



HOME ARPA Allocation Plan: Creating Housing Security Boulder-Broomfield HOME Consortium

Prepared by the Boulder-Broomfield HOME Consortium

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INTRODUCTION

On March 11, 2021, President Biden signed the American Rescue Plan Act (ARPA) into law, enabling over \$1.9 Trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals and businesses.

Congress appropriated \$5 Billion in ARPA funds to be administered by the U.S. Department of Housing and Urban Development (HUD) through the HOME Investment Partnership Program to address the need for homelessness assistance and supportive services. Qualifying Populations (QP) include individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. Eligible activities include:

1. Development and support of affordable housing units
2. Tenant Based Rental Assistance (TBRA)
3. Provision of supportive services
4. Acquisition and development of non-congregate shelter units

As a HOME program participating jurisdiction, the Boulder-Broomfield HOME Consortium received \$4,256,840 million to benefit qualifying populations in our community. This draft plan will describe the Consortium's intended use of the HOME ARP funds as required in [HUD Notice CPD-21-10](#).

The Boulder-Broomfield HOME Consortium includes the City of Boulder, the County of Boulder, City of Longmont, and the City and County of Broomfield. The Consortium entered into an Intergovernmental Agreement (IGA) in 2006 to provide funding throughout the region related to housing outcomes, and to build and strengthen regional partnerships. The Consortium meets on the second Wednesday of each month and consists of 10 members with approximately 3 to 4 members from each participating jurisdiction.

Due to similar needs in each of the communities, each of the partners recognize and value relationships with each of the cities corresponding nonprofit organizations, faith-based communities, and residents, particularly residents who experience both housing insecurity and homelessness.

The priority needs identified in this proposed allocation plan will remain consistent with those identified in the Boulder-Broomfield HOME Consortium's 2020-2024 Consolidated Plan.

CONSULTATION

Describe the consultation process including methods used and dates of consultation:

From August 2022 through February 2023, the Boulder-Broomfield HOME Consortium coordinated with the public, area housing providers, and partner agencies providing family resources, physical and behavioral health services, and others, in a variety of ways, including through:

- 1) Annual distribution of funding. Consortium members work closely with (other) 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;
- 2) Affiliations with local and regional boards, committees and coordination efforts;
- 3) Strong working relationships with local housing and service providers, including meeting regularly to discuss housing and human service needs and to develop strategies to address these needs; and
- 4) Continuous coordination among local jurisdictions and housing and service providers.

The Cities of Boulder and Longmont, and Boulder County formed the Homeless Solutions for Boulder County (HSBC), which coordinates homelessness response systems and housing interventions for individual adults throughout Boulder County, with a prioritization of resources for people who are experiencing chronic homelessness. All initiatives that impact adult homelessness responses are coordinated through this entity.

The Consortium recognizes and appreciates this unique opportunity that these additional HOME ARP funds (Appendix D: SF424's and Certifications) will bring to our collective communities. The Consortium values the ability to improve housing security and to reduce homelessness and is working together to coordinate efforts that serve our collective region. Consultation occurred between August 2022 through February 2023 and involved one-on-one meetings, two/three on one meetings, virtual meetings, public hearings, opportunities for public comment and online surveys.

HSBC coordinates a regional effort (including voucher administration) with homeless transition teams and other representatives from around the region. Each of the municipalities actively coordinated public engagement opportunities and hosted housing forums, updates, and workshops to address housing needs in the community. In particular, in February 2023, a Fair Housing Security Forum provided an opportunity for community stakeholders and regional organizations to collectively identify gaps and plans to take action to fill those gaps. Refer to Table 1 for a list of organizations that were consulted.

In addition, a HOME ARP survey (provided in English and Spanish) was widely shared across the region, and included the Cities of Boulder, Lafayette, Longmont, and Louisville, the towns of Erie, Lyons, and Superior, and the City and County of Broomfield. The Boulder-Broomfield Consortium received 182 responses to the survey and consulted with over 50 organizations from around the region.

TABLE 1: Consultation

Organization	Organization Description	Method of consultation	Feedback / Priority
Boulder Housing Partners	City of Boulder Housing Authority	Email and survey	Project development, housing counseling (expand existing programs, legal services)
Colorado Housing and Finance Authority (CHFA)	Affordable Housing	Email and survey	Senior housing, service needs, development, homeless services
Metro Denver Homeless Initiative (MDHI)	Regional Continuum of Care (CoC) (QP1, QP2, QP3, QP4)	Meetings, email and survey	Service coordination, gap identification, PSH, development of affordable housing
Colorado Department of Local Affairs (DOLA)	State Government	Email and survey	Project development, service needs
Boulder Shelter for the Homeless	Nonprofit, homeless services provider (QP1, QP2, QP3, QP4)	Meetings, email and survey	Project development, service needs
City of Boulder	Local government	Public meetings, advisory board meetings, surveys	Project development
Center for People with Disabilities (CPWD)	Nonprofit: Disabilities	Forum, email and survey	Development, service needs
Homeless Solutions for Boulder County	Collaborative provider for single adult unhoused (QP1, QP2, QP3, QP4)	Meetings	Service coordination, gap identification
City and County of Broomfield	Local government, PJ, Consortium member	Consortium meetings	TBRA
Broomfield Fair Housing Alliance	Fair Housing	Meetings, email and multiple one on one	Project development, service needs
City and County of Broomfield Self Sufficiency	Local government	Multiple one on one	TBRA
City and County of Broomfield Child Care and Affordability Program	Local government	BCSN forum	Development
Ulysses Development Group	For profit, affordable housing developer	Meetings and email	Project development
The Refuge	Day Shelter and Place of Worship (QP1, QP2, QP3, QP4)	Email and video conferencing	Development
Almost Home	Non-Congregate Sheltering (QP1)	Multiple forums and email	Development/ Acquisition
A Precious Child (APC)	Kids and family home needs	Forum	Development/ Supportive Services
Colorado Food Share	Food Security	Forum	Development

Broomfield Fellowship In Service to Humanity (FISH)	Local Family Resource and Food Bank	Email, forum, one on ones	Development/ Acquisition/ Supportive Services
Supplemental Nutrition Assistance Program (SNAP)	Nonprofit: food security	Forum	Service needs
Safehouse Progressive Alliance for Nonviolence (SPAN)	Nonprofit: service provider for victims of domestic violence (QP1, QP3)	Forum/meetings	Service needs
Individuals with Developmental Disabilities (IDD) advocacy groups	Resident coalition: Disabilities	Email, Forums	Development
Clinica Campesina	Medical and public health	BCSN networking organization	Development
Mental Health Partners of Broomfield (MHP)	Mental Health	BCSN networking	Development/ Supportive Services
Discovery Church	Faith-based org	One on One and forum	Development/ Supportive Services
Nativity Church/St. Vincent de Paul	Faith-based org	One on one	Development/ Supportive Services
City and County of Broomfield Housing Department	Local Government	One on one, forum, and email	Development
Broomfield Community Service Network (BCSN)	Network of 30+ nonprofit regional partners	One on one, forum, and their monthly gatherings	Development/ Supportive Services
Broomfield Community Foundation	Non-Profit	One on one, Forums	Development/ Supportive Services
Bal Swan	Elementary School for children with IDD	Forums and one on one	Development
Broomfield F.R.I.E.N.D.S	Nonprofit for adults with IDD	Forum, BCSN, and one on one	Development for people IDD
Senior Resource Board	Nonprofit for seniors	One on One	Development for seniors
City and County of Broomfield Senior Services	Local Government	Multiple one on ones	Development/ Supportive Services
DRCOG Area Agency of Aging	State Government Regional Partner	Forum	Development for seniors along with development of assisted living programs that take Medicaid
Brothers Redevelopment Inc.	Regional Partner	Multiple one on ones	Development
Colorado Housing Connects	Regional Partner	Virtual Interview one on one	Development
City and County of Broomfield Veteran Services	Local Government	Multiple virtual meetings	Development
Broomfield Public Library	Local Government	One on one and virtual meetings	Development
Cross of Christ Church	Faith based partner	Email and forum	Development

United Methodist Church	Faith based partner	Email and forum	Development
Holy Comforter Church	Faith based partner	Email and forum	Development
Colorado Safe Parking Initiative	Nonprofit	Email and forum	Development/supportive services
BVSD- Emerald Elementary	Education	Email and forum	Development/Supportive services
Broomfield Police Department	Local Government	Email and forum	Development/Supportive Services
Colorado Legal Services	Nonprofit, Legal Services, Fair Housing, Civil Rights Organization	Virtual one on one, Email, Survey	Supportive Services
Colorado Poverty Law Project	Law	Virtual one on one, Email	Supportive Services/Development
Adams 12	Education	Virtual, BCSN	Development
Boulder County	Local Government, PJ, Consortium member	Consortium meetings, advisory board meetings	Project Development
Bridge House	Nonprofit, homeless services provider (QP1, QP2, QP3, QP4)	Meetings, email, survey	Project development, housing, service needs
Emergency Family Assistance Association (EFAA)	Nonprofit, homeless services provider (QP1, QP2, QP3, QP4)	Meetings, email	Service needs
Safe Shelter of St. Vrain Valley	Homeless Shelter Services (QP1, QP3)	Virtual, one on one, email	Project development, homeless housing
TGTHR	Youth Homeless Services (QP1, QP3)	Virtual, one on one, email	Project development transitional housing
The Inn Between of Longmont	Nonprofit, homeless services provider (QP1, QP2, QP3, QP4)	Meetings and email	Project development, service needs
City of Longmont	Local Government, PJ, Consortium member	Consortium meetings, advisory board meetings	Project development

Summarize feedback received and results of upfront consultation with these entities:

Through consultation, it was determined that there is a need for:

- Services and housing to support overlooked subpopulations within the HOME-ARP Qualifying Populations, that include individuals with intellectual and developmental disabilities (IDD) and other neuro-diverse populations;
- Acquisition programs to support the needs of unhoused people with lengthy criminal histories;
- The need for additional housing resources specific to the unhoused in Longmont and Broomfield;
- Transitional housing for families and persons at risk of homelessness;
- Additional resources for homeless services including homeless shelters throughout the region;
- The need for supporting various populations who are at high risk for homelessness;
- Senior housing was emphasized, especially those living on Medicaid; and
- Rental assistance.

PUBLIC PARTICIPATION

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan.

Dates of public notice and public comment periods: (Appendix C: Boulder-Broomfield HOME Consortium Public Participation Documentation)

- ***Date(s) of public notice:*** October 30, 2022; February 3, 2023 (Boulder and Broomfield), February 5, 2023, April 22, 2023, April 23, 2023 and April 26, 2023.
- ***Public comment periods:*** November 1, 2022 - November 15, 2022, February 3 - February 20, 2023 (Boulder and Broomfield), February 5 – February 20, 2023, April 22-May 23, 2023, April 23-May 24, 2023 and April 25-May 26, 2023
- ***Date(s) of public hearing:*** November 15, 2022

Describe the public participation process:

The Consortium posted HOME ARP public hearing notices as well as notices for open comment in local newspapers per the dates listed above. No participants attended the public hearing. The notice included HOME ARP eligible activities and the amount the Consortium would receive to benefit qualifying populations in the community. Notices were posted on websites for the City of Boulder, City of Longmont, City of Lafayette and the City and County of Broomfield. Free copies were made available upon request and made available to non-English speaking person and person with disabilities. There were no comments or questions received.

Describe efforts to broaden public participation:

The Boulder-Broomfield Consortium consulted with stakeholders and the community throughout 2022 and early 2023 through various public engagement meetings, focus groups, forums, online surveys, email communication, and various social media platforms. On February 3, 2023, at 2pm, the Broomfield Fair Housing Alliance hosted a Fair Housing forum with Colorado Housing Connects to consult with stakeholders to identify needs and gaps for programs and services. The event was open to all members of the public. From August-October 2022, the Consortium hosted various community workshops and focus groups to address housing needs in the community. From February 3 – February 20, 2023, an online survey (in English and Spanish) was broadly shared with the Boulder County Regional Housing Partnership the general public and other community partners throughout the region. 182 responses were received.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

Through consultation with stakeholders and community partners, the following responses were received:

- Permanent affordable housing for seniors/elderly population
- Permanent affordable housing for people with disabilities/IDD (ADA compliant)
- Prioritize affordable housing throughout the region (acquisition, construction, rehab)
- Regional sheltering

- Transitional housing
- Increase funding for homelessness services and service providers
- Supportive Services (housing counseling, landlord education)
- Rental assistance (TBRA)
- Increase in housing vouchers
- Utility assistance, security deposit assistance

Since January 2023, there have been over 1500 requests per week for rental assistance with numbers gradually increasing each week. This is a reflection of high rent prices, overall inflation and an increase in utility costs. Feedback from the housing forum included an increased need for rental assistance. Currently, there are gaps in resources to support this need. Recommendations included increasing affordable housing and financial services to help families struggling to pay bills.

Senior housing was identified as a top priority by agencies and organization consulted. Seniors living on a fixed income are at risk of becoming homeless (especially as rent and food costs increase) and are severely rent-burdened. As the population ages, the need for accessible, affordable units will continue to rise. Accessible units paired with access to transportation and nearby services is imperative to independence of aging residents. Stakeholders indicated a shortage of affordable, accessible units, putting this population at risk of homelessness.

It was emphasized that there is a need for supporting various populations at-risk for homelessness and/or at greatest risk of homelessness including groups overlooked such as those with disabilities, intellectual and developmental disabilities (IDD) and other neuro-diverse populations, including younger populations exiting high school. Homeownership for the disability community is unrealistic as they face discrimination in employment opportunities. There is a gap in job training for the disability community with growing concerns that this population is at high risk for homelessness. A participant at the housing forum shared that during their outreach, 53% of individuals shared that they have a type of disability and are often overlooked. It was identified that access to computers, phones and broadband is a cost burden. Stakeholders indicated a shortage of affordable housing and other resources, which are imperative to the independence of disabled residents putting this population at risk of homelessness.

Overall, the consultation process identified and recommended that there is a shortage of affordable and accessible housing, rental assistance, supportive services, prevention programs, employment opportunities and homeless related housing and services.

Online Survey Results

An online survey (provided in English and Spanish) was widely shared across the region (Appendix A: Community Partner Survey & General Public Survey) and was provided to stakeholders, community partners as well as the public. The survey was shared with the Cities of Boulder, Lafayette, Longmont, and Louisville, the towns of Erie, Lyons, and Superior, and the City and County of Broomfield. The Boulder-Broomfield Consortium received 182 responses combined.

Community partners that participated identified as a public housing authority, an organization that addresses needs of people experiencing homelessness such as emergency/temporary shelter provider, supportive services provider, and government agency.

Top priority areas for the qualifying populations were reflected in the online surveys. Responses were rank based with 1 being the highest and 4 being the lowest. The areas the rose to the top for the organizations are as follows:

Community Partners: priority area ranked highest to lowest

- (100%) Development and Support of Affordable Housing (including rehab of existing units): Assistance for Landlords, Permanent Supportive Housing, Creating New Affordable Housing Units, Rehab of Existing Units.
- (50%) Acquisition and Development of Non-Congregate Shelter(s): Scattered Sites
- Hotel/Motel Rooms, Conversion of Existing Shelters (Congregate to Non-Congregate setting), Acquiring Existing Buildings for Use as Non-Congregate Shelter.
- (25%) Supportive Services: Housing Counseling, landlord/tenant rights, housing search, budgeting, credit education/repair, etc. (does not include first time home buyer or foreclosure counseling, Homelessness Prevention Services, Job Readiness, Life Skills Training, Case Management Services.
- (25%) Tenant Based Rental Assistance (TBRA): rental assistance, security deposits, utility deposits, and utility payments.

General Public: priority area ranked highest to lowest

- (26.3%) Supportive Services: Housing Counseling, landlord/tenant rights, housing search, budgeting, credit education/repair, etc. (does not include first time home buyer or foreclosure counseling, Homelessness Prevention Services, Job Readiness, Life Skills Training, Case Management Services.
- (25.8%) Development and Support of Affordable Housing (including rehab of existing units): Assistance for Landlords, Permanent Supportive Housing, Creating New Affordable Housing Units, Rehab of Existing Units.
- (25.3%) Tenant Based Rental Assistance (TBRA): rental assistance, security deposits, utility deposits, and utility payments.
- (22.6%) Acquisition and Development of Non-Congregate Shelter(s): Scattered Sites

Demographic data from the public that was surveyed:

Household Type

- Married: 41.57%
- Senior/elderly 55+: 28.09%
- Single: 17.98%
- Single parent female HOH: 3.93%
- Single male parent head of household: 2.81%
- Single parent gender fluid head of household: 0.56%
- Other: 3.37%

Race/Ethnicity

- Caucasian: 77%
- Prefer not to answer: 15%
- Other: 6%
- Asian: 1%
- Black/African American: 1%

- Native Hawaiian/Pacific Islander: 1%
- Hispanic: 8%
- Non-Hispanic: 92%

Qualifying population they identified as:

- Renter: 17%
- Previously homeless or at risk of homelessness: 14%
- Works for organization that develops/supports affordable housing: 19%
- None/other: 59%

Feedback

Survey feedback from community partners and the public highlighted lack of affordable rental housing, permanently affordable housing, cost of housing, housing counseling, transitional housing, lack of mental health and substance use services, landlords' refusal to accept housing vouchers, landlord education, encampments, accessible housing for seniors and people with disabilities, and overall lack of funding.

There was a general consensus that development of permanent affordable rental housing is the highest priority need across the region. Feedback indicated the following: 1) rising rental rates and home prices matched with the rising costs of living and lack of wages prevent housing security all rose to the top; 2) those who are disproportionately marginalized include Black Indigenous and People of Color (BIPOC), LGBTQIA+, people with disabilities, and people with both intellectual and developmental disabilities (IDD), as well as individuals with criminal backgrounds exiting jail and/or prison (Justice Housing).

Due to the significant lack of affordable units, there were two additional themes that emerged regarding limited housing options, particularly for seniors and people with IDD. There is a shortage for households living on fixed incomes, often at or below 50% of AMI, such as seniors and people with disabilities, who also meet the qualifications under this funding source (QP4). Community feedback included growing concern that seniors are disproportionately unable to keep up with rent in both LIHTC housing and market rate housing. Additional feedback received regarding individuals with IDD was provided to the Consortium by FRIENDS of Broomfield who acknowledged that the average wait time for someone with IDD to be placed in a home that fits their unique needs is over 10 years. In addition, many aging parents are struggling to find homes for their adult children with IDD, including those exiting high school. Funding and supportive services are needed to keep this population housed and employed.

Additional themes that emerged were prevention services for people experiencing homelessness and the need for housing navigation. There is a lack of supportive services (particularly among the chronic homeless population) and a growing need for individuals that fall back into homelessness without the assistance of navigating multiple systems. Even as households who have access to affordable units continue to experience a high need for supportive services to assist in accessing housing and other resources. Stakeholders recognize that the amount of funding received is not adequate to make significant impacts within the Consortium area. The Consortium has identified other funding sources to address these identified service needs. Other sources include a wide tapestry of permanent supportive housing; mental health case management; locally funded units, support and

vouchers; retention services; and coordinated outreach and navigation. Funding includes local general funds, competitive awards, CoC awards, and federal funding.

Needs Assessment and Gaps Analysis

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

QPI - Homeless as defined in 24 CFR 91.5

Eligible populations under this definition include individuals or families who:

- lack a fixed regular and adequate nighttime residence
- will imminently lose their nighttime residence
- unaccompanied youth under 25 years of age or families with children or youth who do not otherwise qualify as homeless under this definition (with criteria).

The Boulder-Broomfield Consortium utilized multiple sources and data points from the Colorado Coalition for the Homeless, the major regional partner for the Consortium, as well as Metro Denver Homelessness Initiative (MDHI), who is the major partner across the region for the PIT counts, and Housing Needs Assessments (from communities that were not specific to the application process but did provide the necessary data to inform the Consortium's analyses of the data). The table below reflects the MDHI point in time (PIT) for the homeless population.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table (Boulder and Broomfield)

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	1621	609	2467	#	0								
Transitional Housing	367	1245	714	#	220								
Permanent Supportive Housing	427	1035	3510	#	1456								
Other Permanent Housing	894	1261	1240	#	20								
Sheltered Homeless						351	3303	312	872				
Unsheltered Homeless						11	2014	120	231				
Current Gap													

Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

The counts in the Homeless Needs Inventory and Gap Analysis Table above reflect totals for the entire seven-county metro area including Boulder and Broomfield counties. (The region makes up the MDHI governance). Specific to the Consortium, each member community shows a disproportionate number of people experiencing homelessness as a percentage of the general population, compared to other communities. In Boulder County, approximately 1,000 people go through screening for sheltering and services.

Specifically, the 2022 PIT Count reported 543 individuals experiencing homelessness within Boulder and Broomfield counties. The largest percentage of people experiencing homelessness were white, but many people experiencing homelessness who consider themselves BIPOC are over-represented in comparison to the general two-county population (see chart below).

Race	2022 Point in Time Count MDHI		General Population 2021 ACS		Variance
	Number	Percentage	Number	Percentage	
Total Population	543	100%	404,868	100%	
White	406	74.77%	315,004	77.80%	-3.90%
Black/African- American	63	11.60%	3,960	0.98%	1086.20%
American Indian/ Native American	17	3.13%	982	0.24%	1190.78%
Asian	0	0.00%	19,662	4.86%	-100.00%
Pacific Islander/ Native Hawaiian	0	0.00%	1,104	0.27%	-100.00%
Other	0	0.00%	12,238	3.02%	-100.00%
Multi-Racial	57	10.50%	51,918	12.82%	-18.14%

2022 Point in Time by Race – Compared to General Population (2021 American Community Survey)

Although people experiencing homelessness who identify as BIPOC are overrepresented in the Point in Time Count, they also have higher rates of system-assisted exits from homelessness in our region compared to white people experiencing homelessness. For example, in Boulder County for the first quarter of 2023, people identifying as Black/African American exited homelessness at a significantly higher rate than shown in the Point in Time Count or the general population:

	Q1	Q2	Q3	Q4	County Demographics ²
Asian	0				5%
African American/Black	33%				1%
Caucasian/White	67%				90%
Native American	0				1%
Other	0				2%
Hawaiian/Pacific Islander	0				>1%
Hispanic	0				14%
Not Hispanic ³	100%				77%

HSBC 1st Quarter Housing Exits by Race/Ethnicity

People experiencing homelessness is as follows:

- 468 adults without children (157 female, 301 male, 6 gender nonconforming);
- 23 households; families with children (15 female, 8 male);
- 32 households that includes a veteran family member;
- 112 persons displaced by domestic violence;
- 186 persons with mental health issues;
- 155 persons reported with substance use issues; and
- 389 persons living with a disability, a chronic health condition, a developmental condition or any other disabling condition.

Analysis of the 2022 PIT shows a significant portion of single adults are considered chronically homeless (26%) with significant barriers to housing stability such as mental health issues and substance use issues. Nearly 72% (389 people) have a disability, chronic health condition, developmental condition or other disabling condition. As such, the lack of sufficient housing with supportive services impacts the housing stability of these individuals. In addition, many of the people who have been placed in permanent supportive housing experienced homelessness for multiple years, sometimes decades, and some violated their leases through behaviors associated with combatting the isolation of housing. As such, they returned to homelessness.

QP2 - At Risk of Homelessness as defined in 24 CFR 91.5

HUD defines a person or individual who is “At Risk of Homelessness” as:

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD; (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and (iii) Meets one of the following conditions: (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance; (B) Is living in the home of another because of economic hardship; (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low income individuals; (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau; (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan; (2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(l) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or (3) A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

The number of families and individuals served through homelessness prevention services has continued to rise. Area agencies have assisted thousands of people with rental assistance, eviction prevention, and utility assistance. Families with one parent and persons of color are at higher risk of homelessness and are therefore over-represented in service totals.

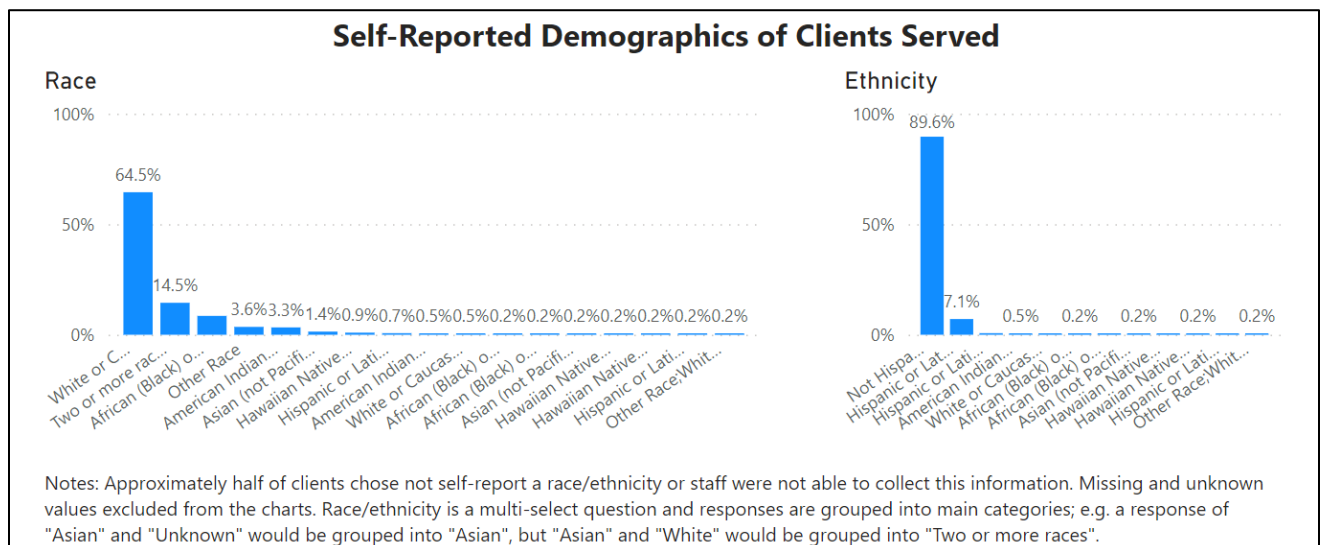
While Census information lags and may not accurately reflect recent economic conditions, the 2021 American Community Survey reflects the disproportionate impact of poverty (as an indicator of people within QP2) on families of color.

Race	Persons Living in Poverty 2021 ACS		General Population 2021 ACS		Variance
	Number	Percentage	Number	Percentage	
Total Population	38,112	100%	404,868	100%	
White	31,391	82.37%	315,004	77.80%	5.86%
Black/African- American*	0	0.00%	3,960	0.98%	
American Indian/ Native American*	0	0.00%	982	0.24%	
Asian	1,819	4.77%	19,662	4.86%	-1.72%
Pacific Islander/ Native Hawaiian*	0	0.00%	1,104	0.27%	
Other	746	1.96%	12,238	3.02%	-35.24%
Multi-Racial	4,156	10.90%	51,918	12.82%	-14.96%
Hispanic/Latine	6,004	15.75%	56,545	13.97%	12.80%

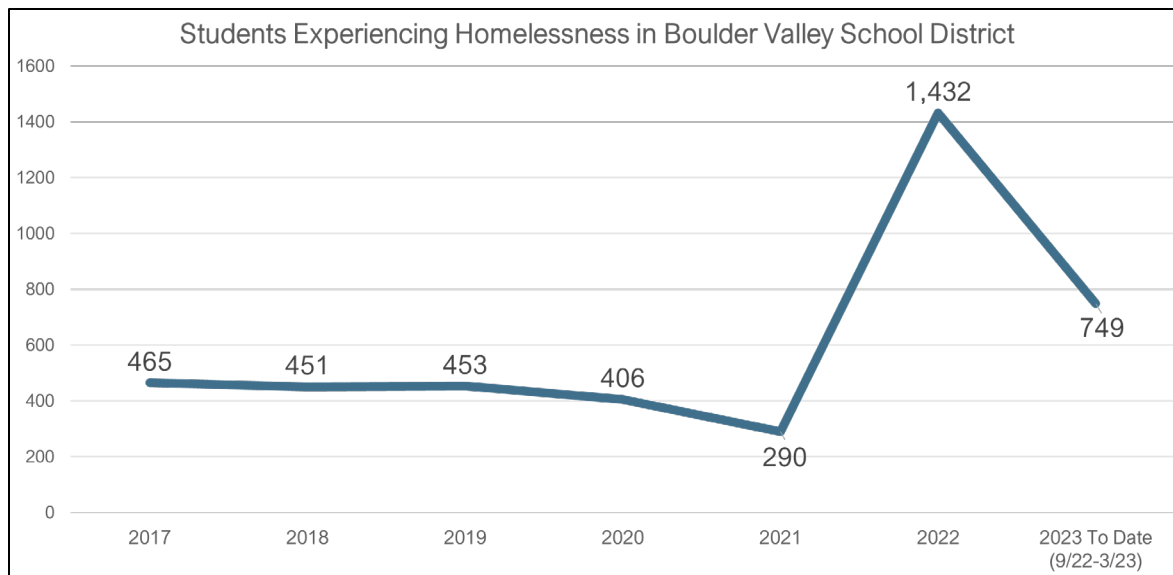
***Poverty - No statistically significant information**

Persons by Race/Ethnicity Living in Poverty – Compared to General Population (2021 American Community Survey)

Collecting race and ethnicity data across all of the rental assistance programs the Consortium can be challenging, due to the wide variety and number of service providers and programs. Using the City of Boulder’s Eviction Prevention and Rental Assistance (EPRAS) program as an example, the following breaks down those served by race and ethnicity:



Using information from the Boulder Valley School District as an indicator of family homelessness (typically meeting QP2 HUD definition of At Risk of Homelessness), we can see the impact of changing needs. Results from the 2022-23 school year did not include the full year.



The need for increased supports for housing stability is indicated through over 1,500 requests per week for rental assistance that the Consortium currently experiences. The cost of housing, limits in affordable housing, and other economic factors make lower income populations particularly vulnerable to the risk of homelessness.

QP3: Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice.

HUD defines this populations as families or individuals who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

Boulder and Broomfield are served by two agencies specifically serving victims of domestic violence. In general, these two organizations serve 663 participants per year, and have reported that this population is growing. They primarily serve low-income families/single parent families, and their housing needs are generally incorporated into broader homeless housing once served by providers. MDHI’s PIT count determined that 22% of Boulder County's homelessness people were fleeing DV and 15% of Broomfield’s homelessness population were fleeing DV. We also know that there are limitations to the PIT count and data sources due to the dynamic nature of homelessness. Qualifying

populations under this category include those persons who are actively fleeing domestic violence, dating violence, sexual assault, stalking or human trafficking who may not be currently experiencing homelessness. Due to confidentiality issues, demographic data was not included in the illustration of this qualifying population.

Safehouse Progressive Alliance for Nonviolence (SPAN) and Safe Shelter of St. Vrain Valley provide support for survivors of domestic violence through a variety of crisis and transition support services. SPAN also offers emergency shelter beds and transitional housing. In 2022, Safehouse Progressive Alliance for Nonviolence (SPAN) reported that they received 9,948 calls to their crisis hotline and reported 254 adults and 108 children stayed overnight in their shelter. SPAN’s transitional services focus on supporting victims of domestic violence through case management and help support individuals with navigating housing options. However, limited shelter space and funding for people leaving domestic violence situations was identified as a barrier/gap. Service providers reported gaps in service delivery largely due to growing needs and lack of resources. The most significant gaps exist in resources for *families* experiencing domestic violence, especially to address the severe housing and childcare shortage, which means that these families will likely remain with the abuser rather than seek independence. Gaps in these services put this population at risk.

Human Trafficking continues to be an issue in Colorado:

Table 2: FBI Investigations and Arrests CY 2019–2021			
Year	Investigations Opened	Investigations (breakdown by type of trafficking)	Investigations (breakdown by age of victim)
2019	40	38 sex trafficking 2 labor trafficking	Sex trafficking investigations: 25 cases with only minor victims; 13 cases with adult victims Labor trafficking investigations: breakdown by age unknown
2020	32	31 sex trafficking 1 labor trafficking	Sex trafficking investigations: 23 cases with minor victims; 5 cases with adult victims; 3 cases with both adult and minor victims Labor trafficking investigations: 1 case with an adult victim
2021	33	28 sex trafficking 2 labor trafficking 3 both sex and labor trafficking	Sex trafficking investigations: 24 cases with minor victims; 4 cases with adult victims Labor trafficking investigations: 2 cases with adult victims Investigations with both sex trafficking and labor trafficking: 3 cases with adult victims

Data source: Federal Bureau of Investigation-Denver field office.

Human trafficking disproportionately impacts foreign nationals.

Table 14: OVC-Funded Programs, Numbers of Victims Served, FFY 2019-2021												
Colorado Organization 1*					Colorado Organization 2**				Colorado Organization 3			
BREAKDOWN OF VICTIM PROFILE												
Fiscal Year	Open Cases	Of Open Case Load, # of New Cases	Foreign Nationals	U.S. Citizen/ Legal Permanent Resident (LPR)	Open Cases	Of Open Case Load, # of New Cases	Foreign Nationals	U.S. Citizen/ LPR	Open Cases	Of Open Case Load, # of New Cases	Foreign Nationals	U.S. Citizen/ LPR
2019	120	33	112	8	67	50	30	37	5	5	3	2
2020	136	27	127	9	96	66	46	50	33	30	14	19
2021	118	6	114	4	76	36	47	29	40	29	19	21

Data source: Colorado data were obtained from three Colorado-based grantees of the U.S. DOJ/OVC human trafficking grant programs.

* During FFY 2021, Organization 1 had two active grants from OVC. Only the data from the FFY 2019 grant are included in the report because the data could not be de-duplicated to produce data on unique clients, and for the FFY 2021 grant, OVC's performance measures and reporting system changed, so the same data points for comparison were unavailable.

** During FFY 2019, Organization 2 had two active grants from OVC. Only the data from the FFY 2019 grant are included in the report because the data could not be de-duplicated to produce data on unique clients.

However, there have been no reported incidents of Human Trafficking for Sexual Servitude or Involuntary Servitude in Boulder or Broomfield Counties over the past three years:

Table 6: Incidents of Human Trafficking—Sexual Servitude, Colorado NIBRS Data, CY 2019-2021			
Jurisdiction by City or County	2019	2020	2021
Adams County Sheriff's Office		5	21
Arapahoe County Sheriff's Office	2		
Aurora Police Department	10	2	6
Brighton Police Department			2
Centennial Police Department	1		
Colorado Springs Police Department	3	12	20
Commerce City Police Department			4
Denver Police Department	26	12	12
Douglas County Sheriff's Office	2	1	
Fort Collins Police Department		2	1
Grand Junction Police Department			1
Greeley Police Department		7	1
Jefferson County Sheriff's Office	7		
Kiowa County Sheriff's Office	1		
Lakewood Police Department	1		6
Larimer County Sheriff's Office		1	4
Louisville Police Department		1	
Loveland Police Department	1		1
Parker Police Department	1		
Thornton Police Department	1		
Westminster Police Department			1
Wheat Ridge Police Department	2		1
TOTAL	58	43	81

Data source: Colorado Bureau of Investigation and the jurisdictions listed.

QP4 - Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice.

Other Populations as defined by HUD include:

Other Families Requiring Services or Housing Assistance to Prevent Homelessness is defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

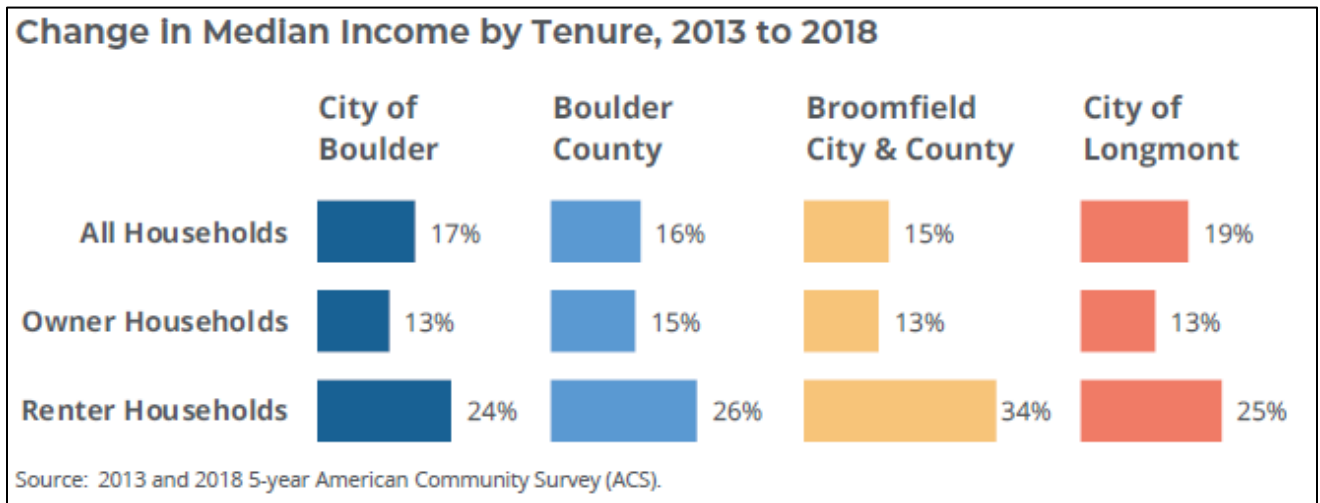
At Greatest Risk of Housing Instability is defined as household who meets either paragraph (i) or (ii) below: (i) has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs); 8 (ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5: (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance; (B) Is living in the home of another because of economic hardship; (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals; (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau; (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan Veterans and Families that include a Veteran Family Member that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	55,842		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	3,175		
Rental Units Affordable to HH at 50% AMI (Other Populations)	13,658		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		12,580	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		3,419	
Current Gaps			

Suggested Data Sources: 1. 2020-2024 Consolidated Plan Boulder Broomfield Regional Consortium.

As identified in the Consortium’s 2020-2024 Consolidated Plan (2013-2018 American Community Survey data), all Consortium member jurisdictions showed a mismatch between affordable units and renters who have low incomes as noted in the Housing Needs Inventory and Gap Analysis table above. In Boulder alone, there is a shortage of 7,630 units renting for less than \$875 per month, the rent level under which the rental unit gap exists. Income required to afford the average rent is between \$69,120 - \$78,360. The region’s housing subsidies assist approximately 1,500 people who have disabling conditions, many of whom are older adults who struggle to pay their monthly rent and mortgage. As the housing costs continue to rise significantly in Boulder and Broomfield counties, we will continue to see critical levels of households being severely cost burdened and/or at greatest risk of housing instability.



Stakeholders indicated an overall shortage of affordable housing putting this population at greatest risk of homelessness. Approximately 20,000 households (17,000 renters) are considered to be severely housing cost burdened paying more than 50 percent of income toward housing costs. This equates to 38% of all renters in the community. Cost burden is one of the most common housing problems affecting renters, which is reflective of the area’s very high rent prices. Households spending 50 percent or more of their income on housing are considered at risk of homelessness. Overall, these families and individuals, generally and overwhelmingly households of 50 percent AMI or less, are at high risk of homelessness.

The primary housing characteristic in the Consortium area affecting housing instability and increased risk of homelessness is the inability to find and remain in an affordable rental unit. Residents living in unstable housing conditions are more likely to say they have faced housing discrimination, have trouble servicing other household debt, and cannot afford a rental security deposit. As a result, they live in temporary housing conditions.

Median Income by Race and Ethnicity, 2018

	All Households	African American Households	Asian Households	Hispanic Households	Two or more Race Households	Non-Hispanic White Households
City of Boulder	\$66,117	\$42,692	\$52,660	\$39,076	\$40,636	\$71,503
Boulder County	\$78,642	\$49,314	\$90,234	\$49,192	\$62,796	\$83,417
Broomfield City and County	\$89,624	\$89,875	\$111,401	\$65,854	\$68,393	\$92,860
City of Longmont	\$69,857	\$53,107	\$75,000	\$48,438	\$54,038	\$73,621

Note: Shaded boxes indicate median incomes that are higher than the median for all households.

Source: 2018 5-year American Community Survey (ACS).

The households that are most vulnerable to housing instability include those with mental health challenges, special needs or disability conditions, income instability due to underemployment or lack of livable wage, poor social networks, substance abuse, single-parenthood with multiple children, and/or former foster care history. Inter-generational poverty is also a typical client characteristic for many households in higher-risk housing programs.

Stakeholders acknowledged that the most significant supportive service needs of special populations include temporary shelter and transitional housing, especially to address severe housing shortages, affordable childcare and reliable transportation, especially for people with disabilities who need public transit in close proximity to their residence. In the Consortium counties, approximately 31,000 residents (8 percent of the population) have some type of disability and experience one or more housing problems. Overall, 6 percent of residents in Boulder have some type of disability. In Boulder County, 8 percent of residents have a disability. People with disabilities represent 9 percent of the population in both Broomfield and Longmont. In the Consortium area, 70,341 residents are ages 62 years or older, accounting for 18 percent with the Consortium area. Twenty-two percent of older adult households have some type of housing need. Housing challenges identified for older adults and people with disabilities included finding a unit that meets their accessibility needs and managing the rent cost.

As evidenced by the 2022 PIT, 389 people are currently experiencing homelessness and live with a disability, chronic health condition, developmental condition, or other disabling conditions. This shows that people with certain disabling conditions are at higher risk of homelessness than the general public. Several factors contribute to this, including but not limited to, reliance on SSDI and SSI rather than having an ability to seek gainful employment, healthcare support costs, and large medical expenses.

FRIENDS of Broomfield reported that the average wait time for someone with IDD to be placed in a home that fits their unique needs is over 10 years, and that the “one size fits all” model does not align with inclusivity, accessibility, diversity, and equity with regard to housing. A variety of housing is

needed to reflect the needs of the IDD population. Households with members who have Intellectual & Developmental Disabilities (IDD) face some of the highest forms of housing instability and puts this population at risk.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

QP1:

Boulder and Broomfield counties have established a broad network of homelessness response and housing programming. The members work with the local Continuum of Care (Metro Denver Homeless Initiative, MDHI) to coordinate and to ensure prioritized access to available housing resources.

Within Boulder County, sheltering needs for single adults are met through Boulder Shelter for the Homeless (160-180 beds year-round, up to 30 non-congregate spaces during winter), and Homeless Outreach Providing Encouragement (HOPE) for Longmont (49 beds year-round and additional severe weather shelter overflow beds). Women and people who identify as transgender or non-binary can also shelter at The Lodge (20 beds with an additional 12 severe weather shelter overflow beds). Youth sheltering is provided by TGTHR's The Source (14 beds). Broomfield provides non-congregate severe weather shelter services (variable beds, depending on severity of weather conditions and demand).

The Consortium did want to highlight some important factors regarding congregate shelters to explain why there were some available beds. Those factors include: some people experiencing homelessness do not always feel safe in congregate shelters, some people together as couples, high levels of intoxication from certain substances preclude the ability to function in a congregate setting, some suffer from PTSD or anti-social mental illnesses, and a small number of pet owners do not seek congregate shelters because they cannot bring their animals or are unwilling to use free kenneling services. The Consortium does avail itself of non-congregate shelter (30 hotel rooms) during the winter months as an opportunity to engage at a higher level with some people and has a robust outreach system that allows people to move directly from unsheltered homelessness to housing. In addition to vouchers and unit development, members of the consortium are currently working on the provision of housing and services for people who are considered to have significant barriers to PSH or traditional sheltering systems. This involves the purchase of condo units to use for people experiencing chronic homelessness, development of residential and out-patient services for people experiencing homelessness with significant substance use disorders, investigation of non-congregate sheltering opportunities, development of a day services navigation center, and the implementation of a housing retention team for newly placed PSH and Rapid rehousing participants.

Supportive services range from coordinated outreach systems through which connections to housing prioritization needs are conducted (i.e. documentation, Vulnerability Index – Service Prioritization Decision Assistance Tool (VI-SPDAT), etc.); encouragement for engagement with sheltering opportunities; housing-focused case management services associated with shelters, jails, and the community court (Boulder Municipal Court that connects people experiencing homelessness with services in lieu of sentencing for low level infractions); case management connected with housing programs (this includes permanent supportive housing, rapid re-housing, and Substance Abuse and Mental Health Services (SAMHSA)-funded supportive services associated with non-PSH affordable

housing placements); and peer support services provided by people formerly experiencing homelessness.

QP2:

The Consortium has prioritized homelessness as part of its affordable housing programming. For example, the City of Boulder has a goal of having 15% of total development be affordable and 15% of affordable housing dedicated to Permanent Supportive Housing (PSH). The housing authorities and governmental authorities regularly connect to discuss housing gaps and develop annual strategic plans for housing and voucher provision. Boulder and Longmont have developed local voucher programs to serve targeted populations that might not be able to obtain federal vouchers.

QP3:

Persons fleeing domestic violence can shelter at Safehouse Progressive Alliance for Nonviolence (SPAN) or Safe Shelter of St. Vrain Valley. Because of the traumatic impact of shelters on children, the community opted to not run a congregate family shelter but rather provide short-term hotel stays for families in need of sheltering.

QP4:

Broomfield provides Tenant Based Rental Assistance (TBRA) services on behalf of the consortium. Boulder County manages a rapid rehousing program.

While demand is higher than supply, the Consortium has a robust affordable housing program which aims to serve the needs of QP4.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

According to Boulder County's coordinated entry data, approximately 1,000 individuals seek shelter and homeless services annually. Boulder County currently averages a 30% outflow to housing. Individuals often have specific barriers, such as significant disabilities and extensive criminal histories, that prevent them from effectively accessing services within the system.

The Consortium has locally funded a considerable network of shelter and outreach services that are aligned and coordinated to meet the needs of the unhoused population. However, the greatest need continues to be housing that is connected to robust supportive services.

People who are prioritized through the Continuum of Care's OneHome process often qualify for PSH vouchers but cannot locate, with assistance, units to rent due to insufficient available affordable housing resources and significant barriers to leasing (lengthy criminal histories, active use of substances, etc.). Housing for people experiencing chronic homelessness must be accompanied by supportive services (case management, and in some case retention services), and general housing authority affordable housing will not meet this need.

Resources would be allocated to create or preserve housing units to house individuals experiencing homelessness. The greatest unmet need for QP1 is housing units with supportive services for people who cannot access existing housing and/or vouchers.

At Risk of Homelessness as defined in 24 CFR 91.5

The cities of Boulder and Broomfield, in conjunction with Boulder County utilize a variety of funding sources including but not limited to tax funded eviction prevention services, special revenue fund, and general fund. These local funds provide flexibility in addressing the needs of specific individuals. The Consortium has developed pathways to longer term support where appropriate.

Individuals with disabilities, fixed incomes, and families are often most significantly impacted by rising rental costs. These individuals and families are most likely to be at the lowest income levels, and frequently are at risk of homelessness.

Limited availability of rental assistance is coupled with a lack of affordable housing units targeted at 30% AMI. Therefore, people who are at lower income levels cannot afford to live in the community. Thus, the greatest unmet need for QP2 is access to affordable housing units serving people at risk of homelessness who are at or below 30% AMI.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Those that were fleeing domestic violence represented 22% in Boulder County and 15% in Broomfield. Domestic violence organizations report increasing demand for services. This is primarily due to the impact of COVID. Sheltering and counseling services have been taxed, and there are structural limitations to available supportive housing. Generally, most families in domestic violence shelters either self-resolve or enter transitional housing or rapid re-housing programs. The Inn Between in Longmont often assists such families in addition to individuals experiencing traditional homelessness.

While people meeting the definition of QP3, either who are currently experiencing homelessness or not, have access to a wide variety of counseling and sheltering services, the demand for such housing and services is increasing. Therefore, the greatest unmet need for QP3 is adequate transitional housing or rapid rehousing programs.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice.

Per the standard definition of QP4 as previously defined, as average rents continue to rise, the number of individuals who are at the greatest risk of housing instability continues to rise. Emergency financial assistance has at times not been a sufficient intervention to stabilize the household. With a significant number of cost burdened households, a greater number of households in both Boulder and Broomfield are at risk of homelessness.

Those with disabling conditions averaged 10%, those with chronic health conditions averaged 30% and those with mental health averaged 36%. The growing number of seniors experiencing homelessness or experiencing housing instability is of concern. This leads to impacts on the design of traditional permanent supportive housing or short-term assistance. Resources would aim to partially fill the gap of services for this population as with people who have IDD. Families whose head of household or family member suffers from intellectual development disability are often at high risk of homelessness.

The greatest need for people meeting QP4 criteria is the creation of affordable housing units.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

The number of individuals and families attempting to access the homeless service system has consistently been more than the system is able to effectively serve. The emergency sheltering system in Boulder has struggled to meet the needs of those individuals with significant disabilities as well as families in need of emergency services. Individuals who are unable, due to behavioral health and significant physical disabilities, to reside in congregate living situations often are unable to find safe overnight accommodations when experiencing homelessness. Boulder and Broomfield have also seen a rise in demand for family emergency sheltering that the system has struggled to meet.

In the last year, 1,000 individuals entered the homeless service system. During that same period of time, the system was able to assist 295 individuals out of homelessness, into permanent housing. With growing housing costs in Boulder and Broomfield, the demand for housing assistance is expected to grow, further impacting the housing and service delivery system. Individuals with significant disabilities struggle to effectively engage in the current system. Resources available to serve this population are not sufficient and services providing both housing and supportive services continue to be stretched.

Housing for 50% AMI or lower continues to be the most needed housing resource in the region. Current data (Appendix B: Vacancy Rates 4Q 2022) shows the south Boulder area has the lowest vacancy rate currently at 2.85%. Overall Metro Denver vacancy rate is 5.61%. Our current inventory of conventional subsidized housing (typically >30% AMI), therefore the available unit range (based on vacancy rates) is 112-220. Our combined Boulder/Broomfield most recent Point in Time count shows 543 people who were either sheltered or unsheltered homeless; when vacancy rates are applied to current housing inventory the housing gap could be 323-431 units for households who are extremely low income/homeless.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Identify priority needs for qualifying populations:

As discussed in earlier sections, the greatest needs for each QP are:

QP1: housing units with supportive services for people who cannot access existing housing and/or vouchers.

QP2: access to affordable housing units serving people at risk of homelessness who are at or below 30% AMI.

QP3: adequate transitional housing or rapid rehousing programming.

QP4: the creation of affordable housing units.

There is a critical need for affordable housing for all four Qualifying Populations, particularly those experiencing homelessness, at risk of homelessness and those at greatest risk of housing instability. These priority needs are consistent with those identified on the Boulder-Broomfield HOME Consortium 2020-2024 ConPlan. While there is also an identified gap in supportive services such as assistance with housing navigation, rental assistance, and other financial supportive services (i.e., security deposits, utility deposits, and utility payments), the Consortium will utilize other funding sources to address these needs.

Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

The Consortium met on multiple occasions to determine the scope and breadth of the housing issues faced by the QPs. This included gathering input from various nonprofit and government agencies, analysis of available data, and a review of the applicability of HOME ARPA to the response to these gaps. Following the review of this information, in coordination with the homelessness response and affordable housing systems, the consortium developed a review matrix for evaluation of project applications. Proposed applications were evaluated against many criteria, but higher weighting was given to proposals that helped address the identified needs and gaps.

Boulder and Broomfield have a sophisticated service provision model. The Consortium uses data to inform decisions about the effectiveness of service delivery and the ongoing needs in the community. An example of this successful use of coordinated efforts is demonstrated by the successful exits of over 1,500 people from homelessness since late 2017.

However, through consultation with stakeholders, it has been identified that the demand for affordable housing and supportive services continues to grow as aligned with national trends. As such, the community is faced with a housing deficit.

More specifically, individuals with significant disabilities struggle to effectively engage in the current system, making them at greatest risk for housing instability and experiencing homelessness. Resources available to serve this population are not sufficient and services providing both housing and supportive services continue to be stretched.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The method that will be used will consist of targeted solicitation of applications based on the needs of the community. The projects will align with the priorities of the HOME ARP funding guidelines.

The most recent housing assessments within the Consortium remain relevant. Housing development partners and providers are currently working on predevelopment concepts and financing for affordable housing units as well as homeless services. The Consortium members are furthering those conversations with the HOME ARP funding in mind. A few key factors that will guide the Consortium's decision will be the readiness of the project, the financial stability of the project, and whether or not the project fits into the specific areas identified within the guidelines.

Describe whether the PJ will administer eligible activities directly:

No, the Boulder-Broomfield Consortium members will administer all eligible activities through their subrecipients/contractors.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program: N/A

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Acquisition and Development of Affordable Rental Housing	\$ 3,831,156		
Nonprofit Operating	\$ 0	0 %	5%
Nonprofit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 425,684	10 %	15%
Total HOME ARP Allocation	\$ 4,256,840		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

This allocation plan, based on consultation, public participation, community agency response, and the needs assessment and gaps analysis, reflects the following priorities:

- Commit funds to increase housing inventory in the Consortium area.

The Consortium will deliberate and take all feedback into consideration, in addition to ranking projects based on eligible criteria. Projects that do not meet the priority needs in the most recent needs assessment will not be funded.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

Boulder and Broomfield counties have significant issues related to affordable housing. The long-term solution to addressing the needs of all four qualifying populations must include an increase in the

Consortium's housing inventory, in particular for persons experiencing homelessness, those at risk of homelessness, as well as those earning below 30% AMI and are severely cost burdened. The cost of housing is prohibitive for many families and individuals who face significant barriers, including individuals with an identified disability, as well as seniors/older adults. Data provided above show that there is a significant gap in housing resources, compared to the demand for housing needs. While the community has made strides in increasing the number of affordable and supportive housing units, demand has consistently increased for housing and services.

Project selection will focus primarily on increasing the inventory of housing units, specifically for QP1, QP2 and QP4 households.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation.

The Consortium estimates approximately 60 units can be created leveraging the HOME ARP funds for qualifying populations. The Consortium will address the affordable housing needs of persons with disabilities identified as a need in the needs assessment and gaps analysis by restricting no more than 30% of the total number of rental units assisted with HOME-ARP funds for low-income households and restricting the remaining 70% of the total number of rental units assisted with HOME-ARP funds for households that meet the HOME-ARP qualifying populations definitions. Section 811 vouchers will be leveraged to provide project-based assistance to these low-income units, making them available to households who have disabling conditions.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

The Consortium will leverage HOME-ARP funds to:

- Acquire rental housing units to house homeless households using a Permanent Supportive Housing (PSH) approach. Services will be provided using other funding sources.
- Produce new construction of affordable units, with 2- and 3-bedrooms, to house families and individuals experiencing homelessness.
- Produce rental housing for households who are at risk of homelessness and/or at greatest risk of housing instability. Section 811 PRA will be leveraged to provide project-based rental assistance to extremely low-income persons with disabilities. These vouchers will be utilized in the 30% of the total number of rental units assisted with HOME-ARP funds restricted for low-income households.

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For

example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.

For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ’s HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires

a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

Based on results of consultation, public comments, and the needs assessment and gaps analysis the Consortium will establish preferences for homeless (QP1); at risk of homelessness (QP2) and other populations at greatest risk of housing instability (QP4), particularly households with annual income that is less than or equal to 30% of AMI and are experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs); however, all four qualifying populations will have access to HOME-ARP rental housing. The Consortium will establish different preferences for specific projects as they are identified.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The needs assessment and gaps analysis indicated a particular need for affordable housing for people experiencing homelessness, those at risk of homelessness, and households who have incomes at or below 50% AMI and are severely cost burdened.

As discussed in earlier sections, the greatest needs for each QP are:

QP1: housing units with supportive services for people who cannot access existing housing and/or vouchers.

QP2: access to affordable housing units serving people at risk of homelessness who are at or below 30% AMI.

QP3: adequate transitional housing or rapid rehousing programming.

QP4: the creation of affordable housing units.

There is a critical need for affordable housing for all four Qualifying Populations, particularly those experiencing homelessness, at risk of homelessness and those at greatest risk of housing instability. The use of these preferences and methods of prioritization will address the demonstrated unmet needs in the region.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services,

admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

- 1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;***
- 2. the CE does not include all HOME-ARP qualifying populations; or,***
- 3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE.***

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ must include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

No single source of referral will be used in any HOME-ARP rental housing project. In order to facilitate access to all eligible QPs, housing developed with HOME-ARP funds will accept referrals from multiple sources. Proposed rental housing projects are either specifically tied to homelessness or target households with AMI below 50% (regardless of homelessness status).

For projects associated with QP1 and QP3 (specifically those experiencing homelessness): the Consortium will work closely with municipal courts, homeless outreach providers, and others to identify eligible households. A waitlist will be used if necessary.

For projects associated with QP2 and QP4: The Consortium will be implementing processes that are in alignment with the Fair Housing Act and utilize waitlists and referrals from nonprofits. These efforts will be affirmatively marketed.

As indicated above, preference will be given to QP1, QP2, and QP4, however all QPs will have access.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

The Consortium does not intend to utilize the CE process established by the CoC.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

The Boulder-Broomfield Consortium does not intend to utilize the CE process established by the CoC.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

The Boulder-Broomfield Consortium does not intend to utilize the CE process established by the CoC.

Limitations in a HOME-ARP rental housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

Based on consultation with local providers, the Boulder-Broomfield Consortium has determined not to limit eligibility for rental housing developed with HOME ARP funding to a particular qualifying population.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

N/A

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

N/A

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

The Boulder-Broomfield Consortium does not plan to utilize HOME-ARP funds to refinance existing debt secured by multifamily rental housing. Therefore, it has not prepared Refinancing Guidelines pursuant to HOME-ARP.

Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity.

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 qualified populations for the minimum compliance period can be demonstrated.

N/A

State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.

N/A

Specify the required compliance period, whether it is the minimum 15 years or longer.

N/A

State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

N/A

Other requirements in the PJ's guidelines, if applicable:

N/A

Appendix A: Surveys

General Public Survey

We are interested in hearing your thoughts on the unmet needs and challenges facing the qualifying populations to inform the use of HOME-ARP funding. Thank you for taking the time to participate in this survey. It will take about 5 minutes to complete. The survey will close February 20, 2023, at 5pm.

Head of household type:

- Single
- Married
- Single parent male head of household
- Single parent female head of household
- Single parent nonbinary head of household
- Single parent gender fluid head of household
- Disabled
- Senior/elderly 55+

Indicate primary ethnicity:

- Hispanic
- Non-Hispanic

Indicate primary race:

- American Indian/Alaska Native
- Native Hawaiian/Pacific Islander
- Asian
- Caucasian
- Black/African American
- Other
- Prefer not to answer

Which of the HOME-ARP qualifying populations do you identify?

Select all that apply:

- I am currently, experiencing homelessness
- I have previously experienced homelessness
- I am at risk of homelessness
- I am fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.
- Need supportive services that would help me avoid homelessness or housing instability
- Renter
- Work for organization that develops/supports affordable housing
- Work for organization that provides supportive services
- Other _____
- None

Please rank the following priority needs with 1 being the highest and 4 being the lowest:

_____ **Supportive Services:** Housing Counseling, landlord/tenant rights, housing search, budgeting, credit education/repair, etc. (does not include first time home buyer or foreclosure counseling, Homelessness Prevention Services, Job Readiness, Life Skills Training, Case Management Services.

_____ **Acquisition and Development of Non-Congregate Shelter(s):** Scattered Sites Hotel/Motel Rooms, Conversion of Existing Shelters (Congregate to Non-Congregate setting), Acquiring Existing Buildings for Use as Non-Congregate Shelter.

_____ **Tenant Based Rental Assistance (TBRA):** rental assistance, security deposits, utility deposits, and utility payments.

_____ **Development and Support of Affordable Housing** (including rehab of existing units): Assistance for Landlords, Permanent Supportive Housing, Creating New Affordable Housing Units, Rehab of Existing Units.

For supportive services, what needs do you see in the community? How do you think the funds could be used to address those needs?

For non-congregate shelter, what specific needs to you see in the community? How do you think the funds could be used to address those needs?

For tenant-based rental assistance, what specific needs to you see in the community? How do you think the funds could be used to address those needs?

For development of affordable housing, what needs do you see in the community? How do you think the funds could be used to address those needs?

What are the barriers to finding housing in your city that you have experience or observed? Select all that apply.

- Cost of housing
- Refusal of landlords to accept rental subsidy assistance
- Condition of housing units
- Accessibility for people with disabilities or disabling conditions
- Lack of housing near areas of opportunity (employment, services, education, etc.)
- Affordable housing options available only in certain areas
- Lack of diversity of housing options (such as tiny homes, single-family houses, apartments, and townhouses)
- All of the above
- None of the above
- Other (please specify): _____

What support services do you believe are the most needed to support housing needs?

What could local agencies do to make these services more accessible to people who need them?

What ideas do you have to help reduce and prevent homelessness?

Is there anything else you would like to add related to HOME-ARP funding?

Community Partner Survey

We are interested in hearing your thoughts on the unmet needs and challenges facing the qualifying populations to inform the use of HOME-ARP funding. Thank you for taking the time to participate in this survey. It will take about 5 minutes to complete. The survey will close February 20, 2023, at 5pm.

How long has your organization been operating in the service area?

What type of organization best describes your affiliation? **Select all that apply:**

- Housing Authority
- Organization addressing needs of people experiencing homelessness
- Emergency/Temporary Shelter Provider
- Supportive Services Provider
- Housing Provider/Landlord/Property Manager
- Domestic Violence Service Provider
- Veterans Group
- Fair Housing Organization
- Organization serving people with disabilities
- Affordable Housing Developer
- Government Agency
- Minority Owned Business
- Women Owned Business
- Section 3
- Other _____

Please rank the following priority needs with 1 being the highest and 4 being the lowest:

_____ **Supportive Services:** Housing Counseling, landlord/tenant rights, housing search, budgeting, credit education/repair, etc. (does not include first time home buyer or foreclosure counseling, Homelessness Prevention Services, Job Readiness, Life Skills Training, Case Management Services.

_____ **Acquisition and Development of Non-Congregate Shelter(s):** Scattered Sites Hotel/Motel Rooms, Conversion of Existing Shelters (Congregate to Non-Congregate setting), Acquiring Existing Buildings for Use as Non-Congregate Shelter.

_____ **Tenant Based Rental Assistance (TBRA):** rental assistance, security deposits, utility deposits, and utility payments.

_____ **Development and Support of Affordable Housing** (including rehab of existing units): Assistance for Landlords, Permanent Supportive Housing, Creating New Affordable Housing Units, Rehab of Existing Units.

For supportive services, what needs do you see in the community? How do you think the funds could be used to address those needs?

For non-congregate shelter, what specific needs do you see in the community? How do you think the funds could be used to address those needs?

For tenant-based rental assistance, what specific needs do you see in the community? How do you think the funds could be used to address those needs?

For development of affordable housing, what needs do you see in the community? How do you think the funds could be used to address those needs?

What unmet housing and services needs do you see among qualifying populations?

What gaps do you see within the current shelter and housing inventory?

HOME - ARP funding is a one-time opportunity to create programs/services that would have a significant impact on reducing/ending homelessness in this community. Are there other eligible uses of this funding that were not specifically asked about that you think should be considered for potential funding?

Is there anything else you would like to add related to HOME-ARP funding?

APPENDIX B: Vacancy Rate 4Q 2022



APARTMENT TRENDS[®] SUMMARY

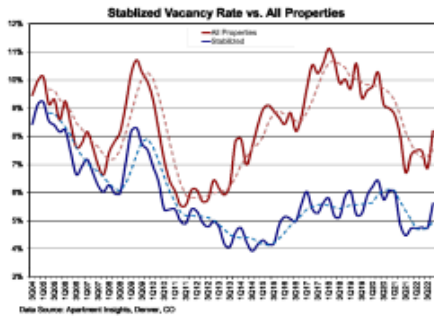
Metropolitan Denver 50+ Unit Apartment Properties

Fourth Quarter 2022

↑ VACANCY: 5.61%

Vacancy in stabilized conventionally operated properties increased 86 basis point (bps) from last quarter's 4.75% to 5.61% during the 4th quarter. The current vacancy is 89 bps higher than 12 months ago and is at the highest level in seven quarters. The trailing four-quarter average vacancy increased 22 bps from last quarter to 4.96%, but it is 6 bps lower than 12 months ago.

The overall vacancy rate, which includes both stabilized properties and properties in lease-up, increased by a sizable 132 bps during the quarter to 8.19%. This is 85 bps higher than a year ago.



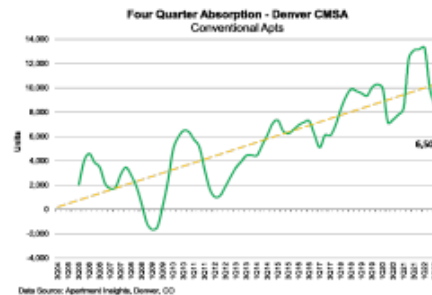
Areas: The Boulder South (BOS) submarket reported the lowest vacancy this quarter of any submarket at 2.85%. Denver Southwest (DSW) had the second lowest rate at 3.47% while Commerce City (COM) came in third at 3.78%. The Denver Central Business District (CBD) had the highest vacancy rate, increasing 131 bps to 6.98%. There were five districts with vacancy higher than 6% this quarter. Those five districts saw rents decrease an average of 3.1% during the quarter.

Tax credit: Vacancy in tax credit properties increased 48 bps this quarter to 2.72%. This is 33 bps higher than a year ago. The current average tax credit rent of \$1,172 is 9.6% higher than 12

months earlier. There was a gain of 310 occupied apartments during the quarter, and 1,437 units for the year.

↓ ABSORPTION: -252

There was an overall loss in the number of occupied conventional apartments during the quarter, as absorption came in at -252 units. This was quite a change from the previous quarter's strong gain of 3,106 units, and the first negative figure in 11 years. As a result, the trailing 12-month total absorption decreased from last quarter's 8,480 to 6,457 units this quarter. This is the slowest annual absorption in 21 quarters, or since the 3rd quarter of 2017.



When all types of apartments are included (tax credit and student), there was a quarterly gain of 448 occupied units, mostly in tax credit properties. The annual total absorption decreased 16% from 10,240 apartments last quarter to 8,603 this quarter.

Areas: The CBD had the largest gain during the quarter, absorbing 151 units, while Denver Southeast (DSE) posted the largest decline of 117 occupied apartments.

↓ RENTS: \$1,864 per Unit \$2.14 per Sq. Ft.

The metro Denver average rent decreased for the first time in two years, and by \$33 during the

APPENDIX C: Boulder-Broomfield HOME Consortium Public Participation Documentation

2021 HOME ARP Allocation Plan

The Boulder-Broomfield Consortium requested comments on their 2021 HOME ARP Allocation Plan. Announcements for all comment periods and all public hearings were made through local newspapers and websites.

Dates of public notices: October 30, 2022; February 3, 2023 (Boulder and Broomfield), February 5, 2023, April 22, 2023, April 23, 2023 and April 26, 2023.

The Boulder-Broomfield Consortium accepted comments during the following periods:

- November 1-15, 2022 (15 days) – Boulder
- February 3-20, 2023 (17 days) – Longmont
- February 3-20, 2023 (17 days) – Boulder
- February 5-20, 2023 (15 days) – Broomfield
- April 22-May 23, 2023 (30 days) - Boulder
- April 23-May 24, 2023 (30 days) - Broomfield
- April 25-May 26, 2023 (30 days) - Longmont

The Boulder-Broomfield Consortium held a virtual public hearing on Tuesday, November 15, 2022, at 1:00pm. Publisher's affidavits are attached.

Boulder-Publisher's Affidavit

**NOTICE OF PUBLIC COMMENT OPPORTUNITY ON
Draft 2021 HOME Investment Partnerships
American Rescue Plan Program
(HOME-ARPP)
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 2021 HOME Investment Partnerships American Rescue Plan Program (HOME-ARPP). The 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 Affordable Housing Investments.

A 15-day public comment period will begin on Tuesday, November 1, 2022. All residents are encouraged to submit written comments or questions by 5:00 pm, on Tuesday, November 15, 2022 to Corina Martin, City of Boulder Housing SE Program Manager, at P.O. Box 791, Boulder, Colorado 80306, (303) 441-4134 or martin@bouldercolorado.gov.

Copies of the HOME ARPP Action Plan Amendment will be made available upon request and are free of charge. Upon request, this document will also be made available to non-English speaking persons and persons with disabilities. Per federal requirements, the public will have 15 days in which to comment on the report before it is submitted to HUD. All comments received will be responded to in writing and will be included in the submission to HUD.

Notice of Nondiscrimination

The City of Boulder, Department of Housing & 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 & 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 October 30, 2022-1531699

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):

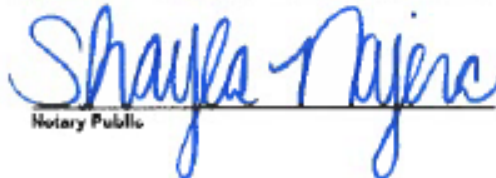
Oct 30, 2022



Signature

Subscribed and sworn to me before me this:

31st day of October 2022



Notary Public

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

(SEAL)

Account:	1052017
Ad Number:	1931699
Fee:	\$61.00

Longmont-Publisher's Affidavit

NOTICE OF PUBLIC COMMENT OPPORTUNITY ON
2021 HOME Investment Partnerships American Rescue
Plan Program
(HOME-ARP)
Boulder-Broomfield Regional HOME Consortium

In the interest of enhancing citizen participation, the City of Longmont and the Boulder Broomfield Regional Consortium request comments on their 2021 HOME Investment Partnerships American Rescue Plan Program (HOME-ARP). The draft plan describes the Consortium's intended use of the HOME-ARP funds as required in HUD Notice CPD-21-10, and a copy is available for public review at <https://www.longmontcolorado.gov/departments/departments-e-m/housing-and-community-investment>.

A 15-day public comment period will begin Friday February 3, 2023. All residents are encouraged to submit written comments or questions by 5:00 pm, on Monday February 26, 2023 to Deb Calles, City of Longmont Housing and Community Investment Manager, at 350 Kimbark St, Longmont, CO 80501 (303) 651-8736, or to Deborah Calles at deborah.calles@longmontcolorado.gov. An online survey is also available on the City of Boulder's website: <https://boulder.colorado.gov/services/affordable-housing-investments>. Copies of the HOME ARP Action Plan Amendment will be made available upon request and are free of charge. Upon request, this document will also be made available to non-English speaking persons and persons with disabilities. Per federal requirements, the public will have 15 days in which to comment on the report before it is submitted to HUD. All comments received will be responded to in writing and will be included in the submission to HUD. If you have a disability or are non-English speaking and require accommodations to participate in public comment, please contact the Longmont Housing and Community Investment Division as early as possible at (303) 651-8464.

Para información en español, puede llamar a Diana al (303) 651-8464. TDD/TTY communication is available via the Colorado Relay system at 1-800-629-3656.

AVISO DE OPORTUNIDAD DE COMENTARIOS PÚBLICOS SORGE
Programa del Plan de Rescate Americano de Asociaciones de
Inversión HOME 2021 (HOME-ARP) Consorcio Regional HOME de
Boulder-Broomfield

Con el interés de mejorar la participación ciudadana, la Ciudad de Longmont y el Consorcio Regional de Boulder - Broomfield solicitan comentarios sobre su Programa del Plan de Rescate Americano de Asociaciones de Inversión HOME 2021 (HOME-ARP). La copia preliminar del plan describe el uso previsto por parte del Consorcio de los fondos de HOME-ARP como se requiere en el Aviso CPD-21-10 de HUD, y una copia está disponible para revisión pública en <https://www.longmontcolorado.gov/departments/departments-e-m/housing-and-community-investment>.

Un período de comentarios públicos de 15 días comenzará el viernes 3 de febrero del 2023. Se da aliento a todos los residentes a enviar comentarios o preguntas por escrito antes de las 5:00 pm, el lunes 20 de febrero del 2023 a Deb Calles, Gerente de Vivienda e Inversión Comunitaria de la Ciudad de Longmont, en 350 Kimbark St, Longmont, CO 80501 (303) 651-8736, o por correo electrónico a deborah.calles@longmontcolorado.gov.

Una encuesta en línea también está disponible en el sitio web de la Ciudad de Boulder: <https://boulder.colorado.gov/services/affordable-housing-investments>. Las copias de la Revisión del Plan de Acción de HOME-ARP estarán disponibles a pedido y son gratuitas. Previa solicitud, este documento también se pondrá a disposición de las personas que no hablan inglés y las personas con discapacidad. Según los requisitos federales, el público tendrá 15 días para comentar sobre el informe antes de que se envíe a HUD. Todos los comentarios recibidos serán respondidos por escrito y se incluirán en la presentación a HUD.

Si usted tiene una discapacidad o no habla inglés y necesita adaptaciones para participar en comentarios públicos, comuníquese con la División de Vivienda e Inversión Comunitaria de Longmont lo antes posible al (303) 651-8464.

Para información en español, puede llamar a Diana al (303) 651-8464. La comunicación TDD/TTY está disponible a través del sistema Colorado Relay al 1-800-629-3656.

Published: Longmont Times Call February 3, 2023-1952837

Prairie Mountain Media, LLC

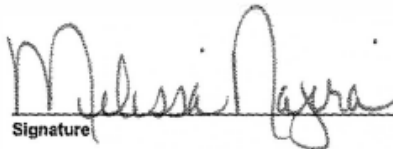
PUBLISHER'S AFFIDAVIT

County of Boulder
State of Colorado

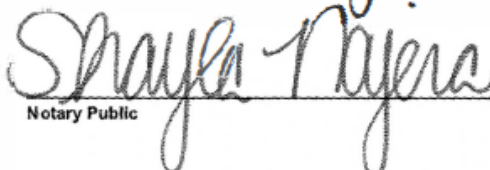
The undersigned, Agent, being first duly sworn under oath, states and affirms as follows:

1. He/she is the legal Advertising Reviewer of Prairie Mountain Media LLC, publisher of the Longmont Times Call.
2. The Longmont Times Call 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 Longmont Times Call in Boulder County on the following date(s):

Feb. 3, 2023


Signature

Subscribed and sworn to me before me this
3rd day of February, 2023


Notary Public

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

(SEAL)

Boulder-Publisher's Affidavit

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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 2021 HOME Investment Partnerships American Rescue Plan Program (HOME-ARP). The draft plan describes the Consortium's intended use of the HOME ARP funds as required in HUD Notice CPD-21-18, and a copy is available for public review at <https://bouldercolorado.gov/services/affordable-housing-investments>.

A 15-day public comment period will begin on Friday, February 3, 2023. All residents are encouraged to submit written comments or questions by 5:00 pm, on Monday, February 20, 2023 to Corina Marin, City of Boulder Housing Sr Program Manager, at P.O. Box 799, Boulder, Colorado 80506, (303) 441-4134, or to marinc@bouldercolorado.gov. An online survey is available on the city's website: <https://bouldercolorado.gov/services/affordable-housing-investments>.

Copies of the HOME ARP Action Plan Amendment will be made available upon request and are free of charge. Upon request, this document will also be made available to non-English speaking persons and persons with disabilities. Per federal requirements, the public will have 15 days in which to comment on the report before it is submitted to HUD. All comments received will be responded to in writing and will be included in the submission to HUD.

Notice of Nondiscrimination
The City of Boulder, Department of Housing & 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 & 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 February 3, 2023-1953460

Prairie Mountain Media, LLC

PUBLISHER'S AFFIDAVIT

**County of Boulder
State of Colorado**

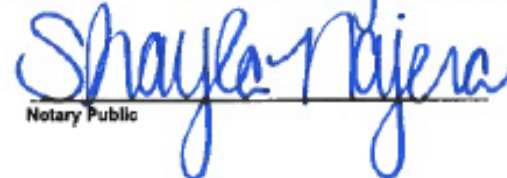
The undersigned, Agent, being first duly sworn under oath, states and affirms as follows:

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):

Feb. 3, 2023


Signature

Subscribed and sworn to me before me this
3rd day of February, 2023


Notary Public

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

(SEAL)

Account: 1052017
Ad Number: 1953460
Fee: \$84.68

Broomfield-Publisher's Affidavit

**NOTICE OF PUBLIC COMMENT OPPORTUNITY
CITY AND COUNTY OF BROOMFIELD
2021 HOME Investment Partnerships American Rescue Plan Program (HOME-ARP)**

Boulder-Broomfield Regional HOME Consortium in the interest of enhancing citizen participation, the City of Boulder, Boulder County, City and County of Broomfield and the Boulder Broomfield Regional Consortium request comments on their 2021 HOME Investment Partnerships American Rescue Plan Program (HOME-ARP). The draft plan describes the Consortium's intended use of the HOME ARP funds as required in HUD Notice CPD-21-10, and a copy is available for public review at <https://boulder.colorado.gov/services/affordable-housing-investments>.

A 15-day public comment period will begin on Sunday, February 5, 2023. All residents are encouraged to submit written comments or questions by 5:00 pm, on Monday, February 20, 2023, to Sharon Tessier, City of Broomfield Housing Program Manager at One DesCombes Drive, Broomfield, Colorado 80020, or call (303) 441-4134, or email stessier@broomfield.org

An online survey is also available on the city's Housing Division website: <https://www.broomfield.org/270/Housing-Division>

Para obtener información sobre este Aviso público en español, envíe un correo electrónico a vdelpiz20@broomfield.org. Una encuesta está disponible en nuestro website, para la versión en Español, visite: <https://www.broomfield.org/270/Housing-Division>

Copies of the HOME ARP Action Plan Amendment will be made available upon request and are free of charge. Upon request, this document will also be made available to non-English speaking persons and persons with disabilities. Per federal requirements, the public will have 15 days in which to comment on the report before it is submitted to HUD. All comments received will be responded to in writing and will be included in the submission to HUD.

Notice of Nondiscrimination
The City and County of Broomfield, Housing Division 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 & Human Services will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs or activities.

Published: Broomfield Enterprise February 5, 2023-1953586

Prairie Mountain Media, LLC

PUBLISHER'S AFFIDAVIT

**County of Broomfield
State of Colorado**

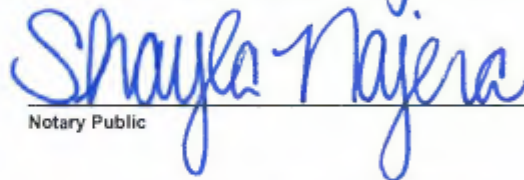
The undersigned, Agent, being first duly sworn under oath, states and affirms as follows:

1. He/she is the legal Advertising Reviewer of Prairie Mountain Media LLC, publisher of the *Broomfield Enterprise*.
2. The *Broomfield Enterprise* is a newspaper of general circulation that has been published continuously and without interruption for at least fifty-two weeks in Broomfield 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 *Broomfield Enterprise* in Broomfield County on the following date(s):

Feb 5, 2023


Signature

Subscribed and sworn to me before me this
6th day of February 2023


Notary Public

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

(SEAL)

Account: 1099532
Ad Number: 1953586
Fee: \$67.32

Boulder-Publisher's Affidavit

**NOTICE OF PUBLIC COMMENT OPPORTUNITY ON
2021 HOME Investment Partnerships American Rescue Plan
Program (HOME-ARP)
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 2021 HOME Investment Partnerships American Rescue Plan Program (HOME-ARP). The draft plan describes the Consortium's intended use of the HOME ARP funds as required in HUD Notice CPD-21-10, and a copy is available for public review at

<https://bouldercolo.gov/services/affordable-housing-investments>.

A 30-day public comment period will begin on Saturday, April 22, 2023. All residents are encouraged to submit written comments or questions by 5:00 pm, on Tuesday, May 23, 2023 to Corina Marin, City of Boulder, Grants Administrator, at P.O. Box 791, Boulder, Colorado 80306, (303) 441-4134, or to marino@bouldercolorado.gov. Copies of the HOME ARP Action Plan Amendment will be made available upon request and are free of charge. Upon request, this document will also be made available to non-English speaking persons and persons with disabilities. Per federal requirements, the public will have 30 days in which to comment on the report before it is submitted to HUD. All comments received will be responded to in writing and will be included in the submission to HUD.

Notice of Nondiscrimination

The City of Boulder, Department of Housing & 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 & 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 22, 2023-1971262

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 22, 2023

Shayla Najera
Signature

Subscribed and sworn to me before me this
24th day of April 2023

Melissa L Najera
Notary Public

**MELISSA L NAJERA
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20064049936
MY COMMISSION EXPIRES DEC. 11, 2026**

(SEAL)

Account: 1052017
Ad Number: 1971262
Fee: \$60.28

Broomfield-Publisher's Affidavit

**NOTICE OF PUBLIC COMMENT OPPORTUNITY ON
2021 HOME Investment Partnerships American Rescue Plan Program
(HOME-ARP)**

Boulder-Broomfield Regional HOME Consortium

In the interest of enhancing citizen participation, the City of Boulder, Boulder County, City and County of Broomfield and the Boulder Broomfield Regional Consortium request comments on their 2021 HOME Investment Partnerships American Rescue Plan Program (HOME-ARP). The draft plan describes the Consortium's intended use of the HOME ARP funds as required in HUD Notice CPD-21-10, and a copy is available for public review at <https://bouldercolorado.gov/services/affordable-housing-investments>.

A 30-day public comment period will begin on Sunday, April 23, 2023. All residents are encouraged to submit written comments or questions by 5 p.m. on Wednesday, May 24, 2023 to Sharon Tessler, City of Broomfield Housing Program Manager at One DeSCombes Drive, Broomfield, Colorado 80020, or call 303-441-4134, or email stessler@broomfield.org.

Copies of the HOME ARP Action Plan Amendment will be made available upon request and are free of charge. Upon request, this document will also be made available to non-English speaking persons and persons with disabilities. Per federal requirements, the public will have 30 days in which to comment on the report before it is submitted to HUD. All comments received will be responded to in writing and will be included in the submission to HUD.

Notice of Nondiscrimination

The City and County of Broomfield, Housing Division does not discriminate on the basis of race, color, religion, gender, age, national origin, disability, marital status, familial status, sexual orientation or marital 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 & Human Services will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs or activities.

Published: Broomfield Enterprise April 23, 2023-1971319

Prairie Mountain Media, LLC

PUBLISHER'S AFFIDAVIT

**County of Broomfield
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 *Broomfield Enterprise*.
2. The *Broomfield Enterprise* is a newspaper of general circulation that has been published continuously and without interruption for at least fifty-two weeks in Broomfield 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 *Broomfield Enterprise* in Broomfield County on the following date(s):

Apr 23, 2023

Shayla Najera
Signature

Subscribed and sworn to me before me this

24th day of April 2023

Melissa L Najera
Notary Public

(SEAL)

**MELISSA L NAJERA
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20064049936
MY COMMISSION EXPIRES DEC. 11, 2026**

Account: 1099532
Ad Number: 1971319
Fee: \$62.92

Longmont-Publisher's Affidavit

**NOTICE OF PUBLIC COMMENT OPPORTUNITY ON
Draft 2021 HOME Investment Partnerships American Rescue Plan
Program (HOME-ARP)
Boulder-Broomfield Regional HOME Consortium**

In the interest of enhancing citizen participation, the City of Longmont, and the Boulder/Broomfield Regional Consortium request comments on their 2021 HOME Investment Partnerships American Rescue Plan Program (HOME-ARP). The draft plan describes the Consortium's intended use of the HOME ARP funds as required in HUD Notice CPO-21-10, and a copy is available for public review at <https://www.longmontcolorado.gov/departments/departments-h-m/housing-and-community-investment>

A 30-day public comment period will begin on Wednesday, April 26, 2023. All residents are encouraged to submit written comments or questions by 5:00 pm, on Friday, May 26, 2023 to Deb Callies, City of Longmont Housing and Community Investment Manager, at 350 Kimbark St, Longmont, CO 80501 (303) 651-8736, or to Deborah.callies@longmontcolorado.gov. Copies of the HOME ARP Action Plan Amendment will be made available upon request and are free of charge. Upon request, this document will also be made available to non-English speaking persons and persons with disabilities. Per federal requirements, the public will have 30 days in which to comment on the report before it is submitted to HUD. All comments received will be responded to in writing and will be included in the submission to HUD. If you have a disability or are non-English speaking and require accommodations to participate in public comment, please contact the Longmont Housing and Community Investment Division as early as possible at (303) 651-8444.

Para información en español, puede llamar a Diana al (303) 651-8444. TDD/TTY communication is available via the Colorado Relay system at 1-800-659-3056.

Published: Longmont Times Call April 26, 2023-1971274

Prairie Mountain Media, LLC

PUBLISHER'S AFFIDAVIT

**County of Boulder
State of Colorado**

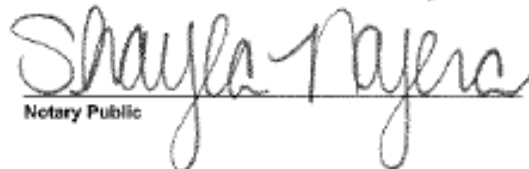
The undersigned, Agent, being first duly sworn under oath, states and affirms as follows:

1. He/she is the legal Advertising Reviewer of Prairie Mountain Media LLC, publisher of the *Longmont Times Call*.
2. The *Longmont Times Call* 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 *Longmont Times Call* in Boulder County on the following date(s):

Apr 26, 2023


Signature

Subscribed and sworn to me before me this
21st day of April, 2023


Notary Public

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

(SEAL)

Account: 1050968
Ad Number: 1971274
Fee: \$38.57

APPENDIX D: SF424's and Certifications

OMB Number: 4040-0004
 Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: 10/05/2022	4. Applicant Identifier: 95-74500	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: M-21-DP-08-0202	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: City of Boulder		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 84-6000566	* c. UEI: RHKAEF3C4CK8	
d. Address:		
* Street1:	P.O. BOX 791	
Street2:	<input type="text"/>	
* City:	Boulder	
County/Parish:	<input type="text"/>	
* State:	CO: Colorado	
Province:	<input type="text"/>	
* Country:	USA: UNITED STATES	
* Zip / Postal Code:	80306-0791	
e. Organizational Unit:		
Department Name: Housing & Human Services	Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>	* First Name: Eli	
Middle Name: <input type="text"/>		
* Last Name: Urken		
Suffix: <input type="text"/>		
Title: Housing Investment Manager		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 303-441-4142	Fax Number: <input type="text"/>	
* 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 Partnership

*** 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:**

Provide housing, rental assistance, supportive services, and non-congregate shelter to reduce homelessness & increase housing stability for populations at greatest risk of homelessness.

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="4,256,840.00"/>
* 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="4,256,840.00"/>

*** 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 - NON-CONSTRUCTION PROGRAMS

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 (0348-0040), 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 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 cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. 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.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for 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).
6. Will comply with all Federal statutes relating to nondiscrimination. 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.
7. 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 or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with 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.

9. 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.
10. Will comply, if applicable, 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.
11. 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).
12. 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.
13. 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.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. 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.
17. 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."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. 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 10/6/2022

Standard Form 424B (Rev. 7-97) Back

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.


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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 <input type="text" value="City Manager, City of Boulder, CO"/>
APPLICANT ORGANIZATION <input type="text" value="City of Boulder"/>	DATE SUBMITTED <input type="text" value="10/6/2022"/>

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HOME-ARP CERTIFICATIONS

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

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

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 will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.


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 and program requirements.

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.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official

10/6/2022
Date

City Manager

Title