CITY OF BOULDER 2024 CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT (CAPER)

CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a). This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

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

In 2024, the City of Boulder outcomes included the completion of several activities benefiting from CDBG funds from prior years, committed and planned investments.

City of Boulder activities benefiting from prior CDBG grant years included the completion (full expenditure) of public service activities benefiting Family Resource Schools (IDIS 770), economic development activities through the Colorado Enterprise Funds Microenterprise Program (IDIS 771), Boulder Shelter for the Homeless (IDIS 760), the Longmont Housing Rehab Program (IDIS 750), and CDBG administrative funds (IDIS 764).

Open activities include continued support of homeowner rehab activities through the Activities that were awarded funding and are expected to commence in 2025 include capital improvement projects for Boulder Shelter for the Homeless (IDIS 761) and Thistle Community Housing (IDIS 762), as well as Community Investment Programs through the Section 108 Loan to support the construction of the Affordable Housing Modular Factory (IDIS 742, 765 and 768).

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

City and County of Broomfield has successfully continued to use its HOME Funds to continue the (TBRA) Tenant Based Rental Assistance Program (IDIS 766), administered through the Department of Human Services.

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g). Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

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

Goal	Category	Source / Amount 5-YR Strategic Plan	Indicator	Unit of Measure	Expected - 5-YR Strategic Plan	Actual – 5-YR Strategic Plan	Percent Complete	Expected – Program Year (Jan1- Dec 31)	Actual – Program Year (Jan 1-Dec 31)	Percent Complete
Administration	Administration	CDBG: \$ 842,800 HOME: \$ 585,345 HOME-ARP: \$420,923	Other	Other	0	0	0	0	0	0
Community Investment Programs	Non-Housing Community Development	CDBG: \$1,269,401 HOME: \$100,000 Section 108: \$4,000,000	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	45	2570	5,711.11%	0	0	0
		34,000,000	Other	Other	5	0	0.00%	2	0	0.00%
Economic Development Programs	Economic Development	CDBG: \$250,000	Facade treatment/busine ss building rehabilitation	Business	0	0	0	0	0	0
riograms			Businesses assisted	Businesses Assisted	50	237	474.00%	10	53	530.00%
Homeownership		CDBG: \$ 250,000 HOME: \$2,000,000	Homeowner Housing Added	Household Housing Unit	50	31	62.00%	17	4	0.00%
Programs Affordable Housing	Affordable Housing		Homeowner Housing Rehabilitated	Household Housing Unit	25	20	80.00%	5	13	0.00%
Housing	Affordable Housing	CDBG:	Public service activities other than Low/Moderate Income Housing Benefit	Persons Assisted	0	124	0	0	0	0
Stabilization Programs	Homeless	\$850,000	Public service activities for Low/Moderate Income Housing Benefit	Households Assisted	0	531	0	200	124	0.00%
			Other	Other	420	0	0.00%	0	0	0
		cons.	Rental units constructed	Household Housing Unit	0	21	0	60	60	0.00%
Rental Housing Programs		using CDBG: \$750,000 HOME: \$3,348,000 HOME-ARP: \$3,831,156	Rental units rehabilitated	Household Housing Unit	250	0	0.00%	5	46	0.00%
	Affordable Housing		Tenant-based rental assistance / Rapid Rehousing	Households Assisted	0	26	0	95	19	3.16%
		75,031,130	Housing for Homeless added	Household Housing Unit	0	7	0	63	0	0.00%

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified. The City of Boulder successfully focused federal funds to meet the priorities and objectives in the Consolidated Plan and 2024 Action Plan. The City and its community partners believe the programs identified continue to be the best use of the HUD funds.

COMMUNITY INVESTMENT

Flatirons Habitat CHDO Operating (769) – The City of Boulder invested CHDO HOME funds for operating expenses and capacity building costs. Eligible operating costs include salaries, wages, benefits, and other employee compensation; capacity building for the organization related to a specific future set-aside project to develop affordable housing or carry out the functions related to the organization; employee education, training and travel to perform job; office rent and utilities; communication costs; taxes and insurance.

Boulder Shelter Office Rehab (761) - The City of Boulder invested CDBG funds in 2024 for an interior renovation of Boulder Shelter for the Homeless overnight shelter facility and transitional housing located at 4869 Broadway. Interior improvements include, construction of additional office space by remodeling under utilized portions of the building, conducting lighting upgrades and installation of a walk in freezer to store donated food. Project completion is expected at the end of 2025.

Growing Gardens Greenhouse (767) - The City of Boulder invested CDBG funds in 2024 for costs related to the construction of an energy efficient greenhouse. The project is experiencing significant delays acquiring contractors and securing permits from the City of Boulder. Project is anticipated to continue beyond 2025.

ECONOMIC DEVELOPMENT

Microenterprise (771) – The City of Boulder invested CDBG funds in 2024 to cover program costs for their microloan program in Boulder. This program included the creation of economic opportunities for low- to moderate-income people who own and operate small businesses in Boulder. Program services provided by Colorado Enterprise Fund (CEF) include business training, counseling and technical assistance, loan monitoring and servicing, and Boulder program marketing and outreach.

HOMEOWNERSHIP PROGRAMS

Habitat Violet (734) – The City of Boulder invested HOME funds in 2024 towards the construction of the remaining four homeownership units. Flatirons Habitat for Humanity's Violet Ave project consists of 19 total new construction homeownership units. Seven of these units are HOME designated units at 2180 Violet Avenue. Completion is expected in February 2025.

Housing Rehab (750) – The City of Boulder invested CDBG funds in 2024 towards the Minor Home Repair program serving the City of Boulder, provided by the City of Longmont, to assist very-low, low- and moderate-income homeowners by offering the following programs: General Homeowner Rehabilitation Program, Emergency Grant Program, Mobile Home Repair Program, and Architectural Barrier Removal Program. In 2024, 13 households were served, while 10 households were expected.

HOUSING STABILIZATION

Family Resource Schools (770) – The City of Boulder invested CDBG funds in 2024 for staff salaries and specified operating costs supporting the Family Resource Schools Program delivery of educational support to five elementary schools within the Boulder Valley School District (BVSD). Eligible operating costs included payments to professional after-school teachers, educational materials, and transportation costs. 124 households benefitted from this activity in 2024.

RENTAL HOUSING PROGRAMS

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

Boulder Shelter PSH Units Electrical rehab (760) – The City of Boulder invested CDBG funds in 2024 for capital improvements at 12 permanent supportive housing (PSH) rental housing units owned and operated by Boulder Shelter for the Homeless, to upgrade electrical panels. The project was completed early in 2024.

Thistle Parkside Village Rehab (762) – The City of Boulder invested CDBG funds in 2024 for capital improvements for permanently affordable rental housing units at Parkside Village. The proposed project involves replacement of decks on 34 units to be replaced in the front and back of the property. The project also involves repairs to four ADA unit entry ramps. The project is on track for completion in late 2025.

Broomfield TBRA (766) – The Consortium invested HOME funds in 2024 supporting the tenant based rental assistance program administered by the City and County of Broomfield. With increased marketing efforts, enrollment into the program has expanded with 19 new households currently being served.

ADMINISTRATION

The City of Boulder allocated HOME (757), HOME ARP (749) and CDBG (764) funds in 2024 towards respective general administration costs.

CR-10 - Racial and Ethnic composition of families assisted. Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

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

	CDBG	HOME
White	156	18
Black or African American	5	1
Asian	14	0
American Indian or American Native	11	0
Native Hawaiian or Other Pacific Islander	4	0
Total	190	19
Hispanic	94	3
Not Hispanic	108	19

Narrative: In addition to the households represented in the table above, there were 12 households assisted with CDBG that identified as Other/Multiple races with 7 of those households reporting as Hispanic. This information was added in the narrative portion since there is not a line item in table 2. Populations served by Boulder as shown in the table above include families and persons served and are representative of the population mix of the city. Current <u>demographics</u> for the City of Boulder - White 83.16 % / Black 1.04% / Asian 5.92 % / American Indian or Alaska Native 0.57% / Native Hawaiian-Other Pacific Islander 0.06% / Some other race 1.96% / Two or more races (multiracial) 7.29 % / Not Hispanic 89.26% / Hispanic 10.74%. The table below shows a more detailed breakdown of all accomplishments for HOME and CDBG and by each activity.

Source Data By Activity:

ce	AMI
LE	AIVII

	Activity									
	Name (beneficiary			Black		AI/A	NH/	Multi	Hispa	Non-
IDIS	type)	Totals	White	/AA	Asian	N	O-PI	race	nic	Hispanic
	,, ,			,						
	FRS									
770	(persons)	124	86	4	10	11	4	9	82	42
	Housing									
	Rehab									
	(housing									
750	units)	13	12	0	1	0	0	0	2	11
	Micro-									
	enterprise		4-7						_	4.6
771	(businesses)	53	47	1	2	0	0	3	7	46
	BSH (housing									
760	units)	12	11	0	1	0	0	0	3	9
	TBRA									
766	(households)	19	18	1	0	0	0	0	3	19
	TOTALS:	221	174	6	14	11	4	12	97	127

AIVII									
Ext. Low	Low	Mod	Above 100%						
98	13	6	7						
10	3	0	0						
21	7	9	16						
12	0	0	0						
15	3	1	0						
156	26	16	23						
	_								

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

Table 3 - Resources Made Available

Source of Funds	Source	Resources Made Available	Amount Expended During Program Year
CDBG	public - federal	2,477,632	\$1,549,036.98
HOME	public - federal	4,690,531	\$2,713,795.03
Section 108	public - federal	4,000,000	\$1,019,781.36
Other – HOME ARP			
Admin	public - federal	4,252,079	\$5,211.64

Narrative

Note that the Other row includes HOME-ARP (\$4,256,840 available with \$5,211.64 disbursed for administration).

Between prior year commitments and FY 2024, CDBG funds were expended to support:

- Economic Development MIcroenterprise (\$50,000)
- Housing rehab for BSH and Longmont Housing Rehab \$109,425.56
- Public Facitlies & Improvements BSH office rehab and Growing Gardens \$89,830.06
- Public services FRS \$120,000
- General Administration and Planning \$160,000.
- Repayment of Section 108 Loans The Section 108 loan was used for the construction of a modular affordable housing production facility. CDBG funds were expended to repay the loan, which included planned repayment of principal, interest and financing fees (\$1,019,781.36)

HOME funds were expended to support rental housing and stabilization:

- BHP Hilltop (\$1,980,000),
- Habitat Violet (\$404,900),
- TBRA (\$129,385.68),
- CHDO Operating (\$41,466.35),
- Administration (\$110,577).

Identify the geographic distribution and location of investments

Table 4 – Identify the geographic distribution and location of investments

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

Narrative

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

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

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

Leveraging

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

The Match Liability requirement for 2024 was \$409,414 according to the PR33 report. The City of Boulder had expenditures as described below, using the city's affordable housing fund, a local funding source, for affordable housing projects.

The City of Boulder provided local affordable housing funds for new construction of affordable rental housing at BHP Rally Flats in 2023 and BHP Hawthorn in 2024.

Publicly owned land in 2024 included:

 Alpine Balsam – the City of Boulder purchased 1100 Balsam Ave in 2015 for the purpose of redeveloping the previous hospital into a new municipal campus, affordable housing, and some market rate housing lots. BHP will develop the affordable housing. Pre-development continued in 2024.

Table 5 – Fiscal Year Summary - HOME Match Report

Fiscal Year Summary – HOME Match							
1. Excess match from prior Federal fiscal year	\$7,255,514						
2. Match contributed during current Federal fiscal year	\$7,000,000						
3 .Total match available for current Federal fiscal year (Line 1 plus Line 2)	\$14,255,514						
4. Match liability for current Federal fiscal year	\$409,414						
5. Excess match carried over to next Federal fiscal year (Line 3 minus Line	\$13,846,100						
4)							

Table 6 – Match Contribution for the Federal Fiscal Year

	Match Cor	ntribution for	the Federa	Fiscal Year	•			
Project No. or Other ID	Date of Contribution	Cash (non-Federal sources)	Foregone Taxes, Fees, Charges	Appraised Land/ Real Property	Required Infrastructur e	Site Preparation, Construction Materials, Donated labor	Bond Financing	Total Match
BHP Rally Flats	10/20/2023	\$3,000,000	0	0	0	0	0	\$3,000,000
BHP Hawthorn	4/11/2024	\$4,000,000	0	0	0	0	0	\$4,000,000

HOME MBE/WBE REPORT

Table 7 – Program Income

Program Income –	Program Income – Enter the program amounts for the reporting period									
Balance on hand	Amount received	Total amount	Amount	Balance on hand						
at begin-ning of	during reporting	expended during	expended for	at end of						
reporting period	period	reporting period	TBRA	reporting period						
\$	\$	\$	\$	\$						
0	\$35,779.57	\$35,779.57	0	0						

Table 8 – Minority Business and Women Business Enterprises

Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar

value of contracts for HOME projects completed during the reporting period

	Total		Minority Busir	ness Enterprises	s	White Non-
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic
Contracts	•					•
Number	2	0	0	0	0	2
Dollar	\$2,596,888	0	0	0	0	\$2,596,888
Amount						
Sub-Contra	cts					
Number	0	0	0	0	0	0
Dollar	0	0	0	0	0	0
Amount						
	Total	Women Business Enterprises	Male			
Contracts						
Number		0				
Dollar Amount		0				
Sub-Contra	cts	1	•			

Table 9 – Minority Owners of Rental Property

0 0

Number

Dollar Amount

Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted

	Total		Minority Property Owners					
		Alaskan Native or American Indian	Asian or Pacific Islander	Black Non- Hispanic	Hispanic	Hispanic		
Number	0	0	0	0	0	0		
Dollar Amount	0	0	0	0	0	0		

Table 10 – Relocation and Real Property Acquisition

Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition.

Parcels Acquired	0	0	
Businesses Displaced	0	0	
Nonprofit Organizations	0	0	
Displaced			
Households Temporarily	0	0	
Relocated, not Displaced			

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

CR-20 - Affordable Housing 91.520(b)

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

Table 11 - Number of Households

Number of households to be provided:	One-Year Goal	Actual
Homeless	75	0
Non-Homeless	131	202
Special-Needs	0	0
Total	206	202

Table 12 - Number of Households Supported

Number of households to be supported through:	One-Year Goal	Actual
Rental Assistance (TBRA)	15	19
Production of New Units (Hilltop/Violet)	124	64
Rehab of Existing Units (Housing Rehab,		
BSH Electrical Panels and Thistle decks)	51	59
Acquisition of Existing Units	16	0
Total	206	142

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

Number of households supported through Rental Assistance – Broomfield TBRA (766) expanded the program to include eligible senior households in 2024, and the number of households supported through the program was 19.

Number of households supported through The Production of New Units – The goal was based on BHP Hilltop (752) and Habitat Violet (734), which are multi-year new construction projects. Hilltop is anticipated to support 60 beneficiaries in 2025, and Habitat Violet will support beneficiaries in 2025.

Number of households supported through Rehab of Existing Units – The goal was 10 households supported through Housing Rehab (750). 13 households were supported. 12 Households were supported through Boulder Shelter PSH rehab (760) to replace electrical panels. 34 rental units are scheduled for rehab (deck replacement) at Thistle Parkside (762) in 2025.

There were no new acquisitions in 2024.

Discuss how these outcomes will impact future annual action plans.

We are currently working on compiling the 2025 Action Plan. Goals for TBRA will be adjusted based on the increase for demand with outcomes being adjusted for expected beneficiaries for the plan year. This program is a multi-year endeavor.

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

Number of Households Served	CDBG Actual	HOME Actual
Extremely Low-income	141	15
Low-income	23	3
Moderate-income	15	1
Total	179	19

Narrative Information

Not included in the chart above is the income category for "Non-Low/Moderate" (above 100% AMI). There were 23 households assisted above 100% AMI, including 16 businesses from Microenterprise activity 771 and 7 persons from Family Resource Schools activity 770. This information is added in this narrative portion since there is not a line item in the table for Above 100% AMI.

CDBG:

- **Family Resource School (758)**: services families from income levels ranging from extremely low to the non-low moderate income levels. In 2024, there were 124 households supported.
- Housing Rehab (750): Minor Home Repair program serving the City of Boulder provided by the City of Longmont to assist very-low, low- and moderate-income owner-occupied homeowners by offering the following programs: General Homeowner Rehabilitation Program, Emergency Grant Program, Mobile Home Repair Program, and Architectural Barrier Removal Program. 13 households were supported.

- Microenterprise (755): provided 53 micro-loans to small businesses in the City of Boulder.
- **BSH (760)**: The City of Boulder invested CDBG funds for capital improvements at 12 permanent supportive housing (PSH) rental housing units owned and operated by Boulder Shelter for the Homeless (BSH), to upgrade electrical panels. The project was completed early in 2024.

HOME:

Broomfield Tenant-Based Rental Assistance Program (TBRA) (754): is a two-year self-sufficiency program, providing rental assistance and supportive case management for low-income Broomfield households (inclusive of Broomfield City and County). The over-arching program goal is for families to be self-sufficient at the end of the two-year program. To meet eligibility, households must be homeless, living with family or friends, or have unsafe/unstable housing. 19 households were supported.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c) Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs.

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

- Opening a holistic, housing-focused Day Services Center which includes basic service provision, engagement ervices, co-location of multiple homeless services partners, mental health services, respite care, health services, peer support, case management, supply distribution, and other associated programs.
- Incorporating CE services in Day Services Center and All Roads shelter programming.
- Enhancement of the BTHERE outreach program including in-field CE screening
- Participation in countywide coordinated outreach programming.
- Improved coordination between municipal court homeless navigators, Police department, Parks, the Safe and Managed Public Spaces (SAMPS) team, nonprofits and housing staff to ensure adequate encampment outreach.
- Consultation with Boulder Police Department's in-depth analysis and survey of unhoused persons in encampments
- Conducting a Summer Point in Time Count and Survey in July 2024

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

Emergency Sheltering for adults in Boulder County is provided at All Roads (up to 180 bed) and HOPE for Longmont (up to 48 beds). Sheltering is provided to victims of domestic violence through SPAN and Safehouse. Youth sheltering occurs at TGTHR. Sheltering for women and transgender people is provided at The Lodge. Between 1/1/2024-12/31/2024:

- All Roads provided 63,193 bed nights of service through program-based, standby, and non-congregate beds.
- In lieu of a family (non-DV) shelter, families are bridged to housing programs through hotel vouchers.
- Inclement weather sheltering through BSH includes non-congregate sheltering for individuals between 11/15 and 3/31 and an expansion of 65 additional beds at a city facility during Extremem Weather conditions.
- Boulder Municipal Court continued a short-term transitional housing program for high justicesystem utilizers to move seamlessly into PSH.

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

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

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

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

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

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

City of Boulder accomplishments included:

- Increased funding for locally funded vouchers and associated case management.
- Obtained project-based vouchers for shelter acquisition units, allowing for more targeted support.
- Obtained 30 state vouchers associated with the Day Services Center to align housing-focus with resources.
- Provided gap financing and support for PSH units as a percentage of all affordable housing development.
- Enhanced the High Utilizer task force to meet the unique needs of unhoused high utilizers of the criminal justice system. Created and implemented an MOU for data sharing and a revised Release of Information between jurisdictions, including criminal justice, hospital, governmental, and mental health entities.
- Provided rental assistance for Ready to Work program graduates.

 Maintained the Building Home Program – peer support programming and a dedicated Housing Retention Team designed to build community, reduce isolation, and assist people with maintaining PSH units.

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

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

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

Actions taken to address the needs of public housing.

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

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

BHP Public Housing Example and Property Updates:

 Arapahoe Court - Arapahoe Court - In 2024, BHP received approval from HUD to exit the Public Housing program in 2024 and sell the property at Fair Market Value. BHP anticipates marketing Arapahoe Court for sale starting Q2 2025.

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

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

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

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

The City of Boulder also provides local funding to the Boulder County Personal Finance Program which provides housing and financial counseling and community education services to low and moderate income persons, including homeownership and financial assessments, goal setting, money management, budgeting, reducing debts, credit repair and savings.

Actions taken to provide assistance to troubled PHAs.

There were no troubled PHA's in 2024, therefore no action was taken.

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

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

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

Regional cooperation continued in 2024 through the Regional Housing Partnership. The partnership includes all jurisdictions in Boulder County and meets monthly to share expertise and coordinate funding requests and policy updates at the state level. The Partnership also assisted in the implementation of the voter approved Affordable and Attainable Housing Tax approved by voters to dedicate approximately \$16M is sales tax funding for housing development and supportive services to address homelessness.

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

During 2024, the City of Boulder continued efforts to consolidate affordable housing compliance for both rental and homeownership with the goal of increasing efficiency and remove barriers to accessing affordable housing countywide. An intergovernmental agreement was executed by the county, Boulder, Erie, Lafayette, and Louisville to formalize the structure and funding will be supported through county ARPA sources. The Regional Affordable Housing Program formally launched and partners are seeking opportunities to expand affordable housing within their jurisdictions.

In 2024, the City of Boulder continued to adopted regulatory changes to allow more affordable housing by removing occupancy limits, removing additional barriers to the creation of Accessory Dwelling Units, revising density calculations in single-family neighborhoods and along transit corridors, removed the requirement for a lengthy discretionary review process for projects with 100% affordable housing, and increased the variety of housing types in more zoning districts.

Similar efforts to remove regulatory restrictions on Accessory Dwelling Units and elimate occumpancy restrictions are underway in all Boulder County jurisdictions to comply with new state requirements. Several jurisdictions have fee waivers for affordable housing either in the form of exempting affordable housing from certain fees (Longmont and Erie) or by providing additional subsidies for the affordable housing developer to pay those fees (Boulder).

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

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

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

The City of Boulder has temporarily taken over administration of the Housing Rehab Program, that has an objective to evaluate and reduce lead-based paint hazards in low-income homes in the City of Boulder. City leadership is taking into consideration the long-term administration of the program.

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

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

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

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

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

The City of Boulder continues to support the Eviction Prevention and Rental Assistance Program; a city ordinance which levees a rental licensing tax to fund legal services and provide rental assistance to persons at risk of eviction.

Each year, the City of Boulder also administers the Food Tax Rebate Program to help compensate residents with lower incomes for the city sales tax they pay on food. Those seeking a rebate must fill out an application documenting their eligibility. In 2024, rebates were \$104 for individuals and \$318 for families. City residents who do not have permanent shelter are eligible for the refund and can meet the residency requirement by providing documentation that they are receiving services from a city recognized homelessness services agency.

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

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

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

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

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

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

Notable collaborations include:

- Boulder County Funders Collaborative Investment program staff from county and municipal
 governments, and staff from local community foundations collaborate to identify and respond
 to fund human service needs through nonprofit partner agencies. City of Boulder staff facilitate
 the Collaborative, its specific purpose is to enhance coordination and work to eliminate gaps in
 services while avoiding duplication of services.
- Homeless Solutions for Boulder County This collaborative (City of Boulder, City of Longmont, Boulder County, local housing authorities) meets regularly to determine housing and service needs for single adults experiencing homelessness.
- Boulder County Regional Housing Partnership: All 10 Boulder jurisdictions have passed resolutions to support the work of the Regional Housing Partnership and continue to work towards the 12% permanently affordable housing goal secure 12% of all residential properties in the county as permanently affordable by 2035. Collective work focuses on creating and preserving housing opportunities, implementing programmatic and regulatory efficiencies and alignment, and increasing financial resources. On January 29, 2024, the partnership hosted an Affordable Housing Summit for elected officials, staff, and the public to evaluate the current status of the plan and identify next steps. Additionally, in 2024, five jurisdictions entered into an Intergovernmental Agreement that established a regional homeownership and rental compliance program administered by the City of Boulder Staff.
- **Boulder Broomfield Regional Consortium** Works to identify and address common housing needs, overcome gaps in affordable housing provision and increase the amount of HOME funding coming to our local region.

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

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

As a part of the development of the 2020-2024 Plan, a regional Analysis of Impediments to Fair Housing Choice (AI) was utilized as a data source. According to the AI, which analyzed data from area public housing authorities, housing authority clients largely have extremely low incomes. Many are older adults

and are unlikely candidates for ownership housing. For those interested in ownership, the most effective programs are likely land trusts and/or stabilizing ownership within mobile home park communities.

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

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

CR-40 - Monitoring 91.220 and 91.230

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

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

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

In 2024 a total of 30 projects were monitored which included 7 HOME-assisted properties and 1 CDBG project. There were ten (10) projects monitored which resulted in corrective action and seven (7) projects that resulted in technical findings. All corrective actions were resolved within the time required. In addition to monitoring projects/properties, a total of 114 units were inspected to ensure affordable units remain descent, safe and sanitary.

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

Citizen Participation Plan 91.105(d); 91.115(d) Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

In the interest of enhancing citizen participation, the City of Boulder requested comments on the 2024 CAPER. A 15-day public comment period began Saturday, March 1, 2025. All residents were notified via the local newspaper and the city website. Residents are encouraged to submit written comments or questions by 5:00 pm, on Monday, March 17, 2025. A public hearing will be held on Tuesday, March 18, 2025, at 1:00 pm at 1101 Arapahoe Ave., Boulder, CO, 80302.

CR-45 - CDBG 91.520(c)

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

The City of Boulder met the 2024 timeliness test. The city continues working with subrecipients to ensure the timeliness standard will continue to be met year over year. The city remains committed to obligating and expending its funds to achieve and maintain compliance.

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

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

[BEDI grantees] Describe accomplishments and program outcomes during the last year. The city of Boulder does not have any open Brownfields Economic Development Initiative grants.

CR-50 - HOME 24 CFR 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations. Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

A total of 114 units were inspected at the following properties.

- 30PSH (Bluebird)
- Alvarado Village
- Attention Homes Residences
- BCHA Aspinwall
- BCHA Josephine Commons
- BCHA Kestrel
- BCHA Lafayette Geneseo
- BCHA The Spoke on Coffman
- BHP Arapahoe East
- BHP Bridgewalk
- BHP High Mar
- BHP Hilltop
- BHP Lee Hill
- BHP Vistoso
- BHP Woodlands
- Bridge House RTW
- Depot Square
- Ellipse (Diagonal Crossing
- Ledges
- Lumine

- Mother House dba Haven Ridge
- Nest Properties Ossage
- Nest Properties The Nest
- Nest Properties Thunderbird
- Spark West
- Tribe Recovery Home
- Weathervane

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

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

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

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

- 1. The City staff is responsible for implementing the Marketing Plan and evaluating its effectiveness as required by the CDBG/HOME Program.
- 2. The City informs the community about its Affirmative Marketing Policy through periodic updates at public forums and Fair Housing meetings, as well as training workshops with its CDBG/HOME grantees or other similar forums. The City's Affirmative Marketing Policy is published on the City's website which is included in the Rental Compliance Manual.
- 3. The City provides fair housing information/referrals, case investigation services, tenant/landlord information/referrals and mediation services.
- 4. The City collaborates with the office of Human Rights to reduce discrimination in housing.
- 5. The City refers tenants and rental property owners to the Community Mediation and Resolution Center (https://bouldercolorado.gov/community-relations/mediation-program) regarding tenant and landlord rights and responsibilities.
- 6. The City provides information about fair housing, fair housing service providers, fair housing brochures and a copy of the City Affirmative Marketing Plan is available on the City Department of Housing and Human Services, Investment & Compliance website. https://bouldercolorado.gov/services/investment-and-grant-compliance
- 7. The City continues to provide general information and telephone reference numbers to persons contacting the City of Boulder, Department of Housing and Human Services with questions regarding Affirmative Marketing and Federal Fair Housing laws.

- 8. The City requires that Grantees of CDBG and/or HOME funded rental/homebuyer housing provide an annual report describing how their actions have complied with the City Affirmative Marketing Plan.
- 9. The City periodically posts flyers and brochures which describe fair housing laws and services in open public areas.

Grantees of CDBG/HOME funds instruct all employees and agents on the policy of nondiscrimination of fair housing both in writing and orally.

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

CDBG Program Income (PI) received during 2024 included three loan repayments from the Housing Rehab program. As required by HUD, PI must be expended first.

Loan repayments received:

\$6,000 Housing Rehab Loan repayment \$5,000 Housing Rehab Loan repayment \$24,779.57 Housing Rehab Loan repayment

In 2024, \$6,000 was used towards) Growing Gardens (767) for program expenses. \$29,779.57 was used towards Microenterprise (771) for program expenses. Net drawn amount for program year 2024 totaled \$35,779.57 as shown in PR01 and allocated as per above.

Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)

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

PR27 - Status of 2021 HOME ARP Grant:

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

CR-58 - Section 3

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

Table 14 – Total Labor Hours

Total Labor Hours	CDBG	HOME
Total Number of Activities	1	2
Total Labor Hours	13,180.04	102,295
Total Section 3 Worker Hours	6,303.31	23,425
Total Targeted Section 3 Worker Hours	0	24

Table 15 – Qualitative Efforts - Number of Activities by Program

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

Narrative

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

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