearing will be held on June 20, 2023 for the City of Longmont. A hybrid public hearing was held on June 13, 2023 for the City of Broomfield. Notices contained the nondiscrimination and ADA/Section 504, as well as the TDD phone number, stated (in Spanish) that Spanish or other translation was available and offered hard copies upon request.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response / attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	Non-targeted/broad community	NA	NA	NA	
2	Public Hearing	Non-targeted/broad community	30 attendees	Opposition to funding Modular Production Facility (summary page 4)		https://tinyurl.com/dbwfuram

Sort Order	Mode of Outreach	Target of Outreach	Summary of response / attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Internet Outreach	Non-targeted/broad community	NA	NA	NA	https://boulderColorado.gov/services/affordable-housing-investments
4	Other: Community Newsletter	Non-targeted/broad community	NA	NA	NA	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

This section discusses the resources that will be used to meet the goals of this Plan for the City of Boulder (CDBG) and the HOME Consortium. These resources are financial, involve partnership opportunities, and include ability to leverage additional funds.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				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	817,489	116,410	1,122,310	2,056,209	815,000	ConPlan Remainder = \$815,000 x 1 year = \$815,000 Received: 2020 = \$824,551 2021 = \$844,606 2022 = \$808,365 2023 = \$817,489
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,201,920	0	3,175,416	4,377,336	1,200,000	ConPlan Remainder = \$1,200,000 x 1 year = \$1,200,000 Received: 2020 = \$1,186,669 2021 = \$1,174,519 2022 = \$1,279,918 2023 = \$1,201,920

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 4				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Section 108	public - federal	Admin and Planning Housing New construction for ownership Other	4,000,000	0	0	4,000,000	0	HUD approved the loan in 2022 and the loan contract will be executed once construction of the Affordable Housing Modular Factory begins in mid-2023.
Other CDBG-CV	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	0	0	706,772	706,772	0	Remainder of federal 2020 CDBG-CV funds provided in response to COVID-19.

Table 2 - 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

In addition to the receipt of federal CDBG and HOME funds, each location has significant local resources to use in leveraging HOME and CDBG funding.

- The City of Boulder's Affordable Housing Fund (AHF) generates widely fluctuated revenues of cash-in-lieu and linkage fees (between 2019 – 2022) for a combined average of \$11M as a result of the City of Boulder Inclusionary Housing ordinance.
- Boulder's Community Housing Assistance Program (CHAP) is funded primarily through property tax and a Housing Excise Tax and generates approximately \$3.4M annually.
- Each jurisdiction assists people with lower AMI with a social service network. For example, the City of Boulder provides assistance through the Human Services Fund, the Health Equity fund, and the Substance Education and Awareness (SEA) Fund.
- Boulder's General Fund homelessness division funds a multitude of services, including but not limited to the provision of locally funded permanent supportive housing (PSH) vouchers and case management services associated with housing development.
- Each jurisdiction allocates local funds to projects which are an eligible match contribution to satisfy HOME match requirements, and members of the consortium prefer to not have local funding be the sole source of funding for a project or program. Eligible match sources include, but are not limited to, non-federal funds, tax credit proceeds, Private Activity Bonds, municipal

General Fund monies, lending institutions, foundations, government entities (county or state), earned revenue, volunteer time, and in-kind donations. Other things being equal, applications with greater matching sources will receive favorable consideration.

- The Consortium works with public housing authorities and HOME subrecipients to ensure the HOME match requirement is satisfied.

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

During the five years of the Consolidated Plan, the City of Boulder is working with partners on the following redevelopment opportunities that will address the needs of the plan including:

- Ponderosa Mobile Home Park. The City purchased this 68-lot community in 2017 with CDBG-DR (Disaster Recovery) funds. The park's nearly 200 residents are primarily families of Latin descent and people with special needs. Section 108 funds are being used to develop a modular housing factory, the first project of which will be to provide housing for Ponderosa development. City of Boulder entitlement CDBG Funds will be used to repay the Section 108 loan funds.
- Alpine-Balsam. The Alpine-Balsam property, formerly the Boulder Community Health (BCH) hospital, was purchased by the City of Boulder in 2015. The City of Boulder is embarking on the multi-year process to redevelop Alpine-Balsam motivated by the desire to shape the redevelopment of an area that has been focused around a major healthcare facility for decades, to address the city's decentralized service challenges by creating a City Service Center, and to address critical affordable housing needs. Current plans estimate that the parcel could potentially hold 100-200 affordable housing units.

Discussion

See discussion above.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

Goals Summary Information

Goal	Category	Geographic Area	Needs Addressed	Funding	
Rental Housing Programs	Affordable Housing	Boulder/Broomfield HOME Consortium Region	Rental Housing Programs	CDBG :	\$600,000
				HOME :	\$3,394,059
				Other - CDBG-CV1 :	\$112,527
				Other - CDBG-CV3 :	\$594,245
	Start Year: 2020	End Year: 2024	Outcome: Affordability	Objective: Provide decent affordable housing	
	Narrative:				
	Preserve existing and increase the amount and affordability of rental housing for the Consortium’s lowest income renters. Activities include Broomfield TBRA Program, construction funding for affordable rental multi family housing.				
	Goal Outcome Indicator		Quantity	UoM	
	Rental units constructed		60	Household Housing Unit	
	Rental units rehabilitated		10	Household Housing Unit	
	Housing for Homeless added		3	Household Housing Unit	
	Tenant-based rental assistance / Rapid Rehousing		10	Households Assisted	
Other		0	Other		

Housing Stabilization Programs	Homeless	Boulder/Broomfield HOME Consortium Region	Housing Stabilization Program	CDBG : \$120,000	
	Affordable Housing				
	Start Year: 2020	End Year: 2024	Outcome: Affordability	Objective: Prevent, prepare for, and respond to coronavirus	
	Narrative: The city will continue funding its successful Family Resource Schools programs, which provides case management and individual assistance to families at five Boulder schools with large populations of low- and middle-income students.				
	Goal Outcome Indicator			Quantity	UoM
Public service activities for Low/Moderate Income Housing Benefit			200	Households Assisted	
Community Investment Programs	Non-Housing Community Development	Boulder/Broomfield HOME Consortium Region	Community Investment	CDBG : \$947,421	
				HOME : \$150,000	
				Section 108 : \$4,000,000	
	Start Year: 2020	End Year: 2024	Outcome: Sustainability	Objective: Create suitable living environments	
	Narrative: Revitalize and invest in the Consortium’s communities to ensure that all neighborhoods, particularly those of low/moderate income, enjoy a high quality of life for their residents. Activities include anticipated funding of CHDO Operating, Section 108 Loan Repayment, and construction of the Modular Production Facility which will build affordable housing.				

	Goal Outcome Indicator		Quantity	UoM	
	Other		4	Other	
Homeownership Programs	Affordable Housing	Boulder/Broomfield HOME Consortium Region	Homeownership Programs Existing Housing Homebuyer Programs	CDBG :	\$177,116
				HOME :	\$705,286
	Start Year: 2020	End Year: 2024	Outcome: Affordability	Objective: Provide decent affordable housing	
	Narrative:				
	New and Existing Owner-Occupied Housing Assistance Programs - Preserve existing affordable owner-occupied housing stock by keeping houses safe and habitable, help owners to age in place and provide foreclosure prevention services to all homeowners. Increase the supply of affordable housing units through the construction of new homeownership units affordable to low- and moderate-income home buyers. Activities include Habitat Violet, Habitat Rogers Rd, and construction of a Modular Production Factory which will produce affordable ownership homes.				
	Goal Outcome Indicator		Quantity	UoM	
	Homeowner Housing Added		17	Household Housing Unit	
Homeowner Housing Rehabilitated		10	Household Housing Unit		
Economic Development Programs	Other	Boulder/Broomfield HOME Consortium Region	Economic Development	CDBG :	\$50,000
	Start Year: 2020	End Year: 2024	Outcome: Sustainability	Objective: Create economic opportunities	
	Narrative:				
Increase the economic empowerment of residents to secure a stable income and begin to build wealth. Activities include the Microenterprise program, and construction of the Modular Production Factory which will provide education, training, and employment opportunities to local school district students.					

	Goal Outcome Indicator		Quantity	UoM	
	Businesses assisted		10	Businesses Assisted	
Administration	Other	Boulder/Broomfield HOME Consortium Region	Rental Housing Programs Homeownership Programs Existing Housing Homebuyer Programs Housing Stabilization Program Community Investment Economic Development	CDBG : \$161,673	
				HOME : \$127,991	
	Start Year: 2020	End Year: 2024	Outcome: Sustainability	Objective: Create suitable living environments	
	Narrative:				
	Costs incurred to plan for and administer the grant funds.				
	Goal Outcome Indicator		Quantity	UoM	
Other		0	Other		

Table 3 – Goals Summary

Goal Descriptions

1	Goal Name	Rental Housing Programs
	Goal Description	Preserve existing and increase the amount and affordability of rental housing for the Consortium's lowest income renters.
2	Goal Name	Housing Stabilization Programs
	Goal Description	The city will continue funding its successful Family Resource Schools programs, which provides case management and individual assistance to families at five Boulder schools with large populations of low- and middle-income students.
3	Goal Name	Community Investment Programs
	Goal Description	Revitalize and invest in the Consortium's communities to ensure that all neighborhoods, particularly those of low/moderate income, enjoy a high quality of life for their residents.
4	Goal Name	Homeownership Programs
	Goal Description	New and Existing Owner-Occupied Housing Assistance Programs - Preserve existing affordable owner-occupied housing stock by keeping houses safe and habitable, help owners to age in place and provide foreclosure prevention services to all homeowners. Increase the supply of affordable housing units through the construction of new homeownership units affordable to low- and moderate-income home buyers.
5	Goal Name	Economic Development Programs
	Goal Description	Increase the economic empowerment of residents to secure a stable income and begin to build wealth. Activities include the Microenterprise program.
6	Goal Name	Administration
	Goal Description	Costs incurred to plan for and administer the grant funds.

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 91.215(b)

See goals chart.

AP-35 Projects - 91.420, 91.220(d)

Introduction

The projects proposed for the 2023 program year are as follows.

#	Project Name
1	HOME Administration
2	CDBG Administration
3	2020 HOME Habitat Violet - remainder
4	2021 HOME CHDO Project – St Vrain Habitat Rogers Road
5	2022 HOME CHDO Project – Habitat Violet
6	2023 HOME CHDO Reserve
7	HOME BHP Mount Calvary – Rental New Construction
8	HOME Broomfield Tenant Based Rental Assistance (TBRA)
9	HOME CHDO Operating
10	HOME Rental Housing Programs
11	HOME Homeownership Programs
12	CDBG Family Resource Schools
13	CDBG Housing Rehabilitation
14	CDBG Microenterprise – Colorado Enterprise Fund
15	CDBG Section 108 Loan Repayment
16	CDBG Rental Housing Programs
17	CDBG Community Investment Programs
18	CDBG-CV Boulder Shelter Unit Acquisitions
19	Section 108 Loan – Modular Production Facility Construction

Table 4 – Project Information

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

The allocation of funds is closely aligned with the top housing and community development needs identified in the needs assessment, housing market analysis, and contributions by stakeholders and citizens who participated in the development of this Plan.

While scarcity of federal funding can create challenges in project prioritization, the Consortium has dedicated local funding to ensure progress toward affordable housing, homelessness, and community development needs. However, there are obstacles that impact the needs in the community: lack of developable land or potential infill sites, misalignment of available employment and affordable rents, recent inflationary trends compared to a stagnant minimum wage, high construction and development costs, high levels of chronic homelessness, increasing levels of relationship victimization, and enhanced mental and behavioral health challenges (with limited treatment or available counseling). To that end, projects and programs that address these obstacles are prioritized in this Action Plan.

AP-38 Project Summary

Project Summary Information

N o.	Project	Goals Supported	Geographic Areas	Needs Addressed	Funding
1	HOME Administration	Administration	Boulder/Broomfield HOME Consortium Region - Other	Community Investment Economic Development Homeownership Programs Existing Housing Homebuyer Programs Housing Stabilization Program Rental Housing Programs	HOME : \$127,991
	Description	Administration and planning costs			
	Target Date for Completion	12/31/2024			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	NA			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	NA			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Administration and planning			

2	CDBG Administration	Administration	Boulder/Broomfield HOME Consortium Region - Other	Community Investment Economic Development Homeownership Programs Existing Housing Homebuyer Programs Housing Stabilization Program Rental Housing Programs	CDBG : \$161,672
	Description	Administration and planning costs			
	Target Date for Completion	12/31/2024			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	NA			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	NA			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Administration and planning			
3	2020 Habitat Violet - remainder	Homeownership Programs	Boulder/Broomfield HOME Consortium Region - Other	Homebuyer Programs	HOME : \$22,120
	Description	New construction of homeownership units for low income households			
	Target Date for Completion	12/31/2024			

	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	4 - goal outcome indicators are represented in Project "2022 CHDO Reserve - Habitat Violet"			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Boulder			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Construction of new homeownership units in Boulder			
4	2021 CHDO Reserve - St Vrain Habitat Rogers Road	Homeownership Programs	Boulder/Broomfield HOME Consortium Region - Other	Homebuyer Programs	HOME : \$176,178
	Description	New construction of homeownership units for low income households.			
	Target Date for Completion	12/31/2025			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	9			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Longmont			

	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Construction of new homeownership units in Longmont by a CHDO			
5	2022 CHDO Reserve - Habitat Violet	Homeownership Programs	Boulder/Broomfield HOME Consortium Region - Other	Homebuyer Programs	HOME : \$191,988
	Description	New construction of homeownership units for low income households			
	Target Date for Completion	12/31/2024			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	4			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Boulder			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Construction of new homeownership units by a CHDO			
6	2023 CHDO Reserve	Homeownership Programs	Boulder/Broomfield HOME Consortium Region - Other	Homebuyer Programs	HOME : \$180,288
	Description	2023 CHDO Reserve Unallocated			
	Target Date for Completion	12/31/2025			

	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	NA			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	NA			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	2023 CHDO Reserve Unallocated			
7	BHP Mount Calvary Rental New Construction	Rental Housing Programs	Boulder/Broomfield HOME Consortium Region - Other	Rental Housing Programs	HOME : \$2,000,000
	Description	Funding supports development efforts in the construction of a 60-unit permanently affordable multi-family, senior rental project, including some permanent supportive designated units, to be owned and operated by Boulder Housing Partners.			
	Target Date for Completion	12/31/2025			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	60 senior units			
	Location Description (additional information for this discussion may be available on	Boulder			

	the AP-36 Project Detail screen)				
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Development/construction of a 60-unit permanently affordable multifamily senior rental project, to be owned and operated by Boulder Housing Partners, Boulder's Housing Authority.			
8	Broomfield TBRA	Rental Housing Programs	Boulder/Broomfield HOME Consortium Region - Other	Rental Housing Programs	HOME : \$542,847
	Description	Tenant based rental assistance			
	Target Date for Completion	12/31/2025			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	The annual average for households served is 10			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Broomfield			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Provide tenant based rental assistance			
9	CHDO Operating	Community Investment Programs		Community Investment	HOME : \$150,000
	Description	CHDO Operating costs			

	Target Date for Completion	12/31/2024			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	NA			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Boulder and Longmont			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	CHDO operating costs for two separate CHDOs using 2021 and 2022 HOME funds.			
10	HOME Rental Housing Programs	Rental Housing Programs	Boulder/Broomfield HOME Consortium Region - Other	Rental Housing Programs	HOME : \$851,212
	Description	Unallocated rental housing programs			
	Target Date for Completion	12/31/2026			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	NA			
	Location Description (additional information for this discussion may be available on	Boulder and Longmont			

	the AP-36 Project Detail screen)				
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Rental housing programs unallocated funding, 131,479 for Boulder from prior year carryover, and 599,541 for Longmont 2023 rotation			
1 1	HOME Homeownership Programs	Homeownership Programs	Boulder/Broomfield HOME Consortium Region - Other	Homebuyer Programs	HOME : \$134,712
	Description	Unallocated homeownership programs			
	Target Date for Completion	12/31/2026			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	4 low income households			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Longmont			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Homeownership programs unallocated funding 134,712 for Longmont 2023 rotation			
1 2	Family Resource Schools	Housing Stabilization Programs	Boulder/Broomfield HOME Consortium Region - Other	Housing Stabilization Program	CDBG : \$120,000
	Description	Family Resource Schools			

	Target Date for Completion	12/31/2024			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	200			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Boulder			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Public service dollars for the FRS program			
1 3	Housing Rehabilitation	Homeownership Programs	Boulder/Broomfield HOME Consortium Region - Other	Homeownership Programs Existing Housing	CDBG : \$177,116
	Description	Housing rehab			
	Target Date for Completion	12/31/2025			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	10			
	Location Description (additional information for this discussion may be available on	Boulder			

	the AP-36 Project Detail screen)				
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Minor home repair			
1 4	CDBG Microenterprise - Colorado Enterprise Fund	Economic Development Programs	Boulder/Broomfield HOME Consortium Region - Other	Economic Development	CDBG : \$50,000
	Description	Funding for operating expenses of the Colorado Enterprise Fund.			
	Target Date for Completion	12/31/2024			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	10			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Boulder			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Operating funds for the Colorado Enterprise Fund.			
1 5	Section 108 Loan Repayment	Community Investment Programs	Boulder/Broomfield HOME Consortium Region - Other	Community Investment Economic Development Homebuyer Programs	CDBG : \$475,000

		Homeownership Programs Economic Development Programs		Housing Stabilization Program	
	Description	Repayment for Section 108 Loan			
	Target Date for Completion	12/31/2024			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	NA			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Boulder			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Repayment of Section 108 Loan			
16	CDBG Rental Housing Programs	Rental Housing Programs	Boulder/Broomfield HOME Consortium Region - Other	Rental Housing Programs	CDBG : \$600,000
	Description	CDBG unallocated			
	Target Date for Completion	12/31/2025			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on	NA			

	the AP-36 Project Detail screen)				
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Boulder			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Unallocated rental housing programs			
17	CDBG Community Investment Programs	Community Investment Programs	Boulder/Broomfield HOME Consortium Region - Other	Community Investment	CDBG : \$472,421
	Description	Unallocated community investment programs			
	Target Date for Completion	12/31/2024			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	NA			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Boulder			
	Planned Activities (additional information for this discussion may be available on	Unallocated community investment programs			

	the AP-36 Project Detail screen)				
18	Boulder Shelter Unit Acquisitions_CDBG-CV	Rental Housing Programs Housing Stabilization Programs	Boulder/Broomfield HOME Consortium Region - Other	Housing Stabilization Program Rental Housing Programs	CDBG : \$706,772
	Description	2020 CDBG-CV Boulder Shelter Acquisitions			
	Target Date for Completion	12/31/2023			
	Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	3			
	Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Boulder			
	Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	2020 CDBG-CV Boulder Shelter Acquisitions			
19	Section 108 Loan	Community Investment Programs Homeownership Programs	Boulder/Broomfield HOME Consortium Region - Other	Community Investment Economic Development Homebuyer Programs Housing Stabilization Program	Section 108 : \$4,000,000

	Economic Development Programs			
Description	Construction of a modular production facility			
Target Date for Completion	12/31/2025			
Estimate the number and type of families that will benefit from the proposed activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	NA			
Location Description (additional information for this discussion may be available on the AP-36 Project Detail screen)	Boulder			
Planned Activities (additional information for this discussion may be available on the AP-36 Project Detail screen)	Construction of a modular production facility			

AP-50 Geographic Distribution - 91.420, 91.220(f)

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

Boulder Broomfield HOME Consortium Region

Geographic Distribution

Target Area	Percentage of Funds
Boulder/Broomfield HOME Consortium Region	100

Table 5 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Please see the Discussion section below for complete details of geographic areas of entitlement.

Discussion

HOME funds received by the Consortium have historically been distributed to the Consortium jurisdiction members based on a set percentage (City of Boulder – 44%, City of Longmont – 23%, Boulder County – 20%, City and County of Broomfield – 13%). Longmont oversees its own distribution of HOME funds. Broomfield has used its funds to support a Tenant Based Rental Program. Boulder oversees distribution of its HOME funds as well as the funds designated for Boulder County.

The HOME Consortium members employ a rotational distribution of funding through 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 will be 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 consortium utilizes a mixed approach which includes a limited application process, solicitation of applications from qualified organizations and an open-door unsolicited application process.

Affordable Housing

AP-55 Affordable Housing - 91.420, 91.220(g)

Introduction

Please see below for information related to the one-year affordable housing goals for the Boulder Broomfield HOME Consortium.

One Year Goals for the Number of Households to be Supported	
Homeless	3
Non-Homeless	74
Special-Needs	0
Total	77

Table 6 - 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	74
Rehab of Existing Units	0
Acquisition of Existing Units	3
Total	77

Table 7 - One Year Goals for Affordable Housing by Support Type

Discussion

The above numbers only reflect HOME defined units and do not include units supported through CDBG funding.

AP-60 Public Housing - 91.420, 91.220(h)

Introduction

Publicly supported housing plays a critical role in the provision of affordable housing, and this role expands in high cost housing markets. This includes provision of rental housing for residents with lower income as well as ownership housing for residents with moderate income created through public incentives or requirements. The Consortium is fortunate to have three public housing entities that own and operate affordable rental and deed-restricted for sale housing and administer housing choice voucher programs. Broomfield's Housing Authority administers a small number of vouchers allocated by the Colorado Department of Housing; the housing authority does not own or manage affordable rentals.

Actions planned during the next year to address the needs to public housing.

See Section AP-35.

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

According to the regional Analysis of Impediments to Fair Housing Choice (AI), which utilized data from area public housing authorities, housing authority clients largely have extremely low incomes. Many are older adults and are less likely to pursue ownership housing. For those interested in ownership, the most effective programs are likely land trusts and/or stabilizing ownership within mobile home park communities.

All housing authorities connect clients expressing an interest in ownership to area nonprofits specializing in homeownership and self-sufficiency.

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

There are no troubled housing authorities within the Boulder Broomfield Regional Consortium area.

Discussion

Please see above.

AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)

Introduction

Homelessness is a critical activity of Boulder and Broomfield counties. The Consortium has developed a wide-ranging response to homelessness, including coordinated outreach, case management, sheltering, housing, and funding. Funding is leveraged by Federal, state, and local resources, and the Consortium embraces a Housing First philosophy. In Boulder County alone, over 1,800 people experiencing homelessness have been exited from homelessness since late 2017. Current initiatives are centered on housing retention, peer support, day services, focusing on chronically homeless high utilizers of the criminal justice and healthcare systems, recovery housing and permanent supportive housing unit development. Over 150 units of permanent supportive housing are being developed over the next 18 - 24 months.

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.

Boulder County PJs coordinate single adult homelessness through Homeless Solutions for Boulder County (HSBC).

One-year goals for outreach and assessment include:

- Coordinated outreach provider meetings, including individual client staffing between outreach entities within the City of Boulder;
- Increased capacity of the Boulder Targeted Homeless Engagement & Referral Effort (BTHERE) and Longmont Targeted Homeless Engagement & Referral Effort (LTHERE) outreach teams, including the provision of Coordinated Entry and reunification services in the field. These are targeted outreach teams which include members with lived experience, mental health experience, and homeless service experience;
- Expansion of the City of Boulder Safe and Managed Spaces program to compassionately address camping in public spaces;
- Participation of all entities in the Point in Time Survey; and
- Longmont funding of housing focused outreach, including targeted outreach to connect unsheltered individuals to local Coordinated Entry services.
- Development of a day services center to centralize resources and provide engagement opportunities for individuals experiencing unsheltered homelessness and not already engaged in services.

Addressing the emergency shelter and transitional housing needs of homeless persons.

Emergency sheltering is coordinated across Boulder County leveraging local coordinated entry (CE) which is a standardized assessment that matches sheltering services aligned with the particular needs of individuals to expedite housing connection. One-year goals in sheltering and transitional housing

include:

- Financial support of consolidated adult homelessness services at Boulder Shelter for the Homeless for persons experiencing homelessness in the city of Boulder and for people who are in need of intensive sheltering services in Longmont;
- Development of a day service center in Boulder that can be flexed to meet emergency sheltering needs;
- Development of respite/recovery services in Boulder;
- Support of HOPE for Longmont to provide intake, assessment and sheltering along with housing focused outreach for individuals experiencing homelessness; and
- Continued Longmont funding of the OUR Center to provide basic needs for families and individuals experiencing and those at risk of homelessness.

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.

Homeless Action Plan initiatives being explored and implemented include:

- Strengthening landlord relationships to increase options for homeless individuals/families to gain housing, and for at-risk or formerly homeless people to retain housing;
- Continue BCHA's setting aside of up to 50 vouchers to be utilized for households that at initial screening met the McKinney-Vento Homeless Assistance Act definition and/or revised definition of homeless the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act). This local preference will be limited to applicants referred in through Boulder County's Community Housing Resource Panel and may include families transitioning from a Rapid Rehousing Program;
- Continuation of the set aside program with the local housing authorities: allocating 20% of prior year turnover Housing Choice Vouchers to clients coming through Homeless Solutions of Boulder County (HSBC), limited to single individuals and couples over the age of 18 referred in through HSBC clients as defined as clients who have completed HSBC screening, are currently enrolled in a Boulder County Permanent Supportive Housing or Rapid Rehousing Program, and/or who are on the HSBC high frequency utilizer list who are literally homeless as defined by the U.S. Department of Housing and Urban Development;
- Continuation of locally funded housing voucher programs through the cities of Boulder and Longmont. Within the City of Boulder, local vouchers are targeted to long-term utilizers of Boulder Shelter for the Homeless and persons associated with the municipal court system who

are otherwise experiencing chronic homelessness;

- Continuing the Emergency Housing Voucher program, in collaboration with the CoC and coordinated across jurisdictions and housing authorities;
- Establishing two residential sites for people experiencing homelessness who also are recovering from significant substance use disorder; and
- Development of Boulder's Building Home program – peer support, daytime programming, and a dedicated housing retention team aimed at building community and supporting housing retention for participants in permanent supportive housing.

The Consortium, primarily through Boulder County, will continue the following programs to help formerly homeless individuals and families transition from homelessness into permanent housing:

- Access to personal finance coaching;
- Public benefits screening, eligibility and enrollment – Families and individuals are screened for eligibility and enrolled in public benefits via PEAK (online benefits enrollment);
- 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.

The community confers regarding individuals experiencing homelessness who are being discharged from institutions and is currently working to formalize a system-wide discharge plan. Designated partners address specific needs of people exiting emergency healthcare, the criminal justice system, or mental health in-patient care.

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.

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

- 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.
- Funding longer-term stability for household transitioning from a Rapid Rehousing Program by issuing 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. In addition, 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 becoming homeless. This support includes:

Direct services

- Childcare subsidies for families who have low-income families
- 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

Community funding – local funds support

- Asset and income-building models such as Bridges Out of Poverty

Program

- 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 (e.g., ReFocus)

Discussion

Please see above.

AP-75 Barriers to affordable housing -91.420, 91.220(j)

Introduction

The most prevalent barrier to affordable housing in the Consortium region is extremely low vacancy rates and associated high rental prices. Lack of availability of housing in general continues to put upward pressure on already high prices to own and to rent in the region.

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.

Each member of the consortium has a Comprehensive Plan that contains a wide range of housing policies, including guidance on its underlying values, priorities, and collaborative efforts.

- Boulder County - <https://www.bouldercounty.org/property-and-land/land-use/planning/boulder-county-comprehensive-plan/>
- City of Boulder - <https://bouldercolorado.gov/projects/boulder-valley-comprehensive-plan>
- City of Longmont - <https://www.longmontcolorado.gov/departments/departments-n-z/planning-and-development-services/plans-and-reports/comprehensive-plan>
- City/County of Broomfield - <https://broomfield.org/2273/Comprehensive-Plan>

Discussion

Please see above.

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

Introduction

Other actions that the consortium will undertake to address housing and community development needs are summarized in this section.

Actions planned to address obstacles to meeting underserved needs.

Despite the Consortium's targeted use of federal and local resources to meet the underserved needs of the community, obstacles to meeting these needs will continue and require focus. The goals set forth in this plan position the Consortium to continue its focus on meeting needs in the areas of rental housing, owner-occupied housing, homeownership opportunities, homelessness assistance, and investing in target communities. The Consortium will continue to focus federal and local resources to meet these needs and work with partners to devise and support creative solutions—and additional federal resources associated with the Section 108 Loan will be instrumental in meeting new and increasing needs.

Since the last Consolidated Plan, covering years 2015-2019, the City of Boulder has initiated a regional housing plan with Consortium partner jurisdictions, developed a Middle Income Housing Strategy, a Manufactured Housing Strategy, and executed a housing work plan. That work plan contains several elements intended to address underserved needs by removing obstacles and leveraging opportunities in the built environment.

Actions planned to foster and maintain affordable housing.

Similar to the obstacles faced in meeting the underserved needs of Consortium Boulder residents, meeting the affordable housing needs of the community will continue to be a challenge. There are many causes for this:

- detached single-family homes that are increasingly only affordable to the wealthy
- attached homes, such as condos and apartments, that provide better affordability for middle-income households but are less attractive to families and often have repair needs
- the challenge of limited land supply and how to redevelop existing areas in ways that respond to the community's evolving housing needs in a manner consistent with other community values and priorities
- a finite amount of financial resources to meet these needs.

The Consortium will continue to leverage federal resources with local funds by enforcing local affordable housing ordinances. In addition, it will explore other tools and opportunities to preserve and create affordable housing options as discussed in the above section. Consortium members will continue to nurture relationships with for-profit developers able to help meet the affordable housing needs of low- and moderate-income households.

Actions planned to reduce lead-based paint hazards.

The Consortium will continue to support efforts that reduce the hazards of lead-based paint utilizing

HUD funds in conjunction with other available resources. Activities will include testing and evaluation, community education, and abatement of hazards.

Actions planned to reduce the number of poverty-level families.

The Consortium members will continue to focus their efforts and resources to reduce the number of families with income at or below the poverty-level through the preservation and creation of safe and affordable housing. The foundational importance of meeting the housing needs of these families will support their moves toward self-sufficiency. Continued and expanded coordination with available local funding such as the City of Boulder's Human Services Fund provides the opportunity to support the agencies serving these families. Expanded coordination with the economic vitality programs will provide opportunities for these families to gain training and skill-building, resources and supports that can lead them to achieving self-sufficiency.

Actions planned to develop institutional structure.

The City of Boulder Department of Housing & Human Services, Longmont Community Services Department, and Broomfield Economic Vitality and Development Department will continue to administer their respective CDBG programs. Activity selection and funding decisions will continue to be made in close coordination with local funding programs. These decisions will continue to be influenced by the expertise of advisory boards and committees, appointed by city and county management. The Consortium will also continue its regular coordination meetings with housing and service providers.

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

Already working closely and effectively with the local housing authorities and nonprofit housing providers, the Consortium will continue its close coordination while nurturing relationships with for-profit developers able to help meet the affordable housing needs of residents. The Consortium will continue to focus HUD Block Grant dollars on affordable housing opportunities and capital improvement needs of service providers, as well as continue to partner with community-based agencies to devise and support creative solutions to meet their capital improvements needs.

Discussion

Please see above.

Program Specific Requirements

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

Introduction

Projects planned with CDBG funds expected to be available during the year are identified below.

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	115,828
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.	4,000,000
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	8,549
5. The amount of income from float-funded activities	0
Total Program Income:	4,124,377

Other CDBG Requirements

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

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The Consortium leverages its HOME funds with other forms of investment including Low Income

Housing Tax Credits, private interest-bearing debt for rental housing development, grants of State of Colorado HOME funds, Federal Home Loan Bank Board grant funds, other private grant funds, and fundraising proceeds. Homeowners assisted by the HOME program use private interest-bearing debt to purchase homes.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The Consortium members who fund homeownership programs through HOME or CDBG use the resale provision when HOME funds are used for homebuyer activities as required in 92.254. When the first owner sells the home, it will be sold following the guidelines of the PJs Permanently Affordable Homeownership program. The new owner will be vetted by the PJ to confirm they meet the income and other requirements to qualify for the home. This process will be followed in perpetuity for each sale.

The City applies resale provisions in all homeownership programs where HOME funds are used. Resale of a property is required if the property is in the HOME period of affordability only to a buyer whose household qualifies as a low-income household and will use the home as the family's principal residence. Home buyers receiving HOME funds for down payment assistance will be subject to the requirements at 24 C.F.R. Part 92.254(a)(4) which include resale provisions for a period of years consistent with the program regulations. The resale provisions will provide owners with fair returns on their investments, including any improvements. Loans will be secured by a signed mortgage, promissory note, and lien filed against the property. The City of Boulder will place an index-based resale restriction on each unit assisted. In addition to the HOME affordability requirements, in accordance with the City of Boulder's funding policies, a covenant will be placed on the unit that will maintain its affordability in perpetuity.

The resale calculation formula is noted in each covenant. It starts with the original purchase price, reduced by excessive damage, increased by appreciation and increased by approved capital improvement credits, to arrive at the Maximum Sales Price.

The appreciation for most cases ranges from 1 to 3.5% per year. It is based on two indices: the change in the Consumer Price Index-Urban (CPI-U) or the change in the Area Median Income (AMI) whichever is less, with a guaranteed 1% increase and a max of 3.5% increase per year. Some older covenants had a negative appreciation or could go up to 4.5%.

Our resale formula is in place in order to keep the homes permanently affordable. Each household agrees to these price restrictions upon purchase of their home.

The original purchase prices of each home are targeted at specific AMI levels. Fair Return on

Investment is calculated annually and can be between 1 and 3.5 percent.

The City of Boulder reserves the right to allow lease-purchase options in conjunction with our homebuyer program on an as-needed basis for Habitat for Humanity clients. In such cases, ownership will be conveyed to an eligible homebuyer within 36 months of signing the lease-purchase agreement, or within 42 months of project completion. The affordability period of the unit will commence when the ownership of the unit is conveyed to the homebuyer.

At the end of the 36-month period, if the household occupying the lease-purchase unit is not eligible or able to purchase the unit, the PJ has an additional six months to identify a different eligible homebuyer to purchase the unit. In all cases, if a homebuyer does not purchase the unit by the end of the 42-month period, it must be converted to a HOME rental unit. In all cases, lease-purchase participants will receive housing counseling, in accordance with the HOME requirement that homebuyers receiving HOME assistance or living in HOME-assisted units must receive housing counseling.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Although no 2023 HOME funds will be used to acquire owner-occupied units, it is the Consortium's policy to use the resale provision that ensures the affordability of units acquired with HOME funds as required in 24 CFR 92.254(a)(4).

As stated above, the City of Boulder applies resale provisions when HOME funds are used including application of the prescribed affordability period and requirements stating that the buyer must qualify as a low-income household and will use the home as the family's principal residence. HOME funds are secured by an executed and recorded promissory note and lien filed against the property. In addition to the HOME affordability requirements, in accordance with the City of Boulder's funding policies, a covenant will be placed on the unit that will maintain its affordability in perpetuity. The amount subject to recapture is the direct subsidy received by the homebuyer.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

No 2023 HOME funds will be used to refinance existing debt secured by multifamily housing.

Per the HOME rules, existing debt on a multifamily property may be refinanced when HOME funds will be used for rehabilitation to permit or continue affordability. To be considered for HOME funds, the application for rehabilitation and refinance must, at a minimum: demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing; require a

review of management practices to demonstrate that disinvestment in the property has not occurred, that the long term needs of the project can be met and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated; state whether the new investment is being made to maintain current affordable units, create additional affordable units, or both; specify the required period of affordability, whether it is the minimum 15 years or longer; specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a federally designated Empowerment Zone or Enterprise Community; and state that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

The PJ does not intend to use HOME funds at this time to provide homebuyer assistance or for rehabilitation of owner-occupied housing.

Discussion:

Eligible applicants for HOME Investment Partnership Program funding include those certified as Community Housing Development Organizations (CHDOs), Housing Authorities, non-profit affordable housing developers, for-profit affordable housing developers. Generally funding applications are reviewed by the Consortium members on an ad-hoc basis and are evaluated against funding policies and procedures. Additionally, competitive fund rounds may be conducted to address specific goals. Detailed application package information can be found on the jurisdiction's website during an open funding process.

Attachments

Publisher's Affidavit

Citizen Participation Comments

Grantee SF-424's and Certification(s)

NOTICE OF PUBLIC COMMENT OPPORTUNITY ON
DRAFT 2023 ANNUAL ACTION PLAN
Boulder-Broomfield Regional HOME Consortium

In the interest of enhancing citizen participation, the City of Boulder, Boulder County, and the Boulder-Broomfield Regional Consortium request comments on their 2023 Action Plan for the Community Development Block Grant Program (CDBG) and HOME Investment Partnership Program (HOME). The Action Plan describes proposed spending of federal funds directed to the Consortium and Consortium members, local funds and other public and private funding. The draft Action Plan is available for public review at <https://bouldercolorado.gov/services/affordable-housing-investments>.

Notice is hereby given that the City of Boulder, Department of Housing & Human Services will hold a hybrid public hearing on Monday, April 24, 2023, at 10:00 a.m. You can join us in person or online.
Location: 1101 Arapahoe Ave, Boulder, CO 80302

Or via Zoom at the following link:

<https://tinyurl.com/dbwifuram>
Meeting ID: 845 2848 3874
Passcode: 909096

A 30-day public comment period will begin on Thursday, April 6, 2023. All residents are encouraged to submit written comments or questions by 5:00 pm, on Monday, May 8, 2023 to Corina Marin, City of Boulder Grants Administrator, at P.O. Box 791, Boulder, Colorado 80306, (303) 441-4134 or marinc@bouldercolorado.gov. Copies of the Action Plan will be made available upon request and are free of charge. Upon request, this document will also be made available to non-English speaking and persons with disabilities upon request. Per federal requirements, the public will have 30 days in which to comment on the report before it is submitted HUD. All comments received will be responded to in writing and will be included in the submission to HUD.

Notice of Non-Discrimination

The City of Boulder, Department of Housing and Human Services does not discriminate on the basis of race, color, religion, gender, age, national origin, disability, marital status, familial status, sexual orientation or military status in any of its programs, services or activities.

ADA & Section 504 Non-Discrimination Notice

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA") and Section 504 of the Rehabilitation Act of 1973, the Department of Housing and Human Services will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs or activities.

Published: Boulder Daily Camera April 6, 2023-1967740

Prairie Mountain Media, LLC

PUBLISHER'S AFFIDAVIT

County of Boulder
State of Colorado

The undersigned, Agent, being first duly sworn under oath, states and affirms as follows:

1. He/she is the legal Advertising Reviewer of Prairie Mountain Media LLC, publisher of the Daily Camera.
2. The Daily Camera is a newspaper of general circulation that has been published continuously and without interruption for at least fifty-two weeks in Boulder County and meets the legal requisites for a legal newspaper under Colo. Rev. Stat. 24-70-103.
3. The notice that is attached hereto is a true copy, published in the Daily Camera in Boulder County on the following date(s):

Apr 6, 2023

Melissa Nayera
Signature

Subscribed and sworn to me before me this

6th day of April 2023

Shayla Najera
Notary Public

(SEAL)

SHAYLA NAJERA
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20174031965
MY COMMISSION EXPIRES July 31, 2025

Account: 1052017
Ad Number: 1967740
Fee: \$77.44

Summary of 2023 Annual Action Plan Public Comments

2023 Annual Action Plan – Summary of Public Hearing Comments

Aaron Stoddard – Objects to use of \$4M for project. Design will not work. Location will not work. Will not add net increase of homes. No description of building beyond building use after 10 years.

Staff response: City disagrees with this comment. Per our review, analysis, and data, the design and location will work. The City conducted an environmental review for pre-development type activities prior to the factory design and engineering. It is the opinion of the City that this proposed facility will produce much needed affordable housing at lower cost and higher quality, and help to address the affordable housing challenges in our community. The 10-year lease is due to a state law restricting the length of district leases. There is a provision in the IGA to allow additional 10-year leases.

Alex Cassidy –The environmental review is incomplete and inaccurate. Factory construction and factory operations traffic should be included to understand impacts on nearby open space and nearby mobile home park. HUD funds should be revoked until a new EA is completed and compliance with all EA procedural requirements, including public notification, alternative site study, traffic study including BVSD campus study, impacts to factory construction traffic, acoustic study, anticipated increase in air and noise pollution, noise and emissions pollution evaluation including existing ozone and truck emissions standards.

Staff response: City disagrees with this comment. An updated environmental assessment (EA) has been completed and a second public notice was published, which invited the public to comment for a period of 30-days. The updated EA included additional consultation and analysis and provided sufficient consideration of environmental impacts. The EA provided sufficient explanation regarding alternative sites that were considered. A noise study was conducted at the request of the neighbors. Quiet hours and noise levels will be observed at the Factory in consideration of neighbors and nearby open space in accordance with city/county regulations. The Intergovernmental Agreement (IGA) terms in paragraph H: The Parties will ensure that deliveries to and from the Factory, including materials and supply deliveries and deliveries of completed modular housing units off site, will only occur on 65th Street during times when traffic impacts on BVSD operations and related safety risks for students, employees, parents, and other members of the public using that access are low. Deliveries to and from the Factory via 63rd Street will be minimized to the greatest extent possible. The Parties will work together in good faith to establish a delivery schedule to and from the Factory via 65th Street that minimizes traffic impacts on other BVSD operations. After the adoption of the IGA, BVSD has agreed that all construction traffic will occur on 65th Street during the summer when BVSD is closed to students. In the fall, construction traffic will follow the same requirements as Factory deliveries. No construction will occur on open space. Letters from consulting parties and studies conducted as part of the EA are the basis for stating the project will have no impacts to open space.

Alvin Schurman – Opposed to the Section 108 loan to construct the modular home factory. Many of the statements in the original Environmental Assessment (or EA) included in the loan application appear invalid. Loan money must not be applied to factory construction until EA

2023 Annual Action Plan – Summary of Public Hearing Comments

findings are re-evaluated, corrections made and the public comment period for findings is posted and re-opened.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Becky Morley – Opposed to the HUD loan to construct the modular home factory due to impacts such as noise and light pollution, impacts to the marsh on 63rd, nearby wildlife, zoning, and errors in the environmental assessment. Advance notice by BVSD and the city regarding project.

Staff response: City disagrees with this comment per reasons discussed above. In addition, ERO Resources Corporation (ERO) assessed the project area for potential wetlands and other waters of the U.S. threatened and endangered species habitat and general wildlife use. Per the report from ERO, if any work is planned in the ditches, their associated wetlands or the isolated wetlands in the project area, a jurisdictional determination should be requested from the U.S. Army Corps of Engineers. Although there is no work planned in the specified areas, the City did request a jurisdictional determination from the U.S. Army Corps of Engineers which is attached to the Environmental Assessment. City staff finds the application for initial zoning of Public (P) is consistent with the land use designation of Public/ Semi-Public (PUB) on the BVCP land use map and is compatible with surrounding properties per the Intergovernmental Annexation Agreement for the BVSD campus. Attached statement provided is on file.

Bill Plats –Opposed to the modular production factory project due to inaccurate environmental assessment. Negative impacts include nearby sombrero marsh, wildlife habitat, sound pollution, increased traffic/noise, chemical fumes and impacts to open space and Native American land.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Charles Hardesty – Objects to HUD loan to build the modular home factory. Will increase traffic, noise, negatively impact wildlife and the nearby marsh. Issues with zoning. Consider possible alternate sites.

Staff response: City disagrees with this comment per reasons discussed above. City staff finds the application for initial zoning of Public (P) is consistent with the land use designation of Public/ Semi-Public (PUB) on the BVCP land use map and is compatible with surrounding properties per the Intergovernmental Annexation Agreement for the BVSD campus. Attached statement provided is on file. Alternative sites were considered. Attached statement provided is on file.

Cindy Warren – Objects to release of HUD funds for the modular production factory. Irregularities with the environmental assessment and FONSI. Will negatively impact Sombrero marsh, wildlife, wetlands, open space and overall environment.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Clay Thompson – Opposed to the use of Section 108 HUD loan for the construction of the modular production factory. The original EA included in the loan application appear invalid.

2023 Annual Action Plan – Summary of Public Hearing Comments

Loan money must not be applied to factory construction until the EA findings are re-evaluated, corrections made and the public comment period for findings is posted and reopened. Additionally, the modular home factory is not part of the Boulder Master Plan. The area is zoned public. It is not zoned industrial.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Dan & Amy Hoskins – Opposed to the use of Section 108 loan for the construction of the modular production factory. Will negatively impact nearby marsh, wetlands, neighboring residents, air pollution, traffic impacts/noise, acoustics/noise pollution, and open space. Found errors in the EA; new one must be completed.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

David Hsu – Project violates public zoning and citizen participation was not followed. The EA assessment included in the loan application was invalid. EA findings need to be reevaluated with another opportunity for public comment.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Dennis Spano – Objects to use of federal funds allocated for the modular production factory at the proposed site. Included an Open Space Board of Trustees (OSBT) draft letter to city council regarding assessment over proposed annexation agreement stated natural and financial impacts to the Sombrero Marsh open space, and sited concerns over building siting and access to the site. Draft was never adopted.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Donna George – Problems with the EA and FONSI. Site for factory is close to wetlands (sombrero marsh, east boulder ditch and enterprise ditch). Ecological impacts were not considered that will impact Sombrero Marsh, wildlife, wetlands and endangered species. Fish and wildlife consultation error discovered. No Fish & Wildlife, or Army Corps of Engineers was completed prior to RROF. Noise issues from construction traffic and factory production will impact surrounding wildlife and neighborhoods.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

H. Cassidy – Opposed to Section 108 loan for the construction of the modular production factory. Found errors with the EA. Need to address traffic study, acoustic study, air pollution, impacts to wildlife, endangered species, Sombrero Marsh and other environmental impacts of construction. HUD funds should be withheld until a new EA has been completed and in compliance.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

2023 Annual Action Plan – Summary of Public Hearing Comments

JC Oliverio – Stated concerns that include impacts on Sombrero Marsh, heavy truck traffic, no sound/acoustic study, and alternate sites were not considered.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Joe Prizzio – City compromised the loan application and is asking for application to be voided due to procedural deficiencies. Process should begin anew. Citizen participation was not followed. Found flyers about the project, but no opportunity for public comment on the modular production factory. Hearings for the ConPlan do not include the factory project. 2020 Action Plan mentioned the project but didn't list a physical address for the project. Comment period didn't include provision for a public hearing. The city didn't notify the community (in writing) regarding the project site.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Kate Myers – Suggested using land for other purposes, such as pollinator garden. Stated concerns regarding environmental impacts to Sombrero Marsh, completion of a traffic study, number of students anticipated to use the facility and expected tax revenue from factory.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Kerry Landsman – Opposed to the use of Section 108 loan for the construction of the modular production factory. Will negatively impact nearby marsh, wetlands, neighboring residents, air pollution, traffic impacts/noise, acoustics/noise pollution, and open space. Found errors in the EA; new one must be completed.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Marc Rosenberg – Objects to modular production factory. Found issues with the EA and FONSI, city and county zoning laws, environmental impacts, impacts to Sombrero Marsh, traffic concerns, heavy truck traffic. Project will not produce a net increase in the number of low-income housing units.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Michael Phelps – Opposed to the use of Section 108 loan for the construction of the modular production factory. Will negatively impact nearby marsh, wetlands, neighboring residents, air pollution, traffic impacts/noise, acoustics/noise pollution, and open space. Found errors in the EA; new one must be completed.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Rona Cantor – Objects to the use of the Section 108 loan for the construction of the modular production factory. Objects to using the educational component as the work will be done by Habitat volunteers and/or paid employees. Concerned about noise.

2023 Annual Action Plan – Summary of Public Hearing Comments

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Seth Waldman – Opposed to the use of Section 108 loan for the construction of the modular production factory. Will negatively impact nearby marsh, wetlands, neighboring residents, air pollution, traffic impacts/noise, acoustics/noise pollution, and open space. Found errors in the EA; new one must be completed.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Stacy Stoutenberg – Worried about Sombrero Marsh. It is bone dry at this time. I have lived here 22 years and it does not support the factory as it will negatively impact the marsh.

Staff response: City disagrees with this comment per reasons discussed above. Attached statement provided is on file.

Steve Liedtke – Opposed to project. City violated many policies and has not followed procedures. Lives on opposite side of marsh, which is currently dry. This project will dramatically impact wildlife.

Staff response: City disagrees with this comment per reasons discussed above.

Tina Fields – Opposed to the modular production factory. A new EA needs to address concerns to nearby Sombrero Marsh, wetlands, open space, zoning, traffic pollution, heavy truck traffic, site location, and social justice concerns to nearby Columbine mobile home park.

Staff response: City disagrees with this comment per reasons discussed above. In addition, it is the City's opinion that updated hours of operation and utilizing 65th Street will mitigate the potential negative traffic impacts on residents of Columbine Mobile Home Park. Attached statement provided is on file.

This information is considered a public record and may be released upon request.

①

PUBLIC HEARING SPEAKER REGISTRATION

MEETING DATE: 4/24/23
AGENDA ITEM: 2023 Action Plan
PARTICIPANT NAME: Bill Platts
MAILING ADDRESS: 1288 Meadowlark Dr Boulder
80303
PHONE (Optional): 303 517 6385
COMMENTS: Modular Home Factory location

From Dennis Spano

⑤

This information is considered a public record and may be released upon request.

③

PUBLIC HEARING SPEAKER REGISTRATION

MEETING DATE: 4/24/23
AGENDA ITEM: MODULAR HOME LOCATION
PARTICIPANT NAME: DENNIS SPANO
MAILING ADDRESS: 1467 MEADOWLARK DR BOULDER CO 80303
PHONE (Optional): 303-931-6046
COMMENTS: _____

This information is considered a public record and may be released upon request.

④

PUBLIC HEARING SPEAKER REGISTRATION

MEETING DATE: April 24, 2023
AGENDA ITEM: CDBG - modular home factory
PARTICIPANT NAME: MARC ROSENBERG
MAILING ADDRESS: 6213 Reserve Drive
PHONE (Optional): 703-356-5766
COMMENTS: Opposed to this project.

(6)

PUBLIC HEARING SPEAKER REGISTRATION

MEETING DATE: 4/24/2024
AGENDA ITEM: 6500 DRAKHOO ANNEXATION
PARTICIPANT NAME: ALEX CASSIDY
MAILING ADDRESS: 1434 MEADOWLARK DRIVE BOULDER CO 80303
PHONE (Optional): 720-232-6166
COMMENTS: _____

(7)

PUBLIC HEARING SPEAKER REGISTRATION

MEETING DATE: 4/24/23
AGENDA ITEM: Modular Housing Factory
PARTICIPANT NAME: Cindy Warren & Leann Roberts
MAILING ADDRESS: 1320 Swallow Ct & 6326 Swallow Lane
PHONE (Optional): _____
COMMENTS: opposed to factory

(75)

Anne Ish Tay

(8)

PUBLIC HEARING SPEAKER REGISTRATION

MEETING DATE: 4/24/23
AGENDA ITEM: COBG loan for construction of a modular production factory
PARTICIPANT NAME: Donna George
MAILING ADDRESS: 4661 Tally Ho Court Boulder, CO 80301
PHONE (Optional): _____
COMMENTS: Distribution of funds need to be put on hold until alternate sites have been considered & a correct Environmental Assessment has been done

(75)

This information is considered a public record and may be released upon request.

(9)

PUBLIC HEARING SPEAKER REGISTRATION

MEETING DATE:

4/24/23

AGENDA ITEM:

Modular Housing Factory

PARTICIPANT NAME:

Stacy Stantenberg

MAILING ADDRESS:

1251 Pintail Circle

PHONE (Optional):

COMMENTS:

opposed to factory

This information is considered a public record and may be released upon request.

(10)

PUBLIC HEARING SPEAKER REGISTRATION

MEETING DATE:

4/24/23

AGENDA ITEM:

Comment Section 108 Loan, Mod. Factory

PARTICIPANT NAME:

Joseph PRIZIO in behalf of Edie Fagona &

MAILING ADDRESS:

1332 Swallow CT

Sunghee McInerdy

PHONE (Optional):

303.517.5289

COMMENTS:

plus 5

This information is considered a public record and may be released upon request.

(11)

PUBLIC HEARING SPEAKER REGISTRATION

MEETING DATE:

4/24

AGENDA ITEM:

6500 Arapaho

PARTICIPANT NAME:

Charles Hardesty + Charles Roberts

MAILING ADDRESS:

1411 Westview Dr Boulder

PHONE (Optional):

COMMENTS:

Opposed to factory

+5

This information is considered a public record and may be released upon request.

12

PUBLIC HEARING SPEAKER REGISTRATION

MEETING DATE: 4/24/2023

AGENDA ITEM:

PARTICIPANT NAME: Alvin and Heather Schurman

MAILING ADDRESS: 1242 Meadow Park Dr

PHONE (Optional):

COMMENTS: Heather is donating time to me. Thanks

+5

This information is considered a public record and may be released upon request.

13

PUBLIC HEARING SPEAKER REGISTRATION

MEETING DATE: 4/24/23

AGENDA ITEM: Sombrero Marsh

PARTICIPANT NAME: Anna Cantor

MAILING ADDRESS: 1411 Westview Dr, Bear 03

PHONE (Optional):

COMMENTS: Against 6500 to 7000

This information is considered a public record and may be released upon request.

14

PUBLIC HEARING SPEAKER REGISTRATION

MEETING DATE: 4-24-2023

AGENDA ITEM: HUD # For Manufacturing Factory at 6400 Asplawe

PARTICIPANT NAME: Aaron Stoddard

MAILING ADDRESS: 1180 Ravenwood Rd, Boulder, CO 80303

PHONE (Optional):

COMMENTS: Factory not appropriate at this location. will not work as designed. City's packets show misleading info that can't be held up one built. Should be built elsewhere, not shoehorned into this location.

This information is considered a public record and may be released upon request.

15

PUBLIC HEARING SPEAKER REGISTRATION

MEETING DATE: 4/24/23

AGENDA ITEM: HUD Loan @ 6500 Annapolis

PARTICIPANT NAME: Clay Thompson

MAILING ADDRESS: 2860 7th St. Boulder CO 80304

PHONE (Optional): (720) 841-6900

COMMENTS: See Attached. Completely Opposed.

SF424s and Certifications

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:**

02/27/2023

4. Applicant Identifier:

95-74500

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

B-23-MC-08-0003

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Boulder

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

84-6000566

*** c. UEI:**

P9Y8CAFT4GB5

d. Address:

*** Street1:**

PO BOX 791

Street2:

*** City:**

Boulder

County/Parish:

*** State:**

CO: Colorado

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

80306-0791

e. Organizational Unit:

Department Name:

Housing & Human Services

Division Name:

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

Prefix:

*** First Name:**

Eli

Middle Name:

*** Last Name:**

Urken

Suffix:

Title:

Housing Investment Senior Project Manager

Organizational Affiliation:

*** Telephone Number:**

303-441-4142

Fax Number:

*** Email:**

UrkenE@bouldercolorado.gov

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:

United States Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

Community Development Block Grant

* 12. Funding Opportunity Number:

N/A

* Title:

N/A

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:

Boulder to provide capital investments/improvements to community nonprofits, a microenterprise program & public service activities through Family Resource Schools, & repayment of Section 108 loan.

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 * b. Program/Project

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

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="817,489.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="817,489.00"/>

*** 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

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 18, 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: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:



* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

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.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager, City of Boulder, CO
APPLICANT ORGANIZATION City of Boulder	DATE SUBMITTED 4/11/2023

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:

02/27/2023

4. Applicant Identifier:

95-74500

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

M-23-DC-08-0202

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

City of Boulder

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

84-6000566

* c. UEI:

P9Y8CAFT4GB5

d. Address:

* Street1:

PO BOX 791

Street2:

* City:

Boulder

County/Parish:

* State:

CO: Colorado

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

80306-0791

e. Organizational Unit:

Department Name:

Housing & Human Services

Division Name:

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

Prefix:

* First Name:

Eli

Middle Name:

* Last Name:

Urken

Suffix:

Title:

Housing Investment Senior Project Manager

Organizational Affiliation:

* Telephone Number:

303-441-4142

Fax Number:

* Email:

UrkenE@bouldercolorado.gov

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:

United States Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships Program

* 12. Funding Opportunity Number:

N/A

* Title:

N/A

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:

To preserve and provide affordable housing opportunities in the City of Boulder, Boulder County, the City of Longmont and the City and County of Broomfield.

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 * b. Program/Project

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

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,201,920.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="1,201,920.00"/>

*** 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 18, 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: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

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.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager, City of Boulder, CO
APPLICANT ORGANIZATION City of Boulder	DATE SUBMITTED 4/11/2023

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.

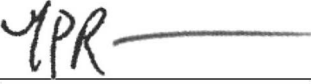
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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 75.



Signature of Authorized Official

4/11/2023

Date

City Manager

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 2022, 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.



Signature of Authorized Official

4/11/2023

Date

City Manager

Title

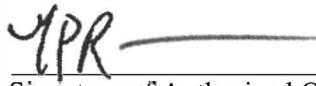
Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



Signature of Authorized Official

4/11/2023

Date

City Manager

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.