

# DRAFT 2021 CAPER

## CR-05 - Goals and Outcomes

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

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

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

In 2021, the City of Boulder outcomes included the completion of several activities benefiting from CDBG funds from prior years, committed and planned investment in activities using the FY2021 grant, and preparing to invest the CDBG-CV grants to meet continued and emerging needs related to the COVID-19 pandemic.

- **City of Boulder** activities benefiting from **prior CDBG grant** years included the completion (full expenditure) of the capital improvements benefiting SPAN (Safehouse Progressive Alliance for Nonviolence) the city's domestic violence shelter (IDIS 718), public service activities benefiting Family Resource Schools (IDIS 730), economic development activities through the Colorado Enterprise Fund Microenterprise Program (IDIS 731), and CDBG administrative funds (IDIS 721). CDBG activities still in progress and spending down prior year funds include the Housing Rehab Program (IDIS 725). 2021 outcomes from prior HOME grant years include completion of Tenant Based Rental Assistance administered by Broomfield (IDIS 727), Flatirons Habitat for Humanity Violet Ave (IDIS 688) and Boulder County Housing Authority's The Spoke on Coffman in Longmont (IDIS 728). Progress continued/s on several prior year HOME Funded projects including Flatirons Habitat for Humanity Violet Avenue (IDIS 734), Flatirons Habitat for Humanity Palo Park (IDIS 712) and continued support of Broomfield's TBRA program (IDIS 733).
- **City of Boulder FY2021 CDBG investments that occurred** in 2021 include continued support of the Family Resource Schools public services activity (IDIS 736), unit acquisition by the Boulder Shelter for the Homeless providing one unit of permanently supportive housing (IDIS 735), continued support of the Colorado Enterprise Fund Microenterprise Program (IDIS 737) and administrative funds supporting CDBG (IDIS 738) and CDBG-CV (IDIS 740) activities.

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- **City of Longmont** continued to focus will remain on homeownership preservation and construction, as well as new homebuyer opportunities via downpayment assistance and financial counseling. The City of Longmont will also focus on housing stabilization programs, community investments, and economic development via job creation and support for micro-enterprises and small businesses.
- **City and County of Broomfield** has successfully continued to use its HOME Funds to continue the Tenant Based Rental Assistance Program (TBRA) administered through the Health and Human Services Department.

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

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

Goal	Category	Source / Amount	Indicator	Unit of Measure	Expected – Strategic Plan	Actual – Strategic Plan	Percent Complete	Expected – Program Year	Actual – Program Year	Percent Complete
Administration	Administration	CDBG: \$ / HOME: \$ / Section 108: \$215850	Other	Other	0	0				
Community Investment Programs	Non-Housing Community Development	CDBG: \$ / CDBG-CV: \$463451	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	45	1079	2,397.78%	25	1079	4,316.00%
Community Investment Programs	Non-Housing Community Development	CDBG: \$ / CDBG-CV: \$463451	Other	Other	5	0	0.00%	1	0	0.00%

**Commented [CS1]:** Family Resource School

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Economic Development Programs	Economic Development	CDBG: \$	Businesses assisted	Businesses Assisted	50	72	144.00%	10	72	720.00%	<b>Commented [CS2]:</b> Microenterprise
Homeownership Programs	Affordable Housing	CDBG: \$ / HOME: \$ / Section 108: \$4000000	Homeowner Housing Added	Household Housing Unit	50	3	6.00%	9	3	33.33%	<b>Commented [CS3]:</b> Habitat Violet Ave
Homeownership Programs	Affordable Housing	CDBG: \$ / HOME: \$ / Section 108: \$4000000	Homeowner Housing Rehabilitated	Household Housing Unit	25	0	0.00%	5	0	0.00%	
Housing Stabilization Programs	Affordable Housing Homeless	CDBG: \$ / CDBG-CV: \$400000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0			0			
Housing Stabilization Programs	Affordable Housing Homeless	CDBG: \$ / CDBG-CV: \$400000	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	195		200	196	98.00%	<b>Commented [CS4]:</b> SPAN Rehab = 1 Boulder Shelter Acquisition = 195
Housing Stabilization Programs	Affordable Housing Homeless	CDBG: \$ / CDBG-CV: \$400000	Other	Other	420	1	0.24%				

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Rental Housing Programs	Affordable Housing	CDBG: \$ / HOME: \$	Rental units constructed	Household Housing Unit	0	9		60	9	15.00%	<b>Commented [CS5]:</b> BCHA The Spoke on Coffman
Rental Housing Programs	Affordable Housing	CDBG: \$ / HOME: \$	Rental units rehabilitated	Household Housing Unit	250	0	0.00%				
Rental Housing Programs	Affordable Housing	CDBG: \$ / HOME: \$	Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	6		10	6	60.00%	<b>Commented [CS6]:</b> Broomfield TBRA

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

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

The City of Boulder has successfully focused its use of federal fund, particularly CDBG, to meet the priorities and objectives in the Consolidated Plan and 2021 Action Plan. The City and its community partners believe the programs identified continue to be the best use of the HUD funds.

## **Rental and Housing Stabilization (Priority 1 and 2)**

- **Boulder Shelter for the Homeless/Permanently Supportive Housing (735)** - The City of Boulder invested CDBG funds in 2021 supporting the Boulder Shelter for the Homeless acquisition of a single unit to add to their portfolio and serve homeless individuals who have backgrounds that make them hard-to-house in traditional units.

## **Community Investment (Priority 3)**

- **SPAN Capital Improvements (718)** – In 2021 capital improvements were completed at the residential facility owned and managed by SPAN (Safehouse Progressive Alliance for Nonviolence) the city's domestic violence shelter. CDBG funds were used to complete improvements to residential property providing safe haven to women and families having experiences domestic violence. Improvements focused on health, safety and livability of the property.
- **Family Resource School (730 and 736)**- CDBG funds were granted to the Family Resource School Program (FRS). FRS is a joint partnership between the City of Boulder and the Boulder Valley School District serving children and families at five elementary schools in Boulder: Columbine, Creekside, Crest View, University Hill and Whittier International. FRS is dedicated to supporting families capacity to raise healthy, well-functioning, and successful children through a broad array of prevention and early intervention services. These services are developed and delivered according to the unique needs of families in each school community. The program especially emphasizes outreach to traditionally underserved populations to increase access to basic services and engagement in school.

## **Homeownership (Priority 4)**

- **Minor Home Repair Program (725)** – The Housing Rehab Program (owner-occupied home repair program) is facilitated by the City of Longmont and serves the City of Boulder and the City of Longmont. The program is designed to help income qualified homeowners fix problems in their homes such as roofing, plumbing, heating, electrical, etc. Up to \$25,000 in assistance is provided in the form of a deferred or low-interest loan, and is prioritized to eliminate health and safety issues, correct code violations, make the home more

**Commented [CS7]:** 2016 Habitat Violet - completed construction on 3 units.

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energy-efficient, and undertake cosmetic improvements.

- **Habitat Violet Ave (688)** – HOME funds were granted to Flatirons Habitat for Humanity for pre-development associated with development of three home ownership units.

### **Economic Development (Priority 5)**

- **Microenterprise, Colorado Enterprise Fund, Inc (731 and 737)** - The City of Boulder invested CDBG funds to cover the administrative costs of their microloan program in Boulder. This program includes the creation of economic opportunities for low- to moderate income people who own and operate small businesses in Boulder. Program services provided by Colorado Enterprise Fund, Inc. include business training, counseling and technical assistance, loan monitoring and servicing, and Boulder program marketing and outreach.

### **Administration (Priority 6)**

- CDBG funds were set aside to support the administration of the CDBG program.

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### CR-10 - Racial and Ethnic composition of families assisted

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

	CDBG	HOME
White	0	17
Black or African American	26	0
Asian	35	0
American Indian or American Native	8	0
Native Hawaiian or Other Pacific Islander	25	0
<b>Total</b>	<b>94</b>	<b>17</b>
Hispanic	974	1
Not Hispanic	276	16

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

#### Narrative

Populations served by Boulder funds as shown in the table above, include families and persons served and are representative of the population mix of the city. Current demographics for the population of the city of Boulder - White 87.7% / Asian 5.8% / Other Race & Ethnicity, including Hispanic 1.51%.

### CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	1,451,389	
HOME	public - federal	1,736,305	
Section 108	public - federal		
Other	public - federal	1,079,301	

**Table 3 - Resources Made Available**

#### Narrative

In 2021, between prior year commitments and FY21 commitments, CDBG funds were expended to support rental housing and stabilization (\$300,000), public services (\$74,615.16), homeownership (\$23,994.66), economic development (\$50,000), and administration (\$219,678.84)

In 2021, between prior year commitments and FY21 commitments, HOME funds were expended to support rental housing and stabilization (TBRA) (\$64,601.57), homeownership (\$375,444.53), and administration (\$54,640.94)

In 2021, City of Boulder staff engaged HUD regarding the use of a Section 108 loan to support the construction of a modular housing production facility. Conversations continue into 2022, with the loan closing scheduled for mid-2022. Not funds were expended using this source.

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The other source of funds category includes the CDBG – CV funds. In 2020, due to the COVID – 19 pandemic HUD provided the City of Boulder with additional funds to support the City’s preparation, response to, and prevention of COVID – 19. Through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) the City of Boulder was awarded \$1,079,301 in CDBG – CV funds. CDBG – CV funds are multi-year grants and offer some flexibility in terms of timing of their spend down. The City has strategically held these funds to time their expenditure to align with other funding timing requirements and to expend to meet the continued and emerging needs related to the pandemic.

### Identify the geographic distribution and location of investments

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

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

### Narrative

Prior to 2015, HOME funds received by the HOME Consortium were distributed to the Consortium members based on a set percentage (City of Boulder – 50%, City of Longmont – 23%, Boulder County – 20%, City and County of Broomfield – 7%). The City of Longmont oversees its own distribution of HOME funds. City and County of Broomfield has used its funds to support a Tenant Based Rental Program. The City of Boulder oversees distribution of its HOME funds as well as the funds designated for Boulder County. In 2015, the HOME Consortium members transitioned to employing a rotational distribution of funding 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 of 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 purpose of this adjustment is threefold: 1) Concentrate HOME resources to simplify and expedite individual affordable housing projects; 2) Reduce the administrative burden of managing multiple HOME projects across the region; 3) Support the Ten-year Plan to Address Homelessness by supporting a regional approach to provide transitional and permanent housing to individuals experiencing homelessness.

All CDBG funding allocated to the City of Boulder is allocated to support activities within the Boulder city limits. CDBG funds are prioritized to meet the housing needs of low and moderate income households, the capital improvement needs of service providers, and public services that target low- and moderate-income residents. The geographic location of the programs is dependent upon the request for funds, as the City’s program is historically driven by an annual competitive application process. However, with the pressures of pandemic and limited staff capacity the competitive application process was modified for a mixed approach which included limited application process, solicitation of applications from qualified organizations and an open door unsolicited application process during COVID-19.

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## Leveraging

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

All Participating Jurisdictions (PJs) must contribute or match no less than 25 cents for each dollar of HOME funds spent on affordable housing. As PJs draw funds from HOME Investment Trust Funds, they incur a match liability, which must be satisfied by the end of each federal fiscal year.

The City of Boulder met match liability requirements via funding expenditures from the city affordable housing fund, a local funding source, for affordable housing projects. Per the HOME waiver issued for Match Liability requirements, the City has no Match Liability for 2021. Nonetheless, the carry-over from the previous year was enough to cover the Match Liability requirement amount that would have been incurred in 2021.

<b>Fiscal Year Summary – HOME Match</b>	
1. Excess match from prior Federal fiscal year	0
2. Match contributed during current Federal fiscal year	0
3. Total match available for current Federal fiscal year (Line 1 plus Line 2)	0
4. Match liability for current Federal fiscal year	0
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4)	0

**Table 5 – Fiscal Year Summary - HOME Match Report**

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

Table 6 – Match Contribution for the Federal Fiscal Year

### HOME MBE/WBE report

Program Income – Enter the program amounts for the reporting period				
Balance on hand at beginning of reporting period \$	Amount received during reporting period \$	Total amount expended during reporting period \$	Amount expended for TBRA \$	Balance on hand at end of reporting period \$
0	27,209	27,209	0	0

Table 7 – Program Income

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<b>Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period</b>						
	Total	Minority Business Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
<b>Contracts</b>						
Dollar Amount	0	0	0	0	0	0
Number	0	0	0	0	0	0
<b>Sub-Contracts</b>						
Number	86	0	0	0	5	81
Dollar Amount	45,085,047	0	0	0	1,601,602	43,483,445
	<b>Total</b>	<b>Women Business Enterprises</b>	<b>Male</b>			
<b>Contracts</b>						
Dollar Amount	0	0	0			
Number	0	0	0			
<b>Sub-Contracts</b>						
Number	7	7	0			
Dollar Amount	6,305,399	6,305,399	0			

**Table 8 - Minority Business and Women Business Enterprises**

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

**Table 9 – Minority Owners of Rental Property**

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<b>Relocation and Real Property Acquisition</b> – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition						
Parcels Acquired		1		300,000		
Businesses Displaced		0		0		
Nonprofit Organizations Displaced		0		0		
Households Temporarily Relocated, not Displaced		0		0		
Households Displaced	Total	Minority Property Enterprises				White Non-Hispanic
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non-Hispanic	Hispanic	
Number	0	0	0	0	0	0
Cost	0	0	0	0	0	0

**Table 10 – Relocation and Real Property Acquisition**

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### CR-20 - Affordable Housing 91.520(b)

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

	One-Year Goal	Actual
Number of Homeless households to be provided affordable housing units	10	196
Number of Non-Homeless households to be provided affordable housing units	60	12
Number of Special-Needs households to be provided affordable housing units	0	0
<b>Total</b>	<b>70</b>	<b>208</b>

**Table 11 – Number of Households**

	One-Year Goal	Actual
Number of households supported through Rental Assistance	0	6
Number of households supported through The Production of New Units	60	12
Number of households supported through Rehab of Existing Units	0	195
Number of households supported through Acquisition of Existing Units	0	1
<b>Total</b>	<b>60</b>	<b>214</b>

**Table 12 – Number of Households Supported**

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

For the City of Boulder, the number of households supported through Rental Assistance was less than expected simply because other sources of federal funding were created with specific RA focus and with more aggressive spending deadlines. Because these funds were not deployed as anticipated, the numbers served did not reach the expected levels. The number of homeless households provided housing units exceeded the one-year goal. This was accomplished through the rehabilitation of Safehouse Progressive Alliance for Nonviolence and the acquisition of one permanently supportive housing units through Boulder Shelter for the Homeless.

**Discuss how these outcomes will impact future annual action plans.**

Although we are currently working on compiling the 2021 Action Plan, we expect that it will include a reduction in the amount of funding allocated to the Rental Assistance activity. We expect to re-allocate the funds to other needs that have been identified without an explicit funding source available.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	313	6
Low-income	14	1
Moderate-income	15	2
<b>Total</b>	<b>342</b>	<b>9</b>

**Table 13 – Number of Households Served**

### **Narrative Information**

**CDBG:** Family Resource School services families from income levels ranging from extremely low to the non-low moderate income levels. For FY 2020, there were 311 households served which was a decrease from the 768 households served in FY 2019. This decline was a direct result of COVID-19. Not included in the chart above is the income category for “Non Low Moderate”, whereby the program served an additional families bringing the total for all income levels served to 1,491.

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

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**CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)**  
**Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:**

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

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

- Providing space at a city-owned property for the provision of CE services
- Implementation of the BThERe outreach program
- Participation in countywide coordinated outreach programming, including efforts to target vaccinations to the unhoused
- Improved coordination between municipal court homeless navigators, Police department, Parks, nonprofits and housing staff to ensure adequate encampment outreach

Longmont: The City continued to participate in the Annual Point in Time Count. Also, the City continued to fund the OUR Center to continue to provide intake, assessment and basic needs for people experiencing [EV1] [CS2] [CS3] [EV4] and those at risk of homelessness and HOPE for Longmont, which provides street outreach, navigation services, and sheltering. Furthermore, the City is working with the Boulder Shelter for the Homeless (BSH) to deliver housing focused outreach, diversion services, and assessment.

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

Emergency Sheltering for adults in Boulder County is provided at Boulder Shelter for the Homeless (BSH - up 160 beds) and HOPE for Longmont (up to 48 beds). Sheltering is provided to victims of domestic violence through SPAN and Safehouse. Youth sheltering occurs at TGTHR. Between 1/1-12/31/2021:

- BSH provided 39,205 bed nights of service through program-based(82%) and standby beds (18%)
- BSH provided 3,481 bed nights of non-congregate sheltering for high-risk vulnerable shelter residents
- The COVID Recovery Center provided 1,386 bed nights of respite/recovery beds to unhoused adult individuals
- BSH and the State partnered to provide regular vaccination for shelter residents
- Shelter eligibility criteria were changed to allow for more placements, and case management was changed to reflect a more individually tailored approach in lieu of participation within specific service offerings

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- Inclement weather sheltering continues to be a focus in winter months
- HSBC established a Lived experience workgroup to provide input on policy decisions
- Boulder Municipal Court implemented a short-term transitional housing program for high justice-system utilizers to move seamlessly into PSH

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

Boulder County has significant prevention services and subsidies for housing stabilization. Its 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. The county funds 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[EV1] [CS2] [AC3] 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
- Rental assistance for tenants facing a potential eviction

### **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)

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**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**

Boulder is a lead entity within Homeless Solutions for Boulder County (HSBC). Under that umbrella:

- Established a Move-Up, Move on Strategy for Emergency Housing Voucher use, freeing Permanent Supportive Housing (PSH) units and associated case management services for more vulnerable persons
- Increased the number of VASH vouchers available in the community
- Leveraged locally funded vouchers with COC, state, and other federal resources to increase options for PSH
- Provided gap financing and support for PSH units as a percentage of all affordable housing development
- Used CBDG to fund the acquisition of a unit to house a registered sex offender (who was otherwise unable to lease through traditional PSH voucher programs). Plans are to extend this program by 9 units in the next year.
- Explored the development of two residential recovery homes for people with meth addictions. Property acquisition to occur in 2022
- Developed countywide PSH case management standards
- Conducted information gathering for potential ARPA-funded housing retention and peer support program
- Conducted COC and local case conferencing to match appropriate voucher to appropriate needs through coordinated, by-name prioritization
- Provided rental assistance for Ready to Work program graduates
- Continued progress and evaluation of the Housing Exits Workgroup Strategic Plan
- Established a flexible fund to secure units for PSH voucher holders and hired a landlord relations/property search professional for PSH efforts

The City has a comprehensive housing strategy under development that includes a commitment to affordable housing for low-income individuals and families.

The City of Boulder is also a lead partner in coordinating local efforts around development of a Coordinated Assessment and Housing Placement System (CAHPS) through the Metro Denver 25 Cities Initiative pilot project. This assesses individuals for housing needs based on a standardized evaluation of vulnerability and other characteristics, and matches them with housing resources available throughout the region.

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

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

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

### **Actions taken to address the needs of public housing**

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

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

BHP Public Housing Example and Property Updates:

- **Arapahoe Court** continued to be in the BHP Public Housing portfolio for at least the next three to five years. In 2021, BHP installed a WiFi system available at no charge for residents and enhanced the site's safety by installing security cameras. BHP replaced stairs and landings at the 953 building and installed a public art mural in 2020. BHP will continue to manage the property in a manner that is safe and viable in the Public Housing program for the foreseeable future.

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

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

### **Actions taken to provide assistance to troubled PHAs**

No action was taken in 2021 to provide assistance to troubled PHAs as there was no need identified for such action.

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

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

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

Since the development of the last Plan, conducted in 2020-2024, the Consortium has strengthened its coordination and cooperation throughout Boulder County with creation of a Regional Strategic Housing Plan and, for Broomfield, a housing market analysis and strategy. The Regional Plan, developed by the Regional Strategic Housing Partnership made up of Boulder County, City of Boulder and City of Longmont, has set forth a goal of increasing the number of affordable homes countywide to reach 12 percent of its housing stock be made permanently affordable by 2035.

During 2021 several jurisdictions in the county, Erie, Superior, Louisville, adopted inclusionary housing ordinances requiring residential development contribute the creation of affordable housing through unit production or cash-in-lieu payments.

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

The Consortium member jurisdictions continue to partner with the State in the coordination of funding opportunities ensuring the leveraging of state, local and private investment funding to support housing and community development efforts. All Consortium members participate in the Metro Denver Homeless Initiative (MDHI), which facilitates, integrates, and tracks cooperative, community-wide and regional systems of care for people who have become homeless, to help them become stable, and work toward self-sufficiency.

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

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

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

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

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

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

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

In 2021 City of Boulder implemented the community initiated and voter approved Eviction Prevention and Rental Assistance Program. Passage of a city ordinance created a rental licensing tax to fund programming providing legal services and rental assistance to persons at risk of eviction.

Each year, the City of Boulder also provides rebates to help compensate residents with lower incomes for the city sales tax they pay on food. Those seeking a rebate must fill out an application documenting their eligibility. In 2020, rebates were \$87 for individuals and \$265 for families. City residents who do not have permanent shelter are eligible for the refund and can meet the residency requirement by providing documentation that they are receiving services from a city recognized homelessness services agency.

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

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

The City of Boulder Department of Housing and Human Services will continue to administer the CDBG program. Activity selection and funding decisions will continue to be made in close coordination with

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the City's Human Services and Health Equity funds and the Community Vitality program. These decisions will continue to be influenced by the expertise of two Advisory Boards, appointed by the City Manager. The City will also continue its regular coordination meetings with housing and service providers.

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

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

#### **Notable collaborations include:**

**Boulder County Human Services Master Plan** – All governments in the County and the Foothills United Way are joining to provide a common approach to defining, assisting and funding human service agencies. Its specific purpose is to enhance coordination and work to eliminate gaps in services while avoiding duplication of services. <http://themarysandoehouse.com/V>

**Boulder County Homeless Plan Initiative** – This collaborative served the same purpose as LHOT, but worked on a Ten Year Plan to Eliminate Homelessness in all of Boulder County. An Advisory Board was seated in late 2011 and met quarterly during 2019 to help move the County Plan implementation forward.

**Boulder County Regional Housing Partnership:** The city of Boulder is one of the lead agencies to initiate and lead the Regional Housing Partnership. All 11 Boulder jurisdictions have passed resolutions to support the work of the Regional Housing Partnership and work towards the 12% permanently affordable housing goal – secure 12% of all residential properties in the county as permanently affordable by 2035. Collective work focuses on creation and preserving housing opportunities, programmatic and regulatory efficiencies and alignment, and increasing financial resources.

**Boulder Broomfield Regional Consortium** – Works to identify and address common housing needs, overcome gaps in affordable housing provision and increase the amount of HOME funding coming to our local region.

The City has been and will continue to work closely and effectively with Boulder Housing Partners and nonprofit housing providers. The City will continue its close coordination while nurturing relationships with for-profit developers able to help meet the affordable housing needs of residents. The City 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. Furthermore, the City will

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continue to work closely with the Human Services Fund to ensure service providers' access to the service dollars available.

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

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

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

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

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### **CR-40 - Monitoring 91.220 and 91.230**

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

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

Typically, additional monitoring is conducted if findings in the initial monitoring deem it necessary. As a condition of 2020, HUD provided waivers and flexibilities to grantees that supported grantees in navigating the COVID – 19 pandemic. Flexibilities were provided in a variety of categories including within each of the HUD funding programs, citizen participation requirements, environmental reviews, and home quality inspections. Due to COVID-19, all HOME-assisted rental housing properties and CDBG funded projects were monitored remotely. On-site housing quality standard unit inspections were suspended as referenced in the HOME Waiver.

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

In 2021 a total of 32 projects were monitored remotely which included 7 HOME-assisted properties and 2 CDBG projects none of which resulted in concerns or findings. Units were not inspected due to the COVID-19 process changes[CS1] .

In addition to the City's monitoring of City funded programs and projects, the City also monitors HOME Consortium members to ensure the projects they fund are in compliance with applicable rules.

City of Longmont staff conducted monitoring on projects under contract in its own jurisdiction. Monitoring included but was not limited to:

- Documenting HOME compliance with requirements for conducting subrecipient monitoring.
- Assuring that funded projects comply with established regulations and that project activities continue to serve the target population identified in the initial application.
- Assuring HOME recipients are complying with applicable federal regulations.

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- Assuring compliance with the Federal Office of Management and Budget (OMB) Circulars and local regulations relating to financial management systems, procurement and contracting, labor standards, record keeping, and reporting requirements.

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

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

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

A Public Notice was published on February 27, 2022 to invite the public to a Virtual Public Hearing was held on March 16, 2022.

The 2021 Draft CAPER and Citizen Participation Plan was also made available on Sunday, February 27, 2022 for public review on the City of Boulder website at: <https://bouldercolorado.gov/services/affordable-housing-grants>. In addition, a reasonable number of printed copies will be available upon request, free of charge.

Pursuant to the Boulder Broomfield Regional Consortium Citizen Participation Plan, this CAPER allowed for reasonable notice for accessibility, review, and comment, as well as a comment period prior to submission of 30 days. The public was given thirty (30) days to comment on the CAPER. As of March 29, 2022 the Consortium received no Comments.

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### **CR-45 - CDBG 91.520(c)**

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

The City of Boulder met the 2021 timeliness test. The pandemic resulted in local budget reductions continuing to impact city staffing levels, including in the Community Investment Team. While the constraints have required shifts in work assignments and increased workload, support in the form of programmatic and regulatory waivers from HUD supported the ability to meet regulatory requirements and implementation of HUD program true to the intention of the HUD programming and local priorities and objectives.

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

No

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

No

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### **CR-50 - HOME 91.520(d)**

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

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

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

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

Projects Scheduled for Monitoring in 2021:

- 2301 Goss
- Alvarado Village
- Attention Homes – Broadway
- Attention Homes Residences
- Boulder County Personal Finance Program
- BHP Canopy at Red Oak Park
- BHP Casey
- BHP Cedar
- BHP Ciclo
- BHP Dakota Ridge
- BHP Hayden Place
- BHP High Mar
- BHP Lee Hill
- BHP Midtown
- BHP Palo Park
- BHP Red Oak Park
- BHP Sanitas Place

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- BHP Tantra Lakes
- BHP Trout Farms
- BHP Twenty37
- BHP Twin Pines
- BHP Whittier
- Bridge House RTW
- Broomfield TBRA
- EFAA Echo House
- EFAA North Boulder Transitional Housing
- Depot Square
- Element Osage
- Element The Nest
- Element Thunderbird
- Family Resource School
- Golden West Manor
- Longmont Imagine
- Longmont Fall River
- Longmont Thistle Cannery
- Mary Sandoe House
- Safehouse Progressive Alliance for Nonviolence
- The View on 26<sup>th</sup> St
- Thistle Ledges
- Thistle Lumine
- Thistle Mapleton MHP
- Thistle Pinewood
- Thistle Spruce St

### Projects monitored in 2021:

- Attention Homes Residences
- BHP Canopy at Red Oak Park
- BHP Casey
- BHP Cedar
- BHP Ciclo
- BHP Dakota Ridge
- BHP Hayden Place
- BHP High Mar
- BHP Lee Hill
- BHP Midtown
- BHP Palo Park
- BHP Red Oak Park
- BHP Sanitas Place
- BHP Tantra Lakes
- BHP Trout Farms
- BHP Twenty37
- BHP Twin Pines
- BHP Whittier

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- Bridge House RTW
- Broomfield TBRA
- Depot Square
- Element Osage
- Element The Nest
- Element Thunderbird
- Family Resource School
- Longmont Fall River
- Safehouse Progressive Alliance for Nonviolence
- Thistle Ledges
- Thistle Lumine
- Thistle Mapleton MHP
- Thistle Pinewood
- Thistle Spruce St

Due to the COVID-19 Pandemic processes were modified to align with HUD issued waivers that allowed flexibility in navigating the City's ability to function within the circumstances of the pandemic. In total, 32 Projects were monitored in 2021, none of which resulted in concerns or findings. The remaining

### **Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 92.351(b)**

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

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

- A. The City staff is responsible for implementing the Marketing Plan and evaluating its effectiveness as required by the CDBG/HOME Program.
- B. The City informs the community about its Affirmative Marketing Policy through periodic updates at public forums and Fair Housing meetings, as well as training workshops with its CDBG/HOME grantees or other similar forums.
- C. The City provides fair housing information/referrals, case investigation services, tenant/landlord information/referrals and mediation services.

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- D. The City collaborates with the office of Human Rights to reduce discrimination in housing.
- E. The City refers tenants and rental property owners to the Community Mediation and Resolution Center (<https://bouldercolorado.gov/community-relations/mediation-program>) regarding tenant and landlord rights and responsibilities.
- F. The City provides information about fair housing, fair housing service providers, fair housing brochures and a copy of the City Affirmative Marketing Plan is available on the City Department of Housing and Human Services, Investment & Grant Compliance website <https://bouldercolorado.gov/services/investment-and-grant-compliance>
- G. The City continues to provide general information and telephone reference numbers to persons contacting the City of Boulder, Department of Housing and Human Services with questions regarding Affirmative Marketing and Federal Fair Housing laws.
- H. The City requires that Grantees of CDBG and/or HOME funded rental/homebuyer housing provide an annual report describing how their actions have complied with the City Affirmative Marketing Plan. (see attachment)
- I. The City periodically posts flyers and brochures which describe fair housing laws and services in open public areas.
- J. Grantees of CDBG/HOME funds instruct all employees and agents on the policy of nondiscrimination of fair housing both in writing and orally.

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

2021 saw the generation and re-use of \$27,209 in program income. These funds were re-invested to support administrative activities and economic development with the CEF Microenterprise program.

### **Describe other actions taken to foster and maintain affordable housing. 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 91.320(j)**

Boulder County has addressed gaps identified in the Needs Assessment over the past five years through housing development, using federal and state Low-Income Housing Tax Credit (LIHTC) dollars and gap funding from HOME and CDBG, as awarded by the State, and preservation projects through BCHA general funds.