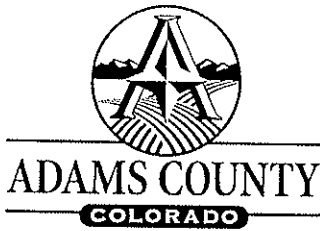


Analysis of Impediments to Fair Housing Choice

Prepared for Adams County, CO
By *Albertson Clark Associates*

Adopted 2007



Planning and Development Department

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MEMORANDUM

To: Keith Frausto, Community Development Administrator
From: Scott Tempel, Senior Long Range Planner
Through: Abel Montoya, Planning Manager
Through: Rob Coney, Director, Planning and Development Department
Subject: Analysis of Impediments to Fair Housing Choice
Date: January 24, 2007

The Adams County Community Development has requested a response from the Planning and Development Department to the Analysis of Impediments to Fair Housing Choice recently completed by Albertson Clark Associates. This memorandum states the Department's position towards the report in general and the specific action items pertinent to Planning and Development. It is intended to clarify the Department's capacity to act on the recommendations and by no means constitutes policy directive or a commitment to future action by the Department of Planning and Development unless the Board of County Commissioners approves it.

The Adams County Planning and Development Department is already actively pursuing some of the report recommendations. Three recent actions demonstrate the Department's commitment to promoting housing access and the employment/housing/transportation linkage. One, the Adams County Development Standards and Regulations were recently rewritten to provide regulations in all zone districts which allow for pyramidal zoning classifications. This will help streamline the development process and is a proactive measure to create a business-friendly environment to attract new employers. This should stimulate the employment side of the balance.

Two, the Planning and Development Department will be spearheading the creation of a county-wide Balanced Housing Plan in 2007. This effort will be developed in conjunction with Adams County Community Development and the Adams County Housing Authority as a measure to explicitly address the employment/housing/transportation linkage on a large scale. It is hoped the municipalities will play a vital cooperative role in the development of collaborative strategies to tackle this complicated issue.

Three, Transit Oriented Development Guidelines were adopted as an amendment to the Comprehensive Plan emphasizing, among other things, the creation of attainable housing units close to transit facilities. These Guidelines set the stage for continued planning around projected transit stops that will accommodate a broad range of housing types within a mixed use environment, furthering both the goal of affordable housing and the jobs vs. housing balance.

Although Planning and Development holds a generally favorable viewpoint toward this report, it must be acknowledged that the Analysis contains some fundamental flaws. First, it lacks perspective on the reality that the county housing market operates within a much larger regional framework. This, combined with an absence of business based rationale, may lead the reader to believe the County has a much greater influence on the housing market than it really does.

Second, and more important from a practical standpoint, is the fact that Adams County does not provide municipal services for urban residential development at any price point. Eighty percent of Adams County's population resides in the municipalities and it has been a longstanding County policy that urban development should occur within or adjacent to the cities. Therefore, the ability for Adams County Planning and Development to influence the supply of housing units attainable to the workforce and to other special needs groups is limited. Nonetheless, we do support the evaluation of all goals, policies, regulations, and fees for their potential impact on the provision of affordable or attainable housing at both the county and municipal level. It must be made perfectly clear, however, that the directive to make regulatory changes or to create incentive programs for the County must first come from the Adams County Board of County Commissioners. To foster such change, it would be helpful if specific strategies were posited to address the needs of the various service populations, e.g. homeless, working poor, elderly and infirm, etc. It is also essential that the author clearly delineate both the overall purpose and intent of this report and clearly differential between the role of the County and the municipalities. In its current format it is often unclear toward whom the critique and/or recommendations are directed.

Appropriately, the Analysis does point out that the Adams County Comprehensive Plan, Development Standards and Regulations, and development review processes are not impediments to fair housing choice. It also states that Adams County charges fairly typical development fees, which may actually be lower than other fees in the metro Denver area. Fee reductions and waivers have not been considered by the Adams County Board of County Commissioners in the past as it is recognized that our fees are already reasonable, serve a vital public purpose, and ensure that new development "pays its own way." "Fast tracking" certain development applications is not a viable alternative for Adams County either, due to our regulatory requirements for public notification. There may be, however, other options that could be made available by the Board of County Commissioners. Incentives such as density bonuses or allowing accessory dwelling units should be considered along with other positive market influences when any further study of these issues is undertaken.

MEMORANDUM

DATE: April 5, 2007

TO: Barbara J. DesMarteau, Director
Community & Economic Opportunity Department

FROM: Keith Frausto, ACCD Administrator
Christie Henderson, Community Development Program Manager

RE: Analysis of Impediments to Fair Housing Choice

Adams County Community Development (ACCD) commissioned an independent consultant to review Adams County policies and practices as it relates to Fair Housing in Adams County. The Analysis of Impediments to Fair Housing Choice conducted by Albertson Clark Associates identified some limited impediments to Fair Housing. The Analysis of Impediments to Fair Housing Choice is a useful guide and planning tool for potential improvements for promoting fair housing opportunities within Adams County.

The report documents a limited number of cases of housing discrimination, as well as impediments related to the availability of affordable housing. In addition, the analysis outlined policies and procedures that could stimulate the increased development or preservation of affordable housing in the County.

The report makes note of the wide range and number of entities and programs that promote, develop or retain affordable housing in the County. This includes programs implemented by non-profit organizations, the Adams County Housing Authority, Adams County Community Development, and efforts within each municipality.

Adams County is addressing fair housing opportunities through affordable housing programs that focus on:

- Deconcentrating poverty by facilitating housing choice options with equitable access to education, transportation, and employment opportunities;
- Facilitating opportunities for residents to live in their home as they age thus alleviating the need to relocate to Denver or larger areas to reside in a specialized facility;
- Educating renters and homebuyers in budgeting, choosing a Realtor/Landlord, inspection requirements and choosing an appropriate community.

Current programs addressing the above listed items offered by and support by Adams County Community Development follow:

Adams County and partners such as Adams County Housing Authority and Almost Home currently provide **Tenant Based Rental Assistance (TBRA)** to assist local families with making rent payments on units that would otherwise be too expensive to live in.

The Minor Home Rehab (MHR) program allows Adams County to assist low income homeowners in meeting code requirements as well as repair their homes when there is health or life threatening repairs needed. The MHR program assisted 21 households from March 2006 to December 2006.

The Home Loan Program (HLP) provides zero to 3% interest loans to Adams County moderate income homeowners for the purpose of rehabilitating their home. These loans are used to make homes accessible for homeowners with disabilities and to increase energy efficiency through the replacement of windows and heating systems. The HLP program provided assistance to 30 homeowners from March 2006 to December 2006.

Adams County participates in the national **American Dream Downpayment Initiative (ADDI)** promoted through the U.S. Department of Housing and Urban Development. The Adams County ADDI program assists first time homebuyers with acquiring needed money toward a downpayment. The Adams County ADDI program provided downpayments on 25 houses from March 2006 to December 2006.

Adams County also utilizes **HOME** funds to provide transitional/transformational housing, leverage private funds to build new affordable units, and to maintain the stock of affordable units. Between March 2006 and December 2006 HOME funds rehabilitated over 600 units to keep them affordable; built 10 new single family homes, and provided funding for four new transitional units.

The Analysis recommends that policies and regulations within Adams County could be developed or streamlined in order to support affordable housing. It also noted that existing policies are “often adopted without giving attention to how these items may affect the cost and provision of housing”. This statement does not recognize the limited authority the County has over the municipalities and vice versa. In addition, the County has limited authority to enact new laws or regulations over private property owners in the case of mobile home parks, or citizens which reside inside the jurisdiction of a City.

In an effort to examine policy issues and the relationship between economic development, jobs, education, housing and transportation, the Adams County Board of County Commissioners approved the creation of a Balanced Housing Plan to accommodate future housing development. A wide range of participants including municipalities, non-profit organizations, the private sector and citizens will assist in the development of the Balanced Housing Plan in order to create a unified vision for housing within Adams County.

Over the last five years there have been 35 complaints of housing discrimination made with three cases still being investigated, three being found to have cause and have been mediated, and the rest being either dismissed or found to have no cause. ACCD agrees with the Consultant's assessment that more can be done to promote and track fair housing issues, publicize information, and inform the public. Towards this end, Adams County Community Development will explore the potential to increase outreach and public education opportunities, as well as create joint and complimentary efforts with other organizations to further Fair Housing Choice.

While recognizing some of the concerns raised in the Analysis—especially with regards to the need for increased outreach and education-- Adams County Community Development believes that the County is effectively promoting Fair Housing and Affordable Housing choice. Adams County is proactive in promoting fair housing choice by leading the County in the development of a Balanced Housing Plan, by preserving affordable units and developing new starter homes, providing homeless shelter support, conducting outreach to neighborhoods and communicating and partnering with businesses, municipalities, and non-profit organizations.

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Executive Summary

This report is the update of the Analysis of Impediments to Fair Housing Choice report originally prepared in 1996 by staff of Adams County Community Development. This update was conducted by Sherry Albertson-Clark of *Albertson Clark Associates* and has been prepared to meet the requirements of the U. S. Department of Housing and Urban Development (HUD) for entitlement communities. This update includes information specific to Adams County, as well as for the nine municipalities located within Adams County. Of these municipalities, five participate in an Intergovernmental Agreement for Community Development Block Grant (CDBG) funding, which is administered by the Adams County Office of Community Development.

The consultant conducted data collection and analysis for this report through a review of published reports, and studies and information available on websites, as well as interviews with staff and/or representatives of many of the participating agencies, organizations, and businesses listed on Page 15. A series of focus groups were held with Adams County residents to gather input on fair housing. The focus groups are described in Section Six of this report. Public involvement opportunities for the study included a presentation to the Adams County Board of County Commissioners in a study session in November; a public meeting held mid-January; a 30-day public comment period during the month of January; and a public hearing held in February 2007.

The intent of this update is to evaluate data and information used in the original 1996 report; review the impediments that were identified in the original report to determine if these impediments still exist; review the actions that have since been taken and evaluate the effectiveness of the actions taken; and identify any new impediments that may exist, as well as any actions that may be recommended to address any newly-identified impediments. Several key observations can be made relative to housing and in particular, fair housing in Adams County and its municipalities. These observations are:

1. The area is becoming more racially and ethnically diverse as its population grows.
2. There is an increasing gap between income levels and housing costs.
3. A lack of education and job skills needed to secure higher incomes was frequently mentioned as a barrier during the course of this study.

Adams County 2006 Impediments

The items listed below have been identified as impediments to fair housing choice in Adams County in the 2006 Analysis of Impediments for the County.

- The existence of some housing discrimination on a limited basis

- Development-related impediments (NIMBY-ism (not in my backyard), land development costs and impact fees, growth management and design regulations, employment/housing/transportation linkages)
- Limited policies and programs to support affordable or attainable housing (policies that would evaluate impact of public actions on the provision of housing; programs with incentives for promoting affordable or attainable housing)
- Limited supply of housing units (for low/very low-income households; larger units for families; emergency/transitional housing units; accessible units for persons with disabilities)
- Limited supply of starter homes
- Language barrier
- Lack of resources (adequate income; adequate education and job skills; information)
- Displacement/loss of housing units
- Foreclosure and credit history problems
- Lack of state and local regulations and standards governing mobile homes and mobile home communities

Recommendations:

These impediments have been identified as a result of interviews with persons knowledgeable about housing issues in Adams County, as well as discussions with nearly 60 focus group participants who are residents of Adams County. From these interviews and discussions, as well as the analysis of housing-related data, a picture of the housing situation in Adams County became clear. Specific impediments or barriers to fair housing choice, as well as suggested steps to take to improve the current situation were made by participants and the project consultant during the course of this study. The details of the recommended Action Steps can be found below and in Section Seven of this report. The agencies and organizations that are suggested to participate in each step are identified, as is a general time frame for beginning and completing each step. Some steps are on-going and the time frame for starting such a step is also suggested. The general nature of the proposed Action Steps can be grouped around the following recommendations for Adams County:

1. An increase in the distribution of information is recommended to address housing discrimination, NIMBY-ism, language barriers, education and job skills, and foreclosure/credit history issues.
2. Planning and development-related regulations and standards, or the lack thereof, should be evaluated at the county and municipal level.
3. Programs and policies at the county and municipal levels should be examined for their affect on the cost of housing and new policies and programs should be considered that promote housing.

4. Additional housing units are needed to serve very low income households; larger families with several children; emergency and transitional housing for the homeless population; accessible housing units for persons with disabilities; and starter homes for those interested in home ownership opportunities.
5. Existing housing units should be retained when feasible, and updated or rehabilitated.

Recommended Actions

It is important to note that Adams County is actively working on many of the identified impediments and their related actions identified in this report. These recommended actions focus on expanding or continuing activities to strengthen the County's efforts to further fair housing and housing opportunity. While Adams County can act as a leader on furthering fair housing, each municipality within the county must also consider the recommendations of this study and choose how to incorporate the recommendations and actions into policies and practices appropriate for their particular community. It is also important to note that Adams County has a limited statutory authority to implement some of the recommendations contained within this report.

1. Existence of housing discrimination – Based on the housing discrimination complaint data provided by HUD, limited housing discrimination appears to be taking place in the municipalities of Adams County, and is more commonly associated with rental housing rather than home ownership. Housing discrimination also appears to be occurring for persons with disabilities.

Actions:

Action 1A: Adams County Community Development and member organizations of the Housing Task Force will work cooperatively with area housing authorities and agencies, Apartment Owners Association, Association of REALTORS, HUD-FHEO, Colorado Civil Rights Division (CCRD), and other relevant organizations to increase outreach on fair housing. This may include providing fair housing workshops, forums, and seminars on a regular basis using a variety of resources and techniques, including written materials, videos, round table discussions. These workshops, forums, and seminars should be available for residents, landlords, agency staff, and real estate and lending officials – begin late 2006 and continue as an on-going action

Action 1B: Adams County Community Development and member organizations of the Housing Task Force should consider increasing cooperation with fair housing enforcement agencies such as HUD-FHEO and CCRD to find ways to improve tracking and data collection on housing discrimination complaints – begin early 2007 and continue as an on-going action

Action 1C: Adams County Community Development and member organizations of the Housing Task Force and municipalities should consider increasing the frequency with which information is distributed to the community regarding fair housing. This includes at client intake, resource fairs, and other housing-related conferences and seminars – begin early 2007 and continue as an on-going action

Action 1D: Adams County will explore options for improving communications between county departments/divisions and county residents and will encourage its municipalities to consider doing the same – begin early 2009 and complete by late 2009

2. Development-related impediments – These impediments include NIMBY-ism; land development costs and impact fees; growth management and design regulations; and the employment/housing/transportation linkage. NIMBY-ism often results from a lack of information and understanding. Those needing affordable or attainable housing today are often the working poor or newly poor and are not the unemployed of the past. Land development costs and impact fees have a significant affect on the cost of delivering affordable or attainable housing. Regulations such as residential design standards and growth management requirements can also impact the cost of housing. Transportation was raised as a key barrier to residents since in many cases, the location of the more affordable or attainable housing in Adams County is not in close proximity to transportation options. Transit-oriented development (TOD) can provide future significant opportunities to improve this barrier.

NIMBY-ism:

Action 2A: Adams County Community Development will increase cooperation with the municipalities, area Housing Authorities, area housing agencies, housing advocates, and area lenders to develop and participate in an Affordable Housing/Fair Housing Public Awareness program to use throughout the county to increase the awareness about housing needs in the community – begin and complete by mid-2007

Action 2B: Adams County Community Development will use information obtained through needs assessments, surveys, Census data, etc. to “put a face” on those needing affordable or attainable housing and incorporate this information into Action 2A above – begin and complete by mid- 2007

Action 2C: The member organizations of the Housing Task Force will increase involvement in collecting, maintaining and distributing information and statistics on housing affordability, such as cost and supply of affordable or attainable housing stock – begin by mid-2007 and continue as an on-going action

Land development costs and impact fees, growth management and design regulations, employment/housing/transportation linkage:

Action 2A: The Adams County Planning office is encouraged to increase involvement with the Home Builders Association, area home builders and developers – both non-profit and for-profit-housing providers, and other interested groups and individuals to evaluate current regulations that may affect the provision of affordable or attainable residential development, including growth management/pacing systems and residential design standards – begin early 2008 and complete by late 2009

Action 2B: The Adams County Planning office should consider increasing involvement with the

Home Builders Association, area home builders and developers, housing providers and other interested groups and individuals to identify possible solutions and alternatives for encouraging affordable or attainable housing developments, including such things as fee reductions, waivers, and/or rebates, as well as other ideas to assist in the facilitation of affordable or attainable housing, such as fast tracking – begin early 2008 and complete by late 2009

Action 2C: Adams County will consider encouraging the municipal planning offices in Adams County to undertake companion actions to Actions 2A and 2B above – begin early 2008 and complete by late 2009

3. Limited policies and programs to support affordable or attainable housing – New policies, programs, and regulations are often adopted without giving attention to how these items may affect the cost and provision of housing and in particular, affordable or attainable housing. Regulations designed to address a specific issue often result in creating other, unintended problems. With the exception of Brighton, there are no programs in place in Adams County to offer incentives for affordable or attainable housing.

Actions:

Action 3A: Adams County will consider establishing a policy to evaluate all goals, policies, regulations, and fees for their potential impact on the provisions of affordable or attainable housing – begin early 2007 and complete by mid-2007

Action 3B: Adams County will consider encouraging the municipalities of Adams County to consider establishing a policy to evaluate all goals, policies, regulations, and fees for their potential impact on the provision of affordable or attainable housing – begin early 2007 and complete by mid-2007

4. Limited supply of housing units (for low/very low-income households; larger units for families; emergency/transitional housing units; accessible units for persons with disabilities) – There is an on-going need for additional housing units for those persons at the lowest income levels, larger units that will accommodate families with several children; emergency and/or transitional housing for those persons that are homeless; and units that provide the needed accessibility for persons with disabilities. Although mobility impairment is often the first thing considered when talking about accessible housing units, there are other disabilities that require special housing needs, such as vision or hearing impairment, or disabilities that require a certain level of air quality.

Actions:

Action 4A: Adams County Community Development will continue to facilitate the provision of housing for low and very low-income households, large families with children, seniors, and persons with disabilities by directing subsidies to developments targeting these populations – this action is on-going

Action 4B: The Adams County Planning Office will promote a mix of housing unit types in all neighborhoods and new developments for residents of all economic levels, in locations that facilitate and promote the employment/housing/transportation linkage – begin early 2008 and continue as an on-going action

Action 4C: Area housing agencies will continue to provide services for those who are homeless, including the provision of additional shelter space and transitional housing opportunities, to assist in the prevention of homelessness – this action is on-going

Action 4D: Adams County Community Development and area housing agencies will pursue additional funding from public and private sources, for the provision of additional shelter space and transitional housing units – this action is on-going

Action 4E: Adams County and the member organizations of the Housing Task Force will continue to work with area housing builders and developers and housing organizations to encourage public-private collaborations for the provision of new rental housing units – this action is on-going

Action 4F: Adams County Community Development will continue to work with area housing authorities and housing agencies and local lenders to distribute information about affordable or attainable housing mortgage programs in the area – begin early 2007 and continue as an on-going action

5. Limited supply of starter homes – With increasing home sale prices, there are very few homes available on the market that would be considered starter homes for households that are looking to buy their first home. The development of new starter homes is expected to take a collaborative effort between the public and private sector.

Actions:

Action 5A: Adams County Community Development and area housing agencies will pursue additional partnerships with public and private sources, for the development of new starter homes – this action is on-going

Action 5B: Adams County and the member organizations of the Housing Task Force will work with area housing builders and developers and housing organizations to encourage public-private collaborations for the development of new starter homes – this action is on-going

6. Language barrier – While improvements have been made over the past years in the amount of information that is available for Spanish-speaking residents, there are still instances where language is a barrier and in particular, for those residents who speak languages other than Spanish, where fewer translators are available.

Actions:

Action 6A: Adams County Community Development and area housing agencies will consider working with area educational institutions and organizations such as the Asian/Pacific Development Center and Colorado Refugee and Immigrant Services, to increase the access to translators and classes for those who need assistance with languages other than English – begin early 2007 and complete by mid-2007

Action 6B: Adams County Community Development will consider working with real estate and lending officials and area housing agencies to provide additional written materials in languages other than English – begin late 2008 and complete by mid-2009

7. Lack of resources (adequate income; adequate education and job skills; information) – Interviews with organizations and business representatives for this report commonly noted that inadequate incomes, as well as lack of education and job skills to earn an adequate income were significant barriers for residents. During focus group discussions, the difficulty in accessing information was raised by residents as a significant barrier and residents had a number of good ideas and suggestions for addressing this topic. Suggestions were made for improving the Section 8 waiting list process and concerns were raised about how Social Service customers perceive they are being treated.

Actions:

Action 7A: Adams County Community Development, Adams County Workforce and Business Center, and member organizations of the Housing Task Force will work with Adams County Economic Development and the Education Consortium to continue to identify ways of assisting in improving area income levels, increasing the number of jobs and in particular, higher paying jobs, and increasing job skills – this action is on-going

Action 7B: Adams County will work with area housing agencies and residents to seek ways of improving the distribution of information regarding housing and related services, including existing resource guides, 211 system, and publicity of Section 8 waiting list application periods – begin late 2006 and continue as an on-going action

8. Displacement/loss of housing units – Displacement of residents and a related loss of housing units has not happened very often in Adams County; however, if it does, finding new housing is very difficult for those displaced residents. There are expiring housing assistance contracts in 2006, as well as in 2009 – 2011. If these housing units become market rate units, there may be displacement occurring. The development of the Brighton Village Senior Apartments may also result in at least a temporary displacement. Housing stock that is in need of rehabilitation should be repaired and updated, so that these units are not eventually removed from the housing stock due to poor condition.

Action 8A: Area housing agencies will continue to provide support services for relocation, including housing counseling, to anyone that is displaced – this action is on-going

Action 8B: Adams County Community Development will work cooperatively and proactively with the area housing authorities, area housing agencies, housing providers, and owners of housing developments so that residents in existing housing units are not displaced – this action is on-going

Action 8C: Adams County Community Development and other agencies and organizations that provide housing rehabilitation funding will continue to promote the rehabilitation and retention of existing housing units – this action is on-going

9. Foreclosures and credit history problems: The high number of foreclosures is creating barriers for homeowners that lose their homes and suffer future credit problems as a result of the foreclosure. A history of bad credit is also a barrier for residents seeking rental housing, or first-time home buyers.

Actions:

Action 9A: The Adams County Housing Authority, member organizations of the Housing Task Force, lenders, area Housing Authorities and housing agencies that provide mortgage foreclosure counseling will work with the County Public Trustee's office to identify ways of providing effective foreclosure prevention for homeowners at early stages of foreclosure – begin late 2006 and continue as an on-going action

Action 9B: Adams County and the member organizations of the Housing Task Force will work with area credit agencies and organizations to identify ways consumers can improve their credit rating and provide this information to consumers – begin late 2008 and complete by late 2009

10. Lack of state regulations and standards governing mobile homes and mobile home communities – There are virtually no state regulations or standards that govern the operation of mobile home communities or the units within these communities. Given the large number of people in Adams County and its municipalities that reside in mobile homes, this is an opportunity to address an issue affecting affordable housing in the area.

Action 10A: Adams County and member organizations of the Housing Task Force will consider working with the Mobile Home Owners Tenant Association (MHOTA) or other mobile home tenant groups to explore options for encouraging the creation of mobile home regulations and standards at the state and local level – begin late 2008, complete by mid-2009

SECTION ONE

Background

This report is an update to the Analysis of Impediments to Fair Housing Choice report originally prepared in 1996 by Adams County Community Development staff. This 2006 update was conducted by Sherry Albertson-Clark of *Albertson Clark Associates* and has been prepared to meet the requirements of the U. S. Department of Housing and Urban Development (HUD) for entitlement counties and their communities. This update includes information specific to Adams County, as well as for the nine municipalities included within Adams County. These nine municipalities are Arvada, Aurora, Bennett, Brighton, Commerce City, Federal Heights, Northglenn, Thornton, and Westminster. Of these communities, Bennett, Brighton, Federal Heights, Northglenn, and Thornton are participants in an Intergovernmental Agreement for Community Development Block Grant (CDBG) funding which is administered by the Adams County Office of Community Development.

The consultant conducted data collection and analysis for this report through a review of published reports and studies and information available on websites, as well as interviews with staff and/or representatives of many of the participating agencies, organizations, and businesses listed on Page 15 of this report.

The intent of this update is to evaluate data used in the original report; review the impediments that were identified in the original report to determine if these impediments still exist; review the actions that have since been taken and evaluate the effectiveness of the actions taken; and identify any new impediments that may exist, as well as any actions that may be recommended to address any newly-identified impediments. The actions identified in this report are intended to affirmatively further fair housing choice, by reducing and/or eliminating the impediments that have been previously identified. The actions are intended to:

- ◆ analyze and eliminate housing discrimination in the community;
- ◆ promote fair housing choice for all persons;
- ◆ provide opportunities for racially and ethnically inclusive patterns of housing occupancy;
- ◆ promote housing that is physically accessible to, and usable by all persons, particularly persons with disabilities; and
- ◆ foster compliance with the nondiscrimination provisions of the Fair Housing Act.

1996 Adams County Impediments

The Adams County 1996 Analysis of Impediments to Fair Housing Choice report did not identify any specific impediments, but noted that the Office of Community Outreach will work with the Brighton Housing Authority, developers and non-profit housing providers and will “continue to increase the stock of affordable housing through homeownership opportunities, rental assistance, housing counseling and other assistance”. A dual approach was described in how to approach fair housing problems: educating the public and developing affordable housing options.

Participating Agencies, Organizations and Businesses

A wide variety of data were collected and analyzed for this report through a review of published reports and studies and information available on websites, as well as interviews with staff and/or representatives of many of the participating agencies, organizations, and businesses shown below.

Fair Housing Organizations

Colorado Civil Rights Division

U. S. Department of Housing and Urban Development - Office of Fair Housing and Equal Opportunity

Other Government Agencies

A-Lift

Adams County Community Development

Adams County Economic Development

Adams County Food Distribution

Adams County Headstart

Adams County LEAP

Adams County Social Services Department

Adams County Workforce & Business Center

Brighton Economic Development Corporation

City of Arvada Planning Department

City of Aurora Community Development Department

City of Aurora Planning Department

City of Brighton Community Development Department

City of Commerce City Department of Community Planning and Development Services

City of Federal Heights

City of Northglenn Grants Administration

City of Northglenn Planning Department

City of Thornton Business Development Office

City of Thornton Current Planning Division

City of Thornton Policy Planning Division

City of Westminster Department of Community Development, Building Division

City of Westminster Department of Community Development, Planning Division

Colorado Department of Labor and Employment
Colorado Division of Housing
Denver Regional Council of Governments
Regional Transportation District (RTD)
Town of Bennett

Advocacy Groups

Alternatives to Family Violence
Asian/Pacific Development Center
Brighton Senior Center
Children's Outreach Project
Colorado Affordable Housing Partnership
Colorado Aids Project
Colorado Coalition for the Homeless
Colorado Housing Assistance Corporation
Colorado Housing Counseling Coalition
Colorado Legal Services
Colorado Refugee and Immigrant Services
Community Housing Services
Community Reach Center
Community Resource Office
Elderly Housing Choices
Housing Justice
Legal Center for People with Disabilities and Seniors
Mobile Homeowners Tenant Association
North Metro Community Services
Northglenn Neighborhood Development Corporation
Retired & Senior Volunteer Program of Adams & Arapahoe Counties
Senior Resource Center
The Hispanic Advisory Council
The Senior Hub

Housing Providers

ACCESS Housing, Inc.
Adams County Housing Authority
Almost Home, Inc.
Arapahoe House
Brighton Housing Authority
Brothers Redevelopment, Inc.
Colorado Homeless Families
Growing Home
Habitat for Humanity of Metro Denver

Mercy Housing, Inc.
Rocky Mountain Mutual Housing
Thistle Community Housing

Banks and Other Financial Institutions

First Bank of Adams County
Key Bank
Mountain Pacific Mortgage
US Bank
Valley Bank and Trust
Wells Fargo Bank

Educational Institutions

Adams/Aurora School District #28J
Adams County School District #14
Adams County School District # 50
Adams Twelve Five Star School District #12
Aurora Community College
Bennett School District # 29J
Brighton School District #27J
Byers School District # 32J
Deer Trail School District # 26J
Front Range Community College
Keenesburg School District RE 3J
Mapleton School District #1
Wiggins School District RE 50J

Other Organizations, Businesses

Apartment Owners Association of Metro Denver
Beazer Homes
DR Horton-Melody Homes
Enterprise Foundation
Equal Housing Opportunity Partnership
Homebuilders Association of Metro Denver
KB Homes
McDermott Properties
METROLIST, Inc.
Metro Mayors Caucus
Metro Denver Properties Sold Metrolist
Mile High Housing Fund
North Metro Denver REALTORS Association
Realty 2000

General Public

Focus group participants - Participants numbered 59 and represented a broad cross section of residents of Adams County. Included were seniors, mobile home residents, families with children, Spanish-speaking residents, disabled residents, domestic violence shelter residents, minority residents, and residents of Hispanic origin.

SECTION TWO

Data Collection and Analysis

This section of this report is intended to provide a snapshot of data for Adams County and its nine municipalities. It focuses on changes that have taken place over the past ten years. In particular, this section focuses on the changes that have occurred in the local housing market. Data from the 2000 Census is available in most instances. In some cases, data is available for areas within the unincorporated areas of Adams County as well as for the municipalities included in the County, while in other cases, data is only available for the entire county. Some data is only available for the Denver PMSA (Primary Metropolitan Statistical Area), which includes the counties of Adams, Arapahoe, Denver, Douglas, and Jefferson while other data is only available for the Denver Region Council of Governments (DRCOG) which includes the counties of Adams, Arapahoe, Boulder, Broomfield, Clear Creek, Denver, Douglas, Gilpin and Jefferson. The time frames on which data is collected vary depending on who is collecting the data, as well as the nature of it. Census data is limited to the ten-year Census, as well as updates done via estimate. Other data may be collected monthly or annually. The majority of data collected for this report was done between May and July of 2006.

Adams County entered into a partnership with the Town of Bennett, and cities of Brighton, Federal Heights, Northglenn, and Thornton to provide administration and coordination for the Community Development Block Grant and HOME Investment Partnership Program funding. Since March 7, 2006 the municipalities of Commerce City and Watkins have joined the County partnership. The City of Westminster administers its own programs, but works cooperatively with Adams County. All nine communities will be included in this report, although the emphasis will still remain on the unincorporated areas of Adams County.

A. Demographics

Adams County is located at the northern edge of the Denver Metropolitan area. The county stretches 18 miles in a north-south direction at its widest point, covers over 70 miles in length in an east-west direction at its longest point, and encompasses 1,192 square miles. The eastern two-thirds of the county is predominantly rural with little population, and includes the Town of Bennett. The western areas of the county encompass all of the communities of Brighton, Commerce City, Federal Heights, and Thornton. Portions of Arvada, Aurora, Northglenn, and Westminster also lie within the boundaries of Adams County. The Rocky Mountain Arsenal National Wildlife Refuge is within Adams County and Denver International Airport, although annexed into the City and County of Denver, is surrounded by unincorporated Adams County. Map 1 in the Appendix illustrates the size of Adams County.

Adams County and its municipalities have experienced fairly significant growth over the past decade. Data from the 2000 Census showed the county's total population at 363,857 while in 1990, the population was 265,038 - an increase of 37.3% over this 10- year period. Map 2 in the

Appendix shows Adams County's Census Tract boundaries. In the six-county Denver Metropolitan area, Adams County accounted for 15.0% of the metro area population, based on 2000 Census data and 15.4% of the population, based on 2005 estimates. Table 1 below shows the total Adams County population, including both the unincorporated area, as well as the municipalities included within the county, as a comparison to the population of the DRCOG participating counties (aka Denver Metropolitan Region). Between 1990 and 2000, Adams County experienced population growth of 37.3%, while the Metropolitan Region experienced population growth of 29.9% during this same period.

Year	Population: Adams County**	Population: Denver Metropolitan Region
1990	265,038	1,859,008
2000	363,857	2,414,649
2005 est.	409,220	2,658,767
% Change 1990 - 2000	37.3%	29.9%

Source: Denver Regional Council of Governments (DRCOG).

*Denver Metropolitan Region refers to those counties participating in DRCOG (Adams, Arapahoe, Boulder, Broomfield, Clear Creek, Denver, Douglas, Gilpin, Jefferson)

**Adams County data includes unincorporated areas, as well as municipalities within the county

Population for the municipalities having all or a portion of their incorporated area in Adams County, are shown in Table 2 on the next page. The population numbers shown reflect the totals within that portion of the municipality that is within Adams County. The highest growth rate occurred in Thornton, Brighton, and Aurora between 1990 and 2000. Bennett and Northglenn saw the least amount of growth during that time. In Bennett's case, little development or annexation activity occurred, primarily due to a lack of demand, as well as a lack of utilities. In Northglenn's case, the community has very little land left for development.

Municipality	1990 Population	2000 Population	Average Annual % Change	% Change from 1990 – 2000
Adams County	265,038	363,857	3.2%	37.3%
Arvada*	2,347	2,847	2.0%	21.3%
Aurora*	27,747	40,249	3.8%	45.1%
Bennett	1,757	2,021	1.4%	15.0%
Brighton	14,186	20,751	3.9%	46.3%
Commerce City	16,466	20,991	2.5%	27.5%
Federal Heights	9,342	12,065	2.6%	29.1%
Northglenn*	27,195	31,563	1.5%	16.1%
Thornton	55,031	82,384	4.1%	49.7%
Westminster*	41,639	57,419	3.3%	37.9%
Unincorporated area	62,606	78,328	2.3%	25.1%

Source: U. S. Census Bureau

* Indicates municipalities located within multiple counties – only Adams County data has been included

Population projections by DRCOG for Adams County show the 2005 population at 409,334 and the 2030 county population at 674,860. This 25-year period (2005 – 2030) represents an increase of 64.8%, for an average annual growth rate of 2.59%. The communities of Federal Heights and Northglenn are virtually land locked, with little land area on which to grow, so population in these communities is expected to remain fairly stable. Both Thornton and Westminster have undeveloped areas with room to grow. The population projected for Thornton for the year 2020 is a population of 155,000. Westminster’s population is projected to be 123,900 with build-out of its Comprehensive Plan. There is no particular time frame associated with this population; however, based on the average number of new housing units constructed annually and with an expected additional 3,900 units to build-out, this population could be reached by about 2020.

Arvada, Brighton, Thornton, and Westminster have adopted growth pacing systems that are intended to slow the pace of residential construction. Most of these systems were adopted between 1999 and 2000, at a time when the metro area was experiencing tremendous residential development. Each community reviews development-related information and sets the maximum number of new residential building permits it will issue annually. While each community evaluates their own specific criteria in determining the annual residential building permit allocations, most consider such things as utility service capabilities; past residential growth; area and regional growth rates; local revenue; and expected future development. The annual number may include single-family and multi-family housing units, or specific maximum numbers for each housing unit type may be established. In recent years, these communities have not been reaching their annual maximums.

Table 3 below shows population and household forecasts for selected counties within the Denver Regional Council of Governments (DRCOG) region. The forecast population growth in Adams County between 2005 and 2030 equates to an increase of 265,526 persons, for an increase of 64.8%, while household growth in this period amounts to an increase of 104,696 persons, or an increase of 71.3%.

County	Population			Households		
	2005	2015	2030	2005	2015	2030
Adams	409,334	504,407	674,860	146,747	184,053	251,443
Arapahoe	537,924	630,612	801,285	212,579	253,343	329,224
Boulder	282,168	316,074	377,280	112,142	125,791	150,509
Broomfield	48,207	59,741	79,773	17,521	22,385	30,992
Denver	584,287	626,612	720,945	255,450	278,353	329,521
Douglas	224,933	319,362	489,665	80,141	115,461	180,015
Jefferson	539,941	598,593	706,808	213,262	237,722	283,255

Source: DRCOG Socioeconomic Forecast 2004 (Note: The DRCOG region also includes the counties of Clear Creek and Gilpin. These two counties were excluded from this table since they have less of a bearing on Adams Co.)

In 2000, the median age in Adams County was 31.4 years of age, up from the 1990 median age of 30.6. The median age in the municipalities within Adams County ranged from a low of 28.1 in Aurora, to a high of 34.9 in Arvada. The state median age in 2000 was 34.3. The trend toward an aging population is expected to continue as the baby boomers reach their senior years. The 2000 Census reported that 28,382 persons (or 7.8% of the population) in Adams County were 65 years of age or older. By the year 2020, nearly 10.0% of the Adams County population is expected to be 65 and older. Persons 65 or older accounted for 5.6% of the total population in Thornton and as high as 12.5% in the total population of Federal Heights. Adams County experienced the largest growth between the 1990 and 2000 Census in the 45-54 year old age range, which increased by 69.6%. The age range of 25 – 54 years old accounted for nearly half (46.3%) of the Adams County population in 2000.

Female and male populations are fairly evenly split, with the exception of Arvada (52.2% female, 47.8% male), Aurora (47.4% female, 52.6% male), Brighton (48.1% female, 51.9% male), Commerce City (47.8 % female, 52.2% male), and Federal Heights (51.3% female, 48.7% male). Table 4 on the next page illustrates median age, the population over the age of 65 years, and female/male population rates. The Colorado Department of Health released data in April of this year that shows a declining death rate in Colorado. In 2004, 28,227 Colorado residents died – the largest annual decline in deaths in 32 years. This trend was mirrored at the national level, as well, and is attributed to medical successes that are helping people live longer lives. Longevity in our population will also affect our future housing needs.

County/Municipality	Median Age	Population 65 and older	Population 65 and older (%)	Female Population (all ages - %)	Male Population (all ages - %)
Adams County	31.4	28,382	7.8	49.3	50.7
Arvada city (part)	34.9	225	7.9	52.2	47.8
Aurora city (part)	28.1	2,535	6.3	47.4	52.6
Bennett town (part)	30.9	113	5.6	49.1	50.9
Brighton city (part)	31.9	2,033	9.8	48.1	51.9
Commerce City (part)	29.8	1,931	9.2	47.8	52.2
Federal Heights city (part)	31.1	1,508	12.5	51.3	48.7
Northglenn city (part)	33.2	3,219	10.2	50.0	50.0
Thornton city (part)	30.8	4,613	5.6	50.3	49.7
Westminster city (part)	33.2	4,765	8.3	49.9	50.1
Unincorporated area*	33.2	7,440	8.9	48.1	51.9

Source: U. S. Census Bureau, 2000 Census

*Data from the 2000 Census included areas that are now within Broomfield County

Table 5, on the next page, compares 1990 and 2000 Census data for Adams County on race and Hispanic origin, and reflects an increasingly more diverse community. All races show an increase over the past ten years, with the largest increases (in percentages) occurring in persons of the "other race" category (222.3%), and Asian/Pacific Islanders (86.4%). The unusually large increase in the other race category is partially due to changes in racial category groupings since the 1990 Census, as well as including persons of multiple races. Persons of Hispanic origin increased as a percentage of the total population in Adams County, from 18.2% in 1990, to 28.2% in 2000. This increase reflects a national trend toward growing Hispanic populations in the United States. The White population in Adams County dropped from 86.9% of the total population in 1990, to 77.3% in 2000. These numbers and percentages are also reflective of state and national trends. As a community becomes more diverse, there are more services needed, and ideally, more being offered for persons for whom English is not their principal language. In particular, Spanish-speaking citizens now have greater access to translators for many services, with lenders, realtors, area non-profits, and service providers often providing bi-lingual staff or access to translators. There is also a growing concentration of Hmong immigrants in some areas of Adams County, particularly in the Thornton area.

A recent study by the Piton Foundation in Denver noted that in 2004, more children were born to Hispanic mothers (3,512) than to White mothers (3,416) in Adams County. Prior to this time, the majority of births had been to White mothers. This demographic shift is also occurring in Denver County. Map 3 in the Appendix shows the areas of minority concentration in Adams County by census tract. Most of the Census Tracts in Adams County has minority populations of

0 - 34% of the population. Areas of minority concentration are those areas that have a minority population of at least 35% of the total population in a particular Census Tract. Areas of minority concentrations are found in Aurora, Brighton, Commerce City, and in the unincorporated areas.

Table 5: Adams County Race and Hispanic Origin: 1990 - 2000

Race/Origin	1990 Census	2000 Census	% of Change 1990 - 2000	% of 2000 Population
African American	8,585	10,818	26.0%	3.0%
Asian, Pacific Islander	6,487	12,096	86.4%	3.3%
Native American, Eskimo or Aleut	2,430	4,321	77.8%	1.2%
White	230,355	281,231	22.0%	77.3%
Other, more than one race	17,181	55,391	222.3%	15.2%
TOTAL	265,038	363,857	37.3%	100%
Hispanic Origin	48,468	102,585	111.7%	28.2%

Source: U. S. Census Bureau

Of the communities in Adams County, Commerce City is the most diverse, with 34.4% of its population representing persons of non-White races and 52.9% of its population of Hispanic origin. Bennett has the largest White percentage of population at 94.6%, while Aurora has the smallest White percentage of population at 65.6%. Persons of Hispanic origin make up 38.2% of the population in Brighton. Aurora has the largest African American population at 13.4% of the city's population and Federal Heights has the largest percentage of Asian population, at 6.3% of its residents. Table 6 on the next page summarizes this information.

Table 6: Municipalities in Adams County*: Race and Hispanic Origin - 2000

Municipality	African American	Asian, Pacific Islander	Nat. American, Eskimo, Aleut	White	Other, More than One Race	Hispanic Origin
Arvada	.7%	2.3%	.7%	91.0%	5.4%	9.8%
Aurora	13.4%	4.6%	.8%	68.9%	12.3%	19.8%
Bennett	.5%	.7%	.7%	94.6%	3.7%	4.5%
Brighton	1.0%	1.1%	1.5%	76.9%	19.5%	38.2%
Commerce City	2.0%	.7%	1.7%	65.6%	30.0%	52.9%
Federal Heights	1.5%	6.3%	1.4%	80.0%	10.0%	22.6%
Northglenn	1.5%	3.2%	1.1%	83.0%	11.0%	20.3%
Thornton	1.5%	2.6%	1.1%	82.7%	12.1%	21.3%
Westminster	1.2%	5.6%	.7%	84.2%	8.3%	15.2%

Source: U. S. Census Bureau

* This data includes all portions of all of the municipalities

The number of households in Adams County in the 1990 census was 96,342 and that number increased to 128,156 households by 2000. Family households numbered 70,388 or 73.0% of the total number of households in 1990 and in 2000, accounted for 92,081 of the households (or 71.8%) in the county. A similar trend was apparent in the municipalities in the 1990 Census, with Federal Heights having the smallest percentage of family households, at 58.9% and Bennett with the largest percentage, at 80.0%. In 2000, Federal Heights still had the smallest percentage of family households, at 59.0%, while Bennett had the largest percentage, at 75.5%. Average household size in Adams County was 2.81 persons in the 2000 Census, up from the average household size of 2.75 persons in 1990. Average household size in the municipalities, based on the 2000 Census, ranged from a low of 2.35 persons per household in Federal Heights, to a high of 3.10 persons per household in Commerce City.

Average family size in Adams County was 3.27 persons in the 2000 Census and households headed by females numbered 15,524 or 12.1% of all households in the county in 2000. This reflects an increase in the number of households headed by females over the 1990 Census, when there were 11,794 such households. Average family size in the Adams County municipalities ranged from a low of 2.97 persons per family in Federal Heights, to a high of 3.51 persons per family in Commerce City. Female heads of household accounted for a low of 9.6% of households in Westminster, to the highest percentage of 16.4% of households in Commerce City.

In the 2000 Census, persons over the age of 5 with disabilities numbered 61,512 persons, or 16.9% of the total population in Adams County, while the 1990 Census showed 50,522 persons (or 19.0%) with a disability. Persons over the age of 65 with a disability totaled 12,246 or 44.3% of the senior population in 2000, while in 1990, 45.6% had some type of disability. In the 2000 Census, 61.9% of persons with a disability were employed, while persons without disabilities had

an employment rate of 80.1%. Of those with a disability in Adams County in 1990, 16.4% were employed, contrasted with 73.2% employment for persons without a disability. In the municipalities within Adams County in 2000, Westminster had the lowest percentage of the five year and older population with a disability (13.9%), while Commerce City had the highest percentage, at 24.1% of the population. Bennett had the highest percentage of persons 65 years and older with a disability (63.0%), while Northglenn had the lowest, at 37.9%. These higher percentages are driven by having a larger proportion of older residents in many of these communities. As the general population continues to age and the number of age-related disabilities increases, this number is expected to significantly increase, particularly as the baby boomers age and become seniors.

B. Education

There are 12 different school districts serving the students of Adams County. These districts are listed in Table 7 below and include enrollment figures for the most recent school year. Adams 12 Five Star School District # 12 has the highest enrollment, while Deer Trail School District #26J has the lowest enrollment. Student/teacher ratios are the lowest in Deer Trail and the highest in the Strasburg School District #31J – two of the smallest districts serving Adams County. With such a large and diverse student population (27.81% are of Hispanic origin), Adams 12 Five Star schools has the Hispanic Advisory Council working with the district's superintendent. The Council's values and principles include diverse opinions, open communication, honesty, respect, and equal rights and opportunities for all.

District	Enrollment	Student/Teacher Ratio
Adams/Aurora School District #28J	32,251	18.7:1
Adams County School District #14	7,031	17.8:1
Adams County School District # 50	10,671	16.7:1
Adams 12 Five Star School District #12	37,437	19.7:1
Bennett School District # 29J	1,175	17.1:1
Brighton School District #27J	10,534	17:1
Byers School District # 32J	469	15.1:1
Deer Trail School District # 26J	201	9.6:1
Keenesburg School District RE 3J	2,026	13:1
Mapleton School District #1	5,898	20:1

District	Enrollment	Student/Teacher Ratio
Strasburg School District #31J	900	20.7:1
Wiggins School District RE 50J	613	11:1

Source: 2006 Community Profile – Adams County Economic Development, 2005

Adams County School District #50 operates a program called VOICES. This program is intended to bridge the gap between the school district and the diverse community it serves. VOICES focuses on providing resources and referrals for such things as housing, employment and health care; community education and involvement on topics such as parenting skills, financial planning, and home buying and improvement; district staff support and development; and a language academy for English as a second language for adult community members, and Spanish as a second language to district employees. According to a publication by the Adams County Education Consortium, there are 62 different languages spoken in Adams County.

Educational attainment is lower in Adams County as compared with the Colorado attainment levels, based on DRCOG community profile data. For persons over the age of 25 years, 17.3% in the county have a bachelor or graduate degree, or higher, compared with 32.7% in the state, and 36.4% in the DRCOG area. In unincorporated Adams County, the attainment level is even lower, at 12.2% of the population. Of the municipalities in Adams County, Commerce City has the lowest levels of attainment, with 3.7% of the population over 25 years of age having either a bachelor or graduate degree, or higher while 31.3% of Westminster's population has a bachelor or graduate degree, or higher.

The Adams County Head Start program has been in operation for over 40 years, providing basic skills to prepare children for future school success. Services are provided for low-income qualifying families and children in the Aurora, Brighton, Commerce City, Federal Heights, Thornton, and Westminster areas. The majority of the centers are located in areas where low-income households comprise at least 50% of the area population. A key philosophy of the Head Start program is parental involvement. Resources are provided for parents, including workshops, crisis intervention, and referrals. During the 2004- 2005 program year, 575 children were served at nine Head Start centers. Approximately 40% of the families served by the Adams County Head Start program are Spanish-speaking, while 50% of the teachers speak Spanish.

There are several post secondary educational institutions located in Adams County. Students at the Front Range Community College, which is located in Westminster, numbered 24,238 unduplicated students in 2004 – 2005. Front Range offers Associates degrees and also has a Brighton Center in addition to its campuses in Westminster, the Boulder County campus in Longmont, and the Larimer County campus in Fort Collins. DeVry University, also located in Westminster, offers Masters degrees and had a 2005 enrollment of 500 students. The University of Phoenix has a Northglenn branch offering Doctorate degrees and had a 2005 enrollment of 215 students. Aurora is home to the Community College of Aurora, with 4,600 enrolled students

and Columbia College, which offers associates and bachelors degrees and currently has nearly 400 students. Other colleges and universities are located within the Denver metro area and are in fairly close proximity for Adams County residents to attend.

C. Income Data

The average annual household income in the metro Denver area in 2005 was \$37,794. Per capita income for the metro area in 2005 was \$28,694 which yielded an average hourly rate of \$13.80. The Adams County average annual wage in 2005 was \$38,378 while the 2000 annual average was \$33,427 – an increase of 14.8% over five years. Average hourly wages for specific occupations in Adams County ranged from a low of \$6.50 per hour in the personal care and service; to a high of \$47.82 per hour in the architecture and engineering occupations.

Table 8 below shows the employment sectors and related employment figures for Adams County for the 2005 annual average. The sectors having the largest percentages of jobs were government (13.72%), construction (12.02%), retail (10.69%), and manufacturing (9.50%).

Sector	Number of Jobs	% of Jobs
Agriculture, fisheries & forestry	1,143	.78
Mining	236	.16
Utilities	922	.62
Construction	17,738	12.02
Manufacturing	14,026	9.50
Wholesale trade	13,629	9.23
Retail trade	15,792	10.69
Transportation & warehousing	13,714	9.29
Information	1,983	1.34
Finance & insurance	2,923	1.98
Real estate, rental & leasing	2,829	1.92
Professional & technical services	3,944	2.67
Mgmt. of companies & enterprises	1,406	.95
Administrative & waste services	9,484	6.42
Educational services	1,518	1.02
Health care & social assistance	9,533	6.45
Arts, entertainment & recreation	997	.68
Accommodations & food service	10,946	7.41
Other services	4,652	3.15
Non classifiable	4	0
Government	20,266	13.72
TOTAL	147,685	100.00%

Source: Colorado Department of Labor & Employment, Labor Market Information, 2005

A major construction project that is currently underway in Commerce City is the construction of a new \$50 million soccer stadium for the Colorado Rapids, Colorado's Major League Soccer team, expected to open in 2007. Along with the stadium are planned a retail and office center, as well as a new civic center for Commerce City. Relocation of the Rapids from their current home

at Invesco Field at Mile High to Commerce City will shift this entertainment and recreation industry and its related revenues to Adams County. The construction and development related to the redevelopment of the Fitzsimons and Stapleton areas and associated E-470 work account for much of the increase in the number of jobs in Adams County.

The median household income for 2005 in Adams County was estimated by the Census Bureau to be \$50,650 while the 2000 median household income was reported during the last Census at \$47,323. This reflects a 7.0% increase over five years. In 2000, the Denver metro region had a median household income of \$52,328. Median household incomes in the municipalities within Adams County in 2000 ranged from a low of \$33,680 in Commerce City, to a high of \$56,323 in Westminster. The 2005 estimated median family income for Adams County is \$56,053. Map 4 in the Appendix shows median household income in Adams County by Census Tract, based on information from the 2000 Census. Those households with the lowest median household incomes (up to \$34,018) are found in Census Tracts in portions of Aurora, Commerce City, Federal Heights, Thornton, and Westminster, as well as in unincorporated Adams County.

The Effective Buying Index (EBI) is a measurement of the amount of buying power or disposable income, after personal tax and non-tax payments are subtracted, for a household. The Adams County EBI in 2005 was \$17,770. This number increased by \$2,384 (or 15.4%) since 2000. Compared to the Denver metro area, Adams County had the lowest EBI of the seven metro counties, while Douglas County had the highest EBI at \$31,234 in 2005.

Data on household income for Adams County shows 32,036 persons (or 8.9% of the population) living below poverty levels, based on 2000 Census data (poverty status data for the 2000 Census was based on 1999 status). Of these, the largest group was individuals 18 years of age and older, which accounted for 20,375 (or 63.6%) of the population. Adams County had 5,989 families (or 6.5% of all families) living in poverty, with 44.0% of these families headed by a female. Poverty data for the communities in Adams County show that Westminster had the lowest percentage (10.5%) of female-headed households living at or below poverty levels, and Commerce City had the highest at 25.6% of its families. While Aurora had the largest number of such households (2,180), the percentage of households living at or below poverty levels that had a female head of household accounted for 16.7% of the households living at poverty levels.

For the 2000 Census, poverty is defined as a household of one having an annual income of \$8,350 or less. A family of four is at the poverty level when their income is at or below \$17,050. Adjustments for 2006 put these poverty level figures at \$9,800 for a household of one, and \$20,000 for a household of four persons. Many seniors, minorities, and persons with disabilities live at or below poverty levels. Of the 9,900 households in Adams County that were living at or below poverty levels in the 2000 Census, 1,572 of these households (15.8%) were people 65 years or older. Poverty data by race from the 2000 Census reveals that 63.3% of families living below poverty levels in Adams County were White, while 7.0% were African American, 3.0% were Asian, 1.2% were Native Americans, and 1.0% were Native Hawaiians/Pacific Islanders.

Other races accounted for 19.4% of families at or below poverty levels and 5.0% were families of two or more races. Hispanic or Latino families accounted for 47.4% of families living in poverty.

The National Low Income Housing Coalition's *Out of Reach 2005* report has calculated that in Colorado, a housing wage of \$16.01 per hour, working 40 hours per week, 52 weeks per year, is the minimum needed to afford a two-bedroom apartment unit at fair market rents. This correlates to an annual income of \$33,294 needed to afford rent on a two-bedroom apartment unit with a rent of \$832. A two-income household earning the minimum wage of \$5.15 per hour still falls short by \$5.71 per hour of earning a housing wage. Another way to consider these numbers is that in Colorado, a minimum wage earner must work 124 hours each week to afford rent for a two-bedroom unit, or 3.1 minimum wage earners must work 40 hours a week, 52 weeks a year to earn a collective housing wage. The average hourly wage in Adams County in 2005 was \$13.80 – well below the housing wage. The fair market rent figure used for a two-bedroom unit in Adams County is \$889 per month for Fiscal Year (FY) 2006, which is down from \$973 for FY 2005. The fair market rent proposed for HUD in FY 2007 for a two-bedroom unit is \$909 and unless revised, will become effective October 1, 2006. Housing affordability typically means spending no more than 30% of a household's income on rent. In 2003, there were 3,947 housing units in Adams County that were categorized as having deep subsidies. This term refers to rental housing where the household's contribution is based on their monthly income and the remaining rent is paid by a federal subsidy. The majority of these (2,083) were Section 8 housing units.

D Employment Data

In 2005, the annual average number of persons employed in Adams County was 190,706 from a work force of 202,468 persons. The average annual unemployment rate in Adams County for 2005 was 5.8%. Data for July of 2006 shows 197,834 persons employed from a work force of 209,063 and an unemployment rate of 5.4%. The July 2006 year-to-date unemployment rate is slightly lower, at 5.3%. While Adams County's unemployment rate is dropping somewhat, it still remains higher than the July 2006 year-to-date rate for metro Denver of 4.7% and the Colorado rate of 4.6%. The rise in unemployment in past years has typically been due to layoffs and downsizing in area businesses that were related to the high tech and manufacturing industries, while new jobs were created in the construction industry and transportation industries.

The Colorado Department of Labor and Employment has projected future employment by industry sub-sectors for the Denver-Aurora MSA. Between 2005 and 2007, these projections show 41,975 additional jobs, or an increase of 3.6% in the number of new jobs for the metro area. Job categories with the largest expected increases are specialty trade contractors; food services; professional, scientific, technical services; and administrative and support services. Between 2004 and 2014, a total of 342,395 new jobs are expected in the metro area, for a 29.7% increase over this 10-year period. These jobs are expected to be in the professional/scientific/technical services; educational services; administrative and support

services; and specialty trade contractor areas. With the exception of the food services sector, these jobs tend to pay some of the higher wages in the metro area.

Projections made by the Denver Regional Council of Governments show that 22% of all new jobs created in the metropolitan area will be in Adams County and are expected to occur in the air transportation, life sciences, logistics, and manufacturing sectors of the economy. These projections are primarily based on the fact that Denver International Airport (DIA), the redevelopment of Fitzsimons, and the E-470 toll road are all located within Adams County and amount to three of the four billion dollar-plus projects underway in the metropolitan area. A portion of Adams County is an Enterprise Zone, where tax credits are available to businesses locating within this zone for such things as making capital investments, job training programs, and creating new jobs. The Enterprise Zone includes much of the Town of Bennett, as well as the area generally located at the confluence of I-76, I-25, I-270 and US 36 and the corridor generally located north of I-70, between Brighton Boulevard and Highway 2, north to 168th Avenue. Enterprise Zones are also located in some of the municipalities in Adams County.

There are four key industry segments that form the overall economic base of the Denver Metropolitan area and that also have a notable presence in Adams County. These four segments are aviation, life sciences, logistics, and software/information technology/telecommunications. A review of the ten largest employers on Table 9 below shows key representatives of these industry segments in the largest employers. These ten employers accounted for jobs for 9,924 employees.

Company	Number of Employees
United Parcel Service (UPS)	2,600
Avaya Communications	1,711
EchoStar Communications	1,350
University of Colorado at Denver Health Services Center	800
Wagner Equipment Company	800
University of Colorado Hospital at Fitzsimons	700
Shamrock Foods Company	588
FedEx Ground	500
FedEx Freight East	475
Company	Number of Employees
HVH Transportation, Inc.	470
TOTAL	9,924

Source: 2006 Community Profile - Adams County Economic Development

The Adams County Workforce and Business Center is located at 12200 Pecos Street, in the Adams County Western Service Center. This center is located in an area that is easily accessible by the public transit system, Regional Transportation District (RTD). RTD offers free fares for children five and under and reduced fares for persons 65 years of age and older, students 6 – 19 years of age, persons with disabilities, and those on Medicare. All RTD buses are wheelchair lift-equipped. A special phone line offers route information for persons with hearing or speech impairments. The system operates between the hours of approximately 5:00 A.M. to midnight, although some routes begin earlier and run later into the evening and early morning hours. Service is available throughout the metro area, linking key locations such as the Workforce Center, housing complexes, schools, colleges and universities, hospitals, senior centers, shopping, and employment areas; however, one person interviewed for this report told of a trip her husband took for jury duty from their home to the Adams County Courthouse in Brighton that took nearly 2.5 hours one way.

Other workforce training sites and facilities are located throughout the metropolitan area. The newly-formed Adams County Education Consortium (ACEC) brings together the education and business segments of Adams County to enhance academic skills development, career knowledge and exploration, and relevant work skills for all residents of Adams County. Members of this innovative consortium realize the importance of a skilled and educated work force and include the Adams County school districts, post-secondary educational institutions, local governments, community-based organizations, and the business community.

Para-transit service is available for persons with disabilities thru A-Lift, Adams County Community Transit and is a partnership between the county, and the cities of Arvada, Commerce City, Federal Heights, Northglenn, Thornton, and Westminster. This program offers transportation service for Adams County residents 60 years and older, or any person with a disability, regardless of age. The service operates between the hours of 8 AM and 4 PM, Monday through Friday on a donation basis. Trips are scheduled by calling the Seniors' Resource Center and may be used for transportation to medical and dental appointments, grocery stores and/or congregate meal sites. A-Lift provides over 15,000 rides annually to residents over 60 years of age and/or those with disabilities. RTD also offers Access-a-Ride to its riders that have disabilities. This is a curb-to-curb reservation service for those who cannot use the fixed route buses of RTD because they are unable to board, ride, or exit the wheel chair lift-equipped buses or cannot get to and from a bus stop. Subscription service for regular trips made by Access-a-Ride participants can also be scheduled. Participation in Access-a-Ride requires a functional evaluation and certification of disability in order to use this service. Trips on Access-a-Ride must begin and end within ¼ mile of a non-commuter fixed route and fares are currently \$3.00 each way, which is double the cost of a typical RTD fixed route cash fare.

RTD also offers the Neighborhood ECO Pass program to neighborhood organizations. This program provides a discounted annual bus pass for unlimited travel on all local, express, regional, Call-n-Ride, light rail, and skyRide to DIA routes. A customized price is provided by

RTD, based on the number of housing units in a neighborhood area. A contract between the neighborhood organization and RTD is negotiated. Neighborhood participants are issued a photo id and have essentially unlimited usage of the RTD system. To date, only neighborhood organizations in Boulder have taken advantage of this program, but it is available for organizations within Adams County, or other counties and municipalities served by RTD.

A new comprehensive transit plan is underway, FasTracks, which includes new light and commuter rail lines, park-n-ride spaces, and transit stations. Adams County will play a key role in this plan, with 15 new rail transit stations and 14 new park-n-ride locations planned throughout the county. New transit improvements in Adams County will be focused on the I-25, US 36, and I-225 corridors. Bus service is also expected to be expanded, providing many more opportunities for alternative modes of transportation for the future. FasTracks has a 12-year schedule for the completion of its planned facilities. Improvements and construction of facilities in Adams County are scheduled for 2014 for the East Corridor Rail (east to DIA) and 2015 for the North Metro Corridor Rail (north to 160th Avenue aka SH 7). The North Metro Corridor will provide service to the area between I-25 and I-76 and will include eight rail stations. This corridor will connect Thornton, Northglenn, and Commerce City to the metro area and provide a connection to DIA via a rail transfer at Union Station. The East Corridor will provide 23.6 miles of commuter rail from Union Station to DIA. This line will include five new rail stations, including one at the Stapleton redevelopment site.

Transit oriented developments (TOD's) are planned along several key rail lines in Adams County and are planned to provide a mix of housing, employment, and shopping opportunities. A key element is the location of new housing developments – particularly for low and moderate income individuals and families – that are in proximity to alternative transportation mode centers, such as light rail lines and stations. The City of Thornton has approved transit oriented development plans for the 88th Avenue Station and has rezoned property adjacent to the 124th Avenue Station to transit-oriented zoning. Other communities are working on TOD's in their respective areas.

E Housing Profile

According to DRCOG data, Adams County was the third fastest growing county (17.0%) in the Metropolitan Region between 2000 and 2004 in the number of new housing units constructed. Only Douglas County (35.7%) and Broomfield County (20.5%) saw more new housing units built during this four-year period. Based on information provided by METROLIST, Inc. the average sales price for a detached, single-family home in Adams County (including both unincorporated and incorporated areas) in 2005 was \$228,682. In 2005 there were 5,899 detached, single-family homes sold. During the first five months of June 2006, the average sales price for a detached, single-family home had dropped to \$216,562 and 2,260 homes had sold. The average sales price for attached single-family (town homes, condominiums) had also dropped from \$149,005 in 2005 to \$141,998 for the first five months of 2006. Table 10 on the next page provides information on home sales between 2003 and 2006 for homes sold within

Adams County.

Table 10: Adams County Home Sales: 2003 – 2006*				
Year	Average Sales Price Detached Single-family	Number Sold	Average Sales Price Attached Single-family	Number Sold
2003	\$218,933	4,109	\$151,982	921
2004	\$220,593	6,133	\$149,655	1,031
2005	\$228,682	5,899	\$149,005	994
2006*	\$216,562	2,260	\$141,998	433

Source: METROLIST, Inc.

* Data for first five months of 2006

In the 1990 Census for Adams County, 65.1% of all occupied housing units were owner-occupied, while rental units accounted for 34.9% of the occupied units. By 2000, the percentage of owner-occupied units had increased to 69.8% while rental units dropped to 30.2% of the total number of occupied housing units. In the municipalities of Adams County, Thornton has the largest percentage (77.7%) of owner-occupied housing units, followed very closely by Bennett, which has 77.3%. The smallest percentage of owner-occupied units are found in Commerce City (60.3%) and Federal Heights (60.5%).

Despite these increases, minority households have not seen the same increases in home ownership. Based on 2000 Census data, 73.0% of the owner-occupied housing units were owned by Whites and 66.0% were owned by Asians. The lowest percentage of owner-occupied housing units were owned by African Americans at 41.2%. Housing Colorado's 2006 Facts Book notes that an estimated 41,000 Hispanic, 15,000 African American, and 6,000 Asian renter households in Colorado have adequate incomes to purchase a home priced at 75% of the 2003 state median price, but there are very few homes available in this price range. Participants in the County's Community Needs Assessment noted that a lack of homeownership in a neighborhood or community is often viewed as a barrier to creating a sense of community.

A July 7, 2006 article in the Rocky Mountain News titled "Home sale prices in June set new record" showed that the average price of a single-family home in June 2006 in the metro area rose to \$335,111 – nearly \$20,000 above the average in May of this year. The median price was up to \$261,750 which was up nearly \$11,000 from May's median price. This article also noted that 31,900 unsold homes were on the market, up from the previous record set in May of 30,457. A review of recent metro home sales publications for existing homes within Adams County found a wide price range, starting with a two-bedroom, 1 bath condominium designated for first time homebuyers in Brighton for \$69,900; a Westminster condominium for \$80,000; and a Thornton town home for \$92,400. Detached single-family dwellings ranged from three-bedroom, 1 bath homes in Brighton for \$114,750 and \$128,000; a fixer upper in north Aurora for \$145,000; two-bedroom homes in Commerce City for \$142,450 and \$155,000; three-bedroom homes in Brighton for \$164,950 and \$168,950; a five-bedroom home in north Aurora for

\$166,500; and three and four-bedroom homes in Thornton for \$175,000 and \$199,000.

According to a June 2, 2006 article in the Denver Post, the resale prices of existing homes in the Denver metro area fell in the first quarter of 2006. Home prices fell 0.35% between January and March of 2006 for existing homes. This was the first time in at least 16 years that Denver area home prices have dropped. The large number of homes for sale, as a result of job loss and/or foreclosures, as well as the large number of new homes being constructed, has led to downward price pressure on older, existing homes.

New home prices for a single-family home started in the \$160's (thousands) in Brighton's Water Tower Park, while town homes in Thornton started in the same price range. Single-family homes in Commerce City started in the \$150's. New town homes in the Bennett - Strasburg area started in the \$120's. The upper range for new homes in Adams County developments was primarily in the mid-\$200's – high \$300's.

An April 23, 2006 article in the Denver Post looked at what the metro area's median home price of \$238,500 in February of 2006 would buy in the counties of the metro area. In Adams County, a 2,689 square foot, 5-bedroom home built in 1965 in Northglenn was listed for \$238,500 while a 740-square foot home built in 1952 in Denver was also initially listed at the same price. In this article, a local realtor noted that “traditionally, home prices have been lower in Adams County” while another realtor added that looking for a home at the edges of the metro area is another way to find housing at or below the median home price.

The Colorado Division of Housing hired ValueWest, Inc. to analyze county single-family home sales data using assessor's records in 64 Colorado counties in early 2004 to estimate the cost of housing. This analysis projected values for various sizes of homes for each county. In Adams County, a 1,500 square foot home was projected to be worth \$222,638 as of January 1, 2003 and the same home was valued at \$233,586 one year later. This represents an increase of 4.9%. Similarly, a 2,000 square foot home was valued at \$296,851 as of January 1, 2003 and at \$311,448 as of January 1, 2004 – also a 4.9% increase. Data used for this analysis was from January 1, 2001 through June 30, 2002.

A local and national trend is that the number of foreclosures is increasing rapidly. Colorado has led the country in the number of foreclosures for the first six months of 2006, with 5,928 properties in some stage of foreclosure in June of 2006. This means that for every 280 occupied homes in Colorado, one is in foreclosure. An article in the June 18, 2006 Denver Post titled “Homeowners in Brighton Skid Down Uneasy Street” told the story of 23 foreclosures that have occurred in a Brighton neighborhood of 94 homes. The neighborhood consists of duplex units that were built starting in 1999. Many of the buyers, who were first time home buyers, used financing that required little or no money down and had adjustable interest rates, which is considered a high-risk loan situation. In some cases, home buyers had two mortgages to cover the full cost of their housing unit and many refinanced, or added financed improvements to their

homes. As interest rates increased, home owners had difficulties keeping up with their payments and in some cases, lost jobs or had other circumstances occur that left them without a home. At the time of foreclosure, some home owners owed more money than their unit was worth, yet many of the foreclosed homes sold for less than the original purchase price just several years before. The high number of foreclosures in this neighborhood also impacts other homeowners since other property values fall as a result of foreclosure auctions. In many cases, people who are in danger of being foreclosed on wait too late to try to do something about their mortgage. The Adams County Housing Authority is looking at ways of working with the Adams County Public Trustee's Office to assist in foreclosure prevention with homeowners earlier, while they still have options available to consider in lieu of foreclosure. Based on the current pace of foreclosures in Adams County, the Public Trustee expects over 4,000 sales of foreclosed homes to be held in 2006.

A HUD Colorado online database allows research on Colorado foreclosed properties and a number of private real estate companies provide online lists as well. As of July 12, 2006 there were 19 properties, single-family homes and town homes or condominiums, listed as HUD homes in Adams County available for purchase. Listed prices ranged from \$59,900 for a town home in Aurora, up to a single-family detached home in Commerce City and one in Thornton, both listed at \$220,000. There is also a special listing of homes on this website that are only available for purchase by police officers, teachers, firefighters, and EMT's. Bank-owned homes are also listed and included several homes in Thornton and Westminster, ranging in price from \$142,500 - \$267,800. A review of all of the foreclosed properties on this website makes it clear that foreclosures can occur at any home price range – with one foreclosure priced at over \$1 million; however, the vast majority of foreclosures are occurring at much lower home prices, with the median listed price on the HUD Colorado site at \$170,000 for a 1,612 square foot home in Aurora. Foreclosures are expected to continue as many loans that were interest only, or had adjustable rates, are adjusted in 2006 and 2007. The Mortgage Bankers Association of America estimates that Adjustable Rate Mortgages (ARMs) now account for about 25.0% of the more than \$8.5 trillion in outstanding mortgage loans. In mid-March of 2006, delinquencies reported by the Mortgage Bankers Association of America were at 4.7%, up from 4.38% in March of 2005. The rate of delinquency for loans with ARMs was 5.72%. The October 24, 2006 Adams County Public Trustee's New Foreclosures Report listed 118 properties, of which 83 (or 70.3%) had ARMs. Original interest rates on these homes ranged from a low of 1.25% to a high of 11.99%.

A new law, HB 06-1387, known as the 2006 Foreclosure Act, went into effect July 1, 2006 (several provisions go into effect July 1, 2007). This law overhauls Colorado's real estate foreclosure law and is the first major set of revisions since 1990. It is intended to give homeowners a greater period of time to retain ownership of their homes by combining the period allowed to cure the default (45 – 60 days before foreclosure sale) with the time that previously allowed the owner to redeem the property by paying all outstanding costs (75 days after foreclosure sale; 120 days after sale for agricultural property). This combined time period (120 –

135 days) now occurs before a foreclosure sale and allows homeowners more time to learn about the foreclosure process and their options. It may also reduce predatory activity against homeowners, by eliminating the post-sale redemption period. The property owner will no longer be entitled to redemption of the property since they have a longer period to correct their default. Other legislation related to foreclosures was enacted in May and June of this year, to regulate foreclosure consultants and equity purchasers (SB 06-71); registration of mortgage brokers (HB 06-1161); and HB 06-1323, which addresses theft by deception in residential real estate mortgage lending.

Manufactured or mobile homes are a more affordable housing option for some households. There are a large number of existing mobile home parks throughout Adams County, with concentrations occurring in Federal Heights and Thornton. There were 13,003 mobile homes in Adams County in the 2000 Census, up 12.7% from 1990. These housing units account for nearly 9.8% of the existing housing stock in the county. One-half (50.3%) of Federal Heights' housing units were mobile homes in 2000, while Thornton had 10.4%, or 3,101 of its housing units in mobile homes. Most of the mobile home parks were developed in the late 1960's and early 1970's and are like small cities within a city to residents. Over 1,800 members, representing about 750 mobile home communities statewide are members of the Mobile Homeowners Tenant Association (MHOTA). Mobile home communities in Adams County are experiencing vacant lots, as well as vacant homes within the communities. This may be due, in part, to the large number of homes that are for sale in the area that are reasonably close in price to what it costs to own a mobile home and pay monthly lot rent. One interesting note is that foreclosures on mobile homes are not included in real property foreclosure data. As a result, the number of mobile homes that may be foreclosed on would account for even higher foreclosure rates.

The vast majority of mobile homes and mobile home communities are found in Thornton. These communities are Redwood Estates, Friendly Village, Valley View, Woodland Hills, Pine Lakes Ranch, and Thornton Mobile Estates. Mobile homes recently listed for sale ranged in price from \$13,900 for a 2 bedroom, 1 bath home 728 square feet in size, up to a new home with 3 bedrooms and 2 baths for \$65,900. These prices are strictly for the home itself and do not include land lease rates or land costs for purchasing a lot on which to place the mobile home. Some spaces have become available as park owners convert what were originally approved as single-wide lots to larger lots that will accommodate the newer, double-wide units. Manufactured homes on permanent foundations are usually treated as a single-family dwelling in most communities. This means that these homes can be placed on any lot that can accommodate a stick-built single-family - unless there are covenants that preclude the use of manufactured units in a particular development, or if the municipality has limitations on the placement of what are often referred to as modular units or homes. One recent ad offered lots of approximately 2.5 acres in size in the metro area for modular homes to be placed on a permanent foundation. The asking price for these lots was \$57,900.

A potentially serious issue to consider is that many of the existing mobile home units in Adams

County mobile home parks are too old to move to other locations. If owners of mobile home parks decide to redevelop the park at some time in the future, the vast majority of the homes will not be able to be moved, leaving many owners with few housing options since their mobile home usually represents their primary investment. Also, since lots are leased, tenants of mobile home parks have no control over increasing lot rents, which in some cases, have increased every year. The residents of Pioneer Village Mobile Home Park have seen increases of about \$26.00 each year for the past several years. Another park charges up to \$525 for monthly rent and the tenant is also responsible for paying all utilities. In most cases, the owners of mobile home parks purchase utilities for the park and then resell them to tenants at even higher prices. During the focus groups held for this study, mobile home residents raised concerns about the lack of regulation of mobile home communities and the condition of some units that are within these communities.

Between 2000 and 2004, 27,078 building permits were issued in Adams County for new housing units. Table 11 below shows the number of residential building permits by year issued and by residential type. These numbers include all areas located within Adams County and indicate the actual number of housing units for which building permits were issued; they do not confirm whether all of the housing units were completed and certified for occupancy. The majority of these permits were issued for single-family housing units, with the largest number of these units showing in 2004. Multi-family units, or those units where two or more are attached, accounted for a high of 2,342 units in 2000. The highest total number of housing units was permitted in 2002, with 5,909 new housing units. New construction valuation nearly doubled, from \$499.1m in 2002 to \$828.2m in 2004. The largest increase in valuation during this five-year period was in single-family housing units, which increased from \$343.0m in 2000 to \$758.2m in 2004.

Units	2000	2001	2002	2003	2004
Single-Family	2,883	3,825	4,402	4,100	4,494
Two-family	78	64	128	66	54
Three or four-family	91	57	62	50	194
Five or more family	2,173	1,692	1,317	728	620
TOTAL	5,225	5,638	5,909	4,944	5,362

Source: Denver Regional Council of Governments

The Home Builders Association of Metro Denver also tracks building permit activity. Through the end of May, 2006 there were 9,733 building permits issued in 2006. Of these, 5,789 were for single-family detached homes; 3,445 were for single-family attached; and 499 were for apartments. While Denver led the list with 1,927 building permits, Aurora accounted for the majority of the single-family detached permits (1,086) and single-family attached (215) in the Adams County municipalities. The new apartment units are in Arvada and Lakewood. Unincorporated Adams County accounted for 173 permits to date, the majority of which are single-family detached (146). Commerce City has issued 448 permits (380 single-family detached; 6 single-family attached), while Federal Heights and Northglenn have issued one and

two single-family detached permits, respectively. Compared to the previous year-to-date, the metro area is on a somewhat faster construction pace, with total permits issued being up by 1,477 permits over last year – a 17.9% increase. This increase has occurred in the single-family attached units, which have more than doubled since May of 2005. Meanwhile, single-family detached permits are down by 10.7% over last year and apartment units are up by 75.0%.

As of 2005, Brighton accounted for 15,345 housing units that were in process, approved, and/or under construction and in northern Commerce City, another 24,484 units have been approved. The Todd Creek area in Adams County accounted for another 8,300 housing units that are approved and/or under construction. In addition, 4,000 housing units are approved and/or under construction in Silver Peaks, in the Lochbuie area. Projections from the Brighton Economic Development Corporation are that by the year 2015, there will be more than 25,000 new households and 55,000 new jobs in the Brighton/Commerce City area. Federal Heights and Northglenn has little land area left for residential development. Arvada, Brighton, Thornton and Westminster have enacted growth pacing systems. These systems were adopted in response to the rapid residential growth that was occurring in the late 1990's.

Rental rates in Adams County have increased since the fourth quarter of 2001, when a one-bedroom apartment averaged \$719.05 and a two-bedroom apartment averaged \$820.93 (with one bath). At that same time, the average rent for all units was \$820.24. By the end of 2005, a one-bedroom apartment averaged \$704.75 and the average rent for all unit types was \$825.21. Table 12 on the next page illustrates average rental rates from the quarterly survey prepared for the Colorado Division of Housing. In 2004, 10,075 rental households paid 35% or more of their income for rent – making them rent burdened. This data includes all areas within Adams County.

Quarter/Year	2001	2002	2003	2004	2005
First Quarter	1 bdm – 692.97 2 bdm – 760.86 3 bdm – 975.43 All units – 787.75	1 bdm – 673.00 2 bdm 776.95– 3 bdm – 1020.25 All units – 768.31	1 bdm – 660.35 2 bdm – 767.00 3 bdm – 1005.36 All units – 762.61	1 bdm – 686.07 2 bdm – 758.11 3 bdm – 1029.83 All units – 801.00	1 bdm – 689.86 2 bdm – 735.63 3 bdm – 1089.30 All units – 801.38
Second Quarter	1 bdm – 701.27 2 bdm – 783.72 3 bdm – 976.57 All units – 789.06	1 bdm – 671.77 2 bdm 770.53– 3 bdm – 962.13 All units – 768.49	1 bdm – 673.87 2 bdm – 763.86 3 bdm – 974.20 All units – 772.21	1 bdm – 669.88 2 bdm – 712.08 3 bdm – 1004.99 All units – 783.13	1 bdm – 698.94 2 bdm – 777.58 3 bdm – 1165.81 All units – 828.08
Third Quarter	1 bdm – 700.79 2 bdm – 795.94 3 bdm – 976.73 All units – 792.45	1 bdm – 693.21 2 bdm – 770.16 3 bdm – 998.95 All units – 793.54	1 bdm – 703.14 2 bdm – 761.02 3 bdm – 1063.52 All units – 803.49	1 bdm – 699.31 2 bdm – 767.07 3 bdm – 1002.58 All units – 803.86	1 bdm – 700.75 2 bdm – 742.85 3 bdm – 1097.69 All units – 822.49
Fourth Quarter	1 bdm – 719.05 2 bdm – 820.93 3 bdm – 972.35 All units – 820.84	1 bdm – 693.84 2 bdm – 772.79 3 bdm – 1019.13 All units – 790.29	1 bdm – 667.37 2 bdm – 741.59 3 bdm – 989.86 All units – 777.00	1 bdm – 676.85 2 bdm – 752.44 3 bdm – 1058.40 All units – 796.81	1 bdm – 704.75 2 bdm – 764.63 3 bdm – 1097.08 All units – 825.21

Source: Multifamily Housing Vacancy and Rental Survey prepared for the Colorado Division of Housing by Dr. Gordon von Stroh

A review of apartments listed for rent in Adams County in the Apartments for Rent publication showed apartment rents ranging from an efficiency unit in Arvada at \$395 per month, to a three-bedroom in Westminster renting for \$1,245. One-bedroom units typically ran \$480 - \$575, while three bedrooms ranged from \$700 - \$1,245. One complex in Arvada offers 4-bedroom units, while the vast majority are one and two-bedroom units, with some three-bedroom units. Rent for homes ran higher, ranging from a low of \$595 per month in Commerce City, to a high of \$1,600 in Aurora. Several apartment complexes specifically advertised that Section 8 residents were welcome and others included income limits in their ads. While many ads included the Fair Housing logo, very few included information regarding accessibility for persons with disabilities in their ads. Several ads included the notation that Spanish was spoken, or that translation was available.

According to the quarterly Multifamily Housing Vacancy and Rental Survey conducted by Gordon Von Stroh of the University of Denver, the vacancy rate for Adams County at the end of 2005 was 8.1%, compared to the Metro Denver average of 7.9%. In comparison, the metro Denver area's vacancy rate at the end of 2005 was 7.9% and dropped to 7.4% for the first quarter of 2006. Table 13 below provides five years of data reflecting rental vacancy rates in all areas within Adams County. Vacancy rates have ranged from a low of 3.1% in early 2001, to a high of 16.2% in the 2nd quarter of 2003. Since 2003, vacancy rates have generally been decreasing. As foreclosure rates increase, rental vacancy rates are expected to decrease, as some former home owners become tenants of rental properties. An apartment vacancy report for the Brighton area, prepared by Almost Home, Inc., revealed a total of 1,215 apartments and 69 vacancies, for a vacancy rate of 5.6% as of March 13, 2006. Vacancies were generally dropping, from a high of 8.6% in January 2005, to a low of 4.0% in October of 2005. Near the end of 2005, vacancy rates in the Brighton area were beginning to climb. This pattern reflects a very similar pattern in the vacancy rates shown for 2005.

Quarter/Year	2001	2002	2003	2004	2005
First Quarter	3.1%	9.4%	13.7%	9.6%	10.6%
Second Quarter	5.3%	9.1%	16.2%	9.9%	8.7%
Third Quarter	5.9%	9.1%	12.6%	7.6%	7.7%
Fourth Quarter	8.9%	11.9%	12.1%	11.7%	8.1%

Source: Multifamily Housing Vacancy and Rental Survey prepared for the Colorado Division of Housing by Dr. Gordon von Stroh

Between 2000 and 2004, building permits were issued for 7,374 new multi-family units - most of which were constructed in the municipalities of Adams County. This new construction has contributed to a higher vacancy rate and will probably continue to do so, until the new units are absorbed by the local housing market. It is important to note that there are still very few vacant, affordable, and decent apartment units for households of very low incomes, or those families whose incomes were under 50 percent of the area median income for families. Most of the vacancies in rental units tend to occur at the higher rent levels. The percentage of housing units that are renter-occupied has dropped in Adams County from 31.0% in 1990, to 29.4% by 2000, with a corresponding increase in home ownership. In Adams County, 70.6% of households are now owner-occupied households.

The Colorado Blue Ribbon Panel on Housing was formed to identify tools and strategies to provide long-term housing affordability for Colorado citizens of all income levels. The panel issued its final report in March of 2006 after working on this issue for 13 months. During that time, roundtables were held in six areas around the state, including a roundtable held in the Denver metro area. Several areas of need were identified at this round table, including shelter beds and transitional housing for homeless families and individuals; affordable rental properties; and down payment assistance and self-help housing for those seeking homeownership. Points

noted in the report from the Denver roundtable included drive till you qualify (a willingness to live where homes are affordable and suffer longer commutes to work) as the mantra of many working families; and that the median-priced home in the metro area of \$245,000 requires an annual household income of \$75,000. Adding childcare and healthcare costs to households able to attain a \$75,000 annual income, however, often makes homeownership unattainable. One of the most significant points to be stressed in the panel's final report is the relationship of workforce housing to Colorado's long-term economic stability. Housing our workforce in safe, decent, and affordable housing is vital to the economic health and stability of our state. The panel's recommendations cover five areas: strategic partnerships; data collection and delivery; improving access to housing services; new funding solutions; and public policy development.

Adams County has supported housing through its participation in and support of the Housing Task Force, which was formed in 1995. The Task Force's mission is to "enhance economic growth and the vitality of the County by promoting the creation of balanced communities through a united coalition of businesses, government, developers and community groups". The Task Force includes staff of Adams County Community Development, Economic Development, Housing Authority, and Planning and Development; representatives of many of the municipalities within the county, and representatives of many of the non-profit agencies that are involved in providing housing and related services throughout the county. Other members of the Task Force include representatives of the lending, real estate, and development industries, and the Colorado Division of Housing. Adams County's housing needs were also evident in the Community Needs Assessment, conducted in May of 2004 by Corona Research. This assessment was done to identify community needs and assets, as well as identify gaps in services, particularly for low and moderate income residents of the county. Housing was a key component in this assessment.

The Fair Market Rents (FMR) for FY 2006 for existing housing in the Denver PMSA (which includes Adams County) were released by HUD last year, to be effective October 1, 2005 through September 30, 2006. These rent levels represent the maximum which can be charged for public-assisted housing. These rates are \$616 for an efficiency apartment; \$702 for a one-bedroom; \$889 for a two-bedroom; \$1,262 for a three-bedroom apartment; and \$1,471 for a four-bedroom apartment. Fair Market Rents for larger units are calculated by adding 15% to the FMR for each additional bedroom. With a recent average market rent of \$825.21 (Colorado Division of Housing Survey, 4th Quarter 2005), some units may still not be affordable for some individuals or families.

Northglenn and Westminster have programs in place for the upkeep of rental housing units. In Northglenn, the non-resident property owner must register with the City at least once every five years so that the property owner can be contacted about any code violations and held responsible for fixing violations that exist in their housing units. Westminster has a Rental Property Maintenance Code to address deterioration of its aging rental housing stock. This program results in inspections of multi-family housing units once every four years for a building that is 6 –

20 years old. Buildings over 20 years old are inspected every two years. Single-family, duplex units and hotels/motels are inspected on a complaint basis. This program has resulted in many improvements to rental housing in Westminster, particularly in the southern areas of the city.

Housing Colorado is a partnership of affordable housing developers, service providers, realtors, financial institutions, and local, state, and federal officials interested in educating, informing and advocating for affordable housing in Colorado. Housing Colorado estimates that there is a shortage of over 100,000 affordable housing units in Colorado. When Adams County collected public comments during the County's Community Needs Assessment, housing was the third most critical need identified by participants in a survey and focus groups related to this assessment.

As housing costs have increased, costs for food, utilities, and transportation have also increased. As a result, the Adams County Food Distribution Center has seen an increase in the demand for its services. The Center, opened in the mid-1980's, serves an estimated 35,000 individuals annually. During the four days the Center is open for distribution (Tuesday – Friday), an estimated 200 – 250 households receive food each day and can come to the Center two times each week. In addition to households that pick up their food at the Center, another 16 food pantries and 25 non-profit agencies also receive food from the Food Distribution Center. Of those households served by the Center, 72% are rental households, while 28% are home owners. Seniors over the age of 55 account for 23.4% of the Center's registered households, while 46.6% are the working poor. Two-thirds of the Center's customers live in Aurora, Commerce City, Thornton, and Welby, an unincorporated area in Adams County. Of these, 42.8% reside in Commerce City. This high percentage may be due, in part, to the Center's location in the Commerce City area. Participants in focus groups held for this study noted that "the Food Bank is one Adams County program that works".

A video produced for Housing Justice, a Colorado interfaith organization, illustrates the typical expenses and difficult spending decisions a family of four earning \$19,307 or less a year (living in poverty) must make. In this video, housing costs an average of \$5,329 annually; utilities cost \$2,309; transportation in a used car costs \$4,920; food costs an average of \$4,102; health care costs \$2,132; and child care costs an average of \$2,300. These costs leave a deficit of \$1,785 and the costs for other necessities such as toiletries, shoes and clothing, school supplies, insurance, etc. have not even been factored in. This video illustrates the difficult choices and decisions that must be made daily by many families in Colorado.

E. Summary

The following information provides a snapshot of Adams County:

- Population has increased in Adams County since the 1990 Census by 37.3%. Persons of Hispanic origin increased by 111.7% during this period and by an average of 22.7% in the municipalities of Adams County.

- The disabled population is increasing in size, particularly with the aging of the baby boomer generation. In 2000, 16.9% of the county population over the age of five had a disability and 44.3% of persons 65 and older had a disability.
- Housing costs in Adams County have increased significantly in the past four years, with average home sale prices increasing by 4.4% and average apartment rents increasing by 7.8% over this period.
- The vacancy rate for rental units was 8.1% at the end of 2005, meaning rents may level off or drop as a result of the abundance of housing units on the market.
- The rate of owner-occupied housing units in Adams County has increased to 70.6% while renter-occupied housing units have decreased to 29.4% of all housing units.
- The gap between income and housing costs has widened in Adams County, as wages have increased an average of 2.96%, home prices have increased by an average of 4.9%, and rents by an average of 1.95% annually.

F. Maps

The following maps for Adams County are included in the Appendix of this report:

Map 1: Adams County

Map 2: Census Tract Boundaries

Map 3: Minority Concentration by Census Tract

Map 4: Median Income by Census Tract

SECTION THREE
Evaluation of Current Fair Housing Legal Status

A. Fair Housing Complaints

Federal fair housing laws prohibit discrimination on the basis of race, color, religion, sex, national origin, mental or physical disability, or familial status in the sale or rental of housing; home mortgage lending; and purchase of homeowner's or renter's insurance. Also, it is against the law to refuse to make reasonable accommodations for persons with disabilities, or to harass or interfere with anyone exercising their fair housing rights. Colorado law adds marital status, creed, and ancestry to the federal basis for discrimination, and the City/County of Denver adds sexual orientation, military status, age and parenthood (families with children under the age of 18) to the federal and state basis for housing discrimination.

In Colorado, housing discrimination complaints are filed with the Department of Housing and Urban Development's (HUD) Office of Fair Housing and Equal Opportunity (FHEO) in Denver. Housing discrimination complaints may also be filed with the Colorado Civil Rights Division (CCRD). Between FY 2002 and FY 2006, there have been 35 housing discrimination complaints filed with FHEO on properties located within Adams County. This includes complaints filed on properties located in unincorporated Adams County, as well as within the municipalities located in the County. This data is summarized on Table 14 on the next page, as is the issue and status of each complaint.

Housing complaint data provided for this study by FHEO reveals 35 complaints filed with HUD between October 1, 2001 and July 12, 2006. Of the 35 complaints filed, there were seven from Aurora; five from Brighton; seven from Commerce City; two from Federal Heights; eight from Thornton; and six from Westminster. The largest number of complaints were filed during FY 2002 and FY 2003, which was from October 1, 2002 through September 30, 2004. (Note: HUD is on the federal fiscal year, which runs from October 1 through September 30). Based on the vacancy rates shown in Table 13 on Page 29, there is no apparent correlation between vacancy rates during FY 2002 and FY 2003 and the large number of housing discrimination complaints filed during that time period. Vacancy rates ranged from 11.9% in the fourth quarter of 2002, to 7.6% during the third quarter of 2004. It would be logical to expect a higher number of housing complaints when vacancies are low, as landlords may tend to be more selective in leasing to tenants when housing is in short supply. When vacancy rates are high, as they currently are, landlords are competing against other landlords for tenants and as a result, may not tend to be as selective in choosing their tenants. This is apparent now, as some landlords forego criminal background and credit history checks and application fees to make it easier to find tenants.

Of the complaints filed, 4 were related to a resident with a mental disability and 9 were related to a physical disability. These 13 complaints resulted in nine no cause determination, two conciliation/resolution agreements, and two withdrawn after resolution. Five complaints

involved retaliation of some nature. Of these complaints, three resulted in no cause determination, one was withdrawn after resolution, and one complainant failed to cooperate. The race and/or Hispanic origin of the complainants were not provided on all complaints, but where given, totaled ten African Americans, one Native American, and one Asian. Eight of the complaints were from residents of Hispanic origin. The majority of the complaints (25 out of 35, or 71.4%) were related to rental properties, while four (11.4%) were related to the sale of housing. Based on the data provided by FHEO, it is not clear whether the remaining six complaints were related to the sale or rental of housing.

Table 14: HUD Fair Housing Complaints, FY 2001 - FY 2006*			
Year	No.	Issue**	Status (basis for closing complaints)
FY 2002	7	5 discriminatory terms – 3 rental, 1 sale 3 failure to make reasonable accommodation	3 withdrawn by complainant without resolution 2 conciliation/resolution agreement 1 withdrawn by complainant after resolution 1 no cause determination
FY 2003	8	2 refusal to rent 3 discriminatory financing 7 discriminatory terms – 6 rental, 1 sale 2 discriminatory acts - coercion 4 failure to make reasonable accommodation	2 complainant failed to cooperate 1 conciliation/resolution agreement 1 withdrawn by complainant after resolution 4 no cause determination
FY 2004	11	1 refusal to rent 1 discriminatory financing - loan 8 discriminatory terms – 7 rental, 1 sale 3 discriminatory acts -- 2 coercion, 1 other 3 failure to make reasonable accommodation	1 withdrawn by complainant after resolution 10 no cause determination
FY 2005	3	3 discriminatory terms – 3 rental 1 discriminatory acts - coercion	3 no cause determination
FY 2006	6	1 refusal to rent 4 discriminatory terms – 4 rental 2 discriminatory acts - coercion	3 no cause determination 3 cases remain open
TOTAL	35	4 refusal to rent 4 discriminatory financing 27 discriminatory terms – 24 rental, 3 sale 8 discriminatory acts 7 failure to make reasonable accommodation	2 complainant failed to cooperate 3 withdrawn by complainant without resolution 3 conciliation/resolution agreement 3 withdrawn by complainant after resolution 21 no cause determination 3 cases remain open

Source: U. S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity

*FY 2006 data is through July 12, 2006 ** There may be more than one issue for a single complaint

Based on the housing complaint data provided by HUD's Office of Fair Housing and Equal Opportunity, there is some level of housing discrimination occurring in Adams County. While many of these complaints were found to have a no cause determination, others were found to have valid issues and were, for the most part, resolved by some level of intervention or mediation. While 35 housing discrimination complaints are not very many for such a large and populated urban county, there are potentially many more complaints that may never be pursued. It takes persistence to file and pursue a discrimination complaint and many who may experience discrimination may not have the time or energy to pursue a complaint since they are in the process of seeking shelter for themselves and their families. Many people may not realize they've been discriminated against until later, and some never realize it, as discrimination can be done in very subtle ways. Two areas to concentrate on are increasing awareness and education about rental properties and housing for persons with disabilities. These appear to be two common themes in where housing discrimination complaints are originating.

Conclusion: Based on housing discrimination complaint data, discrimination is occurring in the municipalities of Adams County and is an impediment to fair housing choice.

The Adams County Housing Authority gives out a fair housing brochure each time they provide housing counseling to someone. There may be instances where someone believes they are being discriminated against – for example, not being chosen as a tenant because they smoke – when this is not a valid basis for a discrimination complaint. There are other organizations such as Colorado Legal Services, the Legal Center for People with Disabilities and Seniors, and the Colorado Coalition for the Homeless Fair Housing Hotline that receive calls regarding housing discrimination. These calls are generally referred to the Colorado Civil Rights Division (CCRD) or to HUD. Some of the organizations contacted for this study noted that the recent tendency appears to be focused more on affordable housing (due to the high cost of housing) rather than on housing discrimination issues. The Denver office of Colorado Legal Services has seen an 8.2% increase in the overall number of housing cases from 2004 to 2005. These cases include landlord/tenant issues, evictions, and foreclosures. Overall, Colorado Legal Services has seen their caseload for all types of cases increase by 14.8% between 2004 and 2005.

Housing Justice is a Colorado interfaith organization whose goal is to eliminate the affordable housing shortage in Colorado. Housing Justice hopes to make affordable housing available to all Coloradans by the year 2022. This organization is working in Aurora and Brighton, and in Salida and Trinidad, providing outreach and community organizing. The Housing Justice staff has created a curriculum to dispel the myths about affordable housing and in particular, NIMBYism – or Not in My Back Yard – attitudes that often surface when affordable housing developments are proposed. Housing Justice has sponsored educational workshops and in 2004, organized and led an 850-mile People's Walk for Housing Justice around Colorado to raise awareness about the need for affordable housing. Housing Justice has also worked on rehabilitating homes in the Brighton area for seniors and families with disabled family members.

A series of focus groups were held about fair housing to collect information for this report. Seven focus group meetings were held, with 59 residents participating to complete surveys and discuss their survey responses and housing experiences as a group. Four people at the focus group meetings expressed any past experience with housing discrimination. In one instance, it was a single parent seeking to move from a domestic violence shelter to transitional housing. After interviewing for a space in transitional housing with an agency, she was told that they would notify her several days later. She received a call saying there was no space within a short time later and perceived that this was discrimination because the call came back so quickly. The other instance involved a single mother who believed she was a victim of reverse discrimination at Social Services because she is White and has children. She believes many of the staff persons at Social Services are of minority or ethnic origins, so she did not think she received equal assistance. Another noted that she feels discriminated against by RTD bus drivers, and a fourth believes that some landlords will not rent to people with children. None of these individuals pursued a complaint. While there was not enough information provided to determine if discrimination was involved or not, it is clear that these individuals have a perception that they were discriminated against and for most people, perception becomes reality.

The Adams County Community Needs Assessment, completed in 2004 by Corona Research, Inc., included a survey of 1,200 residents, as well as a series of focus groups on a variety of topics. Included in the survey was a question regarding housing discriminations. Participants were asked how common they believe discrimination is in the housing market. Six percent of those believed discrimination is very common, while 15.0% believed it is somewhat uncommon. The rest of those surveyed believed discrimination was uncommon (14.0%), rare (14.0%), not occurring (14.0%), or did not have an opinion (37.0%). The lower the income someone earns, the greater they feel that discrimination occurs in housing. Of those surveyed with incomes less than \$10,000, 38.0% believed housing discrimination is very common or somewhat common. Thirty-five percent of Hispanic participants believed that housing discrimination is occurring, with 9.0% believing it is very common, and 26.0% believing it is somewhat common. While 18.0% of African Americans surveyed believed that housing discrimination was very common and 42.0% believed it was somewhat common, the researchers noted that the African American sample size was too small to be statistically significant. The same was true of multi-racial respondents, where 20.0% believed housing discrimination was very common, and 18.0% believed it was somewhat uncommon.

B. Identification of Fair Housing Concerns or Problems

Impediments to fair housing choice include any action, omission or decision taken because of race, color, religion, sex, disability, familial status, or national origin that may restrict housing choices or the availability of housing choices. This section addresses housing problems related to discriminatory and illegal practices, as well as general and specific local housing concerns that may occur. The discriminatory and illegal practices listed below are examples and definitions of the kinds of discrimination that could occur in a community with respect to housing, which are

considered illegal under the provisions of the Fair Housing Act and are not intended to imply that these practices are occurring in a community.

1. Discriminatory and Illegal Practices

Advertising or printing and/or publishing, or causing the printing and/or publishing of any notice, statement or advertisement in the sale or rental of a dwelling which shows preference, limitation, or discrimination.

Blockbusting is the unethical real estate practice of creating fear by moving one or more households of another race or creed into a neighborhood, then exploiting the situation by urging residents to sell their homes at deflated prices.

Control of listings is when a real estate agent or broker refuses to list a home or rental because it is minority-owned or because of the neighborhood in which it is located.

Discrimination in the provision of brokerage services may result when a minority or disabled real estate agent or broker is denied membership in a multiple listing directory or other organization.

Lending practices are discriminatory when different credit standards are used to qualify minority and non-minority home buyers. In addition to race, such things as marital status, age, sex and number of dependents may also be the basis for discriminatory lending practices.

Rental practices discriminate against minorities, families, seniors, or persons with disabilities when a landlord charges higher rent for equivalent units, misrepresents information concerning unit vacancies, requires larger security deposits and/or uses different or higher standards of tenant approval.

Steering is the practice of directing a prospective buyer away from a certain property due to a person's race, color, religion, sex, disability, familial status, or national origin.

Many of the discriminatory practices described above may occur unknowingly. When discrimination occurs in the area of housing, it encourages segregated living patterns and housing markets. These discriminatory practices are often difficult to see, document, and prove. Those who have been discriminated against must bring charges of housing discrimination to the attention of local, state or federal authorities in order to detect and enforce against such illegal practices.

2. General Housing Concerns

Preferences:

The Adams County Housing Authority accepts applications for housing assistance on a time and date of application, first come-first served basis and most recently opened the waiting list in June of this year. Although HUD dropped the requirements for housing preferences, the Adams County Housing Authority retained these preferences, which are based on housing need. Over 1,200 applications for Section 8 housing assistance were received during the two days the waiting list was open. The Housing Authority administers 1,330 Section 8 Housing Choice Vouchers that may be used anywhere in unincorporated Adams County or in Commerce City, Denver, Federal Heights, Northglenn, Thornton, or Westminster. In addition, another 204 portable vouchers and/or certificates and 58 from outside Adams County are administered by the Housing Authority, accounting for 1,592 vouchers and certificates. The Authority also owns and operates 35 scattered site public housing units which are single-family detached homes in Westminster and unincorporated Adams County, most of which, are three-bedroom homes. Residents of these homes have household incomes at or below 50% of area median income. Forty-two public housing apartments for seniors and/or the disabled at Casa Redonda de Vigil are in unincorporated Adams County. Over 1,000 multi-family housing units at locations such as Aztec Villa, Creekside Place Apartments, and the Village of Greenbriar are also owned and operated by the Housing Authority and the Authority partners on an additional 600 housing units. The Adams County Housing Authority celebrated its 30 year anniversary in 2004 and over the past 30 years, estimates are that 30,000 families have received Section 8 assistance, while public housing has assisted 1,435 families.

During Fiscal Year 2005, the Housing Authority provided housing counseling to 7,529 individuals and families. Counseling assistance was given in the areas of pre-purchase homebuyer counseling (152); foreclosure prevention (620); home equity and/or mortgage refinancing (137); finding and/or retaining rental housing (6,073); and finding emergency or transitional housing (547). Those seeking assistance on rental housing accounted for 80.7% of all requests for assistance, followed by 8.2% of all requests which were in foreclosure prevention. This data highlights the emphasis placed on securing and retaining safe, decent and affordable housing. Other programs offered by the Housing Authority including homebuyer education and counseling for first time homebuyers; financial assistance for rent or mortgage and/or utilities; guidance and support for residents; and family self-sufficiency support to help families move from economic dependence to economic self-sufficiency. The Housing Authority, in concert with Adams County Community Development and City of Westminster, offers down payment assistance for low income first time home buyers through HOME funds. This assistance can be used to buy a home in Westminster or in unincorporated Adams County and is in the form of a deferred loan. The Housing Authority has been offering housing counseling services since 1978. A key trend that Housing Authority staff is seeing is that the people seeking housing counseling and assistance are the working poor – people who have jobs and a steady

income, but their income may not be adequate for today's housing costs. In the past, the unemployed accounted for the vast majority seeking assistance from Housing Authority staff.

Aurora's Housing Authority has 333 Certificates and 1,083 vouchers for housing assistance payments. Public housing consists of 121 units for seniors and 80 units of scattered site housing for families. The Housing Authority recently funded the rehabilitation of 376 Section 8 housing units and constructed 93 senior units at Fletcher Gardens. The Housing Authority also operates 339 non-assisted housing units that are scattered throughout Aurora. The waiting list for housing assistance currently has 5,215 families on the list, with the majority (57.8%) being families with children. Eight percent of the families on the waiting list are seniors. The Aurora Housing Authority provides assistance to Aurora residents who live within Adams County, although waiting list preferences often mean that these residents receive a lower priority on the waiting list.

The Brighton Housing Authority has 44 units of public housing - 28 units are for seniors 62 and older; 16 units are 3-4 bedroom units for larger families - and administers 212 Section 8 vouchers and certificates. The Housing Authority also owns 15 scattered site units in duplexes and single-family detached homes. The Authority's waiting list has about 360 applications waiting for housing assistance, which means a wait of 3 - 3-1/2 years. There are plans for a private developer to develop 123 two-bedroom housing units, known as Brighton Village, on land owned by the Housing Authority. Phase one of this development consists of 60 units, while phase two has 63 units. Development would mean removal of existing apartment buildings on the site. A common area is also planned between the buildings. The units will be reserved for senior residents meeting various income levels, with 30% of AMI having 12 units; 40% AMI 24 units; 50% AMI 19 units; and 60% AMI 5 units. The developer will receive tax credits and fee reductions and waivers from the City of Brighton. The Housing Authority will own the development after 15 years, based on their investment of the land for this development. Over the next several years, the Housing Authority has plans to develop another 180 housing units in Brighton to expand as the city grows.

The Commerce City Housing Authority provides 80 Section 8 vouchers and as part of their affordable housing partnerships, owns 112 apartments at the Pinecrest Apartments and 75 apartments at Conter Estates for adults age 55 and over. The current number of households on the waiting list at the Housing Authority is approximately 375, which is expected to result in a three-year or longer wait for housing assistance.

Westminster's Housing Authority owns and operates Westminster Commons, a 130-unit complex that provides affordable housing to seniors whose incomes are at 60.0% of median income or below and persons with disabilities. The Authority has recently partnered with Community Builders to construct the first 17 of 50 work-force housing units in South Westminster.

Expiring Housing Assistance Contracts:

There are four apartment developments that have expiring housing contracts in the next several years. Dawson Square Apartments in Thornton will have an expiring contract in September of this year for 36 units. The remaining contracts will expire in 2009 – 2011 and could potentially affect 70 housing units in Commerce City. If a housing contract expires, the Adams County Housing Authority (or other local authority) will typically work with the property owner(s) to encourage them to keep rents below market rate and when possible, will provide Section 8 housing vouchers for those families eligible for assistance. In some cases, residents have been able to remain in their apartments with vouchers, while others have had to move when units went to market rates because they could not afford the higher, market rate rent. This is typically not as critical an issue during times when rental vacancies are high, as is the current rental market; however, when the rental market is tight and vacancies are low, the potential for rents to increase to market rate is much greater.

3. Specific Housing Concerns

While the Adams County Community Needs Assessment considered other topics, housing was identified as one of the top three needs in Adams County. This assessment included over 1,200 resident surveys of Adams County residents, conducted by phone and door-to-door. Thirteen focus groups were also held in a variety of areas throughout the county to collect more specific information from each of these target groups. The results of the assessment were presented at a public meeting in June of 2004 and were followed by roundtable discussions to more specifically discuss the top four needs. These top needs were education; economic development; housing; and public safety. Based on the survey results gathered during the Needs Assessment, it can be construed that nearly 14,000 Adams County households were at immediate risk of losing their home during the past twelve months (twelve months prior to 2003), due to rent or mortgage costs. Of Adams County households surveyed, 21.0% of households said that housing discrimination is common or very common and this was particularly true of Hispanic households. The need for more homeless housing, retirement housing, and starter homes was also expressed by Adams County residents.

Housing Needs of Persons with Disabilities

The number of persons with disabilities is expected to increase, as those of the baby boomer generation become seniors and begin to develop age-related disabilities. The 2000 Census data showed that 16.9% of the population between the ages of five and 65 had some type of disability. Of the population over 65 years of age, 44.3% had some type of disability and this number is expected to continue to increase as the population ages. Housing Colorado's 2006 Facts Book notes that Colorado's Supplemental Security Income (SSI) payment of \$564 a month for an individual leaves only \$167 for rent and utilities – only 22% of the average Colorado rent of \$772 per month – and rent had increased to an average of \$825 per month by the end of 2005.

North Metro Community Services assists the developmentally disabled in Adams County. These individuals have limitations that may affect their capability to care for themselves, mobility, and/or earning an income. North Metro provides housing for their clients in host homes, where a maximum of two clients are housed per home, as well as in four group homes in Adams County. In addition to housing, North Metro provides supported living services and adult day services, including employment and sheltered employment, transportation, and learning and socialization programs. Two waiting lists are kept at North Metro: one is for supported living services, which is typically a 3 – 5 year wait, while the comprehensive services list is even longer. These long waits are a result of decreasing funding at the state and federal levels.

Some communities are adopting a new approach to providing accessible housing. Often referred to as visitability, this approach is to build practical homes for residents of all abilities. The five features of practical homes include at least one level entrance into the home; minimum 32" wide doorways; minimum 36" wide clear passage throughout the main floor of the home; a usable bathroom on the main floor with reinforced walls to support grab bars; and reachable electrical plugs and switches. Building new dwellings with these features would insure disabled residents and/or visitors unimpeded access. This may be a design approach to pursue, particularly since the number of persons with disabilities is expected to continue to increase in the future.

The Home Builders Foundation (HBF) is the philanthropic arm of the Home Builders Association of Metro Denver. This organization provides renovation and remodeling of area homes for persons that are disabled, children that have debilitating illness, or for victims of accidents and crime. The HBF was created in 1993 and since 1997, has focused on removing physical barriers and making home improvements for individuals and families with special needs. In 2005, home builder volunteers completed projects in the metro area valued at over \$800,000 for individuals and families with special needs.

Housing Needs for Single Heads of Household with Children

The 2000 Census showed 15,524 (or 12.1%) of all households in Adams County had a single female head of household and 7,559 households (or 5.8%) were led by a single male. It is particularly difficult for single parent households with children to find affordable housing, since the cost of housing is so high. Added to housing costs are child care costs if the children are pre-school age, or if the single parent does not have a support network to assist with child care. Single parents who have a disabled child have an even more difficult time finding decent housing that they can afford and that accommodates disabilities that family members have. Based on 2000 Census data for Adams County, 5,989 families were living below the poverty level and 2,635 or 44% of these families were led by single females. Single male heads of household accounted for 9.1% of families living in poverty. Approximately 90.0% of the families assisted by ACCESS Housing, inc. are headed by a single female and approximately 60.0% of the Colorado Homeless Families participants are single heads of household.

Housing Needs for the Homeless

The Metropolitan Denver Homeless Initiative (MDHI) conducted its seventh annual point-in-time survey of homeless individuals and families on January 23, 2006. This survey includes Adams, Arapahoe, Boulder, Denver, Douglas, and Jefferson Counties. On that day, there were 793 known homeless people in Adams County. The vast majority (47.8%) were children and youth, up to and including 19 years of age. Over one-third (36.7%) spent that night in transitional housing, while another 28.6% were staying temporarily with family or friends. The top reason for becoming homeless was due to job loss, the second most common reason was housing costs, and the third was due to a relationship or family breakup. The top five needed services for the homeless were transportation/bus passes; finding a job; finding permanent housing; and receiving dental and medical care. On that night, 92.0% of the homeless were from households with children and ten people were chronically homeless. Food stamps were the primary income or resource for 29.7% of those that were homeless, while 25.8% reported no income whatsoever.

An April 19, 2006 article in the Rocky Mountain News noted that the St. Francis Center, a homeless shelter that accommodated 250 people in north Denver was closing its overnight shelter services May 1. Closure of the overnight shelter was done to meet past commitments to its Curtis Park neighbors who were concerned about the shelter being located in their neighborhood. An April 9, 2006 commentary in the Denver Post about the pending closure of the St. Francis Center noted that the City of Denver's 10-year plan to end homelessness is lacking in two areas: a lack of focus on the root causes of homelessness; and a lack of accountability and participation by the homeless population being served.

ACCESS Housing, Inc. was formed in 1983 and provides emergency and transitional housing for homeless families with children. The shelter has space for eight families at a time, for 30 – 60 days. There is typically a waiting list of 30 – 60 days for shelter space. Transitional housing is provided for six months, up to a maximum of two years in the nine units ACCESS Housing has – six of which are in Aurora. ACCESS Housing also has 18 Section 8 vouchers for permanent housing through the Welfare to Work Program. In addition to housing, intensive case management is offered to assist families with other services, such as childcare and employment. Included in case management is a 16-point assessment designed to get people thinking about where they want to be in the future. Homelessness prevention is also offered through rent and utility assistance, motel vouchers can be provided on a temporary basis and a food closet is also provided. On an annual basis, ACCESS Housing serves 1,000 – 1,100 persons, 90.0% of which are single mothers. About one-third of ACCESS Housing clients are of Hispanic origin and there are bilingual staff members available to translate. According to ACCESS Housing staff, the primary reason someone was homeless in the past was due to drug use. Now, the primary reason is loss of income. Many people lack the education and skills to find a job that will provide them with an adequate income.

Almost Home, Inc. began operation in 1994 to prevent homelessness and provide temporary, transitional, and permanent affordable housing. A 14-bed shelter offered 2,047 nights of shelter in 2005, served 2,845 people, of which 65.0% were children. Also in 2005, Almost Home provided over \$160,000 in rent and utility assistance, and kept over 200 Brighton school-aged children from being evicted from their homes in the 13 transitional housing units in Brighton and Commerce City. In 2006, the staff of Almost Home expects to provide over 3,000 nights of shelter and house another 110 homeless families in motels, as well as provide case management (including bi-lingual case management) and counseling to more than 3,000 family members. In 2003, the Hughes Station project was completed, providing 120 units of affordable, workforce housing in downtown Brighton. This project offers 1 – 3 bedroom apartments and community amenities, including playgrounds and a sports court, computer center, and a community center. Rents are based on income guidelines, and start at \$363 per month for a one-bedroom/one-bath apartment for persons or families earning up to 30.0% of area median income; up to \$501 per month for a three-bedroom/two-bath apartment for persons or families earning up to 30.0% of area median income. Seventy percent of the housing units at Hughes Station are for persons or families earning 50.0% of area median income or below. Almost Home also requires a deposit of \$200 - \$300 depending on unit size and an application fee of \$28. The recent vacancy rate at Hughes Station was between 6.0 and 7.0 percent and nearly half of the units turn over on an annual basis. This turnover has made it even more difficult to build a sense of community at Hughes Station. The staff of Almost Home sees the most common barriers facing Hughes Station or shelter residents as the lack of an adequate income, lack of housing units to serve the extremely poor population, and a lack of starter homes for those who are seeking a home ownership opportunity. Many persons or families that are seeking housing at Hughes Station do not have adequate incomes, where incomes must be 2.5 times the monthly rent. This means that someone renting a one-bedroom apartment with an income of not more than 30.0% of area median income must make at least \$907 per month. One-bedroom apartments are in the biggest demand, while three-bedroom units take longer to fill. Typically, the majority of residents (over 75.0%) at Hughes Station are of Hispanic origin.

Alternatives to Family Violence (ATFV) provides shelter to women and children who are victims of domestic violence. ATFV offers bi-lingual services in crisis intervention; community resource referrals; professional counseling; and self-directed advocacy. The shelter provides over 5,500 nights of shelter annually in 21 beds and cribs, but may turn away 300 – 350 women and children each year. The traditional length of stay in a domestic violence shelter has been 45 days; however, lengths of stay are now increasing upwards to 90 days. Women in a domestic violence shelter often suffer a stigma over being in a shelter, since they are perceived as having made mistakes. They may not have held a full-time job recently and while they may have qualified for rental assistance while remaining with their husbands, they must hold a 40-hour a week job to qualify on their own. Alternatives receives Section 8 tenant-based rental assistance. Transportation is often a barrier for women living in a shelter, since many of them do not have a car and their world vision may be the end of the block where they have been living with a spouse or boyfriend. Some may not even know how to use the bus system. Staff of ATFV note that women with

chronic mental illness and those with disabilities face the most barriers to finding housing.

Colorado Homeless Families (CHF) is a transitional housing program that has been serving the Denver metro area since 1987. CHF serves families that are the new poor (homeless for the first time) and the working poor (families that are working, but can't keep up with the cost of housing). Through a variety of reasons, these families have become homeless. CHF has 48 housing units and annually assists between 240 – 360 individuals in 47-72 families. Seven of these housing units are in Adams County and 16 are in Westminster. Rents are typically 27.0 – 30.0% of the family's income. The goal of CHF is self-sufficiency within 18 months – two years for those enrolled in the program and they must commit to completing the program. Immigrant families from Russia, Bosnia, and African nations now make up 30.0% of CHF's resident population, while single-parent families make up nearly 60.0%. In addition to housing, case management, educational seminars, parenting and financial training are offered. Parents must be attending school or be employed in a position with the opportunity to improve their financial situation during the time they are enrolled in this program. Parents are also required to contribute 60 hours of community service annually to CHF. In 2005, residents donated 5,880 hours of volunteer work doing such things as staffing the food closet, or mowing the grass at CHF's housing units. The staff at CHF believes that barriers their residents face include criminal background and language barriers, particularly for immigrants.

Growing Home (formerly the Adams County Interfaith Hospitality Network) provides shelter to families with children at 34 host churches, one synagogue, one university, and one hospital that give overnight shelter and meals on a rotating basis. The day center operated by Growing Home offers showers, laundry facilities, and a computer for resident use. Of those assisted by Growing Home, 55.0% – 60.0% are children. In 2005, 132 individuals and 33 families found shelter with Growing Home. About 80.0% graduate from this program into permanently affordable housing. Other services offered by Growing Home include rent and mortgage assistance (50 – 60 families are assisted with \$200 – \$600 per family); information referral (over 1,100 families are assisted); clothing, personal items, and food (over 300 families are assisted); children's program for after school tutoring, weekend activities, and summer program; and housing. Growing Home recently acquired a 20-unit apartment complex in Westminster. Four of these units will be used as transitional units, while the remaining 16 will be permanently affordable. Some of these housing units will be accessible and Growing Home staff expects to establish a waiting list for these units. In the next five years, Growing Home hopes to expand into more housing opportunities and partner with other organizations to do so. Barriers to resident's housing choice include criminal background, credit history, low wages, and a lack of education. Like other organizations, Growing Home is seeing an increase in the number of working poor seeking assistance.

Housing Needs for Seniors

Data from the 2000 Census showed that there were 28,382 seniors over the age of 65 years living in Adams County. Seniors over the age of 65 are expected to account for 10.0% of the total

Adams County population. The 75 - 84 and 85 and over age groups were the fastest growing groups in the 2000 Census; however, the 25 - 54 year olds were the largest segments of the population. This means that the overall senior population can be expected to continue to grow as these larger groups continue to age into their senior years. For seniors 65 years and older, 2,019 persons were living below the poverty level based on the 2000 Census in Adams County. Since most seniors live on fixed incomes, area housing costs will be difficult to be met by many seniors. Whether seniors age in place and continue living in their current housing, or search out other living arrangements, such as assisted living or other senior housing, such as retirement communities, will have a significant affect on the housing available to these seniors, as well as for those who continue to work. Housing Colorado's 2006 Facts Book estimates that over 7,000 additional housing units are needed for seniors living on social security or retirement benefits in Colorado.

The Legal Center for People with Disabilities and Seniors assists seniors with housing issues. The Center has provided protection and advocacy for persons with disabilities and seniors statewide for the past 30 years. Center staff notes that housing barriers for seniors (and persons with disabilities) are affordability, accessibility (accessibility of a specific unit, as well as geographic accessibility), and the Section 8 voucher system. The voucher system was noted due to the lengthy wait to obtain a voucher and the condition of housing that is affordable to seniors once they receive a voucher.

The Senior Hub, located in Federal Heights (with additional locations in Aurora and Thornton) offers a variety of services to the seniors of Adams County. Programs offered include Meals on Wheels; the Retired and Senior Volunteer Program (RSVP); Senior Solutions; tax counseling; adult day service; Rural Nutrition Program; Minor Home Repair Program; and the Respite and In-Home Supportive Services. The Senior Hub's 2004 annual report notes that 11,559 people were served in 2004 by this organization and 179,510 volunteer service hours were donated by volunteers. The Minor Home Repair Program provided repairs to 464 homes and 51,267 home-delivered meals were served. The Rural Nutrition Program serves those 60 years and older who live in and around Bennett and Strasburg. The Senior Solutions Program provides resources, counseling and problem-solving for seniors, as well as a food bank, medical equipment lending service, and emergency assistance. Between 1,500 and 2,000 people are assisted by this program annually. Assistance requests were particularly high prior to the recent deadlines for Medicare-related prescription programs, as many people were overwhelmed by the number of options made available to them and contacted Senior Solutions for information.

Senior centers are numerous in Adams County. In addition to the Senior Hub, senior centers are located in Aurora, Brighton, Commerce City, Northglenn, Thornton, and Westminster/Hyland Hills Park and Recreation District. All centers offer a variety of services and programs to assist seniors and provide activities and support for them. Many seniors have built friendships among the staff and other participants and volunteers at the centers.

The Retired and Senior Volunteer Program operates in Adams and Arapahoe Counties. This program recruits volunteers 55 years and older to fill volunteer positions using their skills and experience. RSVP volunteers can provide tutoring, visitation, tax counseling, and a variety of other skills can be put to use. Volunteers receive insurance and mileage reimbursements, as well as the personal satisfaction that comes from helping others and learning new skills and knowledge while doing so.

There are a variety of senior housing options available in Adams County, depending on a particular person's needs and ability to afford the various options. Most seniors would like to age-in-place, opting to remain in their own homes, or current living situation; while others may need additional assistance and/or care and as a result, may need to move to some other type of housing. Aging-in-place may require modifications to improve the level of safety and comfort needed for someone to remain in their home. While such modifications may include costly ones, there are options available for funding these improvements, including the use of reverse mortgages and agencies that offer home improvement or repair programs. In some cases, home health care on a daily or weekly basis may provide the additional assistance needed so seniors can remain in their homes.

Housing options for seniors include independent living, assisted living, retirement communities, nursing homes, and Alzheimer or memory care facilities. Independent living or retirement communities typically include those for active seniors. These locations offer fitness centers, social events, spas, and outdoor recreational areas, as well as a variety of housing unit types. Prices range from about \$400 - \$1,300 per month, depending on location, unit type and size, and services offered and meals are not typically included. Independent living also refers to someone who is living in their own home or in an apartment. Assisted living facilities typically offer meals and care from live-in caretakers. These living arrangements may start at about \$1,100 and can cost up to \$4,000 per month depending on location, and unit type and size. Assisted living homes are also available where a small number of seniors reside in private residential homes. Assisted living homes often provide a less expensive alternative to a large-scale assisting living facility in a more home-like atmosphere. Skilled nursing centers charge by the daily rate and typically start between \$125 and \$225 per day, depending on the nature and extent of treatment needed. Other options for seniors include respite care and adult day care. In some cases, there are waiting lists for housing units, particularly at the more affordable price ranges. Finding housing for seniors with disabilities is particularly difficult, although with our aging population, there are more accessible housing units being built or retrofitted to accommodate this population. Increasing utility and transportation costs are impacting seniors, as well as others on fixed incomes.

Housing Needs for Minorities

The 2000 Census showed increases in the minority population in Adams County. In particular, the population of Hispanic origin has shown a fairly significant increase in the past ten years, to 28.2% of the county's population in 2000. African Americans make up 3.0% of the population,

while Asians/Pacific Islanders account for 3.3% and 15.2% of the county population are an other race, or more than one race. Of the municipalities in Adams County, persons of Hispanic origin make up 52.9% of Commerce City's population; 38.2% of Brighton's population; and 22.6% of Federal Height's population. African Americans account for 13.4% of Aurora's population; and Asians/Pacific Islanders make up 6.3% of Federal Height's population and 5.6% of Westminster's population. Persons of other races or one or more races account for 30.0% of the population in Commerce City and 19.5% of the population in Brighton. The 2000 Census data for poverty levels show that 47.4% of Hispanic families in Adams County were living below poverty levels, 7.0% were African Americans, 3.0% were Asians, 1.2% were Native Americans, and 1.0% were native Hawaiians/Pacific Islanders.

Areas of minority concentrations occur in unincorporated Southwest Adams County, and in Aurora, Brighton, and Commerce City. This concentration does not appear to have happened as a result of past discriminatory practices, but occurred as a result of economic factors such as land costs and evolving land uses (i.e. motels converting to residential uses). The Housing Authority and other non-profit housing agencies have scattered site policies, intended to distribute the supply of affordable housing throughout the area, and to acquire additional affordable housing in areas where it is not currently available. The majority of clients served by agencies such as Almost Home and Alternatives to Family Violence are of minority or ethnic origin, with persons of Hispanic origin being the largest group.

Housing Needs for the Mentally Ill

The 2000 Census showed that 8,998 residents of Adams County had a mental disability and nationally, estimates are that nearly one person in five has a diagnosable mental illness. The mentally ill often find housing in homes dispersed throughout the community. Those that are able to live independently have other housing options available in the community; however, probably the biggest barrier is housing affordability, since most do not work and must live on Social Security payments averaging about \$600 per month. With such a limited source of funds, they have a difficult time paying for rent, utilities, food, medications, and transportation.

One difficulty for those who are mentally ill is that their disability may not be visible (as is the case with someone who has a physical disability) and as a result, they and their disability may be misunderstood. This often results in not being as readily accepted into a residential setting in a neighborhood. Information provided by the National Alliance for the Mentally Ill notes that one in every five families is affected in their lifetime by a several mental illness, such as bipolar disorder, schizophrenia, or major depression and that one in ten children and adolescents have mental illnesses that cause some level of impairment.

The Community Reach Center, formerly the Adams County Mental Health Center, operates five facilities throughout Adams County, providing supportive mental health services and substance abuse treatment to over 7,000 Adams County residents annually. Facilities are located in

Brighton, Commerce City, Northglenn, Thornton, and Westminster and the Intensive Treatment House is in Denver. The Center assists over 200 persons with housing assistance through Section 8 vouchers, Shelter Grants, or other HUD-funded programs. Most of the individuals seeking assistance through the Center are not able to work due to their illness and are living on very low incomes. They may not have families or other support systems to help them. In some cases, their illness may result in credit problems and/or criminal background issues, which makes finding housing even more difficult. With high vacancy rates and the resulting lower rents, many people are living in housing units that they may not be able to afford once the concessions of lower rent run out.

Substance abuse is becoming more prevalent with estimates that 1 in 7 people will suffer from drug and/or alcohol abuse at some point in their life. Substance abuse is often found along with mental illness in a dual diagnosis situation. Arapahoe House provides comprehensive drug, alcohol and behavioral programs, some of which are residential in nature and are located in Adams County or its municipalities. The intensive residential treatment facility in Thornton can house 20 adolescents. The Aspen Center, located in Westminster, houses 15 adolescents who have no permanent family living situation and who are being prepared for independent living. The Wright Center offers transitional housing for up to 22 homeless individuals who have completed some level of treatment. Other programs are operated by Arapahoe House throughout the metro area and are available to Adams County residents. In 2004, Arapahoe House served 15,778 individuals and opened 21,530 admissions to their facilities in the metro area.

Housing for persons living with HIV/AIDS

Between April 2005 and the end of the first quarter of 2006, the HIV/STD Surveillance Program of the Colorado Department of Public Health and Environment noted 411 cases of AIDS, 229 cases of HIV, and 236 HIV/AIDS-related deaths in Adams County. This means that there were 404 persons living with HIV/AIDS in Adams County. In Colorado during this same time period, there were 8,490 cases of AIDS, 6,024 cases, of HIV, and 4,850 deaths leaving 9,664 persons living with HIV/AIDS in Colorado. Persons living with HIV/AIDS may find a greater variety of housing options available to them since HIV/AIDS patients are living longer, healthier lives, due to the advances in treatments that are now available. As with any other special need, the access to housing increases with the level of income and resources that are available. HIV/AIDS patients receive assistance from the Colorado AIDS Project (CAP), which was started in 1983. CAP provides a variety of services to its clients, including counseling and case management, housing, nutrition, and financial assistance. Housing services have been provided since 1995 through the Hogan House Transitional Housing Program and at Dave's Place, a permanent housing program. CAP works with the Denver Housing Authority and Colorado Division of Housing to administer housing vouchers for rental assistance.

Displacement

There is a potential for displacement of current residents with the proposed Brighton Village development. This site currently has existing housing units on it that are occupied. The plans for Brighton Village are for 60 two-bedroom housing units to serve persons with incomes of 50% of area median income or lower. Relocation assistance may be necessary and in some cases, current tenants may be able to reside in the new housing units if income qualifications are met. Relocation assistance typically consists of counseling and referrals to comparable and suitable replacement homes; payment for moving expenses; and replacement housing assistance, for either rental assistance or purchase assistance.

Redevelopment of areas such as Fitzsimmons may also result in displacement, as these areas are slated for redevelopment and upgrading. As areas are being redeveloped and tenants have to relocate to other areas, they may not have the needed deposit and rent required when they are forced to move to a different location where rent may be even higher. Adams County Community Development adheres to HUD anti-displacement and relocation assistance policies. If displacement occurs, relocation assistance will be provided as per the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Optional relocation assistance may also be used from CDBG funds, but must be made available to all eligible residents that are affected by relocation.

Other housing needs

In 1978, lead-based paint was banned from use in the United States. Much of Adams County's housing stock was built before this ban went into effect. The 2000 Census noted that 81,153 (90.0%) of the County's housing stock was built prior to 1979. An estimate of 10,000 low income households in Adams County was suggested in the County's Consolidated Plan as an estimate of the number of housing units where lead paint may be an issue.

Estimates of the overcrowding of housing units in Adams County were made in the County's Consolidated Plan, based on the Adams County Housing Study and Household Survey conducted in 2002. These estimates reveal that between 3,574 and 8,520 housing units in the county are overcrowded, with more people occupying these housing units than they were originally intended for. Overcrowding is often used as a solution, although typically a temporary one, for high housing costs that individuals or families are experiencing. Overcrowding was mentioned as an issue by several residents that participated in the focus groups on fair housing, and was particularly of concern for larger families.

Higher energy costs are impacting the overall cost of housing for many families and individuals. The Adams County Low-Income Energy Assistance Program (LEAP) provides assistance in paying a portion of winter home heating costs for low-income households. Assistance is given to those households who pay directly to a utility company, or those that have heat costs included in

their rent. Applications are accepted from November 1 – April 30, annually. Other services provided through LEAP include weatherization and assistance with non-fuel related emergencies, such as pair or replacement of a furnace or windows

Summary

The general housing concerns in Adams County relate to the availability of housing assistance and the use of preferences and waiting lists to determine who receives such assistance. There is a greater need for this assistance, either through the Section 8 Program and/or public housing program that is not being met due to the large number of families and individuals seeking assistance. Waiting lists for housing assistance continue to grow each time the lists are open for new applications. Housing concerns for specific populations that need to be addressed in order for fair housing choice to be available to everyone include housing for persons with disabilities; single heads of household families; the homeless; seniors; minority families and individuals; the mentally ill; and persons with HIV/AIDS. Any of these families and individuals could experience displacement, which could result in the loss of their housing through no fault of their own. Other housing issues, such as the existence of lead-based paint in housing units, overcrowding, and high energy costs also may affect the availability and viability of housing for these families and individuals who are typically in a fragile housing state to begin with. The need, in terms of numbers of units for these special populations, is documented in the County's Consolidated Plan, 2005 – 2009, through the Gaps Analysis.

SECTION FOUR
Identification of Impediments to Fair Housing Choice

A. Public Sector – Adams County

1. Comprehensive Plan, Zoning Codes: The current Adams County Comprehensive Plan was adopted in February 2004, although the county has had a Plan since 1968. Updates were done in 1975 and 1984. The Plan includes two goals related to housing. These goals are to “encourage the development of high quality housing in a variety of price ranges” and “establish standards for determining appropriate locations for low-density, estate residential development”. The Plan also has a key goal of establishing municipal growth areas to encourage coordination among jurisdictions for greater efficiency for the extension of services; and a goal of building a culture of collaboration – a necessity for Adams County, given the large number of municipalities located within its boundaries. The estate residential development goal provides policy direction to encourage low density residential development only where “such a land use pattern is already established or where such patterns may be appropriately extended”; adopt development standards to ensure such development is sensitive to environmental and natural features; and that future residents are aware of any potential airport-related impacts (i.e. noise from Denver International Airport). There is also policy direction to discourage new urban-scale residential developments in areas designated for estate residential development. Inherent in this policy is that urban-scale developments should occur within municipal limits, or in areas where municipal services can be provided. Planning staff anticipates working on a housing element for the Comprehensive Plan sometime in the next year or so that would focus on providing a balance of housing of all types and jobs.

County Planning staff completed the Southwest Adams County Framework for Future Planning in 2005, to outline future planning and redevelopment efforts needed in this area. The area is generally bounded by 88th Avenue on the north; the South Platte River on the east; 52nd Avenue (county line) on the south; and Sheridan Avenue on the west. The area includes 15 Census Tracts and covers the neighborhoods known as North and South Perlmack; Welby; North Washington Industrial; Utah Junction; South Federal; Berkeley; SE Arvada; Baker; Goat Hill; and Shaw Heights. These areas have seen a 30% growth in population from 1990 to 2000, compared to a 38.4% increase for the entire county during this same time period. In 2000, 59,443 persons resided in the Census Tracts included within Southwest Adams County. Of these residents, 48,300 lived in unincorporated Adams County, while the remaining residents lived in Arvada, Westminster, and Thornton. The Framework Plan provides for the creation of organized citizen groups within this area and details the responsibilities taken on by citizens, as well as Adams County. The first neighborhood area that will participate in sub-area neighborhood planning is the Goat Hill area, which lies between the Colorado Southern Railroad, 64th Avenue and Lowell Boulevard. Much of the Southwest Adams County area is impacted by floodplains from Clear Creek and the South Platte River; the Mineral Conservation Overlay District (due to proximity to the rivers); and the 87 former landfill sites that dot this area. In addition, U.S.

Highway 36/270; I-25; I-76; and the Colorado Southern Railroad traverse the area. Staff from Adams County Community Development and Planning has been working with the Community Resource Center (CRC) to strengthen the county's unincorporated neighborhoods by developing ways to improve communication. With County support, CRC works to assess and train neighborhood groups, giving them networking and training opportunities that otherwise would not be available. The Goat Hill neighborhood is one of the first to work with CRC and may become a model to use for bringing together other neighborhoods throughout Adams County. The lack of a sense of community, particularly in the unincorporated neighborhoods, was evident in the County's Community Needs Assessment, where residents noted little connection to their neighbors or localized area.

The Comprehensive Plan also provides for the transfer of development rights from areas that are environmentally sensitive (Barr Lake/South Platte river; conservation areas); important farmlands; and the Noise Overlay for DIA and Airport Influence Zone for Front Range Airport. Density that would otherwise have been permitted in these areas, based on the underlying zoning, may be transferred to other areas identified in Adams County. The receiving areas are in the Bennett/Strasburg area; areas north and east of DIA and its noise overlay; and areas north and east of Front Range Airport.

The Adams County Development Standards and Regulations include six residential zoning districts and one mobile home district, although there have not been any new mobile home communities in the county for many years. There are also other districts that permit residential uses on a limited basis, such as the Agricultural Districts. Minimum lot sizes range from 5,000 square feet for a mobile home in the Mobile Home Dwelling District, up to 2.5 acres in the Residential Estate District if both public water and sewer are not available. Although the Residential Estate District requires large lots and a minimum floor area of 1,800 square feet, there are other residential zoning districts, such as the R-1-C that has a minimum lot size of 7,000 or 7,500 square feet (depending on whether the lot is a corner lot), or the R-4 District (high density) that permits a maximum density of 35 dwelling units per acre and a minimum 2 acre lot size. While the County's Comprehensive Plan encourages large lot, residential estate dwellings, there are county zoning districts that allow higher densities that are not typically found in county regulations. The framework planning and future neighborhood planning for areas within Southwest Adams County can also provide needed attention to long-neglected residential areas that have developed with heavy concentrations of mobile home communities and higher density residential uses. Adams County is in a unique situation of being a county that has or is adjacent to highly urbanized areas, while also having very rural areas in its eastern two-thirds.

Conclusion: The Comprehensive Plan and Development Standards and Regulations do not appear to be impediments to fair housing choice, although there are no incentives to encourage higher density or affordable housing.

2. NIMBY-ism: NIMBY-ism has been an issue in the past on some housing developments – particularly those that were touted as affordable. The majority of any future affordable or

attainable housing is expected to occur in the more urban areas of the county and in particular, in its municipalities. As Adams County Community Development and the Planning office continue to work with area neighborhoods, they may be able to work with more residents and inform them of the value of, and need for affordable housing. NIMBY-ism is often created as a result of a fear of the unknown. Residents typically do not understand what affordable housing is, nor do they have any idea who might live in affordable housing. There is often a perception that the residents of affordable housing bring a criminal element to an area and that property values will drop as such developments occur in an area. There is a significant need to inform residents about affordable housing so that they understand it, rather than fear it. One potential solution may be to use the term attainable rather than affordable.

The County Planning office requires neighborhood meetings on most development applications early in the review process. These meetings give area residents early notice of a planned development and are an opportunity for residents to give input on the proposal at a time when changes can still be made to improve the plan. The neighborhood meeting process is particularly critical for developments that the Planning staff expects to be controversial. **Conclusion: NIMBY-ism, when it occurs, can be an impediment to fair housing choice.**

3. Development Process and Costs: A common complaint voiced by developers about planning processes is the time it takes to receive a decision through the development review process. The county's review process is a fairly traditional one, beginning with a concept review, neighborhood meeting, and then a formal submittal to the County staff. Recommendations are typically made by staff to the Planning Commission, with final decisions made by the Board of County Commissioners. The amount of time a development takes to get through a development review process is highly contingent on the nature of the development and its complexity, the issues that are related to the development, and the staff and developer's willingness to work together to seek solutions. Also, the number of development applications that are under review at any given time can affect the processing time, particularly if there is a high number of applications to review. **Conclusion: The County's development review process does not appear to be an impediment to fair housing choice; however, it does not offer any consideration or incentives to encourage or facilitate affordable housing projects.**

Application costs for development submittals to Adams County range from a base fee of \$100 for a final plat, to \$700 (plus fees based on size of development) for a preliminary plat. These are fairly typical fees and may, in fact, be lower than other development application fees in the metro Denver area. Adams County has a Traffic Impact Fee that is applied to residential land uses, ranging from \$888.37 per mobile home space, to \$1,599.07 for a single-family detached home. These fees are collected at the time of building permit. A traffic impact fee is getting to be a fairly standard type of fee to help offset the impacts of additional traffic that development brings to an area. The County does not have any programs or incentives for affordable housing

developments that would allow waiving or reducing impact fees.

Developed lot prices, for lots that are ready to be built upon, average from \$55,000 - \$70,000 in the metro area. The cost of the lot is typically about one-fourth of the cost of the home to be constructed on the lot. Costs that go into the cost of housing include labor and materials; infrastructure; government fees; sales/interest/insurance; land; and profit. The largest of these expenses are labor and materials, and land costs. The Colorado Division of Housing's 2002 report titled "Housing Colorado: The challenge for a growing state" showed that the average urban area development and impact fees were \$14,712 per lot. This report included a survey of 22 urban counties and municipalities and 14 rural counties and municipalities. The 2002 fees reflected an average 7.4% annual increase between 1998 and 2002 for urban areas and a 3.0% increase in rural areas. Since 2002, additional fees have been added in some jurisdictions, including transportation and school impact fees, public service and facilities fees, police and fire fees, parks and recreation fees, and most water and sewer providers have increased their fees. In many of the metro area communities, development fees average \$20,000 - \$30,000 for a single-family lot. Some communities in Colorado have established fee waiver, reduction, and/or reimbursement programs for affordable housing developments to help offset these high fees. While these fees have a legitimate role to play in helping new development pay its own way and offset the development-related impacts, these fees do impact the cost of housing since they are typically passed on to the eventual home owner or tenant. One developer interviewed for this report noted that homes east of I-25 typically are \$10,000 - \$20,000 lower in cost than homes west of I-25. This developer also listed the costs of water, land, and entitlement (i.e. review process and development/impact fees) as being the major homebuilding costs today and that these costs make it difficult to build affordable housing. **Conclusion: Land development costs and impact fees are impediments to fair housing choice since they add to the cost of housing.**

4. Building Codes: The Adams County Building Department uses the 1997 Uniform Building Code (UBC); however, the department is currently reviewing the 2006 International Codes for consideration for adoption later in the year. The 2003 International Residential Code (IRC), being used by many metro communities, is very similar to the 1997 Uniform Building Code (UBC) and the 2000 IRC, which closely mirror the Fair Housing Act (FHA). The Fair Housing Act standards require buildings that are first occupied after March 13, 1991 and which have an elevator and four or more units, to have accessible public and common areas; doors and hallways wide enough to accommodate wheelchairs; units must have accessible routes into and through the unit; light switches, electrical outlets, thermostats and other controls must be accessible; reinforced bathroom walls to allow for future grab bar installation; and kitchens and bathrooms that can be used by persons in wheelchairs. Buildings that have four units or more, without an elevator, must provide these accessible features in all ground floor units. In some cases, Colorado law may be more restrictive in terms of the numbers and ratios of accessible units required. The International Code Council recently requested that HUD review the 2003 IBC to determine its level of consistency with the accessibility requirements of the Fair Housing

Act, the regulations implementing the FHA, and FHA accessibility guidelines. This review

identified eight areas that were not considered to be consistent by HUD. After public comments were taken, HUD revised its position on all but one of these areas, regarding accessible routes from site arrival points to accessible building entrances. HUD's position on this topic is to make all users of the 2003 IBC aware of this and proposes that this area be revised during the 2006/2007 Code Development Cycle. **Conclusion: The County's adoption of the latest version of the International Codes would be supportive of fair housing choice.**

5. Definition of family: The County's definition of family is three or more related individuals, or any number of unrelated persons if "living and cooking together as a single housekeeping unit, but shall not include unrelated students attending colleges or universities". This definition is fairly flexible when it comes to unrelated individuals, as long as they are not college students, and would allow unrelated individuals to live together to share the costs of housing and utilities. **Conclusion: The County's current definition of family does not appear to be an impediment to fair housing choice.**

6. Group Homes: Group homes are categorized in the County's Development Standards and Regulations as group living facilities and may be occupied by seniors, developmentally disabled persons, residents of domestic violence shelters, persons receiving residential treatment, residential child care, and communal homes. Group living facilities with one - five residents are permitted land uses in all residential zoning districts. Such facilities with more than five residents, or with one or more registered sex offender are considered conditional uses, which require a recommendation by the Planning Commission and approval by the Board of County Commissioners. These requirements are fairly typical and do not appear to be an impediment, since five persons may reside in a group living facility with no public review. **Conclusion: The County's Zoning Code standards relating to group homes and group living quarters do not appear to be an impediment to fair housing choice.**

7. Neighborhood Revitalization; Municipal and Other Services; Employment, Housing, and Transportation Linkage: A significant amount of neighborhood revitalization has occurred in recent years in the established low-and moderate-income neighborhoods throughout Adams County. Revitalization improvements have occurred in the Goat Hill Neighborhood (Neighborhood Caretakers program), where homes are being repaired; homes in Thornton were rehabilitated through the City's Help for Homes program; Northglenn's Neighborhood Development Corporation improves the appearance of homes and neighborhoods; the City of Aurora has several home repair/improvement programs, including programs for single-family owner-occupied homes, multi-family rental units, and homes for persons with disabilities; and Brothers Redevelopment, Inc. assists with its annual Paint-a-Thon program. In the County's 2006 Action Plan, 285 housing units are planned for rehabilitation, repair, and/or weatherization and since 2000, over 600 housing units have been rehabilitated, repaired, and

weatherized. Between 2005 – and 2009, over 1,600 housing units are planned to have these improvements made. The Adams County 2006 Action Plan includes funding for curb and gutter improvements in Brighton; improvements to 90th Avenue in Federal Heights; fencing along Washington Street in Northglenn; and accessibility improvements in Thornton.

The Workforce Center is located in Adams County's Western Service Center at 122nd and Pecos Street. This center is located in an area that is easily accessible by the public transit system. Other Workforce Centers are located at the Community College of Aurora (located in Aurora) and the Front Range Community College Institute for Community & Professional Development. Adams County has future plans for centralizing many of its services to a new campus to be located at 124th Avenue and Sable, while the Justice Center and Courthouse will remain in Brighton. For some County residents, this new location may make it more difficult to access these services, while for others, this location will be more convenient. With such a large county to serve, it is difficult to find a location that is accessible for all residents. The transportation improvements listed below will provide additional transportation options for residents.

The RTD bus routes traverse most areas of Adams County. The FasTracks project will include transit improvements in Adams County, primarily along the I-25, US 36, and I-225 corridors. Bus service will be expanded. FasTracks has a 12-year schedule for the completion of its planned facilities and Adams County facilities such as the East Corridor Rail and North Metro Corridor Rail are planned for 2014 and 2015. These corridors will connect Thornton, Northglenn, and Commerce City to the metro area; and provide commuter rail from Union Station downtown, to DIA. New rail stations are also included along these lines and will offer the potential for transit-oriented development to occur, including higher density residential units near the transit stations. During interviews for this study, as well as focus group discussions, transportation was identified as a barrier by a number of people. There is a need for more housing developments to occur in close proximity to alternative modes of transportation and to places of employment. Historically, we have separated our housing areas from employment areas and as a result, many more miles are traveled between home and work. There is an opportunity with TOD's to improve this situation, but, currently there does appear to be a barrier created by a lack of an employment/housing/transportation linkage, since the existing transportation is not well-linked. **Conclusion: There does not appear to be any impediment to fair housing choice related to neighborhood revitalization, municipal and other services; however, the lack of a better employment/housing/transportation linkage is an impediment to fair housing choice.**

8. Public Housing and other assisted/insured housing provider tenant selection procedures; housing choices for voucher holders: The Adams County Housing Authority has 1,330 Section 8 vouchers, and 77 units of public housing for low income seniors and persons with disabilities. The Authority owns 1,067 units of affordable housing and partners on another 616 affordable housing units, for a total of 1,683 units. The Brighton Housing Authority has 212 Section 8 vouchers, 44 units of public housing, and 15 scattered sites of public housing. The Commerce City Housing Authority has 80 Section 8 vouchers and 187 apartment units. The Aurora Housing

Authority has 1,083 vouchers and 333 certificates in rental assistance. Public housing includes 121 units of senior housing and 80 scattered sites for families. The Westminster Housing Authority owns and operates a 130-unit complex for seniors and persons with disabilities. All housing authorities have waiting lists for rental assistance and the wait for housing assistance can be from several months to several years, depending on the number of families on the list, type of unit requested, and availability of housing units. **Conclusion: There does not appear to be any impediment to fair housing choice in tenant selection procedures or in housing choices for voucher holders.**

9. Sale of subsidized housing and possible displacement: There is a potential for displacement of current residents with the proposed Brighton Village development. There are existing residents living in units on the site and 60 new housing units are planned. Also, with the amount of redevelopment in process in the county, there may be other instances of displacement occurring in the near future. Adams County Community Development adheres to HUD anti-displacement and relocation assistance policies. If displacement occurs, relocation assistance will be provided as per the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Optional relocation assistance may also be used from CDBG funds, but must be made available to all eligible residents that are affected by relocation. There are 36 housing units that are under a housing assistance contract that will expire in September of this year, as well as another 70 units in the Commerce City area that will expire between 2009 and 2011. If any of these housing units become market rate units, there may be a potential for displacement. **Conclusion: Loss of any housing units and displacement of those residing in lost units is an impediment to fair housing choice.**

10. Property tax policies: There is a property tax exemption program available for seniors in Colorado that was reinstated in 2006 for taxes payable in 2007. This tax exemption program allows for 50% of the first \$200,000 of actual value of the property to be exempt from taxation. The amount that is exempted must be repaid when the property is either sold or if changes in the owner's qualifications result in their disqualification. Participation requires that the owner be 65 years or older by January 1st of the year in which the application is filed and they must own and live in the property for at least ten consecutive years prior to the year in which the application was filed. **Conclusion: The property tax exemption program is supportive of fair housing choice, as it provides property tax relief to seniors.**

11. County Boards and Commissions: The Board of County Commissioners is responsible for the decision-making for Adams County. Due to the small size of the Board of County Commissioners, it is difficult to gain broad diversity of its membership and the representation of such a group is mandated on geographical representation. The County's Planning Commission is an appointed group of seven members, with two alternates. The Commission is responsible for making recommendations to the County Commissioners on most planning and development applications, with the Commissioners being the final decision-making body. The Community Development Advisory Board is also a seven-member group that provides advice to Community

Development on housing and related issues. This board has a fairly diverse membership. Diversity of membership on any board or commission that is involved on housing-related issues is valuable. **Conclusion: There does not appear to be any impediment to fair housing choice in the membership of County boards and commissions.**

12. Public policies and actions affecting the approval of sites and other building requirements used in the approval process for construction of public-assisted housing:

Adams County does not have any policies, actions, or programs in place to reduce or waive any fees for new public-assisted housing development, nor to provide any other incentives for such housing development. **Conclusion: There are no policies and actions to support the construction of new public-assisted housing, which is an impediment to fair housing choice.**

13. Administrative policies concerning community development and housing activities, such as Urban Homesteading, Multi-Family Rehabilitation, and Activities Causing Displacement, which affect opportunities of minority households to select housing inside or outside of areas of minority concentration: Adams County Community Development adheres to the directives issued by the Department of Housing and Urban Development for the administration of the Community Development Block Grant Program (CDBG), Community Services Block Grant Program (CSBG) and the HOME Program. The Adams County Housing Authority has scattered site public housing, intended to disperse publicly-assisted housing throughout the community. The Section 8 vouchers, or Housing Choice programs, provide housing choices for its households to find housing in a variety of areas throughout the county and area landlords appear willing to accept vouchers. **Conclusion: Adams County Community Development's administration of the CDBG and CSBG and HOME Programs and Housing Authority programs and policies are supportive of fair housing choice.**

14. Where there is a determination of unlawful segregation or other housing discrimination by a court, or a finding of noncompliance by HUD regarding assisted housing within a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to help remedy the discriminatory condition, including actions involving the expenditure of funds made available: There are no known determinations of unlawful segregation or other housing discrimination by the courts, or any finding of noncompliance by HUD regarding assisted housing. **Conclusion: There is no determination of unlawful segregation or other housing discrimination, or a finding of noncompliance.**

B. Public Sector – Municipalities in Adams County

The municipalities within Adams County, although not the focus of this study, do have the potential to impact housing and fair housing choice in Adams County. The information contained in this section summarizes the potential impacts, as well as potential benefits of plans, policies, codes, regulations, and programs that relate to, or have the potential to impact, housing.

Arvada: The majority of Arvada lies within Jefferson County, with less than one square mile being in Adams County. This portion of Arvada is approaching a build out state as are other metro area communities. The area within Adams County is essentially developed, although future redevelopment could occur. The City had a Housing Needs Assessment completed in 2004 which showed that 43.0% of renters and 25.0% of home owners believed that affordable housing was one of the most critical needs facing Arvada. Opportunities identified in the Needs Assessment for affordable housing included designating and focusing resources on redevelopment areas; locating housing in/near new employment areas; continuing housing rehabilitation programs; and sponsoring education programs on housing-related topics. The City's 2004 Comprehensive Plan update considered how to provide a better balance of residential land uses and identified more areas for town home and mixed-use development to occur and create a more diverse range of housing. The jobs-to-housing balance was a focal point of this planning effort.

The City's Zoning Code includes a variety of residential zoning districts, including rural and low density districts, a neo-traditional district allowing 4,500 square minimum lot sizes, medium, and high density districts. Mixed-uses, including residential uses are included and permitted in some commercial areas. Group living quarters or group homes, depending on the nature of the group home's residents (i.e. developmentally disabled, elderly, juvenile offenders) are either permitted uses, or conditional uses. Arvada's Code refers to the Fair Housing Act in allowing reasonable accommodations to be granted by the City in the instance of group living quarters. The City's definition of family allows up to five unrelated residents to share housing. Arvada also has a growth management system in place, which limits the maximum number of residential building permits each year. For 2006, a maximum of 668 new housing units can receive building permits. The City Council will review this number prior to December 31 and will decide whether to continue this program or not. Exemptions to the annual limit can be received for "housing for older persons pursuant to the Federal Fair Housing Act; for low/moderate income housing as defined by the current program income limits established by HUD; or for residential dwelling units incorporating the minimum requirements for universal housing", which provides for accessible housing.

Arvada has a fairly typical development review process, where City Council is the final authority on most land-use items. Planning application fees are fairly low. Park development and school land dedication fees-in-lieu are fairly high, with park development fees for single-family homes are at \$1,225.57 per home in 2006. School fees-in-lieu are calculated based on per acre land value and the amount of acreage that would have been dedicated. While these fees provide for park and school development, they do add to the cost of housing. The City is using the 2003 International Building Code for construction.

The City has a Housing and Neighborhood Revitalization Division that includes administration of the Arvada Housing Authority and related revitalization programs. While Arvada has a very small area included within Adams County, it does have a fairly progressive approach to housing and in particular, affordable housing.

Aurora: The northern portion of Aurora, located north of I-70 and east of Yosemite Street is within Adams County, while the vast majority of Aurora is within Arapahoe County. Aurora's Comprehensive Plan was updated in 2003 and includes a fairly detailed set of strategies on existing and new neighborhoods and housing. These strategies include the continued provision of housing for lower income residents and residents with special needs; encourage home ownership; and reinvestment and rehabilitation in existing housing stock in older neighborhoods. Aurora has long been known in Colorado for its emphasis on neighborhood planning. Several areas in Adams County were identified in the Comprehensive Plan for future growth and development, including the residential areas along the E-470 and I-70 Corridors. Developments that are in process and/or in various approval stages cover over 5,600 acres in this area and are planned for over 16,000 new housing units. These developments include High Point at DIA, Single Tree, Windler Homestead, and Green Valley Ranch. The City's Zoning Districts include a large number of residential zones, ranging from rural, one-acre lot minimums, to 30 dwelling units per acre in the City Center District. Clustered small lot development is also permitted in all zones on minimum ten-acre sites, with lots as small as 3,700 – 4,000 square feet. There are also specific zoning districts for the E-470 Corridor and the Northeast Plains area addressing residential development in these areas. The definition of family is no more than four unrelated persons living as a single unit and group homes are defined for specific residents, including the elderly, developmentally disabled, and the mentally ill and house from two - eight residents.

A Residential Masonry Standards ordinance went into effect January 29, 2005. These standards specify the amount of masonry required on all residential units and give a menu of architectural features that can be used in lieu of the masonry requirement. Several developers commented on these standards and how they impact the cost of housing. The City has a Development Assistance Office to facilitate development applications through the review process and was identified as a community that lives up to its published time lines by developers. Development fees are fairly extensive, including traffic impact, storm drainage, and a fee-in-lieu of land dedication. The City uses the 2003 IBC for construction purposes.

Bennett: The Town of Bennett's Comprehensive Plan was done in 1999 and an update is expected in 2006-2007. This update will include a housing element, and in particular, consider affordable or attainable housing for the community. New growth is expected, with a new King Soopers grocery planned for construction later this year. Increased residential development is expected to occur as a result of this new grocery and related retail development, with nearly 3,000 future housing units expected on newly-annexed areas. The Town has had three building permits for new homes in the Antelope Hills golf course development to date this year, but only had two residential building permits for the entire year of 2005. Nearly 500 housing units are expected in the Village Homes development near the proposed King Soopers, with about 350

single-family detached homes and 150 multi-family units. Development is expected to be phased over 8 – 10 years. The Town’s Zoning Code does not regulate the number of unrelated persons that can reside in a dwelling unit. Group homes are permitted as conditional uses, with approval required by the Town Board. The Town has adopted the 2000 IBC for construction purposes.

One of the issues facing developers in Bennett is the cost of the extension of utilities and development fees. The Town has adopted a full complement of impact fees, including parks/recreation, police, public facilities, storm drainage, and transportation. A single-family detached dwelling has development fees (including water and sewer tap and plant investment fees) of about \$20,500. Additional front-end development costs are necessary for utility extensions. As a result, limited development has occurred to date; however, the construction of the new grocery may change this. The Town participated in the 1998 High Five Plains Community Needs Assessment, which suggested that the area should plan for growth and that the growth that occurs should be done in a way that keeps these communities (Bennett, Byers, Deer Trail, Strasburg, and Watkins) affordable, and maintains a sense of community spirit and cooperation among the communities.

Brighton: The City of Brighton’s Comprehensive Plan has a principle of promoting neighborhoods that have “distinctiveness and character” and a related policy of “encouraging projects that enhance the diversity of housing types and costs”. It also has the most supportive ordinances in effect for affordable housing. Lots size minimums start at 5,000 square feet for single-family detached homes, to a maximum of 20,000 square feet. Fees average \$28,000 – \$32,000 per single-family home. The City adopted a residential growth pacing system in 2000 that limits the number of building permits for new housing units to an annual allocation determined by the City Council. The maximum number of housing units for 2006 is 750, which includes both single-family and multi-family units.

Affordable housing has been defined by the City of Brighton as a dwelling unit for occupancy by a homeowner whose income is 80.0% or less of the current median income for a four-person family in the Brighton-Adams County area and for rental housing, incomes must be 60.0% or less of the current median income by family size. The ordinance that enacted these definitions in 2002 also provided for fee reductions, subsidies, or reimbursement for the construction of affordable housing units. Fees that can be considered include water and sewer fees, traffic and drainage impact fees, park development fees, bridge and/or crossing fees, and open space cash-in-lieu fees. This ordinance has been used several times to grant fee relief, including for Almost Home’s Hughes Station development for affordable rental housing; Habitat for Humanity of Metro Denver’s project; and for Brighton Village’s Senior Housing development. Based on these experiences, the City has developed an Attainable Housing Matrix to use (formerly referred to as affordable housing) to identify the types of fee reductions, subsidies, and/or reimbursements that may be available.

The City also has residential design standards that apply to site layout, as well as specific building design and offer density incentives in exchange for providing affordable, senior, and/or accessible housing. In 2004, new housing units totaled 514 and in 2005, new units hit 630. As of February 2006, Brighton had 3,594 approved lots that were not yet developed and over 4,000 additional lots that were in process totaling over 10,000 new housing units. The City also has accessible housing standards for attached residential units, intended to make these housing units visitable by persons with disabilities. The 2003 International Codes are used by the City.

Commerce City: The City's Zoning Code has several residential zoning districts with minimum lot sizes ranging from 7,000 square feet up to a one-acre minimum in rural areas. The Residential Unit District requires no minimum lot size. There are minimum size requirements for single-family and two-family homes, as well as standards requiring garages, pitched roofs, and the number of windows. Group homes for foster family care and care homes for the care of no more than two seniors are permitted in all residential zoning districts. The City's residential occupancy standards limit the number of adult persons (18 years of age or older) permitted to occupy any dwelling or dwelling unit by requiring at least 200 square feet of floor space for each adult occupant. Regardless of the size of the dwelling unit, there is still a maximum number of four adults permitted to occupy a dwelling or dwelling unit. Planning fees are on the lower side and development fees include public park fees (based on location and size of development) and fees in lieu-of-land dedication for schools. Also, the City requires private park land dedication for residents of the development in the amount of 3.0% of the usable (developable) land area. There are no incentives for affordable housing developments. Commerce City uses the 2003 IBC.

Federal Heights: Federal Heights does not have additional areas in which to expand, so development efforts are focused on redevelopment of older commercial areas through the City's Redevelopment Authority. The City's Zoning Code has five residential districts which range in minimum lot size from 4,600 square feet in the R-5 single-family/manufactured home district, to 13,500 square feet for a four-unit multi-family structure in the R-3 multi-family district. A very large percentage of the housing stock in Federal Heights is mobile homes in existing mobile home communities. Most of these communities were developed in the 1970's. One new residential development, Roth Park Flats, whose early phases have been completed, consists of 36 town home units and another 40 units are under construction. The developer of Roth Park Flats is also starting another town home development, with 84 units on 84th Avenue, west of Pecos and a single-family development, Hyland Park Heights, appears to have new life, as the remaining 38 single-family lots are expected to be built on. The City's Zoning Code permits group homes in all residential districts and limits the number of unrelated persons in a housing unit to two. The City has adopted the 2003 IBC.

Northglenn: The City of Northglenn is completely surrounded by Thornton, Westminster, and Federal Heights and has little remaining land area to develop. As a result, emphasis is placed on the redevelopment or rehabilitation of the city's existing housing stock. The City is updating its Comprehensive Plan and is adding a housing element to this plan. The current Comprehensive

Plan included goals of providing a variety of housing choices for all residents; creating secure neighborhoods; and projecting an image to attract future residents to the community. The City has also done district planning for several key areas and has addressed housing in those districts. The Town Center Planning District, generally located between Kennedy Avenue, I-25, Brigitte Drive, and Huron Street states that “all public and private actions in the Town Center Planning District consider impacts on adjacent residential areas (areas of sensitivity); maintain and enhance adjacent residential areas through code compliance and citizen involvement; encourage density and height increases; and encourage high quality multi-family housing”. The Eastern Planning District (area west of I-25, between 150th Avenue and 104th Avenue) adopted in 2003, focused on improving existing single-family homes and maintaining/improving the quality of multi-family areas. The Western Planning District, adopted in 2005, included the area generally located between 114th Avenue, and Thornton Parkway, west of I-25. This area is planned for an urban village, with mixed uses, including higher density residential.

The City’s Zoning Code has a variety of residential zoning districts with lot sizes ranging from 7,000 square feet up to 12,500 square feet and a mixed-use district that also permits multi-family residential. The definition of family permits up to four unrelated persons in a dwelling unit. Group homes are permitted uses in all residential districts, while group quarters require a special use permit. The City is currently working on transit oriented development design for a future FasTracks station and design standards for development at 120th Avenue and Grant Street. The majority of the community’s housing is fairly modest single-family detached housing. The City of Northglenn uses the 2003 IBC.

Thornton: The City of Thornton is in the process of updating its 1997 Comprehensive Plan. This plan included a housing section and identified key housing challenges. A Housing Master Plan was done in 2000, taking the housing issues identified in the 1997 Comprehensive Plan and developing recommendations to address these issues. Key issues included a need for greater diversity of housing types; protection and enhancement of property values; the need to improve development density efficiencies, through the use of techniques such as clustering; and rehabilitation and/or redevelopment of the existing older housing stock. The City recently conducted a citizen survey and of the 405 residents that participated in the survey, housing was listed as the top reason why residents had moved to Thornton. The City has a growth pacing system that was adopted in late 1999. This system was developed in response to rapid residential growth. The City Council sets annual building permit caps, based on background and analysis provided by City staff. For 2006, the caps are 1,500 single-family detached homes; 468 single-family attached homes; 1,000 multi-family homes; and 0 manufactured homes. The only year that annual caps have been reached since this program began was in 2001.

There are six mobile home communities in Thornton, comprising a total of 3,101 units, or about 10% of the community’s housing stock. The City’s Zoning Code includes a typical mix of residential districts, with 6,000 square foot lot minimums in the Single-Family Detached District, to one acre minimums in the Estate Residential District. Group homes are permitted uses in all residential districts and the definition of family allows up to 4 unrelated persons to live in a

dwelling unit. The Building Department uses the 2000 IBC. Between 2000 and 2005, there were 7,978 new single-family homes and 2,121 multi-family housing units built. The City has building design standards for new multi-family buildings to address building massing, architectural elements, setbacks, roofing, recreational amenities, and quality enhancements.

There are also design standards for new single-family detached homes, including façade design, windows and doors, roof design, garages, and quality enhancements such as garages set on alleys. Development fees in Thornton for a single-family home are just under \$18,000 and a multi-family unit is just over \$12,000. These fees are primarily driven by water and sewer costs, but are lower than development fees found in other Adams County communities. The City of Thornton has a Human Rights Ordinance that prohibits discrimination in City programs and activities on the basis of disability, race, color, national origin, ancestry, sex, age or religion.

Westminster: The City's Comprehensive Plan was completed in 2004 and incorporated housing information from the 2003 Housing Needs Study. Key goals and policies in the 2004 Plan include an emphasis on traditional mixed-use neighborhoods of varying housing densities; revitalization of existing residential neighborhoods; maintaining existing affordable housing stock, while encouraging high end and move-up housing; the creation of transit-oriented developments (TOD's) at transit locations; and concentrating higher density development near TOD's. The Comprehensive Plan re-categorized residential zoning into maximum density permitted, rather than on a specific type of housing (i.e. single-family or multi-family) to allow a mix of housing unit types in zoning districts. The Plan also provided estimates of the type of housing units to be built in the future on remaining residential lands, with 36.0% in single-family detached and 64.0% in single-family attached and multi-family housing units, for a total of approximately 3,900 additional housing units. Build-out of this plan would result in about 47,300 housing units with 123,900 residents – the majority of which (56.0%) would reside in single-family detached homes. Westminster has seven residential zoning districts and one transitional or mixed-use district that also allows residential. Minimum lot sizes range from a high of 9,000 square feet to 7,000 square feet. Densities are from 14.5 DU/acre in the R-3 District up to a maximum of 22 DU/acre in the R-4 District. A variety of group homes are permitted with special use permits approved by the Special Permit and License Board, while domestic violence shelters, another type of group home, can be approved by the City Manager. The City's Zoning Code provides definitions for a large number of group homes or similar facilities, such as residential care facility, specialized group home, personal care home, etc. There is no limit on the number of unrelated persons that can reside in a housing unit.

The City also has a Growth Management Program to cover the period between December 11, 2000 – December 31, 2010. This program is based on the City's ability to provide municipal services and establishes an allocation system for building permits for residential development, including a category for senior housing developments. There are incentives in the senior housing program for various design features the City wants to encourage, including non-glare surfaces for sidewalks; use of decorative lighting; provision of passive recreation areas; and the use of one-

story structures. In the April/May 2006 edition of Westminster City Edition, over 500 new housing units were listed as being under construction in Westminster. Development fees in Westminster are on the low side, with development fees for a single-family detached home at \$20,291 for 2006, while multi-family units range from \$9,282 - \$13,997 per unit. Fees for senior housing units are even lower. The City uses the 2000 IBC for its Building Code.

Summary: The municipalities in Adams County have a variety of plans, policies, and programs in place regarding housing; however, the City of Brighton has the only program in place that offers incentives for affordable or attainable housing. This program can waive and/or reduce many of the fees that would be required of developers – both non-profit and for-profit – that are willing to build attainable housing, as defined by the City of Brighton. To date, three developments have taken advantage of this program. The City of Westminster gives senior housing developments incentives under the City's Growth Management Program and has a series of design items to use to encourage the type of development most conducive for senior living.

Four communities have some type of growth management or growth pacing system in place. These are Arvada, Brighton, Thornton, and Westminster. These programs may have an effect on the provision of housing in general, and specifically, on housing affordability. Thornton's growth pacing system was identified by developers as impacting housing cost since this system requires identification of the specific homes (floor plans, models) to be built on specific lots on a quarter-by-quarter basis each year. Changes that may need to be made later (i.e. homeowner selects a different model for a lot) result in further delays and additional work and cost prior to obtaining a building permit. Development fees and costs were also cited by developers as adding to the cost of housing, although fees in most of these communities are relatively low, with the exception of Brighton. The same water and sewer tap and plant investment fees are paid in a community, regardless of the proposed home cost. This means that these fees account for a higher percentage of the total cost when building affordable or attainable housing. A delay in the payment of fees and costs may be able to provide enough flexibility in an affordable development to make it pencil out.

Some of the design standards, such as Aurora's residential masonry standards and Thornton's residential standards, may also add to the cost of housing and while intended to provide more attractive housing units, the cost may be prohibitive for affordable developments. Both the growth management or pacing systems and residential design standards were mentioned by developers as being barriers to providing affordable housing. Design standards that were specifically identified were the residential masonry requirements in Aurora and Commerce City's requirement for two-car garages. The developer's perception is that these standards are in place so that more attractive housing will be built and the communities will not be perceived as starter home areas. There is a balance between improved quality and impact on cost that may be able to be achieved and there are some design features that may be able to be reduced, while still resulting in a high quality of housing. Examples of these features include initially using smaller plant material sizes (a smaller tree will eventually grow to the same size as a larger tree, but will take longer); reducing street widths; and

evaluating the need for sidewalks on both sides of streets in all areas. There are many other examples of design-related items that could provide needed incentives and/or cost savings for affordable or attainable housing developments.

There is a high concentration of mobile homes and mobile home communities in Adams County and its municipalities. These communities have little regulation at the state or local level, which has resulted in less than desirable living conditions for many residents. Yet mobile homes have often provided a more affordable housing option for many residents. **Conclusion: The Comprehensive Plans and Zoning Codes of the municipalities are generally supportive of fair housing choice; however, there are growth management/pacing systems and residential design standards that may be impediments to fair housing choice due to the potential for these requirements to increase housing costs. The lack of state and local standards and regulations for mobile homes and mobile home communities is an impediment to fair housing choice.**

C. Private Sector

1. Sale or rental of housing:

Supply and Demand - With a rental vacancy rate of 8.1% at the end of 2005, there are more rental units available on the market; however, average rents have increased significantly in the past several years. Since 2000, there have been over 45,000 new housing units constructed (or which are under construction) in the Denver metro area, with over 27,000 of these housing units constructed in Adams County and its municipalities. As the higher end of the market rate units are filled by those households that can afford higher rents, some of the older units, may eventually become more affordable. The Continuum of Care Housing Gap Analysis included in the County's Consolidated Plan (2005 – 2009) identified as a high priority the provision of rental housing for small families, seniors, and the all other category of individuals who were at the 0 - 30% of median family income level. Housing units that are accessible for persons that have disabilities are in need in the rental market. The analysis also identified home ownership opportunities as a high priority need. **Conclusion: A limited supply of affordable housing units for low and very low-income households and accessible units for persons with disabilities is an impediment to fair housing choice.**

Size of Family - Most of the newly constructed rental housing units have been two-bedroom units, with some three-bedroom units. Larger units that are needed to serve families with several children are still in fairly short supply and may result in overcrowding in smaller units. These larger units are typically found in single-family detached homes, which may be too costly to rent for low and moderate-income families. One apartment complex in Arvada recently advertised four-bedroom units; however, rent for this unit was \$849 which is comparable to the rent for some older, single-family homes. According to persons interviewed for this report, there is a critical need for three-bedroom units and larger. The Gap Analysis for Adams County identified a need for 907 housing units for large related families, the majority of which (529) were for those families at the 0 – 30% AMI. Residents that participated in the focus groups for this study noted

that units being too small for their family size was one of the biggest difficulties they faced in finding housing. **Conclusion: The limited supply of larger housing units for large families is an impediment to fair housing choice.**

Homelessness - There is still a need for transitional housing and on-going support services for those that are homeless. The Gap Analysis identified a current inventory of 38 beds of emergency or transitional housing spaces for individuals and 240 beds for families with children. Gaps of 310 beds for homeless individuals and 210 beds for families with children were identified. The County's 2006 Action Plan provides goals of providing housing annually for approximately 400 families that would otherwise be homeless, and a five year target of serving nearly 2,000 families by 2009. An additional 700 individuals and families receive supportive services. **Conclusion: The lack of an adequate supply of emergency and transitional housing for the homeless is an impediment to fair housing choice.**

2. Provision of Housing Brokerage Services: The North Metro Denver REALTORS Association works with area agencies and organizations to ensure that housing brokerage services are provided fairly to everyone. There are approximately 1,600 members in this association and 27,000 members statewide. The association has a code of ethics to help REALTORS avoid discrimination when marketing and selling property. Training on fair housing policies and procedures is a mandatory requirement for re-issuance of real estate licenses and is also provided with new member orientation. Affordable housing education is also offered to members. Association members are representative of the diversity found in the community, including minority members and members of Hispanic origin. Association members may also be members of the Colorado Association of REALTORS Housing Opportunity Foundation (CARHOF). CARHOF, started in 1990, raises funds for the provision of affordable housing in Colorado through special events and from the interest on escrow accounts used by REALTOR members. This interest generates between \$300,000 and \$500,000 annually to use to support homeless shelters, down payment assistance programs, and other housing-related services. During the first grant cycle of 2006, CARHOF gave \$150,000 for grant requests for non-profit affordable housing entities. **Conclusion: Current real estate practices and policies do not appear to be impediments to fair housing choice.**

3. Lending policies and practices: A number of local financial institutions and mortgage companies were contacted regarding lending programs and practices. Fair housing and lending training is provided to staff involved in lending, to ensure that there is no discrimination created by lending policies and practices. Lenders participate in community activities as directed by the Community Reinvestment Act (CRA). The CRA is intended to encourage depository institutions to help meet the credit needs of the communities in which they operate, particularly in low-and-moderate-income neighborhoods. In addition to providing lending programs for first time home buyers and households of low and moderate-incomes, many lenders are also providing their expertise in housing by participating on area boards, commissions, and committees that address housing-related issues. U.S. Bancorp made over \$22 billion in loans and investments during

2005 to support the creation of affordable housing, economic revitalization, and organizations working with low and moderate income families. Key Bank emphasizes women and minority vendors in supplying products and materials for its locations and has taken the lead in working with new market tax credit projects, which have spurred the creation of jobs in low-income areas. Most area lenders participate in Colorado Housing and Finance Authority (CHFA) programs. CHFA's Home Finance Division offers a variety of programs for low-to-moderate-income Colorado residents for home purchases – many of which are for first time home buyers. These programs include the MRB First Step, Taxable Home Opener, HomeAccess and HomeAccess Plus, and the Down Payment Assistance Program, which is administered through the Colorado Housing Assistance Corporation (CHAC). The HomeAccess and HomeAccess Plus programs are for persons with disabilities, or for parents of a child with disability.

Most lenders participate in traditional FHA and VA loan programs. These programs allow 97% to 100% financing with minimal or no closing costs. Credit history must be very good in order to participate in the 100% program. In addition, there are several area lenders that offer notable programs for first-time buyers, or buyers of low-to-moderate income levels. These programs include 1st Bank's Super Affordable Housing Program and the Affordable Housing Program; Wells Fargo's Community Development Mortgage Program; and Valley Bank and Trust's First Time Buyers and Moderate Income Buyers Programs. These loan programs have low closing costs; low down payments, with down payment Assistance available; and home ownership counseling is typically provided and/or required.

In general, underwriting requirements for most home loan programs have become more flexible in recent years. A more common sense approach to underwriting tends to be used more often, including evaluating alternative factors such as self-employment history, allowing greater debt-to-income ratios, and using utility bill and other similar payments for credit history. Many lenders use the credit score system, which places a heavy reliance on past credit history and as a result, may mean someone is ineligible due to past credit problems. Higher scores on this evaluation system typically means better interest rates, while lower scores mean higher interest rates. Home buyer classes are required with most loan programs for first-time buyers. These classes enhance the buyer's potential to retain their home and reduce the chance of a loan default, as well as prepare them for the cost of home ownership over time.

Several lenders noted that one of the biggest difficulties is affording the home purchase price on one income and in some cases, on two incomes. The gap between housing prices and incomes continues to increase in the metro area. Past credit history or a lack of credit history may also be issues, although there are now more options available to overcome these issues. Of particular concern, however, is that many of these options would be categorized as predatory lending. In past years, the biggest issue facing home buyers was the down payment. Now, it is the high cost of housing and credit history. An issue that may affect someone's credit history is identity theft. With the increased use of the Internet, it is easier to steal someone's identity through their credit cards and it may be difficult to repair one's credit once identity theft has occurred. Recent

thefts of personal information from agencies that were considered trustworthy in the past, has led to a growing concern about the theft and usage of personal information, such as social security numbers.

While there are more sources of down payment assistance now than there were several years ago, the down payment is still typically the largest financial hurdle for first time home buyers to overcome. Down Payment Assistance programs are provided by a number of agencies, including the Adams County Housing Authority, Aurora Housing Authority, Commerce City Housing Authority, Colorado Housing and Finance Authority (CHFA), and the Colorado Housing Assistance Corporation (CHAC). These agencies also provide home buyer classes, which are required in order to receive down payment assistance.

An increasingly common phenomenon in recent years is predatory lending, which means manipulating the borrower or taking unfair advantage of them. This type of lending is designed to strip the equity from the owner of a property and often results in forcing the homeowner into foreclosure. The loan is usually intended to be refinanced repeatedly, known as flipping. The payments may be too large for the borrower to reasonably make and there are high fees and points paid to the lenders, real estate brokers, and/or appraisers. With recent low interest rates and brisk home sales, there are more mortgage companies than there were several years ago competing for business, as well as numerous lenders available on the Internet. Many of these lenders use predatory lending practices to target seniors and others who may be house rich and cash poor. First-time home buyers may also be targeted, as they tend to be less informed and less experienced with the process of buying a home. Low-income families and/or those with bad credit history may be targeted by sub-prime lenders, who loan at much higher interest rates to offset what they consider to be greater credit risks. HUD-approved agencies that provide housing counseling, such as the Adams County Housing Authority and Brothers Redevelopment, Inc., can provide information and counseling on predatory lenders and how to avoid them.

Recent Colorado legislation related to foreclosures is intended to address some aspects of predatory lending. SB 06-71, signed May 30, 2006 (Colorado Foreclosure Protection Act), regulates foreclosure consultants and equity purchasers by requiring a written agreement between them and homeowners. HB 06-1323, also signed May 30, 2006, mandates fines for theft by deception in a residential real estate mortgage lending process. HB 06-1161, signed June 2, 2006 (Mortgage Broker Registration Act), requires mortgage brokers to be registered with the Colorado Division of Real Estate after January 1, 2007. Registration requires a criminal background check conducted by the Colorado Bureau of Investigation and a \$25,000 surety bond. Registration is for individuals, not companies and the only exemptions are employees of banks, savings and loans, credit unions, and FHA-approved mortgagees. This legislation is expected to identify those mortgage brokers that have criminal records and prevent their registration and operation in Colorado, potentially reducing predatory lending.

Reverse mortgages, also known as home equity conversion mortgages, have been increasingly popular over the past several years for seniors. Many people still do not understand how these mortgages work and as a result, may not take advantage of them. Reverse mortgages are HUD-insured and are available to seniors 62 or older, who use the home as their primary residence. A

reverse mortgage loan value amount is determined based on the age of the homeowner, value and location of the home, and interest rate. This loan value amount is first used to pay off any existing mortgage and the remaining value can then be used for living expenses, etc. There is no mortgage payment – typically the largest monthly expense someone has – since any existing mortgage is first paid off when the reverse mortgage loan is settled at the time the property is sold. The title of the home remains in the owner's name and the owner is responsible for payment of property taxes and homeowner's insurance. A counseling session with a HUD-approved agency (such as the Adams County Housing Authority) is required of the homeowner prior to entering into such a mortgage. Any additional value can be paid to the owners as they stipulate, such as in a monthly payment. When the property is sold, the reverse mortgage is paid off and any remaining equity is paid to the owner or their estate or heirs.

The increasing high rates of foreclosure seen in Colorado and Adams County have often been a result of adjustable rate mortgages or those with interest-only payments required. As interest rates began to increase over the past year, home buyers have been willing to accept adjustable rate mortgages that may start at a fairly low level of interest. Once the adjustment period begins, they may not be able to afford the increased payments and as a result, may end up losing their home to foreclosure. Interest-only payments defer payment of the principal, resulting in a much lower monthly payment, but these loans typically have a balloon payment deadline, where the principal balance must be paid in one lump sum, or be refinanced. Both of these types of loans gamble with interest rates, as rates can fluctuate significantly over the course of a year or longer. Rates have recently dropped slightly, but homeowners take on a significant risk when rates are increasing.

The Mile High Housing Fund (MHHF) invests in affordable housing opportunities for low-income communities. Low-cost, flexible loans are offered to real estate developers to support projects that do not have access otherwise to financing. Since its inception in 2000, MHHF has financed 2,500 units of affordable housing – 51 for-sale units and 2,449 rental units. A maximum of \$1.5 million can be loaned to a single borrower. Loans include pre-development loans (market studies, feasibility reports, engineering reports, etc.); acquisition loans; construction loans; bridge loans; and mini-permanent loans for gap financing of three to five years. Interest rates and maturity dates vary, depending on the loan type and project risk profile. Investors in the fund include the City and County of Denver; Fannie Mae Foundation; cities of Arvada, Boulder, Glendale, Englewood, Lakewood; Colorado Housing and Finance Authority; and several local banks. While this fund has not been used to construct housing units in Adams County to date, funding has been provided to non-profit agencies and for-profit developers that do work in Adams County, and the fund is available for the seven-county Denver metro area.

The Enterprise Foundation has also been a source of funding for a number of area housing non-profit agencies. Enterprise has been in Denver since 1994 and since that time, has invested over \$6.4 million in local organizations to build or rehabilitate more than 4,400 affordable for sale and rental homes. Plans are to continue support for the creation of 1,400 additional affordable homes in the metro area. Organizations that have been the beneficiaries of Enterprise grants include Colorado Coalition for the Homeless, Habitat for Humanity, Mercy Housing, and Thistle Community Housing, which has resulted in over 450 affordable housing units in Adams County.

The Metro Mayors Caucus is an organization of mayors of 32 participating cities in the Denver Metropolitan area. Between 1998 and 2002, the Caucus provided over \$106 million for down payment assistance and below market mortgages for low and moderate-income home buyers in member communities. A new program involves the collaboration of the Caucus and Colorado Housing and Finance Authority (CHFA) in funding transit-oriented development (TOD) in the metro area. The cities of Arvada, Centennial, Denver, Lakewood, Littleton, Northglenn, and Westminster pooled their Private Activity Bonding (PAB) authority to provide financial incentives for affordable rental housing to be included in TODs. CHFA matched the member contributions and as a result, \$50 million is available for the issuance of bonds to finance rental projects selected for funding. Projects financed with PAB must include a minimum number of units with affordable rents for those earning at or below certain income levels. Use of such bonding authority can lower debt financing for these projects, as well as create valuable federal income tax credits for developers.

A fairly unique way to assist home buyers in repairing their credit and purchase a home is being used by the Equal Housing Opportunity Partnership (EHOP). This organization's mission is to provide housing to those families and individuals who have stable, but low credit worthiness and at the same time, through the use of creative financing, repair their credit. Investors become partners with home buyers that are credit-challenged for a period of 12 – 18 months. The buyer selects a home and the investor provides the down payment and is essentially an unrelated co-purchaser on the loan. Making timely mortgage payments is an excellent to improve someone's credit rating. During the period the home owner participates in this program, their credit is monitored. At the end of the program, the home is refinanced and the investor is paid back. A fee is assessed to the participants of this program. To date, about nine homes have been purchased through this program.

The Colorado Housing Investment Fund Coalition believes that creation of a state housing trust fund is a useful tool to help solve Colorado's affordable housing crisis. Sources of funding for the trust fund that have been considered include a state real estate transfer tax and a state document recording fee increase. Either of these measures could raise significant annual amounts for a trust fund. The trust fund would be used to provide grants and loans to private for-profit and non-profit housing developers to encourage the creation, renovation, and preservation

of affordable housing. HB 1331, which was intended to better meet affordable housing needs in Colorado, was vetoed by Governor Owens in 2005. Nearly 40 other states have housing trust funds, using a variety of ways to fund these trusts.

Discrimination in mortgage lending is prohibited by the Fair Housing Act (FHA). The FHA makes it unlawful to engage in lending practices based on race, color, national origin, religion, sex, familial status, or disability. Lending practices could include refusal to make a mortgage loan or to provide information regarding loans; imposing different terms or conditions on a loan, such as different interest rates, points, or fees; discriminating in the appraisal of a property; or to refuse to purchase a loan. Sub prime lending has become more prevalent for individuals or families who have credit issues. While these loans can still play an important role in home ownership for some, they typically cost more and have less desirable terms to offset what is perceived to be a greater risk to a lender. Recent reports indicate that sub prime lending may be more prevalent with minority borrowers. Based on 2002 HMDA data analyzed by HUD staff, HUD identified 183 sub prime lenders and 19 manufactured home lenders, including several well-known prime market lenders who also have business in the sub prime market.

Home Mortgage Disclosure Act (HMDA) data was obtained for the Denver Metropolitan Statistical Area (MSA), which includes Adams County as well as the other metro counties to use to evaluate lending history. This information provides an overview of mortgage lending practices within the Denver area. This data is for the Reporting Year of 2004. Specific areas to evaluate (which may suggest potential discriminatory practices or trends) include high denial rates for minority and female applicants; very low denial rates; unusually low levels of applications from women, minorities and low and moderate-income persons; and a high number of applications withdrawn by minority applicants, as compared to non-minority applicants. Table 15 on the next page provides information on mortgage loans for one – four dwelling units, broken out by race, for 2004.

Table 15: Home Mortgage Disclosure Act Data (HMDA) 2004 - loans for 1-4 family dwellings by race for FHA, FHMA, VA & Conventional - Denver MSA, CO*

Race/Sex	Applications Received	Applications Approved & Originated/% of Number Received	Applications Denied/% of Number Received	Applications Withdrawn/% of Number Received	Applications Incomplete/% of Number Received
Asian/Pacific Islanders	3,500	2,294 / 65.5%	543 / 15.5%	295 / 8.4%	63 / 1.8%
African Americans	4,928	2,878 / 58.4%	1,015 / 20.6%	412 / 8.3%	116 / 2.3%
Hispanics	15,803	9,442 / 59.7%	3,266 / 20.6%	1,394 / 8.8%	396 / 2.5%
Native Americans	1,878	1,100 / 58.6%	373 / 19.8%	211 / 11.2%	62 / 3.3%
Other/ Race not available	17,372	3,357 / 19.3%	843 / 4.8%	701 / 4.0%	107 / .06%
Race/Sex	Applications Received	Applications Approved & Originated/% of Number Received	Applications Denied/% of Number Received	Applications Withdrawn/% of Number Received	Applications Incomplete/% of Number Received
Whites	86,670	61,957 / 71.5%	10,546 / 12.1%	6,556 / 7.5%	1,356 / 1.5%
two or more races	101	75 / 74.2%	9 / 8.9%	4 / 3.9%	2 / 1.9%
Males*	40,172	25,939 / 64.5%	6,442 / 16.0%	3,821 / 9.5%	796 / 2.0%
Females*	28,345	18,824 / 66.4%	4,127 / 14.5%	2,606 / 9.1%	475 / 1.6%
Male/Female filed jointly*	46,394	30,386 / 65.5%	4,181 / 9.0%	3,374 / 7.2%	583 / 1.2%

Source: 2004 HMDA Data - FFIEC

* Note: Numbers do not always equal total number of applications received. In some cases, race, ethnicity, and/or gender was not available and is not included. Loans that were approved but not accepted are not included in totals.

The lowest percentage of loan applications approved was for the other race at 19.3% and African Americans at 58.4%. Asian/Pacific Islanders had approval rates of 65.5% and Whites had approval rates of 71.5%. Denial of applications was lowest for the other race at 4.8% and for two or more races at 8.9%. The highest denial rates were for African Americans and Hispanics at 20.6%. Withdrawn application rates were lowest for the two or more race category, at 3.9% and the other race at 4.8%, while the highest rates were 11.2% for Native Americans. Incomplete

applications were most prevalent for Native Americans, at 3.3% and Hispanics, at 2.5% and lowest for the other race , Whites at 1.5%, and Asians/Pacific Islanders at 1.8%.

Women had a higher percentage of loan applications approved (66.4%) than men (64.5%) and also had a lower rate of denials (14.5%) than did male applicants (16.0%). Women also had a lower rate of application withdrawal (9.1%) and of incomplete applications (1.6%) than men, who had 9.5% of applications withdrawn and 2.0% of their applications deemed incomplete.

Table 16 below shows the income levels of applicants, based on percent of area median income (AMI).

Income of Applicants (% of Area Median Income)	Applications Received	Applications Approved & Originated/% of Number Received	Applications Denied/% of Number Received	Applications Withdrawn/% of Number Received	Applications Incomplete/% of Number Received
Less than 50% AMI	8,621	4,860 / 56.3%	2,062 / 23.9%	908 / 10.5%	191 / 2.2%
50 – 79% AMI	31,073	20,580 / 66.2%	4,927 / 15.8%	2,635 / 8.4%	578 / 1.8%
80 – 99% AMI	17,731	12,336 / 69.5%	2,263 / 12.7%	1,512 / 8.5%	310 / 1.7%
100 – 119% AMI	13,746	9,705 / 70.6%	1,656 / 12.0%	1,089 / 7.9%	232 / 1.6%
120% or more AMI	37,867	27,228 / 71.9%	4,025 / 10.6%	3,131 / 8.2%	561 / 1.4%
Income not available	5,391	2,781 / 51.5%	741 / 13.7%	1,408 / 26.1%	144 / 2.6%

Source: 2004 HMDA Data - FFIEC

* Note: Numbers do not always equal total number of applications received.

The highest number of applications received were from applicants with incomes of 120% of AMI or more and those applicants with incomes of 50 – 79% of AMI. The loan approval rates were the highest for those applicants with incomes of 100 – 119% AMI and 120% or more of AMI, while the lowest approval rates were for the income not available category and the applicants with less than 50% AMI. Loan denial rates were highest for the applicants with under 50% AMI and were nearly double the rate of any of the other income levels. This could be due to the low level of incomes, and/or a potential for some level of discrimination to occur. The rates for withdrawn and incomplete applications do not show much variation, with the exception of the rate of applications being withdrawn for the income not available category. There is no apparent logic behind why this segment shows such a large rate of withdrawn applications at 26.1%, compared to the other rates that range from 7.9% - 10.5%.

Although the HMDA data is not conclusive, it does show loan distributions at proportions somewhat indicative of the population makeup and it does show minority applicants generally receiving lower rates of loan approvals and higher denial rates. Data for female applicants does not indicate any discrimination, as females appear to be securing loans at slightly higher rates than males, although the number of total applications by females is lower than males. It is also important to note that this data is for the entire Denver MSA and not just Adams County. Mortgage data should be evaluated periodically to ensure that there are no racial or demographic trends occurring, nor any discrimination on the basis of gender. A recent paper by the National Council of La Raza presented to the U. S. House of Representatives Committee on Financial Services discussed how the 2004 HMDA data is different from data previously available. Of particular concern to the National Council was the lack of information to be able to analyze who is receiving sub prime loans. A review of HMDA data by the Center for Responsible Lending noted that Hispanic families are 30.0% more likely than Whites to receive sub prime loans. Current HMDA data does not include this information, nor does it include credit scores and other information needed to make a comprehensive analysis of this data.

Probably the biggest obstacle to purchasing a home in Adams County or the Denver metro area is the high home prices. For many people, credit history is also an obstacle. The housing discrimination complaint data shows very few complaints being filed that were related to the sale of a housing unit. With the trend of low interest rates over the past five years, many new lenders got into the home mortgage business and while the high number of foreclosures may indicate a lack of good judgment on the part of some lenders who may have sold more home than their buyer could afford, there is nothing discriminatory about such lending unless it is specifically targeted toward minority persons or persons of Hispanic origin. **Conclusion: Area lending practices do not appear to be impediments to fair housing choice; however, the high number of foreclosures and credit history are impediments to fair housing choice.**

D. Public and Private Sector

1. Fair Housing Enforcement:

Fair housing enforcement is handled by the U. S. Department of Housing and Urban Development Office of Fair Housing in Denver, as well as the Colorado Civil Rights Division in Denver (see Section Three of this report). The area housing authorities and other local housing organizations and advocates refer housing discrimination complaints to the Civil Rights Division or to HUD. There are fair housing enforcement mechanisms in place and there is data on formal housing discrimination complaints showing that housing discrimination is taking place. There may also be unreported discrimination occurring in the community. Participants in the County's Community Needs Assessment indicate that they believe housing discrimination is taking place in housing units within Adams County and its municipalities. Several instances of potential discrimination were noted during the focus groups held for this study. **Conclusion: Based on information gathered during this study, housing discrimination appears to be occurring in Adams County and its municipalities and is an impediment to fair housing choice.**

2. Informational Programs: Informational programs on fair housing are offered by a number of local agencies and organizations. The Colorado Coalition for the Homeless also has a fair housing hotline and refers callers to either HUD or CCRD. Both the Adams County Housing Authority and Adams County Community Development provide information for residents about fair housing and housing discrimination. Informational programs and/or training about fair housing is offered by the Apartment Owners Association of Metro Denver (AAMD). The Association has membership from apartment managers and large apartment complexes throughout the Metro area. The association provides fair housing training for anyone that is a member of the association and includes topics such as foreign residents and fair housing laws; rental criteria; occupancy guidelines; and steering. Advanced fair housing courses are also offered to AAMD members. A more recent type of training that falls within the fair housing realm is terrorism training. This training is oriented toward apartment managers to assist them in making sure they are not renting apartments to terrorists and at the same time, not discriminating against anyone. Owners of small apartment developments or individual units may not participate in AAMD and they may not be aware of what constitutes housing discrimination, or that it is illegal. **Conclusion: Local informational programs are supportive of fair housing choice; however, residents and some landlords may not be aware of the availability of this information.**

SECTION FIVE
*Assessment of Current Public and Private Fair Housing Programs
and Activities in the Jurisdiction*

A. Actions and Programs

The departments that administer the CDBG, CSBG and HOME programs for Adams County have internal policies that are supportive of affordable housing and fair housing choice; however, there are no formally-adopted county policies to promote affordable or attainable housing. The City of Brighton has policies and programs in place to support attainable housing. These programs involve waiving and/or reducing fees associated with the development of new housing that are collected with building permit issuance, and may include reductions and/or waivers in water and sewer plant investment fees; traffic impact fees; drainage impact fees; neighborhood and community park development fees; bridge and/or crossing fees; and open space cash-in-lieu fees. **Conclusion: The existing housing actions and programs offered by the Adams County Office of Community Development and the Housing Authority are supportive of fair housing choice; however, there are no formally-adopted county policies on affordable or attainable housing.**

B. Housing Rehabilitation

Adams County Community Development operates a housing rehabilitation program for properties located in Adams County, which can be used for loans, technical assistance, and contract management for eligible properties. Top priority is given to those items needed to establish safe, sanitary, and energy efficient dwellings. The property must be a single-family residence and the applicant must own the property and use it as the primary residence. A minimum of \$15,000 equity in the property is needed for a loan and the home's appraised value cannot exceed \$239,849 before rehabilitation. There are also household income limits that must be met. Loans up to \$24,999 are available, with interest rates from 0% - 3%, as is a deferred loan, where payment is deferred until the property is sold, or is no longer the primary residence.

Adams County Community Development also offers a Rental Improvement Loan Program with 1st Bank of Adams County. This program offers low-interest loans, with no appraisal, loan origination, document, or closing fees. There are no income limitations and loans of up to \$50,000 may be obtained on either five-year or ten-year terms. Eligible improvements include roof repairs or replacement; foundation work; interior improvements; or plumbing or electrical work. Properties must be within the target areas as defined by Adams County.

The City of Thornton has the Help for Homes Program, which is a volunteer-based home improvement program. Assistance is provided for minor repairs by funding from the Thornton City Council, donations from local businesses, and volunteer labor. Qualifications for this program are for low and moderate-income households; senior or physically-challenged households; Thornton residents who live in and own the home proposed for repair; extent of repairs to address health, safety, and sanitary conditions of home; willingness of home owner to contribute; and ability for repairs to fall within the scope of the program. A maximum of \$4,000 (\$2,000 in donated labor and materials, \$2,000 in grant funds) is available. Eligible repairs may include roofing, electrical, or plumbing repairs; ramp construction; public safety improvements (locks, smoke detectors); and minor landscaping. To date, over 70 homeowners have received assistance through this program. The City also provides seasonal home maintenance guides to assist homeowners to properly maintain their homes, and conserve water, energy, and the environment with landscaping. The City of Thornton also has a Housing Rehabilitation Program that is coordinated through the Adams County Housing Authority, to provide low-interest loans or grants for more major repairs. To date, 47 Thornton homeowners have received assistance through this program.

The Northglenn Neighborhood Development Corporation (NNDC) operates the Home Ownership Pride Program (HOPP) which is a program committed to revitalizing Northglenn by renovating the community's existing housing stock. NNDC and the Home Ownership Pride Program's mission is to encourage home owner reinvestment to improve residential neighborhoods and pride in ownership. Many of the homes located in Northglenn are too small for today's needs, yet they are in good shape due to the original quality of construction. Additions and/or remodeling are solutions for updating these homes to attract new buyers. NNDC sells memberships for \$50, which buys members access to discounted architectural design services; a fast track review by the City of home improvement plans; and participation in seminars and other community partner programs. Design assistance is used for remodeling; pop-ups (adding a second or third story); adding a room; or for landscape improvements. NNDC is currently renovating two homes that will then be sold to new home owners after the improvements are completed.

Aurora has a housing rehabilitation program that can be used to fund improvements to owner-occupied single-family homes, using a deferred repayment, low-interest loan. To be eligible, homes must be the primary residence of low and moderate-income owners. A similar program is available for the rehabilitation of multi-family rental units, with at least 51% of the units occupied by low and moderate-income households. There is also a Handicapped Accessibility Loan Program intended to provide accessible, single-family home repairs, pending future funding. This program could provide improvements such as ramps, chair lifts, door widening, kitchen bathroom repairs, and other accessibility-related repairs and improvements. The Commerce City Housing Authority also provides housing rehabilitation loans to low and moderate-income households and rehab programs are also available in Arvada, and Westminster.

Brothers Redevelopment, Inc. (BRI) has a Home Maintenance and Repair program for low-income seniors and persons with disabilities. This program operates on a sliding scale, based on the homeowner's ability to pay. Housing rehabilitation programs have been particularly successful at keeping seniors living independently in their own homes for a longer period of time, and in maintaining the quality of housing stock. The Adams County 2006 Action Plan has a goal of rehabilitating 285 housing units during the 2006 program year. **Conclusion: The local housing rehabilitation activities are supportive of fair housing choice and appear to be in adequate supply.**

C. New Construction/Acquisition of Existing Housing Stock

Habitat for Humanity of Metro Denver has been constructing homes in the metro area since 1979 and has built about 250 homes as of early 2006. Habitat has built more than 20 homes in Adams County since 2002 and plans four homes in Adams County in 2006. Habitat serves many families, including single-parent families and targets families at income levels of 50% of area median income and below. Habitat requires prospective home owners to provide sweat equity in the construction of their home. Annually, between 600 and 1,200 households are interested in participating with Habitat. In 2005, Habitat completed 28 homes in the metro area – their most in any given year. On average, it costs about \$75,000 in materials to construct a Habitat home.

Rocky Mountain Mutual Housing Association (RMMHA) is a non-profit corporation that has developed, owned, and managed affordable housing in Colorado, Arizona, and Utah since 1992. A key element of RMMHA is that residents have a voice in the management and governance of their community. Residents and resident advocates make up 51% of the Mutual's Board of Directors. Resident members don't own their units, but pay a monthly housing charge instead of rent. RMMHA targets their housing units for households of 50 - 60% of area median income. Mountain Terrace Apartments in Westminster is owned by RMMHA and consists of 152 units with rents for families earning 45% of area median income. The pride of ownership residents have from participation on the Board is critical to the success of this approach. RMMHA also provides matching funds for down payment assistance and financial management classes to assist first-time homebuyers. Future plans for RMMHA include the acquisition of additional housing units in Adams County, as well as the potential to partner with other area housing agencies to develop new housing units. The 150-unit Belle Creek apartment complex was developed by RMMHA, but has since been sold.

Mercy Housing, Inc. was established in 1981 in Omaha and has its national headquarters in Denver. It owns over 800 units of affordable housing in Colorado for low and moderate-income families, seniors, and persons with special needs. About one-half of Mercy's units are in the Denver Metro area, and include Holly Park in Commerce City. This development has 168 rental units, consisting of two, three, and four-bedroom units. In addition to developing and owning housing units, the Mercy Loan Fund provides loans to non-profit developers for affordable

housing financing, and provides property management and on-site programs for residents. In 2004, Mercy Housing became certified by HUD to acquire and resell HUD-foreclosed homes and purchased their first five homes. To date, nearly 50 homes have been purchased by Mercy and then resold to qualified buyers. When Mercy buys five or more houses from HUD, they receive a 15% discount off of the bid price for each home. Less than five homes purchased results in a 10% discount in the price of each. The money saved can then be put into any necessary renovation or rehabilitation before the home is put on the market. On average, homes resold by Mercy Housing are sold at about \$7,700 below appraised value. With the current inventory of foreclosed homes, as well as other homes on the market, it is getting more difficult to resell these homes and in some cases, home buyers may have unrealistic expectations on the amount of house they can afford. Ideally, Mercy Housing would like to acquire and resell about 75 homes annually. Home buyers must take home buyer classes to participate in this program.

Brothers Redevelopment, Inc. (BRI) has operated in the Denver Metro area since 1971, with a mission to provide safe, affordable, accessible housing and housing services for the low-income, seniors, and disabled populations in Colorado. Programs offered include Home Maintenance and Repair, Paint-A-Thon, Neighborhood Caretakers, and Home Counseling. BRI is a HUD-certified housing counseling agency that works with first-time homebuyers. They also provide default counseling for homeowners that are behind on their mortgage payments and work with seniors who are interested in reverse mortgages. In 2005, BRI counseled 1,663 families about home ownership and 388 seniors about reverse mortgages. BRI owns and manages 406 units of HUD-subsidized housing for low-income seniors and persons with disabilities, including 81 senior housing units in Westminster, at East Bay. In 2005, the Neighborhood Caretakers program, using a grant from the Community Development Office, painted, re-roofed, installed new siding and fences, and provided landscape improvements to residences in the Goat Hill neighborhood in southwestern Adams County. This year's Neighborhood Caretakers program provided repairs to 19 homes in the Goat Hill area again, including painting, yard clean up, and exterior repairs. BRI's Paint-A-Thon painted 87 homes for seniors throughout the Denver metro area in 2005 and the 2006 event is scheduled for later this summer.

Thistle Community Housing provides for the new construction of affordable housing units and renovates existing, older housing units. Thistle's work is based on the concept of a land trust, where Thistle retains ownership of the land, while the home owner buys the home on the land and signs a 99-year renewable lease for the land. Monthly fees for land taxes and administration are about \$25 - \$50. For purchasing the home at below market rates, the home owner agrees to limit the price of their home when they sell. This keeps these housing units permanently affordable. While the majority of Thistle's properties are in Boulder County, Thistle acquired Village by the Park in Northglenn in 2002. This development has 286 housing units, with – ground-floor apartments that can be made fully accessible. To date, Thistle owns 802 housing units – 591 are permanently affordable rental units and 211 are community land trust homes –

and has served over 9,000 people. Future plans include completion of the Blue Vista development in Longmont, with 198 permanently affordable homes; and 38 rental units among 140 market rate homes in Uptown Broadway in Boulder. Other plans include the acquisition and/or development of approximately 500 additional housing units, 200 – 300 of which would be located outside Boulder County, potentially in Adams County.

Private housing developers have built a fairly significant number of new housing units over the past five years in Adams County and its communities. Building permits for over 27,000 new housing units were issued between 2000 and 2004 in Adams County. This includes permits for non-profit as well as for-profit builders and developers; however, the vast majority of these units are not affordable for many persons. Over 25,000 new housing units are anticipated in the Brighton-Commerce City area by the year 2015, although very few are expected to be affordable as workforce housing. Developers cite high land costs, rising interest rates, the time spent in the development review process, and increasing construction costs as barriers to providing affordable housing units. Collaboration between public and private entities is needed to increase the number of affordable housing units in Adams County and its municipalities and sources other than federal funding will be needed. McDermott Properties has partnered with the Adams County Housing Authority in the acquisition, renovation, and sale of existing housing units and Hendricks Communities, LLC is partnering with the Brighton Housing Authority for the Brighton Village Senior Apartments. Such partnerships can mean tax savings for the developers in exchange for providing affordable or attainable housing that is safe, comfortable and well-built.

It is important to note that new housing for households that are below 60% AMI will tend to be provided by non-profit agencies and private developers will usually provide housing for those over the 60% AMI market. Housing for those with incomes at 40% AMI and lower will typically be rental units, while home ownership opportunities generally work best for households with incomes at or above 60% AMI. The Adams County 2006 Action Plan has a goal of creating 113 new housing units (100 rental units, five starter homes, and eight units of special needs housing).

Conclusion: New housing construction and the acquisition of existing housing stock is providing housing choices; however, there are few starter homes being built that are affordable or attainable for many households.

D. Rental Subsidies

The Adams County Housing Authority administers rental subsidies through 1,330 Section 8 vouchers, and 77 units of public housing for low income persons – 35 are scattered site single-family homes and 42 units for seniors and persons with disabilities at Casa Redonda de Vigil. The Authority serves families and/or individuals, including those with special needs including seniors and persons with disabilities. The Authority owns 1,067 units of affordable housing and partners on another 616 affordable housing units, for a total of 1,683 units. The Brighton

Housing Authority provides rental subsidies through 212 Section vouchers, 44 units of public housing, and 15 scattered sites of public housing. The Commerce City Housing Authority provides 80 Section 8 vouchers and 187 apartment units – 75 of which are for seniors. The Aurora Housing Authority administers 1,083 vouchers and 333 certificates in rental assistance. Public housing includes 121 units of senior housing and 80 scattered sites for families. The Westminster Housing Authority owns a 130-unit complex for seniors and persons with disabilities. All housing authorities have waiting lists for rental assistance and the wait for housing assistance can be from several months to several years, depending on the number of families on the list, type of unit requested, and availability of housing units. **Conclusion: Area rental subsidies are supportive of fair housing choice; however, assistance is needed to serve additional families and individuals.**

E. Emergency/Transitional Housing

Emergency and transitional housing are provided in Adams County by four primary agencies: ACCESS Housing, Inc., Almost Home, Inc., Growing Home, and Alternatives to Family Violence. ACCESS Housing, Inc. has shelter space for eight families, and nine transitional housing units, some of which, are located in Aurora. Shelter housing is available for 30 – 60 days, while the transitional units can provide homes for up to two years. Almost Home, Inc., has 14 shelter beds and 13 transitional housing units in Brighton and Commerce City. Growing Home houses families in 37 host locations, most of which, are churches and has a day shelter for families to use. Alternatives to Family Violence provides female victims of domestic violence and their children shelter at a safe house. The safe house has 21 beds and cribs and stays usually range from 45 – 90 days. All provide additional resources, such as food, counseling, training, and case management to assist individuals and families to move from homelessness, to transitional housing, and ultimately, to permanent housing. These agencies have waiting lists and must turn people seeking shelter away. This unmet need was identified in the Gap Analysis as an additional 310 beds for individuals and 210 beds for families. The County's 2006 Action Plan shows a goal of providing housing for 48 homeless families in emergency shelters and transitional housing and providing financial assistance for emergency housing to 350 low-income households. **Conclusion: Lack of an adequate supply of emergency and transitional housing is an impediment to fair housing choice.**

F. Language

The 2000 Census shows that between 1990 and 2000, the Hispanic population in Adams County increased by 54,117 persons - an increase of 28.2%. Based on 2000 Census information, 78.4% of the population in Adams County speaks only English, while 16.7% speaks only Spanish. Immigrants from nations that speak languages other than Spanish have also moved to the metro area and to Adams County. Based on 2000 Census data, 12.5% of the Adams County population was foreign born. The majority (69.7%) of foreign born residents were from Latin American

countries, while 17.5% were born in Asian nations. Spanish is the second most common language spoken by Adams County residents. The next most common languages are the Asian and Pacific Island languages, followed by the Indo-European languages. A greater number of realtors and lenders, as well as others involved in housing in the area are Spanish-speaking than there were five years ago. The Adams County Housing Authority and many of the area housing and related agencies offer publications in Spanish, as well as English and have bilingual staff members. Children of families may be able to translate, as they may be the first American-born generation with English as their first language. Also, there is often an internal network for translation where a friend or other relative may be able to translate and travels along with those who are Spanish-speaking.

As immigrants from other nations move to the metro area, it is anticipated that the need for translators of other languages will also increase. There are Hmong, Laotian, Afghani, Bosnian, Russian, and many other peoples and nations already represented. The Adams County Education Consortium notes that 62 different languages are spoken in Adams County. The staff of the Colorado Refugee and Immigrant Services organization notes that immigrants who come to Colorado may not be literate in their native language, nor can they speak English and unless their case manager or friend or family member can translate for them, they have a very difficult time accessing services. The Interpreters Network of Colorado provides translation services as needed. The Asian/Pacific Center for Human Development relies on an interpreter's bank to provide translation for nearly 40 Asian, Middle Eastern, and Central European languages to assist their clients. Both agencies noted that in addition to basic language barrier issues, many immigrants may not be literate in their own language, leaving them even farther behind in learning to speak and understand English.

The Adams County Community Needs Assessment included survey questions about bilingual communications. Of those surveyed, 2% said bilingual communications was the top priority for improvement and those surveyed in Aurora and Commerce City had greater concerns about bilingual communications than those surveyed in other communities. Non-English speakers tend to seek assistance from minority-serving organizations and in many cases, do not appear to be as well-informed as those residents that speak English. Survey results revealed that 29% of Asian Americans, 31% of Hispanics, and 28% of the multi-racial households surveyed believe that there is not enough emphasis on bilingual communication, while overall, 39% of survey participants believed too much emphasis was being placed on bilingual communication. Others surveyed noted that language barriers can hinder the feeling of neighborhood or community and that it is more difficult to build relationships with neighbors if they don't speak the same language. For the Community Needs Assessment, two Spanish-speaking focus groups were held and one focus group of Hmong residents was held. As the population continues to become even more diverse, a larger number of non-English speaking residents can be expected to reside in Adams County and the metro Denver area and many of these individuals and families will speak a language other than Spanish. During the focus groups on fair housing held for this report,

language was noted as a barrier by Spanish-speaking participants. One Spanish-speaking participant believed that this language barrier added to the time it took her to find housing and other needed services for her children. **Conclusion: Language is an impediment to fair housing choice.**

SECTION SIX

Public Involvement

The public participated in this study in several ways. Information for this report was gathered through research and a series of interviews conducted by the consultant with the staff and/or representatives of many of the participating agencies, organizations, and businesses. Nearly 100 different housing organizations, governmental agencies and advocacy groups involved in housing issues, housing providers, lenders and financial institutions, educational institutions and other organizations involved or interested in housing issues were contacted, or provided information and are listed beginning on Page 15 of this report.

Focus Groups

Public involvement was also provided through a series of focus groups that were formed to participate in a housing questionnaire and discussion. Seven focus groups were held and included seniors at the Senior Hub; public housing residents at the Adams County Housing Authority; women staying at a domestic violence safe house; residents of a mobile home community; residents at ACCESS Housing; Food Distribution clients; and Spanish-speaking residents. The questionnaire used with the focus groups is included in the Appendix. Fifty-nine Adams County residents participated in the focus groups and the questionnaire. Of the 59 participants, 47 (79.7%) were females, while 12 (20.3%) were males. Seniors were 41% of the participants, with the majority of them attending the senior focus group held at the Senior Hub. Participants of Hispanic origin made up 26 or 44.00% of those attending the focus groups, while African American participants accounted for 3 or 6.8% of the focus group attendance. There were 19 Spanish-speaking participants and some of these participants also speak English.

The majority of residents have lived in their current housing between two and six years; with the shortest duration being one day in a shelter and the longest being 50 years in the same home. Homeowners accounted for 21, or 35.6% of those participating, while 32 or 54.2%, reside in apartments or other housing units that they rent. Four of the participants were residing in a shelter, two were living with a friend or relative. Ten participants reside in single-family homes, 25 were residing in apartments, 15 were residing in mobile homes, five were in town homes, and four were temporarily living in a shelter. The number residing in the housing unit ranged from one to seven, with the majority of households being one – three persons. The participants in the Spanish-speaking focus group have family sizes of four persons or larger, which poses a problem in finding housing large enough to accommodate family size.

The most important or most significant difficulty cited was cost, followed by bad credit, unit size being too small for the family size, income, transportation, location, and accessibility for persons with a disability. One participant who spoke only Spanish said language has been a barrier for her. One person told about being discriminated against at a transitional housing organization, while another believed she experienced reverse discrimination because she is White and has

children. Another participant also believed she was discriminated against by a landlord because she has children. No other participants thought they ever experienced discrimination.

During the focus groups, participants were asked for their ideas about how to make it easier to find housing in Adams County. Participants had a number of good ideas and suggestions to make, many of which related to the distribution of information. Most people find out about services available to them by word-of-mouth, or by referrals. Many expressed frustration about how long it takes to find out about services beyond housing and food – basic services most seem to know about. Suggestions included having renter handbooks to give renters information about their rights and sources of assistance; creating a clearinghouse for information on housing and other services; ideas for improving information about the Adams County Housing Authority's Section 8 waiting list application period and the application process (better publicity about when the waiting list will be opened, splitting the two days of application alphabetically, and providing basic guidelines ahead of time so some applicants could determine whether they should apply or not); improving publication about the 211 system (local television stations); and specific locations for the display of information (bus stops, day care centers, schools, grocery stores, libraries, clinics, Laundromats). Another common theme that surfaced in focus groups were concerns expressed about how residents perceive they are treated by Social Services staff. One resident expressed their feelings by saying "Social Services staff lacks compassion and respect toward the people they are supposed to be helping". This sentiment was echoed at most of the focus groups.

Public Process

The public was asked to review and comment on the Impediments to Fair Housing Choice. Copies were provided to the municipalities via compact disc. The Adams County website hosts an electronic copy available to the public.

Adams County Community Development staff members continue to work with the Adams County Housing Task Force to disseminate Fair housing information to non-profits, advocates, social agencies, clients, customers, and the public in general. Promotion of Fair Housing is on-going.

SECTION SEVEN

Recommendations and Action Plan

The impediments to fair housing choice and recommended Action Plan in this section have been identified through interviews with agency, business, and organization representatives and through the focus groups held to discuss housing and fair housing. Impediments that have been identified are grouped together where there is a common theme, such as with the development-related impediments. The impediments are not listed in any particular order of priority, nor are the action steps prioritized other than by the suggested time frame. Each impediment includes a list of specific actions that are recommended to be undertaken to remove or alleviate these impediments.

Each action step includes a brief description of the proposed action, as well as the organizations potentially involved in implementing each action step. Some of the actions include participation by the member organizations of the Adams County Housing Task Force, which is a group of representatives of Adams County agencies and the municipalities in Adams County, as well as area housing and economic development agencies and organizations. This Action Plan is a five-year plan, so target time periods are given for each action to be undertaken and completed. Some actions will be on-going and are so noted.

It is important to note that Adams County is actively working on many of the identified impediments and their related actions identified in this section of this report. These recommendations and actions focus on expanding or continuing activities to strengthen the County's efforts to further fair housing and housing opportunity. While Adams County can act as a leader on furthering fair housing, each municipality within the county must also consider the recommendations of this study and choose how to incorporate the recommendations and actions into policies and practices appropriate for their particular community. It is also important to note that Adams County has a limited statutory authority to implement some of the recommendations contained within this report.

Impediments to Fair Housing Choice

1. Existence of housing discrimination – Based on the housing discrimination complaint data provided by HUD, limited housing discrimination appears to be taking place in the municipalities of Adams County, and is more commonly associated with rental housing rather than home ownership. Housing discrimination also appears to be occurring for persons with disabilities.

Actions:

Action 1A: Adams County Community Development and member organizations of the Housing Task Force will work cooperatively with area housing authorities and agencies, Apartment Owners Association, Association of REALTORS, HUD-FHEO, Colorado Civil Rights Division

(CCRD), and other relevant organizations to increase outreach on fair housing. This may include providing fair housing workshops, forums, and seminars on a regular basis using a variety of resources and techniques, including written materials, videos, round table discussions. These workshops, forums, and seminars should be available for residents, landlords, agency staff, and real estate and lending officials – begin late 2006 and continue as an on-going action

Action 1B: Adams County Community Development and member organizations of the Housing Task Force should consider increasing cooperation with fair housing enforcement agencies such as HUD-FHEO and CCRD to find ways to improve tracking and data collection on housing discrimination complaints – begin early 2007 and continue as an on-going action

Action 1C: Adams County Community Development and member organizations of the Housing Task Force and municipalities should consider increasing the frequency with which information is distributed to the community regarding fair housing. This includes at client intake, resource fairs, and other housing-related conferences and seminars – begin early 2007 and continue as an on-going action

Action 1D: Adams County will begin to explore options for improving communications between county departments/divisions and county residents and will encourage its municipalities to consider doing the same – begin early 2009 and complete by late 2009

2. Development-related impediments – These impediments include NIMBY-ism; land development costs and impact fees; growth management and design regulations; and the employment/housing/transportation linkage. NIMBY-ism often results from a lack of information and understanding. Those needing affordable or attainable housing today are often the working poor or newly poor and are not the unemployed of the past. Land development costs and impact fees have a significant affect on the cost of delivering affordable or attainable housing. Regulations such as residential design standards and growth management requirements can also impact the cost of housing. Transportation was raised as a key barrier to residents since in many cases, the location of the more affordable or attainable housing in Adams County is not in close proximity to transportation options. Transit-oriented development (TOD) can provide future significant opportunities to improve this barrier.

Actions – NIMBY-ism:

Action 2A: Adams County Community Development will increase cooperation with the municipalities, area Housing Authorities, area housing agencies, housing advocates, and area lenders to develop and participate in an Affordable Housing/Fair Housing Public Awareness

program to use throughout the county to increase the awareness about housing needs in the community – begin and complete by mid-2007

Action 2B: Adams County Community Development will use information obtained through needs assessments, surveys, Census data, etc. to put a face on those needing affordable or attainable housing and incorporate this information into Action 2A above – begin and complete by mid- 2007

Action 2C: The member organizations of the Housing Task Force will increase involvement in collecting, maintaining and distributing information and statistics on housing affordability, such as cost and supply of affordable or attainable housing stock – begin by mid-2007 and continue as an on-going action

Actions - Land development costs and impact fees, growth management and design regulations, employment/housing/transportation linkage:

Action 2A: The Adams County Planning office is encouraged to increase involvement with the Home Builders Association, area home builders and developers – both non-profit and for-profit-housing providers, and other interested groups and individuals to evaluate current regulations that may affect the provision of affordable or attainable residential development, including growth management/pacing systems and residential design standards – begin early 2008 and complete by late 2009

Action 2B: The Adams County Planning office should consider increasing involvement with the Home Builders Association, area home builders and developers, housing providers and other interested groups and individuals to identify possible solutions and alternatives for encouraging affordable or attainable housing developments, including such things as fee reductions, waivers, and/or rebates, as well as other ideas to assist in the facilitation of affordable or attainable housing, such as fast tracking – begin early 2008 and complete by late 2009

Action 2C: Adams County will consider encouraging the municipal planning offices in Adams County to undertake companion actions to Actions 2A and 2B above – begin early 2008 and complete by late 2009

3. Limited policies and programs to support affordable or attainable housing – New policies, programs, and regulations are often adopted without giving attention to how these items may affect the cost and provision of housing and in particular, affordable or attainable housing. Regulations designed to address a specific issue often result in creating other, unintended problems. With the exception of Brighton, there are no programs in place in Adams County to offer incentives for affordable or attainable housing.

Actions:

Action 3A: Adams County will consider establishing a policy to evaluate all goals, policies, regulations, and fees for their potential impact on the provisions of affordable or attainable housing – begin early 2007 and complete by mid-2007

Action 3B: Adams County will consider encouraging the municipalities of Adams County to consider establishing a policy to evaluate all goals, policies, regulations, and fees for their potential impact on the provision of affordable or attainable housing – begin early 2007 and complete by mid-2007

4. Limited supply of housing units (for low/very low-income households; larger units for families; emergency/transitional housing units; accessible units for persons with disabilities) – There is an on-going need for additional housing units for those persons at the lowest income levels, larger units that will accommodate families with several children; emergency and/or transitional housing for those persons that are homeless; and units that provide the needed accessibility for persons with disabilities. Although mobility impairment is often the first thing considered when talking about accessible housing units, there are other disabilities that require special housing needs, such as vision or hearing impairment, or disabilities that require a certain level of air quality.

Actions:

Action 4A: Adams County Community Development will continue to facilitate the provision of housing for low and very low-income households, large families with children, seniors, and persons with disabilities by directing subsidies to developments targeting these populations – this action is on-going

Action 4B: The Adams County Planning Office will promote a mix of housing unit types in all neighborhoods and new developments for residents of all economic levels, in locations that facilitate and promote the employment/housing/transportation linkage – begin early 2008 and continue as an on-going action

Action 4C: Area housing agencies will continue to provide services for those who are homeless, including the provision of additional shelter space and transitional housing opportunities, to assist in the prevention of homelessness – this action is on-going

Action 4D: Adams County Community Development and area housing agencies will pursue additional funding from public and private sources, for the provision of additional shelter space and transitional housing units – this action is on-going

Action 4E: Adams County and the member organizations of the Housing Task Force will continue to work with area housing builders and developers and housing organizations to encourage public-private collaborations for the provision of new rental housing units – this

action is on-going

Action 4F: Adams County Community Development will continue to work with area housing authorities and housing agencies and local lenders to distribute information about affordable or attainable housing mortgage programs in the area – begin early 2007 and continue as an on-going action

5. Limited supply of starter homes – With increasing home sale prices, there are very few homes available on the market that would be considered starter homes for households that are looking to buy their first home. The development of new starter homes is expected to take a collaborative effort between the public and private sector.

Actions:

Action 5A: Adams County Community Development and area housing agencies will pursue additional partnerships with public and private sources, for the development of new starter homes – this action is on-going

Action 5B: Adams County and the member organizations of the Housing Task Force will work with area housing builders and developers and housing organizations to encourage public-private collaborations for the development of new starter homes – this action is on-going

6. Language barrier – While improvements have been made over the past years in the amount of information that is available for Spanish-speaking residents, there are still instances where language is a barrier and in particular, for those residents who speak languages other than Spanish, where fewer translators are available.

Actions:

Action 6A: Adams County Community Development and area housing agencies will consider working with area educational institutions and organizations such as the Asian/Pacific Development Center and Colorado Refugee and Immigrant Services, to increase the access to translators and classes for those who need assistance with languages other than English – begin early 2007 and complete by mid-2007

Action 6B: Adams County Community Development will consider working with real estate and lending officials and area housing agencies to provide additional written materials in languages other than English – begin late 2008 and complete by mid-2009

7. Lack of resources (adequate income; adequate education and job skills; information) – Interviews with organizations and business representatives for this report commonly noted that inadequate incomes, as well as lack of education and job skills to earn an adequate income were significant barriers for residents. During focus group discussions, the difficulty in accessing information was raised by residents as a significant barrier and residents had a number of good

ideas and suggestions for addressing this topic. Suggestions were made for improving the

Section 8 waiting list process and concerns were raised about how Social Service customers perceive they are being treated.

Actions:

Action 7A: Adams County Community Development, Adams County Workforce and Business Center, and member organizations of the Housing Task Force will work with Adams County Economic Development and the Education Consortium to continue to identify ways of assisting in improving area income levels, increasing the number of jobs and in particular, higher paying jobs, and increasing job skills – this action is on-going

Action 7B: Adams County will work with area housing agencies and residents to seek ways of improving the distribution of information regarding housing and related services, including existing resource guides, 211 system, and publicity of Section 8 waiting list application periods – begin late 2006 and continue as an on-going action

8. Displacement/loss of housing units – Displacement of residents and a related loss of housing units has not happened very often in Adams County; however, if it does, finding new housing is very difficult for those displaced residents. There are expiring housing assistance contracts in 2006, as well as in 2009 – 2011. If these housing units become market rate units, there may be displacement occurring. The development of the Brighton Village Senior Apartments may also result in at least a temporary displacement. Housing stock that is in need of rehabilitation should be repaired and updated, so that these units are not eventually removed from the housing stock due to poor condition.

Action 8A: Area housing agencies will continue to provide support services for relocation, including housing counseling, to anyone that is displaced – this action is on-going

Action 8B: Adams County Community Development will work cooperatively and proactively with the area housing authorities, area housing agencies, housing providers, and owners of housing developments so that residents in existing housing units are not displaced – this action is on-going

Action 8C: Adams County Community Development and other agencies and organizations that provide housing rehabilitation funding will continue to promote the rehabilitation and retention of existing housing units – this action is on-going

9. Foreclosures and credit history problems: The high number of foreclosures is creating barriers for homeowners that lose their homes and suffer future credit problems as a result of the foreclosure. A history of bad credit is also a barrier for residents seeking rental housing, or first-time home buyers.

Actions:

Action 9A: The Adams County Housing Authority, member organizations of the Housing Task Force, lenders, area Housing Authorities and housing agencies that provide mortgage foreclosure counseling will work with the County Public Trustee's office to identify ways of providing effective foreclosure prevention for homeowners at early stages of foreclosure – begin late 2006 and continue as an on-going action

Action 9B: Adams County and the member organizations of the Housing Task Force will work with area credit agencies and organizations to identify ways consumers can improve their credit rating and provide this information to consumers – begin late 2008 and complete by late 2009

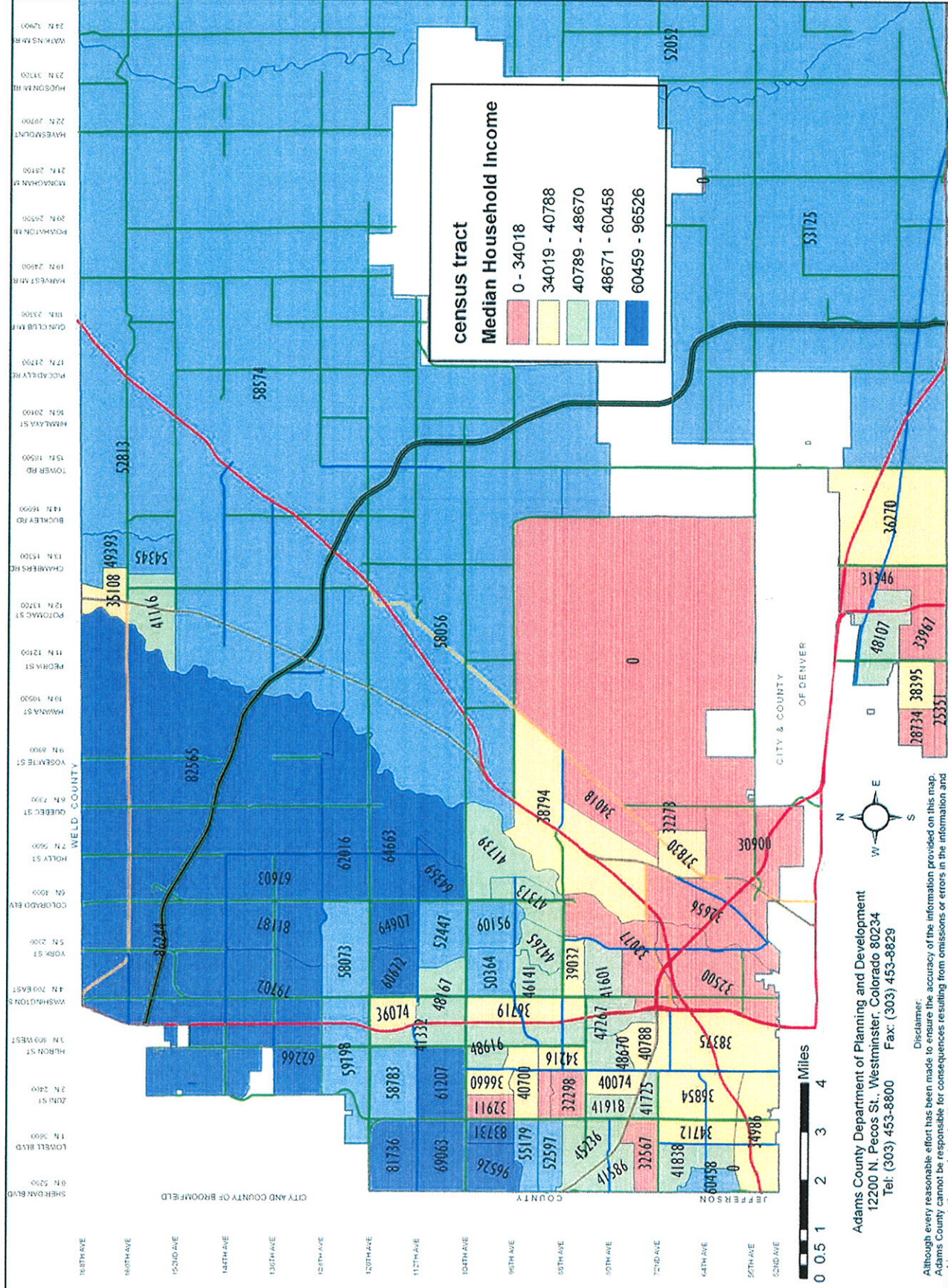
10. Lack of state regulations and standards governing mobile homes and mobile home communities – There are virtually no state regulations or standards that govern the operation of mobile home communities or the units within these communities. Given the large number of people in Adams County and its municipalities that reside in mobile homes, this is an opportunity to address an issue affecting affordable housing in the area.

Action 10A: Adams County and member organizations of the Housing Task Force will consider working with the Mobile Home Owners Tenant Association (MHOTA) or other mobile home tenant groups to explore options for encouraging the creation of mobile home regulations and standards at the state and local level – begin late 2008, complete by mid-2009

APPENDIX A

No public comments were received.

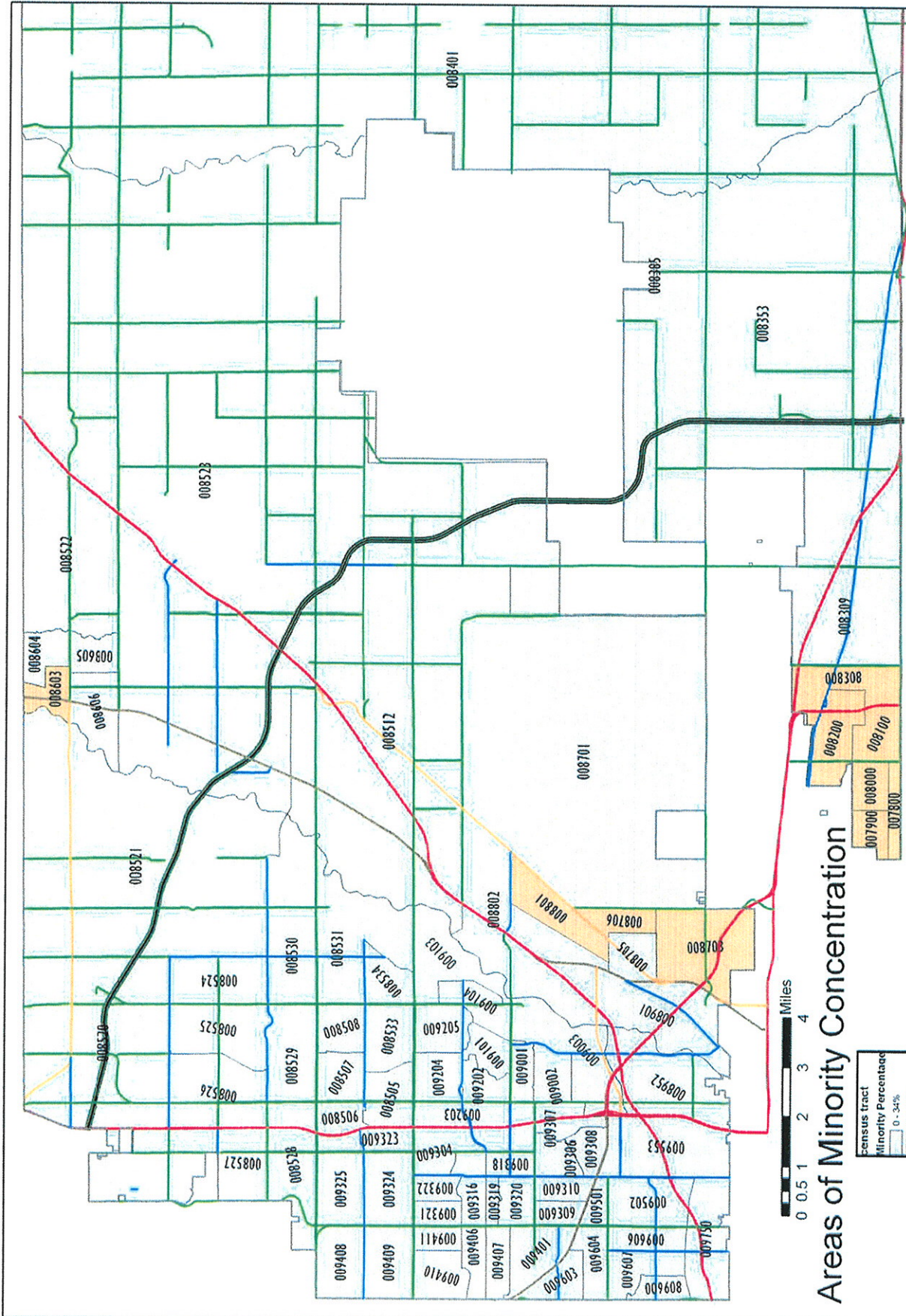
APPENDIX B
Maps



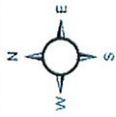
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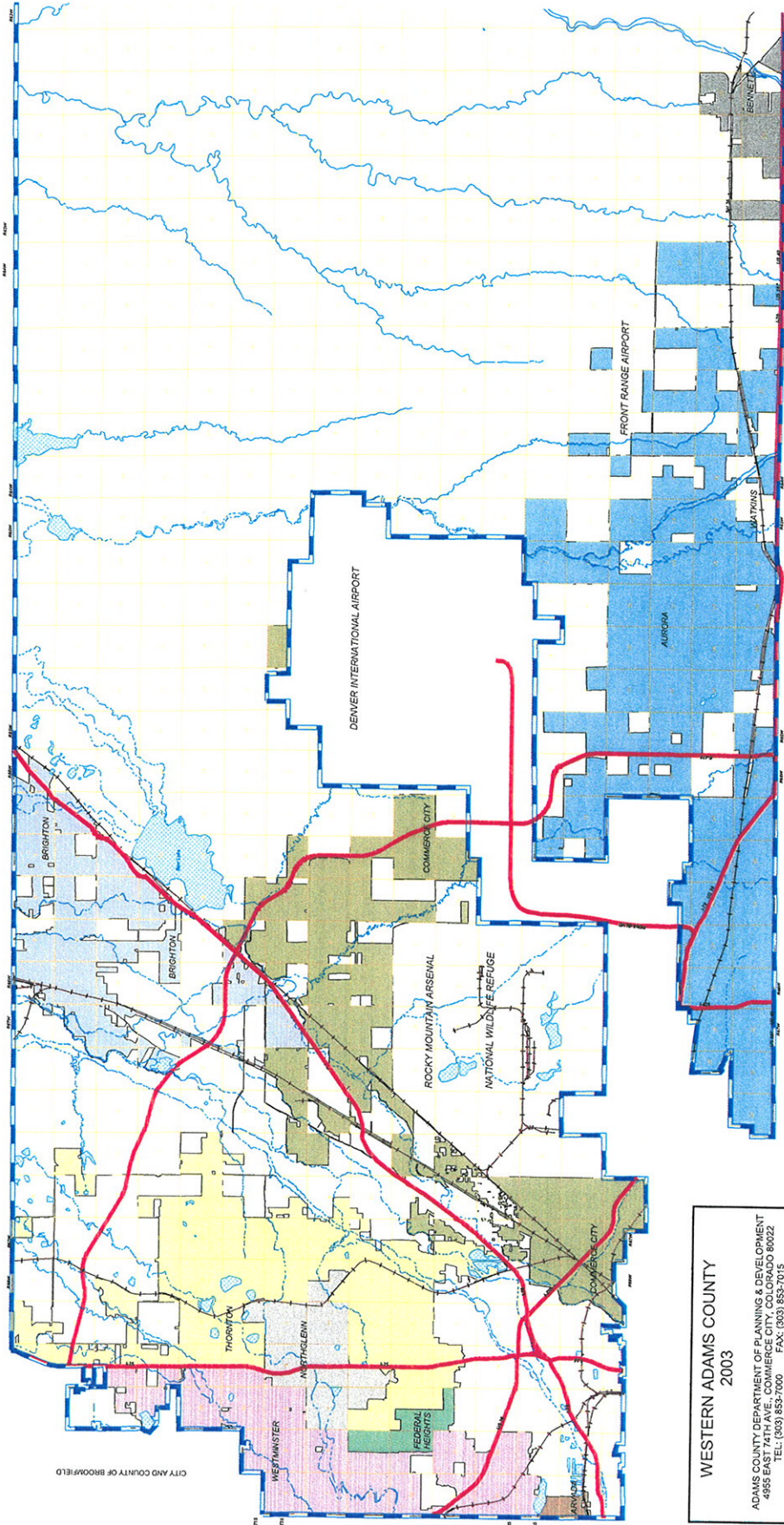


Areas of Minority Concentration

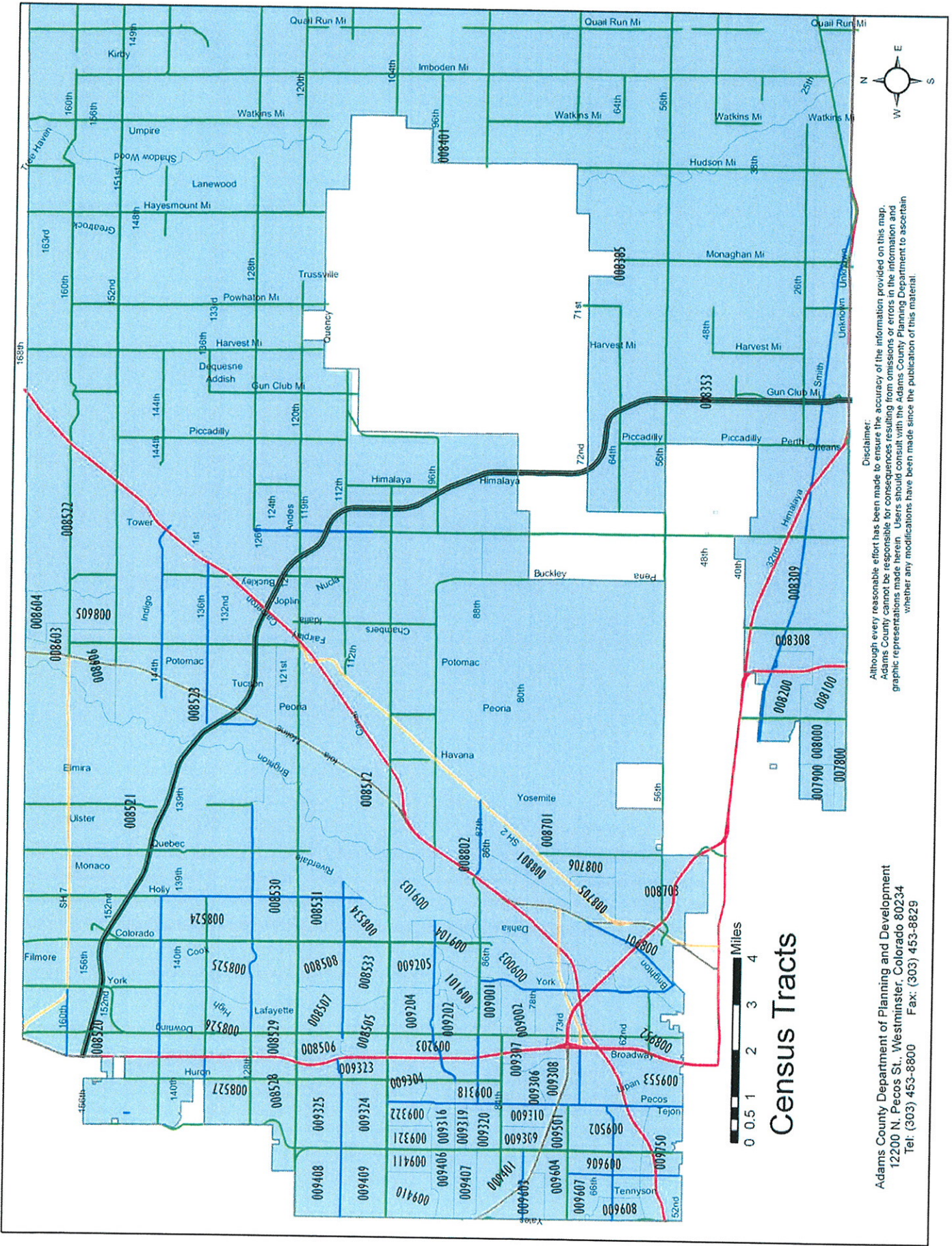


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Census Tracts

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ANALYSIS OF IMPEDIMENTS TO
FAIR HOUSING CHOICE - 2007
Adams County, Colorado


Chair, Board of County Commissioners


Date

Bibliography

- ACCESS Housing, Inc. A Shelter for Homeless Families brochure.
- Adams 12 Five Star School District. Five Star Journal, Vol. 5, No. 3, March 2006.
- Adams 12 Five Star School District. The Hispanic Advisory Council brochure.
- Adams County Building Section. Permit, Plan & Design Requirements; Construction Permit and Inspection Fee Schedule, 2006.
- Adams County Community & Economic Opportunity Department. Community Development, Head Start, Workforce & Business Center brochure.
- Adams County Community Development. Adams County Consolidated Plan, 2005 – 2009.
- Adams County Community Development. Adams County Rental Improvement Loan Program brochure.
- Adams County Community Development. Community Development brochure.
- Adams County Community Development. Food Security Assessment, Briefing for Housing Task Force, April 14, 2006.
- Adams County Community Development. 2004 Annual Report, 2005.
- Adams County Community Development. 2006 Action Plan.
- Adams County Community Transit. A-Lift brochure.
- Adams County Economic Development. Enterprise Zone Incentives brochure.
- Adams County Economic Development. 2006 Community Directory, 2006.
- Adams County Education Consortium. Build Business with Education.
- Adams County Food Distribution. FDC Summary Database 2003 – 2005.
- Adams County Housing Authority. 2004 Annual Report.

Adams County Housing Authority brochure.

Adams County Housing Authority. Housing Need Data, 2005 – 2006.

Adams County Housing Authority. Adams County Housing Authority's Family Self-Sufficiency Program brochure.

Adams County Housing Authority. Family Housing Low Income Apartment List, 2/21/06.

Adams County Housing Authority. First Time Home Buyers Down Payment Assistance brochure.

Adams County Housing Authority. Housing Assistance Contracts, August 2006.

Adams County Housing Authority. Housing Counseling Agency Fiscal Year Activity Report, 05/2006.

Adams County Housing Authority. Housing Counseling Services brochure.

Adams County Housing Authority. Resident Service Program, Enrichment Workshops brochure.

Adams County Housing Authority. Resource Guide, 3/13/2006.

Adams County Housing and Economic Development Taskforce. Guiding Housing Principles.

Adams County Interfaith Hospitality Network. Annual Report 2004.

Adams County LEAP. Adams County LEAP brochure (English and Spanish versions).

Adams County Office of Community Development. Housing Rehabilitation Program brochure.

Adams County Office of Community Development. 2004 Business Plan.

Adams County Office of Community Outreach. Analysis of Impediments to Fair Housing Choice, August 1, 1996.

Adams County Office of Emergency Management. Mobile Home Safety Guide brochure.

Adams County One Stop Career Center System. Job Seeker Services brochure.

Adams County One Stop Career Center System. You Have Choice brochure.

Adams County Planning and Development. Adams County Comprehensive Plan, January 2004.

Adams County Planning and Development. Adams County Development Standards and Regulations, January 10, 2005.

Adams County Planning and Development. The Southwest Adams County Framework for Future Planning, 2005.

Adams County Public Works. Traffic Impact Fee Acknowledgement Affidavit.

Adams County School District 14. District Profile, 2006.

Adams County School District 50. Community Resource Center Voices brochure.

Adams County School District 50. 2004 – 2005 Student and District Facts.

Adams County Social Services Department. Colorado Works Program brochure, 6/05.

Adams County Social Services Department. Food Assistance Program brochure.

Adams County Social Services Department. Program & Service Directory.

Adams County Workforce & Business Center. Where Opportunity Leads to Success brochure.

Almost Home, Inc. Apartment Vacancy Report, 3/13/2006.

Almost Home, Inc. FY 2005 Annual Report.

Almost Home, Inc. Hughes Station Apartments brochure.

Almost Home, Inc. Shelter, Housing and Assistance brochure, September 2005.

Alternatives to Family Violence. Alternatives to Family Violence Community Outreach and Support Services brochure.

Alternatives to Family Violence. Alternatives to Family Violence Get Hope! brochure.

Apartments for Rent, Denver/Boulder/Longmont/Fort Collins. April 14 – 27, 2006.

Arvada Press. Home is where the hope is, November 24, 2005.

Brighton Economic Development, Inc. Brighton Community Profile 2005.

Brighton School District 27K. 2004 – 2005 Annual Report.

Brothers Redevelopment, Inc. Helping People House Each Other brochure.

Brothers Redevelopment, Inc. The BRI Blueprint, Winter 2005 Edition, Vol.5, Issue 5.

City of Arvada. Arvada Comprehensive Plan, 2004.

City of Arvada. Community Development Department Service Fees, May 2005.

City of Arvada. Community Development Department 2006 Park and School Fees, 1/2006.

City of Arvada. Zoning Regulations, 2006.

City of Aurora. 2006 Action Plan, 2005.

City of Aurora. 2006 Aurora Guide, 2006.

City of Aurora. Comprehensive Plan, 2003.

City of Aurora. Consolidated Plan, 2005 – 2009.

City of Aurora. Fee Schedule 1, Zoning and Development Review, 2006.
Schedule 2, Engineering Control Division Fees, 2006.

City of Aurora. Home Ownership Assistance Program brochure.

City of Aurora. Residential Masonry Standards, 1/29/2005.

City of Aurora. Single Family Rehab Loan Program brochure.

City of Aurora. Water Department Development and connection Fee Schedule, May 1, 2006.

City of Aurora. Zoning Regulations, 2006.

City of Brighton. Accessible Housing Standards.

City of Brighton Community Development Department. New Commercial & Industrial Development; New Residential Development 2005 – 2006, February 2006.

City of Brighton. Agreement for Affordable Housing, Brighton Village (Brighton Senior Apartments), Phase 1, April 11, 2006.

City of Brighton. Agreement for Affordable Rental Housing, Hughes Station, 9/03/2002.

City of Brighton. Application for Affordable Housing Assistance.

City of Brighton. Attainable Housing Matrix.

City of Brighton. Brighton Comprehensive Plan, 7/8/03.

City of Brighton. Brighton Senior Center brochure.

City of Brighton. City Council Resolution No. 01-129, 11/04/2003.

City of Brighton. Fee Schedule, 2006.

City of Brighton. Hughes Station Development Agreement Amendment #1, 12/5/2003.

City of Brighton. Ordinance 1664, February 20, 2001.

City of Brighton. Ordinance 1737, April 2, 2002.

City of Brighton. Residential Design Standards, February 15, 2005.

City of Brighton. Resolution No. 02-39, April 2, 2002.

City of Brighton. Resolution No. 02-113, September 3, 2002.

City of Brighton. Resolution No. 05-65, May 17, 2005.

City of Brighton. Resolution No. 06-39, March 21, 2006.

City of Brighton. Resolution No. 06-54, April 4, 2006.

City of Commerce City. Annual Projections of Increases in Residential Units and Population: 2001 – 2010, 4/30/2004.

City of Commerce City. Commerce City Development Residents Projects in the Northern Range.

City of Commerce City. Community Planning and Development Services Park and School Fees, Planning Fees, 9/05.

City of Commerce City. Zoning Regulations.

City of Commerce City. 2005 Projection Survey, 1999 – March 2006.

City of Commerce City. 2006 Building Permit Valuation Summary.

City of Federal Heights. Federal Heights News, Volume 5, Issue 2, April 2005.

City of Northglenn. Town Center Planning District, 2002.

City of Northglenn. The Northglenn Connection, Volume XXXXI, April 2006.

City of Thornton. City of Thornton Growth Pacing System, 2006 Deadlines.

City of Thornton. City of Thornton Comprehensive Plan, 1997.

City of Thornton. Housing Related Services, April 2006.

City of Thornton. Inside Thornton, Summer 2006.

City of Thornton Business Development Office. Business Development: Questions and Answers brochure.

City of Thornton Business Development Office. Draft Industry Analysis, 2005.

City of Thornton City Development Department. Design Standards Guide Residential: Multifamily; Single Family Detached.

City of Thornton Community Development. Retirement Homes, Assisted Living and Nursing Care Facilities in the City of Thornton.

City of Westminster. Building Activity Summary Report, 01/01/2005 – 03/31/2006.

City of Westminster. City Edition Business Briefs, The City of Choice, April/May, 2006.

City of Westminster. Neighborhood Outreach Program, Community Oriented Governance (COG) brochure.

City of Westminster. Senior Housing Design Guidelines.

City of Westminster. Westminster Comprehensive Land Use Plan, June 28, 2004.

City of Westminster. Westminster's First Neighborhood.

City of Westminster. Growth Management Program for the Period December 11, 2000 through December 31, 2010.

Clodfelter, Nancy A. et al. The New Colorado Foreclose Act (HB 06-1387), August 30, 2006.

Colorado AIDS Project. Care Services Housing, 7/3/2006.

Colorado Association of REALTORS. Housing Opportunity Foundation brochure, July 2006.

Colorado Blue Ribbon Panel on Housing. Affordable Housing Solutions for Colorado, Final Report, March 2006.

Colorado Department of Labor and Employment. Colorado Employment and Wages by Standard Industrial Classification for 2000.

Colorado Department of Labor and Employment. Adams County Employment and Wages, Annual Average, 2005.

Colorado Department of Labor and Employment. Industry Employment Projects for Denver-Aurora MSA 2005 – 2007; 2004 – 2014.

Colorado Department of Human Services. Colorado's Aid to the Needy Disabled brochure, 7/02.

Colorado Department of Public Health and Environment. HIV and AIDS in Colorado: Monitoring the Epidemic, March 31, 2006.

Colorado Division of Housing. Adams County Rental Households by Income Group and Percent of Income Paid in Rent, 2004.

Colorado Division of Housing. Colorado Department of Local Affairs brochure.

Colorado Division of Housing. Deep Subsidy Rental Units in Colorado, January 2004.

Colorado Division of Housing. Housing Cost Projections as of January 1, 2003 and January 1, 2004, March 26, 2004.

Colorado Homeless Families. Colorado Homeless Families 2006 brochure.

Colorado Housing Counseling Coalition. Helping People Improve Their Housing Condition brochure.

Colorado Responsible Lending Task Force. Get the facts BEFORE you borrow against your home brochure.

Community Reach Center. Early Childhood Services, Supportive Counseling for New Mothers, The Visiting Place brochures.

Community Resource Center. Community Resource Line, April – June, 2006.

Community Resource Center. Success Strategies for Colorado Nonprofits.

Consumer Action. Fair Housing: It's Your Right – Discrimination in Housing is Illegal brochure.

Corona Research. Adams County Community Needs Assessment, Adams County, Colorado, 2003.

Denver Regional Council of Governments. Adams County Building Permit Inventory, 2000 – 2004.

Denver Regional Council of Governments. Average Annual Wages by County, 1990 – 2001.

Denver Regional Council of Governments. Community Profiles: Adams County, Arvada, Aurora, Bennett, Brighton, Commerce City, Federal Heights, Northglenn, Thornton, Westminster, June 1, 2006.

Denver Regional Council of Governments. DRCOG Counties, Housing Units, 2000 -- 2004.

- Denver Regional Council of Governments. Household and Population Forecasts 2005 – 2030.
- Denver Regional Council of Governments. Percent of Householders that Owned their Homes by Race & Ethnicity, Census 2000.
- Denver Regional Council of Governments. Top Ten Fast Growing Communities, 2000 – 2004.
- Denver Regional Council of Governments. 2004 - 2005 Employment Estimates.
- Ehrenhalt, Alan. Governing. The Bungalow Bind, June 2006.
- Equal Housing Opportunity Partnership. Credit Challenged Home Ownership Assistance brochure.
- First Reverse Mortgage USA. Consumer Guide to Reverse Mortgages: Separating Fact from Fiction, 2006.
- Gonzalez, Erika. Rocky Mountain News, A safe haven for families in transition, January 1, 2005.
- Growing Home. Growing Home, A Turning Point for Children & Their Families brochure.
- Habitat for Humanity of Metro Denver. Be A Homeowner brochure (English and Spanish versions).
- Habitat for Humanity of Metro Denver. Building Homes, Building Lives fact sheet, February 2006.
- Housing Colorado. Affordable Housing Barriers, November 2002.
- Housing Colorado. Change in Development Fees, 1998 – 2002, November 2002.
- Housing Colorado. 2006 Facts Book, 2006.
- Housing Justice. Budgeting for Poverty video, 2005.
- HUD User. HUD Sub prime and Manufactured Home Lender List, 2002.

McCombs, Brady. Greeley Tribune, Affordable-housing fund to get push, March 16, 2005.

McCormick and Associates, Inc. Adams County Housing Study, September 2002.

McCormick and Associates, Inc. City of Westminster Housing Needs Assessment, July 2003.

Metro Denver Homeless Initiative & Mile High United Way. Adams County Homelessness Point-In-Time Study, 2006.

Metrolist, Inc. Adams County MLS Single-Family Homes Sales Data 203 – 2005, 6/14/2006.

Miripol, Aaron. Building affordable solutions: community land trusts, Boulder County Business Report, 7/7/06.

National Council of La Raza. Home Mortgage Disclosure Act: Newly Collected Data and What it Means, June 13, 2006.

National Research Center, Inc. City of Arvada 2005 Citizen Survey, November 2005.

National Research Center, Inc. City of Westminster 2006 Citizen Survey, Report of Results, June 2006.

New Home Finder. Greater Denver/Northern Colorado, March/April 2006.

Northglenn Neighborhood Development Corporation. HOPP To It! Home Ownership Pride Program brochure.

Prieto, Bianca. Rocky Mountain News, Homeless shelter to end night service, April 19, 2006.

Rebhook, John. Rocky Mountain News, Home sale prices in June set new record, July 7, 2006.

Spooner, Debbie. Don't Lose Your Home, MFS Newswire, 7/5/2006.

Stobbe, Mike. Rocky Mountain News, Not dying quite as fast, April 20, 2006.

Tankersely, Jim. Rocky Mountain News, Refugees thank God for gifts of love, life, August 20, 2003.

- The Arvada Report. Expanding Housing For Homeless Families, April/May 2004.
- The Denver Post. Editorial: Pride of Ownership, August 30, 2000.
- The Denver Post. Olinger, David and Svaldi, Aldo. Homeowners in Brighton Skid Down Uneasy Street, June 18, 2006.
- The Denver Post. Svaldi, Aldo. What does the metro area's median price actually buy? April 23, 2006.
- The Denver Post/News. Real Estate Section, June 18, 2006.
- The Prime Time for Seniors, Volume 21, Number 1, Issue 241, July 2006.
- The Real Estate Book. Denver North, Mountains & Surrounding Areas, Volume 11, Number 4.
- The Retired & Senior Volunteer Program of Adams & Arapahoe Counties brochure.
- The Senior Hub Advisor. Volume 3, Issue 4, Spring 2006.
- The Senior Hub. 2004 Annual Report, 2005.
- The Senior Hub. 2006 Senior Solutions Resource Guide, 2006.
- The Seniors Blue Book Publication. A Seniors Resource Guide, North Metro Denver, May 2005 – 2006.
- Tumlinson, Terrell. Brighton Standard Blade. High land prices force different strategies, Volume 103, Issue 16, and April 19, 2006.
- U. S. Census Bureau. Adams County, Colorado County Subdivision and Place, Age and Sex: 2000.
- U. S. Census Bureau. Adams County, Poverty Profile, 2002.
- U. S. Census Bureau. American Factfinder, 2005 Population Estimates, Adams County, Colorado and Related Municipalities.
- U. S. Census Bureau. American Factfinder, Adams County, Colorado by County Subdivision and Place, Age and Sex: 2000.

U. S. Census Bureau. Profile of General Demographic Characteristics: 1990 and 2000; Profile of Selected Social Characteristics: 1990 and 2000; Profile of Selected Economic Characteristics: 1990 and 2000; Profile of Selected Housing Characteristics: 1990 and 2000 – Adams County, Arvada city, Aurora city, Bennett town, Brighton city, Commerce City city, Federal Heights city, Northglenn city, Thornton city, Westminster city.

U. S. Census Bureau. 2005 American Community Survey, Median Household Income by County: 2005.

U. S. Department of Homeland Security. 2006 Poverty Guidelines, 02/21/06.

U. S. Department of Housing and Urban Development. Accessibility Analysis of Model Building Codes, 2/23/2005.

U. S. Department of Housing and Urban Development. Are you a Victim of Housing Discrimination? Fair Housing is Your Right, 7/2004.

U. S. Department of Housing and Urban Development. Beware of Predatory Lending brochure.

U. S. Department of Housing and Urban Development. Don't be a Victim of Loan Fraud brochure, 2003.

U. S. Department of Housing and Urban Development. Fair Market Rents FY 2005 for Existing Housing, Federal Register, Vol. 69, No. 190, October 1, 2004.

U. S. Department of Housing and Urban Development. Fair Market Rents FY 2006 for Existing Housing, Federal Register, Vol. 70, No. 190, October 3, 2005.

U. S. Department of Housing and Urban Development. Housing Discrimination Complaint Data, Adams County, Colorado FY 2002 – FY 2006, July 18, 2006.

U. S. Department of Housing and Urban Development. How to Avoid Foreclosure brochure, May 2001.

U. S. Department of Housing and Urban Development. Proposed Fair Market Rents FY 2007 for Existing Housing, Federal Register, Vol. 71, No. 1115, June 15, 2006.

U. S. Department of Housing and Urban Development. Public Housing/Section 8 Income Limits, 2006.

U. S. Department of Housing and Urban Development. Relocation Assistance to Displaced Businesses, Nonprofit Organizations and Farms, September 2002.

U. S. Department of Housing and Urban Development. Relocation Assistance to Displaced Homeowners brochure, September 2002.

U. S. Department of Housing and Urban Development. Relocation Assistance to Tenants Displaced From Their Homes brochure, September 2002.

U. S. Department of Housing and Urban Development Center for Faith-Based and Community Initiatives. 10 Things Your Faith Community Can Do To Encourage Homeownership brochure.

U. S. Department of Housing and Urban Development Fair Housing and Equal Opportunity. Subprime Lending, 7/11/2006.

ValueWest, Inc. 2003 and 2004 Estimates Housing Costs by County, Prepared for the Colorado Division of Housing, March 26, 2004.

von Stroh, Dr. Gordon. 2005 Multifamily Housing Vacancy and Rental Survey, September 2005.

von Stroh, Dr. Gordon. 2006 Multifamily Housing Vacancy and Rental Survey, February 2006.

Westbrook, Debbie. 50 Plus Marketplace, Reverse Mortgages, May 2006.

<http://abcnews.go.com> Housing Woes: Interest Rate Increases and Foreclosures, published March 21, 2006, 5/1/2006.

<http://library3.municode.com> Residential Growth Management, 7/17/2006.

<http://municipalcodes.lexisnexis.com> Commerce City Chapter 21, Zoning, 7/17/2006.

www.1stbank.com Affordable Housing Programs, 7/27/2006.

www.aamdhq.org Metro Denver Fair Housing Training, 6/20/2006.

www.almosthomeonline.org Almost Home, Inc. Hughes Station: A Piece of our Past...Part of our Future, Shelter Success Story, 4/9/2006.

www.arapahoehouse.org Arapahoe House Programs, 7/24/2006.

www.arvada.org Arvada Transit Station Planning Project, 4/28/2006.

www.arvada.org Housing and Neighborhood Revitalization, 4/28/2006.

www.auroragov.org City of Aurora, Community Development Department: Homelessness Initiatives; Emergency Grants - Single-Family Repair Program; Housing Rehabilitation; Home Ownership Assistance Program, 5/1/2006.

www.briathome.org BRI Programs, Neighborhood Caretakers, 7/23/2006.

www.chieftain.com State foreclosure rate again tops nation, The Pueblo Chieftain Online, published Saturday, July 15, 2006, 7/22/2006.

www.ci.commerce-city.co.us Economic Development – Residential Opportunities, 4/17/2006.

www.ci.commerce-city.co.us Housing Authority Programs, 7/27/2006.

www.cityofthornton.net City of Thornton Finance Division, Water and Sewer Fees, 4/13/2006.

www.cityofthornton.net Comprehensive Plan, 4/13/2006.

www.cityofthornton.net Current Development Projects Map, 4/13/2006.

www.cityofthornton.net Help for Homes Program, Home Ownership Programs, Home Maintenance, Home Owner Housing Rehabilitation, 4/13/2006.

www.cityofthornton.net Housing Master Plan, 4/13/2006.

www.cityofthornton.net Noise Mitigation Plan FAQs, 4/13/2006.

www.cityofthornton.net Zoning, 4/13/2006.

www.ci.commerce-city.co.us Housing Authority Programs, 7/17/2006.

www.ci.westminster.co.us City Profile, Housing Statistics, 4/16/2006.

www.ci.westminster.co.us Community Housing Service Programs, 4/16/2006.

www.ci.westminster.co.us Planning Fees, 4/16/2006.

www.ci.westminster.co.us Rental property Maintenance Inspection Program, 7/21/2006.

www.ci.westminster.co.us Residential Development and Tap Fees, 7/21/2006.

www.ci.westminster.co.us Senior housing, 7/21/2006.

www.co.adams.co.us Colorado Senior Property Tax Exemption, 7/14/2006.

www.co.adams.co.us Direct Service Programs, 7/8/2006.

www.co.adams.co.us Head Start History and Profile, Eligibility and Enrollment, 7/10/2006.

www.colohfa.org Finding the right mortgage program for you, 7/27/2006.

www.coloradobankers.org The New Colorado Foreclosure Act HB-06-1387.

www.coloradohousingassistance.org Colorado Housing Assistance, 7/27/2006.

www.coloradohousingtrustfund.org Colorado Housing Investment Fund Basics, Colorado Housing Wage Continues to be out of Reach, Economic Impacts on the State of Colorado, 7/27/2006.

www.coloradolegalservices.org Colorado Legal Services Case Types, Client Profiles, 2003 – 2005, 7/21/2006.

www.coworkforce.com Denver-Boulder-Greeley Consumer Price Indexes, 7/30/2006.

www.coworkforce.com Denver PMSA Wages By Occupational Group, 10/23/2006.

www.denbar.org The Denver Bar Association, Housing Discrimination, 7/26/2006.

www.denverpost.com Jackson, Margaret. Apartment vacancies dip as foreclosures climb, 04/28/2006.

www.denverpost.com Svaldi, Aldo. Home resale prices take dip, 06/02/2006.

www.dontborrowtroubleco.org Avoiding Borrowing Pitfalls, Housing Counseling Organizations as of July 2006, 7/24/2006.

www.dora.state.co.us Colorado Civil Rights Division. Civil and Human Rights Related Links, 6/28/2006.

www.dora.state.co.us Colorado Civil Rights Division. About the Commission, Colorado Process, Complaint Process, Summary of Colorado Statutes, 6/28/2006.

www.enterprisefoundation.org Enterprise in Denver: Celebrating 10 years, 7/26/2006.

www.factfinder.census.gov Adams County, Colorado Selected Economic Characteristics: 2005.

www.ffiec.gov Home Mortgage Disclosure Data, Denver-Aurora, CO 2004, 06/17/2005.

www.gpec.org Effective Buying Income, 7/31/2006.

www.hbadenver.com Home Builders Association of Metro Denver Philanthropy, Total Denver Metro Residential Building Permits Up Year to Date, 7/26/2006.

www.housingjustice.org Housing Justice: Community Initiatives, History and Accomplishments, Education, People's Walk, 4/12/2006.

www.hudcolorado.com CO Foreclosure Properties, Officers & Teachers Updated 7/12/06, 7/14/06.

www.icc.org Code Development: 2006/2007 Code Development Cycle – Proposed Code Changes, 7/16/2006.

www.learnfairhousing.org Colorado Coalition for the Homeless, What are Federal, State and Local Laws? 7/27/2006.

www.mapleton.us/schools School Locations for 2006 and Beyond, 7/5/2006.

www.metromayors.org Metro Mayors Caucus affordable and workforce housing, 7/23/2006.

www.mhhf.org Mile High Housing Fund Fact Sheet, Organizational Milestones, Services Overview, 4/9/2006.

www.northglenn.org Chapter 20, Registration of Non-Resident Residential Property Owners, 7/21/2006.

www.northglenn.org City of Northglenn Zoning Ordinance, 4/16/2006.

www.nmcommserv.com North Metro Community Services, 7/17/2006.

www.recolorado.com Disabled Home Buyers, Equal Housing Opportunity, Fair Housing, 7/26/2006.

www.rmmha.com Rocky Mountain Mutual Housing Association, Mountain Terrace Apartments, What Is Mutual Housing, 7/5/2006.

www.rockymountainnews.com John Rebchook. Foreclosure shock, March 29, 2006.

www.rtd-denver.com RTD Senior Ride, ECO Pass, 7/13/2006.

www.rtd-fastracks.com FASTRACKS Plans, East Corridor, North Metro Corridor, U. S. 36 Corridor/Longmont Extension, 7/5/2006.

www.thistlehousing.org Executive Summary 2005, Thistle Community Housing, Village by the Park, 5/1/2006.

www.usbank.com Community Relations, 7/27/2006.

www.valleybankandtrust.com Mortgage Products, 7/27/2006.

www.webapps.co.adams.co.us Adams County Public Trustee, New Foreclosures Report, 10/27/2006.

