



Boulder County Collaborative

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March 4, 2019

Leslie Irwin, Policy Analyst
Boulder County Commissioners' Office
1325 Pearl Street, 3rd Floor
Boulder, CO 80302

RE: Desk Monitoring of Boulder County St. Vrain Creek Road Damage Phase 1: Sunset Bridge Project (Project # INF-00044)

Dear Ms. Irwin:

The City of Longmont, as Lead Agency for the Boulder County Collaborative (BCC), conducted a desk monitoring review of Boulder County's St. Vrain Creek Road Damage Phase 1: Sunset Bridge Project (Project Number INF-00044) for the purpose of restoring access on Sunset Street across St. Vrain Creek post-flood. The desk monitoring took place between February 11, 2019 and February 21, 2019. This activity (Project No. INF-00044) was funded by an Intergovernmental Grant Agreement (IGA) for Community Development Block Grant Disaster Recovery (CDBG-DR) funding. The IGA Amendment funding this project was originally executed on March 1, 2016, as amended, most recently on March 4, 2019, by and between Longmont as the Lead Agency for the BCC and Boulder County.

The desk monitoring was conducted by Molly O'Donnell, CDBG Disaster Recovery Project Manager, City of Longmont, and Deb Siefert, CDBG-DR Specialist for Hagerty Consulting. See details of monitoring results below.

SCOPE OF REVIEW

Project & Programmatic Grant Management

The following areas of project and programmatic grant management were reviewed:

1. National Objective (Section IV-A)
2. Environmental Review (Section IV-B)
3. Procurement (Section IV-D)
4. Public Improvements (Section IV-F)
5. Duplication of Benefits (Section IV-M)

The following documentation was available in the Salesforce data system files during the review to assist with the determination of compliance:

- Project files (disaster relatedness, project scope, and funding)
- Duplication of Benefits (DOB) review and verification of all funding sources
- Environmental review and clearance

- Supporting documentation for procurement and management of JUB Engineers, Inc. and Flatiron Constructors, Inc.

Overall Observations of St. Vrain Creek Road Damage Phase 1: Sunset Bridge Project

Boulder County is proposing to expend \$400,166.22 of CDBG-DR funds for the project, which was determined to significantly aid in the immediate flood recovery efforts for Longmont neighborhoods north and south of the Sunset Street Bridge in low and moderate income communities.

Summary of Results and Conclusions

The monitoring team had one finding and no concerns after review of the project files.

1. **National Objective (Section IV-A)** – No findings, no concerns
2. **Environmental Review (Section IV-B)** – No findings, no concerns
3. **Procurement (Section IV-D)** – One finding, no concerns
 - a. **Finding 1** – Boulder County did not procure the contracts reviewed as part of this monitoring, the City of Longmont did on both agencies' behalf. At the time of procurement of JUB Engineers, Inc. in 2014, the City of Longmont issued a Request for Proposals (RFP). However, since price was not part of the selection criteria, a Request for Qualifications (RFQ) should have been issued (2 CFR §200.320(d)(5)). Additionally, the evaluation criteria was listed in order of importance in the RFP, however it did not include the weighted ranking of each criterion to definitively determine the relative importance as required by 2 CFR §200.320(d)(1).

However, CDBG-DR funding was not anticipated to be used for these costs at the time of procurement (Boulder County submitted an application for CDBG-DR funds in November 2017), and HUD had not yet implemented 2 CFR §200 to replace 24 CFR Part 85. Additionally, both Boulder County and Longmont have completed more recent CDBG-DR-funded procurements since this project which provide evidence of proper use of RFQ vs. RFP and weighted evaluation criteria. Therefore this finding is considered closed and no corrective action is necessary.

4. **Public Improvements (Section IV-F)** – No findings, no concerns
5. **Duplication of Benefits (Section IV-M)** – No findings, no concerns

Please share this letter with Boulder County staff as appropriate.

Sincerely,



Kathy L. Fedler
BCC CDBG Disaster Recovery Program Manager

cc: Molly O'Donnell, BCC CDBG Disaster Recovery Project Manager
Tim Swope, Boulder County Capital Program Coordinator

Enclosures: Final Compliance Monitoring Forms