



community**strategiesinstitute**

**Adams County Colorado
Analysis of Impediments to
Fair Housing Choice**

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The Community Strategies Institute was formed in 2003 to provide fiscal and economic analysis, education and training to individuals and groups wishing to better understand and improve the economic and social factors influencing affordable housing development, housing conditions and community infrastructure as those elements influence the economic mobility of low-income populations. The Institute Directors and Members have diverse backgrounds in housing development, finance, management, policy and research. The Institute can be your partner in designing research, programs, and investments for expanding opportunities for individuals to become economically stable members of caring communities.

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SECTION 1: EXECUTIVE SUMMARY

The 2015 Analysis of Impediments includes unincorporated Adams County and all jurisdictions in Adams County, Colorado, except Arvada, Aurora, Thornton and Westminster. The analysis includes a review of Adams County and local jurisdiction laws, regulations and policies followed by an analysis of how these policies might impact the location, availability and accessibility of housing. It also identifies lending practices and household economic conditions that affect housing choice, patterns of occupancy and location of public and government assisted housing, possible forms of discrimination and other factors impacting fair housing. Adams County is required to include a Five Year Housing Impediment Plan as part of its Five Year Consolidated Plan. Both plans are required by The Department of Housing and Urban Development (HUD) in order to receive Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), and Emergency Solutions Grant (ESG) funding. Adams County contracted with the Community Strategies Institute (CSI) to develop the updated plan.

CSI utilized its experience and knowledge regarding fair housing issues in writing this report. The following steps were taken to formulate the report:

- The Adams County 2007, “Analysis of Impediments to Fair Housing Choice” Report and report updates were examined and analyzed.
- Extensive research was conducted using various resources including the internet, newspaper articles, press releases, promotional material, County reports and other documents. County departments, public and private agencies and individuals were contacted for information and input.
- Electronic surveys were distributed to industry professionals to gain insight into real estate and lending practices.
- The draft document was presented to the Adams County Board of Commissioners.
- A draft was published for public comments and feedback, and any feedback was incorporated into the final document after 30 days. (No feedback was received.)
- A formal adoption hearing was scheduled and the AI was adopted.
- The final document was prepared for submittal to HUD.

The purpose of this report is to:

- Review the data and impediments identified in the previous report.
- Determine if the 2007 impediments still exist and if new impediments must be identified.
- Review actions taken and evaluate the effectiveness of the actions.
- Identify any new impediments and make recommendations on actions to address the impediments.

The actions suggested are intended to:

- Analyze and eliminate housing discrimination in the County.
- Promote fair housing choice for all persons.
- Provide opportunities for racially and ethnically inclusive patterns of housing occupancy.
- Encourage the construction of housing that is physically accessible to persons with disabilities.
- Facilitate community compliance with federal and state fair housing laws.

As a result of the research and analysis conducted for this report, CSI has restated possible barriers to fair housing choice in Adams County. Accompanying the listing of impediments to fair housing choice, are actions which Adams County proposes to undertake to ameliorate the identified impediments to fair housing choice.

2015 IMPEDIMENTS TO FAIR HOUSING CHOICE – ADAMS COUNTY

IMPEDIMENT 1: DEVELOPMENT RELATED FACTORS

Land costs and the associated costs of development including labor, materials and water acquisition costs continue to increase the cost of both multi-family and for-sale housing in the County and municipalities. Neighborhood and community opposition to new housing development, particularly multi-family development forces developers to devote more time and resources in responding to neighborhood concerns. The resistance to new development, known as NIMBYISM, often is not based on factors that a single property owner can control.

Action 1A: Adams County will work with County service providers and non-profit agencies to provide educational information and workshops to community organizations to help educate them on who needs affordable housing and how the challenges of development make housing more costly to front line workers, those with disabilities, the elderly, and those experiencing economic and medical challenges. (Ongoing)

Action 1B: Adams County Community Development (ACCD) will work with the Community and Economic Development Department, Adams County Housing Authority (ACHA) and municipal planning offices to identify parcels that have zoning in place to allow multi-family rental development. ACCD, in conjunction with ACHA, will maintain an inventory of potential sites and make the list available to developers seeking sites for multi-family housing projects. (Ongoing)

Action 1C: ACCD will cosponsor or promote, with other interested organizations Fair Housing events and trainings to educate both citizens and housing industry concerns on the benefits of having neighborhoods with a diverse housing stock. (Ongoing)

IMPEDIMENT 2: LACK OF DECENT HOUSING UNITS FOR LOW AND VERY LOW INCOME HOUSEHOLDS

Action 2A: The County has prioritized the creation of low and very low income rental housing units as a priority in its Consolidated Plan and Annual Action Plan. (2015-2016)

Action 2B: ACCD will work with affordable housing providers and developers to identify areas of opportunity for development of suitable sites for affordable housing complexes. (Annually)

Action 2C: The County will support affordable rental housing development proposals by investing HOME and CDBG funds in projects that are seeking match dollars from state and federal sources. (Annually)

Action 2D: ACCD will work with service agencies and special needs housing providers to expand the supply of affordable rental units and opportunities for those with special needs such as physical/mental disabilities, frail elderly, and homeless households and those households facing the threat of homelessness. (Annually)

Action 2E: ACCD will work with citizens groups, developers and the Adams County Development Services Division to address concerns relating to regulatory items that may contribute to increasing the cost of affordable housing development. (Ongoing)

IMPEDIMENT 3: A LACK OF RAPID REHOUSING OPTIONS AND TRANSITIONAL HOUSING

Action 3A: Adams County will continue to work with homeless service and housing providers to expand short term emergency housing options and transitional housing for formerly homeless individuals, Veterans and families. (Ongoing)

Action 3B: Adams County will provide support funding for homeless service agencies providing housing and support services to Adams County residents. (Ongoing)

Action 3C: Adams County will consider funding from both Federal and local resources to provide match and support for Adams County agency applications going to HUD under the Super-NOFA process administered through the Metro Denver Continuum of Care. (Annually)

IMPEDIMENT 4: LOCAL GOVERNMENT AND COUNTY REGULATIONS AND FEES CAN BE IMPEDIMENTS IF THOSE ITEMS LIMIT THE SUPPLY OF DECENT, AFFORDABLE HOUSING.

Action 4A: In situations where County fees are necessary, but still create economic impacts on affordable housing projects, the County will consider the use of County resources and Federal resources to lessen the fiscal impact of fees on development costs. (Annually)

Action 4B: ACCD will examine the regulatory and fiscal impact of County policies on the cost of affordable housing development. This examination will be incorporated into either an updated Balanced Housing Plan or a Housing Needs Assessment that outlines the approach the County will follow to encourage affordable housing development. (2017-2018)

Action 4C: ACCD will engage the municipalities within the County to achieve greater consistency of affordable housing policies and approaches that could potentially reduce the cost of affordable rental and starter home for-sale development. (2016-2017)

IMPEDIMENT 5: UNDERSTANDABLE FAIR HOUSING INFORMATION IS DIFFICULT TO OBTAIN FOR CONSUMERS, REALTORS®, LENDERS AND OTHER HOUSING PROVIDERS.

Action 5A: ACCD will promote and/or cosponsor Fair Housing Forums and workshops with other organizations to promulgate simple, clear information on Fair Housing Regulations and guidelines for expanding Fair Housing Choice. (Ongoing)

Action 5B: ACCD will maintain contact information for translation service organizations so that if housing providers have a need for translation service for a client or group of clients, the translation service can be obtained in a timely fashion. (Ongoing)

SECTION TWO: DATA COLLECTION AND ANALYSIS

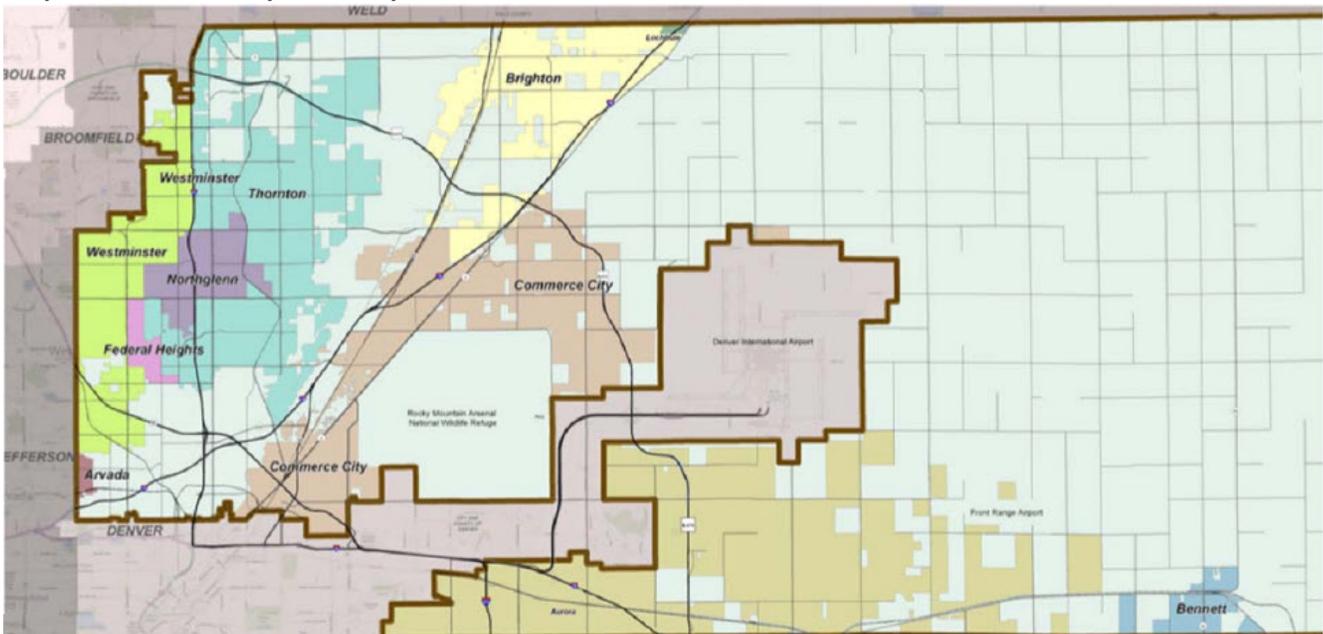
DEMOGRAPHICS

Adams County encompasses approximately 1,183.6 square miles. It extends 72 miles west to east, and 18 miles north to south (see Map 1). It is adjacent to Denver and is one of the five counties that make up the Denver metropolitan area. All of Colorado’s interstate highways (I-25, I-70, and I-76) and their associated loops (I-225, I-270) converge in Adams County. In addition, US Highways 36, 287, 6 and 85 also trek through the county. E-470 completes the connection from C-470 in the south, through Denver International Airport (DIA) and finally to I-25.

Adams County, which historically has been agricultural in nature, has undergone a development typical to counties in close proximity to a major metropolitan city. Urbanization has occurred most rapidly in the western part of the county, due to the proximity to the urban core of Denver. The eastern sections, with the exception of Bennett and Strasburg, are comprised mainly of farms, rangeland, and wide-open spaces. The Town of Bennett has experienced historic growth and has developed a strategic plan for growth.

Eight incorporated cities and two towns are wholly or partially located in Adams County, including the cities of include Arvada, Aurora, Brighton, Commerce City, Federal Heights, Northglenn, Thornton, and Westminster, and the towns of Bennett and Lochbuie. Adams County works in partnership with the Town of Bennett, and Cities of Brighton, Commerce City, Federal Heights, Northglenn, Thornton and Westminster. The Cities of Aurora, Arvada, Northglenn and Thornton complete their own Analysis of Impediments to Fair Housing. Adams County has a diverse mix of large, suburban communities, smaller towns, and rural farming communities that have an extensive range and mix of housing, commercial enterprises and public services.

Map 1: Adams County Boundary



POPULATION

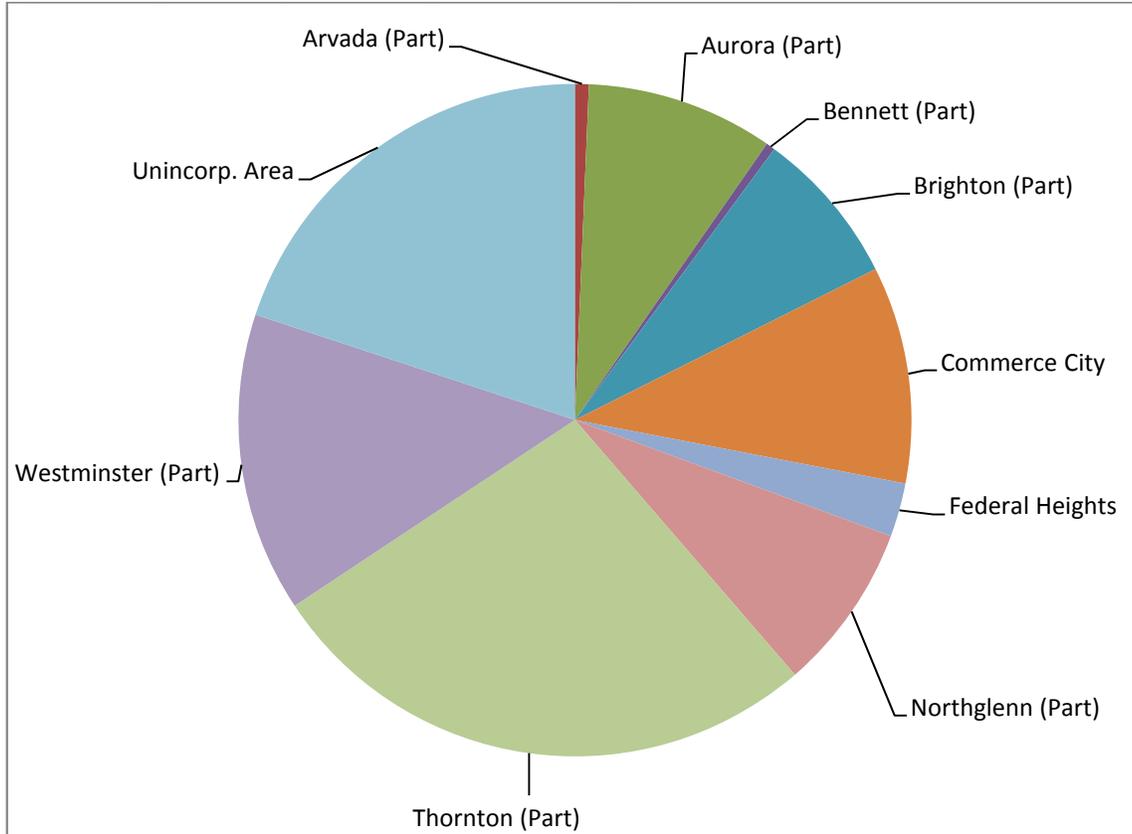
The population throughout Adams County is forecast to grow. According to the Denver Regional Council of Governments, Adams County will have a population of approximately 840,000 in 2035, the largest of any county in the metro Denver region. The jurisdictions with the largest populations are Thornton, Westminster, Commerce City, and Northglenn as depicted on Table 1 and Figure 1 (next page).

Table 1: Population in Adams County, 2000 - 2019

Area	2000	2010	2014	2019
Adams County	363,857	443,711	475,956	520,000
Arvada (Part)	2,847	2,861	3,095	3,381
Aurora (Part)	40,249	40,035	42,847	46,813
Bennett (Part)	20,121	1,964	2,096	2,290
Brighton (Part)	20,751	33,171	35,646	38,945
Commerce City (boundary has changed over time)	20,991	46,209	49,689	54,287
Federal Heights	12,065	11,517	12,316	13,456
Northglenn (Part)	31,563	35,932	38,359	41,908
Thornton (Part)	82,384	119,339	128,564	140,461
Westminster (Part)	57,419	63,981	68,515	74,855
Unincorp. Area	81,219	88,700	94,826	103,601

Source: US Census Bureau, Colorado Demography Office and CSI

Figure 1: Population by Community, Adams County, 2013



Source: Colorado Demography Office and CSI

POPULATION BY AGE

The Colorado State Demographer's Office provides a forecast of population by age. While the percentage of seniors in the total population will grow slightly, population increases are expected to remain proportional, for the most part, between 2011 and 2019. The total number of persons will grow in all age ranges is depicted in Table 2 and Figure 2 (next page).

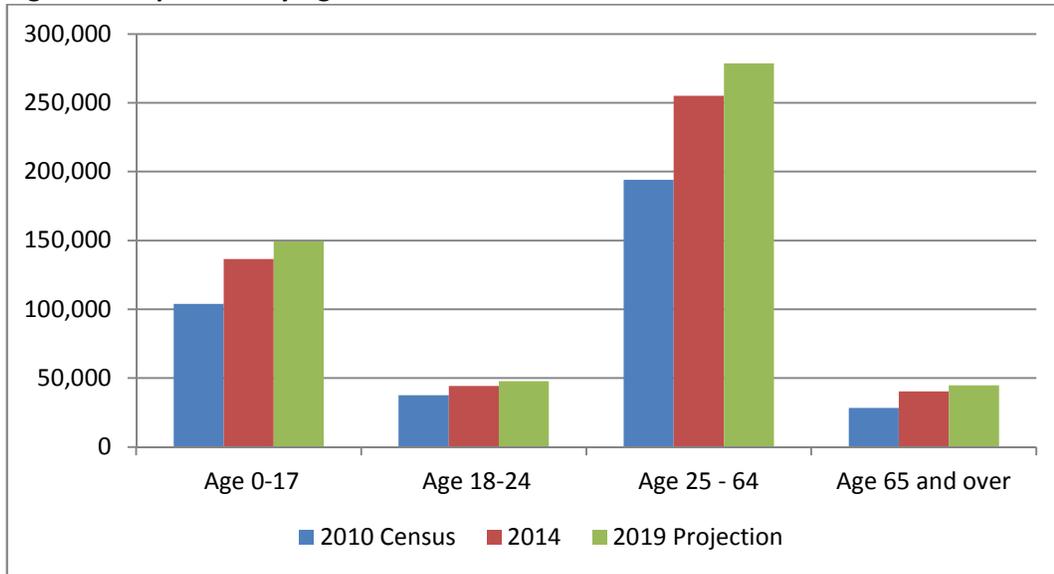
Table 2: Adams County Population by Age

Age Group	2010 Census		2011		2014		2019 Projection	
	Number	%	Number	%	Number	%	Number	%
Population Age 0-17	103,956	28.6%	124,116	28.6%	136,599	28.7%	149,240	28.7%
Population Age 18-24	37,470	10.3%	40,685	9.4%	44,264	9.3%	47,840	9.2%
Population Age 25 - 64	194,049	53.3%	233,558	53.8%	255,112	53.6%	278,710	53.6%
Population Age 65 and over	28,382	7.8%	35,936	8.3%	40,456	8.5%	44,710	8.5%
Total	363,857		434,295		475,956		520,000	

Sources: US Census Bureau (2000, 2010 and 2007-2011); Colorado Demographer's Office; CSI

In 2014, there were over 40,000 people age 65 and over in Adams County. The number of seniors is low, however, compared to the number of children, younger adults and those approaching retirement.

Figure 2: Population by Age



Sources: US Census Bureau (2000, 2010 and 2007-2011); Colorado Demographer's Office; CSI

POPULATION BY RACE, ETHNICITY, AND LIMITED ENGLISH PROFICIENCY

The majority of the population in Adams County is white, according to the US Census Bureau American Community Survey (ACS). Those who identify themselves as Hispanic or Latino make up 38.2% of the total population. Adams County has the highest percentage of Hispanic or Latino population throughout the Metro Denver area. Just over three percent (3.2%) of the population is African American and another 3.7% are Asian.

Table 3: Population by Race and Ethnicity, Adams County, 2013

	Number	Percent
White	363,206	80.3%
Black or African American	14,314	3.2%
American Indian and Alaska Native	4,548	1.0%
Asian	16,853	3.7%
Native Hawaiian and Other Pacific Islander	549	0.1%
Some other race	36,219	8.0%
Two or more races	16,341	3.6%
Total population	452,030	
Hispanic or Latino (of any race)	172,472	38.2%

Source: US Census American Community Survey and CSI

Aurora (Adams County portion), Arvada (Adams County portion), and Commerce City have the highest minority concentrations in Adams County. Aurora (Adams County portion), Federal Heights, Commerce City and unincorporated Adams County have the highest percentage of Hispanics or Latinos.

Table 4: Population by Race and Ethnicity, Adams County and Cities, 2013

	White	Black or African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Some other race	Two or more races	Hispanic or Latino (of any race)
Adams County	80.3%	3.2%	1.0%	3.7%	0.1%	8.0%	3.6%	38.2%
Arvada (part)	72.6%	0.4%	0.6%	9.7%	0.0%	13.6%	3.0%	29.0%
Aurora (part)	61.6%	16.9%	1.5%	4.7%	0.2%	10.7%	4.4%	51.6%
Bennett (part)	93.8%	0.3%	2.1%	0.3%	0.0%	2.1%	1.3%	10.2%
Brighton (part)	81.3%	1.5%	1.1%	1.3%	0.0%	10.6%	4.3%	43.3%
Commerce City	76.2%	3.3%	1.2%	2.9%	0.4%	11.5%	4.6%	45.6%
Federal Heights	79.7%	1.3%	1.5%	4.9%	0.1%	8.8%	3.5%	50.8%
Northglenn	86.2%	1.7%	1.0%	3.5%	0.2%	4.4%	3.0%	32.1%
Thornton	83.2%	1.7%	0.7%	4.9%	0.1%	6.4%	3.0%	31.2%
Westminster (part)	83.1%	1.9%	0.4%	5.5%	0.0%	5.4%	3.7%	26.4%
Unincorporated	82.6%	1.3%	1.5%	1.6%	0.1%	9.4%	3.5%	45.7%

Source: US Census American Community Survey and CSI

Just under 15% of Adams County’s population is foreign born as seen in Table 5. Aurora, Thornton, Arvada, and unincorporated Adams County have the highest percentages of foreign born residents.

Table 5: Place of Birth, 2013

	Total	Native	Foreign Born			
			Total	Naturalized U.S. citizen	Not a U.S. citizen	Percent Foreign Born
Adams County	452,030	384,839	67,191	19,969	47,222	14.9%
Arvada (part)	2,941	2,424	517	261	256	17.6%
Aurora (part)	41,049	28,153	12,896	2,162	10,734	31.4%
Bennett (part)	1,640	1,600	40	34	6	2.4%
Brighton (part)	33,655	28,881	4,774	1,016	3,758	14.2%
Commerce City	121,814	108,195	13,619	5,567	8,052	11.2%
Federal Heights	65,128	57,239	7,889	2,991	4,898	12.1%
Northglenn	47,239	39,937	7,302	2,266	5,036	15.5%
Thornton	11,654	9,013	2,641	592	2,049	22.7%
Westminster (part)	36,471	33,193	3,278	1,102	2,176	9.0%
Unincorporated	90,439	76,204	14,235	3,978	10,257	15.7%

Source: US Census American Community Survey and CSI

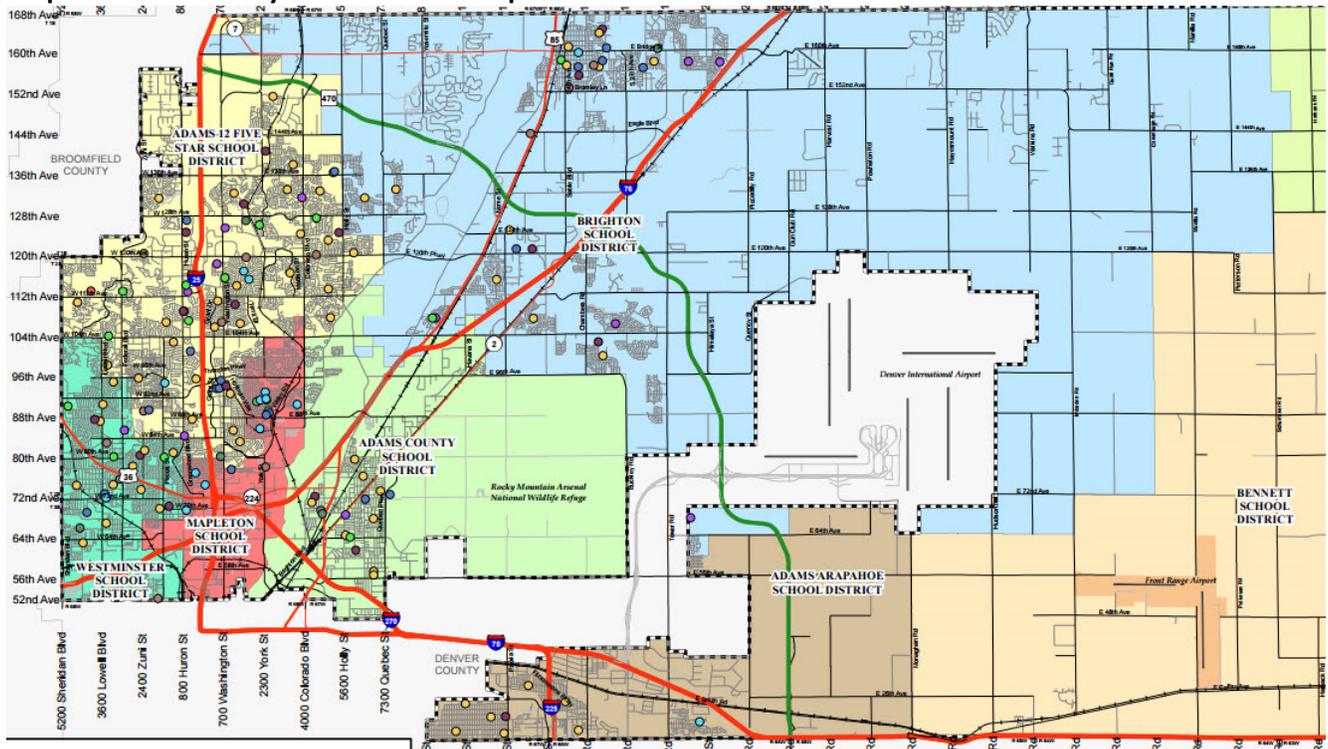
Table 6: School District Enrollment by Race and Ethnicity, 2013

	American Indian or Alaskan Native	Asian	Black or African American	White	Native Hawaiian or Other Pacific Islander	Two or More Races	Hispanic or Latino	Total Pupil Count	Total Minority Count	%
Mapleton 1	70	110	166	2,644	11	267	5,140	8,408	5,764	68.6%
Adams 12 Star	330	2,214	944	22,958	62	814	14,908	42,230	19,272	45.6%
Adams County 14	44	16	187	1,000	2	60	6,289	7,598	6,598	86.8%
Brighton 27J	78	424	277	8,094	18	463	7,344	16,698	8,604	51.5%
Bennett 29J	11	4	6	749	0	34	209	1,013	264	26.1%
Strasburg 31J	8	11	9	905	2	11	126	1,072	167	15.6%
Westminster 50	62	510	128	1,791	9	183	7,418	10,101	8,310	82.3%

Source: Colorado Department of Education, CSI

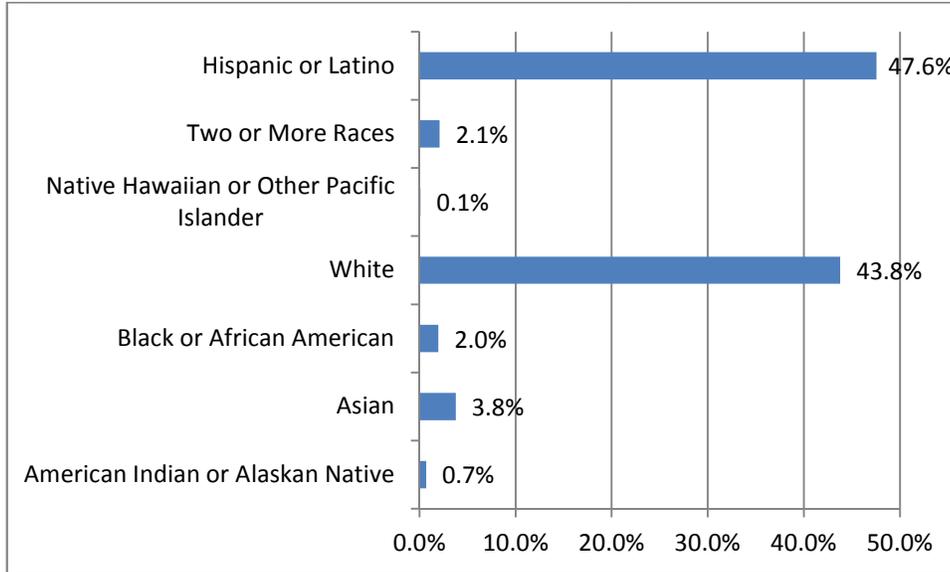
School enrollment for the school districts that serve Adams County shows that almost half of children are Hispanic or Latino, 17.5% are African American, 8.4% are Asian and many others identify themselves as a minority or mixed race.

Map 2: Adams County School District Map



Source: Adams County GIS

Figure 3: 2013 School Enrollment for Adams County School Districts



Source: Colorado Department of Education, CSI

Table 7 shows that in Adams County, just over 12% of people age five and older speak a language other than English as their primary language. For those who speak another language, the most common language spoken is Spanish, followed by Asian and Pacific Island languages.

Table 7: 2013 Language Spoken for Population Age 5 and Up

	Total	Percent of specified language speakers	
		Speak English "very well"	Speak English less than "very well"
Population 5 years and over	422,929	87.60%	12.40%
Speak only English	71.50%		
Speak a language other than English	28.50%	56.70%	43.30%
Spanish or Spanish Creole	23.10%	56.40%	43.60%
Other Indo-European languages	1.90%	71.30%	28.70%
Asian and Pacific Island languages	2.90%	47.90%	52.10%
Other languages	0.70%	64.90%	35.10%

Source: US Census American Community Survey and CSI

As table 8 shows, the percentage of English Language learners in each Adams County school district varies greatly, with rural districts having very few English Language learners. Adams County 14, Westminster 50 and Mapleton 1 have a high percentage of students who are learning English as a second language.

Table 8: English Language Learners, Adams County School Districts

District Name	Total Enrolled Students	English Lang Learner	%
Mapleton 1	8,408	2,592	30.8%
Adams 12 Star	42,230	7,262	17.2%
Adams County 14	7,598	3,216	42.3%
Brighton 27J	16,698	2,391	14.3%
Bennett 29J	1,013	75	7.4%
Strasburg 31J	1,072	43	4.0%
Westminster 50	10,101	3,983	39.4%

Source: Colorado Department of Education, CSI

POPULATION WITH DISABILITIES

The ACS collects data related to disability status. In 2013, as Table 9 shows, Adams County showed that 11% of its population had a disability (compared to 10% throughout Colorado). Persons may have more than one self-reported disability. The most common disabilities were ambulatory, hearing and independent living difficulties. These disabilities can all require service enriched or modified housing units.

Table 9: Disability Status

Subject	Adams County		
	Total	With a disability	Percent with a disability
Total civilian noninstitutionalized population	465,748	51,192	11.00%
Population under 5 years	36,715	212	0.60%
With a hearing difficulty	(X)	148	0.40%
With a vision difficulty	(X)	64	0.20%
Population 5 to 17 years	94,327	6,005	6.40%
With a hearing difficulty	(X)	683	0.70%
With a vision difficulty	(X)	1,769	1.90%
With a cognitive difficulty	(X)	3,857	4.10%
With an ambulatory difficulty	(X)	1,257	1.30%
With a self-care difficulty	(X)	1,006	1.10%
Population 18 to 64 years	291,865	28,669	9.80%
With a hearing difficulty	(X)	7,325	2.50%
With a vision difficulty	(X)	6,935	2.40%
With a cognitive difficulty	(X)	10,592	3.60%
With an ambulatory difficulty	(X)	13,531	4.60%
With a self-care difficulty	(X)	5,216	1.80%
With an independent living difficulty	(X)	8,613	3.00%
Population 65 years and over	42,841	16,306	38.10%
With a hearing difficulty	(X)	8,367	19.50%
With a vision difficulty	(X)	3,192	7.50%
With a cognitive difficulty	(X)	2,938	6.90%
With an ambulatory difficulty	(X)	10,488	24.50%
With a self-care difficulty	(X)	4,011	9.40%
With an independent living difficulty	(X)	6,747	15.70%

Source: US Census American Community Survey 2013

The percent of the population with disabilities increases as the population ages. For persons age five and under, the two disabilities that are tabulated are hearing and vision disabilities. For persons age 65 and older, 38.1% have one of the disabilities listed above. As seniors age, the frequency of ambulatory, self-care and independent living disabilities increases greatly.

HOUSEHOLDS

As Adams County’s population has grown, so has the number of households within the county, as Table 10 shows. The following table shows the number of households in Adams County. Household numbers continued to grow through the last decade, despite the economic downturn, as Table 10 shows.

Table 10: Households in Adams County, 2000 - 2011

	2000	2010	Av Annual Change 2000-10	2014	Av Annual Change 2010-14	2019	Av Annual Change 2014-19
Owner-occupied housing units	90,436	101,041	1.2%	107,583	1.6%	116,259	1.6%
Renter-occupied housing units	37,720	52,723	4.0%	55,874	1.5%	59,970	1.5%
Total households	128,156	153,764	2.0%	163,457	1.6%	176,229	1.6%

Sources: 2000 Census, 2010 Census, Colorado State Demographer’s Office, Claritas Data

Table 11 shows that of the 152,803 estimated households in Adams County, the majority live in Thornton, Westminster, and unincorporated Adams County.

Table 11: Households by Municipality, Adams County, 2013

	Households
Adams County	152,803
Arvada (part)	1,124
Aurora (part)	12,720
Bennett (part)	663
Brighton (part)	10,175
Westminster (part)	25,087
Commerce City	14,580
Federal Heights	4,363
Northglenn	13,403
Thornton	40,954
Unincorporated Adams County	29,734

Source: US Census American Community Survey and CSI

HUD estimates households by type for the Consolidated Plan. The following table shows these types and estimates the total number and percent of all households by type in 2011. By far, the most common household type was small family households, those with two to four family members. Large related households have five or more related household members and made up 11.8% of Adams County households in 2011.

Table 12: Household Type, Adams County 2011

	Percent of Total	Total Number
Total Households		150,373
Small Family Households	50.6%	76,078
Large Family Households	11.8%	17,679
Household contains at least one person 62-74 years of age	13.4%	20,094
Household contains at least one person age 75 or older	6.8%	10,225
Households with one or more children 6 years old or younger	20.4%	30,728

Source: CHAS Data, 2011 US Census American Community Survey, CSI

HOUSEHOLD INCOMES

In Adams County, 29%, or 44,626, households have incomes below \$35,000 a year. Another 37%, or 56,761, have incomes between \$35,000 and \$75,000 per year, and 34%, or 53,013, have incomes that are higher than \$75,000 per year, as shown in Table 13.

Table 13: Household Incomes in Adams County, 2013

Household Income	Owner occupied	Renter occupied	Total
Less than \$5,000	1,282	2,254	3,536
\$5,000 to \$9,999	1,035	3,761	4,796
\$10,000 to \$14,999	2,490	3,591	6,081
\$15,000 to \$19,999	2,535	3,324	5,859
\$20,000 to \$24,999	3,405	4,782	8,187
\$25,000 to \$34,999	8,296	7,871	16,167
\$35,000 to \$49,999	12,897	10,761	23,658
\$50,000 to \$74,999	23,163	9,940	33,103
\$75,000 to \$99,999	17,324	4,807	22,131
\$100,000 to \$149,999	18,421	2,703	21,124
\$150,000 or more	8,971	787	9,758
Total:	99,819	54,581	154,400
Median Household Income	\$68,483	\$37,076	\$55,223

Source: US Census American Community Survey and CSI

Table 14 shows that the median income in Adams County was \$55,223 in 2013. The median owner income was just under \$68,500, and the median renter income was just over \$37,000. Westminster, Federal Heights, Arvada and Brighton had the highest median incomes.

Table 14: Median Household Incomes in Adams County and Municipalities, by Tenure, 2013

	Median Income All Households	Owner occupied (dollars)	Renter occupied (dollars)
Adams County	\$56,270	\$70,279	\$36,908
Arvada (part)	\$62,870	\$59,236	\$68,882
Aurora (part)	\$39,196	\$51,340	\$26,548
Bennett (part)	\$42,107	\$44,750	\$40,052
Brighton (part)	\$62,441	\$72,849	\$40,437
Commerce City	\$60,857	\$77,154	\$39,767
Federal Heights	\$63,555	\$76,210	\$34,183
Northglenn	\$36,998	\$40,402	\$32,413
Thornton	\$52,886	\$68,130	\$33,887
Westminster (part)	\$64,525	\$79,329	\$41,804

Source: US Census American Community Survey and CSI

The following table breaks down the number of households in Adams County by HUD AMI level and tenure. As is true in all communities, owners are concentrated in higher income categories, and most renters are in lower income categories. Over 50% of renters in Adams County have incomes at or below 50% of the AMI.

Table 15: Households by AMI and Tenure, 2013

Pct of 2013 AMI	Lower end of income range	Upper end of income range	Owner- occupied Households	Renter- occupied Households	Total Households
0-30%	\$0	\$23,010	9,392	15,809	25,201
31-50%	\$23,011	\$38,350	12,531	12,177	24,708
51-60%	\$38,351	\$46,020	6,595	5,503	12,098
61-80%	\$46,021	\$61,360	13,947	7,372	21,319
81-100%	\$61,361	\$76,700	13,815	5,750	19,565
100-120%	\$76,701	\$92,040	10,630	2,950	13,580
Over 120%	\$92,041		32,907	5,020	37,928
Total			99,819	54,581	154,400

Source: US Census American Community Survey and CSI

FAMILIES IN POVERTY

Fewer owner occupied households in Adams County live in poverty, according to the American Community Survey. The following chart shows the poverty level by household size for Adams County.

Table 16: Poverty Level by Households Size, Adams County, 2015

Persons in Family	Poverty Guidelines
1	\$11,770
2	\$15,930
3	\$20,090
4	\$24,250
5	\$28,410
6	\$32,570
7	\$36,730
8	\$40,890

Source: US Census American Community Survey and CSI

Aurora households have the highest poverty rate of all incorporated areas in Adams County, followed by Federal Heights and Northglenn, as shown in Table 17.

Table 17: Households in Poverty by Tenure, 2013

	Total	Income in the past 12 months below poverty level	Percent Living Below Poverty Level
Adams County	447,014	63,540	14.2%
Arvada (part)	2,937	126	4.3%
Aurora (part)	40,722	12,196	29.9%
Bennett (part)	1,632	184	11.3%
Brighton (part)	31,901	2,613	8.2%
Commerce City	64,553	8,720	13.5%
Federal Heights	46,975	8,325	17.7%
Northglenn	11,604	2,023	17.4%
Thornton	36,155	5,443	15.1%
Westminster (part)	120,628	11,369	9.4%

Source: US Census American Community Survey and CSI

The US Census provides a breakdown of households in poverty by age, race and ethnicity, educational attainment and employment status. Adams County residents under the age of 65 have higher incidences of poverty than those 65 and older. African Americans and residents of some other race have the highest incidence of poverty of all races. Data is suppressed for Native Hawaiian and other Pacific Islanders due to the small sample size for these populations. Approximately twenty-two percent (22.9%) of those of Hispanic or Latino ethnic origin live below the poverty level.

Table 18: Poverty Statistics, Adams County, 2013

	Population for whom poverty status is determined	Percent below poverty level
Population for whom poverty status is determined	455,200	14.9%
AGE		
Under 18 years	127,794	21.1%
Related children under 18 years	127,259	20.8%
18 to 64 years	286,967	13.0%
65 years and over	40,439	9.2%
SEX		
Male	228,088	13.7%
Female	227,112	16.2%
RACE AND HISPANIC OR LATINO ORIGIN		
White	375,961	13.5%
Black or African American	14,306	32.6%
American Indian and Alaska Native	3,730	15.4%
Asian	17,433	12.6%
Native Hawaiian and Other Pacific Islander		N
Some other race	26,819	27.5%
Two or more races	16,441	15.6%
Hispanic or Latino origin (of any race)	174,605	22.9%
White alone, not Hispanic or Latino	239,368	8.5%

Source: US Census American Community Survey and CSI

ECONOMY AND LOCAL EMPLOYMENT

Adams County's labor force has grown annually through the past decade, as has the number of employed persons in Adams County. Most recent 2014 Colorado Labor and Employment data shows a total number of jobs in Adams County of just over 175,400. The Colorado Department of Labor and Employment reported that in November of 2014, there were 239,789 persons in the Adams County labor force, and 10,458 unemployed persons in the county. In November, the Adams County unemployment rate was 4.4%, just slightly higher than the statewide unemployment rate of 4.0%.

Table 19: Labor Force Information, Adams County, 1990 - 2013

Time Period	Labor Force	Employed	Unemployed	Unemployment Rate
1990	144,431	136,389	8,042	5.6%
2000	187,163	181,994	5,169	2.8%
2010	231,305	207,552	23,753	10.3%
2011	232,271	209,106	23,165	10.0%
2012	234,939	213,716	21,223	9.0%
2013	236,377	218,548	17,829	7.5%

Source: US Census American Community Survey

The industries with highest employment in Adams County are healthcare and social services, educational services, retail trade, and construction. The highest growth industries are healthcare and social assistance, educational services, retail trade, construction, and transportation and warehousing.

Table 20: Employment by Industry, Adams County 2005-2014

Industry	2005	2010	Quarter 1 2014	Change 2005-2014
Total, All Industries	147,673	147,987	175,442	18.8%
Accommodation and Food Services	10,947	12,011	13,561	23.9%
Administrative and Waste Services	9,484	9,574	9,907	4.5%
Agriculture, Forestry, Fishing & Hunting	1,143	893	1,022	-10.6%
Arts, Entertainment, and Recreation	1,594	1,349	1,332	-16.4%
Construction	18,001	13,781	17,569	-2.4%
Educational Services	11,833	13,492	20,665	74.6%
Finance and Insurance	2,924	2,674	2,999	2.6%
Health Care and Social Assistance	9,533	15,889	22,971	141.0%
Information	2,063	2,101	2,621	27.0%
Management of Companies and Enterprises	1,406	1,653	1,338	-4.8%
Manufacturing	14,026	10,739	12,583	-10.3%
Mining	236	272	594	151.7%
Other Services, Ex. Public Admin	4,652	4,459	4,942	6.2%
Professional and Technical Services	3,952	4,880	5,348	35.3%
Public Administration	6,833	7,385	7,135	4.4%
Real Estate and Rental and Leasing	2,843	2,612	2,678	-5.8%
Retail Trade	15,980	16,752	18,401	15.2%
Transportation and Warehousing	15,566	13,476	14,367	-7.7%
Unclassified	4	10	34	750.0%
Utilities	1,036	776	767	-26.0%
Wholesale Trade	13,622	13,210	14,607	7.2%

Source: US Census American Community Survey

Adams County has the tenth highest wages of all Colorado counties. Wages fall below other metro Denver counties including Broomfield, Denver, Arapahoe, Jefferson and Boulder Counties, as shown in Table 21 below.

Table 21: Average Wages Ranking in Colorado, 3rd Quarter 2014

Rank	Area Name	Total Average Employment	Average Hourly Wage	Average Weekly Wage	Average Annual Wage
1	Broomfield County	34,927	\$32.20	\$1,288	\$66,976
2	Denver County	465,856	\$29.40	\$1,176	\$61,152
3	Boulder County	169,758	\$28.15	\$1,126	\$58,552
4	Arapahoe County	308,004	\$27.40	\$1,096	\$56,992
5	Douglas County	108,990	\$25.93	\$1,037	\$53,924
6	Rio Blanco County	3,221	\$25.30	\$1,012	\$52,624
7	Dolores County	850	\$23.83	\$953	\$49,556
8	Jefferson County	224,155	\$23.78	\$951	\$49,452
9	Clear Creek County	3,113	\$23.15	\$926	\$48,152
10	Adams County	185,697	\$23.13	\$925	\$48,100

Source: Colorado Department of Labor and Employment, assumes 40 hour work week

The following table shows average hourly and annual wages by industry in Adams County in the first quarter of 2014. The industries with the highest wages were mining, management of companies and enterprises, utilities, and information. Some of these industries are growing in Adams County, but others, like management of companies and enterprises and utilities, have declined from 2005 to 2014.

Table 22: Average Wages by Industry in Adams County, 1st Quarter 2014

Industry	Average Employment	Average Weekly Wage	Average Annual Wage
Total, All Industries	175,442	\$914	\$47,528
Accommodation and Food Services	13,561	\$319	\$16,588
Administrative and Waste Services	9,907	\$637	\$33,124
Agriculture, Forestry, Fishing & Hunting	1,022	\$377	\$19,604
Arts, Entertainment, and Recreation	1,332	\$415	\$21,580
Construction	17,569	\$945	\$49,140
Educational Services	20,665	\$1,078	\$56,056
Finance and Insurance	2,999	\$997	\$51,844
Health Care and Social Assistance	22,971	\$966	\$50,232
Information	2,621	\$1,490	\$77,480
Management of Companies and Enterprises	1,338	\$1,729	\$89,908
Manufacturing	12,583	\$1,143	\$59,436
Mining	594	\$1,763	\$91,676
Other Services, Ex. Public Admin	4,942	\$736	\$38,272
Professional and Technical Services	5,348	\$1,258	\$65,416
Public Administration	7,135	\$1,134	\$58,968
Real Estate and Rental and Leasing	2,678	\$780	\$40,560
Retail Trade	18,401	\$564	\$29,328
Transportation and Warehousing	14,367	\$885	\$46,020
Unclassified	34	\$1,024	\$53,248
Utilities	767	\$1,606	\$83,512
Wholesale Trade	14,607	\$1,247	\$64,844

Source: Colorado Department of Labor and Employment, assumes 40 hour work week

The unemployment rate in Adams County has been slowly declining for the past few years, and the number of total jobs has been on the rise. There are still many residents of Adams County who have not found a job, though the number of unemployed persons has been declining.

HOUSING MARKET PROFILE

MARKET OVERVIEW

Since the last Analysis of Impediments to Fair Housing Choice for Adams County in 2007, the county housing market has heated up. Historic rental market information is available from the Apartment Association of Metro Denver. Low vacancy rates and rising rents are placing additional cost and access burdens on low income renters. Foreclosures are declining as home prices rise due to pent up demand and low interest rates. Low and moderate income households are becoming priced out of some sub-markets within Adams County where they previously could afford a home.

In Adams County, 65.6% of all housing units are owner occupied and 34.4% are renter occupied. Owner occupancy rates range from 51.5% in Federal Heights, to 83.5% in Arvada.

Table 23: Housing Units by Tenure, Adams County, 2013

	Total	Owner occupied	% of Total	Renter occupied	% of Total
Adams County	152,803	100,221	65.6%	52,582	34.4%
Arvada (part)	1,124	939	83.5%	185	16.5%
Aurora (part)	12,720	6,187	48.6%	6,533	51.4%
Bennett (part)	663	446	67.3%	217	32.7%
Brighton (part)	10,175	6,948	68.3%	3,227	31.7%
Westminster (part)	25,087	15,199	60.6%	9,888	39.4%
Commerce City	14,580	10,616	72.8%	3,964	27.2%
Federal Heights	4,363	2,246	51.5%	2,117	48.5%
Northglenn	13,403	7,773	58.0%	5,630	42.0%
Thornton	40,954	28,784	70.3%	12,170	29.7%

Source: US Census Bureau, American Community Survey

Approximately sixty-four percent (63.6%) of housing units in Adams County are single family detached units, as shown in Table 24. Owner occupied units are 82.5% single family homes, while 28.8% of rentals are single family homes. Renters are much more likely than owners to live in properties with more than five units.

Table 24: Units in Structure by Tenure, 2013

Units in Structure	Owner-occupied housing units		Renter-occupied housing units		Total occupied units	
	Number	Percent	Number	Percent	Number	Percent
1, detached	82,390	82.5%	15,735	28.8%	98,125	63.6%
1, attached	6,649	6.7%	4,414	8.1%	11,063	7.2%
2	274	0.3%	1,410	2.6%	1,684	1.1%
3 or 4	868	0.9%	3,412	6.3%	4,280	2.8%
5 to 9	1,484	1.5%	5,463	10.0%	6,947	4.5%
10 to 19	593	0.6%	10,330	18.9%	10,923	7.1%
20 to 49	342	0.3%	7,257	13.3%	7,599	4.9%
50 or more	61	0.1%	3,886	7.1%	3,947	2.6%
Mobile home	7,096	7.1%	2,631	4.8%	9,727	6.3%
Boat, RV, van, etc.	62	0.1%	43	0.1%	105	0.1%
Total:	99,819		54,581		154,400	

Source: US Census Bureau, American Community Survey

The following table shows the median age of housing units within each Adams County jurisdiction. Northglenn has some of the oldest housing stock in the County, while Thornton and Commerce City have some of the newest housing stock.

Table 25: Median Year Units Built, 2013

	Median year structure built
Adams County	1983
Arvada (part)	1981
Aurora (part)	1970
Bennett (part)	1980
Brighton (part)	1994
Commerce City	2001
Federal Heights	1985
Northglenn	1970
Thornton	1992
Westminster (part)	1984

Source: US Census Bureau, American Community Survey

Most housing units in Adams County have two, three or four bedrooms, as shown in Table 26. Renters are more likely to live in smaller units, while most units with four or more bedrooms are owner occupied.

Table 26: Units by Bedroom Size, 2013

Bedrooms	Owner occupied		Renter occupied		Total	
	Number	Percent	Number	Percent	Number	Percent
No bedroom	295	0.3%	1,003	1.8%	1,298	0.8%
1 bedroom	1,360	1.4%	14,466	26.5%	15,826	10.3%
2 bedrooms	16,035	16.1%	20,543	37.6%	36,578	23.7%
3 bedrooms	47,947	48.0%	12,386	22.7%	60,333	39.1%
4 bedrooms	26,624	26.7%	4,177	7.7%	30,801	19.9%
5 or more bedrooms	7,558	7.6%	2,006	3.7%	9,564	6.2%
Total	99,819		54,581		154,400	

Source: US Census Bureau, American Community Survey

RENT PROFILE

The Apartment Association of Metro Denver conducts a quarterly rent and vacancy survey that includes Adams County and county subdivisions. The following table presents the vacancy rates and average rents throughout the county during the 3rd quarter of 2014. Vacancy rates are extremely low, indicating a tight rental market. Throughout Adams County, the vacancy rate was 3.9%, below the 5% level considered market equilibrium. The average rent was \$795. Vacancy rates in Adams County are running as low as 2.3% in Aurora North market area, and average rents range from \$703 in Aurora North to \$1,157 in Commerce City. (please see chart below).

Table 27: Rents and Vacancies in Adams County, 3rd Quarter 2014

	Vacancy Rate	Average Rent
Adams County	3.9%	\$795
Aurora - North	2.3%	\$703
Commerce City	3.5%	\$1,157
Northglenn/Thornton	4.2%	\$1,101
Westminster	3.6%	\$1,024

Source: Apartment Association of Metro Denver Rent and Vacancy Survey, 3rd Quarter 2014

Efficiency and one bedroom rents are most affordable in Adams County. Rents have been on the rise for all unit sizes.

Table 28: Average Rents by Bedroom Size Over Time, 3rd Quarter 2014

	2013	2014		
	4th	1st	2nd	3rd
Aurora-North				
Efficiency	\$608.81	\$872.50	\$630.00	\$605.67
1 Bed	\$706.80	\$939.17	\$741.34	\$673.60
2 Bed, 1 Bath	\$835.99	\$894.00	\$852.03	\$832.69
2 Bed, 2 Bath	\$910.00	\$1,290.65		
3 Bed		\$1,581.14		
All	\$750.61	\$997.84	\$780.73	\$703.23
Commerce City/Brighton				
Efficiency	\$475.00	\$500.00	\$500.00	\$500.00
1 Bed	\$704.24	\$845.05	\$850.19	\$989.15
2 Bed, 1 Bath	\$870.40	\$952.87	\$974.88	\$1,100.78
2 Bed, 2 Bath	\$956.82	\$1,130.59	\$1,203.24	\$1,326.49
3 Bed	\$1,003.85	\$1,387.77	\$1,450.56	\$1,515.43
All	\$819.03	\$981.97	\$1,013.19	\$1,157.28
Northglenn/Thornton				
Efficiency	\$779.16	\$742.11	\$761.81	\$710.46
1 Bed	\$875.64	\$885.86	\$956.50	\$964.13
2 Bed, 1 Bath	\$997.47	\$1,022.14	\$1,029.05	\$1,046.52
2 Bed, 2 Bath	\$1,172.34	\$1,205.82	\$1,262.13	\$1,279.06
3 Bed	\$1,314.13	\$1,396.73	\$1,443.46	\$1,413.52
All	\$1,019.27	\$1,045.08	\$1,101.40	\$1,101.00
Westminster				
Efficiency	\$750.31	\$766.52	\$658.48	\$625.85
1 Bed	\$787.14	\$820.03	\$834.76	\$887.62
2 Bed, 1 Bath	\$895.44	\$917.54	\$934.45	\$1,005.15
2 Bed, 2 Bath	\$1,075.94	\$1,114.10	\$1,192.70	\$1,235.62
3 Bed	\$1,189.92	\$1,400.63	\$1,368.28	\$1,555.53
All	\$887.56	\$924.89	\$945.16	\$1,024.79
Adams County				
Efficiency	\$730.12	\$793.18	\$665.08	\$634.23
1 Bed	\$825.68	\$858.89	\$891.45	\$927.93
2 Bed, 1 Bath	\$931.98	\$957.70	\$973.75	\$1,025.65
2 Bed, 2 Bath	\$1,129.35	\$1,170.24	\$1,234.15	\$1,265.21
3 Bed	\$1,282.23	\$1,402.53	\$1,427.92	\$1,476.72
All	\$948.68	\$988.48	\$1,024.07	\$1,066.70

Source: Apartment Association of Metro Denver Rent and Vacancy Survey, 3rd Quarter 2014

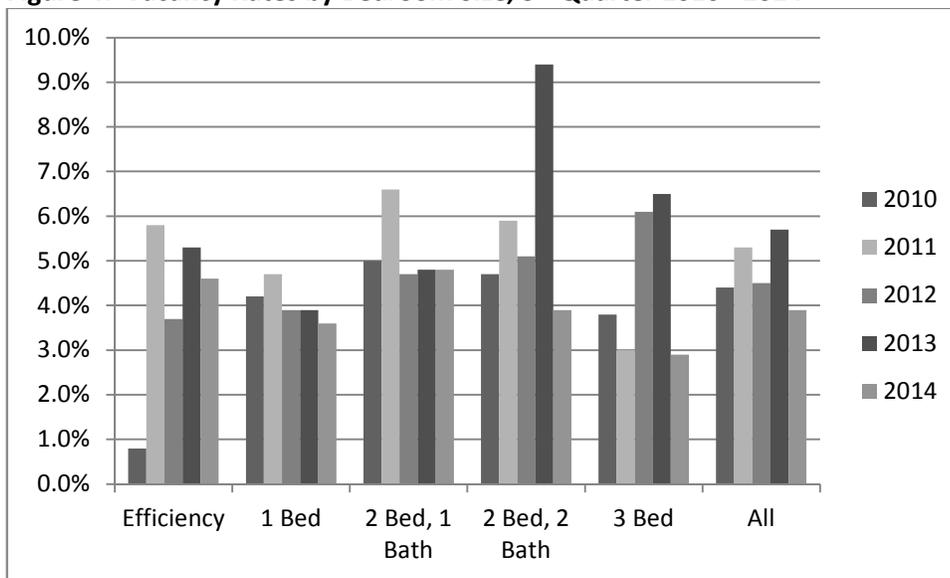
Vacancy rates in Adams County are lowest for larger units, and highest for efficiency units, as shown in Table 29 and Figure 4. Vacancy rates have declined significantly during the past five years, as demand for rentals has outpaced rental construction throughout the metro Denver area.

Table 29: Vacancy Rates by Bedroom Size, 3rd Quarter 2010-2014

	2010	2011	2012	2013	2014
Efficiency	0.8%	5.8%	3.7%	5.3%	4.6%
1 Bed	4.2%	4.7%	3.9%	3.9%	3.6%
2 Bed, 1 Bath	5.0%	6.6%	4.7%	4.8%	4.8%
2 Bed, 2 Bath	4.7%	5.9%	5.1%	9.4%	3.9%
3 Bed	3.8%	3.0%	6.1%	6.5%	2.9%
All	4.4%	5.3%	4.5%	5.7%	3.9%

Source: Apartment Association of Metro Denver Rent and Vacancy Survey, 3rd Quarter 2014

Figure 4: Vacancy Rates by Bedroom Size, 3rd Quarter 2010 - 2014



Source: Apartment Association of Metro Denver Rent and Vacancy Survey, 3rd Quarter 2014

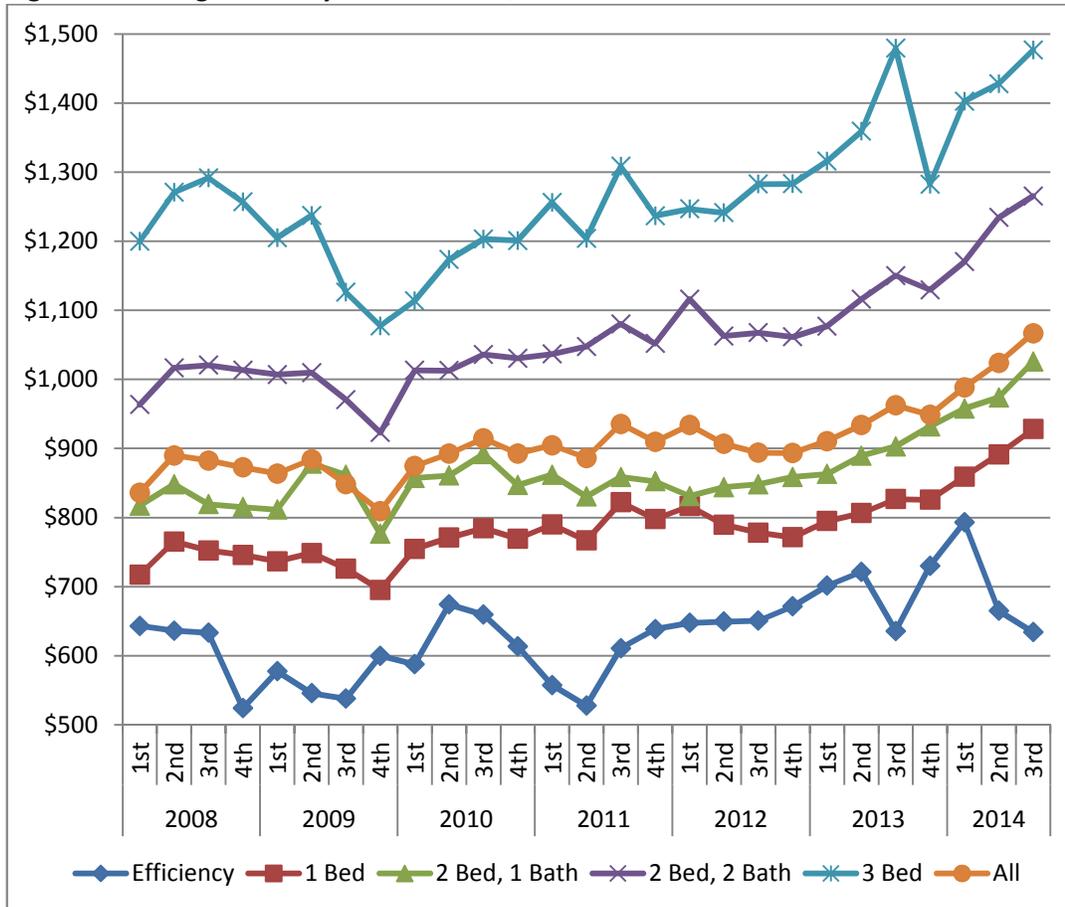
Median rents have grown an average of 16% during the past five years in Adams County. Increased demand has allowed property owners to increase rent for all of rental housing units but efficiencies.

Table 30: Median Rents by Bedroom Size, 3rd Quarter 2010-2014

	2010	2011	2012	2013	2014
Efficiency	\$659	\$611	\$651	\$636	\$634
1 Bed	\$784	\$822	\$778	\$827	\$928
2 Bed, 1 Bath	\$892	\$859	\$848	\$903	\$1,026
2 Bed, 2 Bath	\$1,036	\$1,080	\$1,068	\$1,150	\$1,265
3 Bed	\$1,203	\$1,308	\$1,283	\$1,479	\$1,477
All	\$915	\$935	\$894	\$963	\$1,067

Source: Apartment Association of Metro Denver Rent and Vacancy Survey, 3rd Quarter 2014

Figure 5: Average Rents by Bedroom Size, 3rd Quarter 2010-2014



Source: Apartment Association of Metro Denver Rent and Vacancy Survey, 3rd Quarter 2014

Rents per square foot have increased at a higher pace than rents per unit, as shown in Table 31. Rents per square foot rose 22% overall from 2010 to 2014. Square foot rose at a slower pace during this time period for smaller units, and declined slightly for efficiencies.

Table 31: Average Rents per Square Foot, 3rd Quarter 2010-2014

	2010	2011	2012	2013	2014
Efficiency	\$1.26	\$1.18	\$1.24	\$1.35	\$1.22
1 Bed	\$1.11	\$1.21	\$1.15	\$1.23	\$1.37
2 Bed, 1 Bath	\$1.04	\$1.01	\$1.01	\$1.10	\$1.23
2 Bed, 2 Bath	\$0.99	\$1.05	\$1.03	\$1.11	\$1.22
3 Bed	\$1.02	\$1.06	\$1.02	\$1.17	\$1.26
All	\$1.06	\$1.11	\$1.09	\$1.17	\$1.29

Source: Apartment Association of Metro Denver Rent and Vacancy Survey, 3rd Quarter 2014

The following table shows the price restricted affordable rental inventory currently available in Adams County. Units are owned by housing authorities, nonprofit housing providers, and private owners. CSI found a total of 6,500 price restricted units in Adams County. Only five percent (5%) of affordable units in Adams County are targeted to households at 30% AMI. Another 11% are targeted at 40% AMI, 16% at 50% AMI, 52% at 60% and 5% at 80% AMI.

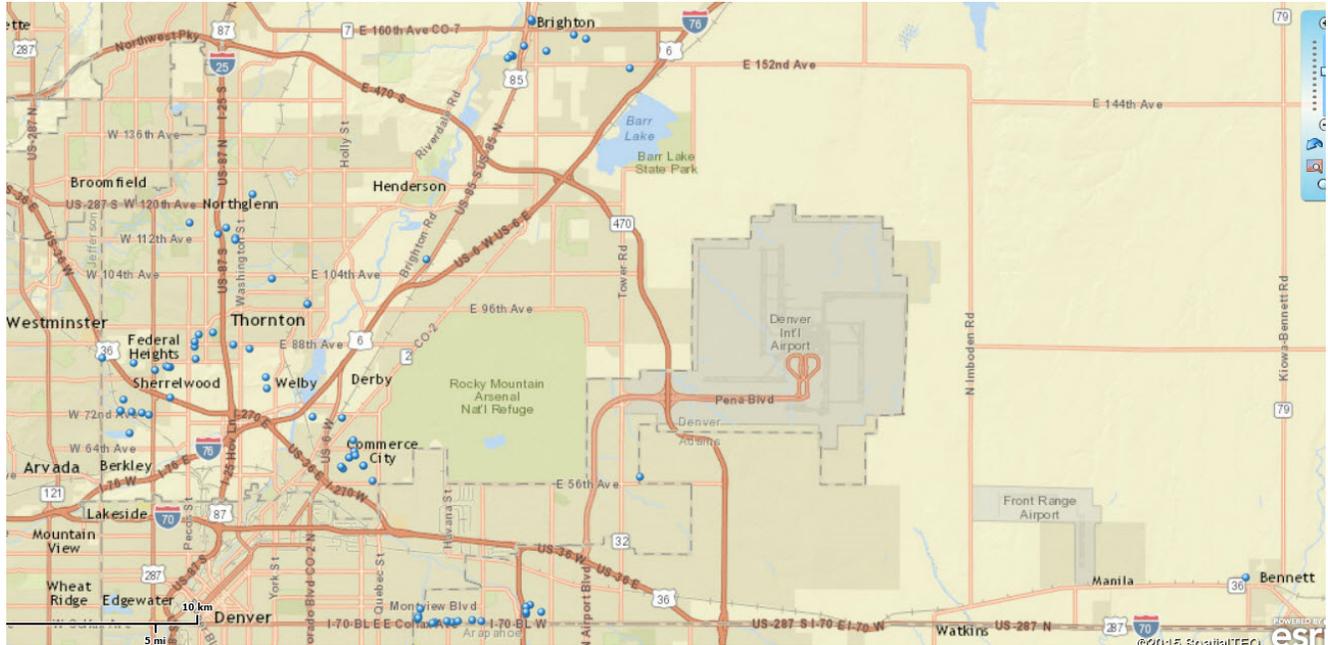
Table 32: Affordable Rental Inventory, Adams County

Restricted Units	30% AMI	40% AMI	50% AMI	55% AMI	60% AMI	80% AMI
6,500	5%	11%	16%	3%	52%	5%

Source: CSI

Restricted rental units are distributed throughout the County, with concentrations in the older, southern, incorporated communities in Adams County. Map 3 shows the locations of affordable units throughout the County.

Map 3: Map of Affordable Properties in Adams County



Source: CSI (see Appendix C for larger map)

Table 33 shows the 2015 HUD HOME and Fair Market Rent limits for the Denver-Aurora-Broomfield MSA, which includes Adams County. Owners of affordable properties must meet these rent guidelines, and Section 8 voucher holders must find units at or below the Fair Market Rents, which is becoming a challenge, according to the local housing authorities and non-profit housing providers.

Table 33: HUD Rent Limits 2015

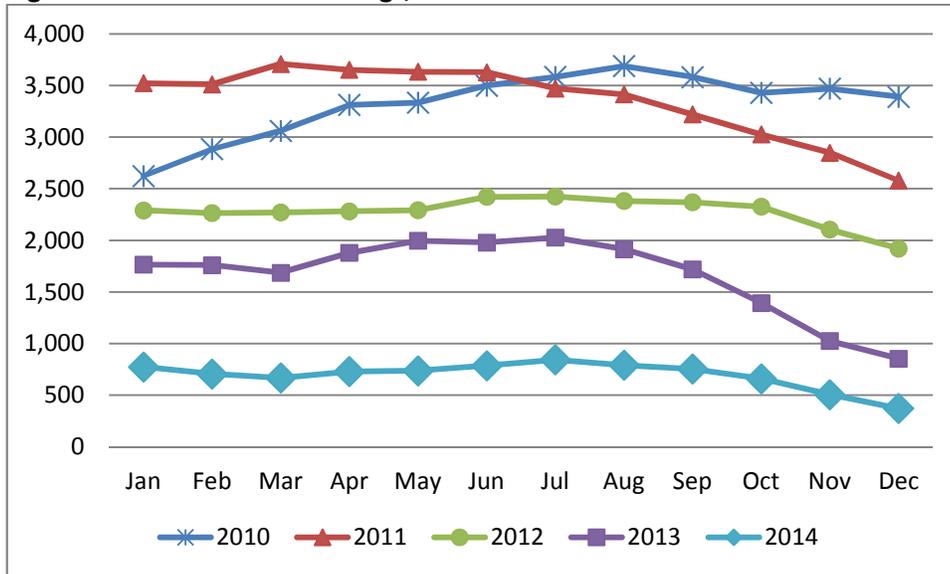
Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$723	\$893	\$1,156	\$1,696	\$1,967
High HOME Rent	\$723	\$893	\$1,156	\$1,339	\$1,474
Low HOME Rent	\$700	\$750	\$900	\$1,038	\$1,158

Source: HUD CPD

HOMEOWNERSHIP PROFILE

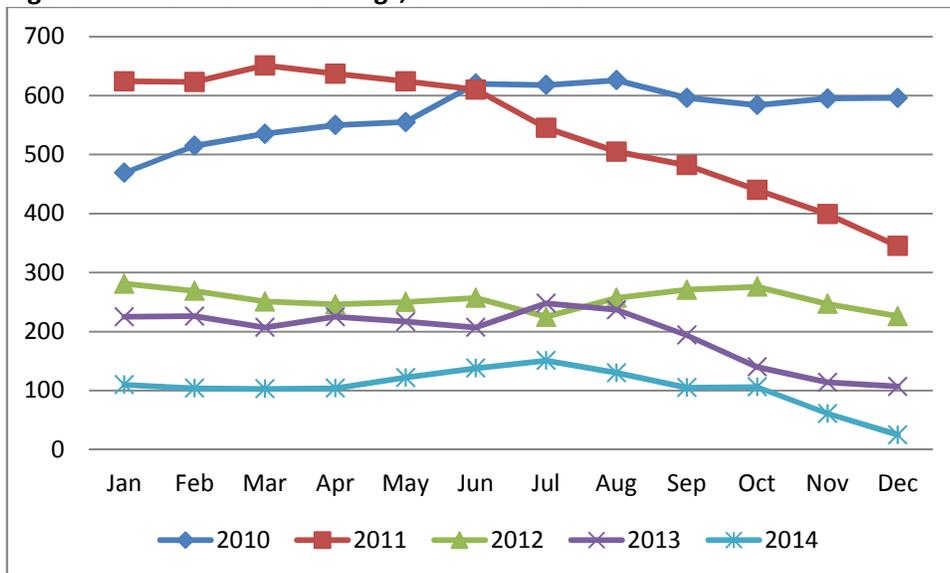
CSI used current Multi-list listings and information from Metro List to prepare an analysis of the sales market in Adams County. Home prices in Adams County have been on the rise, and the inventory of available units for sale has been on the decline. The following charts provide information about sales, listing, and price trends in Adams County through the end of 2014. Active listings have declined significantly since 2010. In December of 2014, there were only 373 single family and 25 attached units for sale throughout the county. In December of 2014, the MLS system showed only one month's sales inventory available on the market in Adams County.

Figure 6: Detached Sales Listings, December 2014



Source: MLS, CSI

Figure 7: Attached Sales Listings, December 2014



Source: MLS, CSI

In the past five years, the number of home sales in Adams County has grown, as shown in Table 34. Median sales prices for detached units grew by over 10% per year for the past three years. Attached unit median sales prices grew by 30.6% from December 2011 to December 2012, and by over 10% per year since (Table 35 and Figure 8 and Figure 9).

Table 34: Number of Annual Sales, Adams County

	Detached	Attached
2009	5,687	982
2010	4,833	813
2011	4,676	795
2012	5,203	775
2013	6,325	1,040
2014	6,096	1,506

Source: MLS, CSI

Table 35: Sales Prices Over Time, Adams County

Detached Units	Average Sales Price	% Change	Median Sales Price	% Change
Dec-10	\$192,210		\$169,900	
Dec-11	\$181,947	-5.3%	\$164,975	-2.9%
Dec-12	\$207,856	14.2%	\$186,500	13.0%
Dec-13	\$251,657	21.1%	\$221,000	18.5%
Dec-14	\$266,054	5.7%	\$245,000	10.9%
Attached Units	Average Sales Price	% Change	Median Sales Price	% Change
Dec-10	\$118,475		\$110,000	
Dec-11	\$103,160	-12.9%	\$97,253	-11.6%
Dec-12	\$137,726	33.5%	\$127,000	30.6%
Dec-13	\$141,715	2.9%	\$139,900	10.2%
Dec-14	\$164,498	16.1%	\$155,625	11.2%

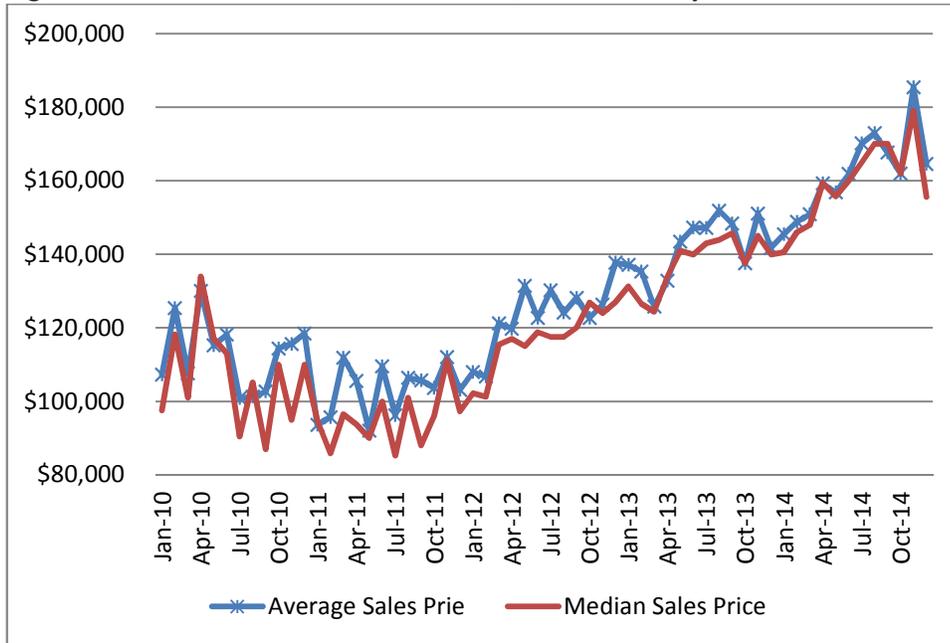
Source: MLS, CSI

Figure 8: Detached Sales Prices Over Time, Adams County



Source: MLS, CSI

Figure 9: Attached Sales Prices Over Time, Adams County



Source: MLS, CSI

Table 36 shows that since 2010, there have been permits for 3,911 new single family homes in Adams County, 84 duplex units, 31 three and four family, and 553 multi-family units annually. Permit numbers have increased during this time period for single family and multifamily units. Construction of 2 – 4 unit properties has declined significantly, as it has throughout Colorado, most likely due to a change in the construction defects law that has discouraged development of these types of units. As the home sales market picks up and inventory of existing units declines, developers should continue to construct new housing units at the pace seen in 2013 and 2014.

Table 36: Building Permits over Time, Adams County

	2010		2011		2012		2013		2014 (through Nov)	
	Buildings	Units	Buildings	Units	Buildings	Units	Buildings	Units	Buildings	Units
Single Family	558	558	546	546	793	793	1,032	1,032	982	982
Two Unit	34	68	2	4	1	2	2	4	3	6
3 – 4 Unit	3	9	5	15	0	0	1	4	1	3
Multifamily	2	27	0	0	8	220	10	300	1	6
Total	597	662	553	565	802	1,015	1,045	1,340		

Source: Source: U.S. Bureau of the Census Building Permit Estimates

Foreclosures have declined dramatically in Adams County in the past few years. The Colorado Division of Housing tracks foreclosures by county in the state. In 2014, there were 1,200 foreclosure filings in Adams County, a reduction of 27% from the prior year, and a reduction of 75% from 2010. Foreclosure sales have also dropped significantly, as has the rate of foreclosure per household in the county.

Table 37: Foreclosures in Adams County Over Time

Year	Number of Foreclosure Filings	Number of Foreclosure Sales	Foreclosure Rate Per # of Households
2010	4,891	2,856	305
2011	3,553	2,099	355
2012	3,182	1,782	366
2013	1,636	963	931
2014	1,200	548	1,648

Source: Colorado Division of Housing Foreclosure Reports

The foreclosure crisis had a very significant impact on the housing market in the US, and in Adams County. However, the housing market in Adams County is recovering, as less units fall into foreclosure, fewer foreclosed and bank owned properties are on the market, and increases in values and prices allow many owners to keep their homes.

AFFORDABLE HOUSING NEEDS

CSI estimated the price gap for rental and for-sale housing at each HUD income range for Adams County residents. Renters at 30% AMI or less cannot afford the median rent. Renters at 31 - 60% AMI may be able to afford the median rent, but the current vacancy rate and unit availability makes it difficult for these households to find units affordable to them. Renters interested in purchasing homes earning 60% AMI or less will have a difficult time purchasing a home without significant subsidy. Down payment assistance for households at 80% AMI or less is necessary to help these households purchase units within their price range.

Table 38: Renter Housing Gap, 2013

Percent of 2013 AMI	Lower end of income range	Upper end of income range	Renter-occupied Households	Max Rent in Range	Median Rent	Gap
0-30% AMI	\$0	\$23,010	15,809	\$575	\$837	\$262
31-50% AMI	\$23,011	\$38,350	12,177	\$959	\$837	NA
51-60% AMI	\$38,351	\$46,020	5,503	\$1,151	\$837	NA
61-80% AMI	\$46,021	\$61,360	7,372	\$1,534	\$837	NA
81-100% AMI	\$61,361	\$76,700	5,750	\$1,918	\$837	NA
100-120% AMI	\$76,701	\$92,040	2,950	\$2,301	\$837	NA
Over 120% AMI	\$92,041		5,020	>\$2,301	\$837	NA

Source: CSI

Subsidized rental housing is targeted to households at the 60% AMI range or less, while homebuyer programs usually target households with incomes higher than 60% AMI, usually up to a maximum of 100% AMI.

Table 39: Owner Housing Gap, 2013

Percent of 2013 AMI	Lower end of income range	Upper end of income range	Owner-occupied Households	Max Purchase Price	Median Priced Home	Gap
0-30%	\$0	\$23,010	9,392	\$88,500	\$226,850	\$138,350
31-50%	\$23,011	\$38,350	12,531	\$147,000	\$226,850	\$79,850
51-60%	\$38,351	\$46,020	6,595	\$176,500	\$226,850	\$50,350
61-80%	\$46,021	\$61,360	13,947	\$235,500	\$226,850	NA
81-100%	\$61,361	\$76,700	13,815	\$294,500	\$226,850	NA
100-120%	\$76,701	\$92,040	10,630	\$353,000	\$226,850	NA
Over 120%	\$92,041		32,907	>\$353,000	\$226,850	NA

Source: CSI

Owner households with incomes at or below 80% of the area median income can often have a hard time keeping up with maintenance of their homes after paying a mortgage, taxes, and insurance. These households are candidates for homeowner rehabilitation programs. In Adams County, there are approximately 42,500 owners with incomes at or below 80% of the area median income.

Renter households with incomes at or below 30% AMI often need deeply subsidized rental housing, either with extremely low rents or a rental assistance voucher. There is a shortage of housing affordable to these households. In Adams County, there are 15,809 renter households with these low incomes. This number is much higher than the number of rent assisted housing units or rental assistance vouchers available to this population.

AVAILABILITY OF ACCESSIBLE HOUSING

Adams County Housing Authorities have some fully accessible rental units in the affordable housing stock, though much of the older rental housing stock is not accessible. Units reviewed for this study are owned by the Adams County Housing Authority and the Brighton Housing Authority. Newer units funded by the HOME program must provide 5% accessible units. Considering the number of households with disabilities, and those with disabilities living in poverty, this number is insignificant to address the need for fully accessible housing units.

MAPS

The following maps are included at the end of this report in Appendix C:

- Maps #1 — Areas of Minority Concentrations
- Maps #2 –Low Income Concentrations
- Map #3 – Price Restricted Rental Housing Locations

SECTION THREE: EVALUATION OF FAIR HOUSING LEGAL STATUS

FAIR HOUSING COMPLAINTS:

EVALUATION OF JURISDICTION’S CURRENT FAIR HOUSING STATUS

Adams County residents filed eighty complaints with HUD between January 1, 2009 and December 31, 2013, the latest provided by HUD and the State of Colorado. These complaints are the latest to be reported by HUD. These eighty complaints resulted in 47 individual cases filed. The most frequently named protected class was physical disability (33%), followed by race (African-American 21%) and mental disability comprised 15% of cases filed. The top violations that the complaints alleged included discrimination in terms, conditions, privileges or services and facilities (20%) and failure to make reasonable accommodations (18% of cases filed).

Sixty-one percent (61%) of the complaints were found to have no cause and were dismissed by HUD. In 21% of the cases filed, the complainant withdrew their complaint after a successful conciliation/ settlement was reached.

Table 40: Summary of HUD Complaints, 2009-2013

	2009	2010	2011	2012	2013	Total
Number of Cases	11	8	6	10	12	47
Number of Complaint Issues:	20	11	7	16	26	80
Most Common protected Class Affected	Color/Black	Physical Disability	Physical Disability	Physical Disability	Physical Disability	
Most Common Alleged Violation:	Discriminatory Refusal to Rent (3) Discriminatory Terms (3) Discriminatory Acts -Sec 818 (3)	Failure to Make Reasonable Accommodation	Otherwise Deny or Make Housing Unavailable	Discriminatory Terms/ Conditions	Discriminatory Terms/ Conditions	
Most Common Resolution	No Cause Determination	No Cause Determination	No Cause Determination	No Cause Determination	Complaint Withdrawn by Complainant After Resolution	

Source: HUD-Office of Fair Housing

Between 2009 and 2013, eighty fair housing complaints resulting in forty-six cases were filed with the Colorado Civil Rights Division on behalf of Adams County Residents. The most common basis for complaints filed with Colorado Civil Rights Division was disability (25). The second and third most common basis for complaints filed during this time period was sex (14) and race (13). Complaint data was not tracked by City, so all Adams County communities are included in these numbers.

Table 41: Summary of Fair Housing Complaints to the Colorado Civil Rights Division, 2009-2013

	2009	2010	2011	2012	2013	Total
Number of cases	8	7	6	15	10	46
Number of complaint issues	11	9	11	29	17	80
Most common basis of complaint	Disability	Race	Sex	Disability	Disability	
Most common resolution	No Probable Cause					

Source: Colorado Civil Rights Division

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 above described discriminatory practices 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 and document. 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

Adams County residents are served by four housing authorities (Adams County Housing Authority, Aurora Housing Authority, Brighton Housing Authority, and Commerce City Housing Authority). The Adams County Housing Authority (ACHA) is the largest provider of affordable housing units and tenant based rental assistance in Adams County. ACHA owns 1,510 housing units in total. The Housing Authority also has a partner 501(c) (3) organization, which develops housing and provides services to Adams County residents. ACHA is a small housing authority, and is rated high performing in good standing by HUD. The agency is a leader in the development of new housing units at and near transit stops.

ACHA owns and manages 42 public housing units targeted to seniors and persons with disabilities. ACHA also manages Orchard Crossing, a 72-unit property with project based rental assistance in Westminster, and Creekside Place Apartments, a 71-unit property with project based rental assistance in Thornton. ACHA offers housing counseling services, including foreclosure prevention counseling, homebuyer counseling, Back to Work counseling, and rent and utility delinquency counseling and assistance. ACHA is in the process of developing Transit Oriented rental units at multiple sites in Adams County to help meet the growing unmet demand for more affordable rental units near transportation services.

The Brighton Housing Authority is also within Adams County. The Housing Authority owns public housing units and also has Section 8 vouchers. The Commerce City Housing Authority does not provide Section 8 or other rental assistance services. The Aurora Housing Authority operates in the City of Aurora, which prepares its own Analysis of Impediments to Fair Housing, and the Commerce City Housing Authority does not own or operate rental units or have a Section 8 voucher program.

There are a total of 3,841 households on the waiting list for housing at ACHA. Households stay on the waiting list for an average of 142 days. Thirty percent (30%) of households on the waiting list are one person households. Approximately 45% are two and three person households, and another 15% are four person households. Only 10% have five or more household members.

Table 42: Adams County Housing Authority Waiting Lists, Household Size, 2014

Household Size	Number	Percentage
1	1161	30.0%
2	923	23.9%
3	783	20.3%
4	564	14.6%
5	246	6.4%
6	124	3.2%
7	59	1.5%
8	5	0.1%
9	1	0.0%

Source: Adams County Housing Authority

Forty-four percent (44%) of households on the waiting list are white, 30% are black, and 7% are American Indian. Thirty-six percent (35.5%) are Hispanic. Just under 60% of households on the waiting list are families, another 17% are disabled, 6.6% are elderly, and 17.1% are "other".

Table 43: Adams County Housing Authority, Race and Ethnicity of Waiting List Households, 2014

Race/Ethnicity	Percentage
American Indian	6.8%
Asian	0.5%
Black	29.8%
Native Hawaiian	0.2%
White	44.1%
Multiple	2.8%
Unknown	15.8%
Hispanic	35.5%

Source: Adams County Housing Authority

Table 44: Adams County Housing Authority, Household Type of Waiting List Households, 2014

Type	Percentage
Disabled	17.1%
Elderly	6.6%
Family	59.2%
Other	17.1%

Source: Adams County Housing Authority

Waiting lists are so long that they often are closed for multiple years. The majority of households on the waiting lists are extremely low income, and the highest numbers are families.

EXPIRING HOUSING ASSISTANCE CONTRACTS

The Colorado Housing Finance Authority (CHFA) and local housing financing agencies have acknowledged that expiring tax credit and other financing is an issue in the metro Denver area. CHFA and Mile High Connects recently announced an initiative to preserve units that could be lost to the affordable inventory, by having a dedicated state staff person who will identify all expiring properties and make all efforts to extend restrictions or negotiate sales to nonprofit and local owners who will keep properties affordable for extended periods. At this time, there are no known properties that are expected to be lost from the affordable housing inventory in Adams County.

SPECIFIC HOUSING CONCERNS

HOUSING NEEDS OF PERSONS WITH DISABILITIES

There are a variety of agencies that serve persons with special needs in Adams County. These groups include the elderly, persons with mental, physical, and intellectual and developmental disabilities (IDD), persons with HIV/AIDS, and persons with alcohol or drug addictions. Some individuals with disabilities may have limited ability to work and earn a living, requiring them to live on Social Security Disability. They may also require modified housing units that include ramps, widened doors, and other features, service enriched housing that includes assistance with activities of daily living, a group quarter or an assisted living environment.

The US Census American Community Survey (ACS) collects data related to disability status. In 2013, Adams County showed that 11% of its population had a disability (compared to 10% throughout Colorado). Persons may have more than one self-reported disability. The most common disabilities were ambulatory, hearing and independent living difficulties. These disabilities can all require service enriched or modified housing units. The percentage of the population with disabilities grows as the population ages, and more individuals have mobility impairments.

Table 45: Disability Status, Adams County 2013

	%	Number
Disability	11.00%	51,192
Hearing difficulty	3.52%	16,375
Vision difficulty	2.55%	11,896
Cognitive difficulty	3.73%	17,387
Ambulatory difficulty	5.43%	25,276
Self-care difficulty	2.20%	10,233
Independent living difficulty	9.45%	44,029

Source: US Census Bureau, American Community Survey

In Adams County, there are a variety of nonprofit organizations that specialize in serving persons with mental illness, developmental disabilities, the frail elderly, and persons with substance abuse issues.

Frail elderly/ Elderly - The supportive housing needs of this population may involve maintaining individuals in their homes with minor home repairs, in-home support services, at-home nursing (skilled) care and hospice care.

Persons with Physical Disabilities - accessible, and adaptable housing is a primary housing need for people with disabilities and their families. Affordable housing with supportive services is needed to serve these populations effectively. Many people with disabilities are best served in an independent living environment and some need higher levels of support and supervision. The trend in the size of group living facilities to serve this population segment is toward smaller facilities. There are significant financial challenges with this model.

Mental Illness - For individuals with mental illness, supportive housing is critical to avoid homelessness. Types of services include home based case management, therapeutic services, medication monitoring and peer to peer support.

Substance Use Disorders – People with serious mental illness, substance use disorders or co-occurring disorders require coordinated and accessible treatment and support. Permanent supportive housing, particularly for those who have experienced homelessness is critical to prevent future episodes of homelessness. Peer supports and case management support can be effective services for this population.

HIV/AIDS - The supportive housing needs of person living with AIDS are unique and varied. Some require only short term assistance with their rent, mortgage or utilities. Others who have multiple diagnoses of HIV and co-occurring disorders may require longer term supportive housing. Supportive housing allows people living with HIV/AIDS to access drug therapies and other health/mental health supports.

Overall, the biggest need mentioned by providers in interviews, discussion panels, and public meetings, was for additional housing units affordable to very low income households, units that have accessibility features for those with physical disabilities, additional service dollars, and more reliable and cost efficient transportation options for clients.

Senior citizen residents in Adams County are one special needs group that may require assistance with finding affordable and accessible housing, service enriched housing, and other services such as meal delivery and transportation.

Table 46: Summary of Special Population Housing Needs

Population Group	Needs for Adams County Residents
Seniors	Home services to keep seniors in their own homes. Assisted living units Accessibility features in housing units Home rehabilitation services Mental Health Services
Persons with Physical Disabilities	Low cost affordable rental housing that is accessible by wheelchair or walker Affordable, reliable and accessible (near housing and work) transportation options
Persons with Mental Health Disabilities	Sufficient residential treatment opportunities for clients
Persons with Substance Abuse Issues	Funding for enhanced case management and services
Persons with HIV/AIDS	Low cost affordable rental housing units

Source: CSI Research and Interviews

HOUSING NEEDS FOR THE HOMELESS

CSI interviewed all homeless providers serving Adams County to prepare this analysis of homeless needs within the county. The seven county Metro Denver Homeless Initiative (MDHI) conducts an annual Point-in-Time (PIT) count of people experiencing homelessness in Adams County and throughout the jurisdiction. On January 27, 2014, there were a total of 5,812 homeless persons counted in the Metro Denver Seven County jurisdiction. In Adams County, 215 homeless individuals were surveyed (respondents), and also reported their family members for a total of 532 (all homeless in Adams County). This number represents 9.2% of the overall homeless population for the seven county metro area.

The following table organizes homeless individuals in Adams County into HUD required categories. The PIT tabulates sheltered and unsheltered, but does not break this information down into sub-population categories required for Consolidated Plans by HUD. CSI estimated sheltered and unsheltered based upon the total ratio of unsheltered individuals (11.2%) to sheltered individuals (88.8%) in Adams County. Certain subpopulations are more likely to be unsheltered than others. CSI also estimated the total number of persons experiencing homelessness each year by multiplying those homeless on a given night by 1.538, as 53.8% of those counted had been homeless for less than 12 months. The number exiting homelessness was estimated by taking the total number who may be homeless in a year and subtracting those counted in shelters during the count. The estimated days persons experienced homelessness could not be calculated by population group, and was estimated using weighted averages of the length of homelessness for all persons who reported in the count.

Table 47: NA-40 Homeless Needs

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year
	Sheltered	Unsheltered	
Persons in Households with Adult(s) and Child(ren)	48	380	958
Persons in Households with Only Children	0	0	0
Persons in Households with Only Adults	5	37	65
Chronically Homeless Individuals	4	32	55
Chronically Homeless Families	0	0	0
Veterans	2	12	22
Unaccompanied Child	0	0	0
Persons with HIV	0	1	2

Source: Metro Denver Homeless Initiative 2013 Point-in-Time Count

Point in Time Findings

The PIT found that approximately fifty-four percent (54%) of homeless counted had been homeless for less than 1 year and eighteen percent (18%) had been homeless for 1-3 years. These estimates do not include the “hidden homeless”, or those doubled up with friends and relatives in order to avoid living on the streets or in emergency shelter facilities. CSI estimates that this is the largest segment of the homeless population in Adams County. These arrangements are usually temporary and often the party who is a guest must seek other housing options including shelter space. The “hidden homeless” can either find new housing on their own or can end up as one of the homeless without a place to stay, depending upon their individual situation. Often, if members of this group are able to gain better employment or get some economic assistance with medical bills or other expenses, they will find a way to obtain a new housing arrangement on their own.

CSI estimates that there are 3,779 persons doubled up with friends or non-relatives in Adams County, and 9,240 doubled up with family. The estimate is formulated using national research and accepted methods for calculating doubled up numbers. The estimate is made using 2013 ACS census data that details the relationship of persons living in each housing unit.

There is a higher percentage of minorities in Adams County’s homeless population than within the population as a whole. Only 35% of the Adams County homeless counted in 2013 were white, while over eighty percent (80.6%) of Adams County’s population as a whole is white. Sixteen percent (16%) were African American, and 3.4% were Native American. Almost thirty-five percent (34.7%) were Hispanic.

Table 48: Race and Ethnicity, Point-in-Time 2014

	Number	Percent
Asian, Pacific Islander	1	.5%
Black, African American	62	31.3%
Native American, Alaska	1	.5%
Valid Native	0	0.5%
White	170	35.1%
Mixed race	18	9.1%
Other	1	0.5%

Source: Metro Denver Homeless Initiative 2014 Point-in-Time Count

Forty-four percent (44%) of the homeless persons counted in the PIT had been homeless for more than one month but less than one year. Another eighteen percent (18%) had been homeless from one to three years, and four percent (4%) had been homeless for more than three years.

Table 49: Duration of Homelessness, Point-in-Time 2014

	Percent
I am not homeless now	4.3%
Less than 1 month	9.5%
More than 1 month but less than 1 year	44.3%
1 to 3 years	18.1%
More than 3 years	4.3%
Total	100.0%

Source: Metro Denver Homeless Initiative 2014 Point-in-Time Count

Fifty percent (50%) of homeless had been homeless only one time, according to the count. Another forty-two percent (42%) had been homeless two or more episodes of homelessness. An individual is considered to be

experiencing “episodic homelessness”, becoming homeless multiple times, when they are having recurrent problems with housing. Often these individuals have seasonal/minimum wage income or sporadic domestic situations that affect stable housing, according to national researchers.

Table 50: Homeless Episodes, Point-in-Time, 2014

	Percent
One	50.0%
Two	22.2%
Three	8.5%
Four	2.8%
Five or more	8.0%
Not homeless any time last 3 years	8.5%

Source: Metro Denver Homeless Initiative 2014 Point-in-Time Count

The leading causes of homelessness in Adams County, according to PIT respondents, were lost jobs, high housing costs, family problems, credit problems, and mental illness. Twenty-four respondents were homeless because of domestic violence issues. All homeless providers interviewed cited a lack of affordable rental housing units for very low income households and for those who have experienced bad credit. The recent increases in rental prices and reduction in vacancy rate is only increasing this problem.

Table 51: Adams County Shelter Beds

Agency	City	Beds	Population
Shelter Beds			
Almost Home	Brighton	14	families
Access Housing	Commerce City	34	families
Growing Home	Westminster	14	families
Communities of Faith	Varies	varies	individuals
Arising Hope	Thornton	5	families
Alternatives to Family Violence	Adams County	22	families
Shiloh House	Thornton	20	Youth – only by referral
TOTAL BEDS		120	
Transitional Housing Units			

Source: CSI Research

Table 52: Transitional Housing Units

Agency	City	Units	Population
Almost Home	Brighton	3	families
Access Housing	Commerce City	27	families
Growing Home	Thornton	4	families up to 2 years
TOTAL UNITS		34	

Source: CSI Research

Alternatives to Family Violence provides shelter and services for victims of domestic violence. The agency operates a 22 bed facility in Commerce City. The occupancy rate at the shelter runs at capacity each night, and often individuals are turned away. Requests for shelter are rising. Arising Hope also operates a domestic violence shelter in Thornton that has five beds. The agency was able to serve 25 people in 2014 and had a waiting list of 30 – 90 days. Clients have a hard time finding affordable housing units when done with the

program and have had to stay with the agency so that they do not become homeless. Arising Hope received 150 – 200 calls monthly for assistance, more than triple the calls from a few years ago.

Almost Home operates three family units year round for homeless families. The units stay occupied continually. Almost Home also provided rent and utility assistance to their clients, and in 2014, provided 2,110 nights of shelter. Still, the agency receives over 400 calls a month, and can only help 1 – 12 families a month. Emergency rent and utility assistance requests in one month equal the total amount of funds the agency receives for assistance annually. Almost Home has expanded their capacity and now can serve up to six families with emergency shelter at a time. As one of only three shelters in Adams County, the agency has more demand than they can serve. In 2014, over 52% of the individuals Almost Home served were children.

Access Housing in Commerce City provides emergency shelter with 20 beds available year round and 14 emergency overflow beds. The agency also owns 27 transitional housing units utilized by families. In 2013, ACCESS Housing served 97 families in emergency shelter and 49 families in short-term shelter. 122 families received \$101,798 in financial assistance to prevent homelessness.

Growing Home provides emergency rent and utility assistance, operates 14 shelter beds, and owns 16 permanent and four transformational housing units for families. The agency also operates a food bank and early childhood education programs. Growing Home served over 5,000 residents with housing and services last year. The agency is located in Westminster.

Communities of Faith United operates a cold weather shelter in Adams County called Cold Weather Care. The beds are open at local churches that rotate hosting beds. The shelter operates from October through April each year. Over the past four seasons, Cold Weather Care has served 323 individuals. Cold Weather Care offers intensive case management geared toward self-sufficiency. In 2013, during the winter months, the coalition of churches sheltered 24 households and 51 people. This organization focuses on helping its guests find permanent housing options. According to staff, this is becoming more difficult as the vacancy rate in Adams County is low and rents are often out of reach.

Shiloh House is a youth oriented service provider in Thornton with a 20 emergency bed capacity for homeless or run away youth. Youth must access services through the Link in order to access a bed at Shiloh House. Also on-site is P.A.T.H., which offers pre-trial release supervision, work with youth with truancy cases, and work with families whose youth have been away at treatment. The 2014 MDHI Point-in-Time survey counted eighteen youth (or 8.4% of homeless population), ages 18 – 24.

There are some transitional housing opportunities for Adams County citizens though providers interviewed stated that the inventory does not meet current need. Access Housing operates 27 transitional housing units. Almost Home owns and operates Hughes Station in downtown Brighton, which offers low rent and subsidized apartments for families transitioning out of the homeless shelter. Growing Home has four transformational housing units for families and 16 permanent housing units. The Colorado Coalition for the Homeless owns the Renaissance 88 apartments in Thornton. This 108 unit affordable housing complex has project based rental assistance, case management, and services for formerly homeless families, individuals, and disabled individuals.

The Bennett Community Food Bank serves the Eastern I-70 Corridor which includes the communities of Watkins, Bennett, Strasburg, Byers, Deer Trail and Agate. It is located at the Bennett Community Center. The Food Bank has experienced an increase in the number of Adams County families requesting assistance in the past year. It currently assists 391 individuals (102 families).

HOUSING NEEDS FOR SENIORS

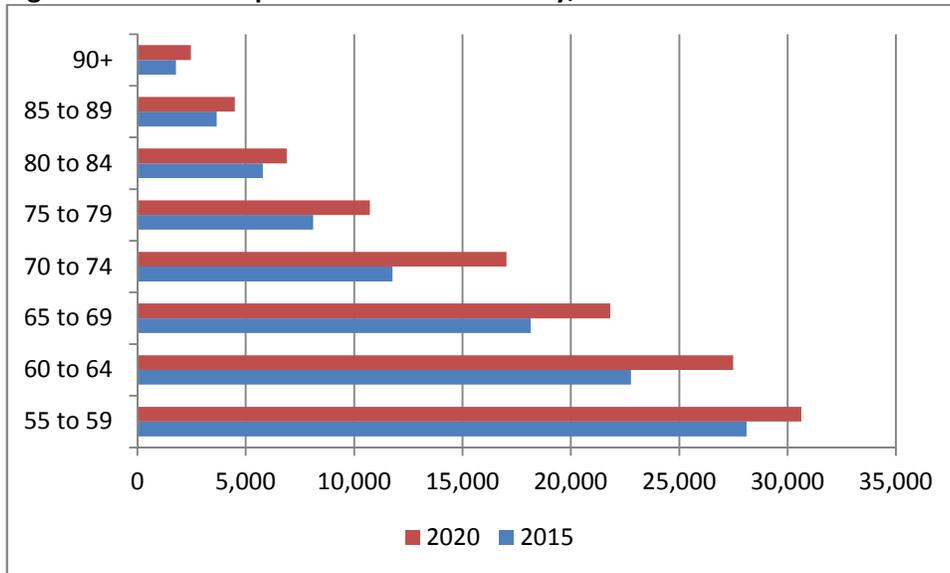
Adams County is forecast to experience a steady increase in seniors. In 2015, Adams County is home to nearly 100,000 residents over the age of 55. By 2020 this number will increase to over 121,000 (a 21% increase). The 2013 American Communities Survey estimates that 40,439 seniors over the age of 65 are living in poverty, equaling 9.2% of the total senior population. This data identifies 16,306 seniors age 65 and over with a disability, representing 38.1% of the total senior population in the county.

Table 53: Senior Population Growth in Adams County, 2015 to 2020

Age Group	2015	2020	Change	% Change
55 to 59	28,105	30,636	2,531	9.0%
60 to 64	22,774	27,488	4,714	20.7%
65 to 69	18,143	21,813	3,670	20.2%
70 to 74	11,768	17,029	5,261	44.7%
75 to 79	8,103	10,723	2,620	32.3%
80 to 84	5,790	6,888	1,098	19.0%
85 to 89	3,657	4,495	838	22.9%
90+	1,781	2,465	684	38.4%

Source: American Community Survey and CSI

Figure 10: Senior Population in Adams County, 2015 to 2020



Source: Colorado Department of Local Affairs and CSI

There are a number of senior targeted rentals located in Adams County financed through tax credits, public housing dollars, the Section 8 new construction program, and HUD 202 program. CSI found 1,207 restricted rental units targeted to seniors in Adams County, or 19% of all affordable rentals. There are also many assisted living facilities in Adams County which provide services as well as housing. HUD data shows that seniors as a group are not as cost burdened as other Adams County households, perhaps due to the high percentage of affordable rental units targeted to seniors in the county.

HOUSING NEEDS FOR MINORITIES

As Adams County continues to grow, the racial and ethnic makeup of its population has not changed dramatically. The vast majority of the population in the county is white. The percent of Hispanic or Latino residents is growing as a portion of all residents, comprising 38.2% of the population in Adams County in 2013, compared to 28.2% of the population in 2000. While data is not available on all races, Latino households are more likely to live in poverty than white households.

Table 54: Change in Population by Race and Ethnicity

	2000	2013
White	77.3%	80.3%
Black or African American	3.0%	3.2%
American Indian and Alaska Native	1.2%	1.0%
Asian	3.2%	3.7%
Native Hawaiian and Other Pacific Islander	0.1%	0.1%
Some other race	11.7%	8.0%
Two or more races	3.5%	3.6%
Hispanic or Latino (of any race)	28.2%	38.2%

Source: US Census American Community Survey

DISPLACEMENT

There have been no known instances of displacement of residents as a result of governmental action.

SECTION FOUR: IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

HUD requires that jurisdictions review previously identified impediments to fair housing choice as part of the update of the Analysis of Impediments update. CSI has completed this review and will be recommending changes in the wording and identification of some impediments. The previous language used in labeling impediments highlighted some problems but lacked more specific descriptions of impediments that impact the lack of affordable housing choices. Some of the items identified in 2007 are beyond the control of Adams County and speak to broader issues of income disparity and the increase in immigration in the County. The following impediments were identified in the 2007 AI.

1. The existence of some housing discrimination on a limited basis.
2. Development related impediments, NIMBY-ism, land development costs and impact fees, growth management and design regulations, employment/housing/transportation linkages.
3. Limited policies and programs support affordable housing 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).
4. Limited supply of starter homes.
5. Language barriers.
6. Lack of resources (adequate income, adequate education, job skills, information).
7. Displacement/loss of housing units.
8. Foreclosure and credit history problems.
9. Lack of state and local regulations and standards governing mobile homes and mobile home communities.

REVIEW OF 2007 IMPEDIMENTS

Impediment 1: Continues to be a challenge because there are instances of housing discrimination. Households with non-English speaking members and households with children are reported to have a more difficult time finding decent rental housing that suits their needs. Key informants indicated that some landlords will refuse to show available units if they believe that the family is non-English speaking or has children in the household. The County has co-sponsored and participated in Fair Housing fairs and training programs to educate property owners and managers on the facets of Fair Housing Laws. The County has posted Fair Housing Regulations on the County website. The County encourages its subgrantees to emphasize Fair Housing education to prospective tenants and requires that property managers of properties funded with County funds display the Fair Housing Logo and provide information sheets to new residents.

Impediment 2: References several different, unrelated issues. The County continues to work with its subgrantees and other stakeholders to educate the Adams County public on the need for affordable, accessible housing for all income groups in the County. Land development costs are largely beyond the control of the County and are influenced by broader market forces than the actions Adams County undertakes. The County has a minimal impact fee structure and the two major components are the Transportation Impact Fee on new developments and land dedications for open space and schools. Neither of those two policies appears to be excessive in comparison with other Front Range counties and municipalities. Some developments within the unincorporated areas of the County have high water and sewer connection fees but that is under the control of various water and sewer districts and Metro Districts. Those fees are largely determined by the cost of acquiring sufficient water rights to serve new developments. The County has basic design and development regulations that are intended to minimize the impact of new development on adjoining land uses and to ensure that new developments don't require ongoing expenditures by homeowners or taxpayers to correct

inadequate infrastructure for new developments. The County does not have a strict growth management policy but does require new developments to pay the costs of expanding public infrastructure such as road, drainage, lighting and utilities so that those costs don't fall back on existing landowners or public agencies. Most Colorado communities have adopted policies and development requirements to ensure that new development and growth pays its own way. The County encourages new developments, particularly those that will be targeted to moderate income households, to consider transit, services, and employment access when siting new residential development whether it is single family for-sale housing or multi-family rental housing.

Impediment 3: Cites the lack of County policies relating to the provision of affordable housing. The County has not adopted a comprehensive affordable housing policy that outlines what incentives or waivers the County is willing to provide for housing developments that target incomes that have difficulty in obtaining housing choices in a competitive market environment.

Impediment 4: Cites the need for affordable starter homes in the County. This short fall could be addressed by adopting a comprehensive policy that outlines what concessions or incentives the County would be willing to provide for developers that would target some entry level housing units in their development plans. These incentives or concessions could involve reduced development, design standards, smaller lot sizes, waiver or deferrals of some fees or direct cash subsidies to buy down the development costs of entry level for sale housing. The County completed a Balanced Housing Plan in 2009. This included a number of policy and regulatory recommendations that could impact the identified needs for more rental housing for very low income residents and lower priced entry level starter homes. The items listed earlier in this section reflect the possibilities the County could consider in addressing those needs. Given the changes in population and the Adams County economy, the Balanced Housing Plan could be updated, or a Housing Needs Assessment completed, to provide more current information on what actions the County may include in increasing the number of affordable units in targeted areas, particularly in those areas where new transit linkages will provide residents with lower transportation costs.

Impediment 5: Acknowledges the challenges of non-English speaking residents in navigating the housing market and also understanding their rights and responsibilities in obtaining the type of housing product that their domestic circumstances require. The County encourages local housing providers and Realtors to provide housing information in multiple language formats.

Impediment 6: References income inequality and the challenges households with limited income face in obtaining housing in a competitive market that doesn't serve all households. Adams County is focusing its efforts on a comprehensive anti-poverty strategy that addresses both housing affordability and the need for more employment opportunities that pay a living wage for Adams residents. Generally, residents with higher educational attainment and specialized job skills, have more success in meeting the economic challenges that a tight housing market and economic disparities creates for wage earners who cannot qualify for higher paying jobs. The County has a very robust job training and placement program that provides needed training and placement services to those who find themselves unemployed or under-employed.

Impediment 7: Discusses displacement of residents and loss of jobs. There has been no record of housing displacement as a result of government actions or policies. Some redevelopment projects have replaced older substandard housing as part of an area wide redevelopment. The lack of decent affordable housing impacts those lower income households who lose their housing as a result of the property owners plans to redevelop older properties. The County is formulating a comprehensive anti-poverty strategy that highlights the need for more job training and employment readiness services. The County economy is still recovering from the 2008 Great Recession and as new employment opportunities emerge in the County, the anti-poverty strategy is an

essential component to ensure that Adams County residents are able to take advantage of employment opportunities in the County.

Impediment 8: Foreclosure activity in the County has diminished in the last year. As the metro economy improves and home prices show steep increases, there are fewer households who are unable to meet their mortgage obligations. The County supports both homebuyer education and financial literacy training for those households seeking to become homeowners. The County-funded down payment assistance program requires that home purchasers first participate in homebuyer education program operated by County funded agencies or other certified homebuyer training providers.

Impediment 9: Refers to lack of regulation of mobile homes and mobile home parks. The County has a number of mobile homes manufactured before the 1976 National Manufacture Housing Code was adopted by HUD. These older units are often occupied by seniors and those with insufficient means to replace those pre-1976 units with code compliant units. In most manufactured housing parks, the older units are grandfathered in but if a unit were to be moved to another park, most parks don't permit the installation of the older units. The State of Colorado and U.S. HUD have both adopted installation standards that speak to the requirements for the proper installation of a manufactured housing unit. This code also addresses conditions in parks such as utility hook ups, soil conditions, drainage and other infrastructure features servicing the individual unit. The installation standard has forced park management to address conditions within the park that are unsafe conditions or contribute to structural problems of the dwelling units in the park.

PUBLIC SECTOR: ADAMS COUNTY AND NON ENTITLEMENT MUNICIPALITIES

As part of the required analysis for public policies and actions that affect Housing Choice, CSI has reviewed the Comprehensive Plans (General Plan), the development and zoning regulations and the building code requirements promulgated by Adams County and the affiliated municipalities. The Entitlement Communities of Arvada, Aurora, Thornton and Westminster are not included in this review since they complete their own Analysis of Impediments to Fair Housing Choice. In addition to policies and actions that might affect the availability of a diverse supply of housing, CSI also researched other policies and administrative processes that might affect various community development needs in the community. The Public Housing Authorities have a critical role in promoting Fair Housing and Housing Choice. This section also addresses the policies and administrative plans that the Public Housing Authorities in the County have put in place to further Fair Housing Choice. As part of the assessment of public actions affecting Housing Choice, this section also discusses tax policies which may impact the availability of housing choices for all Adams County residents.

1. GENERAL PLAN

- While the Adams County 2012 Comprehensive Plan does not contain a housing element, the County did adopt a Balanced Housing Plan in 2009, which is incorporated into the Comprehensive Plan. The County is currently exploring options for either updating the Balanced Housing Plan or undertaking a Housing Needs Assessment for the County. The plan addresses critical issues such as integrating County Plans with the urban growth plans adopted by the municipalities in the County. The County Plan discourages estate residential development except in specially targeted areas that already reflect the large lot land use pattern. The County Plan encourages denser residential development to occur in municipal boundaries or urban growth areas so that new housing development can be served by municipal utilities and other residential services. The TOD District in the code provides incentives for higher densities and supports diverse housing near transit.
- The Town of Bennett 2012 Comprehensive Plan does not have a housing element. The Plan does list the desire to provide a diversity of housing types affordable to all residents as one the Town's major planning goals.
- The City of Brighton does not have a stand-alone housing element but does address some housing concerns under Principle 8: Promote residential neighborhoods that have distinctiveness and character. Under Principle 8, the policies for implementation include a policy to encourage and incentivize high-end housing developments. There is no mention of housing affordability under Principle 8.
- The Commerce City Comprehensive Plan includes in Chapter 7 a discussion of housing and neighborhoods. Housing affordability is included as a major goal. The plan states: "Housing that is affordable, not only to buy or rent but also that is cost-efficient and healthy to live in, is important to enable more residents to live near where they work to allow them to become economically self-sufficient. Affordable housing should be accessible to transit." Commerce City has established a set of community indicators to provide some quantifiable measurement of the status of the goals in the Comprehensive Plan.
- The Federal Heights Comprehensive Plan has no housing element but does address the need for continued investment in older neighborhoods and the need to encourage and support efforts of mobile home park owners to keep their facilities in good shape.
- The Northglenn Comprehensive Plan includes a housing element in Section 5 of the Plan. The plan acknowledges that there is an adequate supply of affordable single family homes in the community. The plan identifies the need to redevelop older existing detached and multifamily units in order to keep neighborhoods viable. The plan also envisions continuing a relationship with Adams County Housing Authority for redevelopment projects and new affordable developments on the limited amount of greenfield land suitable for multi-family development.

Conclusion: The County Comprehensive Plan is silent on statements of support and incentives for expanding housing opportunities. The Comprehensive plans of most of the municipalities are vague about the specifics of policies and strategies they will use in encouraging and facilitating a broader array of housing choices in their communities. The Plans of the municipalities that do have housing elements are vague on implementation strategies and don't articulate a policy basis for how the local government could encourage and incent greater housing choice.

2. DEVELOPMENT PROCESS AND COSTS

Conclusion: The Adams County development review process does not appear to be an impediment to Fair Housing Choice. In conducting interviews and research for this Report, CSI did not receive any comments that the development process in any of the municipalities creates exceptional burdens to housing development. However, for the past several years, there has been little new development activity in the County or in the Municipal Jurisdictions. The present pace of development has accelerated and backlogs are developing. Many local governments reduced planning staff during the extended market downturn because review revenues were not sufficient to cover the costs. As backlogs begin to form, local processes may become slower and developers will face greater complexity in getting development plans approved. Most of the jurisdictions, including the County have various types of design guidelines, which often extend to landscaping plans as well. Design guidelines tend to increase the costs and review time for projects. The design guidelines adopted by the governmental entities in Adams County do not appear to be overly restrictive. The planning and permitting process has to strike a balance between promoting quality development and excessively burdening builders with more architectural expenses and lengthening the review period. As review periods become longer, the carrying costs for developers increases which eventually get passed to the end consumer in the form of higher sales prices and rents. Adams County has recently combined Community Development, planning and development, building safety and codes under one umbrella of Community and Economic Development Department to help streamline and have a comprehensive approach to land development and community needs.

3. DEVELOPMENT COSTS AND THE OVERALL COST OF HOUSING

Based on the review of published fee schedules for various types of development in the County and relevant municipalities, the percentage of development costs, has remained fairly constant. Government fees and exactions, generally average about 2% of total development cost. The jurisdictions in Adams County tend to fall in the average range of impact fee costs including water and sewer connections. Some jurisdictions have higher water and sewer fees because special districts and Metro Districts set those rate based on the cost of water and the facilities needed to deliver service to individual subscribers. In Adams County, there are several newer Metro Districts which have had to pay premium prices for water shares to deliver to their subscribers. Those costs tend to be higher than those charged in older more established districts because acquisition of water shares in an arid state such as Colorado continues to escalate as the supply dwindles and demand continues to increase.

Adams County does not provide water or sewer services and therefore does not charge fees for utility connections. The County has a very lean fee schedule. The single largest item is the Transit Impact Fee. The fee is based on a service unit model and has scaled fees for differing land uses. For residential uses, the fee schedule follows:

Road Net Cost Schedule

Land Use Types	Development Unit	Service Units/		Net Cost Development Unit
		Development Unit	Net Cost/ Service Unit	
Single-Family Detached	Dwelling	1.35	\$1,184	\$1,599.07
Multi-Family	Dwelling	0.83	\$1,184	\$983.13
Mobile Home park	Space	0.75	\$1,184	\$888.37

Costs for land, materials, and labor have risen much faster than governmental fees. High land prices and the shortage of skilled labor are pushing costs higher at a rapid rate. Because housing providers have to charge enough for their product to cover their production costs and to pay debt service, the upward trend will result in an increase in prices for homeowners and renters alike. The County has listed an increase in the supply of affordable housing units as a priority in the 2015 Consolidated Plan and Annual Action Plan. The only way to combat the market forces driving housing costs is to provide targeted incentives and financing assistance to projects that target lower income households both for homeownership and rental housing opportunities.

Conclusion: Development costs are impediments to fair housing choice as they limit options for households with limited income. Local government should take an innovative approach to designing fee structures and policies that enhance affordability and impose less impact on housing costs to the consumer. In Adams County, where there are a number of municipal governments and the County, greater coordination and consistency in affordable housing policies will bring more predictability to the market and assist developers by giving them a clear picture of what resources government agencies are willing to provide to assist their affordable housing efforts.

4. BUILDING CODES

Adams County and most municipalities in Adams County are using the 2012 International Codes. There are some jurisdictions still using the 2009 version of the International Code. Based on CSI research of the code documents, there are few locally based amendments that impose extraordinary burdens on new construction. With the consolidation of a variety of code bodies into the International Building Code Consortium, the building codes in Colorado and Adams County are becoming more uniform. Having consistent code requirements, that don't vary from jurisdiction to jurisdiction, helps designers and builders better understand the requirements. Because the requirements don't vary that much from jurisdiction to jurisdiction, building engineering and plans can become more consistent which can result in cost savings both at the design and construction phase. Most jurisdictions base their building fees on the published scale included as part of the International Code.

Conclusion: The building codes presently in force in all jurisdictions in Adams County are consistent with what is in place in other areas of the state. They don't appear to impose an excessive burden on builders constructing code compliant buildings.

5. DEFINITION OF "FAMILY"

The Adams County Development Standards and Regulations defines "family in Section 11-02-182: "FAMILY-An individual or three (3) or more persons related by blood, marriage, or legal adoption, living together in a dwelling unit as a single housekeeping unit. Persons not related by blood, marriage, or legal adoption shall be deemed to constitute a family where they are living and cooking together as a single housekeeping unit, but shall not include unrelated students attending colleges or universities."

Group homes in Adams County are considered Group Living Facilities. The Adams County Development Standards and Regulations defines Group Living Facilities in Section 11-02-242: " GROUP LIVING FACILITY: A facility licensed by the Courts, Social Service Department, or other component government authority for housing residents in a group home which include a group home for the aged, residential treatment center,

group home for the mentally ill, home for social rehabilitation, group home for the developmentally disabled, communal home, specialized group facility, receiving home for more than four (4) foster home residents, residential child care facility, or shelter for domestic violence.” Group Living Facilities are permitted in all residential zoning districts if five or less people living in them, and by Conditional Use Permit (CUP) in residential zones for facilities housing more than five persons.

- The City of Brighton uses the following definition:
Family. An individual or two (2) or more persons related by blood, marriage or legal adoption or a group of not more than four (4) persons who are not related by blood, marriage or legal adoption, living together in a dwelling unit. The City of Brighton has specific requirements for the operation of groups homes contained in Section 5-90-80 of the City Code. The City of Brighton requires that the City Clerk approve an operating plan for group homes. This requirement extends the City involvement beyond land use considerations and could be viewed as an impediment to operators and residents of group homes which have previously obtained State and County licenses to operate their facilities.
- Commerce City uses the following definition:
“Family means and includes:
 - a. One (1) or more persons related by blood, marriage or adoption, living together as a single household unit; or
 - b. A group of not more than five (5) persons not related by blood, marriage or adoption, living together as a single household unit; or
 - c. A family foster home, licensed by the State, or certified by the Adams County Department of Human Services or Adams County Department of Social Services, or a state-licensed child placement agency, and having no more than four (4) foster children, shall also be considered a family.
 - d. A family shall not include more than one (1) person required to register as a sex offender pursuant to Section 18-3-412.5, C.R.S., unless related by blood, marriage or adoption.”
- Federal Heights includes the following definition of family in its zoning code: “Family means a group of persons related by blood, marriage, adoption, living together and, normally but not always, consisting of one or two parents and their children, or persons living together in the relationship and for the purpose of guardian, ward or foster family who may not necessarily be related by blood or marriage to the head of the household, or a group of not more than four unrelated persons living together in a dwelling unit, except that a family shall not, with the exception of adjudicated delinquent children in foster care, include more than one individual, or two more individuals related by blood or marriage, required to register as a sex offender in accordance with state law.”
- Northglenn defines family below:
“Family: A group of persons related by blood, marriage, or adoption, living together and normally, but not always consisting of two parents and their children, or persons living together in the relationship and for the purpose of guardian, ward, or foster family who may not necessarily be related by blood or marriage to the head of the household, or a group of not more than four unrelated persons living together in a dwelling unit, except that a family shall not include more than one individual, or two or more individuals related by blood or marriage, required to register as a sex offender under the provisions of C.R.S. § 18-3-412.5, as amended.”

The other non-entitlement municipalities in Adams do not provide a definition of family.

This definition becomes an item of interest in determining how a jurisdiction administers requests for group homes. Since the group home concept involves sheltering individuals who are not related by birth, marriage or some other legal arrangement, different communities permit group homes with a variety of different regulations. Adams County regulations and those of the non-entitlement municipalities are permissive and generally follow State of Colorado Licensing requirements.

Conclusion: The jurisdictions in Adams County are permissive about allowing group homes or group living facilities. The County and the associated non-entitlement municipalities could provide more detailed guidelines for how they will treat permits for group homes and group living facilities.

6. NEIGHBORHOOD REVITALIZATION: MUNICIPAL AND OTHER SERVICES; EMPLOYMENT, HOUSING

Adams County is transitioning from a rural county with isolated self-contained subdivisions to a high growth area with several of the larger municipalities in the Metro area. The rapid urbanization has placed strains on local governments' ability to maintain services and respond with new infrastructure and government services in a high growth area. The I-25 and I-76 and E-470 corridors have generated many employment opportunities. Residents of Adams County have access to substantial employment and service centers that provide jobs, plentiful shopping and access to medical and other professional services.

Historically, the municipalities and the County have been affordable because they have had a housing stock that was modest in design. As new master planned communities are developed in the County, to take advantage of the auto and light rail infrastructure improvements, higher density and higher cost development has the potential to displace long term, lower income residents. Most of the municipalities, in their comprehensive plans and zoning regulations, have provisions for preserving and improving the older, historic neighborhoods. It will be an ongoing challenge for this stage of the housing/business cycle in the Metro area to maintain the quality of older neighborhoods while at the same time, preserving affordability. New, more aggressive policy actions and plans will be needed in order to maintain some level of affordability in the County housing stock.

Conclusion: The Jurisdictions in Adams County face the same fiscal pressures that other municipalities and Counties in the state are facing. However, they are trying to maintain a steady approach to keeping their communities intact and modestly promoting greater choices in housing and employment for the residents who choose to live and work in Adams County.

7. TRANSPORTATION LINKAGE

The municipalities and the County have been the last to see new mass transit options available in their communities. The northwest Light Rail extension and the DIA extension will provide new opportunities for Transit Oriented Developments close to light rail stations. Adams County also benefits from good highway connections to DIA which will continue to be a major job engine in the Metro Area. Because of this good transit connection, Adams County will continue to see new development which will be built to provide housing for employees of businesses using and supporting DIA.

Conclusion: Future public efforts will need to focus on creating good transit linkages with both highways and bus lines that can move people throughout the County and to the DIA employment corridor. Because there will be substantial numbers of new jobs created in Adams County as DIA continues to expand, there will be an ongoing need for more affordable housing units that the people who are employed in various positions in the DIA corridor can occupy.

8. PUBLIC HOUSING. PUBLIC HOUSING AND OTHER ASSISTED/INSURED HOUSING PROVIDER TENANT SELECTION PROCEDURES; HOUSING CHOICES FOR VOUCHER HOLDERS

The County has four Public Housing Authorities, though the Aurora Housing Authority is not part of this plan. Presently all the Public Housing Authorities have closed waiting lists. In order to preserve their payment standards, the Housing Authorities are not issuing new vouchers in the hope that they will be able to stay within their contracted budget authority.

Both the Adams County and Brighton Housing Authorities manage affordable units in addition to their vouchers. The Housing Authorities both have plans in place to expand the supply of affordable housing within their service areas. The Housing Authorities utilize typical intake and administrative procedures in the operation of their programs. There are no unresolved findings, civil rights or Fair Housing complaints lodged against either Housing Authority.

9. SALE OF SUBSIDIZED HOUSING/DISPLACEMENT

Neither the Brighton Housing Authority nor the Adams County Housing has sold any subsidized housing. Neither Housing Authority serving the relevant communities for the analysis have any plans to sell subsidized housing units. The Brighton Housing Authority is in the process of replacing Public Housing units, but will replace these units at least with a 1:1 ratio.

Conclusion: Impending sale of subsidized housing units in Adams County is not an item of concern at this time.

10. PROPERTY TAX POLICIES:

Property tax policies are set by State Statute. Most residential structures are reappraised every two years so that assessments are based on current market values. Property owners have the ability to protest their property assessments and the protest process includes the first level of protest to be lodged at the County level and ultimately, the property owner can appeal up to the State Board of Assessment Appeals. State Statute also has provisions for partial waivers of property taxes for properties containing units for very low income households, formerly homeless, and frail elderly. These waivers are fairly narrow in scope but do provide an important incentive to assist low income housing providers in keeping their operating expenses lower. By saving dollars on operating expense, owners are able to keep their rents lower than they would be if they had to pay property taxes on all units. Public Housing Authorities have a property tax exemption for their residential properties. The Housing Authority tax exemption has prompted joint ventures between private developers and Housing Authorities. Because the Housing Authority is a part owner of the property, the tax exemption can be obtained. Therefore, units partially owned by a private owner also can attain the benefit of lowering operating expenses by being relieved of the property tax burden.

Conclusion: Colorado Property tax statutes and policies provide for some financial incentives to public and private developers wishing to broaden housing choice for very low income households.

11. 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: ACCD has administered the CDBG and HOME program in compliance with HUD regulations and their own program description and administrative plan. There are currently no Fair Housing Complaints lodged against the County. The Consolidated Plan in force at this time provides for a number of affordable housing activities to broaden Housing Choice within the jurisdiction. Those activities include multi-family rehabilitation, single family rehabilitation, and construction of new rental housing for households below 50% of the AMI. Elderly households and households which have a disability are highlighted as priority beneficiaries of affordable housing programs.

The County adheres to a code of Equal Housing Opportunity for all. There are no policies or plans in place that direct the concentration of affordable housing in areas of high minority concentration. In its Comprehensive Plan and Consolidated Plan, the County encourages the location of new housing that is accessible to jobs, transit and services. The County partners with the Adams County municipalities to expand housing choice through new construction, rehabilitation and the redevelopment of substandard housing and neighborhoods. The County does not support projects that involve displacement of low income minority households. In cases

in which rehabilitation may result in the temporary or permanent displacement of households, relocation benefits are offered in accordance with Uniform Relocation Act.

The County requires that new construction projects and substantial rehabilitation projects comply with Section 504 requirements for accessibility. The County also supports development efforts for new construction and substantial rehabilitation of complexes which can accommodate residents having a variety of accessibility challenges.

Conclusion: The County provides support and effective program management for County-wide efforts to expand Housing Choice and to expand opportunities for low income and minority populations.

PRIVATE SECTOR

FOR-SALE HOUSING

Home Mortgage Disclosure Act (HMDA) Data

Home Mortgage Disclosure Act (HMDA) data is available for loans made on properties in Adams County. This information provides an overview of mortgage lending practices within Adams County in 2012 and 2013. 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.

Data from HMDA was obtained for a total of 35,661 loan applications made in 2013 in Adams County. Of these, 63.3% were for conventional loans, 28.7% for FHA loans, and 7.7% for VA loans. Only 39.6% of loan applications were to purchase a home, while 57.6% were for to refinance a home and 2.8% were to make home improvements. The large number of refinance loans is a reflection of the very low interest rates in 2013.

Loan origination rates ranged from a low of 53.8% for African Americans, to a high of 66.4% for white households. Loan origination rates have increased for African American households since the last AI in 2007, and decreased for Asian and White households. Loan denial rates ranged from a low of 15.3% for Whites, to a high of 23.5% for African Americans. Hispanic households also had a lower loan origination rate than non-Hispanic households, and a higher loan denial rate. Hispanic households have also seen a decline in loan origination rates and increase in denial rates since 2007. Women had origination and denial rates similar to all households in Adams County.

Table 55: Action Taken on Loan by Race, Ethnicity, and Sex Adams County, 2013

Race/Ethnicity	Loan Originated	Loan Not Accepted by Applicant	Loan Denied	Application Withdrawn	File Closed	Total
Race:						
African American	53.8%	5.6%	23.5%	11.3%	5.8%	468
Asian/Pacific Islander	61.7%	5.4%	17.7%	11.2%	4.0%	1,195
White	66.4%	4.4%	15.3%	10.4%	3.4%	22,906
Ethnicity:						
Hispanic/Latino	57.8%	6.3%	22.3%	9.5%	4.2%	5,387
Non-Hispanic	69.5%	4.7%	13.1%	9.7%	3.1%	22,142
Women	63.3%	4.6%	18.2%	10.2%	3.6%	8,229
Total	63.2%	4.7%	17.5%	10.7%	3.9%	29,253

Source: 2013 HMDA Raw Data and CSI

Reasons for the denial of applications are listed on the following table by race, ethnicity, and gender. The most frequent reasons for denial were “debt to income ratio”, “credit history” and “collateral”. There were a total of 3,522 loan denials during 2013. No one racial or ethnic group had higher denial rates in a majority of categories than other groups.

Table 56: Loan Denial Reason by Race, Ethnicity, and Gender Adams County, 2013

	All	White	Black	Asian	Hispanic	Women
Debt-to-Income Ratio	24.5%	23.8%	20.6%	40.3%	24.3%	25.2%
Employment History	1.6%	1.6%	0.0%	3.4%	1.7%	1.2%
Credit History	33.6%	30.8%	45.6%	22.1%	41.6%	33.8%
Collateral	19.5%	20.9%	16.2%	14.1%	16.2%	18.9%
Insufficient Cash	2.8%	3.2%	4.4%	1.3%	2.2%	2.5%
Unverifiable Information	4.5%	5.0%	2.9%	6.7%	3.6%	4.6%
Credit Application Incomplete	13.3%	14.4%	10.3%	12.1%	10.3%	13.7%
Mortgage Insurance Denied	0.1%	0.1%	0.0%	0.0%	0.1%	0.1%
Other	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

Source: 2013 HMDA Raw Data and CSI

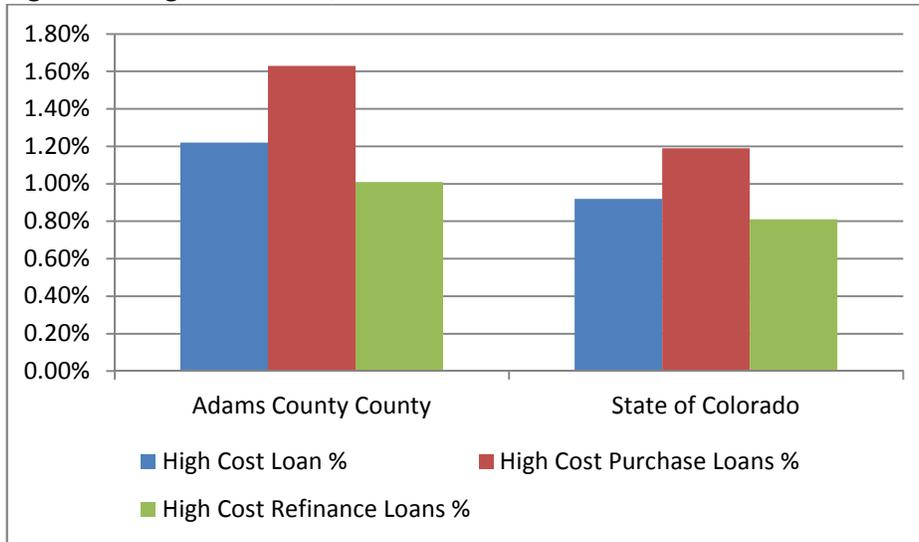
Table 57, below, shows the number of high cost loans in Adams County. The recent national foreclosure crisis illuminated the risks to borrowers who used high cost loans and ended up losing their homes. Risky loan products were targeted to low income households and minorities across the nation. Adams County borrowers across the county had a higher instance of high cost purchase loans, and similar rate of high cost refinance loans, as throughout Colorado.

Table 57: High Cost Loans, 2012

	# of Loans	High Cost Loan %	Purchase Loans	High Cost Purchase Loans %	Refinance Loans	High Cost Refinance Loans %
Adams County	15,920	1.22%	5,267	1.63%	10,653	1.01%
State of Colorado	222,604	0.92%	63,395	1.19%	159,209	0.81%

Source: PolicyMap, HMDA Data

Figure 11: High Cost Loans, 2012



Source: PolicyMap, HMDA Data

The following table shows that African Americans and Hispanics are more likely to borrow using high cost loans to purchase and refinance existing loans.

Table 58: High Cost Loans by Race and Ethnicity, 2012

	Adams County	State of Colorado
High Cost Loans		
Loans to Whites	163	1,728
Percent of all Loans to Whites	1.23%	0.91%
Percent of High Cost Loans	84.02%	84.17%
Loans to African Americans	2	64
Percent of all Loans to African American.	0.85%	1.69%
Percent of High Cost Loans	1.03%	1.32%
Loans to Asians	2	21
Percent of all Loans to Asians	0.38%	0.36%
Percent of High Cost Loans	1.03%	1.02%
Loans to Hispanics	44	1587
Percent of all Loans to Hispanics	1.89%	0.85%
Percent of High Cost Loans	22.68%	77.30%

Source: PolicyMap, HMDA Data

Although HMDA data is not conclusive, it does show that loan originations have a 1.9% under representation from the minority community, especially African American households. Loan denials due to bad credit and debt to income ratios for minorities are an issue that could be solved with increased homebuyer counseling efforts targeted to minority populations and downpayment assistance program loans for these households.

Conclusion: Increased emphasis on homebuyer counseling and efforts to target populations to downpayment assistance programs could help increase the success rate of loan applicants in Adams County. Education for area lenders about Fair Housing laws and practices should be increased, and lending practices should be watched carefully, to ensure that minorities and low income households are fairly treated.

PUBLIC AND PRIVATE SECTOR

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. The Housing Authorities, other local housing organizations and advocates refer housing discrimination complaints to the Colorado Civil Rights Division or to HUD.

INFORMATION PROGRAMS

The Colorado Association of Realtors® and Denver Metro Board of Realtors offer fair housing training classes. Classes are not offered regularly, but are offered periodically. Realtors are required to take this class in order to renew their license.

ADAMS COUNTY REALTOR/LENDER/PROVIDER FAIR HOUSING SURVEY

CSI created and distributed an online survey to collect primary data about the realty and lending practices in Adams County, particularly as they relate to Fair Housing. This electronic survey was distributed to realtors, lenders and local housing services professionals. A total of 31 professionals responded to the survey, including 3 realtors, 2 bankers/lenders, and 22 housing providers/professionals.

A summary of the results of the 13-question survey are summarized below, and detailed responses can be found in Appendix A. Survey results are based upon only complete responses to a particular question.

FAIR HOUSING LAWS

The survey was open to any professional working in residential real estate, lending, or other housing professionals in Adams County. After asking respondents to define their professional affiliation, the survey opened with questions to seek the Fair Housing knowledge of respondents. All respondents answered that they are aware of Fair Housing laws.

FAIR HOUSING TRAINING AND ACTIVITIES

All respondents to the questions regarding fair housing training stated that their workplace provides training. Training is provided to the majority of professionals responding to the survey, and was utilized in the past year by 18 out of the 20 respondents (90%) who answered this question.

Most respondents (80%) reported that they offer Fair Housing information to clients/residents, and inform them of their rights to protection from housing discrimination.

One lender answered that the institution where they work is a participant in Community Reinvestment Act (CRA) activities. The other respondents to this question indicated that this is not applicable to their housing profession.

COMMUNITY PERCEPTIONS

There were 20 responses to each of the two questions that addressed the supply of affordable rental and for-sale housing in Adams County. There were 13 respondents (65%) who stated that they believe that the current supply of both affordable rental housing and for-sale housing in Adams County is low. Only two respondents said they do not believe the supply of for sale affordable housing is low and only four stated they do not believe the supply of affordable rental housing is low. Five respondents said they did not know if the affordable for-sale supply is low and three said they did not know if the affordable rental supply is low.

Sixty percent (60%) of the 20 respondents who provided an opinion about distribution of affordable housing in Adams County think that *it is not* evenly distributed. Six survey takers did not know.

Twelve respondents provided comments reflecting their opinions of the most pressing housing needs in Adams County. The responses indicated several fair housing and affordability concerns:

- “Not having enough rentals available for section 8. Some landlords hear the name sect 8 and turn people away.”
- “Landlords and community managers need more training in fair housing”
- “Inflation in all areas and very little raises or employment for population.”
- “Denying based on race and color. Far too many Hispanics are being denied based on this.”
- “Not enough housing for low-income families. Most people are not educated on fair housing issues.”
- “demand exceeds supply”
- “The market has currently outstripped the ability of many buyers to purchase.”
- “Families that are pushed away because they have kids and the landlord doesn't want to rent to them because of that.”
- “High rental amounts for low to moderate income families”
- “Not enough affordable housing”

LENDING PROGRAMS

Lenders who responded are providing information to borrowers about affordable loan products, downpayment assistance available through the Colorado Housing Assistance Center (CHAC), and the Colorado Housing Finance Authority (CHFA).

SURVEY CONCLUSIONS

Responses allowed for insight into community perceptions and the practices of residential realtors and lenders and other housing services professionals as they relate to Fair Housing. Knowledge of Fair Housing laws are reportedly widely known in the housing industry. Although responses were low from the lending industry, loan programs designed to help lower income and first-time homebuyers appear to be utilized. There were several comments relating to significant need for additional fair housing education and training and several comments indicating that affordability in rental and for-sale housing is a barrier for low and moderate income families in Adams County. Two protected classes (families and the Hispanic community) were specifically mentioned by respondents to the survey as having barriers to Fair Housing in Adams County.

Therefore, promoting Fair Housing classes and programs offered by the Denver Metro Fair Housing Center to nonprofit housing and service providers, realtors and lenders can further Fair Housing

Adams County Colorado Analysis of Impediments to Fair Housing, December 2015
knowledge among those who are in contact with low and moderate, minority, disabled, and members of other population groups protected under Fair Housing laws.

ACTIONS AND PROGRAMS

The County has organized its fair housing programs around expanding housing choice and preserving existing neighborhoods and the single family housing stock within those neighborhoods. In order to meet that goal, the bulk of the County's current fair housing activities exist to address the identified impediments that cause a lack of affordable housing. The County emphasizes infill, preservation and new projects that are served by municipal services.

The County cosponsors and supports the efforts of private fair housing groups which provide a variety of trainings and workshops. The County has worked with the Metro Denver Fair Housing Center, the Northeast Metro Realtor® Association and the Adams County Housing Authority in promoting awareness of Fair Housing Rights and Responsibilities.

The County's new Annual Action Plan proposes that CDBG and HOME funds be used for the following affordable housing activities and housing related public service activities: assisting persons at risk of becoming homeless, eliminating blighting influences and the deterioration of property and facilities, retaining the affordable housing stock, increasing the availability of affordable permanent housing in standard condition to low income and moderate-income families, conserving energy resources and the use of renewable energy sources, providing downpayment assistance for first time homebuyers. Public Service activities and non- housing community development needs include: stabilization and expansion of small business (including micro-businesses), increasing the access to quality public and private facilities, offering the provision of public services concerned with employment, the provision of jobs to low income persons living in areas with high unemployment.

As resources and staff capacity allows, the County will more actively promote the dissemination of Fair Housing Information and provide training to its subgrantees on how to comply with HUD Fair Housing requirements and how to provide understandable Fair Housing information to both consumers and those engaged in the Adams County housing industry.

SECTION SIX: PUBLIC PROCESS

The public process used for this update included several key components. First, information for this report was gathered through research and a series of interviews conducted by CSI with the staff and/or representatives of the participating agencies, organizations, and businesses.

Over 20 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 included in this report. Internet based surveys were used with housing industry lenders and realtors.

CSI held a public hearing to allow the public to comment on the draft Analysis of Impediments to Fair Housing Choice. This public hearing was conducted in accordance with the Adams County Public Participation Plan and notice of the public hearing was posted in local newspapers.

The plan was presented to the Adams County Commissioners at a public hearing on September 15th, 2015 and no individuals other than County staff attended or provided comment on the plan. A study session with the Commissioners was held to discuss the plan on November 3rd at 1:00 pm. A legal notice that the plan was available for public comment was published in local papers on July 22, 2015 and the public was given 30 days to provide comments on the plan. No comments were received. The plan was adopted by the Adams County Commissioners at an additional public hearing held on December 8, 2015. No public comments were received at any meetings.

SECTION SEVEN: CONCLUSIONS AND RECOMMENDATIONS

The impediments to Fair Housing Choice and recommended actions listed below have been identified through the preparation of this report. These impediments are not listed in any particular order of priority. Each action includes a target time period for the action to be undertaken and completed. Some actions are noted as on-going.

2015 IMPEDIMENTS TO FAIR HOUSING CHOICE – ADAMS COUNTY

IMPEDIMENT 1: DEVELOPMENT RELATED FACTORS

Land costs and the associated costs of development including labor, materials and water acquisition costs continue to increase the cost of both multi-family and for sale housing in the County and municipalities. Neighborhood and community opposition to new housing development, particularly multi-family development forces developers to devote more time and resources in responding to neighborhood concerns. The resistance to new development, known as NIMBYISM, often is not based on factors that a single property owner can control.

Action 1A: Adams County will work with County service providers and non-profit agencies to provide educational information and workshops to community organizations to help educate them on who needs affordable housing and how the challenges of development make housing more costly to front line workers, those with disabilities, the elderly, and those experiencing economic and medical challenges. (Ongoing)

Action 1B: Adams County Community Development (ACCD) will work with Community and Economic Development, the Adams County Housing Authority (ACHA) and municipal planning offices to identify parcels that have zoning in place to allow multi-family rental development. The Community Development Division in conjunction with ACHA will maintain an inventory of potential sites and make the list available to developers seeking sites for multi-family housing projects. (Ongoing)

Action 1C: ACCD will cosponsor or promote, with other interested organizations Fair Housing events and trainings to educate both citizens and housing industry concerns on the benefits of having neighborhoods with a diverse housing stock. (Ongoing)

IMPEDIMENT 2: LACK OF DECENT HOUSING UNITS FOR LOW AND VERY LOW INCOME HOUSEHOLDS

Action 2A: The County has prioritized the creation of low and very low income rental housing units as a priority in its Consolidated Plan and Annual Action Plan. (2015-2016)

Action 2B: ACCD will work with affordable housing providers and developers to identify areas of opportunity for development of suitable sites for affordable housing complexes. (Annually)

Action 2C: The County will support affordable rental housing development proposals by investing HOME and CDBG funds in projects that are seeking match dollars from state and federal sources. (Annually)

Action 2D: ACCD will work with service agencies and special needs housing providers to expand the supply of affordable rental units and opportunities for those with special needs such as physical/mental disabilities, frail elderly, and homeless households and those households facing the threat of homelessness. (Annually)

Adams County Colorado Analysis of Impediments to Fair Housing, December 2015

Action 2E: ACCD will work with citizens groups, developers and the Adams County Community and Economic Development Department to address concerns relating to regulatory items that may contribute to increasing the cost of affordable housing development. (Ongoing)

IMPEDIMENT 3: A LACK OF RAPID REHOUSING OPTIONS AND TRANSITIONAL HOUSING

Action 3A: Adams County will continue to work with homeless service and housing providers to expand short term emergency housing options and transitional housing for formerly homeless individuals, Veterans and families. (Ongoing)

Action 3B: Adams County will provide support funding for homeless service agencies providing housing and support services to Adams County residents. (Ongoing)

Action 3C: Adams County will consider funding from both federal and local resources to provide match and support for Adams County agency applications going to HUD under the Super-NOFA process administered through the Metro Denver Continuum of Care. (Annually)

IMPEDIMENT 4: LOCAL GOVERNMENT AND COUNTY REGULATIONS AND FEES CAN BE IMPEDIMENTS IF THOSE ITEMS LIMIT THE SUPPLY OF DECENT, AFFORDABLE HOUSING.

Action 4A: In situations where County fees are necessary, but still create economic impacts on affordable housing projects, the County will consider the use of County resources and federal resources to lessen the fiscal impact of fees on development costs. (Annually)

Action 4B: ACCD will examine the regulatory and fiscal impact of County policies on the cost of affordable housing development. This examination will be incorporated into either an updated Balanced Housing Plan or a Housing Needs Assessment that outlines the approach the County will follow to encourage affordable housing development. (2017-2018)

Action 4C: ACCD will engage the municipalities within the County to achieve greater consistency of affordable housing policies and approaches that could potentially reduce the cost of affordable rental and starter home for-sale development. (2016-2017)

IMPEDIMENT 5: UNDERSTANDABLE FAIR HOUSING INFORMATION IS DIFFICULT TO OBTAIN FOR CONSUMERS, REALTORS®, LENDERS AND OTHER HOUSING PROVIDERS.

Action 5A: ACCD will promote and/or cosponsor Fair Housing Forums and workshops with other organizations to promulgate simple, clear information on Fair Housing Regulations and guidelines for expanding Fair Housing Choice. (Ongoing)

Action 5B: Adams County will maintain contact information for translation service organizations so that if housing providers have a need for translation service for a client or group of clients, the translation service can be obtained in a timely fashion. (Ongoing)

Professional Affiliation

What is your professional affiliation?		
Answer Options	Response Percent	Response Count
Banking/Lending	6.9%	2
Real Estate	10.3%	3
Housing Services	75.9%	22
Other (please specify)	6.9%	2
<i>answered question</i>		29
<i>skipped question</i>		2

Source: Community Strategies Institute

Services Provided

Do you buy/sell real estate, lend or provide housing services in Adams County?		
Answer Options	Response Percent	Response Count
Yes	66.7%	20
No	33.3%	10
<i>answered question</i>		30
<i>skipped question</i>		1

Source: Community Strategies Institute

Fair Housing Knowledge

Are you aware of fair housing law, which states that it is unlawful to discriminate in housing based on a person's race, color, national origin, religion, disability or familial status (families with children under the age of 18 or mothers who are expecting a child)?		
Answer Options	Response Percent	Response Count
Yes	100.0%	30
No	0.0%	0
<i>answered question</i>		30
<i>skipped question</i>		1

Source: Community Strategies Institute

Fair Housing Training Opportunities

Does your place of work provide training opportunities for staff regarding fair housing and fair lending practices?		
Answer Options	Response Percent	Response Count
Yes	100.0%	20
No	0.0%	0
I don't know	0.0%	0
<i>answered question</i>		20
<i>skipped question</i>		11

Source: Community Strategies Institute

Fair Housing Training Participation

Community Strategies Institute

In the past year, have you attended training on fair housing law either offered through your employer or another agency?		
Answer Options	Response Percent	Response Count
Yes	90.0%	18
No	10.0%	2
<i>answered question</i>		20
<i>skipped question</i>		11

Source: Community Strategies Institute

Provision of Fair Housing Information to Clients

Do you explain to your clients, the residents in your housing complex/park/subdivision, or those people who participate in your services about what housing discrimination is and inform them about the laws protecting people from housing discrimination?		
Answer Options	Response Percent	Response Count
Yes	80.0%	16
No	20.0%	4
<i>answered question</i>		20
<i>skipped question</i>		11

Source: Community Strategies Institute

Supply of Affordable Rental Housing

Do you believe the current supply of affordable rental housing is limited within Adams County for people who are in the low to very low income level?		
Answer Options	Response Percent	Response Count
Yes	65.0%	13
No	20.0%	4
I don't know	15.0%	3
<i>answered question</i>		20
<i>skipped question</i>		11

Source: Community Strategies Institute

Supply of Affordable For-Sale Housing

Do you believe the current supply of affordable for-sale housing units limits housing choice within Adams County for people who are in the low to very low income level?		
Answer Options	Response Percent	Response Count
Yes	65.0%	13
No	10.0%	2
I don't know	25.0%	5
<i>answered question</i>		20
<i>skipped question</i>		11

Source: Community Strategies Institute

Geographic Distribution of Low and Moderate Income Households

Do you believe there is an even distribution of low and moderate income households throughout Adams County?		
Answer Options	Response Percent	Response Count
Yes	10.0%	2
No	60.0%	12
I don't know	30.0%	6
answered question		20
skipped question		11

Source: Community Strategies Institute

Most Pressing Fair Housing Issues

In your opinion, what is the most pressing fair housing issue now evident in Adams County?	
Answer Options	Response Count
	12
answered question	12
skipped question	19

Source: Community Strategies Institute

Survey Comments – Pressing Fair Housing Issues

“Not having enough rentals avail for section 8. Some landlords here the name sect 8 and turn people away”.
“Land Lords and community managers needs more training in fair housing”.
“Inflation is all areas and very little raises or employment for population”.
“I do not know”.
“Denying based on race and color. Far too many Hispanics are being denied based on this”.
“Not enough housing for low-income families. Most people are not educated on fair housing issues.”
“Demand exceeds supply”.
“The market has currently outstripped the ability of many buyers to purchase”.
“Families that are pushed away because they have kids and the landlord doesn't want to rent to them because of that”.
“High rent amounts for low to moderate income families”.
“Not enough affordable housing”.

FHA/VA/UHC Loan Program Participation

If you are a lender, do you inform your low and moderate income borrowers about down payment assistance programs such as those offered through the Adams County Housing Authority, Colorado Housing Assistance Corporation (CHAC) or Colorado Housing and Finance Authority (CHFA)?		
Answer Options	Response Percent	Response Count
Yes	11.1%	2
No	0.0%	0
I don't know or not applicable	88.9%	16
answered question		18
skipped question		13

Source: Community Strategies Institute

Homebuyer Workshops/Program Participation

If you are a lender, do you inform your first time homebuyers about homebuyer workshops and programs?		
Answer Options	Response Percent	Response Count
Yes	11.1%	2
No	0.0%	0
I don't know or not applicable	88.9%	16
<i>answered question</i>		18
<i>skipped question</i>		13

Source: Community Strategies Institute

CRA Participation

If you work in the banking industry, does your lending institution participate in community activities under the Community Reinvestment Act (CRA)?		
Answer Options	Response Percent	Response Count
Yes	5.6%	1
No	0.0%	0
I don't know or not applicable	94.4%	17
If yes, please describe the types of CRA activities		0
<i>answered question</i>		18
<i>skipped question</i>		13

Source: Community Strategies Institute

APPENDIX B: PUBLIC HEARING MINUTES

**Adams County Analysis of Impediments to Fair Housing Choice
Public Hearing September 15, 2015 Minutes**

Adams County held a public hearing to provide information about Fair Housing and affordable housing needs in Adams County on September 15, 2015. The meeting was also held to solicit input into Fair Housing Needs. The meeting was advertised according to HUD guidelines and the Adams County Citizen Participation Plan in local newspapers and through contacting interested agencies.

In attendance were:

Joelle Greenland, Manager, Adams County Community Development
Norman Wright, Director, Adams County Community & Economic Development Department
Jennie Rodgers, Community Strategies Institute

No comments were made by the public or providers during this hearing.

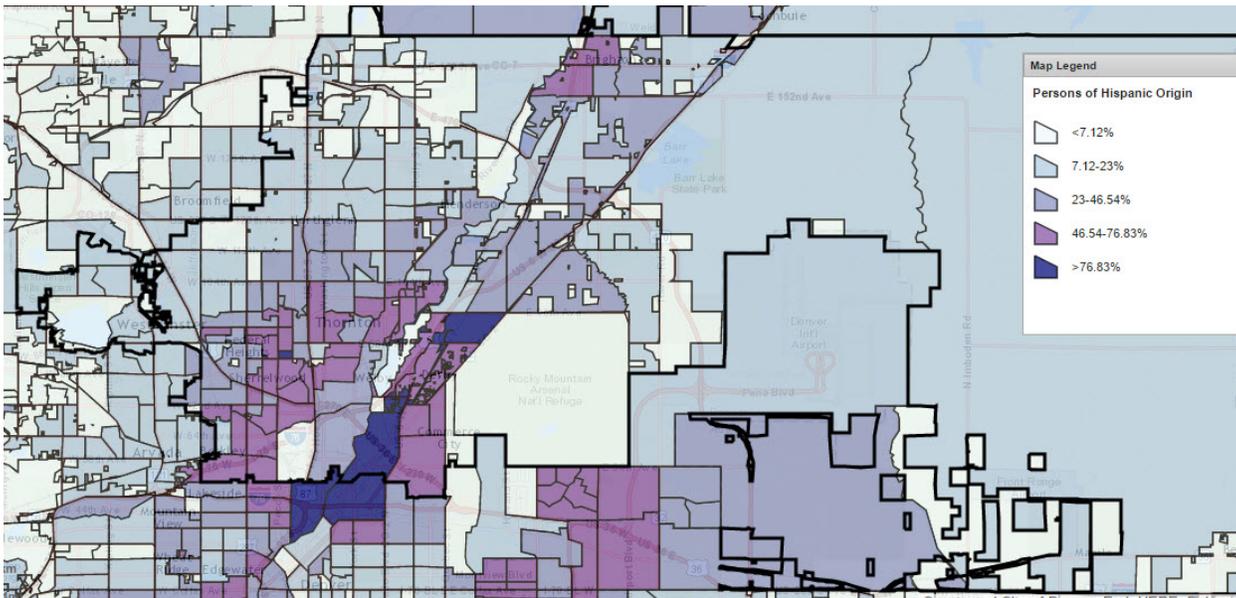
Another public hearing was conducted on December 8th when the plan was adopted by the County Commissioners. No comments were received at this hearing.

In attendance were:

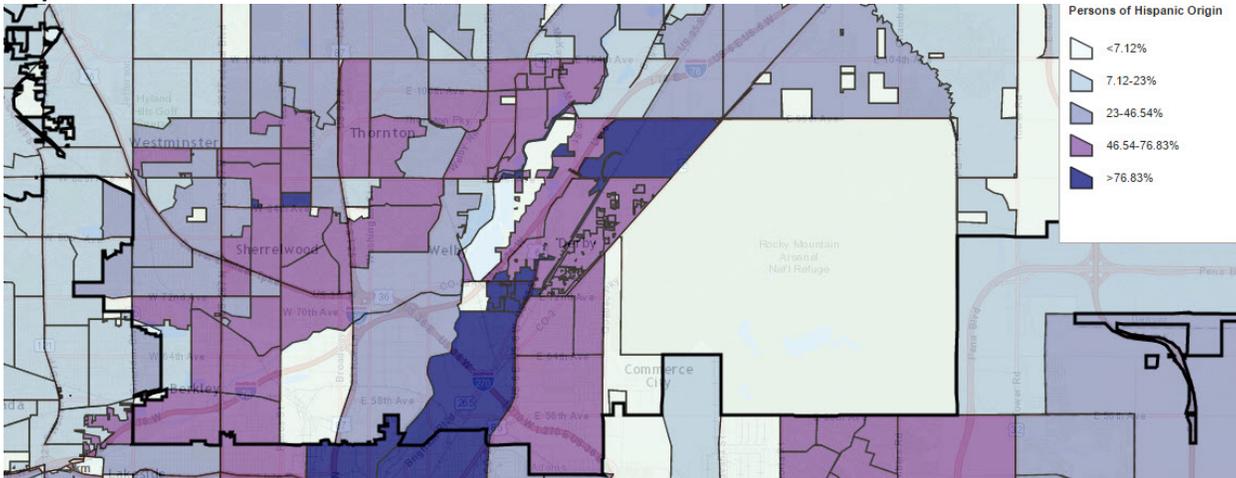
Joelle Greenland, Manager, Adams County Community Development
Norman Wright, Director, Adams County Community & Economic Development Department
Jennie Rodgers, Community Strategies Institute

APPENDIX C: MAPS

Maps #1 – Areas of Minority Concentration, Adams County*

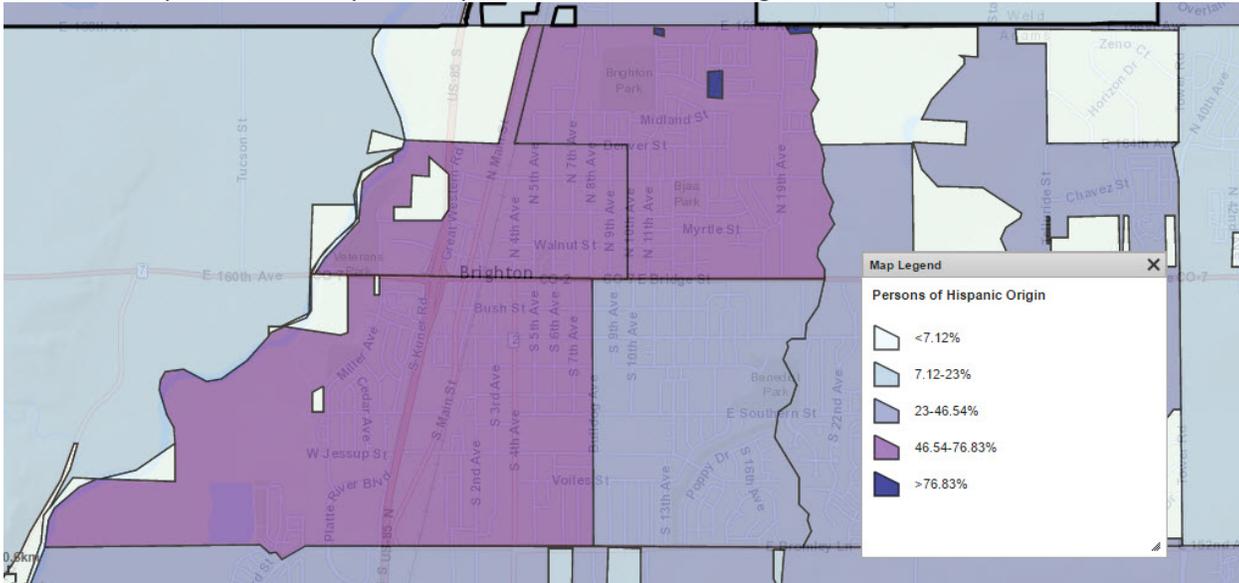


Hispanic and Latino Concentrations



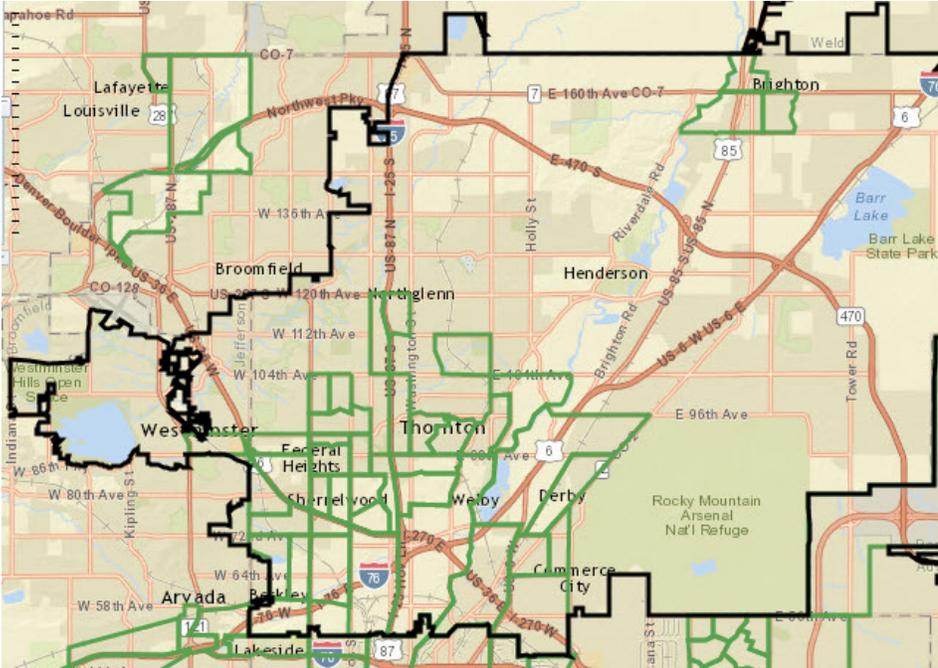
Hispanic and Latino Concentrations, South Adams County

*these maps are created in HUD's CPD Maps data system. All formatting, sizing and shading is created in this system and cannot be changed. The maps are part of the Consolidated Plan, Annual Action Plan and Analysis of Impediments to Fair Housing planning systems created by HUD.

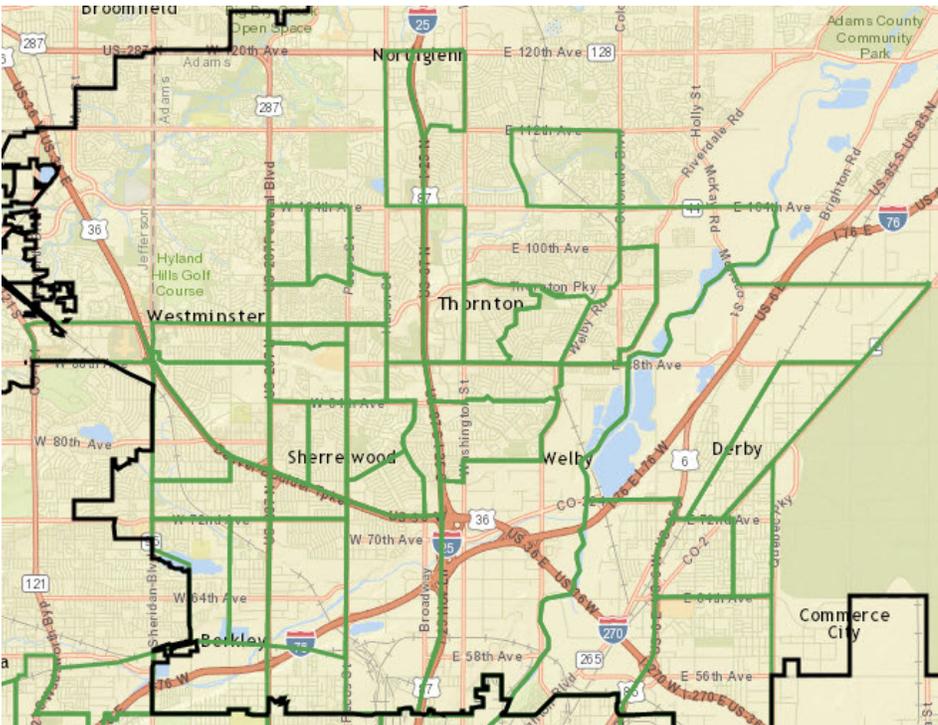


Hispanic Households, Brighton

Adams County Colorado Analysis of Impediments to Fair Housing, December 2015
Maps #2 – Low Income Concentrations, Adams County*

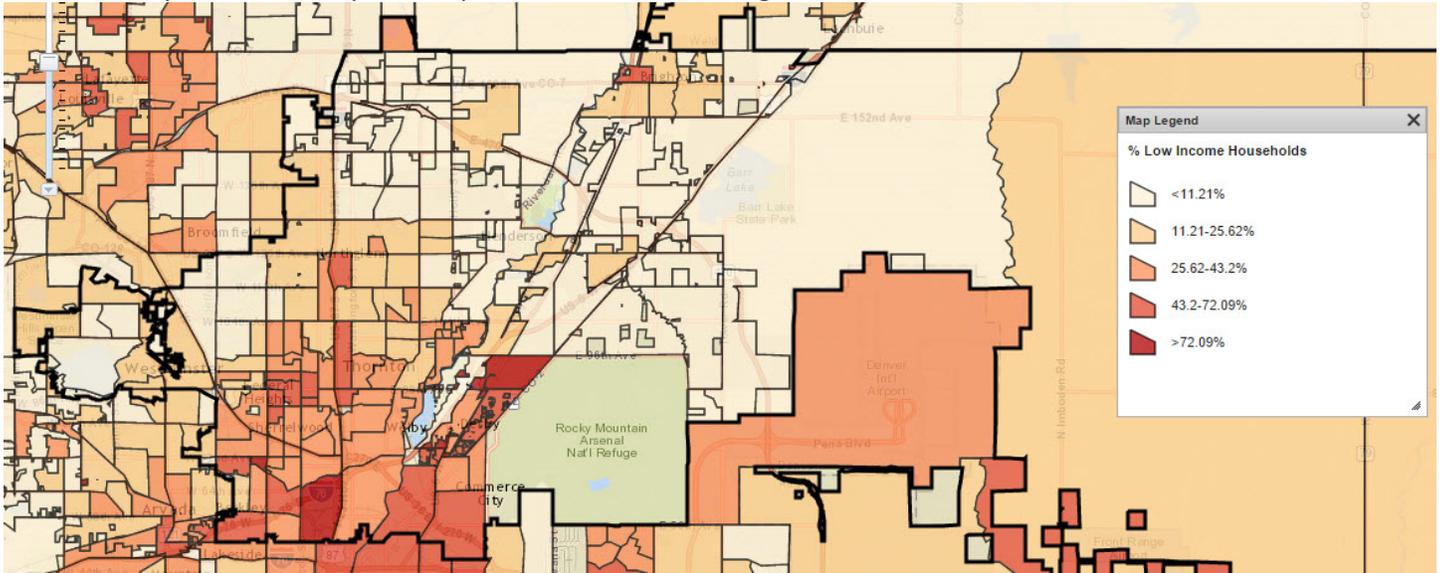


Low and Moderate Income Census Tracts



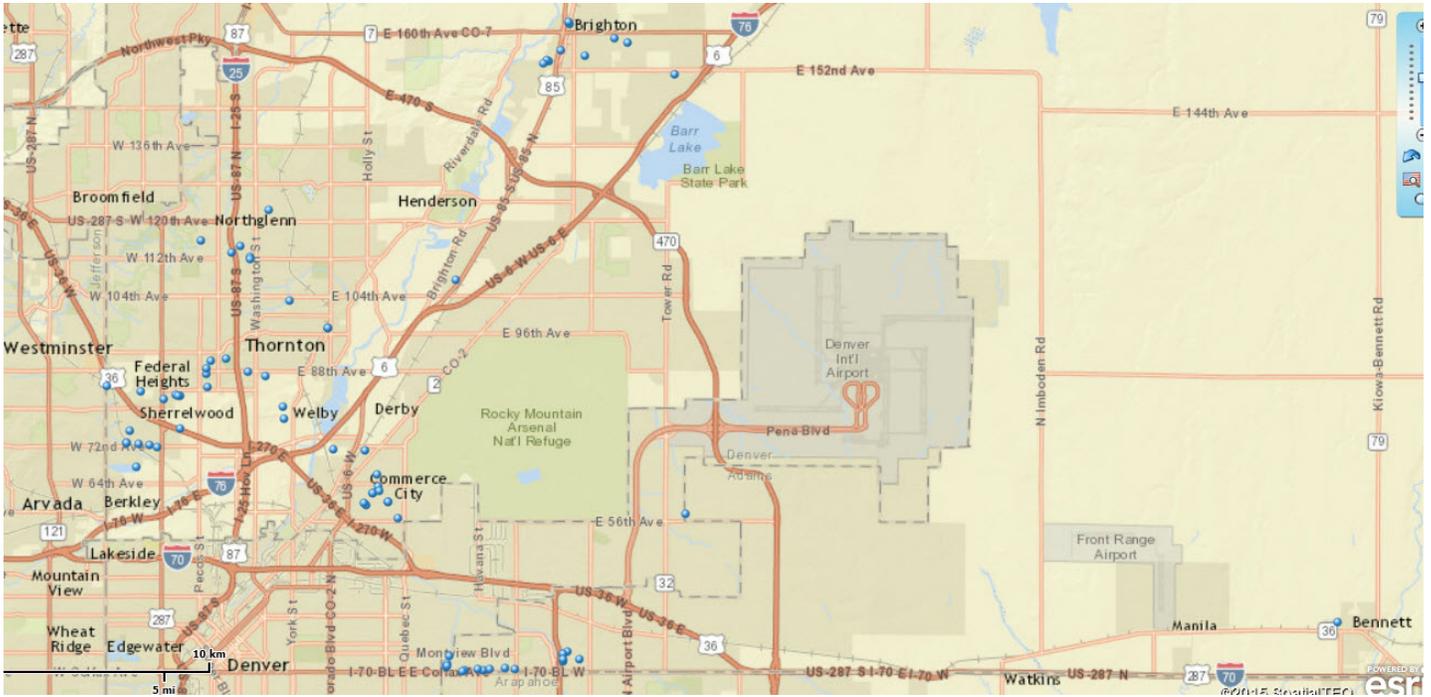
Low and Moderate Income Census Tracts, Southern Adams County

Adams County Colorado Analysis of Impediments to Fair Housing, December 2015



Percent Low Moderate Income Households by Census Tract

Adams County Colorado Analysis of Impediments to Fair Housing, December 2015
Map #3 – Price Restricted Rental Housing Locations, Adams County



All properties, including Bennett

APPENDIX D: PARTICIPATING AGENCIES, ORGANIZATIONS AND BUSINESSES

Governmental:

Joelle Greenland, Adams County Community Development
Stephie Gleason, Adams County Community Development
Adams County Housing Authority

- Don May, Executive Director,
- Jennifer Nelson-Petty, Grants Manager
- Brenda Mascarenes, Director of Housing Programs
- Jim Rakke, Rehabilitation Program
- Sarah Vogl, Director of Development
- David Riggs, Strategic Partnership Manager

Lane Smyth, City of Thornton
Susanna Larson, City of Thornton
Heather Ruddy, City of Westminster
Joseph Espinosa, Brighton Housing Authority

Advocacy/Housing Providers and Industry Representatives:

Sandy Levy, Universal Lending Corporation
Ashley Hudson, Cold Weather Care
Dawn Semmen, Cold Weather Care
Maryellen Carlow, Senior Resource Center
Angela McMahan, Arising Hope
Maritza Gutierrez, 3ce's
Mary Ann Mosquera, Adams 14 Schools
Antonia J. D'Lallo, Adams 12 Schools
Terry Moore, Almost Home
Robin Wolff, CRHDC
Chris Piele, Assist To Sell Realty
Bill Greer, REMAX Alliance
Kristen Miller, A Perfect Location

BOARD OF COUNTY COMMISSIONERS FOR
ADAMS COUNTY, STATE OF COLORADO

RESOLUTION APPROVING ADOPTION OF THE
2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Resolution 2015-483

WHEREAS, Adams County has been designated by the U.S. Department of Housing and Urban Development (HUD) as a HOME, CDBG, and CSBG Program Participating Jurisdiction; and,

WHEREAS, as a Participating Jurisdiction, Adams County receives a program formula allocation from HUD on an annual basis; and,

WHEREAS, HUD requires that Participating Jurisdiction affirmatively further fair housing opportunities including analyzing fair housing impediments; and,

WHEREAS, Adams County has commissioned Community Strategies Institute to prepare the Adams County Analysis of Impediments to Fair Housing Choice study and report; and,

WHEREAS, public review and comment has been completed in accordance with County and HUD policies and regulations.

NOW, THEREFORE, BE IT RESOLVED, by the Board of County Commissioners, County of Adams, State of Colorado, that the 2015 Adams County Analysis of Impediments to Fair Housing Choice, a copy of which is attached hereto, is hereby approved.

Upon motion duly made and seconded the foregoing resolution was adopted by the following vote:

Tedesco	_____	Aye
O'Dorisio	_____	Aye
Henry	_____	Aye
Hansen	_____	Aye
Pawlowski	_____	Aye
Commissioners		

STATE OF COLORADO)
County of Adams)

I, Stan Martin, County Clerk and ex-officio Clerk of the Board of County Commissioners in and for the County and State aforesaid do hereby certify that the annexed and foregoing Order is truly copied from the Records of the Proceedings of the Board of County Commissioners for said Adams County, now in my office.

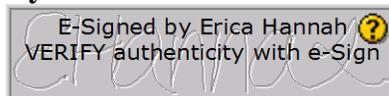
IN WITNESS WHEREOF, I have hereunto set my hand and affixed the seal of said County, at Brighton, Colorado this 24th day of November, A.D. 2015.

County Clerk and ex-officio Clerk of the Board of County Commissioners

Stan Martin:



By:



Deputy