



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 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 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)	Fair Housing	Email and survey	Senior housing, service needs, development, homeless services
Metro Denver Homeless Initiative (MDHI)	Regional Continuum of Care (CoC)	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	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	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	Email and video conferencing	Development
Almost Home	Non-Congregate Sheltering	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	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	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	Meetings, email, survey	Project development, housing, service needs
Emergency Family Assistance Association (EFAA)	Nonprofit, homeless services provider	Meetings, email	Service needs
Safe Shelter of St. Vrain Valley	Homeless Shelter Services	Virtual, one on one, email	Project development, homeless housing
TGTHR	Youth Homeless Services	Virtual, one on one, email	Project development transitional housing
The Inn Between of Longmont	Nonprofit, homeless services provider	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 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 D: Boulder-Broomfield HOME Consortium Public Participation Documentation)

- ***Date(s) of public notice:*** October 30, 2022; February 3, 2023 (two notices), and February 5, 2023

- **Public comment periods:** November 1, 2022 - November 15, 2022, February 3 - February 20, 2023 (Boulder and Broomfield), and February 5 – February 20, 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. 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 that included 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, it was 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 housing is needed 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).

Themes that emerged were prevention services for the homeless 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.

There were two additional themes that emerged regarding limited housing options for seniors and people with IDD. There is a shortage for households living on fixed incomes, such as seniors and people with disabilities. 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.

Needs Assessment and Gaps Analysis

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. Since the Consortium did not have a preference in populations, there was not a specific breakdown by special populations.

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.

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													

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

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.

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

Homeless as defined in 24 CFR 91.5

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.

The 2022 Point in Time Count reflected 457 unhoused people in Boulder County and 86 unhoused people in Broomfield County. Due to the significant under-representation of people of color in the general population, people of color, particularly indigenous persons, are over-represented in homelessness. While percentages of people are skewed by small sample size, the Consortium strives to address inequities and assesses all new programs and services through an equity lens.

The 2022 PIT Count reported 543 individuals experiencing homelessness (PEH) within Boulder and Broomfield counties. The largest percentage of people experiencing homelessness were white, however Native Americans/Alaska Natives were overrepresented by 14.75x in Broomfield and 3.8 in Boulder County. Overall, Black or African Americans were overrepresented by 9.7x and multi-racial were overrepresented by 4.3x.

People experiencing homelessness (PEH) 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 with significant barriers to housing stability such as mental health issues and substance use issues. 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.

At Risk of Homelessness as defined in 24 CFR 91.5

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.

As identified in the Consortium's 2020-2024 Consolidate Plan, 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. 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. There is also a shortage of homes to buy priced at less than \$375,000. The regions housing subsidies that assist approximately 1,500 people with disabilities, many of whom are older adults, 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 homelessness prevention needs and homelessness services.

The primary housing characteristic in the Consortium area affecting 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.

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 indicate an overall shortage of affordable housing putting this population at 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.

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

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.

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.

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.

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.

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):

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).

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.

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.

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

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.

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 with lengthy criminal histories, 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.

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.

At Risk of Homelessness as defined in 24 CFR 91.5

As average rents continue to rise, the number of individuals at risk of losing housing also continues to rise. Individuals with disabilities, fixed incomes, and families are often most significantly impacted by rising rental costs. 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.

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.

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.

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.

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.

Resources would be allocated to work with individuals experiencing homelessness who are at greater risk of being denied housing opportunities due to criminal background issues. In addition, populations served are diverse and individuals who seek services are disenfranchised for many different reasons that result in a greater risk for housing instability.

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 >40% AMI continues to be the most needed housing resource in the region. Current data (Appendix C: 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:

- Neuro-diverse
- Intellectual and Developmental Disabilities (IDD)
- Individuals with criminal backgrounds

Identify priority needs for qualifying populations:

Priority needs remain consistent with those identified on the Boulder-Broomfield HOME Consortium 2020-2024 ConPlan. There is a critical need for affordable housing for low-income households, particularly those living on fixed incomes, such as seniors and individuals with disabilities. There is a gap in assistance with housing navigation, rental assistance, and other financial supportive services (i.e. security deposits, utility deposits, and utility payments).

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:

Boulder and Broomfield have a sophisticated data collection and service provision model. Through our coordinated efforts, we have successfully exited over 1,500 people from homelessness since late 2017. However, through consultation with stakeholders, it has been identified that the demand for housing and supportive services continues to grow as aligned with national trends. As such, the community is faced with a housing deficit.

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.

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.

At the close of the application process, projects will be reviewed for completeness, eligibility and ability to deliver on the priority areas identified. Awards will be made based on the project scope as it pertains to HOME ARP requirements using scoring criteria developed by the Consortium (Appendix B: HOME ARP Projects Criteria). In addition, awards will be based on the applicant’s ability to comply with all federal and local requirements. The projects will be sent to City Council for funding approval.

Describe whether the PJ will administer eligible activities directly:

The Boulder-Broomfield Consortium members will administer the eligible activities through their subrecipients/contractors. Individual Consortium members with projects in their specific jurisdiction will be responsible for the administration of any project within their specific geographical boundary. Members will enter into a development agreement with the developer for any housing project, monitor the project and contractors for federal and local compliance, request compliance reports as needed, and provide the Consortium lead agency with verification of compliance.

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 public participation, community agency response, and stakeholder engagement, reflects the following priorities:

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

- Commit funds to support other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability in the Consortium area.

The Consortium will deliberate and take all feedback into consideration, in addition to ranking projects based on eligible criteria (Appendix B: HOME ARP Project 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 homelessness must include an increase in the Consortium’s housing inventory, in particular for persons experiencing homelessness, as well as those earning below 30% AMI. 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 permanent supportive housing needs. Shelters, including people experiencing chronic homelessness and those fleeing domestic violence, are seeing increased activity. While the community has made strides in increasing the number of affordable and supportive housing units, demand has consistently increased.

Project selection will focus primarily on increasing the inventory of housing units targeted as part of the overall community homelessness response, specifically subpopulations of people who face significant challenges in more traditional pathways to housing.

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 55 units can be created leveraging the HOME ARP funds for qualifying populations.

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 “hard-to-place” individuals who have experienced chronic homelessness with a Permanent Supportive Housing (PSH) approach.
- Produce new construction of affordable units, with 2- and 3-bedrooms, to house and provide supportive services to families and individuals experiencing homelessness.
- Produce rental housing for households with intellectual and developmental disabilities (IDD), seniors, neurodiverse populations, and those who experience a much higher risk of homelessness and housing instability.

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 the stakeholder engagement, the Consortium does not plan to prioritize preferences for projects for recipients of supportive services, however, consideration may be given to individuals experiencing homelessness, and/or individuals who are neurodiverse

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:

- No preferences identified.

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 order to facilitate access to all eligible populations, housing developed with HOME-ARP funds will accept referrals from multiple sources. The consortium will work closely with municipal courts, homeless outreach providers, and others to identify chronically homeless clients who are high utilizers of multiple systems (judicial, health care, detox, etc.) and would otherwise be very difficult to house.

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):

While the Consortium does coordinate many housing resources with the OneHome program (Continuum of Care Coordinated Entry), some portions of projects may have been designed to target specific subpopulations. As such, tailored referral efforts, based on an objective prioritization process, will be used, as determined by Homeless Solutions for Boulder County and/or the PJ.

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 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 City of Longmont follows a prioritization process based on the ongoing needs of their existing client base who meet the requirements of and need these services. Broomfield Housing Alliance (BHA) partners with local community organizations working with neuro-diverse and IDD populations who are either experiencing homelessness or are at risk of homelessness. Examples include Bal Swan Children's Center, Broomfield FISH, Inn Between, and the Refuge. This project will prioritize these populations to the extent permissible by fair housing laws.

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 Consortium has determined not to limit eligibility for rental housing developed with HOME ARP funding to a particular qualifying population. Victims of domestic violence, stalking, sexual harassment and human trafficking, persons experiencing homelessness, and homeless veterans are currently included in the referral process. Based on the current integration of services, there is no necessity to prioritize specific populations.

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:

The Consortium will not be implementing limitations on access to services or housing for special populations.

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 City of Fort Collins 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.

- N/A

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 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 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: HOME ARP Projects Criteria

Boulder-Broomfield Consortium: HOME ARP Projects Criteria

<ul style="list-style-type: none"> •Total Consortium Allocation \$4,256,840 •Net Amount Available for Activities: \$3,831,156 •12-Month Requirement to Commit Funds Has Been Waived •Expenditure of Funds/Project Completion by 9/30/2030 •HUD-identified goal: Primary: address homelessness Secondary: Increase housing stability •https://www.hudexchange.info/programs/home-arp/
Jurisdiction
Description
How does this program address homelessness?
What are the goals of the program?
In what stage of consideration is this proposal (i.e.; conceptual, design, identified partners, PJ approval, partially funded)?
Where will this project take place and who and how many people will it serve?
Max 10 points
Tenants Served/AMI Mix
People Served
Tenant Selection Plan Overview
Max 25 points
How is equity/accessibility being addressed?
Based on development design or tenant selection plan, what other populations will experience a burden (i.e., identities including race, ethnicity, age, gender, sexual orientation, disability)?
Based on development design or tenant selection plan, what other populations will experience a benefit (i.e., identities including race, ethnicity, age, gender, sexual orientation, disability)?
What strategies might mitigate or avoid unintended consequences for people of color or people experiencing inequities based on other personal identities?

Max 25 points
Timing
What challenges are anticipated regarding completion of the project by the HOME deadline?
Max 15 points
Fund leveraging
Max 25 points
Total 100 points
Proposed Funding Amount

APPENDIX C: Vacancy Rate 4Q 2022



APARTMENT TRENDS[®] SUMMARY

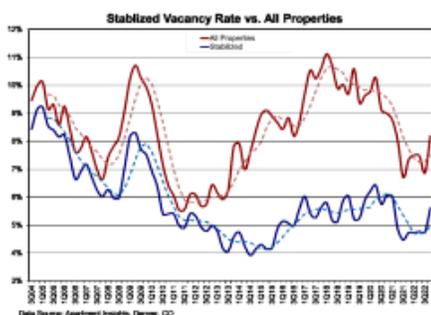
Metropolitan Denver 50+ Unit Apartment Properties

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.



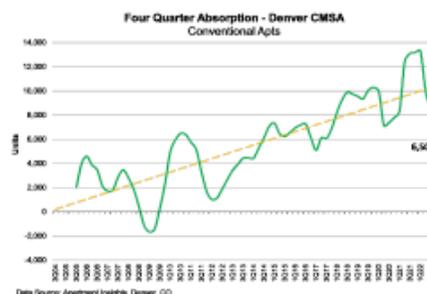
Areas: The Boulder South (BOS) submarket reported the lowest vacancy this quarter of any submarket at 2.85%. Denver Southwest (DSW) had the second lowest rate at 3.47% while Commerce City (COM) came in third at 3.78%. The Denver Central Business District (CBD) had the highest vacancy rate, increasing 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 D: Boulder-Broomfield HOME Consortium Public Participation Documentation

2021 HOME ARP Allocation Plan

The Boulder-Broomfield 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), and February 5, 2023

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

- November 1-15, 2022 (14 days) – Boulder
- February 3-20, 2023 (17 days) – Longmont
- February 3-20, 2023 (17 days) – Boulder
- February 5-20, 2023 (15 days) – Broomfield

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 Marin, City of Boulder Housing Sr Program Manager, at P.O. Box 791, Boulder, Colorado 80506, (303) 441-4134 or marinc@boulder.colorado.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 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 Non-Discrimination

The City of Boulder, Department of Housing & Human Services does not discriminate on the basis of race, color, religion, gender, age, marital status, disability, marital status, income 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**

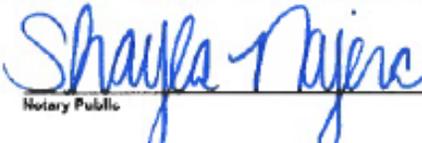
The undersigned, Agent, being first duly sworn under oath, states and affirms as follows:

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: 1031699
Fee: \$81.00

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-in/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@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 1-800-659-3656.

**AVISO DE OPORTUNIDAD DE COMENTARIOS PÚBLICOS SOBRE
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-in/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 26 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 1-800-659-3656.

Published Longmont Times Call February 3, 2023-1952837

Prairie Mountain Media, LLC

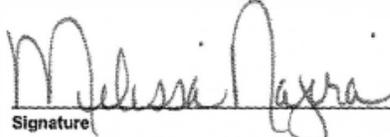
PUBLISHER'S AFFIDAVIT

County of Boulder
State of Colorado

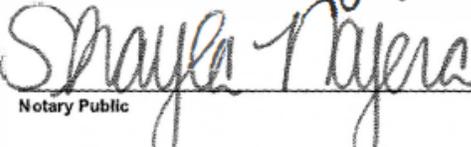
The undersigned, Agent, being first duly sworn under oath, states and affirms as follows:

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 20174031985
MY COMMISSION EXPIRES July 31, 2025**

(SEAL)

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://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 Corine Martin, City of Boulder Housing Sr Program Manager, at P.O. Box 791, Boulder, Colorado 80306, (303) 441-4134, or to marinc@bouldercolorado.gov. An online survey is available on the city's website at <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**

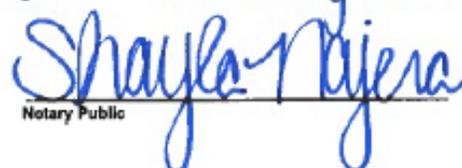
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3. The notice that is attached hereto is a true copy, published in the Daily Camera in Boulder County on the following date(s):

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**

(REAL)

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://bouldercolorado.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 vdelpizzo@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
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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

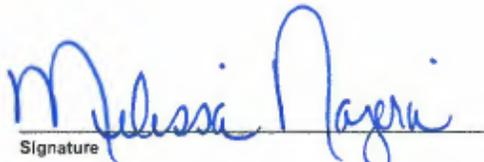
Prairie Mountain Media, LLC

**PUBLISHER'S AFFIDAVIT
County of Broomfield
State of Colorado**

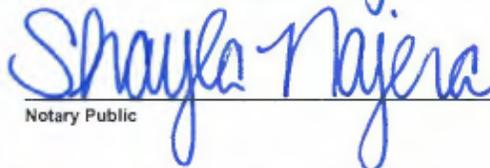
The undersigned, Agent, being first duly sworn under oath, states and affirms as follows:

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