Boulder Broomfield Regional Consortium's

Analysis *of* Impediments *to* FAIR HOUSING CHOICE

including analyses for

City of Boulder, Colorado
City and County of Broomfield, Colorado
City of Longmont, Colorado

Prepared:
January 29, 2015

EQUAL HOUSING OPPORTUNITY

Table of Contents

INTRODUCTION AND EXECUTIVE SUMMARY OF ANALYSIS 4

INTRODUCTION 4
Report Preparer 5
Participation 5
Report Funding 6
Methodology 6
PROGRESS ON ADDRESSING BARRIERS TO FAIR HOUSING 7
EXECUTIVE SUMMARY OF ANALYSIS 10
Fair Housing Impediments 10
Actions to Address Fair Housing Impediments 10

APPENDIX I. PUBLIC INPUT PROCESS 14

PUBLIC INPUT PROCESS 15
Summary of Fair Housing Groups 16
Summary of Online Survey 16

APPENDIX II. DEMOGRAPHIC AND HOUSING PROFILE 30

INTRODUCTION 31
GEOGRAPHIC OVERVIEW 31
DEMOGRAPHICS 35
General Population 35
Race and Ethnicity 35
Hispanic and Non-Hispanic 38
Speak English Less Than "Very Well" 48
Disability 48
Families with Children Ages 18 and Under 49
INCOME 50
Income and Poverty 50
Families and Income 52
Racially and Ethnically Concentrated Area of Poverty 55
EMPLOYMENT 57
Jobs 57
Unemployment 58
Job Access 59
Job Clusters and Transportation Options 60
HOUSING 65
Housing Stock 65
Housing Affordability 67
Housing Accessibility 68
Location of Affordable Market-Rate For-Sale Housing 69
Location of Restricted Affordable Owned Homes 70
Location of Restricted Affordable Rental Housing 71
Efforts to Enhance Access in Boulder and Broomfield Counties 73
Supportive Housing for Those Transitioning Out of Institutional Settings 73
Housing, Income and Access to Quality Public Schools 75
Housing and Environmental Conditions 78

APPENDIX III. POLICIES AND PRACTICES IMPACTING FAIR HOUSING CHOICE.....79

CITY OF BOULDER.....80
CITY AND COUNTY OF BROOMFIELD.....93
CITY OF LONGMONT.....98
BOULDER COUNTY.....116
PUBLIC HOUSING AUTHORITIES.....125
BOULDER AND BROOMFIELD COUNTY PROPERTY TAX PRACTICES.....133

APPENDIX IV. PRIVATE PRACTICES IMPACTING FAIR HOUSING.....134

INTRODUCTION.....135
HOME LENDING.....135
DENVER METRO AREA FAIR HOUSING CENTER RENTAL DISCRIMINATION STUDY.....139

APPENDIX V. FAIR HOUSING ACTIVITIES.....140

INTRODUCTION.....141
CITY OF BOULDER OFFICE HUMAN RIGHTS.....141
CITY OF LONGMONT COMMUNITY AND NEIGHBORHOOD RELATIONS.....141

Jurisdiction Name: Boulder Broomfield Regional Consortium, including City of Boulder, City and County of Broomfield and City of Longmont

Date: December 12, 2014

Introduction

The U.S. Department of Housing and Urban Development Office of Fair Housing and Equal Opportunity (HUD FHEO) works to ensure that all Americans have equal access to the housing of their choice. The Fair Housing Act, adopted in 1968 and since amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status and disability.

To support a community's commitment to Fair Housing, HUD requires jurisdictions that receive federal funding, such as HOME Investment Partnership Program (HOME) funds and Community Development Block Grant (CDBG) funds, to conduct an Analysis of Impediments to Fair Housing Choice (AI) as a basis for non-discriminatory housing planning within their community. The AI provides a comprehensive review of specific regulatory and programmatic barriers that restrict, or have the effect of restricting, the availability of housing choices for residents based on the protected classes listed above (and others, as determined by each jurisdiction) and sets plans to eliminate those barriers and enforce compliance through regulatory practices. Examples of common barriers include housing discrimination, unfair lending practices, lack of Fair Housing education and resources for residents, local jurisdiction zoning requirements, and lack of housing units to serve various household sizes and persons with disabilities within the community.

HUD has set the following four overarching goals that are expected to be met from this nationwide effort to affirmatively further Fair Housing:

1. Reduce segregation, and build on the nation's increasing racial, geographic and economic diversity.
2. Eliminate racially and ethnically concentrated areas of poverty.
3. Reduce disparities in access to important community assets such as quality schools, job centers, and transit.
4. Narrow gaps that leave families with children, people with disabilities, and people of different races, colors and national origins with more severe housing problems, a.k.a., disproportionate housing needs.

The Consortium, a federally-funded partnership, is required to submit this AI for the regional area as a whole and for each CDBG Entitlement Community (receiving an annual allocation of CDBG funding) within the group, which includes Boulder, Longmont, and Broomfield. For that reason, this AI will

provide information and data Consortium-wide and also specifically for those three jurisdictions; Boulder County, the only jurisdiction within the Consortium that does not receive CDBG funding, will not have a separate focus, but its information will be incorporated within the Consortium-wide AI.

Irrespective of funding requirements, the Consortium is committed to supporting and promoting housing programs and projects that are inclusive and do not discriminate against residents based on protected classes identified through the Fair Housing Act. We pride ourselves on being a region of acceptance and diversity, and do not tolerate discriminatory practices from any agencies and programs that we financially support.

Report Preparer

This Analysis of Impediments to Fair Housing was prepared in a collaborative process by local and county government staff, including

- City of Boulder (Kristin Hyser, Community Investment Program Manager; Crystal Launder, Housing Planner; Shelly Conley, Compliance and Project Manager)
- Boulder County (Leslie Gibson, Housing Program Specialist and Ian Swallow, Housing Development Planner)
- City of Longmont (Kathy Fedler, Housing and Community Investment Manager; Janet Fulton, Housing and Community Investment Program Specialist)
- City and County of Broomfield (Cheryl St. Clair, Manager of Housing Programs and Housing Authority)

Participation

In preparing this report, the Consortium Partners sought participation through several methods.

Focus Groups

Two focus groups were held – one in Boulder and one in Longmont – to explore the on-the-ground experience of impediments to fair housing facing protected classes. Invitations to participate were sent to 33 organizations. Participants included individuals who work for agencies serving protected classes, advocates for protective classes and representatives from the housing industry (housing providers, property managers, realtors).

Online Survey

An online survey was distributed to 123 agencies in the Boulder/Broomfield/Longmont areas. Agencies included local housing authorities, housing providers and programs, real estate agencies, mortgage companies, service agencies and nonprofits serving protected classes. Twenty-six responses were received – a 21% response rate.

Collaboration with Public Housing Authorities and Affordable Housing Providers

Three public housing authorities operate in the Consortium area, Boulder Housing Partners, Boulder County Housing Authority and Longmont Housing Authority. All were consulted in the preparation of this document.

Report Funding

Staff from the Participating Jurisdictions and Boulder County prepared this report on staff time. Focus groups were conducted in free venues. No additional funds were expended in the preparation of this report.

Methodology

The preparation of this report was guided by the Fair Housing Planning Guide issued by HUD's Office of Fair Housing and Equal Opportunity and to a lesser extent the Proposed Rule Background Materials and Geospatial Tool (http://www.huduser.org/portal/affht_pt.html).

This analysis was based primarily on existing data sources for the quantitative component, informed by qualitative information gathered through two focus groups, the online survey and information collected from our housing authorities. Quantitative data sources included:

1. HUDCPD maps
2. City and county staff and policy and regulation documents
3. Denver Regional Equity Atlas
4. American Community Survey, 2012 5-year estimates
5. Affirmatively Furthering Fair Housing Mapping Tool
6. American Housing Survey, 2011
7. Boulder Valley School District Enrollment Map
8. St. Vrain Valley School District Enrollment Map
9. The Tax Foundation website
10. HDMA data, 2013
11. Denver Metro Area Fair Housing Center Rental Discrimination Study 2014
12. BBC Research and Consulting-prepared Market Analysis for City of Boulder, July 2013

Progress on Addressing Barriers to Fair Housing

Since the previous Analysis of Impediments to Fair Housing was published, the Consortium has taken a number of steps to further fair housing and overcome the effects of previously-identified impediments to housing choice. The Consortium has since received technical assistance from the Office of Federal Housing Enterprise Oversight (OFHEO) to continue to identify and analyze barriers for this Analysis.

Each jurisdiction's section in this document details efforts to promote fair housing within their purview. The following are some examples of action taken Consortium-wide:

- A review of beneficiary demographics indicates that non white persons, with the exception of Asians, and Hispanics are receiving proportionally more services than their prevalence in the general population, based on Consortium-wide funding.

		2013 CDBG Beneficiaries by Racial/Ethnic Category = 4,014			
Race	**% General Population**	**# Persons**	**% by Race**	**# Hispanic**	**% by Race**
White	87.7%	4,007	100%	2,073	51.7%
Black/African American	0.9%	89	2.2%	0	0%
Asian	4.2%	110	2.7%	0	0%
American Indian/Alaska Native	0.4%	29	0.7%	0	0%
Native Hawaiian/Other Pacific Islander	0.0%	3	0.1%	0	0%
Other Multi-Racial	3.0%	264	6.6%	2	0%
Total Number Served		**4,007**		**2,075**	**0%**

Source: Consortium, 2013

	2013 HOME Beneficiaries by Racial/Ethnic Category = 46			
	# Persons	**% by Race**	**# Hispanic**	**% by Race**
White	46	82%	7	13%
Black/African American	6	11%	0	0%
Asian	1	2%	0	0%
American Indian/Alaska Native	1	2%	0	0%
Native Hawaiian/Other Pacific Islander	1	2%	1	2%
Other Multi-Racial	2	4%	2	4%
Total Number Served	**56**		**10**	

Source: Consortium, 2013

- The City of Boulder transferred its Architectural Barrier Removal Program (providing accessibility modifications) to the region-wide rehabilitation program operated by Longs Peak Energy Conservation, Boulder County's division addressing energy conservation and housing rehabilitation. $60,000 in CDBG funds was allocated to support this program.
- The City of Boulder continues to support the development of accessible rental units to serve seniors and/or persons with disabilities.

  - High Mar, developed by Boulder Housing Partners offers 59 one and two bedroom apartments serving people 55+ and includes the following accessibility features: 9 fully accessible units; 50 adaptable units; 2 sensory accessible units; accessible common room areas and restrooms; and the building features an elevator.
  - Lee Hill, a Housing First Community developed by Boulder Housing Partners offers 31 one bedroom apartments for people experiencing chronic homelessness and includes the following accessibility features: 2 fully accessible units; 1 sensory accessible unit; accessible common room areas and restrooms.
  - Across four properties owned and operated by Thistle Properties, 26 fully accessible units are available.

- City of Boulder continues to use its Community Development Block Grant (CDBG) funds to support the capital improvements of local nonprofit organizations serving low and moderate income households including the provision of accessibility features including: installation of ADA accessible doors, ramps and elevators.
- City of Boulder supported Boulder County Housing and Community Education Program and Colorado Enterprise Fund to expand their outreach efforts to ensure racial, geographic and economic diversity.
- Boulder County, through its Housing Authority (BCHA), has increased development of rental units that exceed the accessibility and visitability requirements to serve more people who are elderly and/or have a disability. Josephine Commons, a 74 unit senior apartment complex which was completed in 2012, includes zero-step entryways, wider doorways, grab bars in all bathrooms, and roll-in shower stalls. The apartment complex was fully leased up prior to the end of construction. BCHA is currently in the completion stages of a new mixed family development, which will include the construction of 72 new family units at the Josephine Commons site, and the rehabilitation of 95 scattered units throughout Lafayette. The same accommodations will be made, as appropriate, within this second phase.
- Over a four-year time period, Longmont Christian Housing received federal funding from the City of Longmont for their St. Vrain Manor Apartment site to convert all bathtubs into walk-in showers to remove mobility impairments. St. Vrain Manor is a 73-unit apartment complex for low-income senior citizens capable of independent living.
- The City of Longmont provided CDBG funding to the Longmont Housing Authority for the property leased to the Center for People with Disabilities. The Center provides services to persons with disabilities to improve their independence through access to transportation, housing and employment. Two ADA compliant entrance doors, with automatic openers, were installed to improve accessibility to the building.
- The City of Longmont funded Longmont Housing Authority (LHA) to acquire and rehabilitate The Suites, providing housing to person with physical and mental disabilities. Four units are ADA accessible. LHA is raising funds to refinance and rehabilitate the property. It is likely that more ADA accessible units will be added during the remodel.

- Longmont Housing Authority added 100 affordable housing units for elderly, all are visitable and a portion are ADA accessible.
- The City of Longmont has operated an Architectural Barriers Removal program since it first became and entitlement community. In 2014, $51,000 was granted to homeowners for renovations to remove architectural barriers, allowing people to remain in their homes.
- The City of Longmont declared April 2012 Fair Housing Month in Longmont and distributed "The Fair Housing Five," a children's book that tells the story of kids who take action in their neighborhood in response to a landlord who is treating people unfairly. This book, developed by the Greater New Orleans Fair Housing Action Center, was given to City Council, Department Directors, Public Library staff, local school district's libraries, and housing advocates.
- All jurisdictions continue to fund financial literacy programs developed and conducted by the Boulder County Housing and Community Education Program.
- In Boulder County, as in the City of Boulder, the review of beneficiary demographics for some of the major programs indicates that protected classes are receiving proportionally greater services than their prevalence in the general population. In Boulder County, the total number of Weatherization Jobs completed for calendar year 2012 shows that the County is reaching out to people with disabilities in proportions higher than the total population. In 2012, 23% of the total 449 weatherization jobs completed in 2012 were households of people who have disabilities. Another 30% of households served were elderly over 65 years old.
- City of Boulder staff, along with several agencies, developed a formal Affirmative Fair Housing Marketing Plan (AFHMP). City staff provided training for new property managers to ensure their understanding of Fair Housing and the AFHMP requirement. Golden West Manor, a senior apartment building, and Boulder Housing Partners, the Housing Authority of the City of Boulder, are in the process of completing the process for approval of their AFHMP. The City uses CDBG and HOME administrative funds to support the monitoring staff.
- The City of Longmont organized resident meetings in a mobile home community that was dealing with cultural conflict because of changes in demographics where newer residents were Latino with some primarily Spanish speaking residents. Education was provided on conflict resolution and Fair Housing with an emphasis on the protected class of national origin.
- Boulder County, with representatives from the cities of Boulder and Longmont and more than 13 community agencies, conducts monthly Landlord and Community Relations educational sessions. These workshops cover Fair Housing laws and compliance in addition to topics such as service & companion animals, immigration and special needs. These monthly workshops average an attendance of about 30 local landlords and property managers.
- Longmont Bilingual staff brought resources and education on landlord-tenant, Fair Housing and community resources during neighborhood outreach in the Midtown Neighborhoods which has a high concentration of low/moderate income and Latino residents that are monolingual Spanish speakers.

Executive Summary of Analysis

Below we begin with a list of impediments to fair housing identified in the Boulder Broomfield Regional Consortium Area followed by a list of action steps that will be undertaken either collaboratively, if appropriate, or jurisdictionally.

Fair Housing Impediments

The following is a list of Fair Housing impediments found in the Boulder/Broomfield area. Unless indicated otherwise, these issues exist across all jurisdictions.

All Jurisdictions

1. ***Inadequate supply of accessible housing***. Data indicate accessibility features in the Denver MSA housing stock, the nearest MSA for which these data are available, are underutilized and the Architectural Barrier Removal Program is underutilized. Advocates for seniors and the disabled report there is strong demand for more accessible housing. Additionally, as demographics shift and the baby boom generation ages, the communities in Boulder and Broomfield County will need more accessible rental and homeownership options to meet growing demand and avoid displacement.
2. ***Housing supply does not meet the needs of families***. Though 60.7 percent of the housing stock in the Consortium area has three or more bedrooms, Longmont focus group attendees reported that there is an inadequate supply of housing available to families. Broomfield city staff agree that this is an issue in Broomfield. The City of Boulder is in the process of preparing a Comprehensive Housing Strategy, which has explored this issue as well. The issue may not be the availability of 3+ bedroom housing for families, but instead the affordability, design and quality of that housing and competition with students and other groups of people who can afford higher rents. Further exploration is needed to identify how to best expand housing opportunity for families in the Consortium area.
3. ***Housing Choice Voucher holders struggle to use their vouchers on the private market.*** While source of income is not a protected class, Boulder Housing Partners places priority on families with children and disabled persons in their HCV lotteries. Boulder County Housing Authority provides preference to families with children, the elderly and disabled in their Housing Choice Voucher Admin Plan. At the same time, it is challenging to use Housing Choice Vouchers in the Boulder/Broomfield market because there is an unaddressed gap between Fair Market Rent and the actual market rent in this area. Inspection requirements and the perception that HCV holders have all of the power in the tenant/landlord dynamic and landlords will lose out, along with the fact that landlords can demand “credit worthy” tenants also leads to an inability to secure housing with HCVs on the open market which disproportionately impacts protected classes.

4. ***High loan denial rates among racial minorities and those of Hispanic origin.*** According to Home Mortgage Disclosure Act (HMDA) data, the rates of loan denial are much higher for Hispanic, Black or African American, Native Hawaiian and Pacific Islander and Native American applicants compared to white non-Hispanic applicants.
5. ***Market-Rate Rental Discrimination by Race, Familial Status and National Origin.*** The Denver Metro Fair Housing Center published a study in February 2014 that found high rates of discrimination against protected classes. This study was not specific to the Boulder/Broomfield market; however it was geographically close enough to assume that similar practices are happening in this area. The types of discrimination observed included steering, presenting fewer options to protected class testers, additional scrutiny of protected class testers, discouraging statements to protected class testers, not discussing special offers with protected class testers, offering higher prices on the same unit to protected class tester, and providing less information to protected class testers.

Actions to Address Impediments

Each community has identified Action Steps (below) to address the impediments identified above.

All Jurisdictions

Action Step. Market-rate rental discrimination. Jurisdictions continue to engage with and support the Boulder County Landlord and Community Relations group to identify opportunities to provide fair housing education to market-rate rental properties.

City of Boulder

Action Step. Update the Comprehensive Housing Strategy. The 2014-15 update to the city's Comprehensive Housing Study is exploring a number of tools that could expand housing choice and affordability, including options to increase housing accessibility, exploring ways to increase the utility of Housing Choice Vouchers, considering revisiting the city's occupancy limit, and exploring the needs and desires of in-commuters, including those with families who wish to live in Boulder. In the fourth quarter 2014 through mid-year 2015 a broad public outreach process will unfold to engage the community to identify options to expand housing opportunity in Boulder. This work will inform the city's five-year work plan related to housing.

Action Step. Boulder Valley Comprehensive Plan Update. The 2015 update to the BVCP will be prepared in partnership with Boulder County and is anticipated to take between 18 and 24 months. The BVCP contains policies to address community well being and diverse needs of people with different ethnicities, cultures, abilities, ages, and income. It also addresses housing and human services. The process to develop the plan engages a broad segment of the community for input and

how to engage all community members. The Resilience Strategy in its multifaceted definition will be inclusive and address health and wellbeing and needs of under-represented populations.

Action Step. Increase Fair Housing Information Sharing. Increase the interaction and the information sharing between city Housing staff, housing and service providers and the City of Boulder Human Relations Commission to stay apprised of fair housing issues and trends brought to the attention of the Commission. Proactively develop strategies and programming to address concerns/occurrences of possible fair housing discrimination or limited access to housing choice.

Action Step. Increase Efficacy of Architectural Barrier Removal Program. Analyze effective of Architectural Barrier Removal Program (providing accessibility modifications). Is it reaching those in need? Continue to support and increase marketing of program ensuring expanded outreach and access to seniors and persons with disabilities.

Action Step. Increase Fair Housing Information on the City's Website. City of Boulder's website will include a fair housing page with basic info and links to HUD, City of Boulder Human Relations Commission, and other local fair housing resources.

City and County of Broomfield

Action Step. Ten-Year Comprehensive Plan Update. Broomfield will be updating the City's 10 year Comprehensive Plan in 2015. There will be a focus on various housing issues; how to address unmet needs of larger family unit inventory, the increasing need for accessible housing modifications for the aging population, possible incentives to private developers to build or rehabilitate while keeping the housing affordable. This is a priority given that there is not a housing choice voucher program in Broomfield and the one subsidized rental project for seniors has a two year waitlist. There will also be a discussion of strategies around new transit stations and the encouragement to develop a variety of housing options near those stations. The Plan may also explore ways to educate the privately owned property management companies on Fair Housing issues in conjunction with the other Consortium members.

City of Longmont

One of the largest impediments to fair housing choice is the lack of housing inventory.

Action Step. Prioritize financial assistance to 40% AMI and below restricted rental housing, homeless housing and special needs housing including accessible housing: *The* City of Longmont will increase the amount and the affordability of rental housing available in the City by prioritizing its financial assistance to projects that preserve existing and provide additional rental housing affordable to households/persons at or below 40% of the Area Median Income in addition to homeless households and those with special needs. It will especially support projects that increase the supply of accessible housing.

Action Step. Fund and strengthen programs that support low-income homeowners. The City of Longmont will work to fund and strengthen programs that support existing homeowners to improve the Consortium's existing housing stock so that low-income homeowners are able to adequately maintain their homes, continue to afford their housing, and age in place. The basis for this prioritization is the need to provide resources and options to low-income homeowners to maintain and preserve their housing. Many homes in the community were impacted by the September 2013 flood and are in need of repairs. Mobile homes continue to deteriorate and are no longer decent, safe and sanitary. The architectural barriers removal program is vital to keep aging and disabled people in their homes allowing them to age in place.

Action Step. Update Comprehensive Plan. The City of Longmont is reviewing and updating the Longmont Area Comprehensive Plan, and will ensure that no protected classes are negatively impacted, directly or indirectly by its land use, planning and/or zoning policies.

Appendix I. Public Input Process

Summary of Fair Housing Focus Groups

Summary of Online Survey

Public Input Process

The Boulder Broomfield Regional Consortium engaged the public in the development of the Analysis of Impediments to Fair Housing Choice through the facilitation of two focus groups and the implementation of an online survey.

FOCUS GROUPS

The Boulder Broomfield Regional Consortium facilitated two focus groups to explore housing, economic and transportation conditions, as well as public and private sector policies to ensure that housing choices and opportunities in our community are available for all persons. Participants included individuals who work for agencies serving protected classes, advocates for protective classes and representatives from the housing industry (housing providers, property managers, realtors). Invitations were sent to the following organizations:

Attention Homes
Boulder County Aging Services
Boulder County Aging Advisory Council
Boulder County Community Services
Boulder County Housing Authority
Boulder County Legal Services
Boulder Housing Partners
Boulder Shelter for the Homeless
Broomfield Health and Human Services
Broomfield Tenant Based Rental Assistance
Center for People with Disabilities
Centro Amistad
City of Boulder Human Relations Commission
City of Boulder Community Mediation Services
City of Longmont, Community and Neighborhood Resources
City of Longmont, Community Services
City of Longmont District Attorney's Office
Community Action
City of Longmont, Senior Services
El Comite
Emergency Family Assistance Association
Immigrant Legal Center
Intercambio
Landlord Tenant Relations Council
League of Women Voters
Lenders
Longmont Housing Authority
Longmont Area Realtor's Association
Mental Health Partners of Boulder County
Realtors
Safehouse Progressive Alliance for Nonviolence
The Inn Between
The OUR Center
Thistle Communities
Veterans Helping Veterans Now

Two focus groups were facilitated by City of Boulder Division of Housing staff. On June 11, 2014 an hour long focus group was held in Boulder, Colorado in the resident room of Red Oak Park, an affordable rental community owned and managed by Boulder Housing Partners (Boulder/Broomfield Focus Group). On June 12, 2014, a 90-minute focus group was held in Longmont, Colorado in a community room of the Longmont Public Library (Longmont Focus Group). These two locations were selected to accommodate the location of the participants. The length of the meeting varied because the participants in Longmont chose to include a 15 minute break.

Each group was facilitated by a City of Boulder Division of Housing staff member. The facilitator used the same script and series of questions for each group. Information was collected by a scribe in attendance and as well as tape recorded. To facilitate an open and candid conversation, participants were told that no identifying information would be included in the published report. Therefore the names and job titles of participants have not been included in the document.

The Boulder/Broomfield Focus Group consisted of nine participants, six women and three men. Participants represented several interested parties including: City and County of Broomfield, Boulder Shelter for the Homeless, City of Boulder Community Mediation Services, City of Boulder Human Relations Commission, Safehouse Progressive Alliance for Nonviolence, Broomfield Health and Human Services, Boulder County Housing Authority, Intercambio, Boulder County Aging Advisory Council.

The Longmont Focus Group consisted of eight participants, all women. Participants represented several interested parties including: Inn Between, City of Longmont (two representatives), OUR Center, Longmont Association of Realtors, City of Longmont District Attorney's Office Community Action, and League of Women Voters.

ONLINE SURVEY

An online survey was distributed to 123 agencies in the Boulder/Broomfield/Longmont region. Agencies included local housing authorities, housing providers and programs, real estate agencies, mortgage companies, service agencies and nonprofits serving protected classes. Twenty-six responses were received – a 21% response rate.

Summary of Fair Housing Focus Groups

Each focus group followed the same script and series of eleven pre-selected questions. However the group was facilitated to allow open discussion. While the information collected is anecdotal, four themes were shared among both groups indicating a matter of concern in the Boulder County/Broomfield County region. These include:

- Rather than identifying overt discriminatory practices, the participants identify the current economic reality and low vacancy rates in the region as the main impediment. The lack of affordability was further exacerbated by the 2013 flood event that impacted the community creating hundreds of people in Boulder County needing replacement housing.

- The focus groups also identified landlords opting to not rent to voucher holders as an impediment to accessing housing. Given that the fair market rates for the region, which set the voucher value, are not competing with the current market rents, voucher users cannot compete in this climate. This is further exacerbated by any criteria that might work against a person seeking housing (e.g. lack of a social security number, low credit score, criminal history, shelter history, minor dependents).

- The group also identified a lack of accessible units to house seniors or persons with disabilities.

- There is a lack of awareness and education regarding affirmatively furthering fair housing with both groups identifying a need and opportunity to expand education and training for renters, landlords and buyers.

Discussion Question #1: *Do you think there is enough housing in Boulder County or Broomfield County that is affordable to all types of people? If not, what is missing?*

Responses from Boulder/Broomfield Focus Group: There was general consensus among the group that there is not enough housing for low or middle income persons. This general lack of decent and affordable housing stock was increased by the 2013 flood event. There was a great deal of discussion around the reality of the current economic climate and landlords electing to not rent to voucher users. The group asserted that this is due to landlords being able to charge rents higher than those allowable for Housing Choice Voucher users and landlords "tired of dealing with low income people because they do not take care of the units". The missing inventory identified included: units accepting Housing Choice Vouchers, units meeting the needs of aging persons or people with disabilities on fixed incomes.

Responses from Longmont Focus Group: Participants stated that there is not enough housing. The group identified housing options are lacking for persons with the custody of a minor child, undocumented immigrants, persons with a criminal history, seniors or persons with disabilities needing accessible accommodations. The Longmont participants echoed the growing number of landlords not accepting Housing Choice vouchers.

Discussion Question #2: *Does the available housing stock match the current needs of the community? For example, size, type (family or seniors), accessibility.*

Responses from Boulder/Broomfield Focus Group: One participant discussed the changing demography of Boulder over the last fifteen years with the influx of more affluent residents eroding the diversity of the community and the number of families able to afford to live in Boulder. As discussed above, the group identified the lack of housing stock to meet demand by the following populations: units affordable and available to low income residents, units affordable to seniors on fixed incomes, and accessible units serving seniors and persons with disabilities. It was also noted that the trend in new construction for building rental and single family detached rather than the more affordable option of for sale attached (condos, townhomes), further limits for sale options for moderate and middle income buyers.

Responses from Longmont Focus Group: Participants identified the following unmet housing needs: units affordable and available to low income residents, units that can accommodate families (appropriate number of bedrooms), accessible units serving seniors and persons with disabilities, pet-friendly rental units.

Discussion Question #3: *Do you believe that significant impediments/barriers to fair housing exist in Boulder County and Broomfield? Name the factors that are potential barriers to individuals looking to buy or rent in Boulder County and Broomfield.*

Responses from both Boulder/Broomfield and Longmont Focus Groups: The group identified the following impediments/barriers to fair housing: cost of housing (rents and ownership); the current rental market disincentive for landlords to accept Housing Choice Vouchers; poor credit (in spite of employment or rental histories); cost of application fees and deposits; criminal records; stigma of transitioning out of subsidized housing (shelter, transitional); social security number requirement impeding undocumented immigrants accessing housing; the internet (landlords Googling potential tenants). Given the tight rental market, landlords have the ability to be more selective and any of these factors could be a barrier to access housing. One participant in the Longmont group suggested that there is a need to change the definition of family to include LGBT, multigenerational, grandparents raising grandkids, siblings raising siblings, etc. to lead to changes in occupancy ordinances to add to the diversity of housing options.

Discussion Question #4: *Are you aware of a situation when someone was denied the opportunity or steered away from buying or renting in a particular neighborhood of Boulder County or Broomfield? Please share a brief sketch of the situation. If you answered yes to question 4, was the problem reported to someone in authority? Who? If not, why not?*

Responses from Boulder/Broomfield Focus Group: The group did not identify any specific situations of someone being steered away from particular areas of the community. One member identified Boulder as integrated and said that of greater concern is availability of affordable units or the limits presented through rental criteria (income, credit reports, criminal history, fixed income). One participant shared a story of a client that had a domestic violence incident involving the abuser that resulted in the renter losing their housing.

Responses from Longmont Focus Group: Participants identified Longmont as featuring diverse neighborhoods and that steering may have happened in the past but no longer.

Discussion Question #5: *In your opinion, is there housing discrimination in Boulder or Broomfield County?*

Responses from Boulder/Broomfield Focus Group: One participant affiliated with the City of Boulder Human Relations Commission which upholds the Human Rights Ordinance for the City of Boulder, stated that housing discrimination complaints come in second in frequency only to employment complaints. The complaints run the gamut of protected classes with the most frequent relating to national origin and disabilities. Another participant stated that discrimination may be too strong of a term but there are

inherent economic barriers (lack of availability of affordable units, seniors on fixed incomes, lack of accessible units) and that availability of safe and decent housing is overridden by sheer economics. Another participant spoke to discrimination associated with national origin in terms of lacking a social security number or differences in cultural practices. It was also mentioned that persons with emotional support animals are often denied.

Responses from Longmont Focus Group: In Longmont, it was stated that discrimination is experienced by families with children. Otherwise the group identified that Longmont is very diverse.

Discussion Question #6: *What unique housing challenges face Section 8 tenants? Housing Choice Vouchers – allow individuals/families to use vouchers to find rental housing in the private market.*

Responses from Boulder/Broomfield and Longmont Focus Groups: Both groups discussed that due to the current economic environment landlords are opting to not accept Housing Choice vouchers. In the Boulder/Broomfield Focus Group it was expressed that there is a great need to provide support services to users of vouchers to help them find a unit and maintain the housing. To provide a voucher is not enough, case management is more likely to ensure successful housing. This is especially needed for individuals transitioning out of the shelter environment or those who have mental health disabilities. In both communities, there were stories of vouchers being returned because users could not find housing options that would accept the vouchers.

Discussion Question #7: *Is there a sufficient number of units in the region accessible to persons with disabilities?*

Responses from Boulder/Broomfield and Longmont Focus Groups: The groups shared the sentiment that this is lacking in the region. The lack of accessible units not only impacts persons with disabilities but also seniors wanting to age in place. Furthermore, any availability that exists or is coming online has exorbitant wait lists and/or lease up immediately. Given the suburban and rural environment of parts of the region, even if units are built to be visitable/accessible, the locations are challenging due to the lack of connectivity or transit options.

Discussion Question #8: *What can be done to promote fair and affordable housing options in Boulder County and Broomfield?*

Responses from Boulder/Broomfield and Longmont Focus Groups: Both groups identified education as critical including education of renters (how to find housing, how to maintain housing) and education of landlords (benefits of vouchers for the communities, working with lower income populations). Increase incentives for landlords to rent to low income renters (subsidy to pay the gap between rent and market rents). Creating incentives/provide funds for landlords to modify units to make them accessible for seniors or persons with disabilities. Broaden programs helping low income owners to modify homes to allow them to age in place or be occupied by a person with a disability. Language was another barrier that could be addressed by providing services to assist with the translation of leases and other legal documents. In Boulder, it was mentioned that it was explored to expand the Human Rights Ordinance to include source of income, i.e., assistance such as housing choice vouchers. This has proven to be challenging because to include as possible cause for discrimination it has to be proven to be

discriminatory. However, given that denial based on source of income can be economically driven it is difficult to prove it to be discriminatory.

Discussion Question #9: *Are you aware of where to go to get assistance or to refer someone with fair housing questions or concerns in Boulder County and Broomfield? Where would you go/refer someone?*

Responses from Boulder/Broomfield Focus Group: The following resources were identified in Boulder: Boulder County Legal Services, the City of Boulder Human Relations Commission, the Metro Denver Office of Fair Housing.

Responses from Longmont Focus Group: Participants identified Inn Between, Our Center, the City of Longmont District Attorney's Office. It was stated that services are lacking in north Longmont as well as persons need assistance filling out forms and gaining access to the internet.

Discussion Question #10: *Is there sufficient outreach and education regarding affirmatively furthering housing in Boulder County and Broomfield?*

Responses from Boulder/Broomfield Focus Group: It was stated that there is a lack of education around renters' rights/protections. It was mentioned that there is renter education classes offered through Boulder County.

Responses from Longmont Focus Group: The group identified the need for financial skills classes, support for people filling out complicated voucher forms/leases, and access to the internet.

Discussion Question #11: *Have you participated in Fair Housing training?*

Responses from Boulder/Broomfield and Longmont Focus Groups: All participants expressed a lack of Fair Housing training.

Summary of Online Survey Results

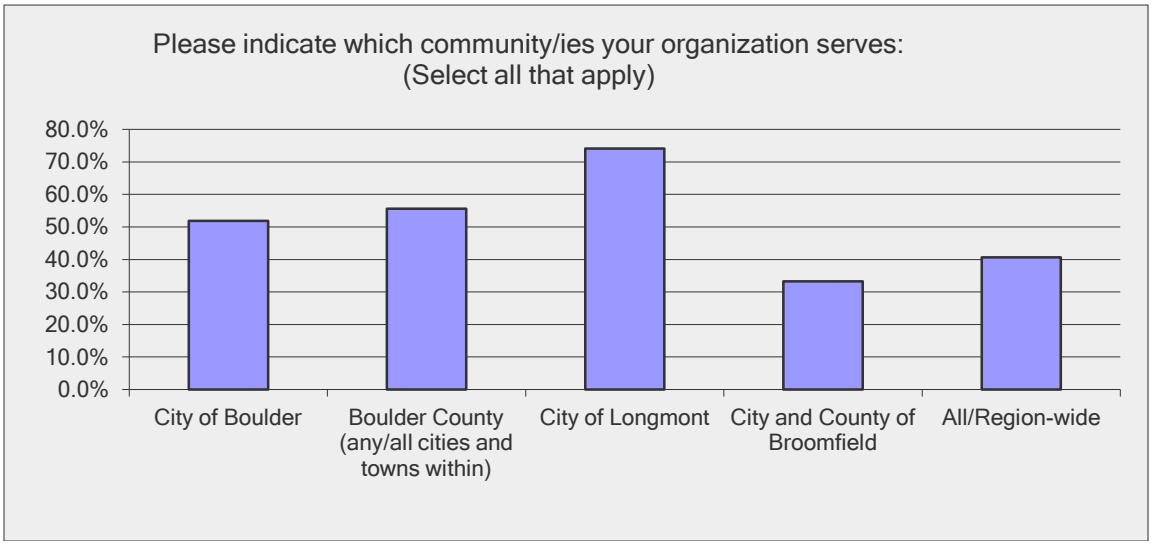
While presenting a limited response rate of 26 which represents 21% of the survey group, valuable information and commentary was received through the survey – some mirrored the information collected through the focus groups.

Similar to the focus group participants, the majority of survey respondents believe that there are barriers to fair housing within the region. The survey respondents identified the following as the primary impediments to fair housing choice: lack of affordable housing, actions of property owners/managers, bias against people receiving federal housing assistance, employment issues (low wages, unemployment, lack of job training). These impediments are indicative of the respondents' identification of a combination of economic barriers and discrimination as the primary impediments to persons accessing housing.

The following provides an overview of the survey questions and responses.

SURVEY QUESTION 1: Please provide the following information about you and your agency.

SURVEY QUESTION 2: Please indicate which community/ies your organization serves: (Select all that apply) (26 answered, 0 skipped)



The split between the County areas were not equally representative. Fifty-six percent (56%) of agencies that responded serve only Boulder County, and 33% serve only Broomfield. Forty-one percent (41%) of the agencies serve the entire Consortium area.

SURVEY QUESTION 3: Do you believe that significant impediments/barriers to Fair Housing exist in the Boulder/Broomfield Consortium area? (26 answered, 0 skipped)

Answer Options	Response %	Response #
Yes	53.8%	14
No	30.8%	8
Don't know	15.4%	4
TOTAL	**100%**	**26**

SURVEY QUESTION 4: If you answered yes, please list the impediments/barriers that you are aware of. (14 answered/12 skipped)

Notes: in this section, respondents were asked to write in their answers; there were no options for respondents to choose from.

Respondent	Responses
1	The action by a former city council that gutted the affordable housing language in the laws of Longmont.
2	The biggest barriers we see is the language barrier.
3	Ethnic background, language, cultural competent services
4	Stigma towards housing vouchers and people with mental illness.
5	Rents are too high for persons living with disabilities. Landlords are concerned about infectious disease (HIV, Hepatitis C).
6	Housing is not affordable; standards governing repairs are not enforced – substandard housing abounds; landlords are able to discriminate without legal repercussions; ADQA compliance often isn't followed.
7	Purchase and rental housing by Latinos. Insufficient amount of rental housing that is accessible by someone with a physical disability.
8	I think that the primary victims are immigrants and who may not be able to speak English. They are denied rentals for reason like they don't speak English or receive less maintenance because of their national origin. Another group is people with disabilities they are not treated fairly followed by families.
9	I have had client report issues with landlords re: disability status.
10	With individual property owners.
11	See below. (Note: this refers to the next question with example options. This response included: Resistance by neighbors to development of housing for persons with disabilities (NIMBY-ism/Not In My Backyard; Fear and or misunderstanding of people from different racial or ethnic backgrounds; Open space/regulations can make land impossible or difficult to develop into housing and therefore reduces the available supply.)
12	Down payment assistance should be more realistic to homeowners in affordable housing. Language barriers. Lending practices.
13	The high cost of housing.
14	See below. (Note: this refers to the next question with example options. This response included: Discrimination based on racial or ethnic background in the rental housing market; Lending discrimination or lack of information about lending practices for protected classes; Discrimination against families with children; Discrimination against person with mental or physical disabilities; Insufficient Fair Housing education and materials for residents; Insufficient multi-lingual marketing efforts regarding housing options or opportunities targeted to those who have limited English proficiency; Resistance by neighbors to development of housing for persons with disabilities (NIMBY-ism/Not In My Backyard); Geographic concentration of racial and/or ethnic minorities; Geographic concentration of low- and very low-income persons, and of assisted housing; Lack of large rental units to accommodate families with children; Lack of public transportation in suburban areas that results in limited access of households without automobiles from residential opportunities in those areas; Fear and or misunderstanding of people from different racial or ethnic backgrounds; Actions of rental property owners or managers.

The responses indicate a variety of impediments to Fair Housing. A few replies that were mentioned by more than one responder are language and cultural barriers, unfair lending practices, lack of affordable housing, and discrimination against people with mental or physical disabilities.

SURVEY QUESTION 5:
The following are some examples of common impediments to Fair Housing that may or may not be relevant to the Consortium Area. Please check any/all that you believe are considered impediments to our area and/or add your own.
(22 answered/4 skipped)

Answer Options	Response %	Response #
Resistance by neighbors to development of housing for persons with disabilities (NIMBY-ism/Not In My Back Yard)	63.6%	14
Geographic concentration of low- and very low-income persons, and of assisted housing	59.1%	13
Discrimination against persons with mental or physical disabilities	50.0%	11
Geographic concentration of racial and/or ethnic minorities	45.5%	10
Discrimination based on racial or ethnic background in the rental housing market	40.9%	9
Insufficient multi-lingual marketing efforts regarding housing options or opportunities targeted to those who have limited English proficiency	40.9%	9
Fear and or misunderstanding of people from different racial or ethnic backgrounds	40.9%	9
Lack of public transportation in suburban areas that results in limited access of households without automobiles from residential opportunities in those areas	36.4%	8
Actions of rental property owners or managers	31.8%	7
Discrimination against families with children	27.3%	6
Discrimination against families with children	27.3%	6
Lack of large rental units to accommodate families with children	27.3%	6
Discrimination based on racial or ethnic background in the sales housing market	18.2%	4
Lending discrimination or lack of information about lending practices for protected classes	18.2%	4
Insufficient Fair Housing education and materials for residents	18.2%	4
Insufficient Fair Housing education, materials and training for landlords, property owners, and real estate agents	13.6%	3
Zoning requirements limiting use or size of group homes, without exceptions for persons with disabilities	9.1%	2
Insufficient number of curb cuts to make housing accessible to those with mobility impairments	9.1%	2
Other (Note: these responses were written in by responders):		
Property managers violating/abusing their authority	4.5%	1
Unaffordable housing for low-income	4.5%	1
Open Space/regulations can make land impossible or difficult to develop into housing and therefore reduces the available supply	4.5%	1
The high cost of housing	4.5%	1

The top five impediments identified as those which affect us regionally by the majority of Respondents indicate to the Consortium that a majority of respondents believe there is discrimination to our residents, particularly to those who have low-income, disabilities and/or belong to a racial or ethnic minority. Specific areas to address include housing development, geographic concentration, and general discrimination issues, particularly in the rental housing market.

SURVEY QUESTION 6: For any impediments you selected in Question 5, do you believe they are limited to specific areas within the region or do they tend to occur throughout the region? (Please select all that apply) (22 answered/4 skipped)

Answer Options	Response Percent	Response Count
All/Region-wide	62.5%	15
City of Longmont	29.2%	7
Boulder County (any/all cities and towns within)	25.0%	6
City of Boulder	20.8%	5
City and County of Broomfield	8.3%	2
Don't know	4.2%	1
	answered question	**24**
	skipped question	**3**

Respondents indicated that the main impediments occur regionally, with almost equal emphasis in Boulder County, Longmont and Boulder. By comparison, respondents believe that Broomfield, on its own, contained the least impediments.

SURVEY QUESTION 7: For any impediments you checked in question #5, what basis do you believe was the cause? (Please select all that apply) (20 answered/6 skipped)

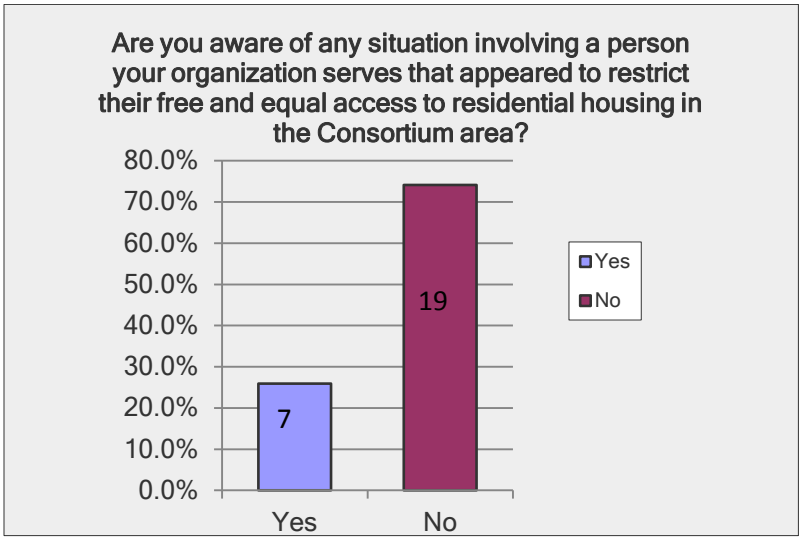
Answer Options	Response %	Response #
Race	52.40%	11
Language and education differences	42.90%	9
Disability (mental or physical)	38.10%	8
National Origin	38.10%	8
Color	33.30%	7
Familial Status	28.60%	6
Don't know	15.40%	4
Sex	9.50%	2
Sexual Orientation (city of Boulder only)	9.50%	2
Religion	0.00%	0
Ancestry (city of Boulder only)	0.00%	0
Creed (city of Boulder only)	0.00%	0
Gender Variance (city of Boulder)	0.00%	0
Genetic Characteristics (city of Boulder only)	0.00%	0
Marital Status (city of Boulder only)	0.00%	0
Other (please specify)		8
Fear of low income housing devaluing surrounding property values/Fear of lowered values of their homes		2
General lack of understanding		1
HIV status		1
Low-income housing/group homes will draw transient or homeless population		1
Structural impediments to creating affordable housing		1
Income, and fear		1
Age		1

Four (51%) of the impediments identified are related to race, color, ethnicity or national origin.

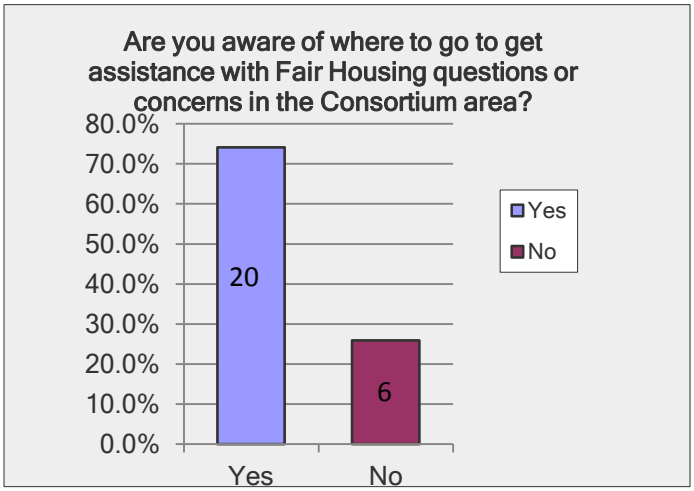
SURVEY QUESTION 8: What do you believe to be the main cause, or causes, of impediments to Fair Housing choice? (22 answered/4 skipped)

Answer Options	Response %	Response #
Lack of affordable housing	76.9%	20
Actions of rental property owners and/or rental property managers	46.2%	12
Bias against people who receive federal housing assistance	46.2%	12
Employment Issues – low wages/unemployment/lack of job training opportunities	42.3%	11
Fear and misunderstanding of those with disabilities	38.5%	10
Language/cultural issues	38.5%	10
Racial Bias	34.6%	9
Inadequate or inaccessible public transportation that limits residential choices	26.9%	7
Lack of diversity in housing unit size (i.e. not enough 1- or 3+-bedroom units)	23.1%	6
Lack of education about Fair Housing rights and responsibilities	23.1%	6
Local jurisdiction policies and regulations (such as, but not limited to, building codes; health and safety codes; occupancy codes; subdivision regulations; zoning regulations)	23.1%	6
Lack of accessible housing	19.2%	5
Lending practices/foreclosures	15.4%	4
Distribution throughout the community of municipal and other services such as transportation, social services, schools, health services, hospitals, banks and other lending institutions	11.5%	3
Inadequate enforcement of existing laws	11.5%	3
Age Discrimination	3.8%	1
Don't Know	3.8%	1
Actions of Homeowners Associations	0.0%	0
Other (please specify)		
NIMBY (Not In My Backyard) Stigma		1
State-wide ban on real estate transfer tax		1
Managers who discriminate illegally		1

SURVEY QUESTION 9: Are you aware of any situation involving a person your organization serves that appeared to restrict their free and equal access to residential housing? (26 answered/0 skipped)



SURVEY QUESTION 10: Are you aware of where to go to get assistance with fair housing questions or concerns in the Consortium area? (26 answered/0 skipped)

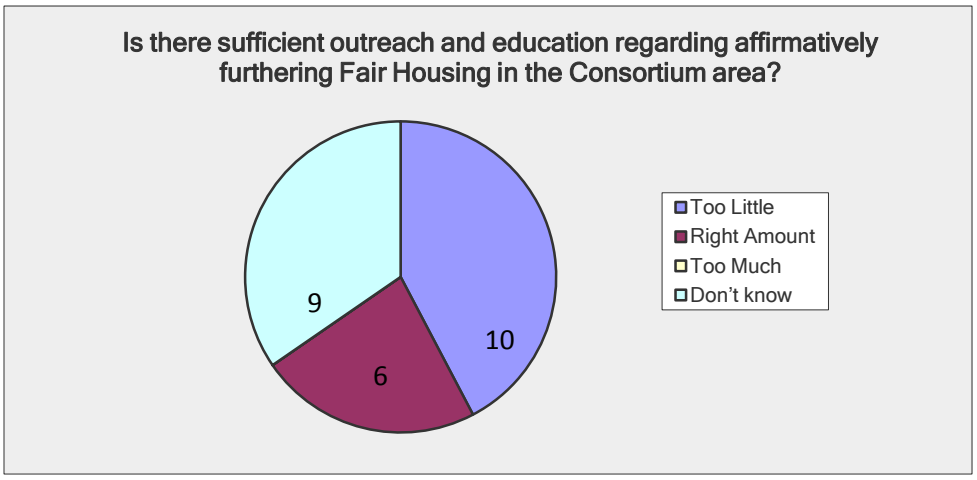


SURVEY QUESTION 11: If yes, please share the names of the organizations that you are aware of who assist with Fair Housing issues. (18 answered/8 skipped)

#	Resource
1	Colorado Department Local Affairs - Fair Housing Resource/Info
2	City of Longmont Community & Neighborhood Resources
3	Boulder County AIDS Project Pro Bono Legal Team
4	Boulder Broomfield Regional Consortium, FSS (Family Self-Sufficiency), Housing Authority, Boulder Housing Partners
5	Boulder Affordable Housing program
6	City of Longmont Landlord/Tenant Mediation
7	City of Longmont Community and Neighborhood Resources; City of Boulder Human Relations Commission; Colorado Civil Rights Organization
8	Community & Neighborhood Resource-city of Longmont, Office of Civil Rights City of Boulder
9	Boulder County Legal Services
10	City of Boulder
11	Longmont Housing and Boulder County Housing
12	Longmont Housing Authority
13	City of Longmont Senior Center
14	Boulder Housing Partners, FSS (Family Self-Sufficiency)
15	Boulder County Legal Services
16	Boulder Housing Partners
17	HUD office of Fair Housing, CHFA, City of Boulder Housing Division, Colorado Division of Housing, County legal support team
18	City of Longmont Community & Neighborhood Resources

These Respondents showed an understanding of resources available and if an agency was not cited, an organization that may provide this information was.

SURVEY QUESTION 12:
Is there sufficient outreach and education regarding affirmatively furthering fair housing in the Consortium area?
(25 answered/1 skipped)



SURVEY QUESTION 13:
Please share any additional information that you believe would help the Consortium understand the impediments/barriers to Fair Housing faced by the citizens in this region.
(8 answered/18 skipped)

1	Again the biggest barrier our organization is seeing is the language barrier and property managers abusing their authority.
2	Lack of information for property owners/managers re fair housing; lack of info for tenants who may not know their rights.
3	Tight housing market so do not want to alienate landlords. Many situations are hard to prove.
4	A commitment to outreach and education for sustained period 1-2 years. Hiring a coordinator to education and outreach to landlords, realtors, tenants, prospective buyers and general community. Along with assistance to file a complaint.
5	Boulder County needs more affordable housing for its citizens.
6	Zoning restrictions or HOA's that bar group homes existing in their areas
7	There is insufficient action aimed at eliminating the state-wide ban on real estate transfer taxes, which would allow the area to development a substantial fund to support fair housing as well as reduce speculation which drives up the cost of housing.
8	There is landlord/tenant education, but not enough or any targeted to the actual on site managers.

SURVEY QUESTION 14:
Would it be ok if we contacted you by phone or email if we had further clarifying questions?
(26 answered/0 skipped)

Answer Options	Response %	Response #
Yes	70.4%	19
No	29.6%	7

Appendix II. Demographic and Housing Profile

Introduction

This section of the AI provides a demographic and housing market overview for the Boulder Broomfield Regional Consortium as well as the three Participating Jurisdictions; the cities of Boulder, Broomfield and Longmont. It includes a general overview of the area and explores potential disproportionate impacts of the lack of affordable housing on members of protected classes.

Geographic Overview

The Boulder Broomfield Regional Consortium comprises all of **Boulder County** and the **City and County of Broomfield**, including the **three Participating Jurisdictions**;

City of Boulder
City and County of Broomfield
City of Longmont

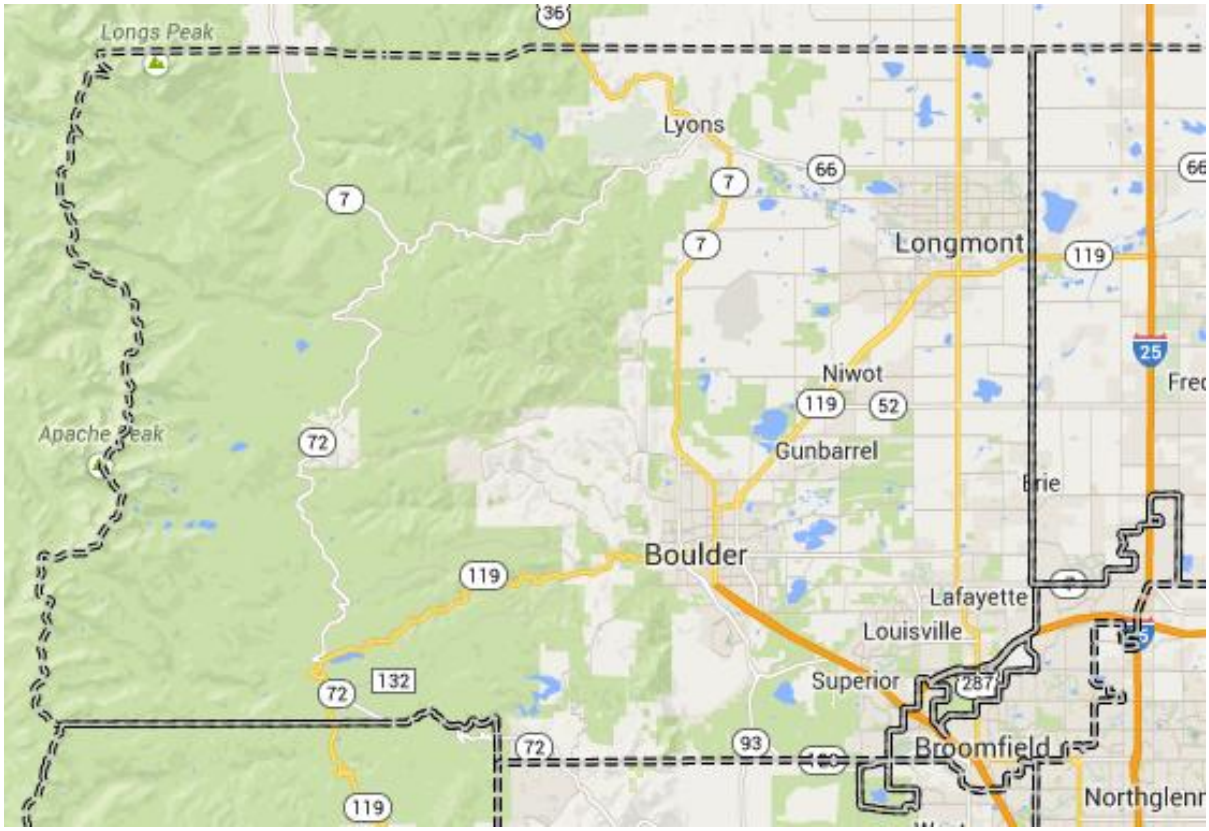
Other cities and towns with local governments in Boulder County include:

Town of Erie (west of County Line Rd.)
Town of Jamestown
City of Lafayette
City of Louisville
Town of Lyons
Town of Nederland
Town of Superior
Town of Ward

Boulder County comprises the vast majority of the Boulder, CO MSA, while the City and County of Broomfield are the northern extent of the Denver-Aurora-Broomfield, CO MSA. Both cities, Broomfield and Boulder, are located on the US-36 corridor, which extends south toward Denver and north to Lyons and Estes Park. Boulder is located against the foothills of the Rocky Mountains. Longmont is located in the plains in the northeast corner of Boulder County. Louisville, Lafayette, Erie and Superior are located in the southeast portion of Boulder County. Jamestown, Nederland and Ward are all mountain communities located west of Boulder. Lyons is located in the north central portion of Boulder County against the foothills.

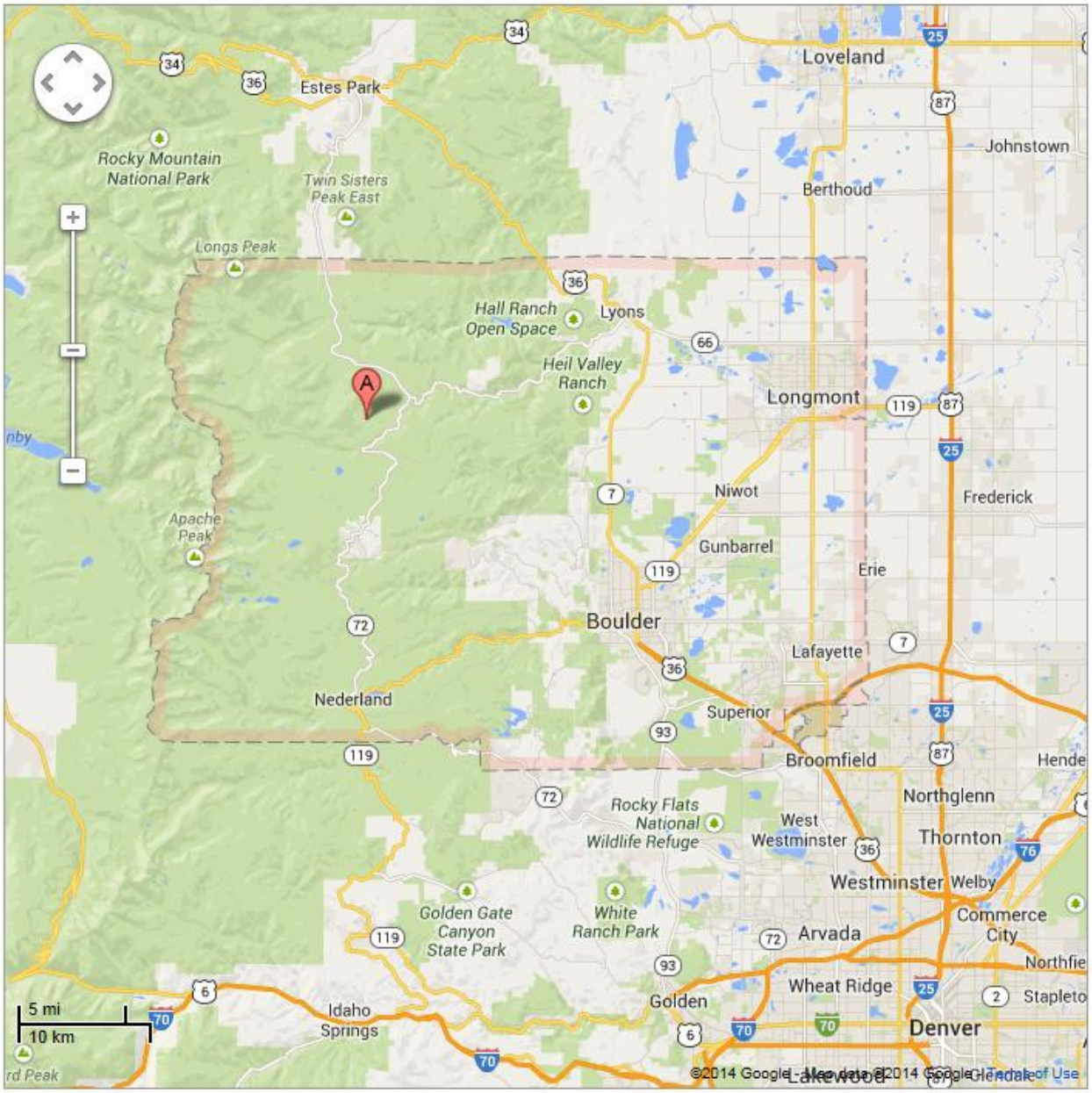
Maps follow.

Map: Boulder Broomfield Regional Consortium



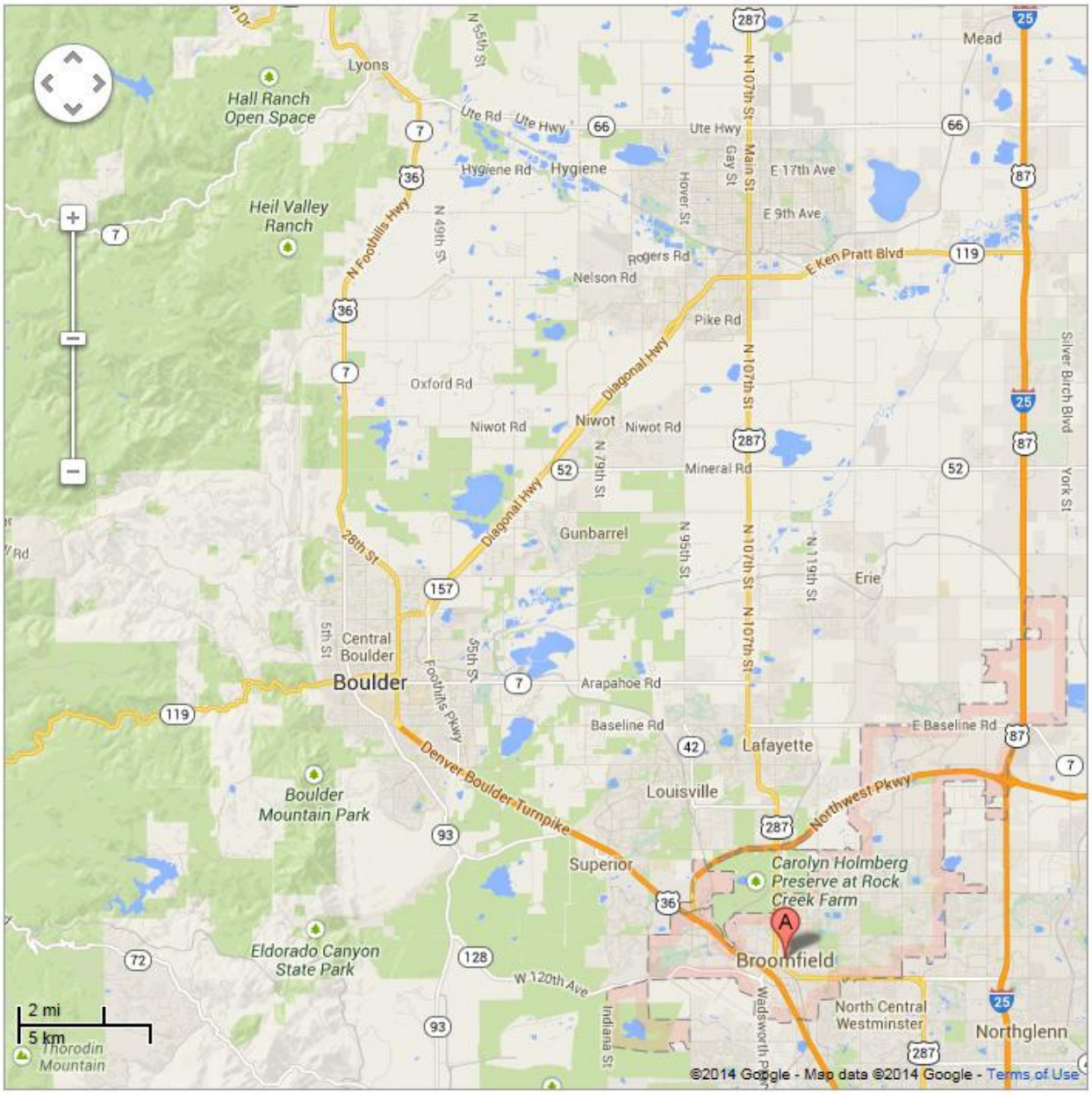
Sources: Denver Regional Equity Atlas

MAP: Boulder County, Colorado



Source: Google Maps, 2014

MAP: City and County of Broomfield, Colorado



Source: Google Maps, 2014

Demographics

General Population

This table shows the change in the size of the general population in the HOME Consortium area, including the three primary jurisdictions (City of Boulder, City and County of Broomfield, and City of Longmont). In 2001, the City of Broomfield, which extended into Adams County, Boulder County, Jefferson County and Weld County, became Broomfield County through a statewide ballot issue. For this reason, the growth rates shown below reflect a mix of population growth and boundary changes. From these data, we can conclude that the three primary jurisdictions and the area overall are experiencing population growth with the strongest growth in Broomfield and Longmont. Boulder County's relatively low rate of growth is explained in part by Broomfield's secession from Boulder County. In 2012, there were an estimated 353,131 individuals living in the HOME Consortium area.

Population, Boulder County, Broomfield County, Longmont, and Boulder, 2000-2012

Geography	2000	2012	Change	Percent
Boulder (City of)	94,673	99,177	4,504	4.8%
Broomfield (City, 2000), (City & County, 2012)	38,272	55,913	17,641	46.1%
Longmont (City of)	71,093	86,355	15,262	21.5%
Boulder (County of)	291,288	297,218	5,930	2.0%
Total Consortium Area		**353,131**		

Source: 2000 Cenus and 2012 ACS 5-year estimates

Race and Ethnicity

This table shows the racial and ethnic makeup of the HOME Consortium area and the three primary jurisdictions. The Consortium area is predominantly white (87.7%). The largest nonwhite categories reported are Asian (4.2%), "some other race" (3.8%), and "two or more races" (3.0%). Longmont has the largest nonwhite population proportionately (15.9%).

Racial Composition, Boulder Broomfield Regional Consortium Area, 2012

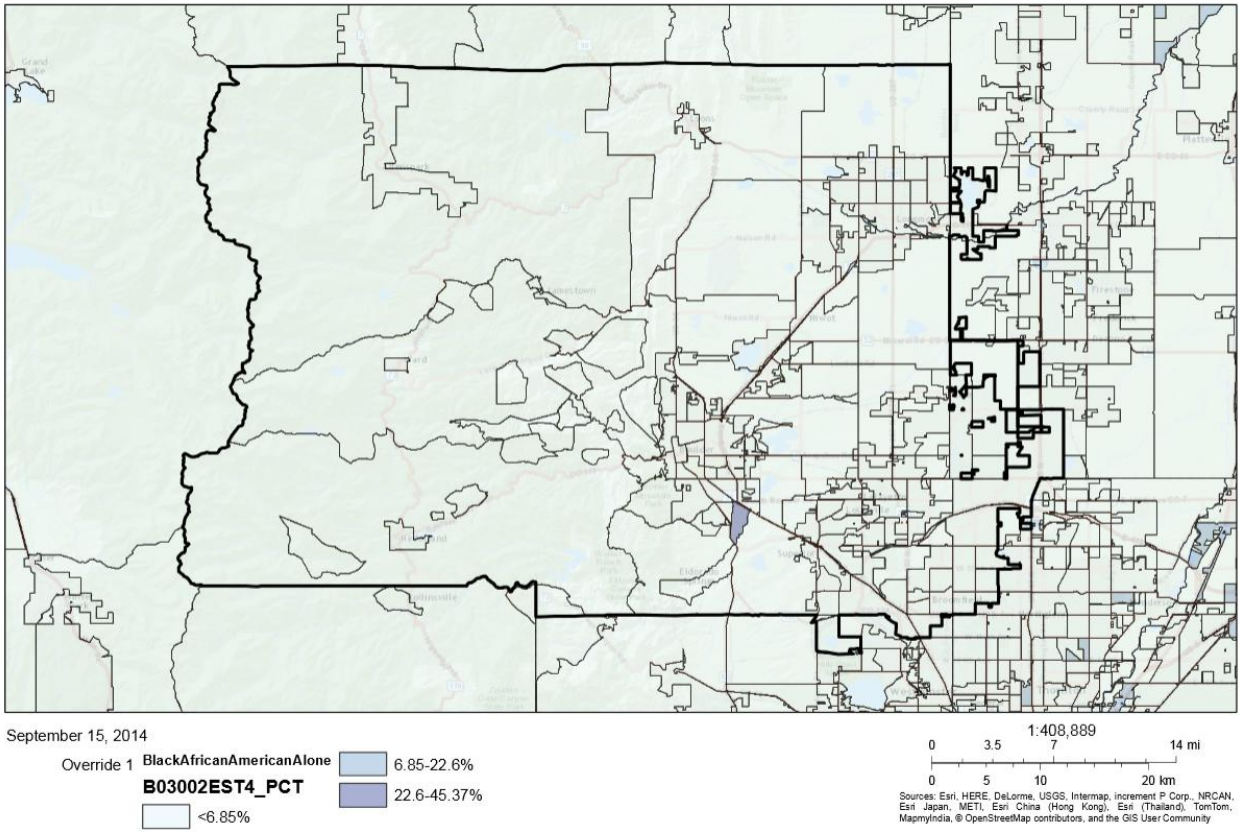
Geography	White	Black or African American	American Indian & Alaska Native	Asian	Native Hawaiian & Other Pacific	Some other race	Two or more races
Consortium Area (Boulder & Broomfield Counties)	**87.7%**	**0.9%**	**0.4%**	**4.2%**	**0.0%**	**3.8%**	**3.0%**
Boulder (City of)	88.9%	0.9%	0.2%	4.5%	0.1%	2.7%	2.8%
Broomfield	87.6%	0.8%	0.3%	5.2%	0.0%	1.8%	4.3%
Longmont	84.1%	1.1%	0.8%	2.4%	0.0%	9.1%	2.5%
Boulder (County of)	87.7%	0.9%	0.4%	4.0%	0.0%	4.2%	2.7%

Source: 2012 ACS 5-year estimates

Census Tracts with Racial Concentration

HUD defines a concentration of race, ethnicity and/or poverty as a census tract with 20 percent higher concentration than the average for the counties. There are two census tracts that qualify by this definition as areas of racial concentration. The first is a census tract located on the south end of Boulder, tract 125.08, in which 44.74% of residents are estimated to be Black or African American. The second is a census tract located west of Boulder in the foothills. In this community, 47.83% of residents (11 of 23 residents) are estimated to have two or more races.

Map. Black or African American, Boulder Broomfield Regional Consortium Area, 2012



Map Zoomed. Census Tract 125.08, High Concentration of Black or African American, Boulder Broomfield Regional Consortium Area

Source: DRCOG Denver Regional Equity Atlas

Legend

- Bike Routes
- Municipalities
- Bus Stops
- Existing Light Rail
- Tracts
- Rail Stations
- Future Rail Lines
- Future Bus Rapid Transit

School Performance

- Turnaround Plan
- AEC: Turnaround Plan
- Priority Improvement Plan
- AEC: Priority Improvement Plan
- Improvement Plan
- AEC: Default Improvement
- Performance Plan
- AEC: Performance Plan
- Other

Framework

- Counties

Age 5-17

- Less Than 10%
- 10-14%
- 15-19%
- Greater Than 20%

Observations, Census Tract 125.08, High Concentration of Black or African American Residents:

- **Conclusion:** Residents of this census tract do not appear to be at a locational disadvantage and in fact enjoy considerable amenities.
- **Location:** Southern end of Boulder, Partially inside City of Boulder and partially in unincorporated Boulder County. Bounded by: US-36 (NE), Table Mesa Blvd. (N), CR-93 (W), rural road (SE)
- **Access:** The populated portion of this census tract is primarily located on the north and west sides where numerous bus stops are available as well as bike paths and/or lanes. The NW corner of the census tract is a regional transit center Park N Ride, providing access to various Boulder job centers as well as downtown Denver via regional bus.
- **Community Amenities:** King Soopers shopping center, laundromat, banks, restaurant, pharmacy, hair salon, gas station, library and other amenities located on NW corner of census tract. Residents have ample access to open space, parks and trails.
- **Schools:** Less than 10 percent of the population of this census tract is school aged and nearby schools are all high performing. Boulder County School District has an open enrollment policy that provides district families with the opportunity to open enroll into any school in the district.

Hispanic and Non-Hispanic

This table shows individuals reporting to be of Hispanic or non-Hispanic origin in the HOME Consortium area and the three primary jurisdictions. Hispanic origin is claimed by 13.9% of residents of the Consortium area, making it the largest ethnic minority. Fully one quarter of Longmont's residents report Hispanic origin, making it the community with the largest Hispanic population.

Hispanic Origin, Boulder Broomfield Regional Consortium Area, 2012

Geography	Non-Hispanic	Hispanic
Consortium Area (Boulder & Broomfield Counties)	**86.1%**	**13.9%**
Boulder (City of)	91.2%	8.8%
Broomfield	88.6%	11.4%
Longmont	74.9%	25.1%
Boulder (County of)	86.7%	13.3%

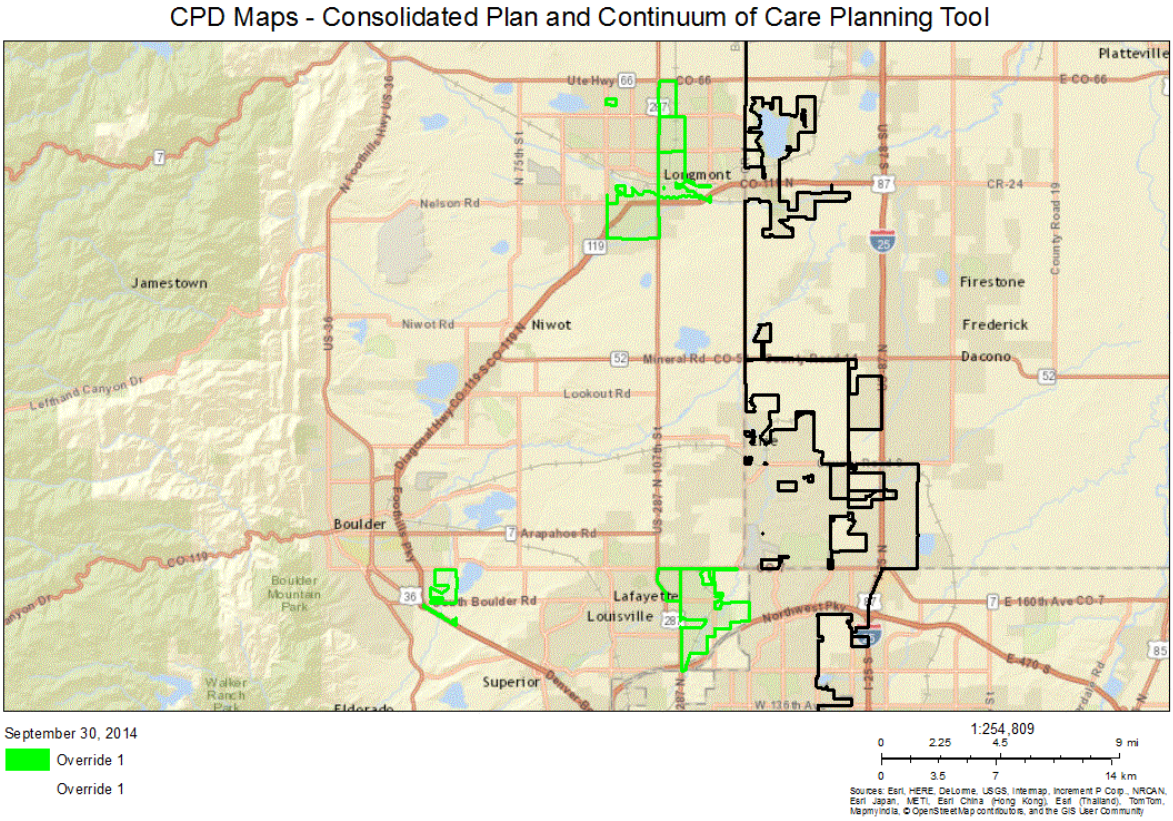
Source: 2012 ACS 5-year estimates

Census Tracts with Ethnic Concentration

There are eight census tracts in the Boulder Broomfield Regional Consortium with high concentrations of residents who report Hispanic origin. These census tracts are distributed between Longmont, census

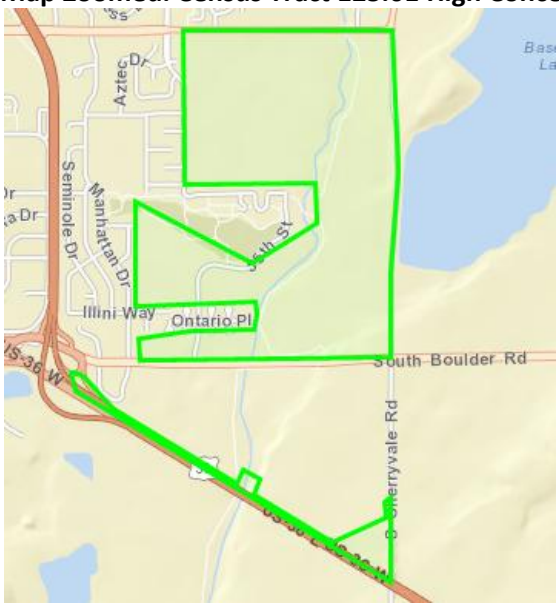
tracts located adjacent to the City of Boulder in unincorporated Boulder County, and in the City of Lafayette.

Map. Census Tracts with High Concentrations of Residents of Hispanic Origin, Boulder Broomfield Regional Consortium, 2012



Source: HUDCPD Maps, 2012; Note: GREEN OUTLINE = Census tract with high concentration

Map Zoomed. Census Tract 125.01 High Concentration of Hispanic Origin, Boulder



Source: HUD CPD Maps

Source Denver Regional Equity Atlas

Legend

- Bike Routes
- Municipalities
- Bus Stops
- Existing Light Rail
- Tracts
- Rail Stations
- Future Rail Lines
- Future Bus Rapid Transit

School Performance

- Turnaround Plan
- AEC: Turnaround Plan
- Priority Improvement Plan
- AEC: Priority Improvement Plan
- Improvement Plan
- AEC: Default Improvement
- Performance Plan
- AEC: Performance Plan
- Other

Framework

- Counties

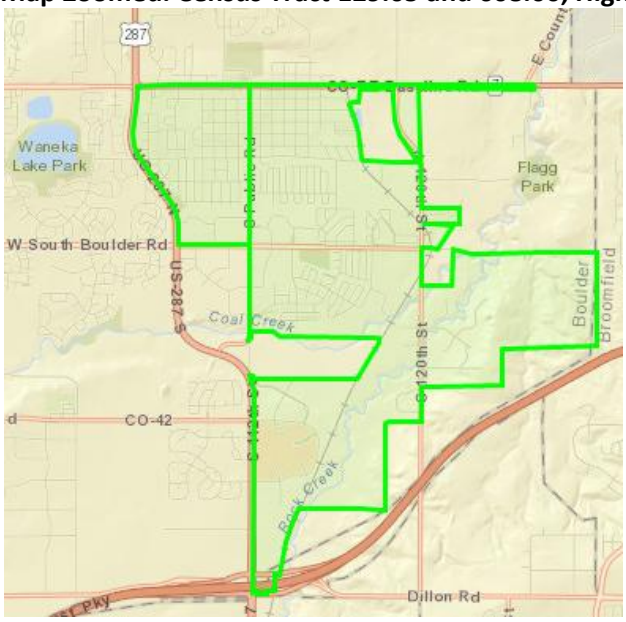
Age 5-17

- Less Than 10%
- 10-14%
- 15-19%
- Greater Than 20%

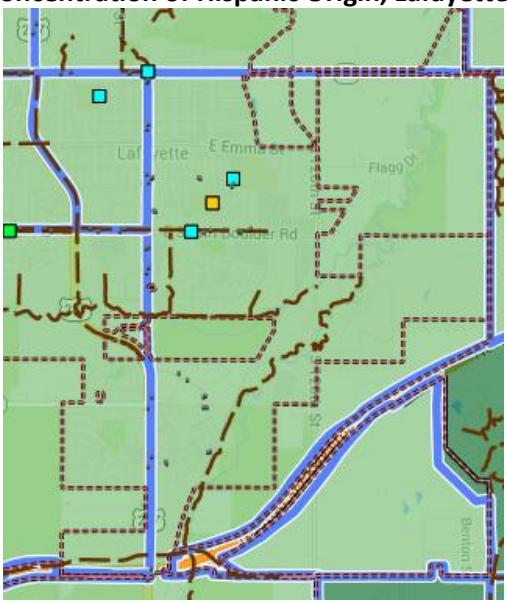
Observations, Census Tract 125.01, High Concentration of Hispanic Origin Residents, Boulder:

- **Conclusion:** Residents of this census tract do not appear to be at a locational disadvantage and in fact enjoy considerable amenities.
- **Location:** Southeastern Boulder, partially inside City of Boulder and partially in unincorporated Boulder County. Bounded by: US-36 (SW), Baseline Rd. (N), Foothills Pky. (W), Cherryvale Rd. (E)
- **Access:** This census tract is serviced by bus and bike paths are available as well. The SW corner of the census tract is a regional transit center Park N Ride, providing access to various Boulder job centers as well as downtown Denver via regional bus.
- **Community Amenities:** The nearest shopping center is a Safeway plaza with banks, restaurants, a pharmacy, hair salon, gas station, library and other amenities located adjacent to the on NW corner of the census tract. Residents have ample access to open space, parks and trails.
- **Schools:** The school-aged population of this census tract comprises 15 to 19 percent of the population and nearby schools are all high performing. Boulder Valley School District has an open enrollment policy that provides district families with the opportunity to open enroll into any school in the district.

Map Zoomed. Census Tract 129.05 and 608.00, High Concentration of Hispanic Origin, Lafayette



Source: HUD CPD Maps



Source Denver Regional Equity Atlas

Legend

- Bike Routes
- Municipalities
- Bus Stops
- Existing Light Rail
- Tracts
- Rail Stations
- Future Rail Lines
- Future Bus Rapid Transit

School Performance

- Turnaround Plan
- AEC: Turnaround Plan
- Priority Improvement Plan
- AEC: Priority Improvement Plan
- Improvement Plan
- AEC: Default Improvement
- Performance Plan
- AEC: Performance Plan
- Other

Framework

- Counties

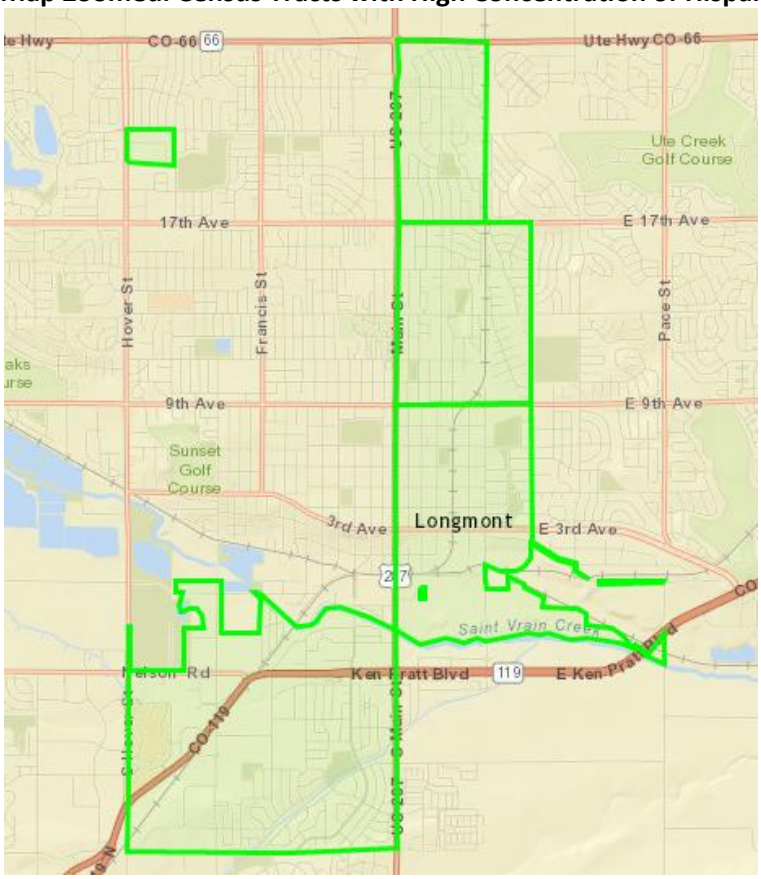
Age 5-17

- Less Than 10%
- 10-14%
- 15-19%
- Greater Than 20%

Observations, Census Tracts 129.05 and 608.00 with High Concentration of Hispanic Origin Residents, Lafayette:

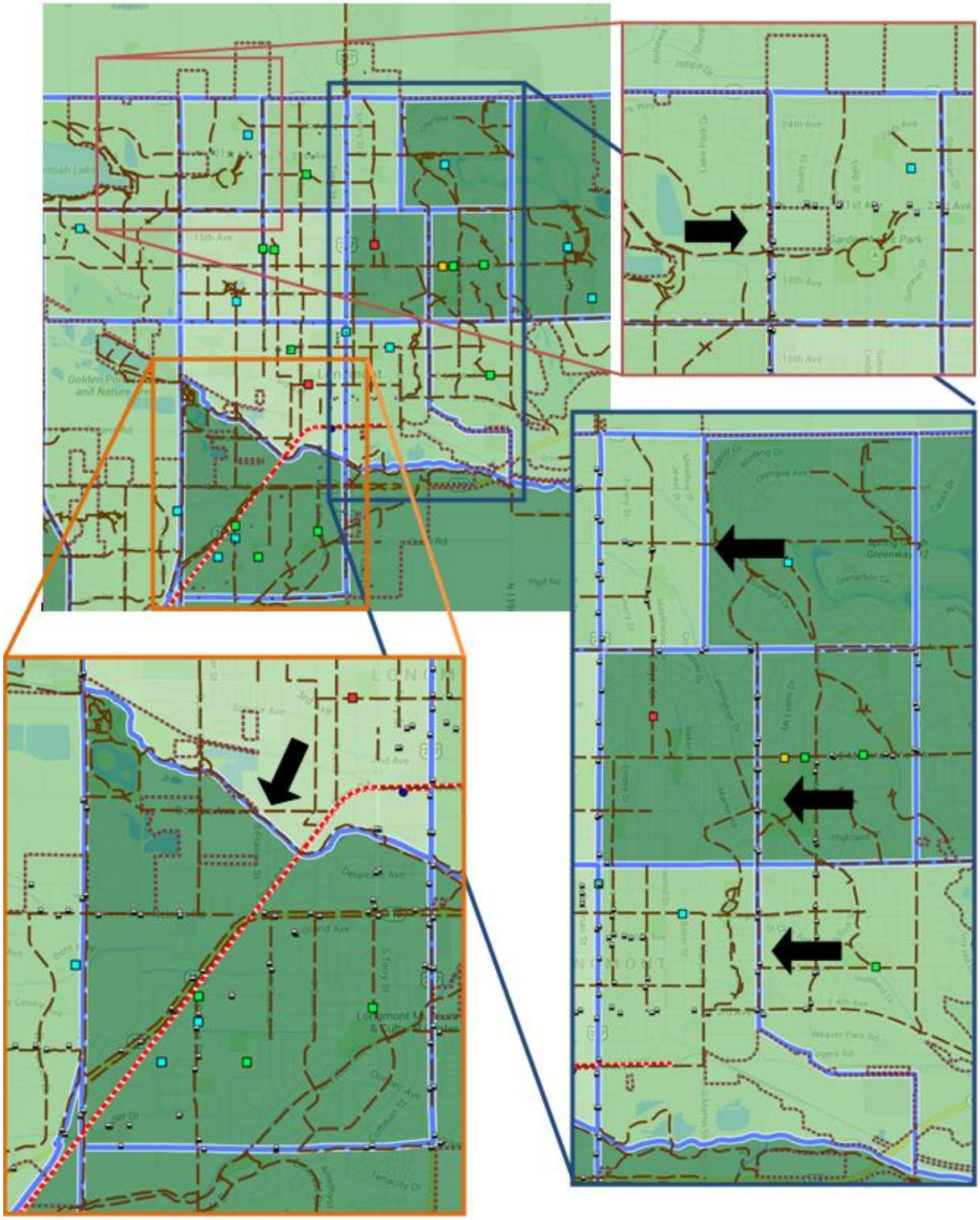
- **Conclusion:** Residents of these adjacent census tracts do not appear to be at a locational disadvantage and in fact enjoy considerable amenities.
- **Location:** Tract 129.05 is in midtown Lafayette and bounded by W. Baseline Rd. (N), US-287 (W), W. South Boulder Rd. (S) and S. Public Road (E). Tract 608.00 is located in eastern Lafayette, including the historic downtown and bounded by: S. Public Rd. (W), Baseline Rd. (N), Northwest Pky. (S), Boulder/Broomfield County Line (E)
- **Access:** These census tract is serviced by bus and bike paths along S. Boulder Rd., Baseline Rd. and Public Rd. with a Park N Ride on Public Rd. Busses connect to Boulder, Broomfield (and Denver beyond) and Longmont,
- **Community Amenities:** Three shopping centers, a recreation center, a library, City of Lafayette offices, banks, restaurants, shops and pharmacies are concentrated in the NW corner of these census tracts where the majority of the population is concentrated. Residents can walk to open space, parks and trails.
- **Schools:** The school-aged population of these census tracts comprises 15 to 19 percent of the population. All but one school is high performing and one is on a “priority improvement plan”. Boulder Valley School District has an open enrollment policy that provides district families with the opportunity to open enroll into any school in the district.

Map Zoomed. Census Tracts with High Concentration of Hispanic Origin, Longmont



Source: HUD CPD Maps

Map Zoomed. Census Tracts 132.10, 133.05, 134.01, 135.03, 135.05, High Concentration of Hispanic Origin, Longmont

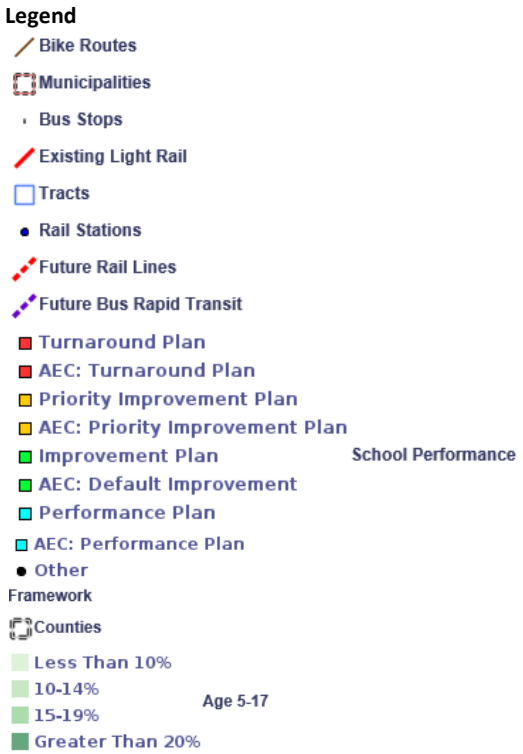


Source: Denver Regional Equity Atlas

Key

Black arrow →points to the census tracts with high concentrations.

blue outline shows census tract boundaries



Observations, Census Tract 132.10, 133.05, 134.01, 135.03, 135.05, High Concentration of Hispanic Origin Residents, Longmont:

- **Conclusion:** Overall the level of services, amenities and accessibility in these census tracts are quite high. The factor with the greatest variability among tracts is the quality of the schools in and near these tracts. St. Vrain Valley School District offers open enrollment which provides students with the opportunity to seek out higher quality schools.
- **Location:** Tract 133.05 is located in a neighborhood in NW Longmont, tract 134.01 is adjacent to the SE of the Hover St./21th Ave. intersection; three census tracts (135.05, 135.03, 134.01) are located E of Main St. between CO-66 to the N and CO-119 to the S; census tract 132.10 is located in SW Longmont and diagonally bisected by CO-119.
- **Access:**
  - **NW Longmont Tract, 133.05:** This census tract is serviced by bus along Hover Rd. and 21st Ave. and bike paths connect the neighborhood.
  - **Tracts East of Main St. 135.05 (northmost), 135.03 (middle), 134.01 (southmost):** Main St./US-287, a major transportation corridor, runs adjacent to these tracts on the West. Regular bus service is available along Main St. and on the East side of the tracts. A number of bike paths service these tracts. Residents in these tracts have relatively easy access to buses to other areas of the region and Longmont.
  - **SW Longmont Tract, 132.10:** Bus service is available on the West, East, South and in the middle of this tract. Buses that connect to the Boulder job market pass service this tract.

- **Community Amenities:**
  - **NW Longmont Tract, 133.05:** The nearest grocery store, a Safeway plaza with pharmacy, shops hair salon, and restaurants is located within walking distance to the tract. Several other shopping options, including a Wal-Mart Supercenter, King Soopers Supermarket are to the North at Main St. and 66th, and Sprouts supermarket is located to the south on Hover St. and directly accessible by bus. Garden Acres Park is located in the tract and McIntosh Lake, a large park with playgrounds, walking paths and boating are walkable to the west.
  - **Tracts East of Main St.. 135.05 (north most), 135.03 (middle), 134.01 (south most):** On the north end of the corridor adjacent to these tracts are several grocery shopping centers, including a Wal-Mart Supercenter and King Soopers Supermarket and several Walgreens Pharmacies. Several commercial markets, coffee shops, restaurants and stores are available along Main Street. A variety of services, including the housing authority, city offices, the senior center, and various nonprofit headquarters are located along Main St. Much of the municipal activity, including the library, is located in the southernmost of these tracts. At least seven neighborhood and community parks are located in or within walking distance of these tracts.
  - **SW Longmont Tract, 132.10:** A shopping district with several grocery stores, big box stores, restaurants, coffee shops and services is located near the intersection of Hover St. and CO-119 in the SW corner of the tract. The Boulder County Fairgrounds and its adjoining open space are located in the north eastern portion of this tract, the Longmont Museum and Cultural Center and several neighborhood parks are located in the southern portion of this census tract.
- **Schools:** The St. Vrain Valley School District offers the opportunity to open enroll into a school of choice.
  - **NW Longmont Tract, 133.05:** One higher performing school is located in this tract. Fifteen to 19 percent of households in this tract have school-aged children.
  - **Tracts East of Main St.. 135.05 (north most), 135.03 (middle), 134.01 (south most):** School performance in these tracts is variable. Two are high performing, three are in the "improvement" category, one is a "priority improvement" school, and one is a "turnaround" school. In the northern and southernmost tracts, between 15 and 19 percent of households have school-aged children. In the middle tract, more than 20 percent of households include school-aged children.
  - **SW Longmont Tract, 132.10:** Three of the schools in this census tract are high performing and three are in the "improvement" category. In this tract, more than 20 percent of households include school-aged children.

Speak English Less Than "Very Well"

Another indicator of residents' access to resources in a community is the ability to communicate well in English. During the 2010 Census, 5.9% of individuals over the age of five living in the HOME Consortium area were reported to speak English less than "very well" and 4.2% of individuals reported speaking English less than "very well" and spoke Spanish as their primary language. About 11% of Longmont's residents reported speaking English less than "very well" and nearly ten percent of residents who spoke English less than "very well" spoke Spanish as a primary language.

Speak English Less than "Very Well", Boulder Broomfield Regional Consortium Area, 2010

	Overall		Spanish	
Geography	Number	Percent	Number	Percent
Consortium Area (Boulder & Broomfield Counties)	**19,144**	**5.9%**	**13,540**	**4.2%**
Boulder (City of)	4,454	4.8%	2,813	3.0%
Broomfield	2,098	4.3%	897	1.8%
Longmont	8,261	10.7%	7,443	9.7%
Boulder (County of)	17,046	6.2%	12,643	4.6%

Source: 2010 ACS 5-year estimates

Disability

The disability rate in the HOME Consortium communities ranges from 7% in Boulder to 9.8% in Longmont with an overall rate of disability of 7.8%.

Incidence of Disability, Boulder Broomfield Regional Consortium Area, 2012

	Population		
Geography	General	With Disability	% Disabled
Consortium Area (Boulder & Broomfield Counties)	**355,425**	**27,560**	7.8%
Boulder (City of)	99,181	6,943	7.0%
Broomfield	56,960	4,716	8.3%
Longmont	86,891	8,534	9.8%
Boulder (County of)	298,465	22,844	7.7%

Source: ACS 2012 3-Year Estimates

Families with Children Ages 18 and Under

Families with children are often the target of housing discrimination. In the Consortium area, 29.1% of households are family households with school-aged or younger children. Boulder has the lowest percentage of family households (19.0%) and Longmont (34.7%) has the largest proportion of family households among the Primary Jurisdictions. Boulder is a university town, which likely explains the higher proportion of non-family households.

Among families, those headed by a single woman with school-aged children are far more likely to experience poverty. Nationally, more than four in ten female headed households with children experience poverty. In the HOME Consortium area, 5.0% of all households are single women raising children. Boulder has the lowest proportion of single women raising children (3.8%) and Longmont has the highest proportion (7.0%).

Families with Children Ages 18 and Under, Boulder Broomfield Regional Consortium Area, 2010

	Households		Family Households with Children Under 18		Female Householder with Children Under 18	
Geography	Number	Percent	Number	Percent	Number	Percent
Consortium Area (Boulder & Broomfield Counties)	**137,745**	**100%**	**40,125**	**29.1%**	**6,872**	**5.0%**
Boulder (City of)	40,985	100%	7,805	19.0%	1,570	3.8%
Broomfield	20,116	100%	6,782	33.7%	1,258	6.3%
Longmont	32,116	100%	11,160	34.7%	2,242	7.0%
Boulder (County of)	117,629	100%	33,343	28.3%	5,614	4.8%

Source: 2010 ACS 5-year estimates

Income

In this section we explore income and poverty in the Consortium area.

Income and Poverty

This table shows the median household income (not adjusted for inflation) of the three Participating Jurisdictions and Boulder County.

Median Household Income, Consortium Area, 2000 – 2012 (Not Adjusted for Inflation)

Geography	2000	2012	Change	Percent Change
Consortium Area (Boulder and Broomfield Counties)	$55,861	N/A	N/A	N/A
Boulder (City of)	$44,748	$56,206	$11,458	26%
Broomfield	$63,903	$80,483	$16,580	26%
Longmont	$51,174	$57,142	$5,968	12%
Boulder (County of)	$55,861	$67,403	N/A	N/A

Source: 2000 Census, 2012 ACS 5-year estimates

There are a number of challenges in evaluating income data in the Consortium Area. First, while it appears that the City of Boulder has the lowest median income for the area, it is important to realize that a large population of university students lives in off-campus housing in Boulder. These household incomes are included into the median income figure below, skewing the median figure downward. In all likelihood, the median income in Boulder is the highest among the Participating Jurisdictions. Additionally, because Broomfield ceded from Boulder County in 2001, becoming its own county, changes in the income categories at the county level and for the Consortium area cannot be calculated.

Without adjusting for inflation, it appears that incomes in the three Participating Jurisdictions increased by 26% in Boulder and Broomfield and by 12% in Longmont.

However, once adjustments are made for inflation over this time period, the buying power of Boulder County households is decreasing somewhat. Today's dollar has $.33 less value according to the Bureau of Labor Statistics. Once inflation is factored in, median incomes for the Participating Jurisdictions have decreased between 5 percent and 16 percent over the twelve-year period between 2000 and 2012.

Median Household Income, Consortium Area, 2000 – 2012 (Adjusted for Inflation)

Geography	2000 (Inflation Adjusted)	2012	Change	Percent Change
Consortium Area (Boulder and Broomfield Counties)	$74,854	N/A	N/A	N/A
Boulder (City of)	$59,515	$56,206	-$3,309	-6%
Broomfield	$84,991	$80,483	-$4,508	-5%
Longmont	$68,061	$57,142	-$10,919	-16%
Boulder (County of)	$74,295	$67,403	N/A	N/A

Source: 2000 Census, 2012 ACS 5-year estimates, Bureau of Labor Statistics

According to the U.S. Census, 12.1% of consortium area households were living in poverty in 2012. We believe the poverty rate is lower in the City of Boulder where a large share of University of Colorado at Boulder and Naropa University students live off campus, many of which may earn poverty incomes, yet receive unreported support from family members.

Separating out student households from the general population is challenging, particularly in respect to the incidence of poverty. A 2013 housing market analysis prepared by BBC Research and Consulting estimated that "approximately 15,000 students live in private housing." This number does not include Naropa University or Front Range Community College enrollees, nor does it have a way to determine which students receive outside support, which are independent and which live in households above the poverty line. With this said, Boulder Housing Partners, Thistle Communities and other nonprofit housing providers have over 2,100 affordable rental units in Boulder occupied by income-qualified households, a large share of which are occupied by Households at or below 30% AMI.

Poverty Rate, Boulder Broomfield Regional Consortium Area, Colorado and the United States, 2012

	Population		
Geography	General	In Poverty	% In Poverty
Consortium Area (Boulder & Broomfield Counties)	**343,474**	**41,547**	**12.1%**
Boulder (City of)	90,911	19,625	21.6%
Broomfield	55,714	3,413	6.1%
Longmont	85,620	11,702	13.7%
Boulder (County of)	287,760	38,134	13.3%

Source: ACS 2012 5-Year Estimates

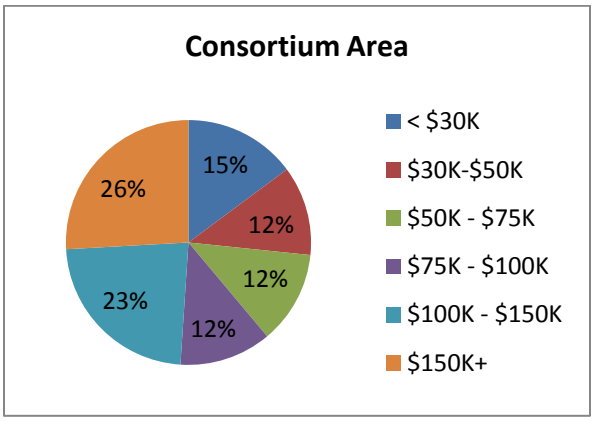
Note: Population for which poverty status is known, not entire population.

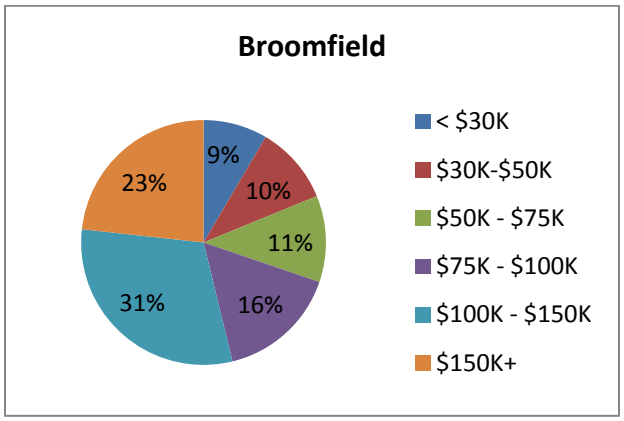
Families and Income

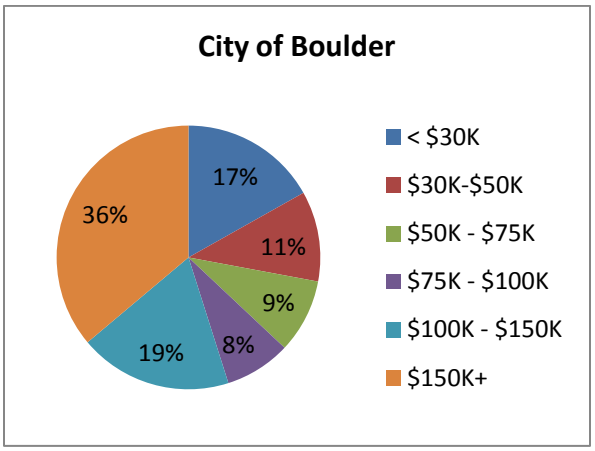
A family's income plays a considerable role in access to housing. We looked at the incomes of family households with children under the age of 18 to determine the role of income in the choosing a community. Based on the information below, the ability of the housing markets in the three Participating Jurisdictions to serve families with children at different income levels vary considerably. With the exception of Longmont, the Participating Jurisdictions' housing markets tend to serve households earning more than $100K. Longmont has the largest proportion of families with children earning less than $30K annually. Boulder's housing market appears to best serve families with children who are wealthier as well as those with the least income. Broomfield's market primarily serves middle to upper income families with children. A mix of market factors and policies underlie these findings.

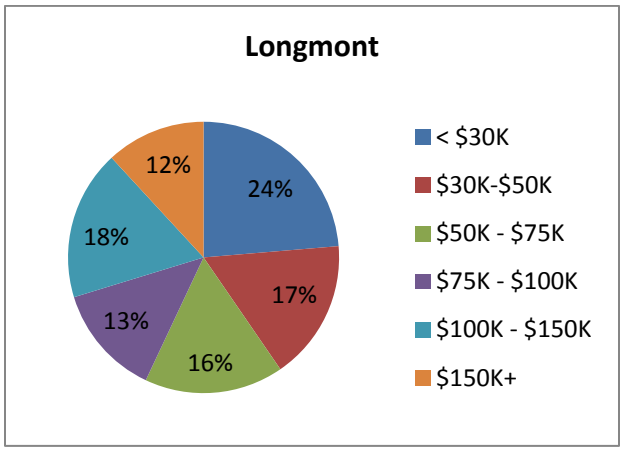
See pie charts, next page.

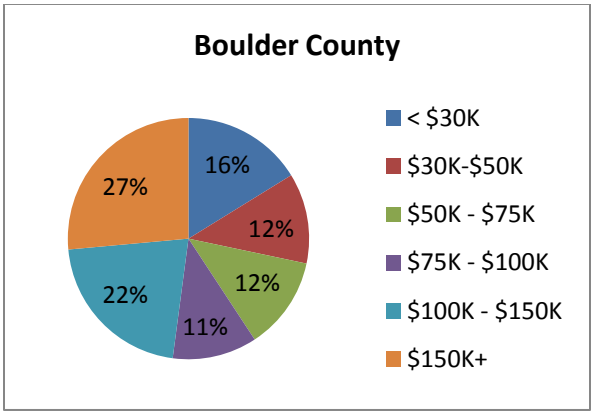
Household Income for Families with Children Ages 18 and Under, Consortium Area, 2012





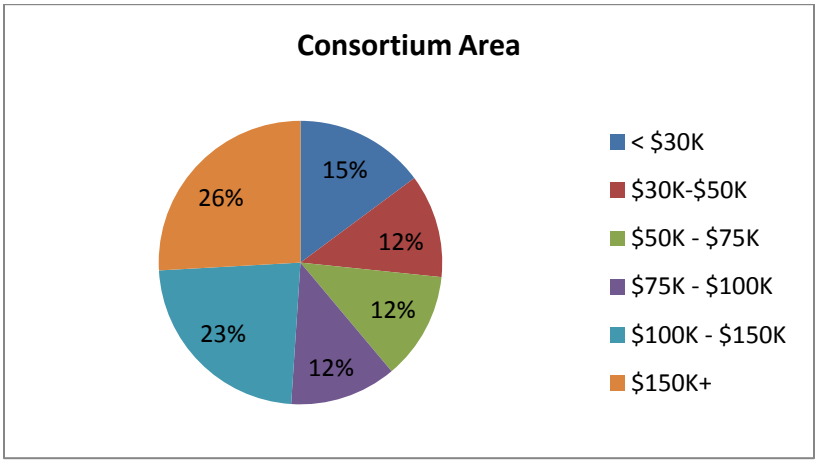


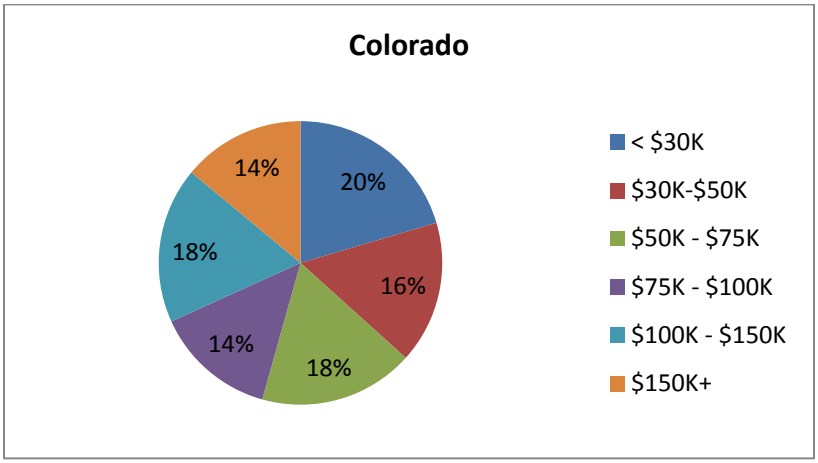


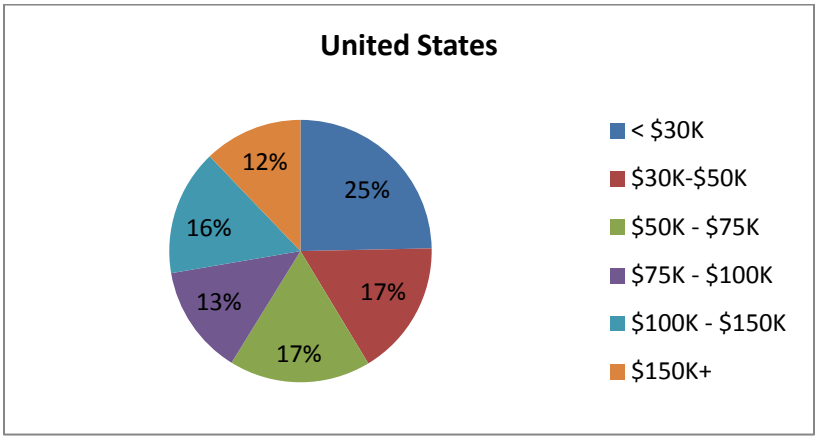


Source: 2012 ACS 5-Year Estimates

Economic, geographic and policy factors in the Consortium Area favor higher income households, including families with children. Around 30 percent of families with children in Colorado and the United States earn more than $100K, while nearly half of Consortium families with children do. The Consortium Area has a 10% smaller share of families with children earning less than $30,000 annually than does the nation and 5% smaller share than does the state.





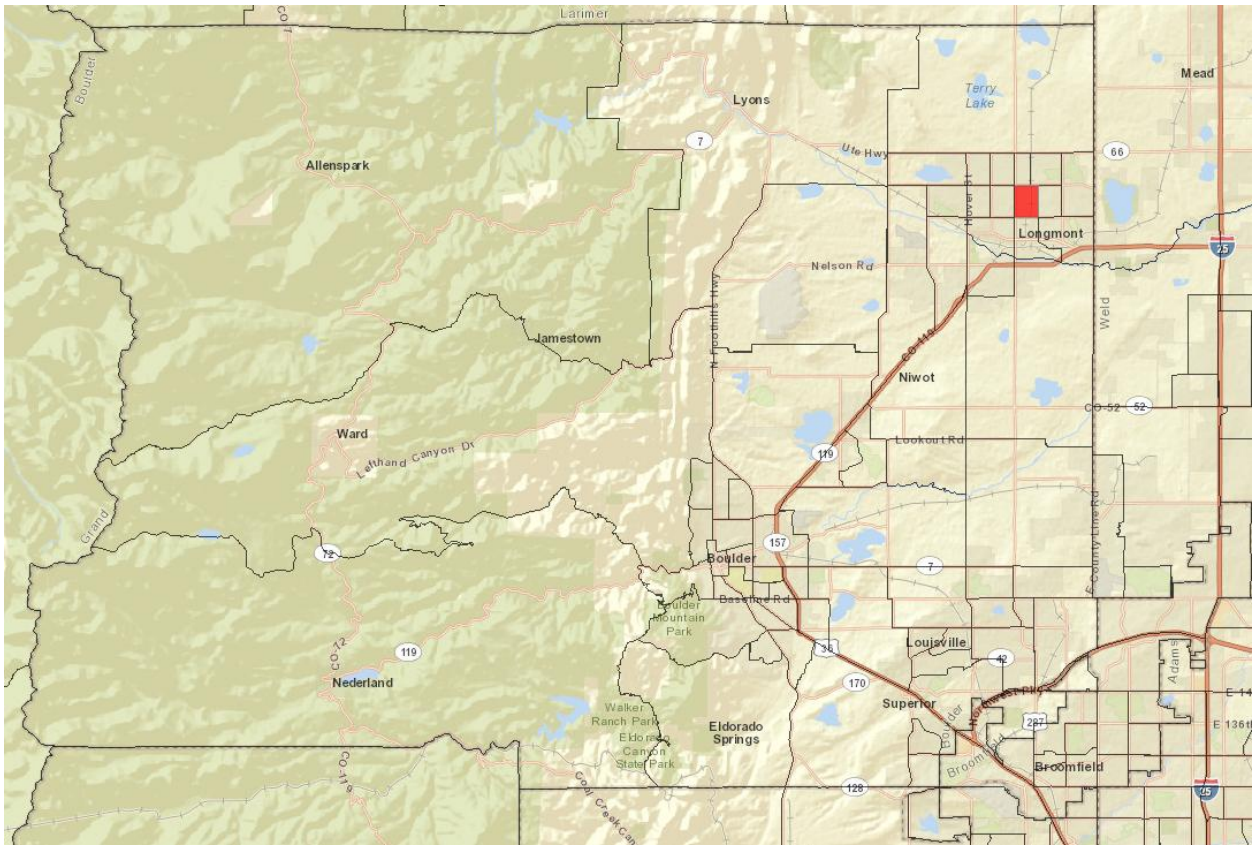


Source: 2012 ACS 5-Year Estimates

Racially and Ethnically Concentrated Area of Poverty

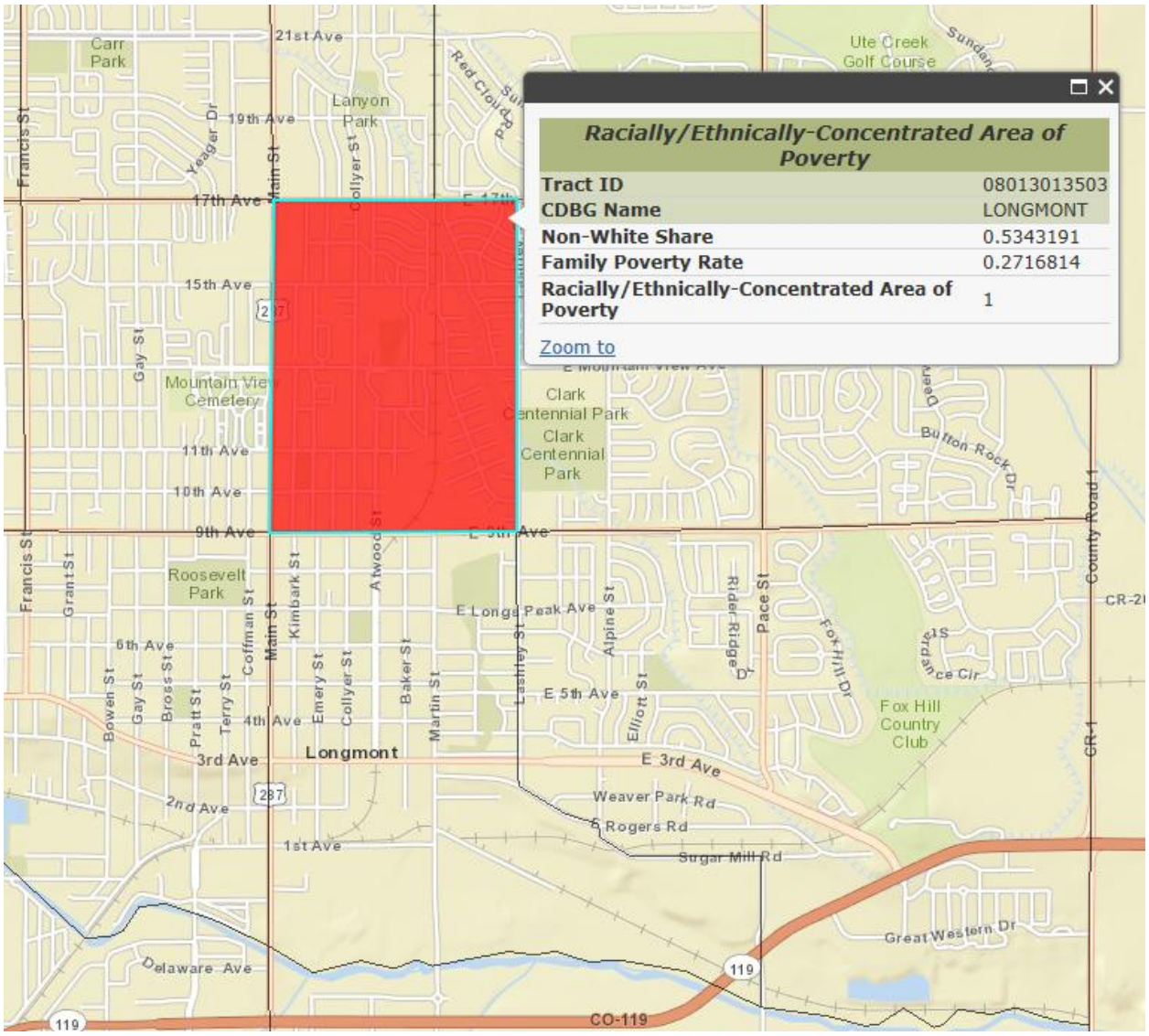
In addition to the previously identified areas of racial and ethnic concentration, we were able to identify one racially and ethnically concentrated area of poverty in the Consortium Area. It is located in the City of Longmont and bounded to the north by 17th Avenue, to the south by 9th Avenue, to the east by the railroad tracks, and to the west by Main Street.

MAP: Racially and Ethnically Concentrated Area of Poverty, Boulder Broomfield Regional Consortium AREA, 2010 (*Consortium-wide view*)



Source: Affirmatively Furthering Fair Housing Mapping Tool

MAP: Racially and Ethnically Concentrated Area of Poverty, Boulder Broomfield Regional Consortium Area, 2010 (*Zoomed in)*)



Source: Affirmatively Furthering Fair Housing Mapping Tool

This tract is one of three with a high concentration of residents of Hispanic origin located just east of Main St. in Longmont. To better understand access, amenities and school quality in this tract, see the earlier discussion under "Hispanic and Non-Hispanic". The overall conclusion regarding the tracts with high concentrations of Hispanic origin residents was as follows and holds for this tract: "Overall, the level of services, amenities and accessibility in these census tracts are quite high. The factor with the greatest variability among tracts is the quality of the schools in and near them. St. Vrain Valley School District offers open enrollment which provides students with the opportunity to seek out higher quality schools."

Employment

In this section, we review employment data in the Boulder Broomfield Regional Consortium area to understand job opportunity in general and to understand the spatial relationship between jobs and housing.

Jobs

This table shows the number of jobs by industry in the Consortium area overall and in the three participating jurisdictions and Boulder County.

Employment by Industry, Boulder Broomfield Regional Consortium, 2012

Industry	Consortium Area		Boulder (City of)		Broomfield		Longmont		Boulder (County of)	
	Number	Share	Number	Share	Number	Share	Number	Share	Number	Share
Agriculture	**2,157**	1%	369	1%	312	1%	687	2%	1,845	1%
Manufacturing	**19,883**	7%	3,298	6%	3,128	10%	6,402	15%	16,755	11%
Trade	**35,266**	13%	6,748	13%	4,337	14%	5,420	13%	18,761	12%
Transportation	**4,773**	2%	762	1%	1,240	4%	1,253	3%	3,533	2%
Information	**9,304**	3%	1,536	3%	1,496	5%	1,169	3%	5,103	3%
Financial Activities	**14,668**	5%	2,498	5%	2,046	7%	1,772	4%	8,352	5%
Educational & Health Services	**66,379**	24%	14,792	28%	6,271	21%	8,331	19%	36,985	23%
Public Administration	**8,213**	3%	1,454	3%	1,250	4%	1,114	3%	4,395	3%
Construction	**14,463**	5%	1,734	3%	1,813	6%	2,998	7%	7,918	5%
Other Services	**97,331**	36%	20,292	38%	8,153	27%	14,126	33%	54,760	35%
All Jobs	**272,437**	**100%**	**53,483**	**100%**	**30,046**	**100%**	**43,272**	**100%**	**158,407**	**100%**

Source: ACS 2012 5-Year Estimates

Findings:

- A little over one third of jobs in the Consortium area are *service* jobs*, health and education services* is the second largest and *trade* is the third largest industry.
- Boulder has the largest share of jobs in the Consortium and is considered a job center in the larger Front Range region.
- Longmont has the largest manufacturing industry with about as many manufacturing jobs as Boulder and Broomfield combined.
- Overall, the economy in the Consortium area is relatively robust and diverse.

Unemployment

This table shows the unemployment rate for the c.

Unemployment, Boulder Broomfield Regional Consortium, 2012

Geography	Population Workforce	Unemployed	% Unemployed
United States	- -	- -	9.3%
Consortium Area (Boulder & Broomfield Counties)	**201,932**	**13,479**	**6.7%**
Boulder (City of)	57,810	4,327	7.5%
Broomfield	31,863	1,817	5.7%
Longmont	46,788	3,516	7.5%
Boulder (County of)	170,069	11,662	6.9%

Source: ACS 2012 5-Year Estimates

Findings:

- Throughout the Consortium area, the unemployment rate was estimated to be 6.7 percent in 2012.
- The highest unemployment rates were in Boulder and Longmont, both with 7.5 percent unemployment.
- Broomfield is estimated to have the lowest unemployment rate; just 5.7 percent.
- Compared to the United States as a whole, with an estimated unemployment rate of 9.3 percent in 2012, unemployment is lower in the Consortium area.
- A typical unemployment rate nationally falls in the range between 5.2 and 6 percent; therefore the local rate is still somewhat high to be healthy.

Job Access

This section explores how people in the Consortium area get to work, how long it takes to get there, and the relative ease of access of those living in affordable housing.

This table shows estimates of the share of workers using different commuting method by community.

Method of Commute, Boulder Broomfield Regional Consortium, 2012

	United States	Consortium Area		Boulder (City of)		Broomfield		Longmont		Boulder County	
Commute	%	#	%	#	%	#	%	#	%	#	%
Workforce	- -	184,980	- -	52,461	- -	29,525	- -	42,624	- -	155,455	- -
Drove Alone	76.1%	124,620	67.4%	27,546	52.5%	22,723	77.0%	31,596	74.1%	101,897	65.5%
Carpooled	10.0%	15,173	8.2%	3,117	5.9%	2,648	9.0%	4,503	10.6%	12,525	8.1%
Public Transportation	5.0%	9,433	5.1%	4,679	8.9%	1,185	4.0%	1,514	3.6%	8,248	5.3%
Walked	2.8%	7,350	4.0%	4,813	9.2%	355	1.2%	895	2.1%	6,995	4.5%
Other Means	1.8%	9,256	5.0%	6,231	11.9%	583	2.0%	1,048	2.5%	8,673	5.6%
Worked at Home	4.3%	19,148	10.4%	6,075	11.6%	2,031	6.9%	3,068	7.2%	17,117	11.0%

Source: ACS 2012 5-Year Estimates

Findings:

- Compared to the United States workers in the Consortium Area drive to work alone less than the nation as a whole, yet workers in Broomfield, located between two major job centers (Boulder and Denver) are more likely to drive alone than the average American.
- Workers in Longmont are more likely to carpool than the average American.
- Workers in the City of Boulder, which offers a diverse array of jobs coupled with regular bus service, a robust network of bike lanes and multimodal paths, are the most likely to use public transportation, walk or use “other means” to get to work.
- There is a high rate of workers working from home in the Consortium area.

This table shows the average travel time of workers in the Consortium area.

Mean Travel Time to Work, Boulder Broomfield Regional Consortium, 2012

Geography	Travel Time (Minutes)
United States	25.4
Consortium Area (Boulder & Broomfield Counties)	**N/A**
Boulder (City of)	19.2
Broomfield	25.8
Longmont	23.2
Boulder (County of)	22.2

Source: ACS 2012 5-Year Estimates

Findings:

- With the exception of Broomfield, the average commute time for workers in the participating jurisdictions and Boulder County is lower than for the average American.
- Boulder, a regional job center, not surprisingly has the lowest commute time.

Job Clusters and Transportation Options

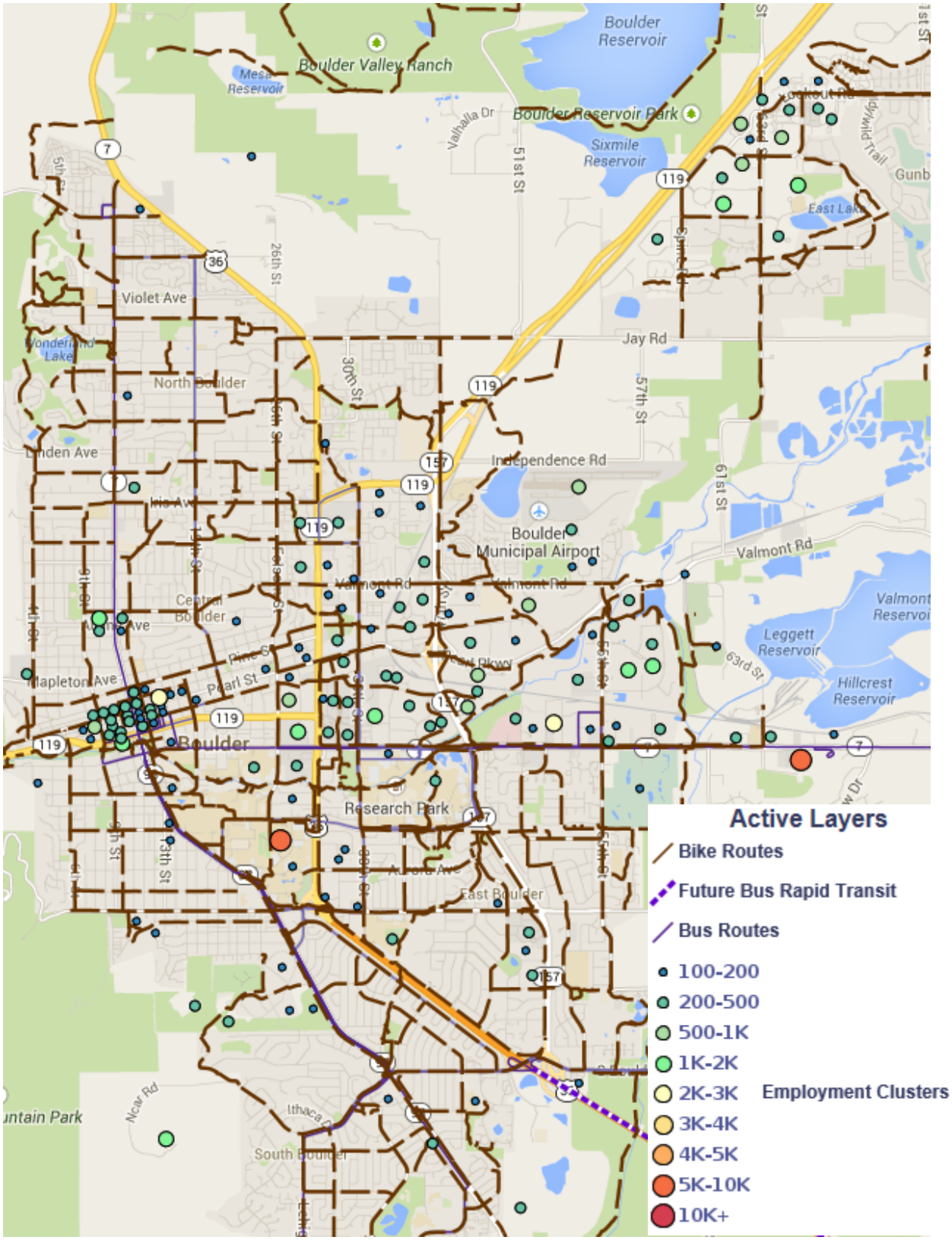
This section of the report explores the spatial relationship between jobs and affordable housing in the Consortium area.

The following maps were obtained from the Denver Regional Equity Atlas, accessed in September 2014. They depict job clusters by location and alternative transportation options within the Boulder Broomfield Regional Consortium area alone.

Findings:

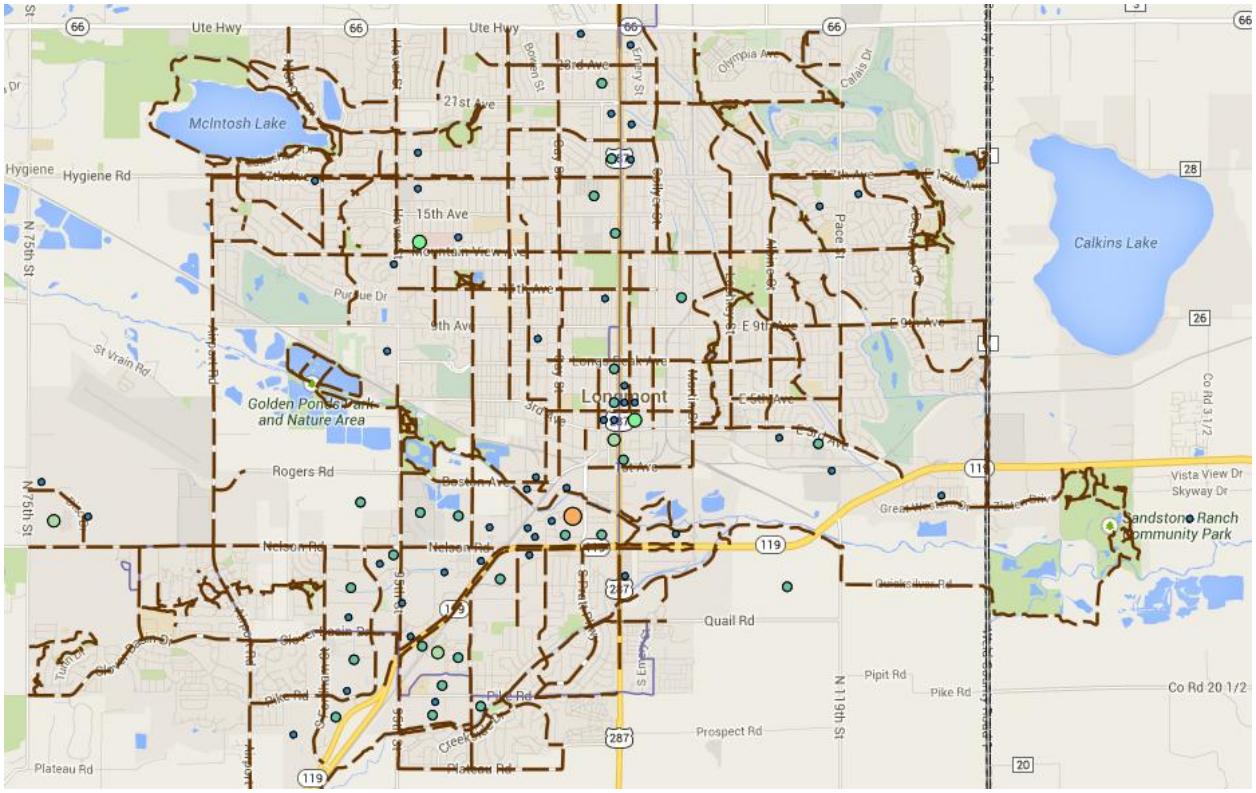
- Boulder and Longmont in particular have extensive trail networks that allow anyone with a bicycle to access a job in the city.
- While Broomfield also boasts a strong network of bike trails the city's job clusters tend to be along the US-36 corridor and a large share of residential neighborhoods are well east of these jobs and not as easily accessible by bike. With that said, affordable housing in Broomfield tends to be located nearer to the 36 corridor. Also much of Broomfield is well serviced by buses.
- These maps do not adequately depict bus lines; however Boulder and Longmont's neighborhoods are generally well serviced by buses.
- The job clusters in south Boulder County (Louisville, Lafayette, Superior) are generally more auto dependent though buses and bike paths service these communities as well.

Job Clusters and Alternative Transportation Options, City of Boulder



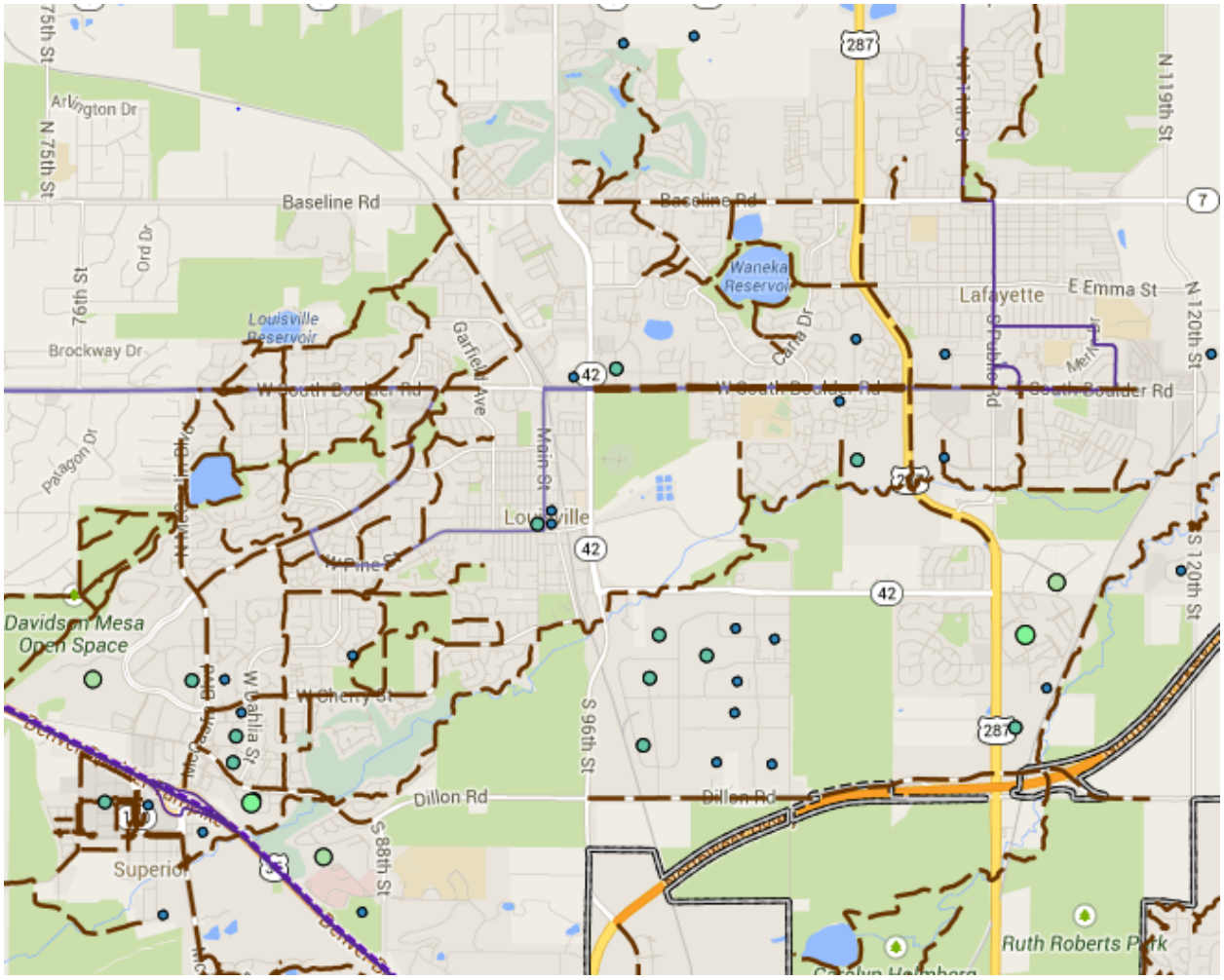
Source: DRCOG Regional Equity Atlas, September 19, 2014

Job Clusters and Alternative Transportation Options, Longmont



Source: DRCOG Regional Equity Atlas, September 19, 2014

Job Clusters and Alternative Transportation Options, Lafayette, Louisville, Superior – South Boulder County



Source: DRCOG Regional Equity Atlas, September 19, 2014

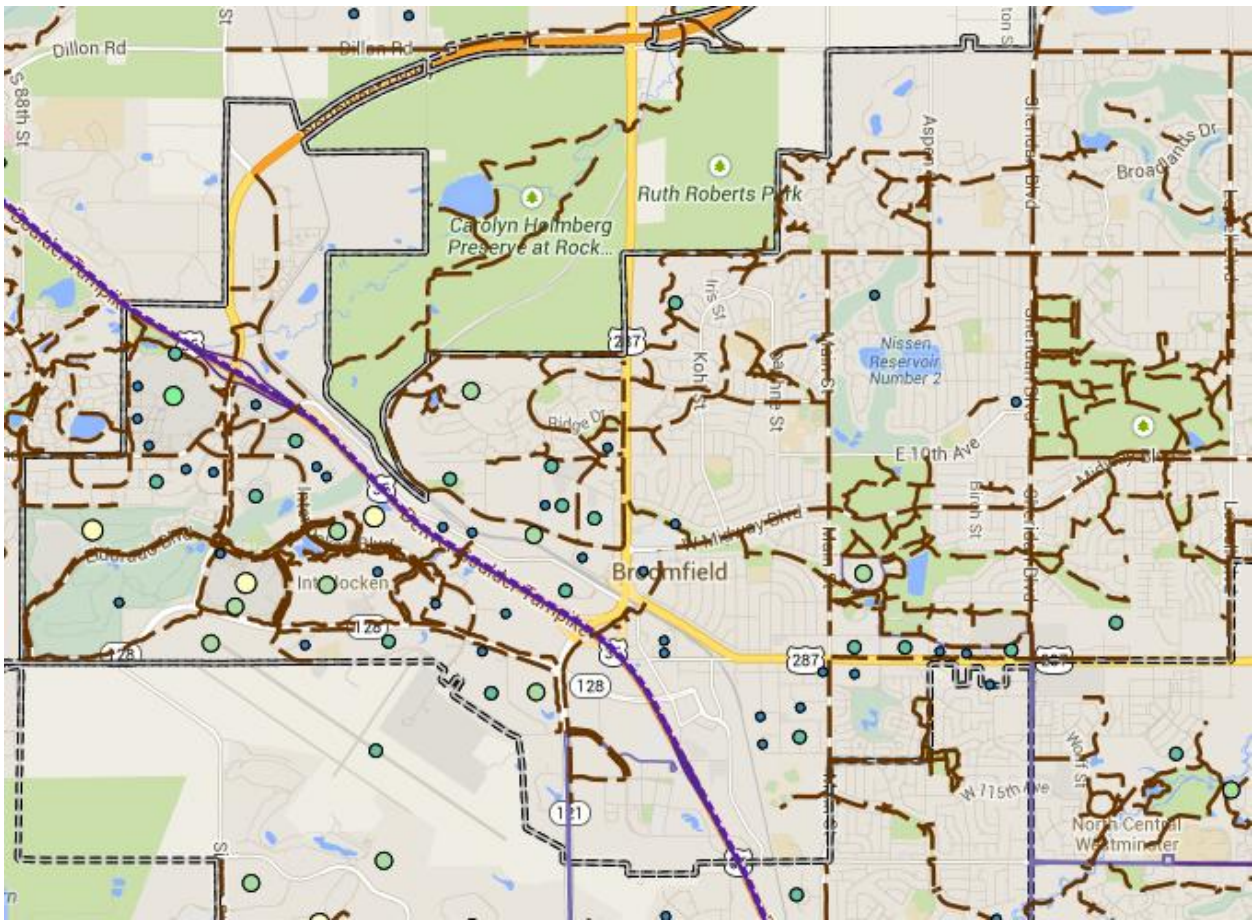
Active Layers

- Bike Routes
- Future Bus Rapid Transit
- Bus Routes

Employment Clusters

- 100-200
- 200-500
- 500-1K
- 1K-2K
- 2K-3K
- 3K-4K
- 4K-5K
- 5K-10K
- 10K+

Job Clusters and Alternative Transportation Options, City and County of Broomfield



Source: DRCOG Regional Equity Atlas, September 19, 2014

Active Layers

- Bike Routes
- Future Bus Rapid Transit
- Bus Routes

Employment Clusters

- 100-200
- 200-500
- 500-1K
- 1K-2K
- 2K-3K
- 3K-4K
- 4K-5K
- 5K-10K
- 10K+

Housing

This section provides an overview of housing in the Boulder Broomfield Regional Consortium and the three participating jurisdictions, exploring the nature of the housing stock, its affordability and the location of affordable housing relative to transit.

Housing Stock

This table overviews the housing stock for the Boulder Broomfield Regional Consortium and the three participating jurisdictions. Data include the number of housing units, vacancy, tenure, bedroom count in housing units, age of the housing stock, and unit type.

Housing Stock Overview, Boulder Broomfield Regional Consortium, 2012

	Consortium Area		Boulder (City)		Broomfield		Longmont		Boulder County	
	#	%	#	%	#	%	#	%	#	%
Total Housing Units	149,657		43,322		22,552		34,988		127,105	
Occupied:	141,436	94.5%	41,076	94.8%	21,375	94.8%	33,406	95.5%	120,061	94.5%
Vacant:	8,221	5.8%	2,246	5.2%	1,177	5.2%	1,582	4.5%	7,044	5.5%
Tenure										
Renter:	50,442	35.7%	20,000	48.7%	6,373	29.8%	12,704	38.0%	44,069	36.7%
Owner:	90,994	64.3%	21,076	51.3%	15,002	70.2%	20,702	62.0%	75,992	63.3%
Bedroom Count										
Studio:	2,896	1.9%	1,550	3.6%	321	1.4%	449	1.3%	2,575	2.0%
1 BR:	18,027	12.0%	8,322	19.2%	2,374	10.5%	3,366	9.6%	15,653	12.3%
2 BR:	37,846	25.3%	12,191	28.1%	4,892	21.7%	10,155	29.0%	32,954	25.9%
3+ BR:	90,888	60.7%	21,259	49.1%	14,965	66.4%	21,018	60.1%	75,923	59.7%
Year Built										
2000 or newer:	24,586	16.4%	3,855	8.9%	7,464	33.1%	7,227	20.7%	17,122	13.5%
1990 to 1999:	31,559	21.1%	4,519	10.4%	5,529	24.5%	7,549	21.6%	26,030	20.5%
1980 to 1989:	23,246	15.5%	7,101	16.4%	2,466	10.9%	4,824	13.8%	20,780	16.3%
1979 or earlier:	70,266	47.0%	27,847	64.3%	7,093	31.5%	15,388	44.0%	63,173	49.7%
Unit Type										
1-unit detached:	92,212	61.6%	18,255	42.1%	15,018	66.6%	22,090	63.1%	77,194	60.7%
1-unit attached:	10,845	7.2%	3,829	8.8%	1,481	6.6%	2,127	6.1%	9,364	7.4%
2 to 9 units:	16,861	11.3%	6,989	16.1%	1,311	5.8%	4,871	13.9%	15,550	12.2%
10 to 19 units:	9,810	6.6%	4,180	9.6%	1,412	6.3%	2,803	8.0%	8,398	6.6%
20+ units:	15,577	10.4%	8,958	20.7%	2,568	11.4%	2,379	6.8%	13,009	10.2%
mobile homes:	4,278	2.9%	1,111	2.6%	733	3.3%	718	2.1%	3,545	2.8%
RVs, Vans, etc.	74	0.05%	0	0.0%	29	0.13%	0	0.0%	45	0.04%

Source: ACS 2012 5-Year Estimates

Findings:

- **Housing Units:** In 2012, there were an estimated 149,657 housing units in the Consortium Area. City of Boulder with 41,076 units is the largest housing market of the participating jurisdictions, Longmont (33,406) is the next largest and Broomfield (21,375) is the smallest of the three PJs.

- **Vacancy:** According to the American Community Survey, 5.8 percent of all housing units were vacant in 2012. A vacancy rate around 5 percent is considered ideal.
    - However, the most recent publicly available Metro Denver Multifamily Vacancy and Rent Survey (Q2 2013) finds the following much lower rental vacancy rates in the Boulder/Broomfield area: Boulder/Broomfield overall (3.8 percent), City of Boulder – not the University Area (3.4 percent), City of Boulder – University Area (0.5 percent), Broomfield (4.5 percent), Longmont (3.6 percent) and Boulder County elsewhere (3.7 percent).
    - When a housing market's vacancy rate is below 5 percent, it is considered a tight market. Tight markets create more opportunity for landlords to discriminate against protected classes through legitimate screening practices (applications, credit checks).
    - Since these figures came out, the Broomfield/Boulder market lost several hundred housing units as a result of a federally-declared national disaster flood event of September 2013.
    - At the same time, the lending and political environment has been more favorable to multifamily rental development than it has in decades. In Boulder, for example, building permits were issued for 878 new housing units in 2013 and as of September 16, 2014, 594 permits for new residential units had been issued.
- **Tenure Type:** In the Consortium area, nearly two thirds of the housing stock is owner occupied. Broomfield has the highest owner occupancy rate (70 percent). In Boulder the mix is about half owner and half renter, driven by university student demand.
- **Bedroom Count:** In the Consortium area, 60.7 percent of housing units have more than three bedrooms, which can serve larger households such as families. Broomfield has a larger share of 3+ bedroom housing units (66.4 percent). Boulder, the most urbanized/least suburban of the communities, has the highest share of 1-BRs and the lowest share of 3-BR units.
- **Year Built:** Throughout the Consortium area, 47 percent of the housing stock was built prior to 1979, the vast majority of which was not subject to accessibility requirements. Boulder has the oldest housing stock and Broomfield has the largest share of new housing units.
- **Unit Type:** In the Consortium area, 61 percent of housing units are 1-unit detached. Broomfield has the highest share of single-family homes in its housing stock and Boulder has the largest share of multifamily projects. Throughout the Consortium area there are 4,278 mobile homes, many of which are preserved through the mobile home (MH) zoning designation.

Housing Affordability

This table overviews the value, cost and affordability of homes in the Consortium area.

Housing Affordability, Boulder Broomfield Regional Consortium, 2012

	United States	Consortium Area #	Consortium Area %	Boulder (City) #	Boulder (City) %	Broomfield #	Broomfield %	Longmont #	Longmont %	Boulder County #	Boulder County %
Home Value (Owned)											
Owner-Occupied Units:		90,994		20,000		15,002		20,702		75,992	
<$100K	24%	4,787	5%	1,201	6%	672	4%	1,147	6%	4,115	5%
$100K - $199K	31%	12,191	13%	1,575	8%	2,440	16%	5,754	28%	9,751	13%
$200K - $300K	18%	21,942	24%	1,995	10%	5,589	37%	7,791	38%	16,353	22%
$300K - $500K	16%	28,735	32%	5,537	28%	4,382	29%	4,893	24%	24,353	32%
$500K +	11%	23,339	26%	9,692	48%	1,919	13%	1,117	5%	21,420	28%
Mortgage Status and Renters											
Occupied Units:		139,171		40,535		21,250		20,702		117,921	
Owner (Mortgage):		68,887	49%	14,055	35%	12,332	58%	15,933	77%	56,555	48%
Owner (No Mortgage):		21,783	16%	5,945	15%	2,670	13%	4,769	23%	19,113	16%
Renter:		48,501	35%	20,535	51%	6,248	29%	12,466	60%	42,253	36%
Median Housing Costs											
Owner (Mortgage):	$1,559	n/a	n/a	$2,118	n/a	$1,852	n/a	$1,640	n/a	$1,907	n/a
Owner (No Mortgage):	$449	n/a	n/a	$548	n/a	$467	n/a	$359	n/a	$487	n/a
Renter:	$889	n/a	n/a	$1,132	n/a	$1,101	n/a	$949	n/a	$1,077	n/a
Cost-Burdened											
Owner (Mortgage):	37%	22,120	32%	4,656	33%	3,393	28%	5,172	32%	18,727	33%
Owner (No Mortgage):	16%	2,257	10%	690	12%	250	9%	460	10%	2,007	11%
Renter:	52%	27,350	56%	13,147	64%	2,556	41%	6,717	54%	24,794	59%

Source: ACS 2012 5-Year Estimates

Findings:

- **Home Values:** Housing in the Consortium area is expensive; in 2012, nearly 60 percent of owner-occupied homes in the Consortium area were valued above $300K compared to just 27 percent of the housing stock nationally. The City of Boulder has the highest share of homes valued over $500k, nearly half of owner-occupied homes. Longmont has the most affordable owner-occupied housing.
- **Owner Housing Costs:** Owners who hold mortgages in the Consortium area pay higher monthly housing costs compared to the nation as a whole ($1,559). In Boulder in 2012, the median mortgage payment was estimated to be $2,118, in Broomfield $1,852, in Longmont $1,640 and in Boulder County as a whole $1,907.
- **Renter Housing Costs:** The median renter housing cost in the participating jurisdictions and Boulder County is higher than the median renter housing cost nationally. The most recent data from the Metro Denver Vacancy and Rent Survey (Q2 2013) revealed average rents of $1,310 in the City of Boulder, $1,192 in Broomfield, $993 in Longmont, and $1,328 elsewhere in Boulder County. The Metro Denver Vacancy and Rent Survey excludes rent restricted housing from its survey.

Housing Accessibility

This table provides a detailed overview of prevalence and use of accessibility features in the Denver MSA, the nearest and geography for which these data are available. These data were not available for the Boulder MSA. There is significant variation in housing markets in the Denver MSA, therefore the further analysis will be needed to determine the relevance to Boulder and Broomfield County.

Housing Accessibility Features, Denver MSA

Accessibility Features in Home	% of Housing Stock	Accessibility Features in Home	% of Housing Stock
Ramps	0.38%	Entry level bedroom	48.46%
Accessibility need	0.05%	Accessibility need	2.05%
Not required	0.33%	Not required	46.41%
Extra wide doors or hallways	9.55%	Entry level bathroom	70.32%
Accessibility need	0.97%	Accessibility need	2.41%
Not required	8.59%	Not required	67.92%
Floors with no steps between rooms	60.70%	Built-in seats in shower	10.22%
Accessibility need	2.98%	Accessibility need	1.20%
Not required	57.72%	Not required	9.02%
Elevators	0.46%	Raised toilets	6.74%
Accessibility need	0.09%	Accessibility need	1.59%
Not required	0.37%	Not required	5.14%
Hand rails or grab bars on steps	19.64%	Handles on doors instead of knobs	20.62%
Accessibility need	1.44%	Accessibility need	1.12%
Not required	18.19%	Not required	19.50%
Hand rails or grab bars in bathroom	15.06%	Handles or levers on sinks	45.79%
Accessibility need	3.99%	Accessibility need	1.83%
Not required	11.07%	Not required	43.97%
Hand rails or grab bars in other areas	2.32%	Roll-out trays/lazy susans in cabinets	30.88%
Accessibility need	0.90%	Accessibility need	0.51%
Not required	1.40%	Not required	30.37%

Source: American Housing Survey, 2011

Findings:

- For each accessibility feature included in this table, the prevalence is higher than the need. This could indicate a housing mismatch wherein people own homes or rent homes with accessibility features but do not use them whereas those who need the features may not live in an appropriately accessible home.
- The highest prevalence of accessibility features in the Denver MSA housing stock are no-step thresholds, entry level bathrooms, entry level bedrooms, handles or levers on sinks and rollout trays or lazy susans in cabinets.
- The least common accessibility features in the Denver MSA housing stock are ramps, elevators and hand or grab rails not located in the bathroom.
- Demand for accessibility features will increase in the near future. As the large baby boomer demographic ages its incidence of disability will increase.

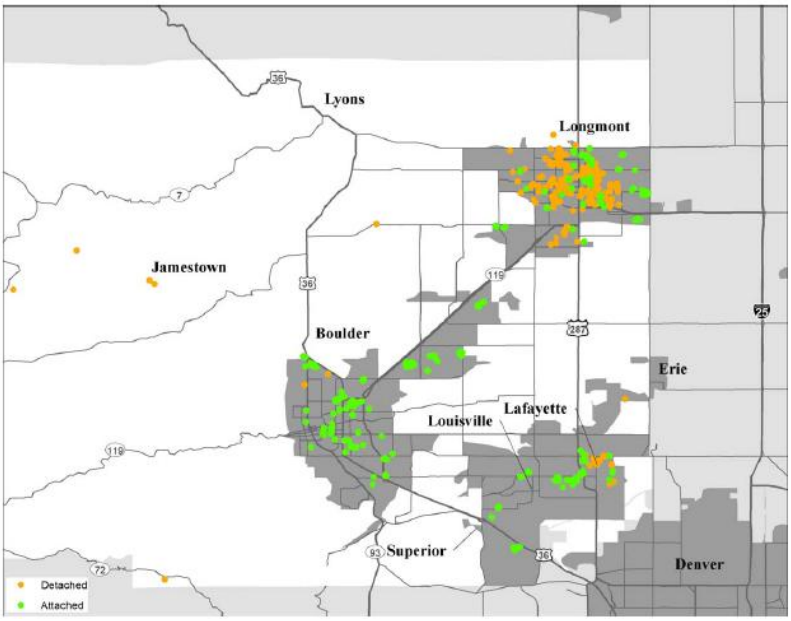
Location of Affordable Market-Rate For-Sale Housing

In preparation for their update to the Consolidated Plan, the City of Boulder commissioned BBC Research and Consulting to prepare a market analysis. This study, completed in July 2013 included a spatial analysis of for-sale homes in Boulder County.

Home Sales Affordable to HUD Low Income 1-Person Household, Boulder County, 2012

Figure 13. Location of Affordable Homes for 1-person HUD-defined Low Income Household (Earning <$45,000)

Source: BBC Research & Consulting and 2012 MLS.

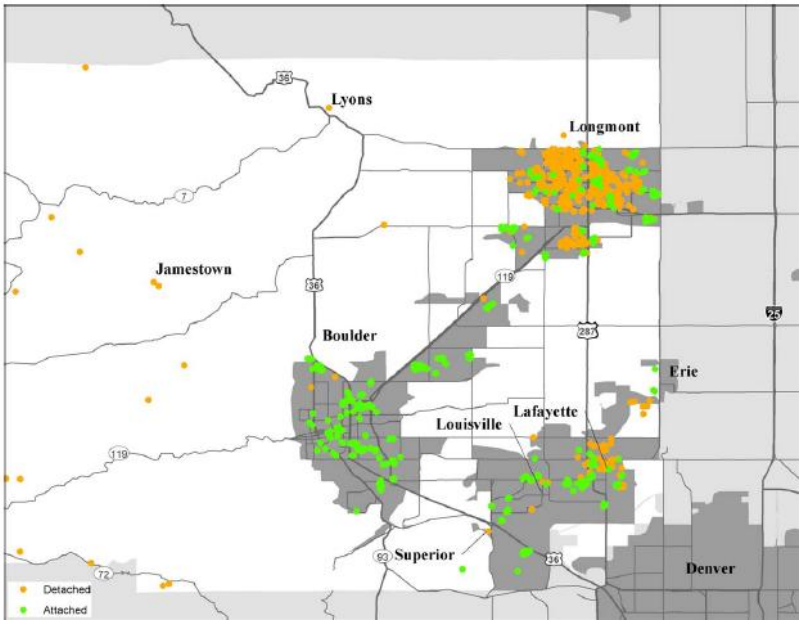


Source: BBC Research and Consulting, Market Analysis July 2013

Home Sales Affordable to HUD Low Income 3-Person Household, Boulder County, 2012

Figure 14. Location of Affordable Homes for 3-person HUD-defined Low Income Household (Earning <$58,000)

Source: BBC Research & Consulting and 2012 MLS.



Source: BBC Research and Consulting, Market Analysis July 2013

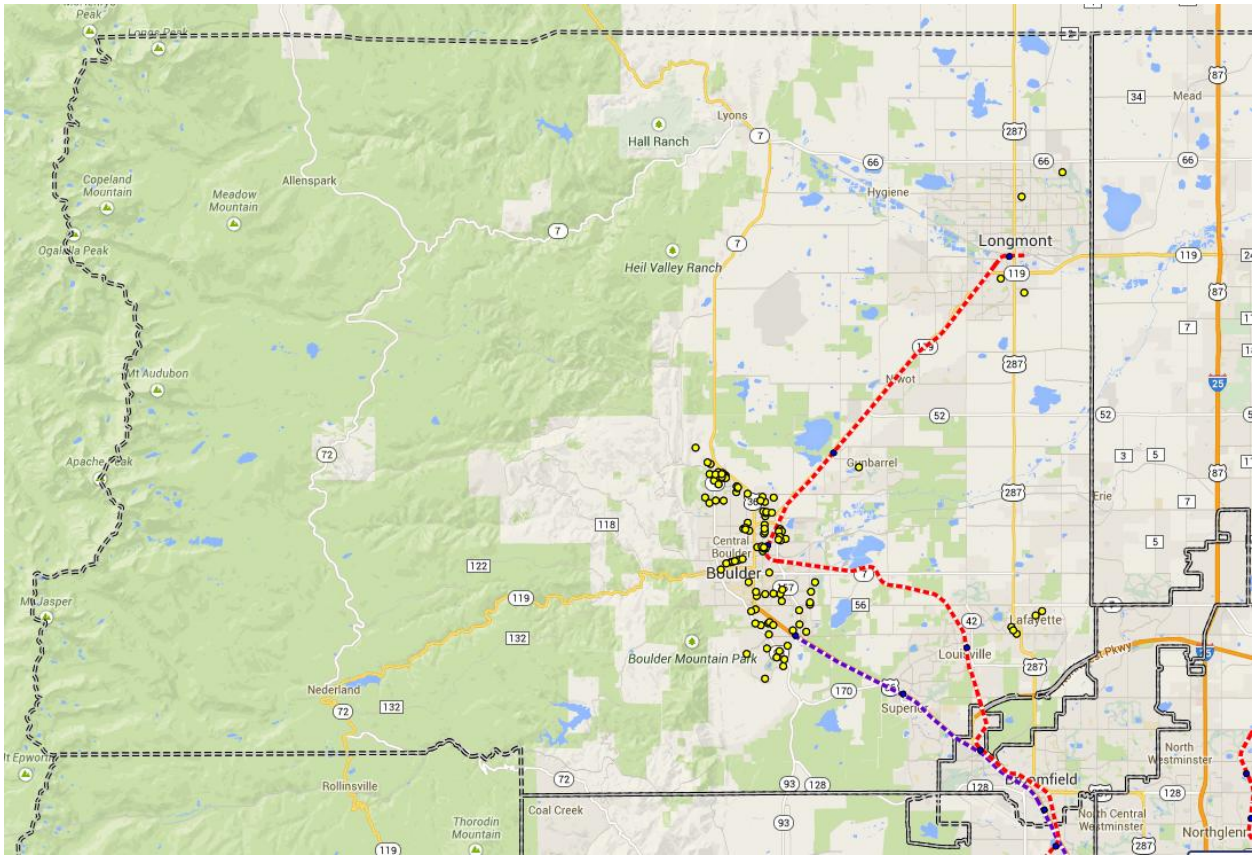
Findings:

- Most detached housing (yellow dots) that sold in 2012 for prices affordable to HUD Low Income households was located in Longmont. Lafayette had the second largest share of affordable homes. A few other homes affordable to HUD Low Income households sold elsewhere in Boulder County.
- In large part, the housing that sold in 2012 for prices affordable to HUD Low Income households located in Boulder, Louisville and Superior was attached (green dots).

Location of Restricted Affordable Owned Homes

Some communities and affordable housing nonprofits provide affordable homeownership opportunities. This map shows the location of restricted affordable owned homes in Boulder County.

Map: Restricted Affordable Owned Homes, Boulder Broomfield Regional Consortium, 2014



Source: Denver Regional Equity Atlas, accessed September 29, 2014

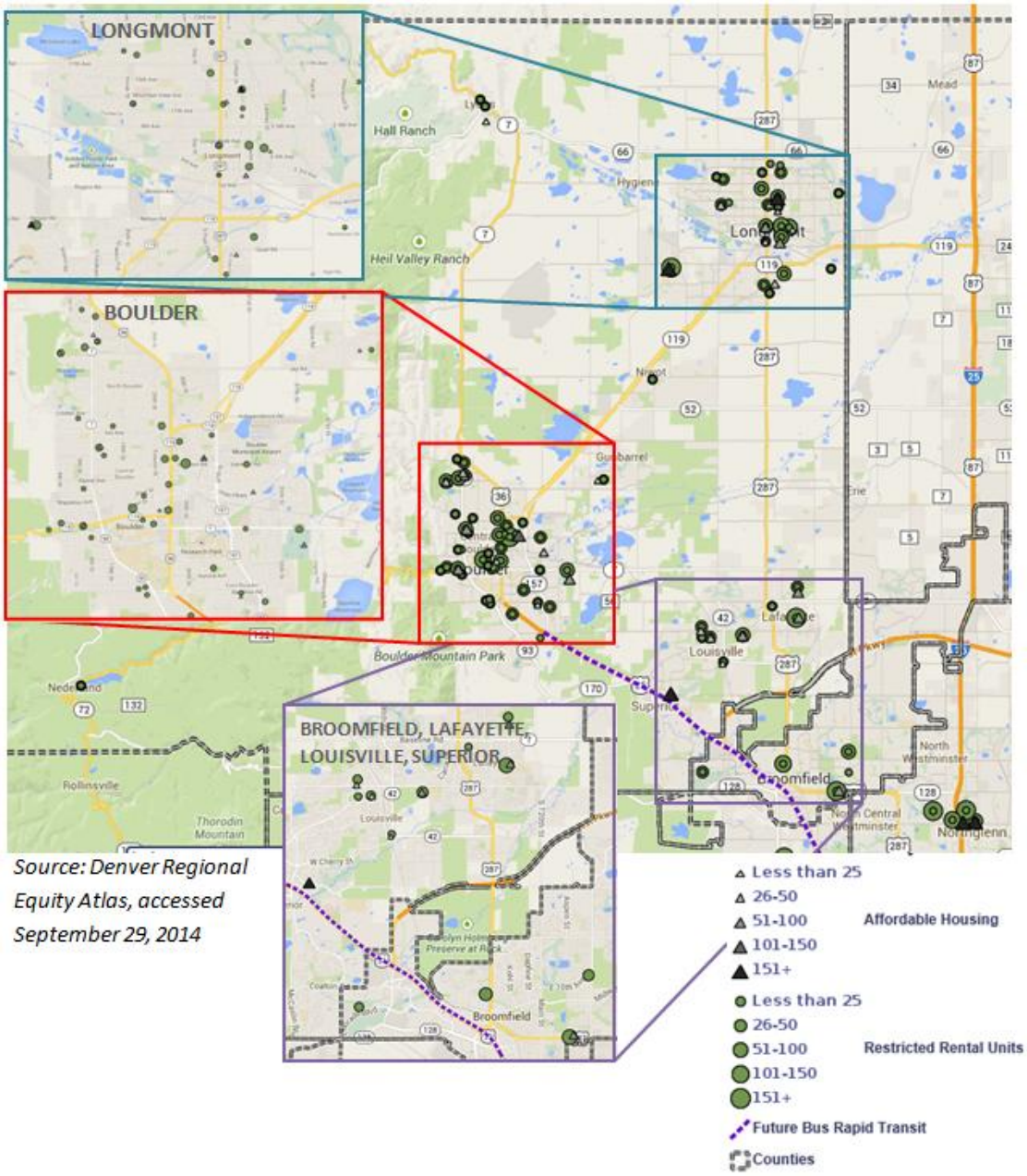
Findings:

- The lion's share of restricted affordable owned homes (yellow dots) are located in the City of Boulder. Most of these homes are deed restricted by the City of Boulder.
- Longmont and Lafayette each have several restricted owned homes.
- There are no restricted affordable owned homes in Broomfield.

Location of Restricted Affordable Rental Housing

Restricted affordable rental housing is housing that is intentionally priced to be affordable as opposed to market housing that happens to be affordable. There are restricted affordable rental housing opportunities located throughout the Consortium area. These maps depict the location of restricted affordable rental housing in the Boulder/Broomfield market area.

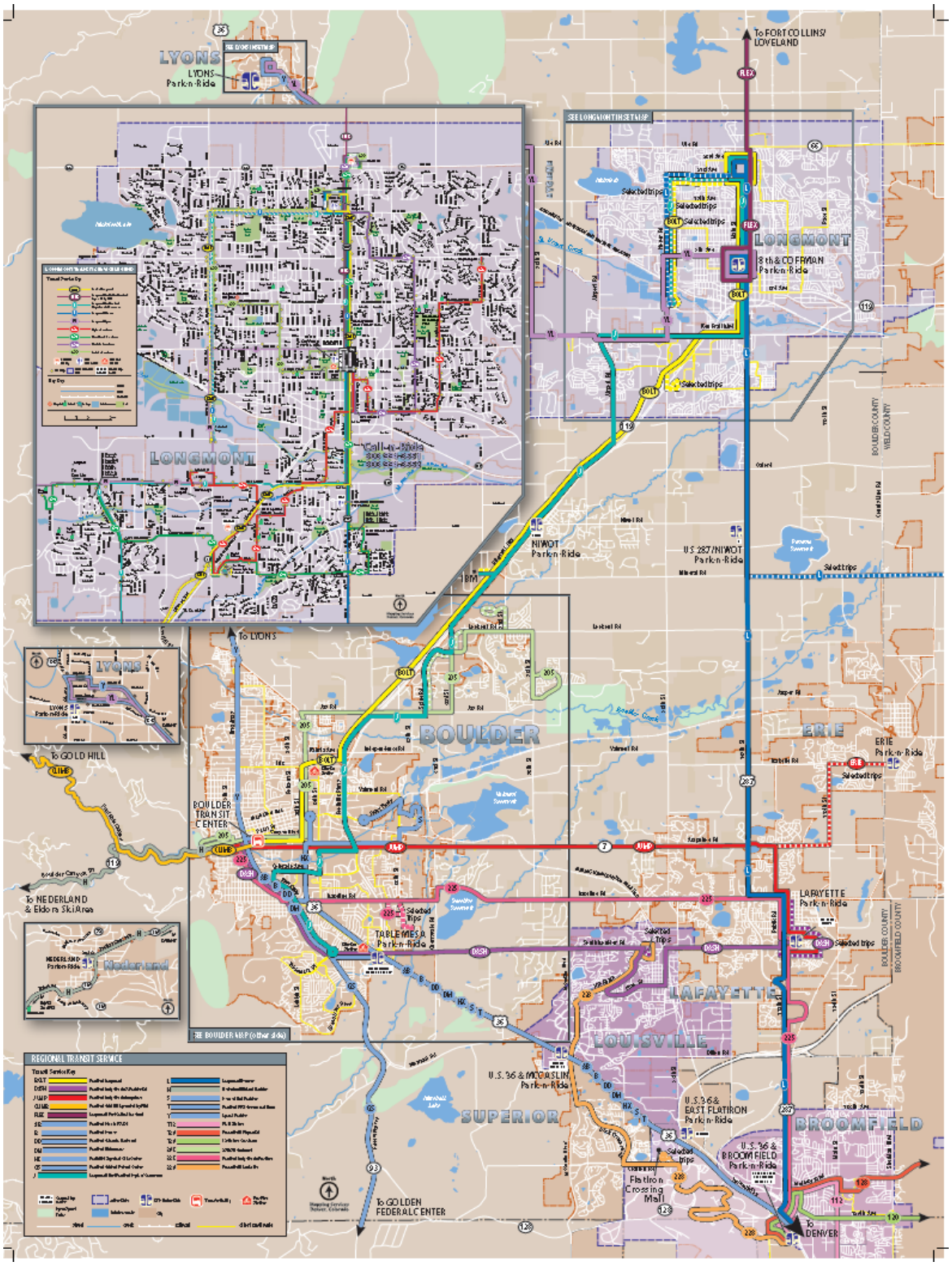
Map: Restricted Affordable Rental Housing, Boulder Broomfield Regional Consortium Area



Findings:

Affordable housing is found in the three participating jurisdictions and in other communities throughout Boulder County.

Map: Public Transportation in the Boulder Broomfield Regional Consortium Area



Source: Boulder County

Efforts to Enhance Access in Boulder and Broomfield County

In addition to a strong public transit system, Boulder and Broomfield counties, including the cities of Boulder and Longmont boast some of the best bike and multimodal path networks in the country, all of which have the effect of enhancing access to jobs and community resources as well as reducing transportation costs. Programs in Boulder and Broomfield counties that allow more residents to access these resources are described here.

- **Eco Pass Program:** An annual transit pass purchased by a company and its employees or a collection of residences. The pass provides unlimited usage of RTD services.
- **Mobility for All:** This Boulder County program provides subsidized transit passes, assisted housing-based Eco Passes, peer/case manager travel training, a bike to transit/earn a bike program and other personalized transportation solutions for people challenged by limited mobility.
- **Free Fare Longmont:** In Longmont, beginning July 2014, all local routes are free.
- **Bus Then Bike:** Local and regional transit centers provide secure bike storage that allow people to bicycle to the regional transit centers.
- **Via** is a mobility-focused nonprofit that offers transportation, travel training, mobility options information and referral.
- **Easy Ride:** The Broomfield Senior Center offers this program to seniors and wheelchair users to promote mobility and access to community resources.
- **RTD Call-N-Ride**: RTD Call-N-Ride is a curb-to-curb transportation service, taking riders to and from destinations within a designated geographic service area. Riders can travel from home to work, to shopping, to doctor's appointments and return home from any other destination within the geographic boundaries of each Call-N-Ride area. Call-N-Ride vehicles are compact vans or small buses and are wheelchair accessible. The service is also designed to connect with many RTD Park-N-Rides and other RTD routes and light rail for travel throughout the metro area.

Supportive Housing for Those Transitioning Out of Institutional Settings

A challenge in many communities is finding affordable and accessible housing for people with disabilities leaving from more to less restrictive and supportive settings.

In Boulder the following are examples of housing to support transitions to greater independence:

- Orchard House is a group home owned by Boulder Housing Partners and managed by Sage Partnership and provides temporary housing for at-risk Boulder County adolescents and young

adults aging out the foster care system. The home provides a transition for those who are exiting the foster care system and transitioning to independent living.

- Attention Homes is a nonprofit that provides opportunities for at-risk youth by offering shelter, community-based living and the teaching of life skills necessary for an independent future. Attention Homes offers Adolescent Residential Care a program that provides abused, neglected, delinquent, troubled and/or recovering teens with temporary residential care and treatment services to help them transition through their crisis and to a long-term and safe placement or emancipation.
- Bridge House's mission is to address immediate survival needs of homeless and working poor individuals and provide resources which lead to employment, housing, personal stability and healing. In 2015 Bridge House will be opening a 48 bed transitional housing project serving homeless adults transitioning out of the shelter system or living on the streets and participating in the nationally recognized Ready to Work program. The facility will provide transitional housing, supportive services, employment training and opportunities. As part of the rehabilitation of the property, Bridge House will be adding an elevator to serve persons with disabilities participating in the program.
- A group of Boulder County service providers and housing authorities are participating in the Colorado Governor's Office Supportive Housing Toolkit in an effort to increase the production of permanent supportive housing units in the Consortium area.
- Imagine! provides group homes throughout the region serving aging individuals with intellectual and development disabilities. In Longmont the following are examples of housing to support transitions to greater independence:
- The Inn Between provides a self-sufficiency program that promotes stability for diverse homeless families and individuals by providing time-limited housing. The self-sufficiency program focuses on empowering individuals by providing a pathway that begins with a home, together with critical services such as individualized comprehensive case management, financial literacy and life skills training. The goal is for our Inn residents to develop the skills, knowledge and confidence for self-sufficient living.
- The Suites was purchased in 2011 by Longmont Housing Authority, to provide supportive services to help meet basic needs and maintain independence. This building provides 70 fully-furnished 1 and 2 bedroom apartments with supportive housing collaborating to address community needs.
- Briarwood Apartments, attached to the Longmont Housing Authority's (LHA) Offices at 1228 Main Street, are 10 studio apartments that were once part of the Briarwood Motel. LHA responded to a need for such units expressed by nonprofit agencies and placed the ten apartments in service. LHA master-leases the units to nonprofit agencies that have placed their clients in the apartments. The 10 units are leased by the OUR Center, Project HOPE, Integrated Treatment Court, Boulder County Mental Health, and the Boulder Shelter/Boulder Housing Partners. The nonprofits provide the supportive case management services.

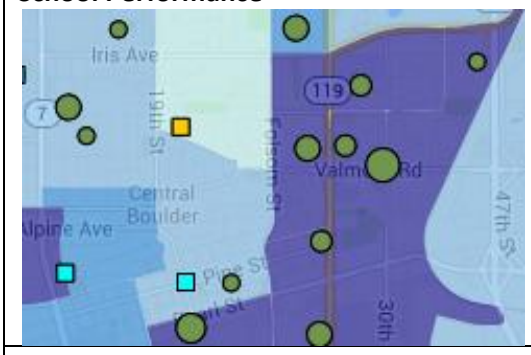
- Longmont Community Treatment Center is a long-terms treatment center that provides services to parolees.

Housing, Income and Access to Quality Public Schools

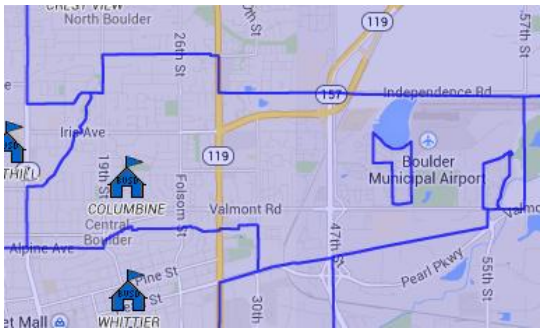
To explore the relationship between the location of quality schools and low income households, using the Denver Regional Equity Atlas we overlaid tract level concentrations of low-income households with the location of rent-restricted housing and public school performance on the maps that follow.

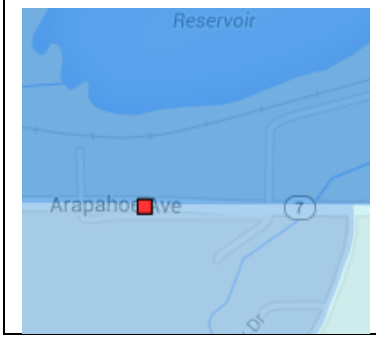
Map: Concentration of Low-Income Households, Affordable Housing and School Performance, Boulder

School Performance



Attendance Area





This is a vocational and alternative high school and does not have an attendance area.

Source: Boulder Valley School District Enrollment Map and Denver Regional Equity Atlas

Legend

School Performance
- Turnaround Plan
- AEC: Turnaround Plan
- Priority Improvement Plan
- AEC: Priority Improvement Plan
- Improvement Plan
- AEC: Default Improvement
- Performance Plan
- AEC: Performance Plan
- Other

Framework

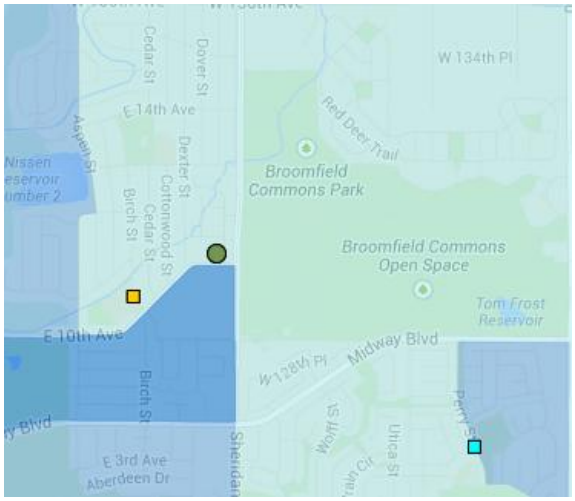
Restricted Rental Units
- Less than 25
- 26-50
- 51-100
- 101-150
- 151+

Low Income Households
- Less than 20%
- 21-40%
- 41-60%
- 61%+

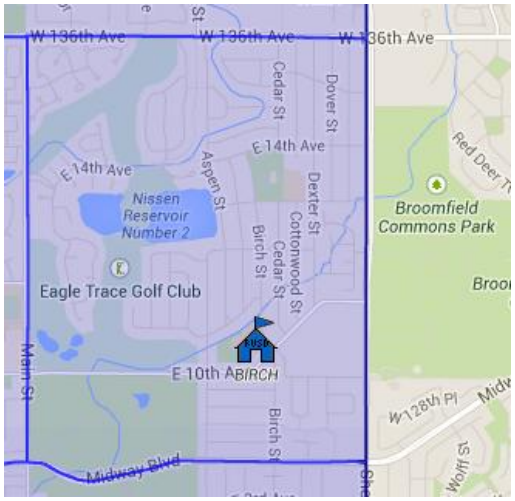
Findings: In Boulder, there is one school with a defined attendance area on an Improvement Plan. The enrollment shed for the school includes a census tract with a high concentration (61 percent or higher) of low income families.

Map: Concentration of Low-Income Households, Affordable Housing and School Performance, Broomfield

School Performance



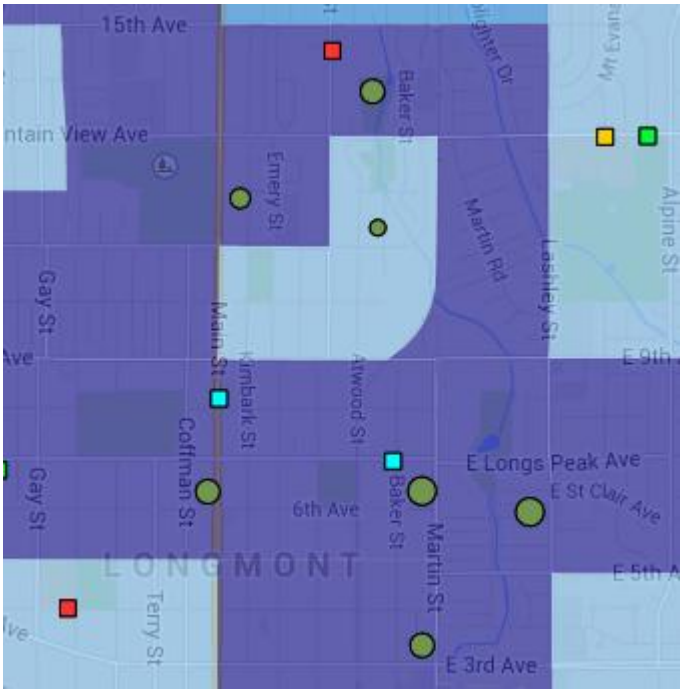
Attendance Area



Source: Denver Regional Equity Atlas
Note: See legend earlier in this section.

Findings: There is one school in Broomfield on an Improvement Plan. The wealth of the census tracts that feed into this school vary from a lower to higher concentration of low-income households.

Map: Concentration of Low-Income Households, Affordable Housing and School Performance, Longmont



Source: Denver Regional Equity Atlas

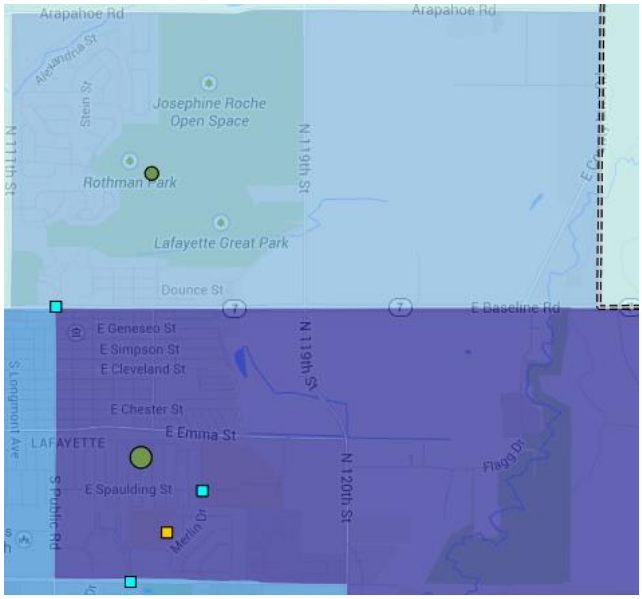
Note: See legend earlier in this section.

Findings:

There are two schools in Longmont on Turnaround Plans and one on an Improvement Plan.

- The Turnaround school located in SW Longmont is in a tract where the attendance boundaries match the census boundaries. In this tract, between 21 and 40 percent of households are low income.
- The Turnaround and Improvement plan schools in N and NE Longmont include in their attendance areas census tracts with high concentrations of low-income households.

Map: Concentration of Low-Income Households, Affordable Housing and School Performance, Lafayette



Source: Denver Regional Equity Atlas
Note: See legend earlier in this section.

Findings:

There is one school in Lafayette on an Improvement Plan. It is located in a census tract with a high concentration of low-income households.

Housing and Environmental Conditions

The two major environmental risks/natural hazards that pose the greatest risks to the housing stock in the Consortium area are floods and wildfires.

Fires
Homes in the foothills and mountainous areas of Boulder County are at greatest risk of fire. In 2010, for example the Fourmile Canyon Fire destroyed 169 homes just west of the City of Boulder in the foothills. Significant resources and expertise are directed toward wildfire mitigation in Boulder County

Flooding
Boulder has long been rated as one of the communities at greatest risk of flood in Colorado and the United States. However, in 2013 unprecedented rains produced a natural disaster that impacted communities throughout Colorado, with more than half of the housing impacts in Boulder County. According to the State of Colorado CDBG-DR Action Plan, version 1.3, it was estimated that 8,429 owned homes and 1,999 rented homes were damaged and 49 owned homes and 28 rental units were destroyed. Impacts were relatively minimal in Broomfield County. Disaster recovery is ongoing at this writing and a countywide Long-Term Housing Committee has formed to coordinate replacement housing efforts, improve community resilience and put better system in place to address sort-term housing needs in the next disaster.

Appendix III. Policies and Practices Impacting Fair Housing Choice

City of Boulder

A comprehensive review of City of Boulder's policies and practices did not reveal any impediments to Fair Housing that directly impact any given protected class. In fact, Boulder is quite progressive in promoting Fair Housing, affordable housing and housing choice and has created additional locally-protected classes.

Commissions and Boards

Board Recruitment Practices. The Boulder Valley Comprehensive Plan identifies the following requirements of advisory board and commission members:

> **Article IX. Advisory Commissions, Section 130. General provisions concerning advisory commissions.** Each of such commissions, including the library commission, shall be composed of five city residents, appointed by the council, not all of one sex, who are well known for their ability, probity, public spirit, and particular fitness to serve on such respective commissions and who are at least eighteen years old and who have resided in the city of Boulder for at least one year immediately prior to their appointment to serve on the commission

Additionally, all board applications feature the following language:

> The City of Boulder believes that a diverse work force adds quality and perspective to the services we provide to the public. Therefore, it is the ongoing policy and practice of the City of Boulder to strive for equal opportunity in employment for all employees and applicants. No person shall be discriminated against in any term, condition, or privilege of employment because of race, national origin, religion, disability, pregnancy, age, military status, marital status, genetic characteristics or information, gender, gender identity, gender variance, or sexual orientation.

Planning Board. The Planning Board reviews and approves certain site and use review applications, studies long range planning matters including the Boulder Valley Comprehensive Plan, and makes recommendations to City Council. It also serves as an advisory board to City Council on applications for annexation and rezoning.

Boulder Design Advisory Board (BDAB). BDAB reviews projects located in the Downtown area that are valued over $25,000 and involve the construction of a new building or exterior work on an existing building. The board provides comments to persons responsible for their design and development and assures compliance with the most recent Downtown Urban Design Plan. The BDAB also reviews projects that require a discretionary review, pursuant to chapter 9-2, and advises on amendments to the most recent Downtown Urban Design Plan. In addition, if its opinion is requested by the city manager, planning board or city council, the board reviews projects located outside of the Downtown.

Landmarks Board. This board reviews all projects located in the Downtown Historic District and landmarked structures located outside the district. The board is responsible for implementing the Historic Preservation Code including land marking and reviewing exterior alterations.

Human Relations Commission. The function of the Human Relations Commission is to foster mutual respect and understanding and to create an atmosphere conducive to the promotion of amicable relations among all members of the city's community. The Human Relations Commission strives to:

- Celebrate and encourage understanding of the diversity of the city's population;
- Encourage education programs with the potential to change ideas and attitudes;
- Conduct research to define key issues in the community in order to suggest appropriate changes to ordinances and policies; and
- Enforce the City of Boulder's Human Rights Ordinance that prohibits discrimination by serving as a quasi-judicial hearing board for human rights ordinance cases.

The activities of the Human Relations Commission promote fair housing awareness, promote city policy in accordance with Fair Housing, and help to address discrimination issues.

To further the city's efforts to ensure protection around Fair Housing the Human Relations Commission offers Community Mediation Services which assists in resolving disputes for City of Boulder residents in the areas of landlord-tenant, roommates, and neighbors.

Boulder Valley Comprehensive Plan (BVCP)

The BVCP is a joint plan between the City of Boulder and Boulder County.

Since 1970, the City of Boulder and Boulder County have jointly adopted a comprehensive plan that guides land use decisions in the Boulder Valley. The BVCP seeks to protect the natural environment of the Boulder Valley while fostering a livable, vibrant and sustainable community. The current plan was first adopted in 1977. Since then, six major updates have been completed: 1982, 1990, 1995, 2000, 2005 and 2010. The BVCP the is set for a major update process in 2015.

The Boulder Valley Comprehensive Plan provides a general statement of the community's desires for future development and preservation of the Boulder Valley. The principle of sustainability drives the overall framework of the Boulder Valley Comprehensive Plan.

The core components of the Boulder Valley Comprehensive Plan are:

- The Boulder Valley Comprehensive Plan policies guide decisions about growth, development, preservation, environmental protection, economic development, affordable housing, culture and the arts, urban design, neighborhood character and transportation. The policies also inform decisions about the manner in which services are provided such as police, fire, emergency medical services, water utilities, flood control and human services.
- The Boulder Valley Comprehensive Plan Land Use and Area I, II, III maps define the desired land use pattern for the Boulder Valley regarding location, type and intensity of development.

The BVCP has a number of provisions that affirmatively further fair housing. Policies to reduce displacement (7.02, Permanently Affordable Housing, 7.08 Preservation of Manufactured Housing, and 7.14, Minimizing Displacement) are found later in this policy discussion:

7.01 Local Solutions to Affordable Housing. The city and county will employ local regulations, policies, and programs to meet the housing needs of their low and moderate income households and workforce. Appropriate federal, state and local programs and resources will be used locally and in collaboration with other jurisdictions. The city recognizes that affordable housing provides a significant community benefit and will continually monitor and evaluate its policies, programs and regulations to further the city's affordable housing goals.

7.03 Populations with Special Needs. The city and county will encourage development of housing for populations with special needs including residences for people with disabilities, populations requiring group homes or other specialized facilities, and other vulnerable populations where appropriate. The location of such housing should be in proximity to shopping, medical services, schools, entertainment and public transportation. Every effort will be made to avoid concentration of these homes in one area.

*7.04 Strengthening Community Housing Partnerships***.** The city will create and preserve partnerships dedicated to the community's housing needs by supporting private and nonprofit agencies that create and maintain permanently affordable housing in the community, and fostering nonprofit and private sector partnerships. The city recognizes the role of the university in the housing market and will encourage the University of Colorado and other post-secondary institutions in their efforts to increase the amount of on-campus housing.

7.05 Strengthening Regional Housing Cooperation. The city and the county will work to enhance regional cooperation on housing issues to address regional housing needs and encourage the creation of housing proximate to regional transit routes. Such efforts include the Regional HOME Consortium and the Ten Year Plan to Address Homelessness.

7.06 Mixture of Housing Types. The city and county, through their land use regulations and housing policies will encourage the private sector to provide and maintain a mixture of housing types with varied prices, sizes and densities, to meet the housing needs of the full range of the Boulder Valley population.

7.07 Preserve Existing Housing Stock. The city and county, recognizing the value of their existing housing stock, will encourage its preservation and rehabilitation through its land use policies and regulations. Special efforts will be made to preserve and rehabilitate existing housing serving low and moderate income individuals and households.

7.09 Housing for a Full Range of Households. The city and county will encourage preservation and development of housing attractive to current and future households, persons at all stages of life and to a variety of household configurations. This includes singles, couples, families with children and other dependents, extended families, non-traditional households and seniors.

*7.10 Balancing Housing Supply with Employment Base***.** Expansion of the Boulder Valley housing supply should reflect to the extent possible current employer locations, projected industrial/commercial development sites, variety of salary ranges, and the demand such developments bring for housing

employees. Key considerations include housing type, mix, and affordability. The city will explore policies and programs to increase housing for Boulder workers by fostering mixed-use and multi-family development proximate to transit, employment or services and by considering the conversion of commercial and industrial zoned or designated land to residential use.

7.11 Incorporate Mix of Housing in Future Service Area. In considering future expansion of the Service Area, the city will identify possible sites for housing that serves low and moderate income households. Designation of land uses in new growth areas will provide for a mixture of housing types and densities in order to meet the diversity of housing needs.

7.12 Conversion of Residential Uses in the Community. The city will evaluate and revise its regulations to reduce the opportunities for the conversion of residential uses to non-residential uses or to require mitigation for residential units lost through the redevelopment of existing housing or the conversion of a residential use to non-residential uses.

7.13 Integration of Permanently Affordable Housing. Permanently affordable housing, whether publicly, privately or jointly financed will be designed as to be compatible, dispersed, and integrated with housing throughout the community.

Advancing Housing Policy with Area Plans

Area plans allow the city to more concretely advance its community priorities. A successful example of the city promoting its housing goals is Transit Village Area Population (TVAP), which envisions a formerly under-utilized area of Boulder as a transit-oriented, mixed use neighborhood that will eventually include an estimated 1,400 to 2,400 housing units.

Housing equity and affordability aspirations for TVAP are captured here:

> *"In order to promote a diverse Transit Village area population and help achieve the city's overall housing goals, the city will offer an incentive for developers in select zones to provide more permanently affordable housing than required. Land that the city owns in the southwest corner of the area will be developed with a higher percentage of affordable housing. All housing will be within walking or biking distance of the regional bus or commuter rail service. The combination of affordable housing and lower cost transportation options may create a more economically diverse population in the area. It also may support a more diverse employment base for the city, as more Boulder service workers may be able to reside in the Transit Village area."* (TVAP, p. 9)

Boulder Revised Code, Title 9: Land Use Regulations

Title 9 of the Boulder Revised Code, 1981, Land Use Regulations, regulates, among other land uses, residential land use in Boulder. The General Provisions Chapter cites desired outcomes in Boulder. Those related to residential development and of interest as context for Fair Housing review include:

- "Promote coordinated sound development, effective use of land, and high quality site planning considering and complementing the city's unique geographic setting, amenities of view, and open space."
- "Prevent overcrowding of land, … unregulated growth, poor quality development…"
- "Encourage innovation in residential development and renewal that meets the growing demand for housing by providing a greater variety in type and design of dwellings and affordability levels."
- "Preserve the character and stability of neighborhoods and conserve property values by encouraging the most appropriate uses of land within zoning districts…"
- "Provide equal opportunity in housing to the handicapped;"

Several of the General Provisions promote housing opportunity, choice, affordability and accessibility.

The follow are elements of Title 9 that have the potential to promote or limit housing choice.

Development Review. Boulder's Development Review was "established in order to provide a uniform and consistent method for evaluating and reviewing all proposals for discretionary review". Though Development Review can discourage poor-quality development and improve the design of buildings, material choices, and energy efficiency standards, enhancing the durability of residential development and reducing total housing costs for inhabitants through energy savings, development review adds to project costs and timelines. Review standards can limit the types of development that may occur in certain areas of the city and may also increase development costs, effectively increasing costs and reducing housing choice. Increased costs as a result of design review may make some housing less affordable and make affordable housing less feasible, limiting housing choice and indirectly impacting protected classes. With that said, there does not, however, appear to be a direct relationship between development review requirements and any single protected class.

Land Use and Zoning. The Boulder County Comprehensive Plan is prepared jointly with Boulder County and most recently updated in 2010. To achieve desired land use outcomes, the city's Modular Zoning System, specifies use, form and intensity throughout the city. On

the one hand, the city's land use and zoning accommodate an array of residential building types, which can encourage choice; however any zone has the potential of eliminating certain housing types. Land use types that encourage more density and choice in Boulder include: several mixed use categories, a manufactured housing category that effectively preserves this housing choice, and medium and high density. Also, the RL-1 (low-density residential) zone requires just 7,000 square feet per dwelling unit, which is not so large as to be seen as exclusive, while the RH-1 (high-density residential) zone allows up to 27.2 dwelling units per acre. See the discussion of height limits under the Growth Management topic below to better understand allowable units in high-density residential zones.

Occupancy Limits.
The Boulder Revised Code, 1981 limits the number of unrelated persons that can share a dwelling unit in low-density residential areas to no more than three unrelated persons and in medium to high-density residential areas to no more than four unrelated persons. A family may cohabit with two unrelated "roomers".

Definition of "Family". The Boulder Revised Code, 1981 has an expansive definition of family:

> "Family" means the heads of household plus the following persons who are related to the heads of the household: parents and children, grandparents and grandchildren, brothers and sisters, aunts and uncles, nephews and nieces, first cousins, the children of first cousins, great-grandchildren, great-grandparents, great-great-grandchildren, great-great-grandparents, grandnieces, grandnephews, great-aunts and great-uncles. These relationships may be of the whole or half blood, by adoption, guardianship, including foster children, or through a marriage or a domestic partnership meeting the requirements of Chapter 12-4, "Domestic Partners, " B.R.C. 1981, to a person with such a relationship with the heads of household.

This definition is intended to comply with Fair Housing and ensure that the city's code does not discriminate against a particular category of people or lifestyle and ensures that nontraditional families and variations on the nuclear family can find housing throughout the city.

Inclusionary Housing. The City of Boulder's Inclusionary Housing (IH) requires that all new residential development contribute at least 20% of total units as permanently affordable housing. Options for meeting this requirement include providing the permanently affordable units on-site, dedicating off-site newly constructed or existing units as

permanently affordable, dedicating vacant land for affordable unit development or making a cash contribution to the Affordable Housing Fund in lieu of providing affordable units (Cash-in-lieu). Over 400 units targeted to moderate-income households have been built in Boulder directly through the Inclusionary Housing program. This program promotes housing choice and affordability in Boulder.

Affordable Housing Fund (AHF). The City of Boulder's affordable housing funds are used to build, rehabilitate or acquire affordable housing. They are a mix of federal HOME and CDBG funds and local Community Housing Assistance Program (CHAP) and AHF. Sources of the local funds include: property and sales tax revenue, Inclusionary Housing cash-in-lieu contributions and the Housing Excise Tax. It is estimated that annually over $3 million is distributed to support affordable housing development and preservation. This fund plays a significant role in promoting housing choice and affordability in Boulder and benefits a variety of vulnerable populations, including those identified as protected classes.

Accessory Dwelling Units (ADUs). ADUs can promote Fair Housing by providing more, often affordable, housing in a community. Accessory dwelling units can also offset mortgage costs for the owner of the principal dwelling unit and a disabled homeowner can exchange the use of the accessory unit for needed care services or home maintenance assistance. Boulder has had an ADU ordinance in place since 1982; however this ordinance has only produced a little over 200 accessory units. A number of factors are thought to limit the potential of this ordinance. To meet its full potential to create more housing choice and affordability, aspects of this ordinance will need to be amended.

Group Homes. Group homes increase housing choice and create opportunities for people with support needs to live in a community. In Boulder, group homes are an allowable use and are also defined broadly:

> "Group home facility" means a facility providing custodial care and treatment in a protective living environment for the handicapped or the aged person. This category of facility includes, without limitation, group homes for persons who are sixty years of age or older, group homes for the developmentally disabled or mentally ill, drug or alcohol abuse or rehabilitation centers, and facilities for persons with acquired immune deficiency syndrome (AIDS) or human immunodeficiency virus (HIV) infection."

The group home dispersal criteria, B.R.C. 1981 9-6(d)(2), was not written with the intent to discriminate or have a discriminatory impact, but to prevent an institutionalized setting through overconcentration of group homes in one area as that could adversely affect

individuals with disabilities and would be inconsistent with the objective of integrating persons with disabilities in the community

The Boulder Revised Code In order to prevent the potential creation of an institutional setting by concentration of group homes in a neighborhood, no group home facility may locate within three hundred feet of another group home facility, but the city manager may permit two such facilities to be located closer than **three hundred feet** apart if they are separated by a physical barrier, including, without limitation, an arterial collector, a commercial district, or a topographic feature that avoids the need for dispersal.

Growth Management

There is a long history of growth management practices in Boulder. In 1959 a “blue line” was established beyond which city water would not be extended. In that same year PLAN Boulder County, a strong citizens lobby interested in land preservation, formed. And in 1967, Boulder citizens became the first in any U.S. city to pass an open space tax to support the permanent dedication of land as open space, a practice that continues to today. The city’s growth management practices enhance a number of aspects of life in Boulder and preserve natural habitat and agricultural land; however, these practices limit the development potential of the land, including for housing.

Open Space Preservation: Over 45,000 acres within the City have been preserved as open space. The two major implications on housing choice have been a decrease in housing affordability and choice because of less available land and what is termed “leap frog development" in which in-commuters must travel farther - across open space from other communities - to access jobs and services in Boulder. Leap frog development adds transportation costs for those who must commute. It is estimated that 59,000 people commute to Boulder for work. According to a robust 2014 Housing Choice Survey, approximately half of in-commuters would choose to live in Boulder.

Building Height Limits and the Urban Growth Boundary (Urban Growth Boundary): The maximum building height limit in Boulder (55 feet) and the use of an Urban Growth Boundary (a land use planning tool to control growth at the edge of a city) limit how much new development – residential and otherwise – can occur in Boulder’s planning area.

Residential Growth Management System (RGMS): “A residential building permit management system that provides for a long-term rate of growth in the city no greater than one percent per year in an effort to ensure the city's ‘unique environment and its high

quality of life'." (Ch. 9. Land Use Regulation). There are a number of allowances made in the Boulder's RGMS (e.g. affordable housing units) that have had the effect of loosening the effect of the RGMS.

Building Code

Building codes are particularly important for those with disabilities because the Americans with Disabilities Act (ADA), the Fair Housing Act (FHA) and Colorado Revised Statutes 9-5 all require that new construction meet a base level of accessibility and certain portion of new units are accessible and visitable. The City of Boulder has adopted the International Building Code (IBC) 2012. The IBC is recognized by the Department of Justice as a "safe harbor" for accessibility since compliance with the IBC has been demonstrated to fulfill the requirements of the Fair Housing Act.

Transportation Policies that Promote Access

2010 Boulder Valley Comprehensive Plan

The Boulder Valley Comprehensive Plan contains the following policies that guide transportation implementation in the City of Boulder and Boulder County.

Policies

6.04 Regional Cooperation. The city and county will work to develop regional consensus for multimodal improvements to regional corridors, and work with the Colorado Department of Transportation and the Regional Transportation District (RTD) to develop high quality, high frequency transit service between the communities of the region and between centers of employment and housing.

6.05 Accessibility. The city and county will develop a complete all-mode transportation system that accommodates all users, including people with mobility impairments, as well as youth, older adults and low income persons. Efforts should focus on giving people options to live well without a car and may include prioritizing affordable public transportation and transit passes.

6.06 Mobility Services The city and county will increase their support for mobility services for older adults and people with disabilities to reflect the expected increases in these populations.

City of Boulder Transportation Master Plan

In August 2014, the City of Boulder published the update to the *Transportation Master Plan (TMP)*, which spells out priority policies and practices in regards to transportation.

Overall, the City of Boulder has a progressive approach to transportation, with one of the premier biking and multimodal networks in the country which provide low cost access throughout the community. Additionally, we identified the following actions as particularly supportive of access for protected classes:

Actions

Increase Accessibility for All

- Update the Transportation Division's ADA Transition Plan for inclusion in the city-wide Plan
- Celebrate 25th Anniversary of the American's with Disabilities Act (ADA) through a Council Proclamation and community event
- Update the sidewalk missing links program to include a city-wide assessment of project needs and guide prioritization of future capital projects
- Establish a Community Accessibility Coalition to understand and prioritize initiatives to increase mobility for people with disabilities

Improve First and Final Mile Multimodal Access

- Explore options for installing a Bus then Bike station at Boulder Junction

Increase Access to Eco Pass

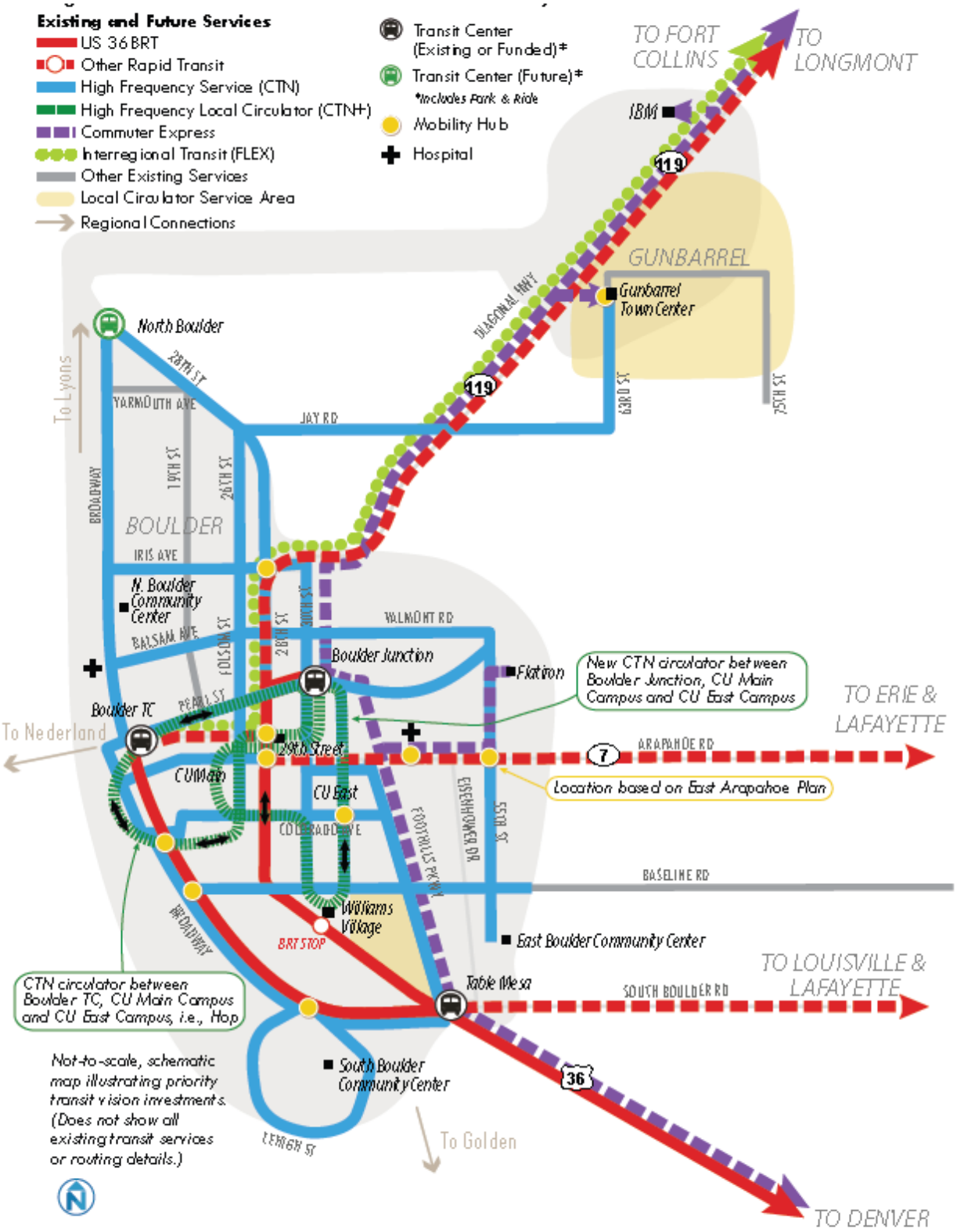
- Continue to expand the existing Business and Neighborhood Eco Pass Programs and opportunities for mixed use district Eco Pass, while continuing to explore implementation options for Community-wide Eco Pass Program in conjunction with Boulder County and RTD
- Partner with Boulder Housing Partners (BHP), Thistle Communities and the City's Affordable Housing Program to increase access to the Eco Pass for low income households

The following is a plan for the location of future transit, included in the TMP:

Figure 5-9

Boulder Renewed Transit Vision

Schematic of Priority Transit Corridors



Note: This map does not directly illustrate all services or routing details currently in place. A map of the existing transit system can be found on the City of Boulder **website**.

Displacement Prevention Policies and Activities

Boulder Valley Comprehensive Plan

The Boulder Valley Comprehensive Plan has several policies that explicitly serve to reduce the displacement of vulnerable and low-income residents and the housing that supports housing choice for these residents.

7.02 Permanently Affordable Housing. The city will increase the proportion of permanently affordable housing units to an overall goal of at least ten percent of the total existing housing stock through regulations, financial subsidies and other means. City resources will also be directed toward maintaining existing permanently affordable housing units and securing replacements for lost low and very low income units.

7.08 Preservation and Development of Manufactured Housing. Recognizing the importance of manufactured housing as an option for many households, the city and county will encourage the preservation of existing mobile home parks and the development of new manufactured home parks, including increasing opportunities for resident-owned parks. Whenever an existing mobile home park is found in a hazardous area, every reasonable effort will be made to reduce or eliminate the hazard, when feasible, or to help mitigate for the loss of housing through relocation of affected households.

7.14 Minimizing Displacement. The city will evaluate its policies and regulations in order to minimize the negative effects of displacement on low income persons when housing sites are redeveloped by the private sector. Available relocation assistance options in the community will continue to be offered to displaced, low-income persons.

Permanent Affordability Covenants

The City of Boulder has a “10% Goal”, by investing in resources and creating income streams to support the development and preservation of affordable housing units. To protect against the loss of affordability restrictions (through sale, foreclosure, default) the city records permanent affordability covenants, promissory notes and deeds of trust on affordable housing. These legal instruments notify the City of sales or other transactions that could compromise the affordability of the property and provide the city with the opportunity to intervene in the case of sale or to cure in the event of default/foreclosure of affordable units.

Adherence to the URA

In addition, due to its use of federal funds (CDBG, HOME), the City strictly adheres to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA). The URA provides uniform, fair and equitable treatment of persons whose real property is acquired or who are displaced in connection with federally funded projects; ensures relocation assistance is provided to displaced persons to lessen the emotional and financial impact of displacement; and ensures that no individual or

family is displaced unless decent, safe, and sanitary housing is available within the displaced person's financial means.

Fair Housing Enforcement and Education

Fair Housing: Housing Authority and Other Affordable Housing

The City of Boulder enforces Fair Housing laws by conducting training, outreach and compliance monitoring. All federally funded housing projects are monitored on a regular basis to ensure compliance and to verify that staff is properly trained on Fair Housing laws. Monitoring includes a review of the grantee's non-discrimination policy, tenant selection plan, affirmative marketing plan, MBE/WBE procurement and outreach, use of FHEO language and logos on handbooks, manuals and program literature, collection of beneficiary data.

Fair Housing: Homeownership Program

Also, to help ensure the City of Boulder Affordable Homeownership Program is in compliance with the federal Fair Housing Act, the Division of Housing plays a direct role in the enforcement of deed restrictions requiring open marketing and a fair selection process for affordable units. The city actively promotes fair housing opportunity and publishes information and materials such as the Boulder County Homeownership Programs Common Application, homeowner and buyer program guides, and Open Marketing Procedures, which include the Fair Housing logos and specifically state the intention of no discrimination of protected classes in housing. Staff members have received fair housing training, including training from HUD, and have years of experience developing and implementing affordable housing programs and promoting fair housing opportunity.

City and County of Broomfield

A comprehensive review of City and County of Broomfield's policies and practices did not reveal any impediments to Fair Housing that directly impact any given protected class.

Commissions and Boards

Planning and Zoning Commission. The Planning and Zoning Commission members apply for a position, are interviewed and appointed by the City Council. The role of the Commission is to review, approve and make recommendations to City Council on new development projects or modifications to development plans. All residents of Broomfield may apply for a Commission position.

Broomfield Comprehensive Plan

Goals in the Broomfield Comprehensive Plan (Chapter III- J) that enhance housing choice and affordability include:

- Encourage private investment aimed at rehabilitation and enhancement of older, existing housing
- Encourage adequate supply of affordable housing for lower-income residents
- Diversify the housing types for home ownership options
- Encourage development of housing for residents with special needs

Land Use Regulations

City and County of Broomfield staff summarized key areas of their land use regulations and zoning code relevant to fair housing below.

Accessory Dwelling Units. Land use regulations state that single family homes are permitted a boarder and can create living space for such within the home.

Group Homes. Group homes are considered a household group and are permitted in single-family neighborhoods without a separate review process.

Broomfield Zoning Code. The Broomfield zoning code (Sec 17-04-202) defines the occupancy limits as:

Definition of Family. 17-04-130 Family.

(A) *Family* means any one of the following:

(1) One person living alone;

(2) Two or more persons all of whom are related by blood, marriage, or legal adoption, together with up to four children who may not be related to any or all of the other residents but who are under the care and supervision of the adult family head; or

(3) A group including not more than two adults, together with any number of children, related by blood or legal adoption to at least one of the adults.

(B) As used in this section, an *adult* means a person eighteen or older, and child means a person under the age of eighteen.

(C) A family shall not include more than one person required to register as a sex offender pursuant to Section 18-3-412.5, C.R.S., unless related by marriage or consanguinity. *Family* shall not include any group of individuals who are in a group living arrangement as a result of criminal offenses. (Ord. 703 §3, 1986; Ord. 1456 §1, 2000)

Definition of Household Group. In addition to a definition of "family", City and County of Broomfield also define a "household group", which has the effect of broadening the allowable configurations of household types that can cohabit, enhancing choice.

17-04-202 Household group.

(A) *Household group* means any one of the following, provided that there is at least 400 square feet of finished interior space for each resident:

(1) A group not exceeding three persons living together as a single housekeeping unit, such group to be distinguished from a group occupying a boarding house, lodging house, club, fraternity, or hotel, except that such a household group may not include more than one individual who is required to register as a sex offender pursuant to Section 18-3-412.5, C.R.S.;

(2) Two or more persons all of who are related by blood, marriage, or legal adoption, together with not more than one adult boarder or domestic servant;

(3) A group of not more than eight developmentally disabled persons living in a state-licensed group home or community-based residential facility for the developmentally disabled;

(4) A group of not more than eight persons in an owner-occupied or nonprofit group home for the exclusive use of persons sixty years of age or older, together with domestic servants; or

(5) A group of not more than eight persons with mental illness living in a state-licensed group home for persons with mental illness, subject, however to such limitations on such homes as are provided by state law.

(B) As used in this section, an *adult* means a person eighteen or older, and child means a person under the age of eighteen.

(C) As used in this section, *finished interior space* includes any room with:

(1) Floor completely covered (except for heating, cooling, or ventilation grilles, cabinets, plumbing fixtures, and appliances), with one or more of the following materials: ceramic or vinyl tile, vinyl sheet goods, cork, rock, brick, carpeting, or finished wood flooring;

(2) Walls completely covered (except for doors, windows, cabinets, electrical outlets, plumbing fixtures, appliances, and heating and ventilation grilles) with one or more of the following materials: painted or wall-papered gypsum board or plaster, stucco, wood or composite paneling, ceramic or vinyl tile, vinyl sheet goods, cork, rock, or brick; and

(3) Ceiling completely covered (except for light fixtures, skylights, and heating, cooling, or ventilation grilles) with one or more of the following materials: painted or wall-papered gypsum board or plaster, stucco, wood or composite paneling, ceramic or vinyl title, vinyl sheet goods, or acoustical panels.

(D) As used in this section *finished interior space* does not include areas with exposed studs, joists, or plain concrete. (Ord. 703 §4, 1986; Ord. 741 §1, 1987; Ord. 1456 §2, 2000)

Minimum Lot Sizes. While "straight zone districts" have minimum lot size, the majority of residential areas are zoned PUD allowing design variations. Minimum lot sizes vary by district.

17-04-090 Dwelling, multiple-family.

Multiple-family dwelling means a building occupied by two or more families living independently of each other in separate dwelling units with a minimum floor area of 500 square feet per unit (including balconies), but not including hotels or motels. (Ord. 149 Art. 26(6), 1973)

17-04-095 Dwelling, one-family.

One-family dwelling means a detached building, arranged and designed as a single dwelling unit, other than a mobile home, and used exclusively by not more than one family or household group, which has not less than one bathroom and a minimum floor area of 850 square feet, unless otherwise specified within the appropriate zone district. (Ord. 703 §2, 1986)

17-04-100 Dwelling unit.

Dwelling unit means one or more rooms, including at least one single kitchen, designed for or occupied as a unit by one family for living and cooking purposes, located in a one-family or multiple-family dwelling. (Ord. 149 Art. 26(9), 1973)

No Dispersal Requirements. There are no dispersal requirements for housing for persons with disabilities, requirements are based on definition of household group.

Growth Management

The Denver Regional Council of Governments (DRCOG) establishes the growth boundary for Broomfield and the City and County of Broomfield adhere to that boundary.

Building Code

Similar to Boulder, Broomfield has adopted the 2012 International Building Code.

Transportation Policies that Promote Access

2005 City and County of Broomfield Comprehensive Plan

The City and County of Broomfield 2005 Comprehensive Plan includes the following policies with the intent to enhance access:

Policies

TS-C.1: Continue working with the Regional Transportation District (RTD) to implement commuter rail and Bus Rapid Transit (BRT) to serve Broomfield's major corridors and employment centers.

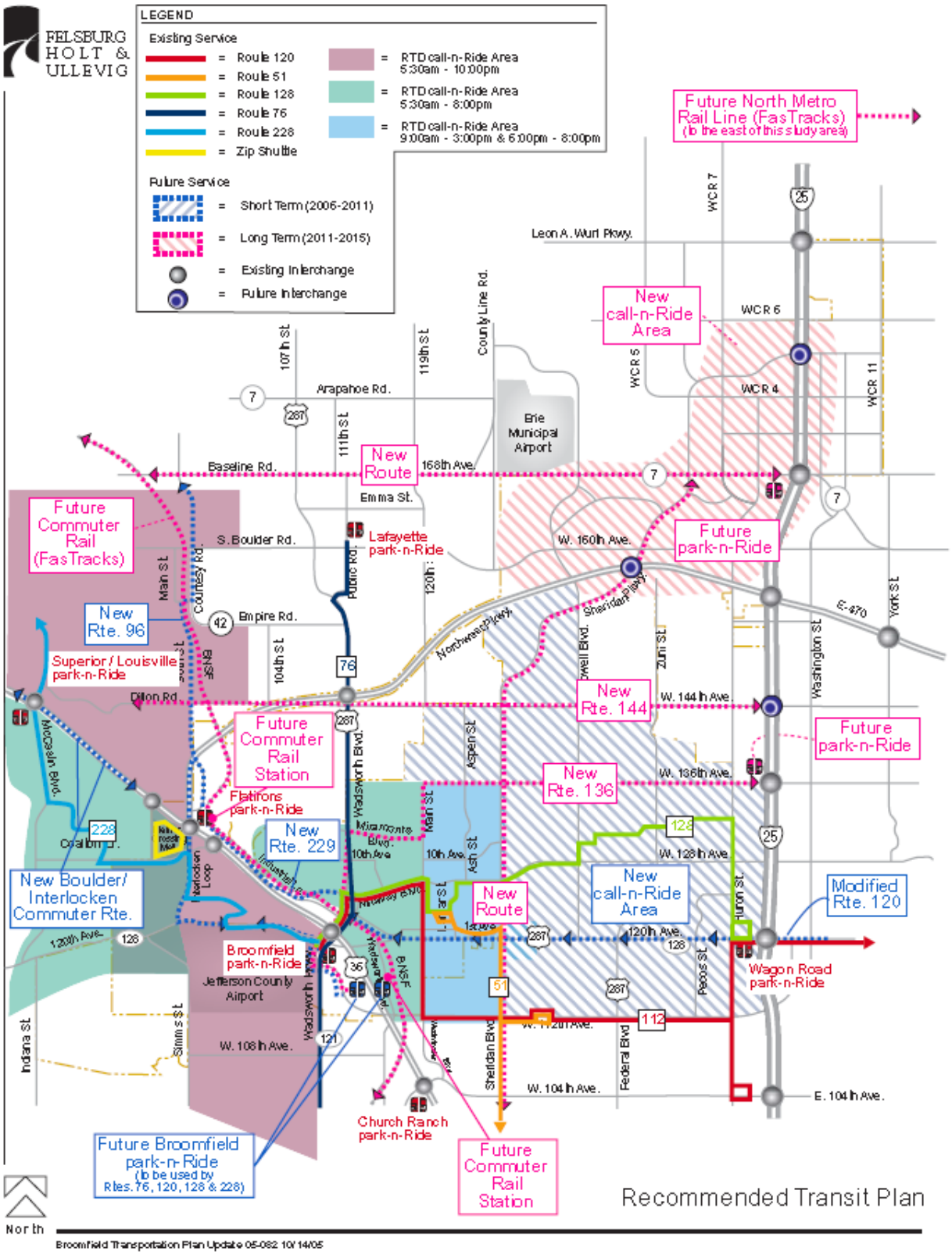
TS-C.2: Advocate for new or modified bus routes to better connect and serve all parts of Broomfield, especially high-density employment and commercial areas. Partner with neighboring jurisdictions to ensure requested bus services receive a high priority.

TS-C.3: Increase services that support the mobility needs of teenagers, senior citizens and special needs populations.

Planned Transit Routes (Map)

The following transit routes were proposed in the 2005 Plan:

See map next page.



Map 12: Recommended Transit Plan

Displacement Prevention Policies and Programs

Similar to City of Boulder, the City and County of Broomfield adhere to the Uniform Relocation Act. Also, during the review and update of Broomfield's Comprehensive Plan, there will be discussions on preserving the limited supply of affordable housing, which is all privately owned and managed.

City of Longmont

Analysis of Regulatory Barriers

A comprehensive review of the City of Longmont's policies and practices did not reveal any impediments to Fair Housing that directly impact any given class. Longmont is a culturally rich community. One of the Comprehensive Plan's goals is to, "Protect civil liberties and ensure that all residents have equal access to resources and opportunities to participate in the community and enjoy life. Longmont will offer programs and services that are culturally sensitive and encourage the participation of diverse residents". Due to the strong economy and the September 2013 flood, which damaged many market-rate and affordable housing units, Longmont has a severe housing shortage, which has pushed sales and rental prices up considerably. This dynamic has unfortunately most impacted the lower-income residents in the community, including the elderly and disabled. Through Community Development Block Grant Disaster Recovery funding for specific programs, the City of Longmont is addressing housing issues which will result in resident housing stabilization.

Longmont Area Comprehensive Plan (LACP)

The Longmont community has a tradition of city planning that dates back to the establishment of the Chicago Colorado Colony in 1871. With the adoption of the St. Vrain Valley Plan in 1974, the City solidified this tradition in response to a period of rapid growth and change. The City last updated the Longmont Area Comprehensive Plan (LCAP) in 2003, has continued to amend the plan to keep it relevant to the community, and has a full update planned to be completed in 2015.

The LACP establishes the type of city residents want Longmont to become by presenting a comprehensive view of the community, defining the vision of the City's future, and establishing general methods by which to realize those visions. Its purpose is to articulate the collective desires of the community. The LACP is second only to the Municipal Charter as the City's most important document.

The City's mission statement succinctly states the focus of the updated LACP: Our mission is to enhance the quality of life for those who live in, work in, or visit our community.

The LACP emphasizes a wide range of goals, strategies and polices intended to achieve the City's vision of a community that is sustainable in the long term and provides a high quality of life for residents. The LACP addresses numerous issues and provides guidance on the following:

- Growth of the City
- Land use and urban design
- Housing

- Economic development
- Commercial development
- Central business district
- Public improvements
- Transportation
- Human services, culture, and education
- Environmental quality and resource conservation
- Parks, greenways, and open space
- Role of government

The LACP has a number of provisions that affirmatively further fair housing. Many goals, policies and strategies included in the Housing chapter, as well as the Growth of the City, Land Use and Urban Design, Human Services, Culture, and Education chapters, among others, work to support fair housing. These include the following goals and strategies.

Growth of the City
The goal of the City is to continue to accommodate growth which enhances the quality of the environment for existing and future residents. Growth should be a positive addition to the City and improve the quality of life for Longmont's residents. The City supports the notion of becoming a sustainable community over the long term.

Goal G-1: Plan, guide and accommodate growth that promotes the most efficient use of scarce resources, and maintains and enhances the quality of life for present and future residents of Longmont.

Goal G-2: Support growth and development that allows Longmont to become a sustainable community over the long-term-- a community that balances economic, environmental, and community concerns as growth occurs.

Strategy G-1.1(d): Coordinate with other service providers during the development review process so that necessary services not provided by the City are available for new development.

Land Use and Urban Design
How Longmont grows is important. Neighborhood planning areas are the basic planning unit in Longmont. These planning areas should include a mix of land uses to serve its residents and workforce.

Goal LUD-3: Recognize the neighborhood planning area as the basic social and service unit of the City, and as the City's basic unit of urban expansion. Plan residential neighborhood planning areas that are self-contained, have a sense of place, and are centered around schools, parks, and other services, all within walking distance of the home.

Goal LUD-4: Mitigate impacts on neighborhoods. Invest in areas that show signs of decline and/or disinvestment in cooperation with other agencies and the private sector.

POLICY LUD-4.2: Encourage revitalization and redevelopment of areas showing signs of decline and/or disinvestment.

Strategy LUD-4.2(b): Invest in areas that show signs of decline and/or disinvestment in cooperation with other agencies and the private sector.

Goal LUD-5: Develop a mix of interdependent, compatible, and mutually supportive land uses to support multiple means of transportation.

Goal LUD-6: Integrate land use and transportation so that activity can be easily incorporated into people's daily lives. Incorporate universal design features, such as, but not limited to, hard surface paths, ramps, frequent benches and lighting that improve accessibility for all users.

Policy LUD-6.1: Encourage walking and biking through well planned, mixed use neighborhoods.

Housing

New housing construction should provide choice at all economic levels in Longmont. Housing demand exists across the board for consumers needing diverse housing opportunities. The LACP provides for housing diversity by allowing different housing types, sizes, and number of units per acre and supports the concept of mixed-use development in neighborhoods.

Goal H-1: Review and revise, as appropriate, City regulations and policies to encourage a balance between housing need and supply. Monitor the Longmont housing market and work with the private sector to promote the construction of housing types in short supply.

POLICY H-1.1: Plan for additional residential growth within the Municipal Service Area to create enough housing to meet the needs of Longmont's residents and people who work in Longmont.

Strategy H-1.1(c): Designate land uses in new neighborhoods to include a broad range of residential development.

Goal H-2: Achieve a wide range of quality housing types to meet the needs of a variety of socioeconomic groups and lifestyles.

POLICY H-2.1: Plan for a variety of housing types within each neighborhood planning area.

Strategy H-2.1(a): Review and revise, as appropriate, the City's development regulations to ensure that they result in the development of quality housing of all types.

Strategy H-2.1(b): Consider increasing densities in residential neighborhoods when the proposed development can demonstrate that it would be compatible with and benefit the existing residential neighborhoods.

Strategy H-2.1(d): Continue to allow a density increase as an incentive for providing additional affordable housing or additional amenities within the development.

POLICY H-2.3: Provide flexibility in the *Land Development Code* to allow different housing options.

Strategy H-2.3(a): Examine the implications of allowing residential auxiliary uses in residential zoning districts to provide housing for family members.

Strategy H-2.3(b): Examine the implications of amending the *Land Development Code* to allow emergency and transitional housing as a discretionary use in residential zoning districts.

Strategy H-2.3(c): Examine opportunities to encourage mixed-use development in residential zoning districts as a means of encouraging a variety of housing types and locations.

Goal H-3: Maintain and enhance the environment of existing residential neighborhoods.

POLICY H-3.3: Upgrade the condition of houses in Longmont.

Strategy H-3.3(a): Develop a housing code enforcement program that follows the International Property Maintenance Code, as amended, and provide information to homeowners and investor-owners in need of housing assistance to make necessary repairs to their properties.

Strategy H-3.3(c): Use infrastructure improvements such as sidewalks, curb and gutters, and parks to help maintain and preserve neighborhoods.

Strategy H-3.3(d): Provide assistance to low- and moderate- income homeowners to help maintain their homes as safe and healthy environments.

Goal H-6: Support opportunities to provide affordable housing.

POLICY H-6.1: Pursue, in cooperation with other agencies, more housing opportunities dispersed throughout the City for low- and moderate-income people.

Strategy H-6.1(a): Provide incentives to developers to construct affordable housing.

Strategy H-6.1(b): Provide assistance to people seeking affordable housing options.

Human Services, Culture, and Education

This chapter recognizes the important role that social, cultural, and educational factors have on the physical development of the City and the quality of life in the community. Longmont's diverse residents contribute to what makes this community special. People want Longmont to be a community where everyone receives respect and dignity and has opportunities to actively participate in community life. Developing an awareness and appreciation of differences, and then celebrating what each person brings to Longmont, can enrich everyone.

The City uses five basic premises in guiding its efforts in providing human services to Longmont's residents. These are: Empowerment, Prevention, Early Intervention and Education, Community Catalyst and Continuum Catalyst, and Service Accessibility and Acceptability. Service accessibility and acceptability focus on providing services and programs that are accessible to residents, that reflect cultural sensitivity, and that understand and appreciate the diversity of people, ideas, and values.

Goal HS-1: Support and enhance a wide range of social, cultural, informational, and educational resources so that all Longmont residents have an equal opportunity to maximize their potential and enhance their quality of life.

POLICY HS-1.1: Promote human service programs that strengthen and support individuals, families, and neighborhoods.

Strategy HS-1.1(d): Focus resources on a continuum of services and programs to assist residents with varying levels of need ranging from basic needs (food, shelter, clothing, and protection from abuse and neglect) to early intervention and prevention that address human conditions or issues before they develop into significant individual, family and/or community issues.

Policy HS-1.2: Improve cultural opportunities, and foster an appreciation of diversity.

Strategy HS-1.2(c): Support cultural opportunities such as providing appropriate facilities, collections, resources, educational programs, and family activities at the museum, the senior and recreation centers, and the library.

Goal HS-2: Protect civil liberties and ensure that all residents have equal access to resources and opportunities to participate in the community and enjoy life.

Strategy HS-2.1(b): Offer programs and services that are culturally sensitive and encourage the participation of diverse residents.

Strategy HS-2.1(c): Periodically review the community mediation program that includes racial and other tolerance issues, and modify as appropriate.

Role of Government
Goal RG-2: Work cooperatively to achieve the goals and polices of the LACP through the efficient, equitable, and fair operation of municipal government and the private sector.
Strategy RG-2.5(b): Develop and administer programs that actively involve neighborhood groups, business organizations, civic organizations, and residents in the City decision-making process.

Strategy RG-2.6(a): Explore opportunities to serve City residents better by creating partnerships, and structure the partnerships as formal or informal, continuous or time-specific, comprehensive or project-specific as appropriate.

Many of the goals stated above and their associated policies and strategies support fair housing. Because the plan is comprehensive and provides focus on improving quality of life for all who live in, work in or visit the community, the plan does not discriminate. There are sections of the plan that could be interpreted to unintentionally restrict housing choice or reduce affordability; however, the plan is a tool for policy makers and would typically be used in a way that balances choice and affordability with other goals. Some of the goals relating to funding growth (i.e. development must pay its own way) could be interpreted as increasing the cost of development including housing. Also, goals related to developing only within the Municipal Service Area and Longmont Planning Area restrict the location of new development, which could be interpreted as limiting land availability leading to higher costs.

Land Development Code
Longmont's Code of Ordinances, Title 15- Land Development Code, otherwise known as the Longmont Land Development Code, advances housing policy with land use regulations. The regulations of this development code are intended to implement the LACP and the community quality of life benchmarks, as amended, and more specifically are intended in part to:

- Promote the public health, safety, convenience, comfort, prosperity, and general welfare.
- Minimize congestion in travel and transportation, reduce community dependence on automobile travel, encourage trip consolidation, and facilitate development of alternative modes of transportation consistent with the multi-modal transportation plan.
- Encourage innovative and quality residential development so that growing demand for housing may be met by greater variety in type, design, and layout of dwellings, and by conservation and more efficient use of open space ancillary to such dwellings.

- Encourage pedestrian and vehicular connections between residential neighborhoods and surrounding employment and shopping centers and community facilities such as parks and schools.

Growth Management

The City has several growth management strategies in place. These are identified in the comprehensive plan and implemented through a number of mechanisms including intergovernmental agreements with Boulder County, Weld County and the Denver Regional Council of Governments (DRCOG). The City has several IGAs with Boulder County; the "Super IGA" (the COMPREHENSIVE DEVELOPMENT PLAN INTERGOVERNMENTAL AGREEMENT) basically identifies growth areas for municipalities within the County, including Longmont. The City's IGA with Weld County identifies a coordinated planning area between the City and County, which shows the City's level of commitment to providing public infrastructure for growth and development. The City has also identified an urban growth area (UGA), as defined in the DRCOG Metro Vision 2035 Plan. As part of this plan, the City has agreed to a specific 2035 urban area; this area is tracked and monitored annually.

The City has an open space program that aims to provide a high quality open space and trails systems for Longmont. Goals of the program include: preserving natural areas and habitat, linking trails, conserving natural resources and providing urban shaping buffers. The City works closely with Boulder County who also purchases and preserves open space around Longmont's planning area.

Although the City plans for and directs growth and development to strategic locations, the growth management and open space preservation strategies are not intended to limit options for housing within the City.

Codes

The City has currently adopted the 2012 International family of codes (i.e. 2012 IBC), which regulate the minimum standards to which all buildings are constructed in Longmont. These codes are published every three years and are reviewed by staff and those parties affected by the adopted codes. Any amended sections are taken to the Master Board of Appeals and City Council for approval prior to adoption.

The City of Longmont has adopted the 2012 International Building Code and has also adopted the 2012 International Property Maintenance Code.

Local zoning laws and policies

The Longmont Land Development Code provides development regulations. These regulations provide guidance on zoning, including permitted and prohibited uses. These regulations also provide density and dimensional standards within each zoning district. Low density residential (R1) is described as primarily low-density detached one-family dwellings and is between 1 – 5 dwelling units per acre. The minimum lot size for a single-family (R-1) lot is 5,500 square feet. The minimum lot size for a single-family lot designated as affordable housing is 4,500 square feet. Medium density residential (R-2) is between 6-12 DU/acre and high density residential (R-3) is between 12-30 DU/acre. Density bonuses are allowed for new development sites that include affordable housing.

Height limits vary by zoning district; they range from 20 feet in Mobile Home zones to 30-feet in low and medium density residential zones, 40 feet in high density residential zones, and up to 50 feet in commercial zones.

The City of Longmont has a MH (Mobile Home Development) zoning designation.
The City of Longmont does not have specific dispersal requirements for housing facilities for persons with disabilities in single-family zones. Instead these facilities are allowed in multiple zones. The City does not have restrictions on the number of persons in a dwelling unit based on unit size or number of bedrooms, but the Municipal Code stipulates that no more than five unrelated persons many live in a single dwelling unit.

Summary of Land Use Categories

The following table is a quick reference guide which summarizes the land use categories identified on the Comprehensive Plan map.

Land Use Category	Range of Density	Uses	Locational Criteria
Ultra Low Density Residential	Up to 1 unit per 5 acres. Generally, densities will be lower unless developed as part of a transferred development rights program, in a clustered development pattern.	Ultra low density single-family detached housing.	▪ Areas designated for open space, such as urban shaping buffers. ▪ Areas with severe physiographic constraints. ▪ Clustered to the extent possible. ▪ Areas with limited utility capacity. ▪ Basic urban services (City wastewater required and City water highly desirable). ▪ Areas that may be part of a transferred development rights program.
Very Low Density Residential	Up to 1 unit per acre.	Very low density single-family detached housing.	▪ Areas with physiographic constraints that make higher-density impractical. ▪ Areas away from activity centers. ▪ Areas with limited utility capacity ▪ Full range of urban services required. ▪ Clustered to the extent possible.
Low Density Residential	1-6 units per acre.	Low density housing in neighborhoods. May include a mix of housing types and densities and limited neighborhood services as part of a planned residential development.	▪ Areas that will not be adversely impacted by surrounding land uses. ▪ Areas with no physiographic or environmental constraints. ▪ Areas suitable as quiet residential neighborhoods. ▪ Areas within walking distance of neighborhood or multi-neighborhood shopping, educational, and/or recreational facilities but not requiring proximity to major activity centers.

Medium Density Residential	Greater than 6 units per acre and up to 12 units per acre.	A variety of residential housing types and densities, including duplexes, tri-plexes, four-plexes, and multi-family housing. May include neighborhood services as part of a planned residential development.	▪ Areas serving as transitional land use between low and high density residential uses. ▪ Areas within one-half mile range of shopping, educational, and recreational facilities. ▪ Areas adjacent to arterial or collector streets or accessible to such without passing through less intensive land uses. ▪ Areas where medium density residential is compatible with adjacent land uses. ▪ Areas served by public transportation. ▪ Areas where blight exists and medium density residential is the most appropriate method for revitalizing the area.
High Density Residential	Greater than 12 units per acre and up to 30 units per acre.	Multi-family residential housing and group living facilities. May include a mix of housing types and densities and neighborhood services as part of a planned residential development.	▪ Areas adjacent to or within walking distance of schools, parks, and neighborhood and/or multi-neighborhood shopping. ▪ Areas in proximity to employment centers. ▪ Areas adjacent to arterial streets or accessible to such without passing through less intensive land uses.

Commissions and Boards

The City of Longmont has a total of 22 citizen based boards, committees and commissions on which approximately 160 citizens serve. Generally, the terms board, committee, commission, and authority are synonymous, however, there are a few differences in the functions and powers of some boards. The provisions for the City's boards and commissions are set forth in Article VII of the City Charter.

Recruitment Practices: The City Council seeks applications from citizens interested in serving on boards, committees or commissions through a bi-annual recruiting process, generally held in April and September. Notices are posted on the city's website and in the Daily Times-Call. The City of Longmont considers applicants for all positions without regard to race, color, creed, religion, sex, national origin, ancestry, sexual orientation, age, veteran status, disability or any other legally protected status.

Qualifications: Applicants must be registered voters within the city limits of Longmont for one year prior to being appointed. Only a few boards have special qualifications for serving. All positions are on a volunteer basis and are non-paying.

The application process includes an application, and an interview with City Council, who votes on the appointments to fill the vacancies.

Advisory Boards

The majority of City boards operates in an advisory capacity to the City Council and is made up of between five and eleven members with at least one staff liaison and a secretary. Each board reviews, discusses and makes recommendations to City Council on a variety of issues associated with its function. Recommendations from advisory boards are forwarded to the City Council which has the final decision-making responsibility. The City Council carefully weighs board recommendations with citizen, business owner, staff, and comments from other interested parties to arrive at a decision which Council believes is in the overall best interest of the Longmont community.

Quasi-Judicial Boards

In addition to the advisory boards, the City of Longmont has two quasi-judicial boards--the Board of Adjustment and Appeals and the Master Board of Appeals-- which deal with requests for exceptions to various building codes. These boards are given specific powers through State statutes and deal with specific items which, at one time, Council heard and made decisions on at its regular meetings.

Authority to act is given to specific boards by ordinances, delegating Council's decision-making power to them. Unlike the advisory board recommendations, the decisions made by the quasi-judicial boards are final and can only be appealed to, and overturned by, a court.

Task Forces

Task forces are committees that Council sets up from time to time to focus on a specific item or task. A task force is given direction from Council and serves only until the task for which it was created is accomplished. In the past, Council has created task forces for such items as establishing priorities for Parks and Recreation needs, reviewing potential uses for the Carnegie building, and making recommendations on a solid waste collection program. The size of these committees can vary from a few individuals to many depending on the issue and the scope of the assigned task.

With few exceptions, the meetings of City Council and any of its appointed boards are open to the public. Citizen participation is encouraged and welcomed at these meetings. Council and staff believe that the more involved citizens are in the early stages of program and legislation development, the better local government can meet the needs and expectations of this community.

The Planning and Zoning Commission:

The Planning and Zoning Commission consists of seven (7) regular commission members appointed to serve five year terms, and three (3) alternate commission members appointed to serve two (2) year terms.

The purpose of the Planning and Zoning Commission is to review and advise the City Council on all public and private activities involving the physical, social, and economic development of the City and to prepare and recommend a master plan for the physical development of the

City. The Commission also reviews and advises the City Council on matters concerning long range planning for territory within the City boundaries.

The primary functions and duties of the Planning and Zoning Commission include:

- Prepare and recommend to the council a comprehensive plan with attendant goals and policies for the orderly physical, social, and economic development of the City including areas outside the City boundaries which bear relation to the City's long range planning;

- Review and make recommendations to the City Council on all amendments to the comprehensive plan;
- Consider changes in the zoning ordinance and make recommendations thereon to the city council;
- Exercise the functions and powers and perform the duties assigned to it by resolutions and/or ordinances of the City.

Housing and Human Services Advisory Board (HHSAB)
Purpose: Advise and assist Council on understanding housing and human service needs of the Longmont Community.

Ongoing Tasks of HHSAB Board:

- Assess the effectiveness of current housing programs managed by the City including the allocation of resources, targeting, and long-range affordable housing sustainability.
- Research and recommend new and innovative approaches to address priority housing concerns.
- Recommend a housing policy for the City that will guide housing development in general by specifying targets for all income levels, for families, seniors, and other population segments.
- Support a regional approach for addressing the jobs/housing balance, specifically with Boulder, Weld, and Broomfield Counties.
- Involve neighborhoods in the discussion of neighborhood redevelopment or revitalization.
- Assist staff in the development of affordable housing strategies and initiatives.
- Review and recommend to City council funding for projects using CDBG, HOME and local Affordable Housing Funds

Membership
The Advisory Board shall represent all ages of adults from the various social, economic, ethnicity and racial segments of the community.

Technical Review Group for Affordable Housing Projects
Purpose: Review affordable housing project applications for technical merit and provide information to Longmont Housing and Human Services Advisory Board (HHSAB) for their final review and recommendation to Council.

The duties of the Technical Review Group include:

- Recommend to HHSAB affordable housing goals for the Affordable Housing Fund (AHF), the CDBG and HOME programs, and policies or criteria to be used to meet these goals
- Analyze applications for:
    - Experience and capacity of developer (i.e. number of years of experience, other projects completed, work plan for project, and schedule for completion, etc.)
    - Cost (i.e. comparison of cost per square foot and per affordable unit, evaluation of developer's fee, loan to value ratios, etc.)
    - Financial feasibility (i.e. leveraging, status of other funding commitment, operating reserves, contingency funds for emergencies, etc.)
    - Conformance to affordability requirement (i.e. follow priorities by income, by type of unit, location within community, special needs groups)

Membership

The up to 8 member Technical Review Group (TRG) will include a HHSAB member (chosen annually) as well as representation from the following groups:

- Housing Builder
- Housing Developer
- Real Estate Community
- Banking/Lending Community
- Special needs population (physically handicapped, mentally ill, homeless, seniors)
- Low income persons or groups that serve the low income population

Members shall serve staggered terms so that approximately 1/3 are up for renewal in any one year.

Longmont Workforce Housing Task Force

On November 29, 2011 the Longmont City Council formed the Ad Hoc Workforce Housing Task Force (Task Force) "to determine the need for affordable housing in Longmont to house our workforce and to make recommendations to Council on how to address that need". Twenty-two community members were appointed. The membership included:

- Low-income Affordable Homeowners
- Human Services Providers
- Builders/Developers- for profit and non-profit
- Lenders
- Real Estate Community
- Workforce Boulder County
- City Boards and Commissions: Affordable Housing Technical Review Group
  Senior Advisory Board
  Housing and Human Services Advisory Board
  Planning and Zoning Commission

The City provided two trained, neutral facilitators to help the group meet their goals. Additional City staff was available specifically for resource provision and support of the work of the Task Force.

Through the City, the Task Force contracted with a consultant to conduct a market needs analysis. The primary results of the analysis include:

- A very tight rental market with a historically low vacancy rate of 0.95% for market and 0.17% for affordable units. There are gaps in the supply of rental housing at all income levels. The biggest gaps are for the very lowest income households, and in the market rent ranges.
- Rents have risen for all unit types of rental units and continue an upward trend
- Households up to 51% of the AMI have trouble paying the average rent in Longmont

The Task Force integrated the information from the Market Needs Analysis with input from the public via three community involvement processes, as well as information provided from local housing providers, city planning and housing staff, and the community knowledge of the various Task Force members. The Task Force members discussed debated, researched and finally determined formal recommendations for Council to consider in order to impact the need for affordable housing for Longmont's workforce.

On May 21, 2013 the Task Force presented a Report to City Council with the following strategic recommendations:

- Fund the City's Affordable Housing Programs in a new way. Two of these strategies involved taxation, which could impact lower income households, the disabled and seniors.
- Rental Strategies included preserving and adding quality affordable housing for lower income wage earners below 50% AMI
- Continue to provide affordable homeownership programs through down payment assistance, homeowner education, rehabilitation, and programs which support non-profit housing providers
- Consider changes in the economy, community, market, and environment to ensure long-term sustainability and flexibility for the housing program. Build specific benchmarks and community goals into the program.

City Council accepted the recommendations but felt the goals were too broad to grow the affordable housing inventory to meet the need in a timely way. Council recommended another Task Force be formed to consider "best practices" that other communities have used to increase their affordable housing inventory, including a consideration of the City's Inclusionary Housing program which was repealed in 2011.

History and Timeline of the Inclusionary Zoning Ordinance:
Longmont's Community Housing (Inclusionary Zoning) Program was first approved in 1995 as a result of the community's desire to provide homes for all income levels while dispersing affordable housing throughout the community. Over the years, the program was amended

several times to address market issues, such as providing alternative ways for developers to meet their housing requirements through partnerships with non-profit organizations and by providing rental options for ownership units if the homes couldn't be sold within a specific timeframe.

The Inclusionary Zoning Program applied to all new residential developments and required that 10% of all newly constructed housing be affordable at 80% AMI or less for homeownership units and 50% AMI or less for rental housing units. There were options for the developers to provide the affordable housing in the development, pay cash-in-lieu, provide units off site and/or partner with non-profit housing providers to provide affordable homes in the community. The period of affordability was a minimum of 10 years for homeowner units and 20 years for rental housing.

Developers received incentives to offset costs, including development fee waivers, density bonuses, a fast-track permitting process and relaxed requirements for setbacks and landscaping.

As a result 160 households were able to purchase affordable homes. Most households were already living and/or working in Longmont and were employed in the retail and service sectors, computer and technology, education, childcare, medical and dental fields, or government.

Through 21 developments, scattered throughout the city, 144 homeowner units were built and 469 rental homes were constructed. $4,438,098 was received as cash-in-lieu payments and built an additional 703 rental units and 74 homeowner units, which averaged 48.5 new units per year. Funds were leveraged at a $4.65 to $1 ratio and revolved as loans over 1.5 times.

City Council voted to repeal the Inclusionary Zoning Program Ordinance on April 26, 2011. The primary reasons were the downturn in the housing market conditions and lending climate during the Great Recession, and a belief that the program overly burdened one sector of the community, the homebuilders. The repeal removed the building requirement and allowed all affordable homeowners in the program to be released from their period of affordability. To date over 70% of the homeowners have opted out of the program, the rest can opt out at any time, although most are waiting until they refinance or sell their homes.

Affordable Housing Fund:
The Affordable Housing Fund was funded through the Inclusionary Housing program and City funding. Since the program's repeal, the only Affordable Housing Funding available is brought in through loan payments; approximately $180,000 per year. The remaining principal balance in the trust fund is approximately $1.2 million.

Demolition and displacement decisions pertaining to assisted housing and the removal of slums and blight:

The City of Longmont complies with the federal URA requirements for federally funded projects and works to minimize displacement.

Transportation Policies that Promote Access

Longmont Area Comprehensive Plan

Transportation
Mobility is important to the City's economic, environmental and community health, which includes mobility-impaired accessibility.

Goal T-2: Provide an adequate, safe and efficient multi-modal transportation system that is compatible with the natural, community and economic environment and supports community health.

Strategy T-2.4(a): Design and promote the bikeway system as an important facility that serves different users, including bicyclists, pedestrians, and joggers, with different functions such as transportation and recreation.

Strategy T-2.4(b): Provide convenient and direct connections using bikeways and walkways between residential, employment centers and schools, with grade separations at major barriers such as arterials, rivers, and railroads.

POLICY T-2.7: Improve access to transportation for people with special transportation needs such as people with disabilities, people with low incomes, the elderly, and the young.

Longmont Multi-Modal Transportation Plan

In 2005, Longmont adopted its *Multi-Modal Transportation Plan*. This plan was developed as a means to ensure that all modes of transportation were considered in a coordinated manner. This plan will be updated in 2015 in conjunction with the Longmont Area Comprehensive Plan update.

The following are accessibility goals and implementation actions from this plan:

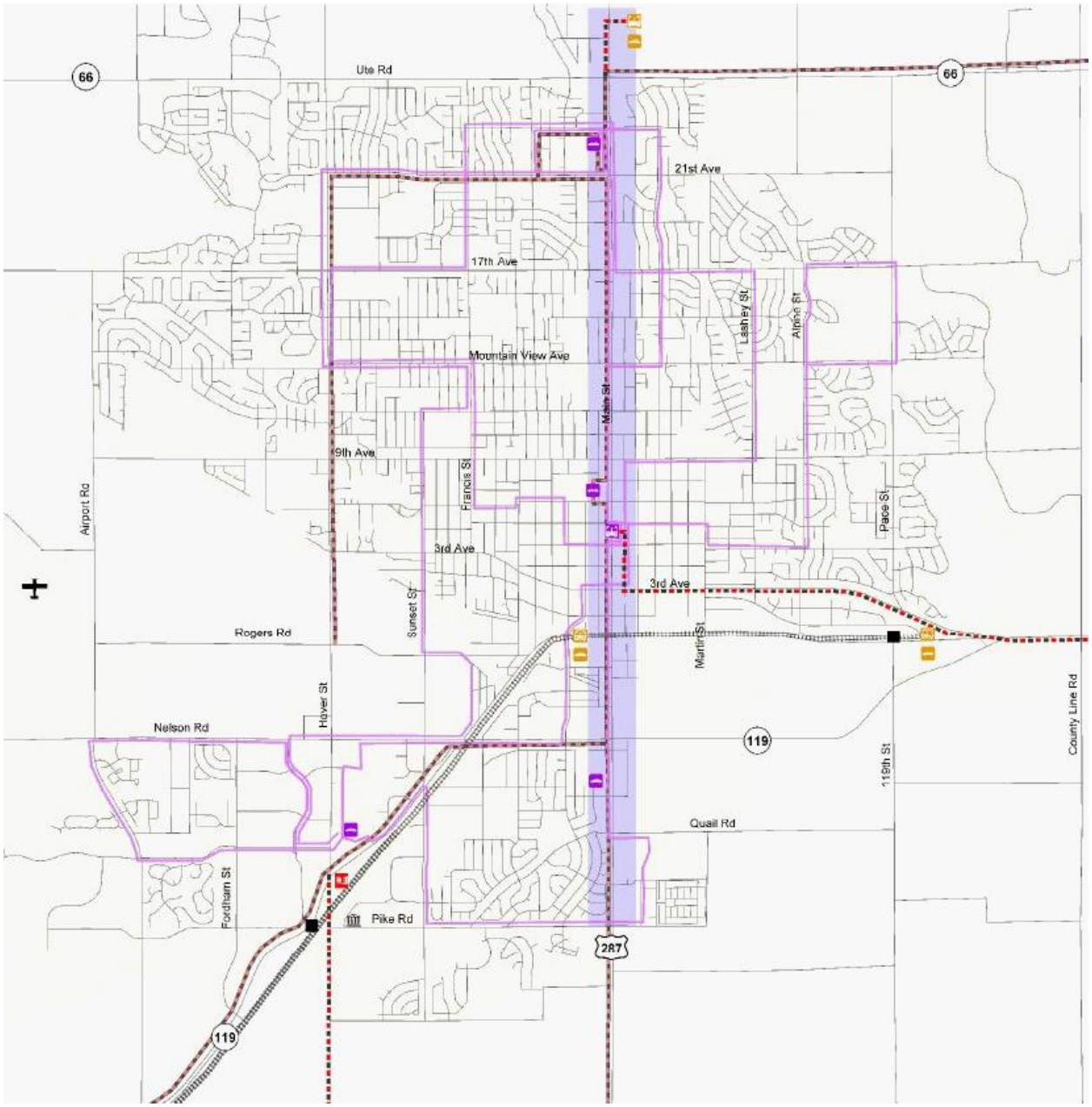
Access Goal: *Develop a transportation system that is convenient and accessible for all.* All Longmont residents should have safe and convenient access to jobs, services, shopping, housing, schools, and recreation activities. Areas outside of Longmont should also be accessible, including Boulder, cities in

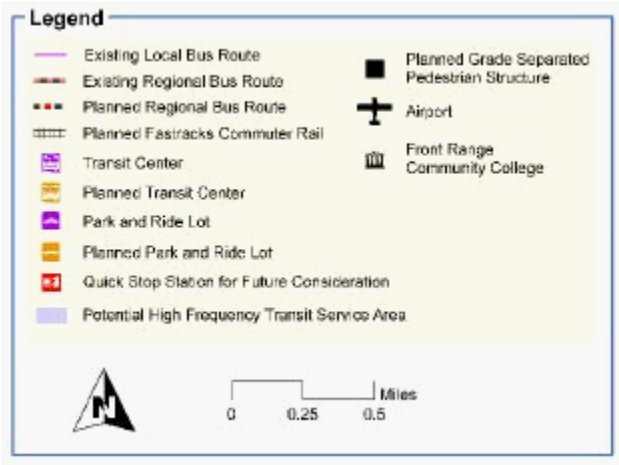
the Denver metro area, the North Front Range, and Denver International Airport. The transportation system should be convenient and easy to use for all, including people with special needs, such as the disabled, aging, and youth populations.

Policy: Participate in regional transit planning activities that will enhance support for regional transit connections in Longmont.

Strategy T-2.7(d): Evaluate the transportation system and identify modifications that would make it easier for an aging population to use.

Map. Planned Location of Transit Service, Longmont Multi-Modal Transportation Plan, 2005





Note: Map scale shown on legend is off.

Displacement Prevention Policies and Programs

Adherence to the URA

Due to its use of federal funds (CDBG, HOME), the City strictly adheres to the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA). The URA provides uniform, fair and equitable treatment of persons whose real property is acquired or who are displaced in connection with federally funded projects; ensures relocation assistance is provided to displaced persons to lessen the emotional and financial impact of displacement; and ensures that no individual or family is displaced unless decent, safe, and sanitary housing is available within the displaced person's financial means.

Through annual monitoring procedures eligible residency is confirmed for homeowner and rental housing units.

Fair Housing Enforcement and Education

Fair Housing: Housing Authority and Other Affordable Housing

The City of Longmont enforces Fair Housing laws by conducting training, outreach and compliance monitoring. All federally funded housing projects are monitored on a regular basis to ensure compliance and to verify that staff is properly trained on Fair Housing laws. Monitoring includes a review of the grantee's non-discrimination policy, tenant selection plan, affirmative marketing plan, MBE/WBE procurement and outreach, use of FHEO language and logos on handbooks, manuals and program literature, collection of beneficiary data.

The Community and Neighborhood Resources office in the City Longmont serves as Longmont's fair housing office. Services include fair housing information and landlord/tenant relations information dissemination through trainings, workshops, and individual meetings. Fair housing complaints are

received through the Community and Neighborhood Resources office. Mediation is offered to landlord to tenant, and neighbor to neighbor, regarding fair housing and affordable housing issues.

Fair Housing: Homeownership Program

Boulder County's Down Payment Assistance Homeownership Program, administered by the City of Longmont, is in compliance with the federal Fair Housing Act. The City actively promotes fair housing opportunity and publishes information and materials such as the Boulder County Homeownership Programs Common Application, and homeowner and buyer program guides, which include the Fair Housing logos and specifically state the intention of non-discrimination of protected classes. Staff members have received fair housing training, including training from HUD, and have years of experience developing and implementing affordable housing programs and promoting fair housing opportunity.

Boulder County

A comprehensive review of Boulder County's policies and practices did not reveal any impediments to Fair Housing that directly impact any given protected class. Boulder County is quite progressive in promoting Fair Housing and expanding housing opportunities as well as bridging the housing-jobs linkage through progressive transportation policies.

Board Recruitment Practices

Boulder County does not have any policies that negatively affect the representation of any protected classes on commissions or boards. Specifics on selection criteria for Boards and Commissions that may affect fair housing are described in detail below.

Description of Boards and Commissions

Boulder County Board of County Commissioners

Selection and Term

1. Each of the three members of the Board is elected by the registered voters of Boulder County in a general election. Although nominated from different districts, the Commissioners are selected through a county-wide vote.

2. The term of each Commissioner is four years.

Duties and Responsibilities

1. Under state statute, the Board has the authority to adopt and amend zoning and Subdivision Regulations, specifically including, but not limited to, regulations regarding planned unit developments and areas and activities of statewide interest; enact ordinances compelling the removal of weeds and rubbish; adopt a building code; review service plans for proposed special districts; make decisions regarding ownership and maintenance of roads, as well as access to County roads based on the Transportation Standards; and enter into intergovernmental agreements to plan for and control land uses and development.

2. The Board holds regularly scheduled meetings to take official action on these issues and any other matter which requires official Board action. Two members of the Board shall constitute a quorum necessary for official action.

Boulder County Planning Commission

Selection, Membership, and Term

1. The Board of County Commissioners appoints nine Planning Commission members.

2. All members must be residents of the County.

3. The term of members is three years.

Duties and Responsibilities

1. The Planning Commission holds regularly scheduled meetings to take official action on rezoning requests, requests for approvals under the Subdivision Regulations, and special use applications, and to address any other related matters which require official Planning Commission action. The Planning Commission is responsible for the adoption of the Boulder County Comprehensive Plan and any amendments to that Plan.

2. Five members of the Planning Commission shall constitute a quorum necessary for official action.

3. The procedures followed by the Planning Commission are contained in Article 28 of Title 30, C.R.S., as amended, and in the official bylaws adopted by the Planning Commission.

Boulder County Long Range Planning Commission

Selection, Membership, and Term

1. The Long Range Planning Commission has 11 members; nine members appointed by the Board of County Commissioners and two members of the Planning Commission, selected by the membership of that body.

2. All members must be residents of the County.

3. The term of the nine Board appointed members is two years, while the term for the Planning Commission appointed members is one year.

Duties and Responsibilities

1. The Long Range Planning Commission is authorized to hold regularly scheduled meetings to discuss long range comprehensive planning matters brought to their attention by either the County Commissioners, Planning Commission, County staff, the public, or the membership of the Long Range Planning Commission.

2. The procedures followed by the Long Range Planning Commission are contained in the official bylaws adopted by the Long Range Planning Commission.

Boulder County Board of Adjustment

Membership, Selection, and Term

1. The Board of County Commissioners appoints five regular Board of Adjustment members. Members of the Planning Commission may take the place of a regular Board of Adjustment member in the event of a temporary absence or vacancy; however, not more than two

members of the Board of Adjustment may concurrently be members of the Planning Commission.

2. All members must be residents of the County.

3. The term of regular members is three years.

Duties and Responsibilities

1. The Board of Adjustment holds regular meetings to hear appeals of any order, requirement, decision, or determination made by the Land Use Director or County Engineer in administering or enforcing Article 4 and related provisions (i.e., definitions in Article 18) of this Code, and to consider certain variances from the requirements of Article 4 of this Code.

2. The Board of Adjustment does not have the authority to grant any variance:

a. from uses permitted in the zoning district;

b. from the minimum lot size required or maximum gross density allowed in any zoning district;

c. from any definition;

d. from the height or yard requirements which may be obtained, or have been denied, through the approval of a special use;

e. which authorizes a substantial modification of a planned unit development or special use approved by the Board of County Commissioners; or

f. which will cause an increase in the base flood to occur.

3. In order for the Board of Adjustment to grant a variance, or to decide an appeal which overturns an official decision made in enforcing this Code, at least four members of the Board of Adjustment must vote in favor of the applicant or appellant.

Comprehensive Plan

In addition to the Boulder Valley Comprehensive Plan (BVCP), Boulder County has adopted the Boulder County Comprehensive Plan (BCCP).

The BCCP was developed to respond to the widely accepted principle that the myriad of future land use decisions affecting the county's lands should be made in a coordinated and responsible manner. The BCCP's philosophy is that:

- Growth should be channeled to municipalities

- Agricultural lands should be protected
- Preservation of our environmental and natural resources should be a high priority in making land use decisions.

The BCCP has several goals that affirmatively further fair housing, including:

A.4 - Within Community Service Areas a suitable balance between employment opportunities and available housing, in light of the labor force and other demographic characteristics of the community, should be established and maintained.

D.1 – A diversity of housing types and densities should be encouraged in order to assure decent housing for all persons.

E.5 – Adequate facilities and services which provide diverse educational, cultural, and social opportunities should be encouraged.

E.6 – Adequate facilities and services to assure the health, safety and welfare of all citizens should be promoted.

G.5 – Ensure Equitable Access to the Transportation System. Ensure that adequate transportation exists for all users regardless of age, income, or ability.

HO 1.06 – Legislation and policies that enhance equal housing opportunities shall be encouraged and supported, including but not limited to:

HO 1.06.02 – The elimination of discrimination against any person because of sex, race, color, religion, marital status, or national origin with regard to the sale, financing or rental of housing.

HO 1.06.02 – The elimination of exclusionary or discriminatory practices in zoning, development, and construction.

HO 1.06.03 – The development of programs to provide tax relief to low income families and low income senior citizens.

HO 1.06.04 – The provision of adequate public transportation for low and moderate income families and senior citizens.

The BCCP has several elements that have the potential to limit housing choice. The intent of the plan is to encourage all growth to occur within the incorporated municipalities within Boulder County. This goal is intended to preserve the natural environment, agricultural land and encourage economic development within municipalities; however this also limits the availability of land for housing.

Growth Management

Boulder County has a strong growth management strategy which is designed to funnel growth into, or adjacent to the existing urban areas and municipalities. This strategy has been implemented through an aggressive open space preservation program, Intergovernmental Agreements, and the policies of the Boulder County Comprehensive Plan and Boulder County Land Use Code. As with the City of Boulder, Boulder County's growth management enhances many aspects of life in the County, but also significantly limits land available for development.

Open Space Preservation: In 1992 Boulder County voters approved a sales tax for the purpose of acquiring and preserving open space throughout Boulder County. Today, over 320,000 acres within Boulder County is preserved by federal, state or local agencies as dedicated open space.

Intergovernmental Agreements (IGAs): Boulder County has entered into IGAs with the municipalities located within the county to help guide areas intended for open space preservation and areas intended for development. It is through these IGAs that the County government and local municipalities set goals for open space preservation as well as areas that are suitable for development.

Boulder County Comprehensive Plan & Boulder County Land Use Code: These two documents reinforce Boulder County's growth management goals by guiding development within or adjacent to the incorporated municipalities.

Land Use Code

The Boulder County Land Use Code was enacted to protect and promote the health, safety, and general welfare of the present and future inhabitants of Boulder County and to guide future growth, development, and distribution of land uses within Boulder County.

The following are elements of the Boulder County Land Use Code that have the potential to promote of limit housing choice:

Zoning Code: Article 4 of the Boulder County Land Use Code regulates zoning in unincorporated areas of Boulder County. The following provision of the zoning code have the potential to affect housing choice:

- **Minimum Lot Sizes**: The minimum lot size permitted in any zone district for residential uses excluding single family homes is 7,500 sq. ft. Single family dwellings are permitted by right in all zone districts and may be located on lots under 7,500 sq. ft.
- **Density:** The maximum density allowed in the Boulder County Land Use Code is 9 dwelling units per acre, in the multifamily zone district.
- **Manufactured Home Zone:** The Manufactured Home Park District is provided within the zoning code to provide for manufactured home parks in appropriate locations,

consistent with comprehensive planning policies to encourage and provide for affordable housing including the preservation of existing housing stocks.

- **Group Care or Foster Home:** Group Care and Foster Homes are defined in the Land Use Code as a facility which provides 24-hour care or supervision of persons who are not related by blood, marriage, or adoption, to the owner, operator, or manager thereof, and who do not meet the definition of family under this Code. Group Care or Foster Home facilities are permitted by Special Review in 10 zone districts.
- **Accessory Dwelling Units (ADUs):** ADUs are permitted in all zone districts, subject to a Limited Impact Special Review. This review is conducted by the Board of County Commissioners who will approve or deny the use based on the compatibility of the use with the site and surrounding land and uses and the adequacy of required services.
- **Definition of Family:** Family is defined by the Boulder County Land Use Code as:
    - **A.** An individual, or two or more individuals related by blood, marriage, or adoption, and not more than two roomers or boarders; or
    - **B.** Two adults and any of their lineal descendants; or
    - **C.** A group of not more than three unrelated individuals; and who are living together as a single housekeeping unit.

Local Building, Occupancy, and Health and Safety Codes

Occupancy Limits

The Boulder County Land Use Code does not restrict occupancy with the exception of short term dwellings (defined as a dwelling that is rented in durations of less than 30 days). In these situations dwelling rented 46 nights per year or more may have a maximum occupancy of two adults per bedroom with a maximum of eight people or a lower number of people based on the size of the permitted and approved on-site wastewater system, unless the Land Use Director approves a greater capacity, which can be demonstrated based on parking, parcel size, the on-site wastewater system, or other relevant circumstance.

Building Code

Boulder County has adopted the International Building Code (IBC) 2012. The IBC is recognized by the Department of Justice as a “safe harbor” for accessibility since compliance with the IBC has been demonstrated to fulfill the requirements of the Fair Housing Act.

Transportation Programs and Policies that Promote Access

Mobility for All Program

Boulder County employs a transportation planner who oversees the Mobility for All Program, provides transit support and other types of transportation assistance to help low income individuals get to their jobs, job training, job interviews or schools.

2012 Transportation Master Plan

In 2012, the Boulder County Board of Commissioners adopted an updated *Transportation Master Plan*. The TMP identifies programs, services, and facilities that Boulder County will implement to help people get where they need to go in a safe, efficient, and environmentally sensitive manner. Investments in the transportation system include improvements to the county's transportation corridors and bicycle, pedestrian, transit, and roadway networks. They also include programs and services to improve access to transportation and provide options for different ways to travel. The TMP includes recommendations in these different areas.

One of the goals of the Transportation Master Plan is to "Ensure equitable access to the transportation system. Ensure that adequate transportation exists for all users regardless of age, income, or ability."

The following are accessibility goals and implementation actions from this plan:

Goals

- Identify existing transportation needs, resources, and gaps
- Share and distribute information about transportation resources and options
- Develop solutions to specific transportation challenges
- Pursue additional transportation funding opportunities
- Integrate and expand existing transportation programs into the human services transportation network
- Develop an organizational structure for collaborating and coordinating human service transportation resources and needs

Implementation Actions

Expand Transportation Options:

- Expand and enhance mobility options for older adults, people with disabilities, individuals with low income, and others living with mobility limitations

- Increase bike-to-transit workshop and earn-a bike programs to provide transportation options and make bus travel more accessible

Increase Personalized Travel Training

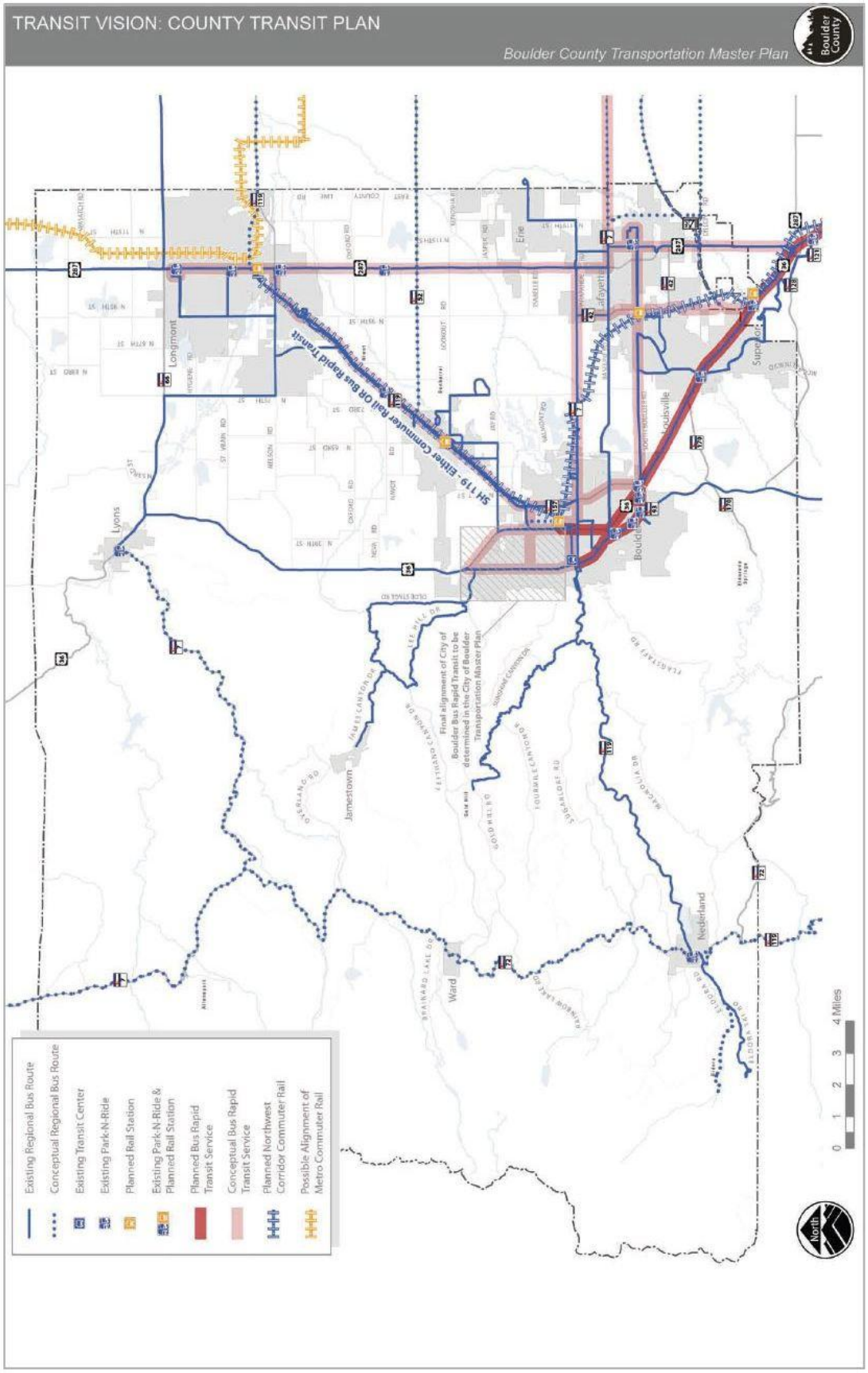
- Provide individual and group travel training to teach people with limited mobility how to safely and confidently use public transportation
- Publish and distribute maps and other information to educate all groups about the availability of transportation options
- Support 'one-call' information and referral services to help those faced with mobility challenges

Provide Transit Pass Assistance

- Distribute subsidized transit passes for assisted housing sites for those who need transportation support
- Increase housing-based or community-wide Eco Passes to enable more transit use

Planned Service Route and Transit Facility Expansion

The map on the following page shows the location of existing and planned transit routes and facilities included in the Boulder County TMP.


TRANSIT VISION: COUNTY TRANSIT PLAN
Boulder County Transportation Master Plan
Boulder County
Longmont
Lyons
Erie
Lafayette
Louisville
Superior
Boulder
Jamestown
Ward
Nederland
SH 119 - Either Commuter Rail OR Bus Rapid Transit
Final alignment of City of Boulder Bus Rapid Transit to be determined in the City of Boulder Transportation Master Plan
Existing Regional Bus Route
Conceptual Regional Bus Route
Existing Transit Center
Existing Park-N-Ride
Planned Rail Station
Existing Park-N-Ride & Planned Rail Station
Planned Bus Rapid Transit Service
Conceptual Bus Rapid Transit Service
Planned Northwest Corridor Commuter Rail
Possible Alignment of Metro Commuter Rail
0 1 2 3 4 Miles
North

Public Housing Authorities

Questionnaires: Tenant Selection Policies, Practices & Housing Accessibility

There are three public housing authorities located in the Consortium area: Boulder County Housing Authority; Boulder Housing Partners, the City of Boulder's housing authority; and Longmont Housing Authority. To better understand practices around fair housing, staff at each was asked to complete a questionnaire regarding their tenant selection policies, practices and housing accessibility. Below are each housing authority's responses to our questionnaire.

Boulder County Housing Authority

Date: 10/14/14

1. What are the application and tenant selection and assignment policies of PHAs?
   BCHA keeps a time and date waitlist for our federally subsidized properties and HCV. For our affordable and LIHTC properties, we advertise when units become available. We adopt property specific tenant selection plans, and are currently in the process of a comprehensive review and update of our TSPs. For the HCV program, our policies are adopted by our Board through our Admin Plan.

2. Has the PHA been found to be in noncompliance with one or more civil rights laws and regulations? If so what corrective action was taken?
   BCHA was selected for a Fair Housing Review of Josephine Commons in November of 2012. We are currently in a Voluntary Compliance Agreement with HUD's office of Fair Housing, and are working through the corrective actions recommended.

3. Is there a concentration of racial or ethnic groups in one or more public housing developments? Has any effort designed specifically to desegregate these development been undertaken by the PHA?
   No. BCHA only operates one public housing site for a total of 13 units. Residents of the site have diverse mix of racial and ethnic backgrounds.

4. Does PHA policy permit applicants to reject several unit offers without losing their place on the waiting list? What are the bases for rejecting an offer of a unit?
   Yes. Applicants can reject two units before losing their place on the waitlist. An applicant does not need to provide a reason for rejecting a unit.

5. Are Section 8 certificates transportable across PHA and other administering agency boundaries? Does the PHA actively promote mobility through cooperative efforts with other agencies in the region? What are the results of these efforts?
   Yes. BCHA actively promotes mobility, and has never denied a port out. We also have an IGA agreement with Longmont Housing Authority and Boulder Housing Partners so that voucher users may move throughout Boulder County without completing the portability process.

6. Do the policies and procedures of the PHA discourage or reject applications from households that do not reside in their jurisdiction by imposing residency requirements or other local preferences?
   BCHA does provide preference points on our waitlist for those who live, work, or go to school in Boulder County. The preference points apply to HCV, Public Housing, and Multifamily. Other programs such as Rural Development, LIHTC, and affordable rentals do not have geographically based preferences.

7. Does the PHA assist voucher holders who have received vouchers from PHs in other jurisdictions?
   Yes, BCHA is currently accepting port-ins. In the past 12 months, we have assisted several clients who wished to move our community.

8. Does the PHA assist voucher holders who are persons with disabilities?
   Yes. BCHA builds properties to be accessible and visit-able above and beyond what is required by code. In our voucher population, over 30 percent of participants are persons with disabilities, well above what is typical in the population at large. BCHA has an active Reasonable Accommodation Committee to ensure that persons with disabilities can have modifications to policies and physical environments to ensure their housing needs are met.

9. Does the PHA help all voucher holders find suitable housing?
   Yes. BCHA eligibility coordinators provide up to date lists of landlord's accepting vouchers and work closely with landlord and community relations committees to do outreach to new and existing landlords. Eligibility coordinators also provide recommendations about active housing search websites and referrals to case management where appropriate for populations who might need additional help with their housing search.

10. Does this assist include providing up-to-date information about suitable and available housing?
    Yes.

11. What steps are taken by the PHA to help voucher holders with disabilities or are mobility impaired to find suitable housing?
    In addition to the actions in #9, BCHA works closely with case managers and non-profit partners such as Mental Health Partners, Sister Carmen, Emergency Family Assistance, Our Center, Center for People with Disabilities, and Imagine – all of whom support our voucher holders with disabilities.

12. What are the PHA policies for admitting persons with mental and other nonphysical disabilities? Are these persons restricted to certain developments?
    BCHA doesn't distinguish between nonphysical and a physical disability in our waitlist management – either one receives equal points.

13. Has the PHA completed its Section 504 assessments of need for housing or other assistance among households with members who are disabled and what are their plans for meeting these needs?
    BCHA actively seeks opportunities to reduce barriers for persons with disabilities. We promote and educate on our reasonable accommodation process to ensure that residents and applicants with disabilities have their needs met. We provide regular training for staff, and have a multi-discipline panel review all requests. As we plan for new developments and programs we actively seek opportunities to further meet the needs of people in the community with disabilities.

14. Has the PHA completed a self-evaluation of its policies, procedures and practices to determine whether they may adversely impact persons with disabilities during the application or tenanting process? If so, have they corrected all identified deficiencies?
    In 2012 we updated our Reasonable Accommodation process. We are currently in the process of a comprehensive review and update of our TSPs, Admin Plan, and other policies with an eye towards making them more costumer friendly and current with best practices. We have committed to a training cycle with all property management, section 8 and maintenance staff receiving a full day of Fair Housing training at least every other year, and on the alternate years, VAWA training.

15. Has the PHA conducted a needs assessment to identify need for accessible units and does it have a transition plan to assure access?
    BCHA relies upon the Needs Assessments completed by the HOME Consortium and the periodic market studies we conduct to support our new housing developments. In the wake of the 2013 Flood, several housing needs assessments were conducted. We have not completed a needs assessment specific to accessible units.

16. What steps has the PHA taken to assure that persons with disabilities have access to the same range of housing choices and types as are offered to persons without disabilities?

BCHA provides preference points on our waitlist for persons with disabilities, and is proactive in creating links to resources with service providers for this population. Through our Housing Stabilization Program, we have deposit assistance to lower barriers to entry on stable housing.

17. Has the PHA identified funding resources and develop program to provide funds and incentives to make privately-owned housing units accessible to persons with disabilities?
    Yes. Over the years, BCHA has developed funding sources and projects to respond to the needs of persons with disabilities. We provide a rehab program in which we can make upgrades to privately owned homes to install safety and accessibility improvements. We have also applied for and received specific funding for persons with disabilities such as VASH and NED vouchers that are used in the private market.

Boulder Housing Partners (City of Boulder Housing Authority)

1. What are the application and tenant selection and assignment policies of PHAs?
   To be eligible for the Section 8 Housing Choice Voucher and Public Housing programs:

   - *The applicant family must:*
     - *Qualify as a family as defined by HUD and the PHA.*
     - *Have income at or below HUD-specified income limits.*
     - *Qualify on the basis of citizenship or the eligible immigrant status of family members.*
     - *Provide social security number information for household members as required.*
     - *Consent to the PHA's collection and use of family information as provided for in PHA-provided consent forms.*
   - *The PHA must determine that the current or past behavior of household members does not include activities that are prohibited by HUD or the PHA.*

2. Has the PHA been found to be in noncompliance with one or more civil rights laws and regulations? If so what corrective action was taken?
   No

3. Is there a concentration of racial or ethnic groups in one or more public housing developments? Has any effort designed specifically to desegregate these development been undertaken by the PHA? *No*

4. Does PHA policy permit applicants to reject several unit offers without losing their place on the waiting list? What are the bases for rejecting an offer of a unit?

Yes, for Public Housing, applicants can refuse the first offer for any reason. If the second offer is refused without an approved reasonable accommodation request, their application is inactivated.

5. Are Section 8 certificates transportable across PHA and other administering agency boundaries? Does the PHA actively promote mobility through cooperative efforts with other agencies in the region? What are the results of these efforts?
   Section 8 vouchers administered through Boulder Housing Partners can be used anywhere in Boulder County. If voucher holders wish to live outside of Boulder County, they can port to the Housing Authority that has jurisdiction over the area in which they wish to live.

6. Do the policies and procedures of the PHA discourage or reject applications from households that do not reside in their jurisdiction by imposing residency requirements or other local preferences?
   For the Section 8 Housing Choice Voucher and Public Housing Programs, preference is given to those applicants who live and/or work within the city limits of Boulder first. BHP also serves those applicants who are elderly, persons with disabilities and families with children over other household types (ex. Non-elderly, non-disabled single-person applicant households).

7. Does the PHA assist voucher holders who have received vouchers from PHAs in other jurisdictions?
   If a voucher holder who has received a voucher from another PHA outside of Boulder County wishes to live within the city limits of Boulder, the voucher is then administered through BHP.

8. Does the PHA assist voucher holders who are persons with disabilities?
   Yes. BHP has 231 vouchers that are specifically for households whose head, co-head, or spouse are less than 62 years of age and a person with a disability.

9. Does the PHA help all voucher holders find suitable housing?
   BHP has limited resources to assist in finding suitable housing, but offers a list of landlords who accept Section 8 vouchers, as well as other referrals as available.

10. Does this assist include providing up-to-date information about suitable and available housing?
    Yes, when it is available.

11. What steps are taken by the PHA to help voucher holders with disabilities or are mobility impaired to find suitable housing?
    We are aware of certain landlords or units that are accessible and provide this information to voucher holders who are in need of this information. We also refer people

to the Center for People with Disabilities, or Mental Health Partners for more information.

12. What are the PHA policies for admitting persons with mental and other nonphysical disabilities? Are these persons restricted to certain developments?
    No, they are not restricted to certain developments, provided the household qualifies for the unit size available at the development. We do have a limited number of units with additional subsidy that is designated for people with mental disabilities. Services through mental health are attached to the units.

13. Has the PHA completed its Section 504 assessments of need for housing or other assistance among households with members who are disabled and what are their plans for meeting these needs? *The Section 504 self-assessment will be updated in Qtr 4 2014.*

14. Has the PHA completed a self-evaluation of its policies, procedures and practices to determine whether they may adversely impact persons with disabilities during the application or tenanting process*? If so, have they corrected all identified deficiencies? BHP has a comprehensive accommodation policy outlined for applicants and current residents with an overall goal to serve all people fairly. BHP has no identified deficiencies in this area.*

15. Has the PHA conducted a needs assessment to identify need for accessible units and does it have a transition plan to assure access?
    We are in the process of conducting a market study for our public housing residents that will include questions regarding need for accessible units as the properties are rehabbed. Market studies are completed for all new construction.

16. What steps has the PHA taken to assure that persons with disabilities have access to the same range of housing choices and types as are offered to persons without disabilities?
    All applicants and residents of BHP are informed of their right to choose the housing that best fits their needs. BHP has and follows an affirmative marketing plan.

17. Has the PHA identified funding resources and develop program to provide funds and incentives to make privately-owned housing units accessible to persons with disabilities?
    Yes, BHP is aware of certain funds that are available to assist those households who need modifications made and refer when needed.

Longmont Housing Authority

Date: 10/17/14

1. What are the application and tenant selection and assignment policies of PHAs?
   The application process is by lottery application and anyone can apply. Tenant selection is by lottery number and then they income qualify once their lottery number is drawn.

2. Has the PHA been found to be in noncompliance with one or more civil rights laws and regulations? If so what corrective action was taken? *No*

3. Is there a concentration of racial or ethnic groups in one or more public housing developments? *No*

4. Does PHA policy permit applicants to reject several unit offers without losing their place on the waiting list? What are the bases for rejecting an offer of a unit?
   No they do not lose their place on the wait list and we don't specify bases for rejecting a unit.

5. Are Section 8 certificates transportable across PHA and other administering agency boundaries? Does the PHA actively promote mobility through cooperative efforts with other agencies in the region? What are the results of these efforts?
   Section 8 vouchers are actively ported to all area agencies outside of Boulder County when a tenant requests a port.

6. Do the policies and procedures of the PHA discourage or reject applications from households that do not reside in their jurisdiction by imposing residency requirements or other local preferences?
   The Lottery drawing does have a local preference.

7. Does the PHA assist voucher holders who have received vouchers from PHAs in other jurisdictions? *Yes*

8. Does the PHA assist voucher holders who are persons with disabilities? *Yes*

9. Does the PHA help all voucher holders find suitable housing? *Yes*

10. Does this assist include providing up-to-date information about suitable and available housing? *Yes*

11. What steps are taken by the PHA to help voucher holders with disabilities or are mobility impaired to find suitable housing?
    LHA provides affordable housing units through a waiting list for disabled and non-

disabled voucher holders. LHA provides landlord contacts and encourages work with non-profit resource providers for available units.

12. What are the PHA policies for admitting persons with mental and other nonphysical disabilities? Are these persons restricted to certain developments?
    LHA does not have a specific policy they are eligible like any qualifying family or elderly person.

13. Has the PHA completed its Section 504 assessments of need for housing or other assistance among households with members who are disabled and what are their plans for meeting these needs? *Yes*

14. Has the PHA completed a self-evaluation of its policies, procedures and practices to determine whether they may adversely impact persons with disabilities during the application or tenanting process? If so, have they corrected all identified deficiencies?
    LHA did a complete revision to our Administrative Policy in 2013 and we also complete annual updates to our Administrative Policies and do not have any procedures or practices that would adversely impact persons with disabilities.

15. Has the PHA conducted a needs assessment to identify need for accessible units and does it have a transition plan to assure access?
    LHA has not conducted an assessment

16. What steps has the PHA taken to assure that persons with disabilities have access to the same range of housing choices and types as are offered to persons without disabilities?
    At initial move-in or transfer LHA gives all tenants up-to-date information of all available units handicap accessible or otherwise.

17. Has the PHA identified funding resources and develop program to provide funds and incentives to make privately-owned housing units accessible to persons with disabilities?
    No, but the City of Longmont has an architectural barrier removal program.

Boulder and Broomfield County Property Tax Practices

Overall, the practices around assessing property taxes in Boulder and Broomfield Counties do not appear to be overly burdensome for protected classes and offer a number of protections for seniors, who are proportionally more likely to have a disability and live on a fixed income, and disabled veterans.

General Trends

According to the City of Boulder Homeownership Program, In Boulder County in 3rd quarter 2014, a home affordable to a moderate-income (under 80% AMI) household would be valued at $261,227. The 2014 tax assessment on a house of this value would be $1,489, which represents 1.9% of that 80% AMI household's income. That same home in Broomfield County would be assessed a somewhat higher rate, $1,907.

Between 2005 and 2010, the three-year median property tax rates in Boulder County, Broomfield County and the United States have all increased. The rate of increase in Boulder and Broomfield counties has been lower than in the United States overall.

Three-Year Average Median Taxes Paid, Boulder and Broomfield Counties and the United States

County	2005 to 2007	2008 to 2010	Change	Percent Change
Boulder	$1,870	$2,057	$187	10%
Broomfield	$1,768	$1,894	$126	7%
United States	$1,755	$2,018	$263	15%

Source: The Tax Foundation, website accessed July 25, 2014
Note: Only three-year average rates available for Broomfield County.

Homestead and Veterans Exemption

In Colorado, two programs, the Homestead Exemption and the Veterans Exemption, exempt age 65+ households that have owned and occupied their home for 10 or more years and disabled veterans from a portion of property taxes. Seniors also have the option to defer half or all of their taxes until the property is sold. Additionally, Boulder County offers the Senior Tax Worker program, which allows Boulder County residents ages 60+ to work off the Boulder County portion of their property taxes up to $1,000. Since seniors have a higher incidence of disability than the population overall, all of these programs benefit those with disabilities, a protected class.

Appendix IV. Private Practices Impacting Fair Housing

Introduction

In this section we overview private practices that impact fair housing in the Boulder Broomfield Regional Consortium.

Home Lending Practices

Concern about discriminatory lending practices in the 1970s led to the requirement for financial institutions to collect and report Home Mortgage Disclosure Act (HMDA) data. In this section we examine these data to identify any lending patterns related to racial and ethnic protected classes in the Consortium area.

Denver Metro Area Fair Housing Center Rental Discrimination Study

In February 2014, the Denver Metro Fair Housing Center issued a report titled *Access Denied: A Report on Rental Housing Discrimination in the Denver Metro Area*. While the report authors admit that their methodology was not robust, and only a few of the properties included in the study were located in the Consortium area and it is unclear from the study whether or not discriminatory practices were observed at those properties, the study findings portray concerning discriminatory practices in the market-rate rental housing sector. We provide an overview of the practices observed.

Home Lending Practices

This section examines HDMA data for evidence of disparity in lending outcomes by race and Hispanic ethnicity. We look at the data at the county level and separately examine practices in the two Consortium counties; Boulder County and Broomfield County.

Boulder County

Loan Denial

This table overviews the rates of loan denial by race and Hispanic ethnicity in Boulder County.

Loan Denial by Race and Ethnicity, Boulder County, 2013

	Loans		
Race and/or Ethnicity	Originated	Denied	Denial Rate
White Non-Hispanic	11,951	1,850	15%
Hispanic	552	174	32%
Asian	503	64	13%
Black or African American	65	24	37%
Native Hawaiian and Pacific Islander	30	9	30%
American Indian and Alaska Native	37	19	51%

Source: HDMA data, 2013

Findings: Though loan originations are much fewer for racial and ethnic minorities in Boulder County, loan denial rates are much higher for all but Asian borrowers indicating a disparity.

Reasons for Loan Denial

This table presents data on reasons for loan denial in Boulder County that could inform policies or program creation, namely debt-to-income ratio and credit history. For some race categories data are quite limited and therefore cannot be interpreted to indicate a definitive trend, but may suggest further examination.

Race, Ethnicity and Loan Denial, Boulder County, 2013

Race and/or Ethnicity	Loans Denied	Reason for Denial			
		Debt/Income Ratio		Credit History	
		#	%	#	%
White Non-Hispanic	1,850	454	25%	249	13%
Hispanic	174	27	16%	49	28%
Asian	64	18	28%	13	20%
Black or African American	24	1	4%	3	13%
Native Hawaiian and Pacific Islander	9	3	33%	6	67%
American Indian and Alaska Native	19	4	21%	8	42%

Source: HDMA data, 2013

Findings:

- Debt-to-income ratio or risk of “over borrowing” didn’t appear to be a larger factor for any racial or ethnic minority than for white non-Hispanic would-be borrowers. (A disparity may exist for Native Hawaiian and Pacific Islanders; however the overall count of loan denials for this group is quite small. Further analysis would be necessary to form a conclusion.)
- Interestingly, debt-to-income ratio and credit explain very few – only four of 24 – loan denials for Blacks or African Americans.
- Would-be borrowers of Hispanic origin were denied at lower rates because of debt to income ratio and at higher rates due to credit history.
- All minorities with the exception of Black or African Americans were more likely to be denied a loan as a result of their credit history. Credit history includes not only poor credit, but also the use of credit, therefore practices around the use of credit could be a factor in this disparity.

Broomfield County

Loan Denial

This table overviews loan denial rates by race and Hispanic ethnicity in Broomfield County.

Loan Denial by Race and Ethnicity, Broomfield County, 2013

Race and/or Ethnicity	Originated	Loans Denied	Denial Rate
White Non-Hispanic	2,449	354	14%
Hispanic	147	54	37%
Asian	181	38	21%
Black or African American	15	7	47%
Native Hawaiian and Pacific Islander	10	4	40%
American Indian and Alaska Native	13	4	31%

Source: HDMA data, 2013

Findings:

- Fifteen or fewer loans were originated for each of the following racial minorities in 2013: Black of African American, Native Hawaiian and Pacific Islander and American Indian and Alaska Native.
- In Broomfield County, all racial and ethnic minorities experience loan denials at a higher (and in some cases much higher) rate than white non-Hispanics.

Reasons for Loan Denial

This table presents reasons for denial in Broomfield County. Please note that for some race categories the data is quite limited and therefore cannot be interpreted to indicate a definitive trend, but may suggest further examination.

Race, Ethnicity and Loan Denial, Broomfield County, 2013

Race and/or Ethnicity	Loans Denied	Reason for Denial			
		Debt/Income Ratio		Credit History	
		#	%	#	%
White Non-Hispanic	354	61	17%	60	17%
Hispanic	54	13	24%	8	15%
Asian	38	7	18%	2	5%
Black or African American	7	2	29%	5	71%
Native Hawaiian and Pacific Islander	4	1	25%	1	25%
American Indian and Alaska Native	4	0	0%	2	50%

Source: HDMA data, 2013

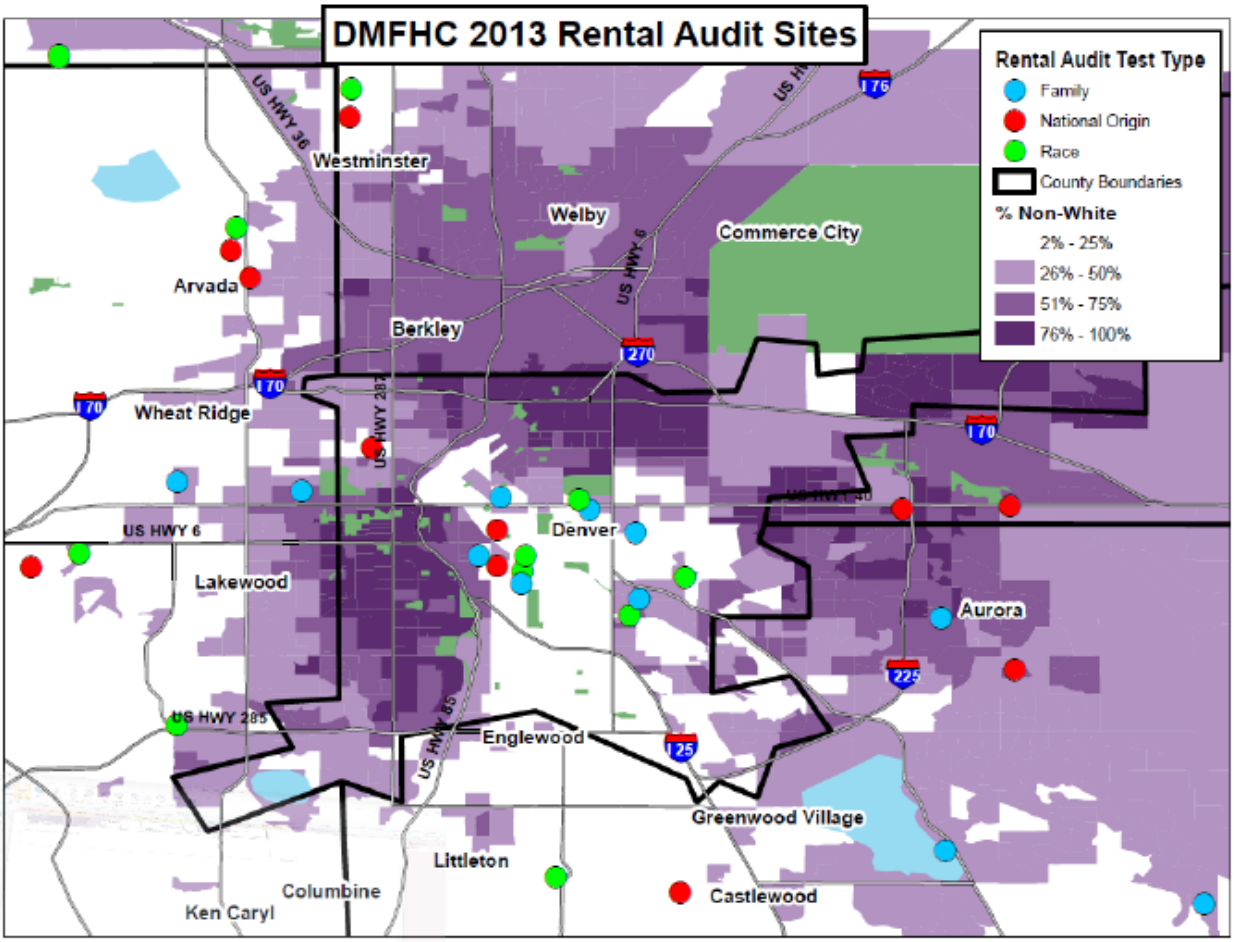
Findings:

- Based on the dearth of data and relative similarity in denial rates, it is difficult to determine if there is a significant disparity in loan denials by race and ethnicity because of debt-to-income ratio though it does not appear to be the case.
- The high rates of loan denials for credit history among Black or African American borrowers is worthy of further examination to determine if a disparity exists for these would-be borrowers.

Denver Metro Area Fair Housing Center Rental Discrimination Study

In February 2014, the Denver Metro Area Fair Housing Center released a rental housing discrimination study. The study focused on the following protected classes: race, familial status and national origin. Thirty-four matched pairs visited 28 housing providers located in census tracts with lower minority concentrations scattered throughout the Denver MSA and inquired about housing availability. Though the sample size was small, the findings were highly concerning. Differential treatment was found across these protected classes; in 8 of 12 tests (67%) white testers experienced more favorable treatment; in 8 of 11 tests (73%) testers without children received favorable treatment; and in 10 of 11 tests (91%) white testers were treated more favorably than Latinos. Based on the map included in the study, it appears that no more than three tests – possibly fewer – were conducted in the Boulder/ Broomfield market; however the rates of discrimination were significant enough and proximate enough to assume they might hold in the Boulder/Broomfield area and we should define strategies to address such discrepancies.

Map from Denver Metro Fair Housing Center Report Access Denied: A Report on Rental Housing Discrimination in the Denver Metro Area



Source: 2010 Census Block Group Data & Open Colorado Data Catalogue

Appendix V. Fair Housing Activities

Introduction

The Consortium area offers a number of resources for residents needing information, support and protection as it pertains to Fair Housing. Locally, these services include, but are not limited to, the City of Boulder Office of Human Rights, the City of Longmont Community & Neighborhood Resources; Boulder County Consumer Affairs Community Protection Division, The Center for People With Disabilities; Boulder County Legal Services; University of Colorado (CU) Gay Lesbian Bisexual Transgender Queer Resource Center; CU Off-Campus Housing & Neighborhood Relations; CU Women's Resource Center; Boulder County Aging Services Lesbian, Gay, Bisexual, and Transgender Older Adults. Discrimination cases may be filed with the City of Boulder Office of Human Rights (for city residents), the City of Longmont Community & Neighborhood Resources Division (for Longmont residents), the Colorado Department of Regulatory Agencies (DORA) Division of Civil Rights (for Colorado residents), and HUD's Office of Fair Housing and Equal Opportunity (for U.S. residents).

City of Boulder Office of Human Rights

The City of Boulder's Office of Human Rights, under the Department of Human Services, provides oversight and enforcement for Boulder's Human Rights Ordinance, the local anti-discrimination law, which protects against illegal discrimination in the areas of housing, employment and public accommodation. The Office also supports Boulder's Human Relations Commission in social policy development and its role as the quasi-judicial body for resolution of Human Rights Ordinances cases.

City of Longmont Community and Neighborhood Resources

The City of Longmont Community and Neighborhood Resources, whose mission is to help residents build healthy relations, access services and resources that will enhance their quality of life, and build capacity to fully participate in their neighborhood and community, wants to ensure maximum community participation by empowering Longmont citizens to access community resources and services, and by ensuring cultural sensitivity throughout the community. To this end, they provide mediation and facilitation for cultural conflicts between neighbors, within neighborhoods, and community groups to open lines of communication and build a respectful understanding of differences and similarities.