

STATE OF COLORADO

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

2005-2010



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FOREWARD

WHAT IS FAIR HOUSING?

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended in 1988,

“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 (including children under the age of 18 living with parents of legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap (disability).”

Colorado statutes include marital status, creed and ancestry with those federal definitions of Fair Housing. It also violates the law to refuse to make reasonable accommodations for persons with disabilities or to harass or interfere with a person exercising their Fair Housing rights.

Fair Housing is the process and vehicle for ensuring those protections.

TDD 1-800-327-8877



Executive Summary

This report uses key informant interviews, in-house research, literature review, data collection/data evaluation and geographic information systems (GIS) to update the State of Colorado Analysis of Impediments to Fair Housing as a requirement of the U.S. Department of Housing and Urban Development (HUD).

According to HUD, impediments to fair housing choice include actions or omissions in the state that constitute violations of the Fair Housing Act. Further, impediments mean actions or omissions that are counter-productive to fair housing choice or that have the effect of restricting housing opportunities based on protected classes.

The following issues are shown to be potential impediments to fair housing choice in the State of Colorado:

(1) Lack of an Adequate Supply of Affordable Housing. Research determined that the greatest barrier to fair housing in Colorado is the lack of affordable units that can ensure fair housing choice. The lack of affordable housing cuts across all protected classes.

(2) Inadequate Supply and Condition of Housing for Persons with Disabilities. The supply of housing that meets the needs of persons with disabilities is inadequate. As the “baby boom” population ages, there will be increased pressure on existing accessible, affordable housing units

(3) Foreclosures. High delinquencies and foreclosures may be symptomatic of predatory and unfair lending practices. Foreclosures also affect the health of the housing market itself.

(4) Need for Fair Housing Education and Coordination. There is a need for focused leadership and a coordinated strategy to prevent impediments to fair housing. Many residents do not have access information about their rights. Housing and service agencies staff require Fair Housing training as well as advocate organizations. Information should be available in a variety of formats, including internet, written and electronic copy and versions translated to other languages.

(5) Actions of Homeowner Associations (HOAs). The Colorado Civil Rights Division (CCRD) reports a substantial increase in Fair Housing complaints against Colorado homeowner associations for refusal to accommodate persons with disabilities or special needs.

(6) NIMBY. The “Not in My Back Yard Syndrome” is an impediment to fair housing. Neighborhood opposition to affordable housing and special

needs housing populations may prevent or discourage development of affordable units.

(7) Language/Cultural Issues. Persons who do not speak English may be vulnerable to discrimination or unfair acts.

(8) Familial Status. The definition of “family” in zoning/building codes may severely limit the number of unrelated persons living in a unit.

(9) Land Use Regulations. Land use regulations may increase the cost of housing and create impediments to fair housing choice.

(10) Predatory Lending Practices. Mortgage lending practices of sub-prime lenders may prey upon low-income and minority populations.

(11) Transportation. The lack of affordable housing along transit routes is an impediment to fair housing.

(12) Landlord/Tenant Issues

- **Need for Timely Response from Landlords**
- **Illegal Evictions.** Tenants in some high demand areas of the state may be illegally evicted to make way for higher paying tenants.

(13) Housing Discrimination. Data shows the highest conventional purchase loan denial rates were for blacks and Hispanics which may indicate housing discrimination.

(14) Steering. Steering is a practice of guiding prospective homebuyers or renters of protected classes (such as color, race, religion, disability, familial status, etc.) to areas with concentrations of persons in those groups.

(15) Income/Wage Levels versus Cost to Rent or Purchase. Wages in Colorado have not kept pace with the cost of living.

(16) Lack of “Visitability”. Homes built with visitable features enhance livability for disabled residents, and often allow non-disabled residents to remain in their homes as they age, reducing the cost of retrofit of the dwelling. In addition, a visitable home allows residents to more easily welcome guests of all abilities into their home.

(17) Lack of Housing for the Homeless. The Summer 2006 and Winter 2007 Statewide Homeless Counts estimated that 16,203 persons were homeless on the night of August 28, 2006. This includes a lack of housing for persons released from mental health facilities and prisons.

This Analysis of Impediments suggests actions for reducing or eliminating these impediments.

STATE OF COLORADO

Analysis of Impediments to Fair Housing Choice

2005-2010

I. INTRODUCTION

This Analysis of Impediments to Fair Housing & Housing Choice 2005-2010 is an update of the document published by the Colorado Department of Local Affairs, Division of Housing in 1996.

In 1994, the United States Department of Housing and Urban Development (HUD) published a rule that consolidated the Comprehensive Housing Affordability Strategy (CHAS), the Community Development Plan (required for the Community Development Block Grant program), and submission and reporting requirements for four community development formula grant programs into a single plan, which is called the Consolidated Plan for Housing and Community Development. As part of the Consolidated Plan, HUD requires the state of Colorado to certify it will affirmatively further fair housing. This requires the state to undertake fair housing planning and:

- Complete an Analysis of Impediments to Fair Housing Choice (AI);
- Take actions to overcome effects of any impediments identified through the analysis; and
- Maintain records reflecting the analysis and actions taken.

According to HUD, impediments to fair housing choice include actions or omissions in the state that constitute violations of the Fair Housing Act. Further, impediments mean actions or omissions that are counter-productive to fair housing choice or that have the effect of restricting housing opportunities based on protected classes.

II. METHODOLOGY

The State of Colorado conducted its analysis using both primary and secondary data sources. The main sources of primary data in this analysis were key informant surveys, interviews, consultations, personal contacts, electronic mail (email), and phone survey. Secondary information included statistics from published databases, maps, documents and studies.

Additionally, the state requested a release of U.S. Housing and Urban Development (HUD) Fair Housing complaints data through the Freedom of Information Act.

PRIMARY SOURCES:

CONSULTATIONS:

Deborah Cameron, Colorado Coalition for the Homeless
Lee Carter, Colorado Workforce Centers
Teresa, Duran, Colorado Division of Housing
Autumn Gold, Colorado Division of Housing
Vikki Gold, Atlantis Community
Tony Hernandez, Fannie Mae
Kimberly Johnson, Fannie Mae
Neighborhood Services, City of Grand Junction
Wendell Pryor, Colorado Civil Rights Division
Nancy Snow, Colorado Civil Rights Division
Robert Thompson, Colorado Division of Housing
Laurie Tomlinson, Colorado AIDS Project
Kathi Williams, Director, Colorado Division of Housing
Sally Yerger, Colorado Civil Rights Division

KEY INFORMANT INTERVIEWS:

Tim Thornton, Atlantis Community, Denver
Terrance Turner, Atlantis Community, Denver
Linda Taylor, Center for Independence, Grand Junction
David Bolin, Center for People with Disabilities, Boulder
Nancy Jackson, Disabled Resource Services, Fort Collins
Vicki Skoog, Colorado Springs Independence Center
Evelyn Tileston, Independent Life Center, Craig
Beth Danielson, Connections for Independent Living, Greeley
Statewide Independent Living Council
Denise Wise, Gunnison Housing Authority
Char Irvine, National Alliance on Mental Illness
Lacey Berumen, National Alliance on Mental Health
Mary Anderies, Consultant, Developmental Pathways

PHONE SURVEYS – TYPES OF ORGANIZATIONS/PERSONS

Housing Authorities
Real Estate Professionals
Community Development Housing Organizations
Property Managers
Nonprofit Housing Professionals
For-Profit Housing Development Professionals
State and Local Government Officials
Homeless and Domestic Violence Shelters
Senior Housing Providers
Transitional Housing Providers

EMAILS RECEIVED REGARDING FAIR HOUSING CONCERNS

Colorado AIDS Project
Colorado Workforce Centers – Various locations
Gunnison Housing Authority
Homeward Bound of the Grand Valley, Grand Junction
Housing Solutions for the Southwest, Durango
Lamar Housing Authority, Prowers County
The Pinon Project, Cortez
Posada, Pueblo
Women's Crisis and Family Outreach Center, Douglas and Elbert Counties

SECONDARY SOURCES:

STATE AND LOCAL DOCUMENTS:

American Community Survey, 2005
Comprehensive Planning Documents Reviewed
 City of Aurora
 City of Grand Junction
 City of Fort Collins
 City of Loveland
 City of Greeley
Final Report, Colorado Blue Ribbon Panel on Housing, 2005
Online Reports,. Colorado Department of Labor and Employment
Online Reports, Colorado Department of Local Affairs, Division of Housing
Colorado Department of Local Affairs, Division of Local Governments,
 Demography Section
Online Reports, Colorado Workforce Center - On-Line Documents
Continuum of Care Documents
 Metropolitan Denver Homeless Initiative
 Homeward Pikes Peak Continuum of Care
 Colorado Balance of State Continuum of Care
Public Housing Authority Plans
Statewide Summer Homeless Count, August 28, 2006
Statewide Winter Homeless Count, January 29, 2007
State of Colorado, Department of Human Services, Supportive Housing and
 Homeless Programs PHA Plan
State of Colorado Division of Housing PHA Plan
State of Colorado Division of Housing Policies, Procedures and Statistics
 Section 8 Homeownership Program
 Down Payment Assistance Program
 Single Family Owner Occupied Rehabilitation Program
 Tenant Based Rental Assistance Program
 HOME Program
 Community Development Block Grant (CDBG)
 Emergency Shelter Grant Program (ESG)
 Housing Opportunities for Persons with AIDS (HOPWA)

REFERENCES

- America's Rental Housing – Homes for a Diverse Nation*, Harvard Joint Center for Housing Studies, 2006
- A Guide to Colorado Legal Resources for Native Americans*
- A Heavy Load: The Combined Housing and Transportation Burdens of Working Families*; Center for Housing Policy, October 2006
- Colorado State Profile**, 2007 Center for Disease Control and Prevention, *Estimates Of Households By Income for Colorado and Its Regions*, Bill Kendall, 2007
- Facts Book*, Housing Colorado, 2007
- Fair Housing Trends Report*, National Fair Housing Alliance, April 30, 2007
- Fair Housing Planning Guide*, U.S. Department of Housing and Urban Development
- Federal Deposit Insurance Corporation, Third Quarter, 2006
- Follow-Up Study of Housing Needs of Low-Income Populations in Colorado*, Colorado Department of Human Services, Supportive Housing and Homeless Programs, August 2003
- HIV and AIDS in Colorado, Monitoring the Epidemic, HIV/STD Surveillance Program*, Colorado Department of Health and Environment, June 2007
- Home Mortgage Disclosure Act (HMDA) – Multi year data
- HUD Fair Housing Complaints Database via Freedom of Information Act
- Knowledge Plex, Data Place – Multi-year data
- La Plata Economics: The Story of the Ute Tribe Ute Mountain Ute Tribe*
- Mobility Needs of Low Income and Minority Households Research Study*, Urban Trans Consultants, Inc.
- Population in Need of Mental Health Services and Public Agencies' Service Use in Colorado*
- Priced Out in 2006*, Housing Crisis for People with Disabilities Technical Assistance Collaborative, Inc and Consortium for Citizens with Disabilities, Housing Task Force
- Racial and Ethnic Disparities in Colorado*, 2005; p. 5 Colorado Department of Public Health and Environment
- The State of Working Immigrants in Colorado*, Colorado Fiscal Policy Institute 2004,
- State Plan on Aging, FFY 2004-2007*, Colorado Department of Human Services-Division of Adult and Aging Services, TriWEST Group
- Housing Discrimination Study - Discrimination in Metropolitan Markets*, HUD 2000",
- Phase I – African American and Hispanic*
- Phase II – Asians and Pacific Islanders*
- Phase III – Native Americans*

ENTITLEMENT AREA DOCUMENTS:

The entitlement areas that have completed an Analysis of Impediments and have provided the state with a copy are:

Arapahoe County
City of Aurora
City of Boulder
City of Colorado Springs
Douglas County
City of Fort Collins (In process of updating)
Jefferson County
City of Grand Junction
City of Greeley
City of Lakewood
City of Longmont (In process of updating)
City of Loveland (In process of updating)
City of Westminster

ENTITLEMENT COMPREHENSIVE PLAN DOCUMENTS:

The following Comprehensive Plan documents were analyzed for impediments:

Arapahoe County
City of Boulder
City of Colorado Springs
City of Grand Junction
City of Greeley

DATA BASES:

Fannie Mae, Knowledge Plex - Data Place
Federal Financial Institutions Examination Council (FFIEC), Home Mortgage Data Analysis (HMDA)
State of Colorado, Division of Local Governments, State Demography Section
U.S. Census Bureau, 2000 Census
U.S. Census Bureau, American Communities Survey, 2005
U.S. Census Bureau, On the Map V2
U.S. Department of Housing and Urban Development (HUD)
Fair Housing Complaints Data Base

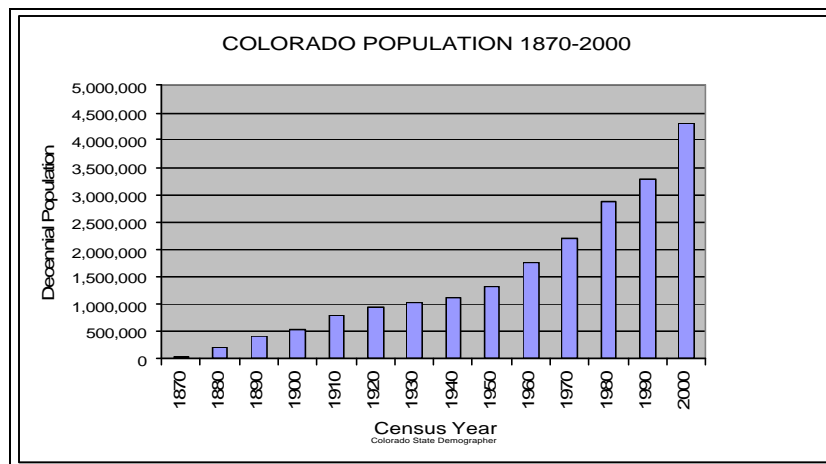
Thematic maps provide an important tool to present population characteristics, however, institutional populations such as nursing homes, hospitals or prisons, may skew population data at the county level.

III. DEMOGRAPHIC DATA

Colorado, located in the Rocky Mountain West, is a state with many faces. While best known for its ski and outdoor sport industry, Colorado is home to many small farming and ranching communities, large urban areas and small towns that have a history rooted in mining. Colorado - or “colored red” in Spanish - has a landscape of Midwest plains, snow capped mountain peaks, and desert mesas. Encompassing 104,247 square miles, Colorado is the eighth largest state in the country. It is also the highest of the 50 states, with an average altitude of 6,800 feet. While our geographic area is large, Colorado is still ranked 22nd in the nation for total population. According to the Colorado State Demographer, the total estimated population for Colorado for 2005, the most recent year available, is 4,722,755.

Denver is the largest city in Colorado with an estimated population of 571,848 in 2005. The entire metro Denver area has a population of 2,627,314¹. The Metro area is home to high tech industry, three major colleges and universities, four major league sports teams, and a thriving downtown area. Other major cities in Colorado include Aurora, Boulder, Fort Collins, Grand Junction, Greeley, Colorado Springs, and Pueblo. Figure 1 below shows Colorado's historic population growth.

Figure 1



Colorado added one million new residents between 1990 and 2000, and has added almost 350,000 since the 2000 Census. Its population is projected to increase by over three million people between 2005 and 2035². In-migration to Colorado typically accounts for nearly 3/5ths of total population growth. The remaining share of added population is attributed to natural increase - births minus deaths. Net in-migration is difficult to predict, as it fluctuates widely with both the regional and national economies, and other factors such as retirees moving in, people moving for quality of life and other intangibles.

¹ State Demographer, August 2006

² State Demographer, August 2006

In 2000, 28 percent of the population was 19 years old or younger, 17.5 percent of the population was over 55 years of age. Males accounted for 50.4 percent of the population and females 49.6 percent.

Table 1

COLORADO 2000 DEMOGRAPHIC CHARACTERISTICS			
Cohort	Number	Percent	U.S. Percent
Sex			
Female	2,152,795.00	49.6%	50.9
Male	2,185,994.00	50.4%	49.8
Age			
Under 5 Years	299,132.00	6.9%	
5 to 19 Years	935,276.00	21.6%	
20 to 24 Years	308,875.00	7.1%	
25 to 34 Years	666,656.00	15.4%	
35 to 54 Years	1,367,323.00	31.5%	
55 to 64 Years	342,546.00	7.9%	
65 Years and Over	418,981.00	9.7%	
TOTAL POPULATION	4,338,789.00	100.0%	

Source: Census 2000

Colorado's Population Forecast

The State Demographer forecasts that Colorado's population will reach 7,798,107 by the year 2035. At least 6,195,569 of those persons will live in Colorado's Front Range area, 1,026,411 on the Western Slope, 250,965 in the Central Mountains, 67,242 in the San Luis Valley and 247,920 in the Eastern Plains.

Table 2

COLORADO POPULATION (2000-2035)

REGION	2000 July 1 Estimate	2005 Projection	2010 Projection	2025 Projection	2035 Projection
COLORADO	4,338,789	4,722,460	5,209,892	6,787,307	7,798,107
Front Range	3,538,755	3,866,821	4,250,200	5,425,645	6,195,569
Denver/Boulder	2,418,292	2,627,314	2,850,055	3,543,553	3,954,344
Greeley MSA	183,560	228,729	264,853	419,741	551,288
Fort Collins MSA	253,141	271,990	296,519	403,147	473,223
Colo. Spgs. MSA	541,718	587,689	672,582	849,468	973,313
Pueblo MSA	142,054	151,099	166,191	209,736	243,401
Western Slope	468,368	513,062	585,313	854,379	1,026,411
Central Mtns.	126,179	131,784	147,571	217,820	250,965
San Luis Valley	46,416	48,521	51,720	61,728	67,242
Eastern Plains	159,071	162,272	175,088	227,735	257,920

Source: Colorado Department of Local Affairs, State Demographer's Office, August 2006

Composition of Regions

Front Range includes Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, El Paso, Jefferson, Larimer, Pueblo and Weld counties.

Western Slope includes Archuleta, Delta, Dolores, Eagle, Garfield, Grand, Gunnison, Hinsdale, Jackson, La Plata, Mesa, Moffatt, Montezuma, Montrose, Ouray, Pitkin, Rio Blanco, Routt, San Juan, San Miguel and Summit counties.

Central Mountains includes Chaffee, Clear Creek, Custer, Fremont, Gilpin, Huerfano, Lake, Las Animas, Park and Teller counties.

San Luis Valley includes Alamosa, Conejos, Costilla, mineral, Rio Grande and Saguache counties.

Eastern Plains includes Baca, Bent, Cheyenne, Crowley, Elbert, Kiowa, Kit Carson, Lincoln, Logan, Morgan, Otero, Phillips, Prowers, Sedgwick, Washington and Yuma counties.

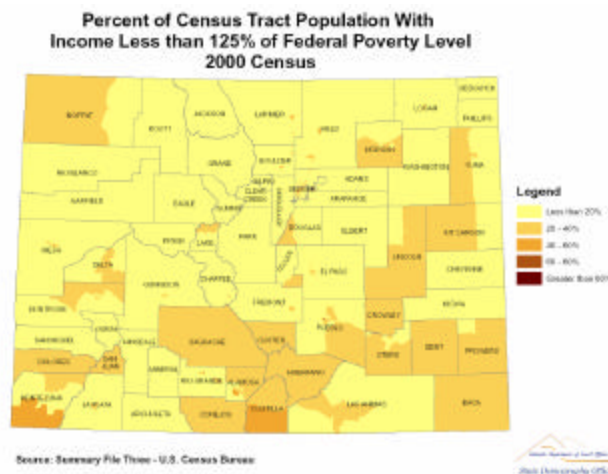
IV. LOW-INCOME AND MINORITY CONCENTRATION

Low Income Concentration

Census Bureau reported in August 2007 that the overall poverty in Colorado rose from 9.8 percent in 2003-2004 to 10.6 percent in 2005-2006.

HUD regulations define a low- to-moderate income neighborhood as one where 51 percent or more of residents are below 80 percent of the Median Family Income (MFI). Areas that comport with HUD's definitions are represented by dark polygons on the map. Where areas do not meet this criterion but still have a large number of low-income residents, they are represented by lighter colors.

Map 1



Minority and Racial Concentrations

Maps 2, 3 and 4 below demonstrate minority and racial concentrations by county.

Black/African American

In the 2000 Census, the Black/African American population in Colorado numbered 165,063, or approximately 3.8%.

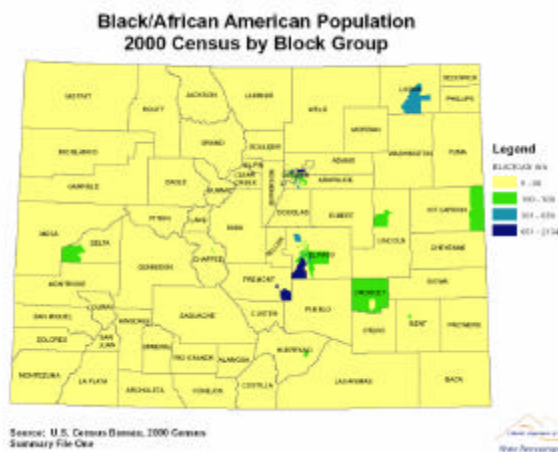
HUD published a report, "Discrimination in Metropolitan Markets Phase I", that provides national estimates of discrimination faced by African Americans and Hispanics in 2000/2001 as they searched for housing in sales and rental markets. Denver was one of the locations tested. According to the study, consistent adverse treatment against Black renters was 19.4%. The study also provides a measure of how housing discrimination has changed for these groups since 1989.

"HDS 2000 found large decreases in the level of discrimination faced by Hispanics and African Americans seeking to a buy a home between 1989 and 2000. There also was a modest decrease in discrimination toward African Americans seeking to rent a unit. "

However, results of HUD's studies using paired testing indicate that some forms of discrimination and racial steering still exist in the nation's housing markets.

"The results underscore our belief that, while housing discrimination is down in general since 1989, it still exists at unacceptable levels. Our study found that Hispanics and African Americans most often encounter discrimination when they inquire about renting a housing unit."

Map 2

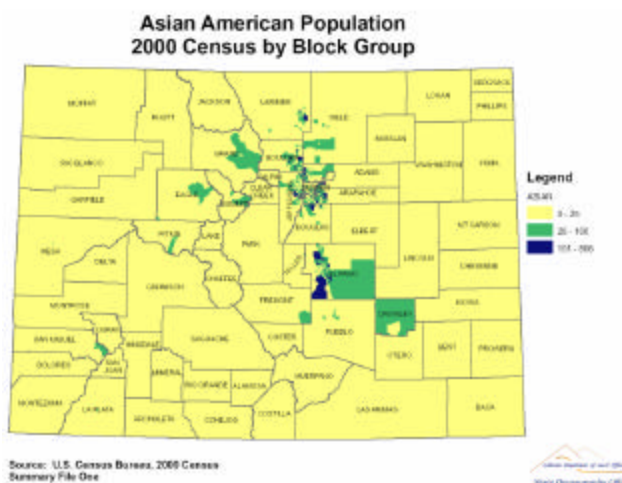


Asians/Pacific Islanders

According to *Discrimination in Metropolitan Markets Phase II*, Asians and Pacific Islanders face significant levels of discrimination when they search for housing in large metropolitan areas nationwide. The study did not, however, perform testing in Colorado for Asian Americans.

The map below shows the Asian/Pacific Islander population distribution in Colorado at the time of the 2000 Census.

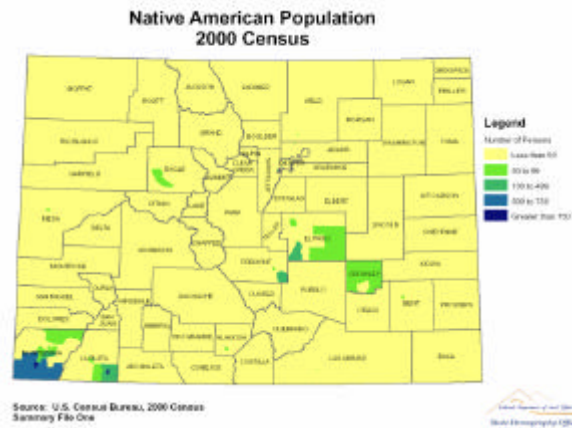
Map 3



American Indian/Alaska Native

There are two federally recognized Indian tribes in Colorado: the Southern Ute Tribe that encompasses parts of Archuleta and La Plata Counties and the Ute Mountain Ute Tribe located in Montezuma County and portions of northern New Mexico and southeastern Utah.

Map 4



Southern Ute Tribal membership (population) was 1,365 at the time of the 2000 Census, with about 75% of the Tribal members residing on the reservation³. The enrollment for the Ute Mountain Ute Tribe was 1,968 with the majority of the members living on the reservation in Towaoc, and a smaller community in White Mesa, Utah.

Many other Native American tribes are represented in Colorado including the Crow, Cheyenne, Arapahoe, Sioux, Ute, Kiowa, Comanche, Apache, Caddo, Navajo, Hopi, Nez Pierce, Shoshoni, Shebits, Kaibab, and Paiute. Census 2000 special tabulations show a total of 79,689 persons of American Indian and Alaska Native ancestry reside in Colorado. According to "A Guide to Colorado Legal Resources for Native Americans," more than 21,300 make their homes in the six county, (Adams, Arapahoe, Denver, Jefferson, Boulder and Douglas) metropolitan area. A historic migratory crossroads for numerous American Indian tribes and a former 1950's Bureau of Indian Affairs 'Voluntary Relocation Center,' Denver is often referred to as the 'Hub of Indian Country.' Unfortunately, the Native American population is one of the poorest, if not the poorest, in the state."

According to HUD's 2003 Study, *"Discrimination In Metropolitan Housing Markets Phase III – Native Americans:* "...findings clearly indicate that discrimination is a serious problem for American Indians searching for housing in metropolitan rental markets, and (sic) rigorous paired testing can and should be expanded for both research and enforcement purposes."

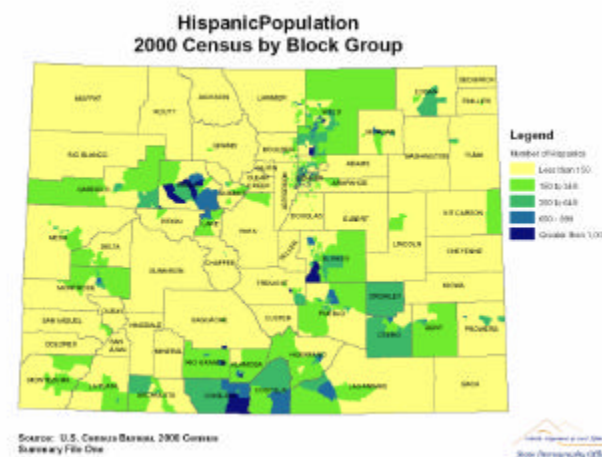
³ U.S. Census Bureau, 2005

Although homeownership is touted as one of the most important means of building personal wealth in America, Native American homeownership lags far behind other racial and ethnic groups. Only 40.7 % of Native Americans living on reservation or trust land are homeowners, according to a 2002 study by Rutgers University.

Hispanic Ethnicity

The Hispanic population has a long, rich history in Colorado as evidenced by many of Colorado's place names including Archuleta, Arriba, Baca, Cortez, Dolores, La Plata, Mesa Verde, Rio de las Animas Perdides, Rio Grande etc. In fact, the early Spanish explorations not only mapped and named many Colorado settlements, they also contributed to our language, religion, custom and culture. Some southern Colorado towns such as San Luis and Antonito retain much of their rich, Spanish history.

Map 5



Immigration is a large debate, but getting statistics on immigration is difficult when illegal families fear deportation. According to the Colorado Fiscal Policy Institute 2004 study entitled *The State of Working Immigrants in Colorado*:

"The majority of the immigrant workers surveyed came to Colorado from Mexico to find work as day laborers, and made an average of about \$15,000 a year, including tips. Most of the workers reported paying state and federal taxes, yet indicated they did not receive government benefits. For the most part, the workers did not have individual or family health care insurance coverage. They paid an average of \$571 a month in housing costs, and an average of \$149 a month in utility costs. Additionally, well over half of the workers indicated that they send money to their families in their country of origin, monthly or occasionally."

Latino immigrant families are often large, close-knit, multi-generational households. Size and relatedness of household members are issues in some Colorado jurisdictions. To stem the flow of arrivals, some communities are redefining the concept of family by limiting the number of people who are

allowed to live under one roof via building codes that limit the number of occupants according to square footage or by the number of bedrooms. Other communities already have such policies on the books, but do not rigidly enforce those laws. During interviews with service providers, six reported issues regarding family status. Additionally, nonprofit service providers worried that Spanish-speaking legal and illegal immigrants may be targeted by predatory lenders.

Studies show that immigrant families do, in fact, contribute to the economic well-being of our housing markets. On the national level, the Harvard Joint Center for Housing Studies found that immigration stabilized the housing rental market following the “baby boom” population.

“But thanks to the strength of immigrant, the number of renter households remained steady through the 1990s and early 2000s as foreign-born households supplemented the rental demand of native-born households. The arrival of young foreign born households thus tempered the decline in renters aged 25-34 from 20 percent to 12 percent, and in renters aged 35-44 from 18 percent to 7 percent over the 1994-2004 period. Indeed, without these immigrants, the total number of renters would have fallen by more than 2 million (5%) rather than rising modestly by 100,000⁴.

In its 2001 study HUD found *“large decreases in the level of discrimination faced by Hispanics and African Americans seeking to a buy a home between 1989 and 2000. There also was a modest decrease in discrimination toward African Americans seeking to rent a unit. However, the report finds that this downward trend does not apply to Hispanic renters. In fact, in the year 2000 Hispanic renters were more likely to experience discrimination in their search for housing than African American renters. ”*

MIGRANT AND SEASONAL WORKERS

According to the Colorado Department of Labor, Colorado is federally designated as a significant Migrant and Seasonal Farm Worker (MSFW) state, and the MSFW population is predominantly Spanish speaking. Migrant workers in Colorado often work in rural areas in both agricultural and in service sectors. Migrant farm workers fall into two categories: those who come for a growing season (beginning in May) and move on at about the end of October, and those who come to work in agriculture but remain in the state. It is estimated that 30,000 workers travel to Colorado to participate in agricultural work but do not stay in the state⁵.

⁴ America’s Rental Housing – Homes For A Diverse Nation” Harvard Joint Center For Housing Studies

⁵ Racial and Ethnic Disparities in Colorado 2005; p. 5 Colorado Department of Public Health and Environment

There are six Migrant and Seasonal Farm Workers (MSFW) workforce centers: in Colorado: Brighton, Greeley, Lamar, Monte Vista, Delta and Rocky Ford.⁶ These centers provide employment services to migrant and seasonal farm workers. MSFW outreach provides a full range of services such as applications, counseling, testing, job training and placement, and referral to supportive services.

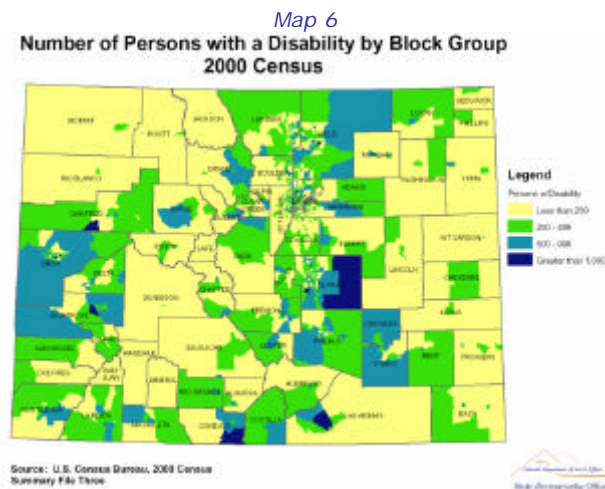
LANGUAGE/CULTURAL BARRIERS

According to the 2000 Census, 15 percent of Colorado residents speak a language other than English in the home. The Census also shows that more than 40 different languages are spoken in Colorado, with Spanish the most common non-English language.

The U.S. Census Bureau defines households in which members age 14 years and older speak a non-English language and also speak English “less than very well” as being “linguistically isolated”. According to the 2000 Census for Colorado, ten counties with the largest numbers of linguistically isolated households are Denver, Adams, Jefferson, Arapahoe, El Paso, Pueblo, Weld, Larimer, Morgan and Eagle.

PERSONS WITH DISABILITIES

Map 6 shows the distribution of persons with disabilities in Colorado, with darker areas highlighting larger concentrations of disabled populations. Parts of El Paso, Las Animas, Conejos, Montrose and Garfield Counties have the highest concentration of population with disability by Census block.



The 2005 American Community Survey estimates that 507,000 people in Colorado have a disability, or about 12.1 percent of the population age 5 and over. As many as 81,000 people, or 1.9 percent of the population age 5 and over, have difficulty performing self-care activities.

⁶ Colorado Department of Labor and Employment 2007

Table 3

Disability Data					
SUBJECT	Population	#Persons with a Disability	Population % with a disability	# with a self-care difficulty	Population % with a self-care difficulty
STATE POPULATION	4,203,000	507,000	12.1%	81,000	1.9%
Sensory		159,000		25,000	15.9%
Mobility		294,000		72,000	24.3%
Cognitive		174,000		44,000	25.4%
Self-Care		81,000		81,000	
Leaving the Home		125,000		59,000	47.0%
Work Disability		258,000		66,000	25.7%

SOURCE: 2005 American Community Survey

Distribution of disabled persons by age group in the 2000 Census:

Table 4

AGE GROUP	% OF COLORADOANS DISABLED
5 TO 20 Years Old	7.4%
21 to 64 Years Old	15.9%
65 Years and Over	40%

According to a 2003 study completed for the Colorado Department of Human Services Supportive Housing and Homeless Programs⁷, there were an estimated 39,144 persons age 18 – 64 in Colorado receiving Supplemental Security Income (SSI) or Aid to the Needy Disabled (AND). Of these, 13,450 are already housed in affordable units. This analysis finds there are still 11,504 persons with disabilities who need affordable housing.

Another study, "Priced Out in 2006, Housing Crisis for People with Disabilities" found that the percent of Supplemental Security Income (SSI) needed to rent a one-bedroom housing unit in Colorado in 2006 was 108.5%⁸.

Many of the homeless population are also disabled: the August 2006 Statewide Homeless Count found that one in four homeless survey respondents (26.0%) indicated that they had chronic substance abuse issues. Approximately one in five reported mental illness (21.2%) and medical conditions (19.5%). Due to the stigmatizing nature of these questions, it is likely that disabling conditions were under-reported. Single persons (71%) and households without children (77%) were most likely to have at least one of five disabling conditions.

⁷ Follow-Up Study Of Housing Needs Of Low-Income Populations In Colorado, August, 2003

⁸ Technical Assistance Collaborative, Inc; Consortium for Citizens with Disabilities, Housing Task Force

PERSONS LIVING WITH HIV/AIDS

Acquired Immune Deficiency Syndrome (AIDS) is caused by the Human Immunodeficiency Virus (HIV) which attacks the immune system's ability to fight infections. According to the Colorado Department of Public Health and Environment, there were 8,845 persons with AIDS and 4,200 living with HIV in Colorado as reported through June 30, 2007.

Persons with HIV/AIDS are living longer, healthier lives due to research and treatment advances. The Colorado AIDS Project and its affiliated agencies across the state provide a range of housing and supportive services to persons living with HIV/AIDS. Affordable housing is a crucial element in helping clients and their families achieve meaningful, productive lives, however the number of housing vouchers does not meet the needs of the population. Funding from HUD and other sources such as Ryan White continues to decline.

SERIOUS MENTAL ILLNESS

Based on the 2000 Census, the Colorado Department of Human Services, Division of Mental Health estimates that as many as 168,878 adults and children in Colorado may have a serious emotional disability (SED) or serious mental illness (SMI)⁹

In 2001, the TriWEST Group performed a study for the Colorado Department of Human Services (CDHS) along with an analysis of mental health systems. They concluded that 571 additional Section 8 slots were needed 41 HUD Supportive Housing slots were needed, 49 Single Room Occupancy Modified Rehab slots, 23 homeownership slots and 133 other housing slots were needed. This represents a total of 817 beds¹⁰.

Housing Options For Senior Citizens

As Colorado's "baby boom" population ages (those born between the years 1946-1964), the need for age-appropriate housing and services that allow aging in place will increase dramatically. Areas with the highest projected increase in the population in the over-65 age group include areas of the I-70 corridor and central mountains, as well as Douglas, Elbert La Plata, San Juan and San Miguel Counties. Lincoln and Prowers counties will experience a slight decrease in the population age 65 years and older during the period. Increases in frail elderly will require new strategies to ensure that seniors are able to age in place. A 2007 study conducted for the Colorado Division by Community Strategies Institute estimated that 5,111 senior households are rent burdened.

Rehabilitation of units is an important strategy to help meet the housing needs of seniors. While there are many owner-occupied housing rehab programs,

⁹ n. d. "Population in Need of Mental Health Services and Public Agencies Service Use in Colorado" retrieved on August 29, 2007 from www.cdhs.state.co.us/dmh/de_pin_estimates_of_need.htm

¹⁰ An Assessment of Community Mental Health Resources)

there are few housing rehab programs for senior or disabled clients who rent units in need improvements that allow aging in place.

According to the Colorado Department of Health and Environment, there are three types of assisted living residences in Colorado: private pay, alternative care facilities (assisted living residences that are Medicaid certified) and residential treatment facilities for persons with severe and persistent mental illness. There are about 524 assisted living residences in Colorado (11/04). Any assisted living residence caring for 3 or more residents must be licensed.

The 2004-2007 State Plan on Aging forecasts a significant growth of Assisted Living Facilities, but a very limited number of Assisted Living that will accept Medicaid payments.

DEVELOPMENTALLY DISABLED

According to Dr. David Braddock, Ph.D., Executive Director of the Coleman Institute for Cognitive Disabilities at the University of Colorado, in testimony to the Colorado Senate House Interim Committee on Developmental Disabilities (DD) on July 18, 2007, "An estimated 9,000 families in Colorado aged 60+ care for family members with dd and over 3,000 persons with id/dd are on waiting lists."

The U.S. Government Accountability Office (GAO) issued a report to Congress entitled "Public Housing - Distressed Conditions in Developments for the Elderly and Persons with Disabilities and Strategies Used for Improvement." (GAO-06-163, 12/05) in which they found 64 out of 76 housing projects included in their national study had fewer than five percent of the units that met the accessibility standards for persons with mobility disabilities.

David Bolin, Executive Director of Center for People with Disabilities (CPWD), reports that there are a significant number of persons with developmental disabilities that want to leave nursing homes who are unable to do so without supportive funding for housing and services.

V. HOMELESSNESS

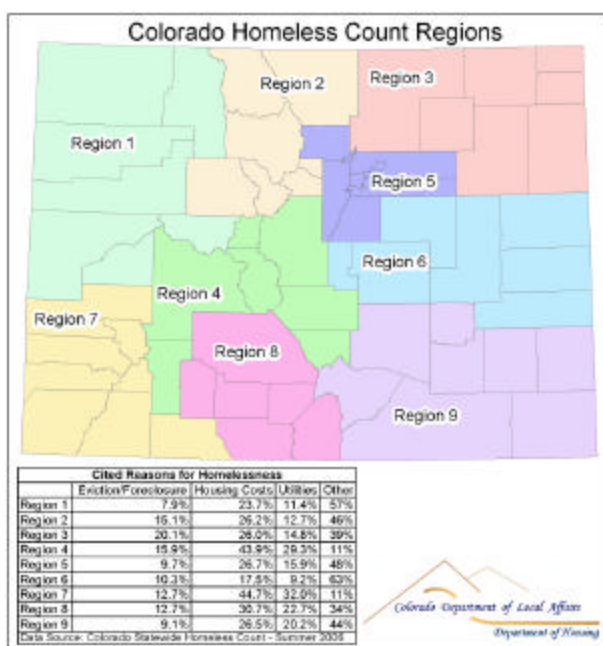
CDOH conducted an August 2006 statewide homeless count to acquire baseline information about the number of persons without a safe, regular and fixed place to live. The process determined that as many as 16,203 persons were homeless on the night of the count, and nearly two-thirds (62.1%) of all homeless persons in Colorado were in households with children. Homeless persons are included in this Fair Housing assessment since minorities are over-represented in the homeless population, and housing supply for very-low income populations is an impediment.

Compared to the general population in Colorado 2005, minorities were over-represented and whites were underrepresented among Colorado's homeless.

Homeless persons ranged in age from less than one year to 98 years old. Half (51.2%) of all homeless persons were adults age 25-64. There were a total 3,643 homeless children and teens; they comprised one-third (34.0%) of all people who were homeless on Monday, night, August 28, 2006.

Almost six in 10 (56.7%) respondents were male and four out of 10 (43.3%) were female. Single individuals were predominantly male, while most single parent households were headed by females. Compared to the general population in Colorado in 2005, minorities were over-represented and whites were underrepresented among Colorado's homeless.

The state was divided into nine regions for purposes of the statewide enumeration. These regions allowed researchers to better understand homelessness and its causes. Shown below is a map of regions and the housing related reasons that contributed to homelessness.



VI. HOUSEHOLD COMPOSITION

Most households in Colorado with children have two adults in the households¹¹. Still, 15% of households with children have only one adult at home. These households often have the lowest incomes. The majority of households in Colorado -67%- do not have children living in the household. This percent has not changed in the past five years. There are 974,348 children age 14 and under in the state, an average of 1.63 children per household with children. The number of children per household with children

¹¹ Center for Business and Economic Forecasting 2005

has decreased slightly over the past five years, while the number of children has rose by almost 74,000.

Table 5

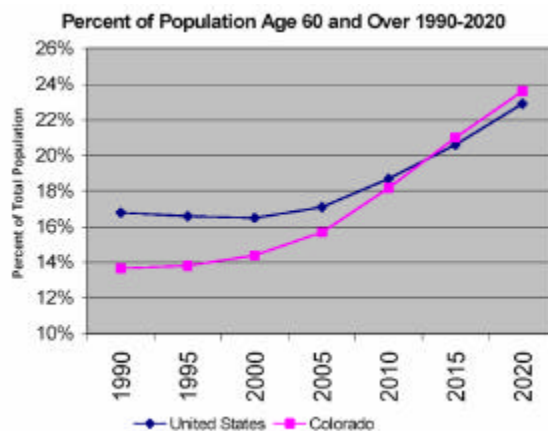
Colorado Household Composition, 2005			
Household Type	Number of Households	Percent of Renters	Percent of Owners
All Households	1,815,150	29%	71%
More Than One Adult with Children	510,356	31%	69%
More Than One Adult without Children	738,183	26%	74%
One Adult with Children	89,030	36%	64%
One Adult without Children	477,581	28%	72%
Householder Age 18 - 24	117,635	80%	20%
Householder Age 25 - 44	760,640	34%	66%
Householder Age 45 - 64	646,934	17%	83%
Householder Age 65 and Older	289,940	18%	82%

SOURCE: Center for Business and Economic Forecasting

AGE

In 1990 Census, the median age was 27.8 years old, while ten years later the median age was 28.2%. According to the Colorado Department of Human Services, Division of Adult and Aging Services, Colorado will exceed the national percentage of growth in the population age 60 and over in 2011 due to the number of "Baby Boomers who came to Colorado in their twenties and thirties and remained here. See Figure 2.

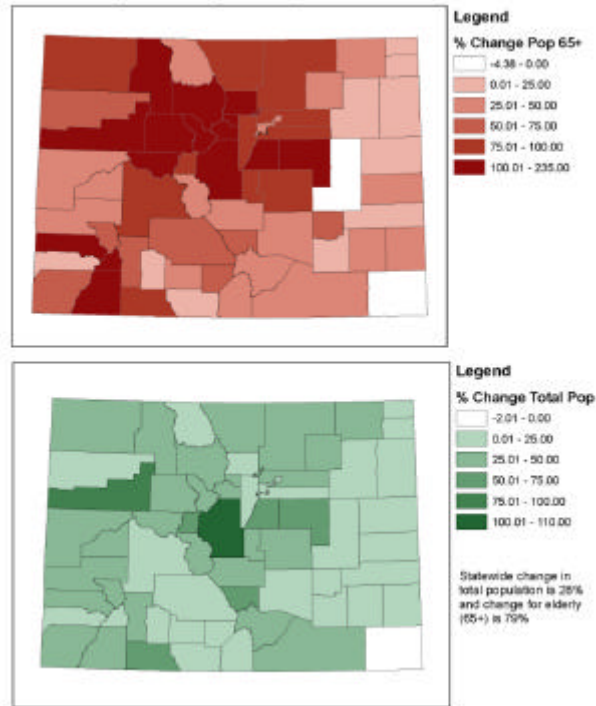
Figure 2



SOURCE: State Plan on Aging 2004-2007, Department of Human Services, Adult and Aging Services

Map 7

Percentage Change in Population from 2007 to 2020



SOURCE: State Demographer, 2007

Gender

In 2000, 49.6 % of the Colorado population was female, while males comprised 50.4%.

Education

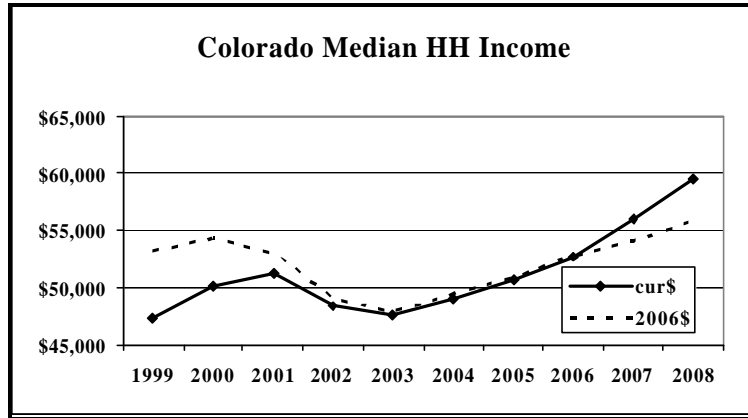
The 2005 American Community Survey found 89% of the population 25 years and over in Colorado is a high school graduate (includes equivalency). In the same age group, non-graduates comprise 11% of the population.

VII. COLORADO INCOMES AND ECONOMICS

According to economist, Bill Kendell, Colorado experienced strong growth through the 1990's but slowed after 2000. The downturn of the Colorado economy depressed incomes of Colorado households (Figure 3).

Real median household income for the state has yet to recover to its pre-recession peak. The state median household income in 2000 was \$54,336 in today's dollars; in 2006 the median was just under \$53,000. During the period between 1994 and 2000, it increased by more than \$8,000. Gains over the period of 2005-08 are expected to be slightly above the rate of inflation.

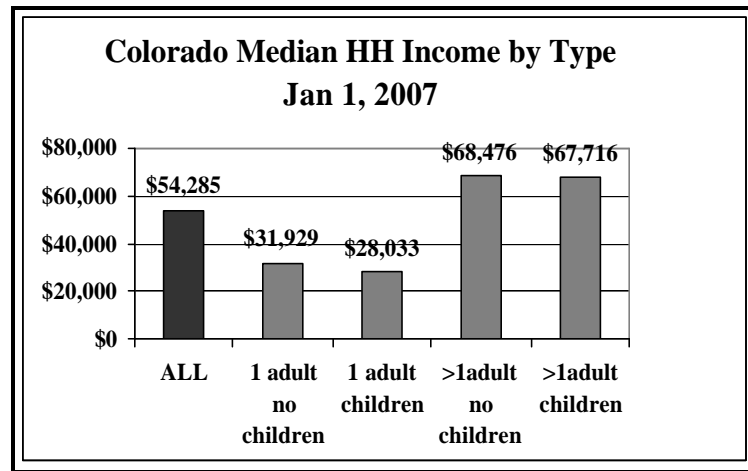
Figure 3



SOURCE: Center for Business and Economic Forecasting, 2007

In Figure 4, Kendall compares January 1, 2007 median incomes for different categories of households. Households with more than one adult, principally those headed by married couples, show much higher incomes than those with only one adult. The one-adult-without-children households, containing large numbers of older persons as well as young persons living alone, show somewhat higher incomes than households with one adult and children. The latter category which, is largely made up of single mothers and their children, has the lowest median income of any household type.

Figure 4

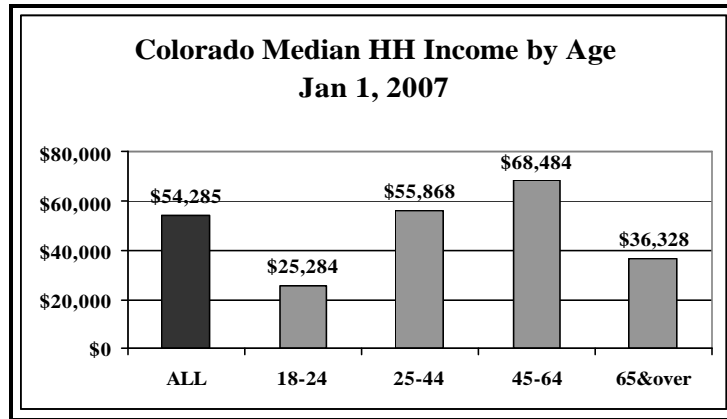


SOURCE: Center for Business and Economic Forecasting, 2007

Figure 5 shows median income by age of householder on January 1, 2007. Households with the householder in prime working years (25-64) are estimated to have much higher incomes than those with persons either just entering the work force (18-24) or predominately retired (65 and over) ¹².

Figure 5

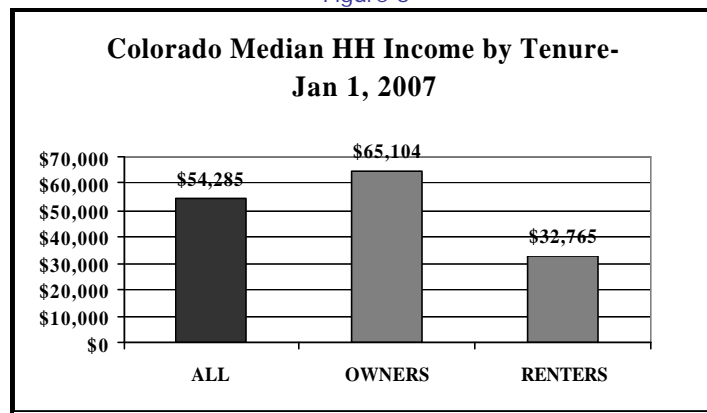
¹² Center for Business and Economic Forecasting 2005



SOURCE: Center for Business and Economic Forecasting, 2007

The median income of renters is roughly half that of home owners (Figure 6). Lower income in today's rental housing markets means less flexibility to cope with housing prices. Renter households are more likely to be smaller than those who are home owners. Renters are evenly distributed through the income ranges while homeowners are concentrated at higher income levels.

Figure 6



SOURCE: Center for Business and Economic Forecasting, 2007

Shown below are unemployment rates from 1996-2006 from the Colorado Department of Labor and Employment. Unemployment rates surged after 9/11 but have demonstrated a steady recovery since.

Table 6

Labor Force Statistics for Colorado				
Year	Labor Force	Employment	Unemployment	Unemployment Rate
1996	2,093,184.00	2,004,741.00	88,443.00	4.20
1997	2,150,160.00	2,080,012.00	70,148.00	3.30
1998	2,241,839.00	2,155,740.00	86,099.00	3.85
1999	2,264,105.00	2,198,147.00	65,958.00	2.90
2000	2,364,900.00	2,300,192.00	64,798.00	2.70
2001	2,395,264.00	2,303,494.00	91,770.00	3.80
2002	2,431,203.00	2,293,229.00	137,974.00	5.70
2003	2,463,161.00	2,311,998.00	151,163.00	6.10
2004	2,510,392.00	2,370,803.00	139,589.00	5.60
2005	2,547,895.00	2,419,241.00	128,654.00	5.00
2006	2,651,718.00	2,537,037.00	114,681.00	4.30

Colorado Department of Labor and Employment

Persons who are unemployed may receive services, apply for unemployment benefits and/or conduct a job search at local workforce center (see map 8).

Map 8



VIII. TRANSPORTATION

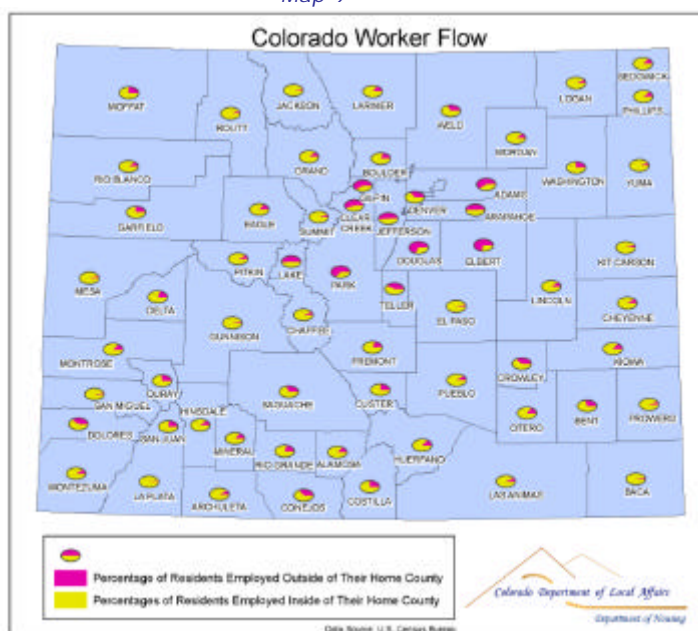
Public transportation plays an important role in enhancing the ability to find appropriate housing. Recent studies demonstrate the need to include mixed-use development along transportation routes. This is known as Transit Oriented Development (TOD). TOD ensures that low-income and disabled families are able to reach employment and hold down their transportation costs. The Center for Housing Policy, in their October 2006 study, found that low-income residents of the Denver Metropolitan Statistical Area (MSA) with earnings between \$20,000 and \$50,000 are spending twenty-nine percent of their incomes for transportation.¹³ When aggregated with housing costs, this takes up to nearly fifty-nine percent of their income. “Although housing costs tend to fall as a household moves further from employment centers, transportation costs generally raise as distance increases. At some distance, generally 12 to 15 miles, the increase in transportation costs outweighs the savings on housing – and the share of household income required to meet these combined expenditures rise.”

In 2002, the U.S. Department of Transportation and the U.S. Census Bureau began a process to combine labor statistics and commuter “shed” data for each state in order to provide a better representation of commuting patterns of workers getting to and from employment. This report contains a Geographic Information System (GIS) map of the information on the county level.

¹³ A Heavy Load: The Combined Housing and Transportation Burdens of Working Families, The Center for Housing Policy, 2007

The “pie” graphic for each county on Map 9 shows that commuting is commonplace in Colorado. The portions of the pie shape displayed in the darker shade (red) are counties with a significant number of persons employed outside of their home county. Driving long distances to work places increased stress on the ability of low-income and minority households to find appropriate housing.

Map 9

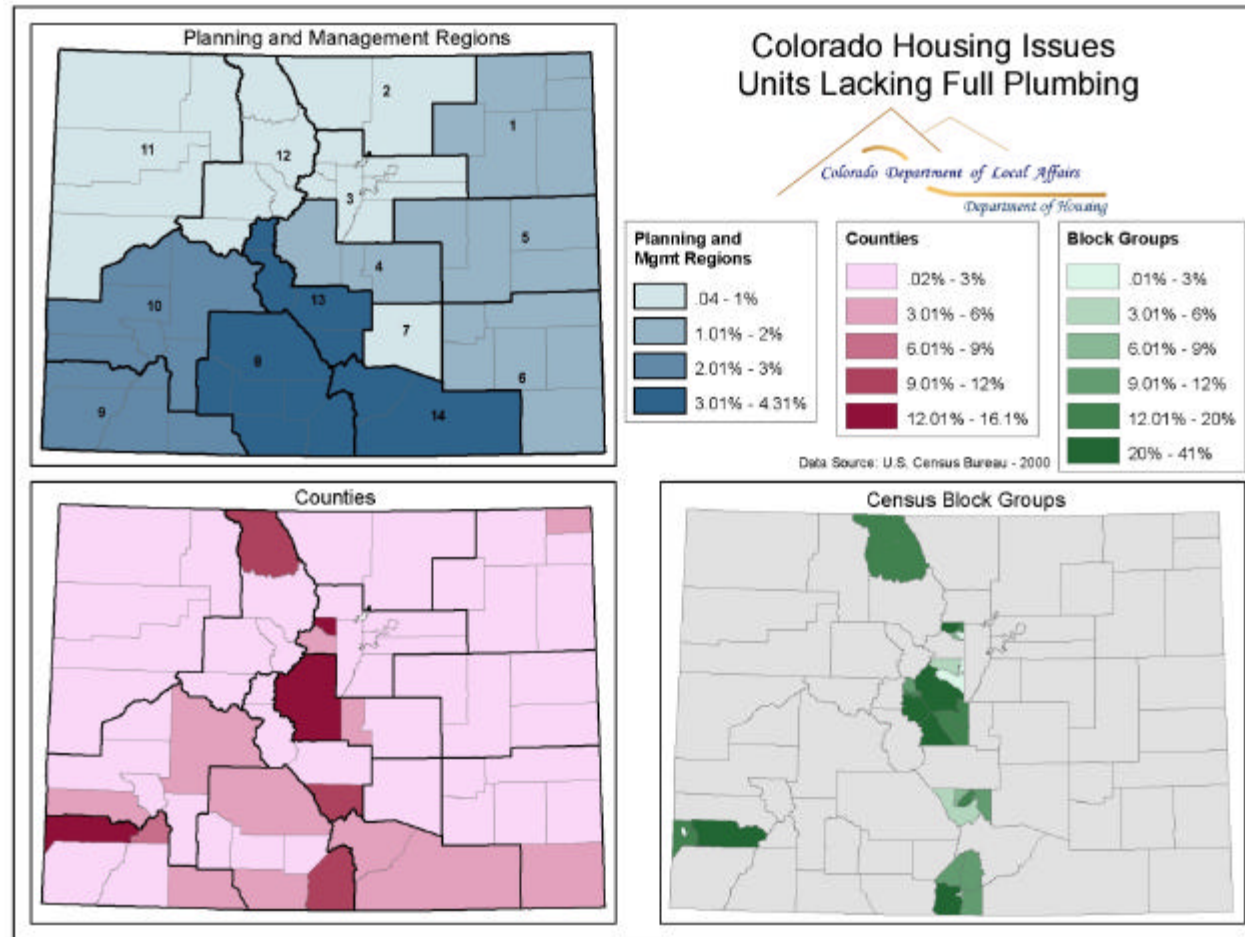


IX. HOUSING UNITS IN COLORADO

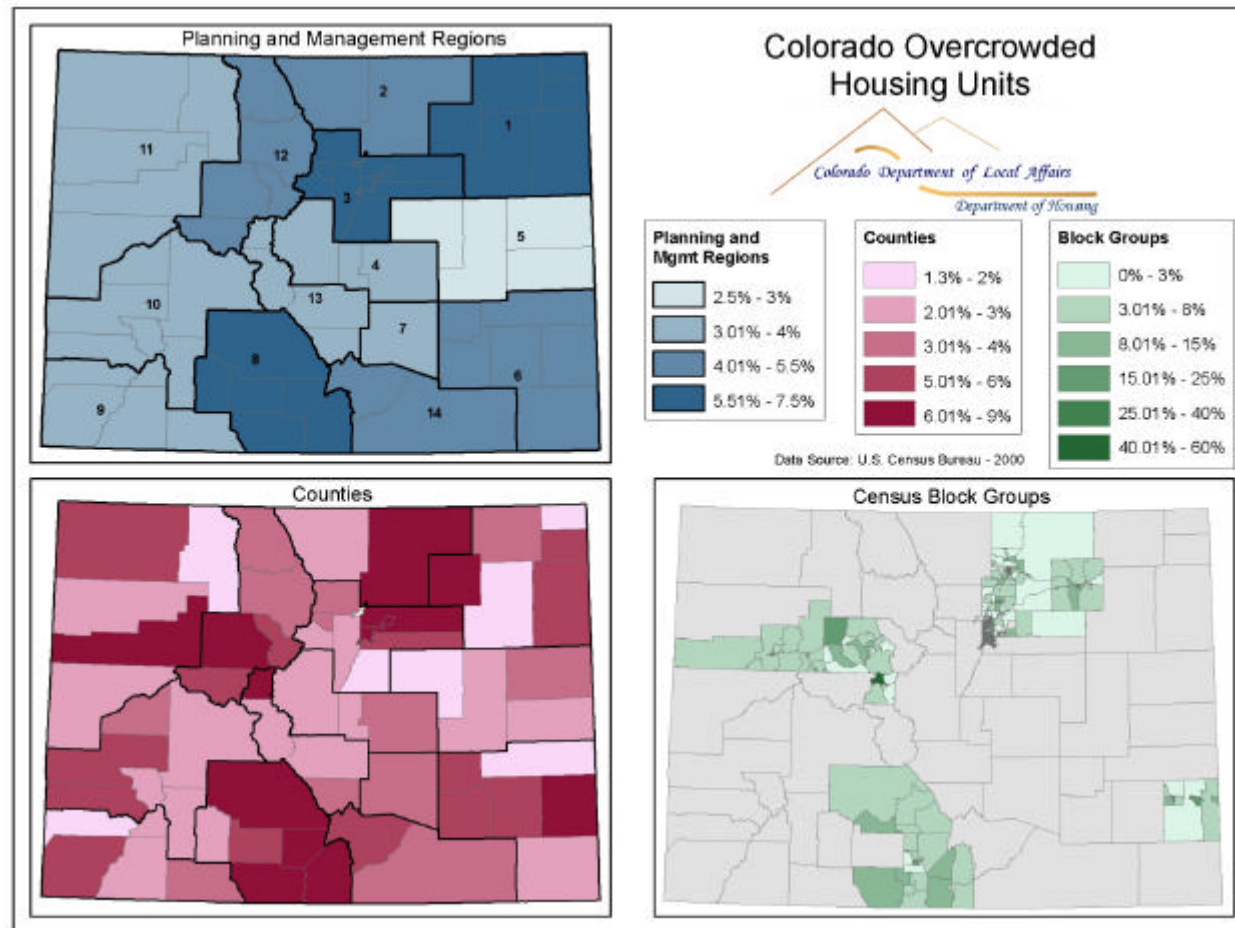
HOUSING CONDITIONS

Maps below detail the housing conditions as described in the 2000 Census at the regional, county and Census tract level. Costilla and Custer Counties show the greatest percentage of units without full kitchens. Costilla, Custer, Gilpin and Dolores Counties have a higher incidence of units without full plumbing, and overcrowding is most prevalent in Adams, Conejos, Denver, Eagle, Garfield, Lake, Morgan, Prowers, Saguache, and Weld Counties.

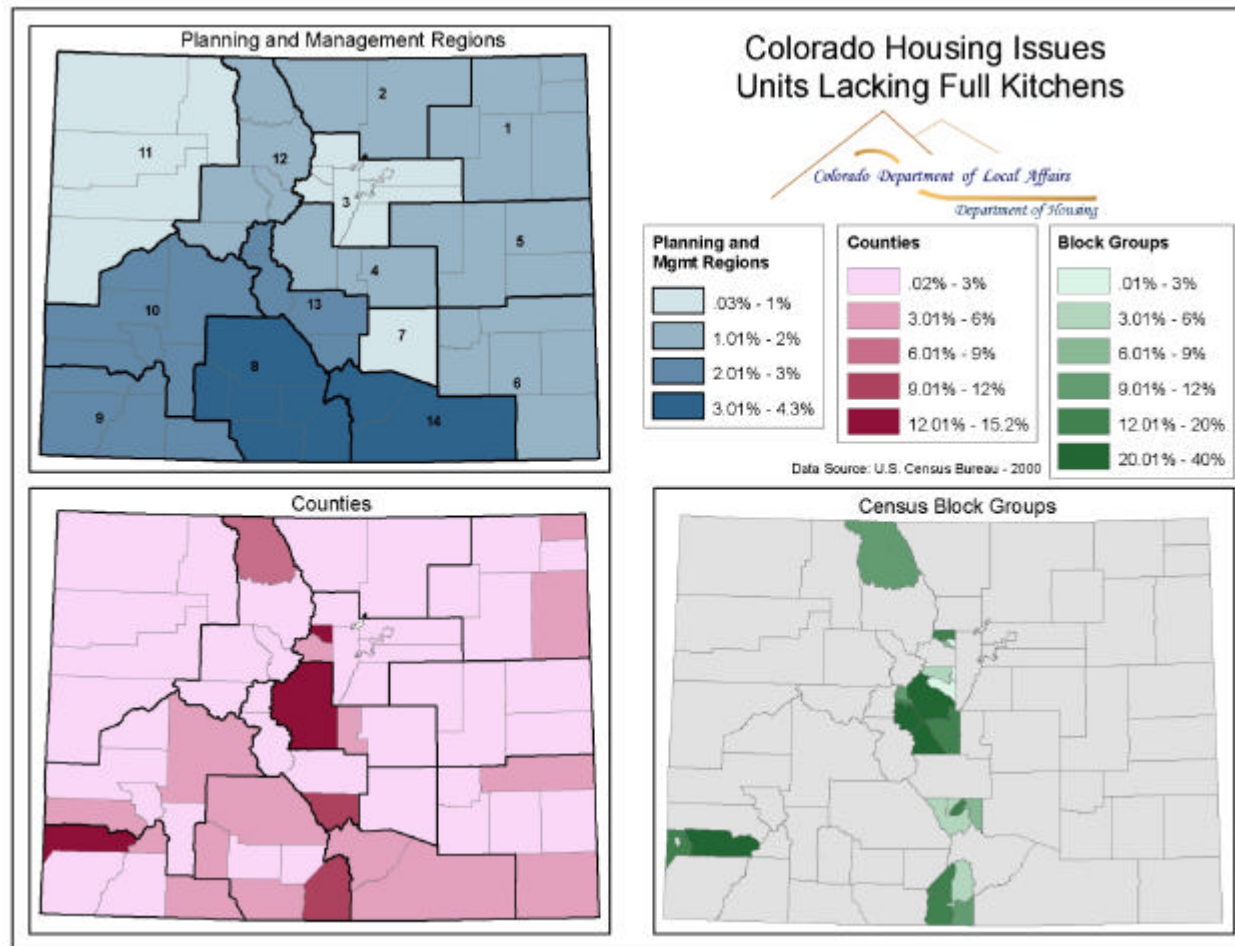
Map 10



Map 11



Map 12



RENTAL HOUSING

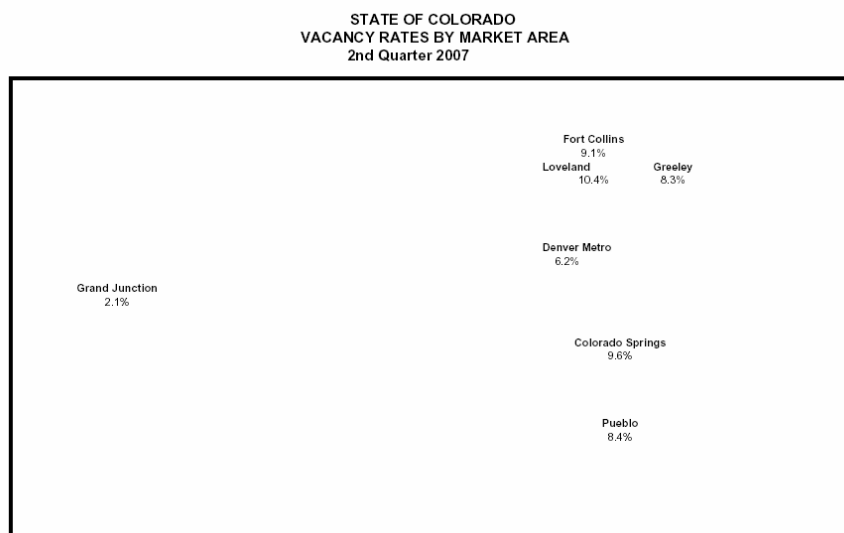
For low-income Coloradans, the quality and viability of rental housing is of great importance. A recent study by Community Strategies Institute for the Colorado Division of Housing shows that there is great need among low-income renters in Colorado. The study indicates that renter median income in Colorado is roughly half of the overall median income (including homeowners) in Colorado. The 2007 renter median income was \$32,765, while the *overall* median income was \$65, 400. The need for housing is greatest among the lowest income of renters.

VACANCY RATES

Vacancy rates in Colorado have greatly improved over the last two to three years, however some markets have tightened up too much and are unaffordable. This is particularly true in resort areas and in the Grand Junction and Rifle areas of northwest Colorado that are experiencing an energy boom and a shortage of housing supply. A market is said to be in equilibrium when it achieves a five percent vacancy rate. The vacancy rate of Grand Junction in the second quarter of 2007 was 2.1%. A tight market drives up the cost of rental units.

When we segment the market by income, i.e. renters earning 30% or less of the Area Median Income (AMI), less than 40% AMI less than 50% AMI, or less than 60% AMI, the housing market is tightest for the group of renters who make less than 30% AMI. This group often includes seniors, persons with disabilities, or persons newly working.

Figure 7



RENTAL HOUSING COST BURDEN

According to HUD programs, households spending more than 30 percent of income for these housing costs are considered to be "cost-burdened." Households spending more than 50 percent are considered to be "severely cost-burdened." Housing is generally considered to be affordable if the household pays 30 percent or less of their income on rent.

It is useful to compare 2000 Census cost-burden data with 2005 information captured by the American Community Survey. A note of caution: while both are products of the Census Bureau, there are differences in methodology. The chart below presents very basic data and does not combine data or attempt to calculate a percentage of change. It appears, however, that cost-burdened households have increased, confirming the most oft-repeated message of key informant surveys, interviews, and consultations: there is an inadequate supply of affordable housing that makes it especially difficult for low-income, minority and special populations to thrive in the State of Colorado.

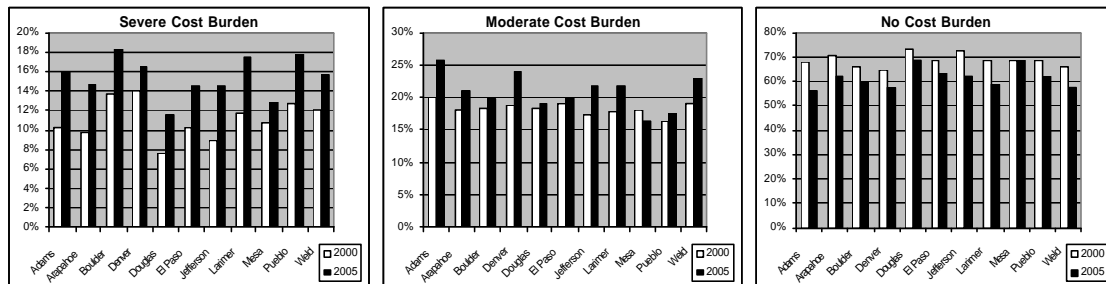
Table 7 demonstrates cost-burden for renters vs. owners. In Adams County, 7% of owners were severely cost-burdened in 2000; by 2005, 14% of owners were severely cost-burdened --an increase of 6.7%. For Adams County, severely cost-burdened households increased by 4 % for the same period.

Table 7

Cost Burden by Tenure and Year												
County	Owners						Renters					
	Severe		Moderate		No Burden		Severe		Moderate		No Burden	
	2000	2005	2000	2005	2000	2005	2000	2005	2000	2005	2000	2005
Adams	7.3%	14.0%	19.1%	24.0%	73.1%	61.5%	16.1%	20.1%	22.2%	29.5%	57.8%	45.6%
Arapahoe	6.4%	10.6%	16.2%	21.9%	77.1%	66.8%	15.9%	23.6%	21.8%	19.2%	59.1%	52.0%
Boulder	7.9%	8.9%	15.6%	18.3%	76.1%	72.2%	22.8%	35.8%	22.8%	22.5%	50.2%	37.2%
Denver	9.3%	14.1%	17.1%	20.1%	73.0%	65.2%	18.3%	19.2%	20.3%	28.5%	57.2%	47.8%
Douglas	6.7%	8.6%	17.8%	18.7%	75.3%	72.6%	13.7%	24.7%	22.3%	19.9%	59.4%	52.7%
El Paso	6.9%	11.2%	16.5%	18.5%	76.2%	70.0%	15.5%	20.9%	22.9%	23.1%	56.1%	50.8%
Jefferson	6.0%	11.3%	15.4%	19.9%	78.2%	68.5%	15.6%	23.8%	22.0%	27.2%	59.2%	44.1%
Larimer	6.6%	11.2%	15.6%	21.9%	77.4%	66.5%	20.5%	31.0%	21.5%	21.5%	53.6%	41.8%
Mesa	7.2%	7.8%	15.2%	15.2%	76.8%	76.7%	18.3%	24.8%	23.9%	19.1%	51.9%	49.6%
Pueblo	8.4%	12.8%	13.8%	15.7%	77.1%	70.3%	21.8%	28.2%	21.3%	21.5%	50.6%	43.7%
Weld	7.9%	13.3%	18.6%	22.3%	73.0%	63.6%	19.4%	22.2%	20.0%	25.1%	52.9%	41.5%

Data Source: U.S. Census Bureau, 2000 – SF3 H69 & SF3 H94, 2005 – ACS B25091 & B25070

Figure 8



Data Source: U.S. Census Bureau, 2000 – SF3 H69 & SF3 H94, 2005 – ACS B25091 & B25070

Which leads to another question?

“WHAT IS AFFORDABLE HOUSING IN YOUR AREA?”

The Colorado Division of Housing produces a document, “What Is ‘Affordable Housing’ in Your Area?”, using HUD’s Area Median Income, Multi-family Housing and Rental Vacancy Survey from the Division of Housing and Metro Apartment Association. The rental portion of this 2007 chart is broken out separately for this presentation to help illustrate the differences in rental costs across the state.

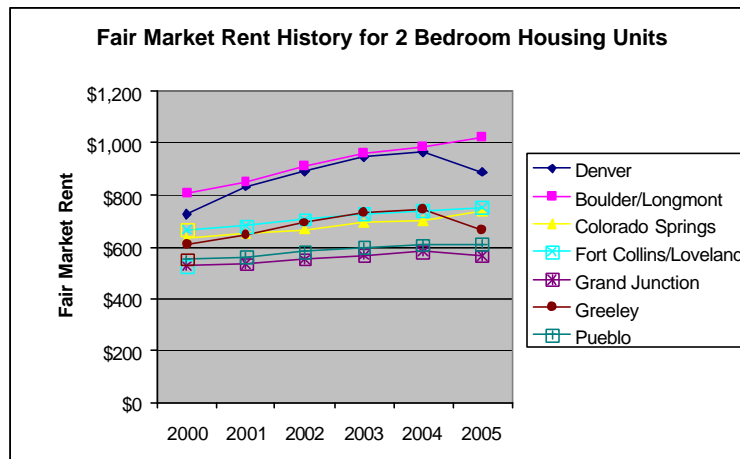
Table 8

County	30% of AMI for 3-Person Family	Affordable Rent Payment	Median Rent 9/06 for 2br/1ba
Adams	19350	484	722
Alamosa	14550	364	409
Arapahoe	19350	484	743
Archuleta	14550	364	NA
Bent	14550	364	NA
Boulder	23500	588	955
Broomfield	19350	484	673
Chaffee	14550	364	585 Buena Vista 412 Salida
Cheyenne	14550	364	NA
Clear Creek	19350	484	NA
Conejos	14550	364	NA
Costilla	14550	364	NA
Custer	14550	364	NA
Delta	14550	364	NA
Denver	19350	484	838
Dolores	14550	364	NA
Douglas	19350	484	1003
Eagle	21600	540	798
Elbert	19350	484	NA
El Paso	17100	428	614
Garfield	17050	425	742 Glenwood Spgs.
Gilpin	19350	484	NA
Grand	17600	440	NA
Gunnison	16550	414	
Hinsdale	14650	366	NA
Huerfano	14550	364	NA
Jackson	14550	364	NA
Jefferson	19350	484	741
Kit Carson	14550	364	NA

Lake	14650	366	521
La Plata	16050	401	802 Durango
Larimer	18700	468	687 Fort Collins/ Loveland
Las Animas	14550	364	NA
Lincoln	14550	364	NA
Logan	14550	364	389 Fort Morgan/ Sterling
Mesa	14550	364	653
Moffatt	14550	364	NA
Montezuma	14550	364	NA
Montrose	14550	364	526 Montrose
Morgan	14550	364	389 Fort Morgan/ Brush
Otero	14550	364	NA
Ouray	16300	408	NA
Park	19350	484	NA
Phillips	14550	364	NA
Powers	14550	364	NA
Pueblo	14550	364	489
Rio Blanco	14550	364	NA
Rio Grande	14550	364	NA
Routt	19650	364	
Saguache	14550	364	NA
San Juan	14550	364	NA
San Miguel	19250	481	NA
Summit	21150	529	887
Teller	18150	454	NA
Washington	14550	364	NA
Weld	15750	394	609 Greeley
Yuma	14550	364	NA

We also examined the trend of HUD Fair Market Rents over the 5-year period of 2000-2005. These rents continued to climb in Boulder/Longmont, Fort Collins/Loveland, Pueblo and Colorado Springs areas, while decreasing in Denver, Grand Junction and Greeley.

Figure 9



Source www.huduser.org/datasets/fmr. Retrieved on 6/21/07.
Note: FMR based on 40th percentile rent.

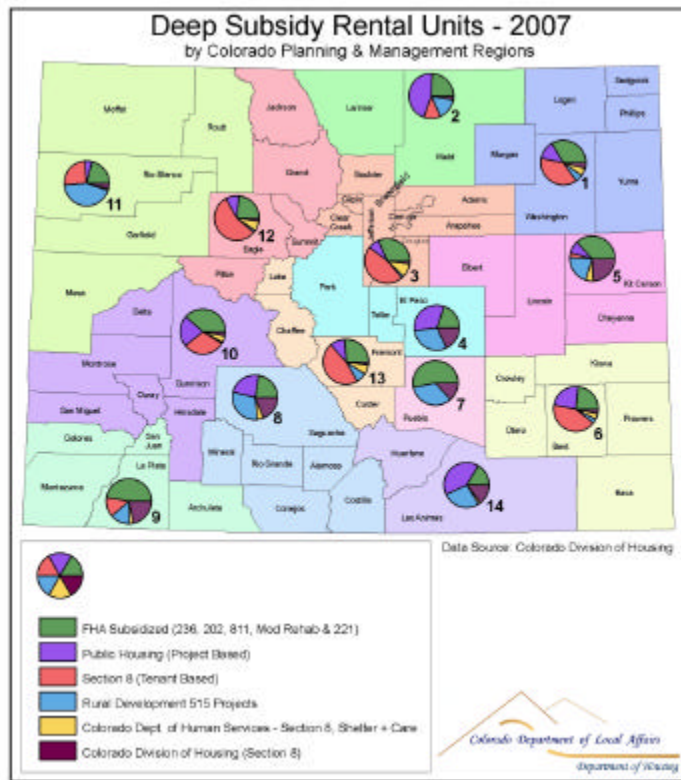
Recent credit-tightening in the for-sale housing market may result in households remaining as renters rather than moving into homeownership.

PUBLIC HOUSING

Deep Subsidy Units

The term "deep subsidy" refers to rental housing for households at 50% of HUD's median income where the renter is responsible for paying 30% of their income for housing expenses. The remaining rent and utilities are paid for either by HUD or the U.S. Dept. of Agriculture Rural Development (RD). The total of all units across the state is shown below and represented geographically by region.

Map 13



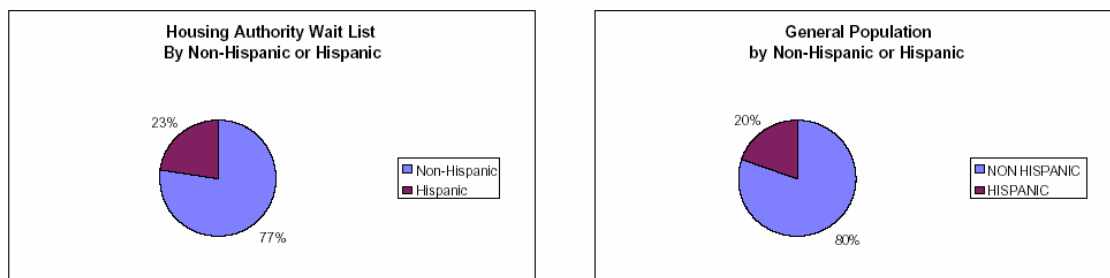
FHA Subsidized with Section 8	
rent assistance (236, 202 & 221)	18,543
Public Housing (Project Based)	7,974
Section 8 (Tenant Based)	20,723
Rural Development 515 Projects	3,080
Dept. of Health and Human Services -	
Sec8 Shelter + Care	3,076
Colorado Division of Housing - Sec8	2,453
TOTAL	55,849

Housing Authorities

Many housing authorities prioritize local preferences for elderly, homeless and persons with disabilities for Section 8 housing vouchers. Other priorities include head of household, employment or attending school on a full-time basis.

CDOH conducted a survey of the waiting lists of Public Housing Authorities in January 2005. Hispanics comprise 20% of the general population, and we would expect to see a similar ratio for housing authority waiting lists. Instead, 23% of those on waiting lists for Section 8 are Hispanic – a higher percentage than Hispanics in the general population during the same year.

Figure 10



SOURCE: Colorado Division of Housing Survey 2005

SOURCE: American Community Survey 2005

The survey also records 1,532 elderly persons with disabilities and 7,905 families with disabilities on waiting lists in 2005.

HOUSING UNITS BY TENURE

Housing units by Tenure (Rental or Owner status) for 2000 is provided below. Although updated information for the number of total residences is available, no breakdown of unit configuration or owner status is available at this time.

Table 9

Housing Units in Colorado, 2000					
	Number of Units 2000	Rentals		Owners	
		Units	Percent	Units	Percent
Total Residences	1,658,238				
Single Family Detached	1,048,560	135,259	12.9%	913,301	87.1%
Apartments/ Multifamily	411,460	351,650	85.5%	59,818	14.5%
Single Family Attached	104,920	34,626	33.0%	70,294	67.0%
Mobile Homes	91,609	20,062	21.9%	71,547	78.1%
Boat, RV, Van	1,681	336	20%	1,345	80%

Census 2000 Summary File 3 (SF3), Tenure by Units in Structure

HOMEOWNERSHIP

HOME PURCHASE

Recent declines in profitability and increased requirements by regulators in the sub-prime mortgage lending markets indicate that many home finance tools once popular among first-time home buyers (former renters) are not as popular as they once were. The result is that many renters who might have moved into homeownership in recent years may be electing to remain as renters for the time being. Higher home prices may force prospective buyers to have larger down payments, choose less expensive homes, or increase the amount they borrow.

The Colorado Division of Housing produces, “What Is ‘Affordable Housing’ in Your Area?” to view the ability of a household to buy a single family home/condo, and it includes the Median Sales Price by County and the number of units available to households at less than 80% AMI and less than 60% AMI.

Table 10

What Is “Affordable Housing” In Your Area?

County	3-Person AMI	Affordable Payment	Affordable Sales Price 6.25%	Median Sales Price Year End 2006	Benchmark 1,300 sq.ft. Home Value	# units Available <80% AMI	# units Available <60% AMI
Adams	<80% AMI \$51600 <60% AMI \$38,700	\$1,290 \$968	\$179,993 \$134,995	\$194,000 sf \$138,000 co	\$177,810	568 sf 260	245 sf 276 co
Alamosa	<80% AMI \$38,800 <60% AMI \$29,100	\$970 \$728	\$135,344 \$101,508	\$130,000 sf \$196,660 co	\$101,535	10 sf 0 co	11 sf 0 co
Arapahoe	<80% AMI \$51600 <60% AMI \$38,700	\$1,290 \$968	\$179,993 \$134,995	\$234,000 sf \$140,000 co	\$185,370	564 sf 480	311 sf 806 co
Archuleta	<80% AMI \$38,800 <60% AMI \$29,100	\$970 \$728	\$135,344 \$101,508	\$268,643 sf \$275,000 co	\$137,500	8 sf 5 co	16 sf 1 co
Bent	<80% AMI \$38,800 <60% AMI \$29,100	\$970 \$728	\$135,344 \$101,508	NA sf NA co	\$55,859	4 sf 0 co	38 sf 2 co
Boulder	<80% AMI \$53650 <60% AMI \$46,980	\$1,341 \$1,175	\$187,144 \$163,877	\$370,288 sf \$211,485	\$247,355	4 sf 12 co	4 sf 26 co
Broomfield	<80% AMI \$51,600 <60% AMI \$38,700	\$1,290 \$968	\$179,993 \$134,995	\$272,000 sf \$202,992	\$199,831	14 sf 37 co	1 sf 10 co
Chaffee	<80% AMI \$38,800 <60% AMI \$29,100	\$970 \$728	\$135,344 \$101,508	\$268,643 sf \$275,000 co	\$202,548	10sf 0 co	13 sf 0 co
Cheyenne	<80% AMI \$38,800 <60% AMI \$29,100	\$970 \$728	\$135,344 \$101,508	NA sf NA co	\$38,065 2004 data	NA sf NA co	NA sf NA co
Clear Creek	<80% AMI \$51,600 <60% AMI \$38,700	\$1,290 \$968	\$179,999 \$134,995	NA sf NA co	\$206,796	16 sf 0 co	4 sf 0 co
Conejos	<80% AMI \$38,800 <60% AMI \$29,100	\$970 \$728	\$135,344 \$101,508	\$109,198 sf \$59,000 co	\$58,090 2004 data	7 sf NA co	4 sf NA co
Costilla	<80% AMI \$38,800 <60% AMI \$29,100	\$970 \$728	\$135,344 \$101,508	\$101,640 sf NA co	\$61,905 2004 data	6 sf NA co	4 sf NA co
Custer	<80% AMI \$38,800 <60% AMI \$29,100	\$970 \$728	\$135,344 \$101,508	\$171,250 sf NA co	\$130,331	31 sf 1 co	20sf 1 co
Delta	<80% AMI \$38,800 <60% AMI \$29,100	\$970 \$728	\$135,344 \$101,508	\$268,643 sf \$275,000 co	\$137,500	8 sf 5 co	16 sf 0 co
Denver	<80% AMI \$51600 <60% AMI \$38,700	\$1,290 \$968	\$179,993 \$134,995	\$235,000 sf \$177,937 co	\$239,454	912 sf 338 co	502 sf 670 co
Dolores	<80% AMI \$38,800 <60% AMI \$29,100	\$970 \$728	\$135,344 \$101,508	\$168,333 sf NA co Cortez Area	\$44,185 sf 2004 data	4sf 0 co	4 sf 0 co
Douglas	<80% AMI \$51,600 <60% AMI \$38,700	\$1,290 \$968	\$179,993 \$134,995	\$317,500 sf \$193,000	\$191,873	13 sf 107 co	3 sf 57 co
Eagle	<80% AMI \$53,650 <60% AMI \$43,200	\$1,341 \$1,080	\$187,144 \$150,692	\$488,250 All property	\$352,723	0 sf 0 co	0 sf 2 co
Elbert	<80% AMI \$51600 <60% AMI \$38,700	\$1,290 \$968	\$179,993 \$134,995	NA sf NA co	\$247,433	19 sf 0 co	9 sf 0 co
El Paso	<80% AMI \$45,650 <60% AMI \$34,260	\$1,141 \$857	\$159,238 \$119,507	\$216,878 sf \$147,817 co	\$169,875	473 sf 182 co	125 sf 229 co
Garfield	<80% AMI \$45,500 <60% AMI \$34,140	\$1,138 \$854	\$158,715 \$119,088	\$282,799 sf \$227,778 co Glenwood	\$206,987	3 sf 19 co	16 sf 1 co
Gilpin	<80% AMI \$51600 <60% AMI \$38,700	\$1,290 \$968	\$179,993 \$134,995	NA sf NA co	\$200,987	8 sf 0 co	3 sf 0 co
Grand	<80% AMI \$46,900 <60% AMI \$35,160	41,173 \$879	\$163,598 \$122,646	\$381,250 sf 252,083 co	\$276,700	10 sf 17 co	4 sf 12 co
Gunnison	<80% AMI \$44,150	\$1,104	\$154,006	\$345,833 sf	\$200,757	3 sf	1 sf

	<60% AMI	\$33,120	\$828	\$115,530	\$350,000 co		7 co	2 co
Hinsdale	<80% AMI	\$39,100	\$978	\$136,339	NA sf	\$184,024	1 sf	1 sf
	<60% AMI	\$29,340	\$734	\$102,345	NA co		0 co	0 co
Huerfano	<80% AMI	\$38,800	\$970	\$135,344	NA sf	\$95,805	0 sf	1 sf
	<60% AMI	\$29,100	\$728	\$101,508	NA co		0 co	0 co
Jackson	<80% AMI	\$38,800	\$970	\$135,344	NA sf	\$80,042 sf	3 sf	0 sf
	<60% AMI	\$29,100	\$728	\$101,508	NA co	2004 data	0 co	0 co
Jefferson	<80% AMI	\$51,600	\$1,290	\$179,993	\$265,000	\$200,524	193 sf	21 sf
	<60% AMI	\$38,700	\$968	\$134,995	\$152,000		350 co	423 co
Kit Carson	<80% AMI	\$38,800	\$970	\$135,344	NA sf	\$60,849 sf	8sf	8 sf
	<60% AMI	\$29,100	\$728	\$101,508	NA co	2004 data	0 co	0 co
Lake	<80% AMI	\$39,100	\$978	\$136,390	NA sf	\$144,222 sf	3 sf	8 sf
	<60% AMI	\$29,340	\$734	\$102,345	NA co		0 co	2 co
La Plata	<80% AMI	\$42,750	\$1,069	\$149,122	\$356,889 sf	\$230,395	4 sf	7 sf
	<60% AMI	\$32,100	\$803	\$111,972	\$283,333 co Durango		6 co	1 co
Larimer	<80% AMI	\$49,800	\$1,245	\$173,714	\$233,471 sf	\$191,095	236 sf	59 sf
	<60% AMI	\$37,380	\$935	\$155,278 co	\$155,278 co		263 co	136 co
Las Animas	<80% AMI	\$39,100	\$978	\$136,390	NA sf	\$101,274 sf	11 sf	30 sf
	<60% AMI	\$29,340	\$734	\$102,345	NA co	2004 data	NA co	NA co
Lincoln	<80% AMI	\$38,800	\$970	\$135,344	NA sf	\$84,852 sf	0 sf	3 sf
	<60% AMI	\$29,100	\$728	\$101,508	NA co		0 co	0 co
Logan	<80% AMI	\$38,800	\$970	\$135,344	\$81,250 sf	\$95,928 sf	14 sf	58 sf
	<60% AMI	\$29,100	\$728	\$101,508	NA co		2 co	0 co
Mesa	<80% AMI	\$38,800	\$970	\$135,344	\$188,678 sf	\$150,525	35 sf	41 sf
	<60% AMI	\$29,100	\$728	\$101,508	NA co		20 co	3 co
Moffatt	<80% AMI	\$38,800	\$970	\$135,344	\$165,000 sf	\$125,000 sf	17 sf	14 sf
	<60% AMI	\$29,100	\$728	\$101,508	\$95,000 co Craig		NA co	NA co
Montezuma	<80% AMI	\$38,800	\$970	\$135,344	\$168,333 sf	\$133,361 sf	10 sf	3 sf
	<60% AMI	\$29,100	\$728	\$101,508	NA co Cortez Area	2004 data	0 co	1 co
Montrose	<80% AMI	\$38,800	\$970	\$135,344	\$205,208 sf	\$150,488	19 sf	22 sf
	<60% AMI	\$29,100	\$728	\$101,508	\$170,000 co		2 co	1 co
Morgan	<80% AMI	\$38,800	\$970	\$135,344	\$125,357 sf	\$123,810	40 sf	65 sf
	<60% AMI	\$29,100	\$728	\$101,508	95,000 co		1 co	1 co
Otero	<80% AMI	\$38,800	\$970	\$135,344	NA sf	\$70,161 sf	0 sf	1 sf
	<60% AMI	\$29,100	\$728	\$101,508	NA co	2004 data	0 co	0 co
Ouray	<80% AMI	\$54,270	\$1,086	\$151,564	NA sf	\$239,675	0 sf	1 sf
	<60% AMI	\$45,450	\$815	\$113,647	NA co		0 co	0 co
Park	<80% AMI	\$51,600	\$1,290	\$179,993	NA sf	\$240,485	30 sf	32 sf
	<60% AMI	\$38,700	\$968	\$134,995	NA co		1 co	0 co
Phillips	<80% AMI	\$38,800	\$970	\$135,344	NA sf	\$81,049	4 sf	5 sf
	<60% AMI	\$29,100	\$728	\$101,508	NA co		NA co	NA co
Powers	<80% AMI	\$38,800	\$970	\$135,344	NA sf	\$69,496 sf	2 sf	8 sf
	<60% AMI	\$29,100	\$728	\$101,508	NA co	2004 data	NA co	NA co
Pueblo	<80% AMI	\$38,800	\$970	\$135,344	\$126,851 sf	\$135,360 sf	196 sf	462 sf
	<60% AMI	\$29,100	\$728	\$101,508	142,500 co	2004 data	8 co	13 co
Rio Blanco	<80% AMI	\$38,800	\$970	\$135,344	NA sf	\$106,073 sf	0 sf	0 sf
	<60% AMI	\$29,100	\$728	\$101,508	NA co	2004 data	0 co	0 co
Rio Grande	<80% AMI	\$38,800	\$970	\$135,344	\$168,298 sf	\$100,746 sf	27 sf	15 sf
	<60% AMI	\$29,100	\$728	\$101,508	NA co	2004 data	NA co	NA co
Routt	<80% AMI	\$52,350	\$1,390	\$182,609	\$440,385 sf	\$273,788	7 sf	4 sf
	<60% AMI	\$39,240	\$981	\$136,878	\$294,583 co Steamboat Springs		3 co	0 co
Saguache	<80% AMI	\$38,800	\$970	\$135,344	\$140,190 sf	\$74,195 sf	9 sf	4 sf
	<60% AMI	\$29,100	\$728	\$101,508	NA co	2004 data	NA co	NA co
San Juan	<80% AMI	\$38,800	\$970	\$135,344	NA sf	\$153,134 sf	0 sf	0sf
	<60% AMI	\$29,100	\$728	\$101,508	NA co		NA co	NA co

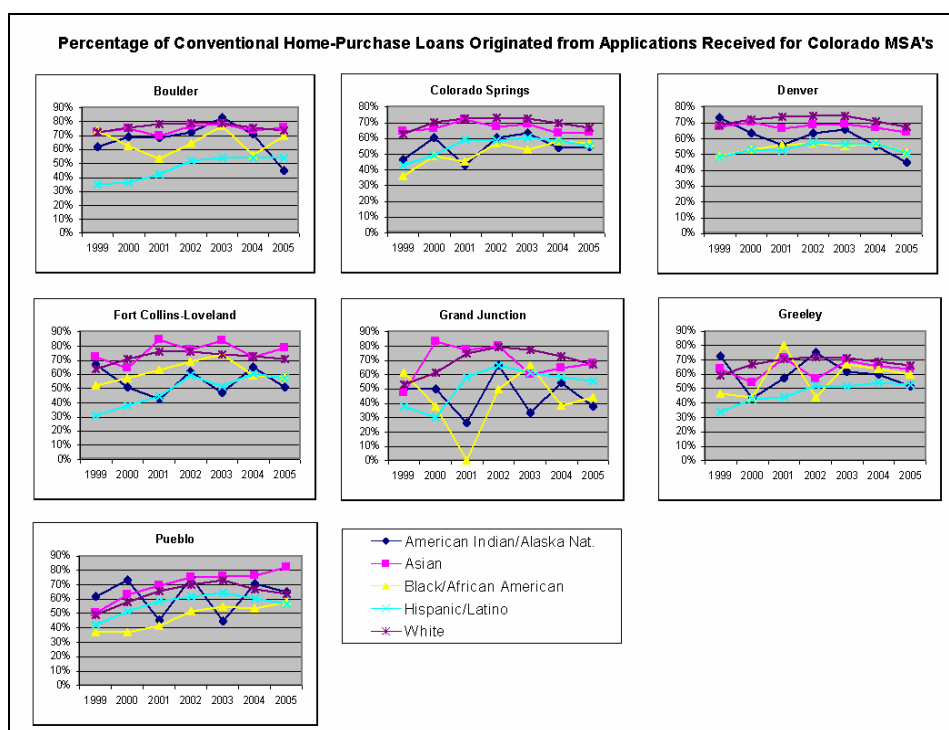
San Miguel	<80% AMI \$51,350 <60% AMI \$38,520	\$1,284 \$963	\$179,121 \$134,367	\$1,887,000 \$750,000	\$552,787	11 sf 3 co	22 sf 0 co
Summit	<80% AMI \$53,650 <60% AMI \$42,300	\$1,341 \$1,209	\$187,144 \$147,552	\$444,167 sf \$248,558 co	\$348,479	0 sf 9 co	3 sf 6 co
Teller	<80% AMI \$53,650 <60% AMI \$42,300	\$1,501 \$1,209	\$168,656 \$126,414	NA sf NA co	\$180,695	42 sf 1 co	54 sf 9 co
Washington	<80% AMI \$38,800 <60% AMI \$29,100	\$970 \$728	\$135,344 \$101,508	NA sf NA co	\$59,513	0 sf 0 co	4 sf 0 co
Weld	<80% AMI \$42,000 <60% AMI \$31,440	\$1,050 \$786	\$146,506 \$109,670	\$195,109 sf \$152,667	\$177,605	321 sf 138 co	165 sf 39 co
Yuma	<80% AMI \$38,800 <60% AMI \$29,100	\$970 \$728	\$135,344 \$101,508	NA sf NA co	\$55,745 sf 2004 data	0 sf 0 co	1 sf 0 co
					TOTAL	6,301	5,326

Source: Colorado Division of Housing in cooperation with Metro Apartment Association, Freddie Mac, Colorado Association of Realtors Metro List, Value West, Inc. and Realtor.com

X. LENDING PATTERNS

The Home Mortgage Disclosure Act (HMDA) of 1975 requires lending institutions to report public loan data by regional catchment area. Beneficiary information, transaction type, lender and other data are available for Colorado regions headquartered in Boulder, Denver, Colorado Springs, Fort Collins/Loveland, Greeley, Grand Junction and Pueblo. Figure 11 shows applications originated by region – that is, loans applied for and approved. Results vary by catchment area, but overall, White and Asian applicants appear to have higher successful origination rates than African American/Black, American Indian/Alaska Native or Hispanic/Latino applicants.

Figure 11



Home Mortgage Disclosure Act, Federal Financial Institutions Examination Council's (FFIEC)

It is difficult to draw conclusions about lending transactions for the state as a whole because of the unknown factors that may have been in play. However, in viewing data by race/ethnicity, the highest conventional purchase loan denial rates were for African American/Black, Hispanic/Latino and American Indians/Alaska Native applicants. These groups also show the highest rates for conventional refinancing loans by sub-prime lenders.

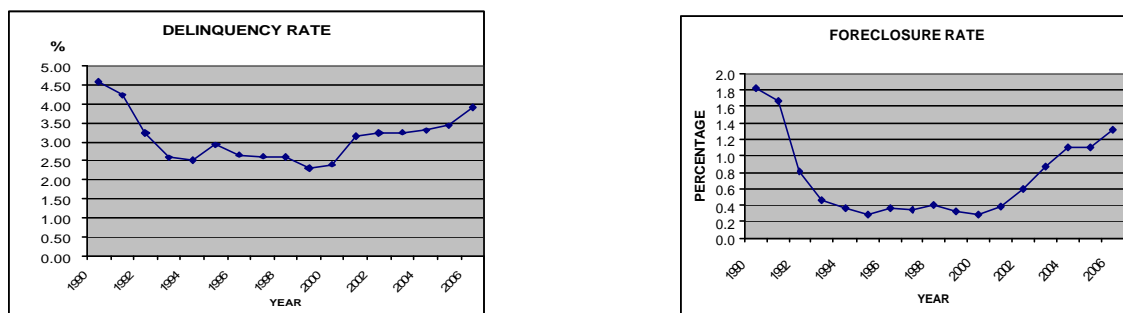
Table 11

State-Wide Mortgage Lending Issues	
% Mortgage Apps for Home Purchase of 1-4 Family Units	41.2%
% Mortgage Loans for Refinancing of 1-4 Family Units	44.6%
% Mortgage Loans for Home Improvement of 1-4 Family Units	4.1%
% Mortgage Loans for Multi-Family Units	0.1%
% Owner Occupied Home Purchase Loans to Low Income Borrowers	27.0%
% Owner Occupied Home Purchase Loans to Middle Income Borrowers	30.5%
% Owner Occupied Home Purchase Loans to High Income Borrowers	35.6%
% Conventional Home Purchase Mortgage loans by Subprime Lenders	17.1%
% Conventional Refinancing Mortgage Loans by Subprime Lenders	19.9%
Data Source: DataPlace by KnowledgePlex retrieved in July 2007 from www.dataplace.org	

HOMEOWNERSHIP STATUS

Housing delinquencies and foreclosures rose dramatically after September 11, 2001. The charts below show delinquencies and foreclosures from 1990 through 2006.

Figure 12



U.S. Department of Housing and Urban Development (HUD) 2007

Foreclosure Sale Statistics: After a 45-60 days period following the initial filing, the property may be sold at auction to a third party or to the mortgage company. Once the foreclosure sale takes place, there is a 75-day period during which time the homeowner can retain the equity in the property by paying off the amount bid at auction plus "allowable fees" (i.e. taxes, insurance, and any interest accrued per day). A borrower can rarely produce cash necessary to pay off such debts and fees, so in most cases, the foreclosure sale indicates the point at which the homeowner is virtually certain to lose the home.

As listed below, the foreclosure filings number and the foreclosure sale number are two independent numbers. In other words, the properties that went to final sale during the current quarter are not the same properties which entered the foreclosure process the same quarter. For example, among properties that went to sale during the second quarter, a large portion of those foreclosures were actually filed during the last quarter of 2006. The properties that entered foreclosure during the second quarter will only proceed to sale in a future quarter.

Why are both numbers important?

The foreclosure filings number provides a view of how many borrowers have become seriously delinquent on their loans. Foreclosure filings provide a good guide to foreclosure activity in a given county, and while a property may later be withdrawn after a filing is made, the filings statistics, nevertheless, indicate where borrowers are delinquent and in default.

The foreclosure sale numbers generally indicate how many households have lost all equity in the home as the result of a home being sold to another party at auction. This other party can be the mortgage company, an investor, or others. Many households in the foreclosure process lose their homes through a variety of processes such as short sales and deed-in-lieu-of-foreclosure agreements.

Losing the home through a foreclosure sale, however, is generally the outcome that is most damaging to the credit of the homeowner/borrower, and it also does not allow for the homeowner/borrower to preserve any of the equity he or she might still have in that property.

Study Findings

For the second quarter of 2007, Colorado public trustees reported 10,015 foreclosures filings. Overall, there have been 19,460 filings reported during the first six months of 2007. For all of 2006, there were 28,435 filings. Statewide foreclosure filings statistics have been kept since 2003:

Table 12

Year	Foreclosure filings
2003	13,573
2004	16,801
2005	21,782
2006	28,435
2007	(Jan-June) 19,460

XI. REGULATORY OVERVIEW

Planning Process

Comprehensive Plans and Planning Codes were examined in Douglas County, and the Cities of Aurora, Colorado Springs, Fort Collins, Grand Junction, Greeley and Westminster to better understand the nature of regulatory barriers or impediments to fair housing. Three notable issues emerged: (1) time required for housing projects to move through the planning process, (2) the definition of family; and, (3) impact fees charged to pay for costs of community infrastructure or service costs. A fourth topic, “gentrification”, came to light from consultations and surveys.

Comprehensive Plans

Comprehensive Plans serve as a community’s guiding policy document for future growth, including changes to existing land uses. Comprehensive plans, along with land use codes, help set the development parameters for the jurisdiction. It is crucial that they do not impede the development of affordable housing with excessive regulation.

Almost every comprehensive plan reviewed includes language to encourage a variety of housing types, however, there is a difference between the meaning of “mixed use development”, a “mix of housing types”, “mixed densities”, “mix of styles”, etc. Douglas County encourages “greater variety in the type and design of housing units”. What does all of this mean to housing affordability? Do any create impediments to fair housing?

It is clear that there is no impediment to fair housing with the language in the preceding paragraph. Each example is in place to assist a local jurisdiction in making decisions about **different sizes** of housing in a community, or more **densely developed** parcels, or **different styles** of housing. While, each expresses the **intent to vary housing** across a community, two of these are more likely to actually reduce the costs of housing: “mixed densities”, which implies a broader view of housing types in a neighborhood, and “mixed use development”, which allows more than one land use category in a given area (for example housing above businesses).

BUILDING/DEVELOPMENT CODES

Building and development codes are essential documents for local jurisdictions. When codes become too specific, they can impede affordable housing. As an example, a portion of the development code for a large city in the Denver Metropolitan Area has very specific design standards for new construction, including:

"12. Menu of Design Elements for Small, Medium, and Large Multi-Family Buildings.

In addition to other applicable standards required in this section, each small, medium, or large multi-family building shall incorporate at least 5 of the following architectural features:

a. The average rentable living area of all units in the building is at least 900 square feet.

b. The total wall area of exterior walls of the building, excluding windows and doors, is at least 80 percent brick, or at least 40 percent stone in combination with brick or stucco.

c. The building's main roof is clad with clay or concrete tiles.

d. The building's main roof is pitched with at least a 6 in 12 slope.

e. The building's main roof is pitched with at least seven distinct ridgelines, at

least two of which are at least two feet apart in height, and two of which are at right angles to the others.

f. At least two ends of the building step down one story or more in height.

g. At least 50 percent of the units in the building have an outdoor balcony of the minimum size required by the standards in this section.

h. All building elevations contain at least three distinct wall planes separated from each other by at least two feet.

i. At least 50 percent of the units are provided with an attached one-car or larger enclosed garage.

j. All rain downspouts are enclosed within the walls of the building.

CD146-9:29

k. At least 4 bay windows in a small multi-family building, or at least 8 bay windows in a medium multi-family building.

l. At least two real or simulated chimneys on an exterior wall.

(Ord. No. 2001-72, 12-3-2001; Errata of 9-11-2002, 39--43; Errata (2) of 12-30-2002, 13,15; Errata (4) of 12-30-2002, 11--13; Errata of 1-3-2003, 5, 7) Sec. 146."

At some point, regulation can impede the construction of housing that is affordable to its residents.

DEVELOPMENT IMPACT FEES

Impact fees are becoming more commonplace in Colorado communities, and they may include such items as water and sewer system improvement (plant investment fees), storm drainage assessment fees, and fees for parks and recreation, open space, trails, schools, public facilities (may include libraries, cultural facilities, town halls, museums, fire and police stations, etc.), and mass transit facilities. The proliferation of fees may impede fair housing.

OCCUPANCY CODES

Occupancy codes may limit the number of related or unrelated persons per unit, per room or by square footage. Occupancy limits are one way that local jurisdictions may reduce the number of large families. Fair Housing laws prohibit discrimination on the basis of familial status.

LAND COSTS

Due to the current high costs of land and its preparation, it is very difficult for developers to produce new units that can serve low-income renters.

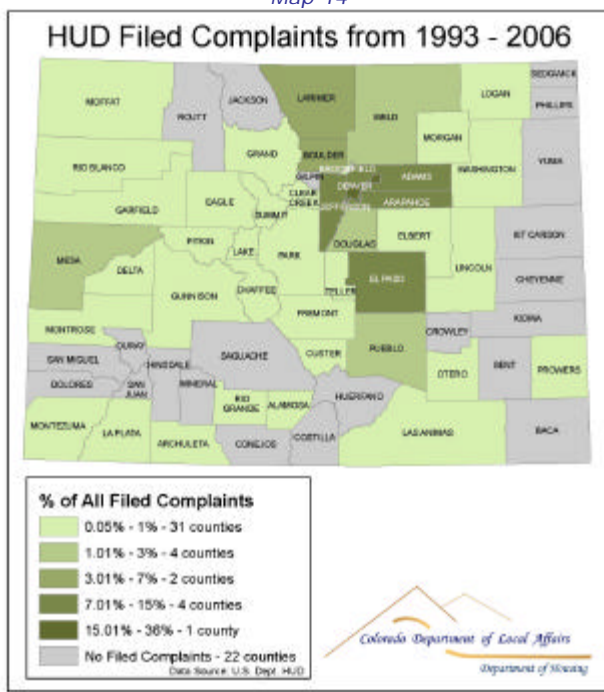
XII. FAIR HOUSING COMPLAINTS

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended in, 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 (including children under the age of 18 living with parents of legal custodians, pregnant women, and people securing custody of children under the age of 18), and handicap

Colorado statutes include marital status, creed and ancestry with those federal definitions of Fair Housing. It also violates the law to refuse to make reasonable accommodations for persons with disabilities or to harass or interfere with a person exercising their Fair Housing rights.

HUD's Office of Fair Housing and Equal Opportunity (FHEO) and the Colorado Civil Rights Division (CCRD) are the two agencies that receive complaints regarding housing discrimination in Colorado. Through a Freedom of Information Act request HUD provided Fair Housing Complaint information. The majority (79%) of Fair Housing complaints received by HUD between 1993 and 2006 were filed in the Denver Metropolitan Area.

Map 14

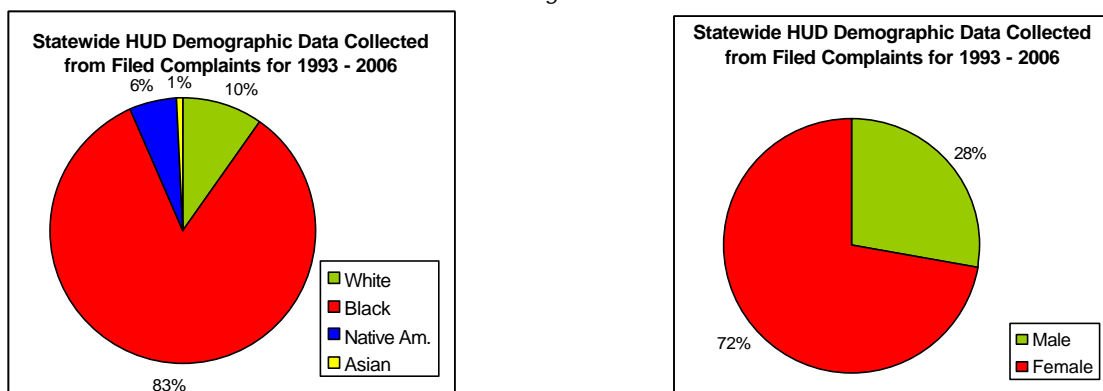


Analysis of the data revealed other issues. While a total of 2178 different claims were filed during the time observed, the number of parties that filed

complaints is fewer. It is possible for one person to file complaints on several different causes; to experience violations in different years; or to experience discrimination in different counties.

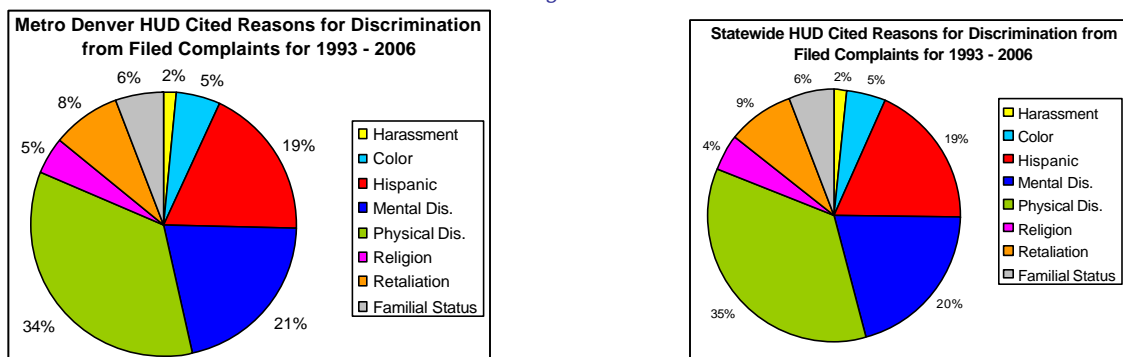
Numbers of cases in the database are fewer in recent years. One reason for this may be that HUD cannot make information available until a case is resolved or dismissed. As is the nature of legal issues, it can take many months or even years before final resolution. It is also possible that fewer persons are filing claims because of inadequate education about Fair Housing, or concern about the complexities, time and costs of doing so. Demographics of those filing Fair Housing complaints are shown below.

Figure 13



Fifty-five percent of persons filing complaints in metropolitan Denver, and in the state as a whole, cited physical or mental disability as one of the reasons for their complaint. Nineteen percent indicated that their Fair Housing rights were violated due to their Hispanic ethnicity and five percent because of color. Of HUD-filed Fair Housing complaints that contained demographic data, nearly 60% were filed by blacks.

Figure 14

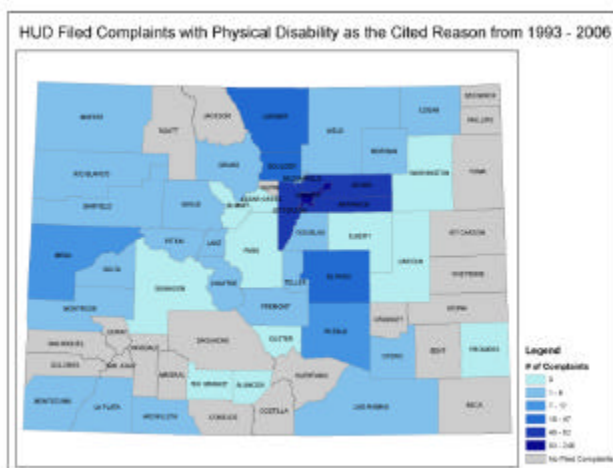


SOURCE: HUD Fair Housing Complaints Database through 4/2007 Freedom of Information Act Request

To further examine this issue, we gleaned data from the HUD Fair Housing Complaints Database regarding housing discrimination on the basis of disability. Claims of this nature were asserted most frequently in Adams, Arapahoe, Denver and Jefferson Counties, followed by Larimer, Boulder and El

Paso Counties. This demonstrates a need for further education for both private and public sector housing providers about reasonable accommodation and housing for persons with disabilities. See map below. (MAP 15)

Map 15



- Provide opportunities for low and moderate income Coloradoans to purchase their own homes.
- Increase the number of homeowners in the regional housing organization's service area.
- Create and maintain a regional revolving loan fund to assist future families with Down Payment Assistance.
- Enhance neighborhoods and communities.
- Provide stability for families and achieve lower foreclosure rates by requiring pre- homeownership counseling.
- Annual follow-up with families is highly recommended, as well as the provision of foreclosure counseling, if needed.

318 persons were served

Of the 318 persons served, ethnicity and race statistics were collected and are as follows:

White	312, of whom 59 are Hispanic/Latino
Black	4
Asian	2

Of the 318 persons served, the incomes reported are as follows:

30%	4
41-50 %	140
51-60%	108
61-80%	66

Single Family Owner Occupied Rehabilitation Program Statistics 2002-2005

Single-Family, Owner-Occupied (SFOO) Housing Rehabilitation Programs are designed to improve the quality of housing stock through the completion of various housing rehabilitation measures. The outcomes for the SFOO Housing Rehabilitation Program include:

- Preserve, enhance and maintain affordable housing stock through repair and renovation within the community.
- Protect the health and safety of the occupants through the correction of housing hazards.
- Assist homeowners in improving the condition of their homes.
- Allow homeowners to stay in their homes.
- Create and maintain a regional revolving loan fund to assist with future housing rehabilitation projects.
- Develop and sustain a network of local contractors to complete housing repairs and renovations.

324 households, of which 99% were < 80% AMI

19% handicapped/ disabled
16% female head of
 households
56% Hispanic/Latino

CDH plans to improve our monitoring tools and develop a certification tied to the Department of Local Affairs Oracle database to better ensure subgrantees are both aware of and complying with Fair Housing law.

Tenant Based Rental Assistance Program

The Colorado Division of Housing (CDOH) created the Tenant Based Rental Assistance (TBRA) program in 2004 using HOME funds to create a pilot program that would respond to a changing rental market while meeting the needs of lower income households. At that time, vacancy rates were too high to justify developing new affordable rental units, and CDOH decided to fund limited-scope TBRA programs. Additionally, the Section 8 rental assistance program both statewide and nationally, was experiencing funding reductions, which limited the amount of rental assistance available for low income families. CDOH launched the TBRA program with the goal of using the HOME funds to create a flexible rental assistance program would provide relief for local communities. The program also assists communities by providing immediate housing assistance for homeless families living in shelters and who are working or have work skills. By reducing the time a homeless family spends in a shelter, families can become stabilized more quickly in order to focus on becoming self-sufficient.

A secondary goal of the TBRA program is to encourage participants to consider leasing units in the affordable housing properties that would otherwise be vacant. For participants, renting a TBRA assisted unit would provide a longer term opportunity to pay an affordable rent after the TBRA assistance is terminated.

Total # in Households	Single Head of Household	# of Disabled in Households	Race (White)	Other
1,128	856	193	732	396

All TBRA recipients are 30% or below of the AMI

All TBRA recipients are homeless, either living in a homeless shelter or if they lack a fixed, regular, adequate night time residence.

Section 504 and Accessibility

Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability in any program or activity that receives financial assistance from any Federal agency. Section 504 imposes requirements to ensure that “qualified individuals with handicaps” have access to programs and activities that receive Federal funds. In regards to new housing construction (which includes Federal assistance) it also requires that 5% of the dwelling units, or at least one unit, whichever is greater, must be accessible top for persons with mobility disabilities and an additional 2% of the dwelling units, or at least one unit, whichever is greater, must be accessible for persons with hearing or visual disabilities.

Fund Source	Amount	Total Units	Accessible Units	
			Mobility	Hearing and Visual
HOME Funds	\$5,363,618	692	35	14
Community Development Grant Funds	\$1,000,000	108	6	2
Block				

In the four year period between January 1, 2002 and December 31, 2006, Colorado Division of Housing funds assisted in the construction of 800 new affordable housing units including 57 accessible units.

Consumer Directed Attendant Support Program

The Colorado Department of Health Care Policy and Financing (HCPF) has developed a new program since 2001 that serves 500 people at a time that enables people with disabilities to manage their own attendant services in their own home verses a nursing facility. In the Consumer Directed Attendant Support (CDAS) program, people hire, train, supervise and fire their own attendants. They can set their own attendant schedules and, to a significant degree, they can determine what services the attendants provide.

XIV. FAIR HOUSING RESOURCES

The Colorado Civil Rights Division and the Office of Fair Housing and Equal Opportunity, U.S. Department of Housing and Urban Development, Region VIII are the entities charged with Fair Housing enforcement and handling of complaints in Colorado. Housing Authorities and local governments are also recipients of housing complaints for their jurisdictions.

Colorado Coalition for the Homeless travels across the state to provide Fair Housing education and training to communities. A large number of Fair Housing web pages exist in the state, and advocacy groups provide

information to client consumers. The American Bar Association maintains a list of sites and links helpful to a verity of Fair Housing needs <http://www.cobar.org/group/index.cfm?EntityID=dba&category=1050>.

The Colorado Cross Disabilities Coalition website contains a variety of Fair Housing Advocacy information <http://www.ccdonline.org/>.

Since the demise of the organization, Fair Housing for All, an active, cohesive coalition of advocates and providers is missing. This is an impediment to Fair Housing education because such a group can plan and coordinate fair housing training activities across the state. Additionally, HUD needs to renew funding for such an organization and for fair housing testing.

XV. IMPEDIMENTS TO FAIR HOUSING CHOICE

As a result of comprehensive analysis, review of data, documents, policies and studies on national, statewide and local basis, in addition to key informant interviews consultations and surveys, the State of Colorado identifies the following impediments to Fair Housing Choice followed by a plan for action.

(1) Lack of Affordable Housing. Research determined that the greatest barrier to fair housing throughout the State is the lack of affordable units that can ensure fair housing choice. Homeowners that pay more than 30% of their incomes for housing are considered housing cost-burdened. When they pay more than 50% of their income for housing costs, they are severely cost-burdened.

Cost burden affects a household's ability to attain adequate nutrition, child care, medical expenses or medical insurance, transportation or other basic needs. Listed below are some of the often-sited reasons that housing is unaffordable.

- **Lack of an Adequate Supply.** Research determined that the greatest barrier to fair housing throughout the State is the lack of an adequate supply of affordable housing, especially for households with incomes less than 30% of the Area Median Income (AMI) and housing for special needs populations. This includes homeownership opportunities, affordable rental housing and, in particular, housing for special-needs populations.
- **Impact Development Fees.** Many local jurisdictions pay for new growth in the community through the use of impact development fees. These fees may include water, wastewater, parks and recreation facilities, fire stations, libraries, and road improvements among other items. These development charges add an additional layer of cost to the expense of creating affordable housing units.
- **Land Costs.** Land costs continue to be an impediment to the production of an adequate supply housing that will promote fair housing choice. This is especially true in resort communities or rapidly developing communities.
- **Housing Planning for All Income Levels.** An impediment exists where local communities do not acknowledge or plan to meet the housing needs of a variety of income levels, including very low-income households. Although a significant number of local jurisdictions have incorporated policies, plans, and activities to encourage affordable housing, many communities have not. This may result in a workforce that cannot live in the same community in which they are employed. In fact, it may lead to traffic congestion, increased

transportation costs and an inability of low-income populations to work in retail or service sectors in those communities.

- **“Gentrification” of Existing Neighborhoods.** Urban renewal programs or neighborhood redevelopment reduces blighted or dilapidated housing units, but may also lead to “gentrification” that results in fewer affordable units being available in the area. Or, rents may increase as local real estate becomes more “pricey”.

In the cases where developers receive Community Development Block Grant (CDBG) or HOME Investment Partnership Act funding for their projects, developers may incur relocation expenses to assist tenants in accessing other housing. Where no HUD funds are used, developers generally do not assist in relocating tenants.

(2) Issues for Housing for Persons with Disabilities. As the baby boom population ages, there will be increased pressure on existing affordable, accessible units. Persons with disabilities need unit choice, accessibility and affordability.

- **Inadequate Supply.** Even with 504 Accessibility standards in place and the fact that the development community is beginning to produce additional accessible units for seniors, the supply of affordable, accessible housing is not keeping up with demand.
- **Modification/Rehab of Existing Rental Units.** Landlords with one or two units of rental housing may not have access to affordable funding to modify units to make them accessible.
- **Inadequate Supply of Units for Person with HIV/AIDS.** Advocates for the population with HIV/AIDS also report an inadequate supply of affordable housing for persons with HIV/AIDS.

(3) Foreclosures. For the first quarter of 2007, Colorado public trustees reported 9,254 foreclosure filings. 2007 foreclosure filings for the first quarter alone equal one-third of all filings from 2006 when 28,453 foreclosure filings were reported.

If foreclosure filings keep on pace for the rest of the year, much of the state will experience an increase in foreclosure filings ranging from 20%-30%. Foreclosure filings in Colorado increased 31% from 2005 to 2006 and 110% between 2003 and 2006. Forecasts indicate that, barring major changes in economic conditions, foreclosure filings in Colorado will increase to approximately 36,000 for 2007, a 25% increase from 2006.

The most significant foreclosure activity is on the Front Range of Colorado. The counties with the most foreclosure filings per household were Adams, Weld, Arapahoe, Denver, and Pueblo. Adams and Weld counties topped the list with 1 in 98 and 1 in 124 households in foreclosure respectively. In Denver County, 1 in 127 households are in foreclosure. El Paso County and Pueblo County reported foreclosure rates of 1 in 254 and 1 in 152 respectively.

Foreclosure rates are lower in Mesa and Summit Counties with a foreclosure rate of 1 in 505 and 1 in 680 respectively. La Plata County reported a foreclosure rate of 1 in 1126.

At a national level, civil rights groups including the Leadership Conference on Civil Rights, the NAACP, the National Fair Housing Alliance, La Raza and the Center for Responsible Lending have called on mortgage lenders, loan servicers, and loan investors for an immediate six-month moratorium on sub-prime home foreclosures. (*Valuation*, 2nd Quarter 2007)

(4) Need for Fair Housing Education and Coordination. There needs to be focused leadership, a coordinated strategy to prevent or mitigate impediments to fair housing and fair housing testing. Many residents do not know how to access information about Fair Housing. Although Fair Housing information is posted on the State Website, CCRD, CHFA and other agencies, residents may not be aware of websites or access to it. Information should be published in both electronic and paper formats for people who feel they have been discriminated against and are seeking assistance.

(5) Homeowner Associations (HOAs.) The Colorado Civil Rights Division (CCRD), the state agency that investigates civil rights violations, indicates that many complaints filed with CCRD in the last year revolve around the refusal of HOAs to accommodate persons with disabilities or special needs.

(6) NIMBY. The “Not in My Backyard Syndrome” is an impediment to affordable housing. Neighborhood opposition to affordable housing and special needs housing may prevent or discourage development of affordable units. There is a need for improved public involvement and communications early in the planning process to ensure that potential issues are addressed.

(7) Language/Cultural Barrier. Persons who do not speak English may encounter difficulties with housing choice, or may not understand their rights as a tenant or homeowner which leaves those households vulnerable to discrimination or unfair acts by unscrupulous landlords

(8) Familial Status. The definition of “family” may result in limits on the number of unrelated persons living in a unit. Many portions of the state reported that zoning codes severely limiting the number of unrelated persons living in a unit drive up housing costs for low-income residents.

(9) Land Use Regulations. Key informant interviews revealed potential impediments to fair housing choice that result from land use regulation.

(10) Predatory Lending Practices. Federal Bureau of Investigation (FBI) reported that Colorado made its “top ten” list of states with high numbers of predatory lending investigations. Although Colorado recently passed legislation to license mortgage brokers, this issue remains a concern.

(11) Transportation. As the urban areas in Colorado expand, affordable housing may be farther and farther from employment centers. If housing is too distant from jobs for low-income households, a dramatic increase in transportation costs may occur. The lack of affordable housing along transit stops is an impediment to fair housing.

(12) Landlord/Tenant Issues

- **Illegal Evictions.** Disability advocates in the Mesa and Montrose county area reported clients evicted to make way for new tenants who would pay higher rents. While this practice does not appear statewide, it may occur more often in high-demand markets. Tenant-training programs can reduce the number of incidents in those markets.
- **Need for Timely Response from Landlords.** Landlords do not always respond to tenants on a timely basis.

(13) Housing Discrimination. Home Mortgage Disclosure Act (HMDA) data, HUD complaints data, and information supplied by the Colorado Division of Civil Rights, provide insight to long-term issues in Colorado. It is difficult, however, to determine whether discrimination has occurred. HMDA data does show the highest conventional purchase loan denial rates were for Blacks and Hispanics. These groups also show the highest rates for conventional refinancing loans by sub prime lenders. Additionally, of HUD-filed Fair Housing complaints that contained demographic data, nearly 60% were filed by blacks.

Many communities have zone districts that do not allow for mixed-use development. That is, land use regulations may separate various land uses rather than allowing a mixed of uses that could result in housing for a variety of income levels. Although areas already intensely developed are unlikely to change substantially, local jurisdictions have an opportunity to allow mixed use in undeveloped redeveloping areas. Inclusion of a variety of uses and housing types within a community may improve the housing/job/transportation issues faced by many lower income residents.

(14) Steering. Steering is a practice of guiding prospective homebuyers or renters of protected classes (such as color, race, religion, disability, familial status, etc.) to areas with concentrations of persons in those groups. No direct evidence of steering was found in this analysis, but it is important to acknowledge here that such practices can occur.

(15) Income/Wage Issues. Wages in Colorado have not kept pace with the costs of renting or purchasing a home. This creates an impediment to Fair Housing because Colorado's more vulnerable populations may be unable to rent an affordable unit or may be severely cost-burdened.

(16) Housing Visitability. The ability to visit housing is an important fair housing concern in Colorado.

(17) Insufficient Housing for Homeless Persons. There needs to be an adequate supply of housing for persons who are homeless and persons coming out of institutions, including prison, jail, and mental health facilities..

XVI. MONITORING FOR IMPEDIMENTS

The Colorado Division of Housing (CDOH) enforces federal civil rights regulations governing each program through our application underwriting, contract terms, project performance plan, technical assistance, project close out and monitoring requirements. The CDOH loan/grant application requires that all applicants certify that they will affirmatively further fair housing and comply with the Civil Rights Act of 1964 and 1968.

Applicants must also address the requirements for handicap accessible units in their project application, and a public hearing must be conducted to gather public and private comments on the proposed project, the meetings must be handicap accessible and outreach must be done for non-English speaking citizens. CDPH contracts require compliance with all applicable civil rights laws, including Section 504, Section 3 and the Age Discrimination Act. CDPH project performance plans list outreach and affirmative marketing plan requirements. When needed, CDPH staff will provide technical assistance to a grantee so that they may comply with civil rights requirements. CDPH asset managers monitor each project to further ensure civil rights compliance. The CDOH Project Close-Out (PCO) requires the reporting of direct benefit activities in order to track those who have been served with federal/state funding. The PCO also requires the grantee to list in writing the actions they have undertaken to affirmatively further fair housing.

CDOH maintains monitoring records and project close out data which shows that it has reviewed the civil rights performance of each grantee. This documentation is contained in project files and HUD's IDIS system.

XVII. RECOMMENDED ACTIONS AND STRATEGIES:

OVERCOMING IMPEDIMENTS TO FAIR HOUSING

The recommendations listed below cover a range of activities and recognize that the reduction or elimination of impediments is unlikely to take place without the actions of a number of public and private sector entities. Actions will require collaboration and coordination between federal, state, regional and local organizations.

LACK OF AFFORDABLE HOUSING

Affordable Housing Supply

I. Colorado Division of Housing (the Division, or CDOH) will work with local governments to help fund Housing Needs Assessments that provide a consistent baseline of housing information across all Colorado counties.

II. CDOH will continue to participate in and facilitate the “housing pipeline” with other agencies including the U.S. Department of Housing and Urban Development (HUD), U.S. Department of Agriculture Rural Development (R.D.) the Colorado Housing and Finance Authority (CHFA). The pipeline will collaborate to maintain the current supply of affordable rental units and to increase the supply of new units when warranted by the market.

III. The Division will work with owner-occupied housing rehab programs and determine if a renter-occupied housing rehabilitation program is feasible.

IV. CDOH will prioritize funding and production of units for households making less than 30% of the Area Median Income (AMI).

V. CDOH will work with the Colorado Housing Finance Authority (CHFA), U.S. Department of Agriculture (USDA) and other state and federal agencies to maintain coloradohousingsearch.com database that enables Colorado households to search for affordable housing.

VI. CDOH will participate in discussions that research options for resources for a mechanism that can provide long-term, adequate and flexible funding for affordable housing and homeless projects.

VII. The Division will continue to enforce use restrictions on the rental housing projects that it funds so that rents will remain affordable.

VIII. Cooperate with other agencies to create a statewide homeless plan for housing and services.

Impact Development Fees

I. Work with local governments during the strategic planning process to encourage infrastructure funding methods that do not increase the price of producing affordable housing.

II. Annually, publish “Affordable Housing: A Guide for Local Officials” as a tool for local governments in creating affordable housing and reducing regulatory barriers.

Land Costs

I. Encourage local jurisdictions to contribute land or otherwise reduce the land cost in the housing equation.

For example: local governments may allow more density, thereby reducing land costs; or, they could assemble parcels for redevelopment and sell at low cost or contribute the land to affordable housing projects.

II. Encourage/fund land banking or land trusts that are available for future affordable housing projects.

Housing Planning for All Income Levels

I. Work with local jurisdictions to assist them as they develop local Strategic Housing Plans that result in achievable housing goals.

II. Incorporate planning for a statewide homeless plan.

"Gentrification" of Existing Neighborhoods

I. Work with local governments, for-profit and nonprofit housing developers to identify solutions to increased rents or displacement issues in urban renewal areas.

(2) HOUSING FOR PERSONS WITH DISABILITIES

Production of an Adequate Supply

I. Provide incentives to housing developers to exceed Section 504 accessibility requirements in the production of housing for persons with disabilities.

II. Establish a program that can assist landlords in modifying units to meet accessibility standards in order to increase the supply of accessible units.

III. Encourage local housing and disability service agencies to conduct tenant training programs to increase client knowledge of fair housing rights.

IV. Use Home Partnership or State Housing Grants to fund permanent housing units for persons with HIV/AIDS.

(3) FORECLOSURES

I. Partner with Federal lending agencies, state agencies and lending institutions to establish a Foreclosure Prevention Hotline.

II. Fund housing counseling and foreclosure prevention activities so that homeowners receive timely, accurate and helpful information to enable them to retain homeownership

(4) NEED FOR FAIR HOUSING EDUCATION

I. Establish a Fair Housing contact at the Division of Housing.

II. Provide/coordinate training for Fair Housing with other statewide, federal and nonprofit housing agencies including CCRD, CHFA, Colorado Department of Human Services, Supportive Housing and Homeless Programs (SHHP), Fannie Mae, Freddie Mac, Colorado Coalition for the Homeless (CCH), Colorado AIDS Project statewide disability organizations and other fair housing leaders. Req

III. Ensure that all partners provide webpage links to the Colorado Civil Rights Division (CCRD) and the U.S. Department of Housing and Urban Development (HUD), along with information about Fair Housing Rig

IV. Conduct a series of neighborhood events. Invite free speakers to discuss tenants' rights, relocation benefits, rehabilitation programs, home-buying, techniques, financing, legal information, etc.

V. Request that HUD conduct or fund Fair Housing testing

(5) HOMEOWNER ASSOCIATIONS (HOAS)

- I. Work with statewide partners to develop better education for homeowner's associations, homeowners and renters concerning Fair Housing practices.

(6) NIMBY.

- I. Continue to promote awareness of the need for affordable housing in Colorado communities.
- II. Partner with the Division of Local Government, the Colorado Municipal League and Colorado Counties Incorporated and Housing Developers to promote "best planning practices" that involve neighborhoods and the public at the beginning of the housing development process.

(7) LANGUAGE/CULTURAL BARRIERS

- I. Translate key documents regarding Fair Housing, Landlord-Tenant Relationships, Homeownership, etc. to Spanish and/or other common languages for online access.
- II. Encourage other affordable housing practitioners to also translate and provide documents for online access.

(8) FAMILIAL STATUS

- I. Work with partner agencies to conduct Fair Housing training that informs local governments about familial status issues.

(9) LAND USE REGULATION

- I. The Divisions of Housing and Local Governments will continue to provide technical assistance to rapidly growing rural communities in developing comprehensive plans local codes and zoning ordinances.
- II. CDOH will continue to update and distribute written material such as "Affordable Housing: A Guide for Local Officials" "Housing Colorado Reports" and information on regulatory barriers.

(10) PREDATORY LENDING PRACTICES

- I. Provide online information and training such as the "Puzzle of Homeownership" to increase knowledge of existing and potential homeowner's surrounding homeownership and lending practices.
- II. Continue to work with statewide Fair Housing leaders to provide written and electronic versions of brochures on predatory lending.
- III. Continue to conduct training with agencies that receive CDOH funding regarding fair lending practices.

(11) TRANSPORTATION

- I. Encourage local governments to create housing that creates a jobs-housing balance, including transit-oriented development and land banking.
- II. Incorporate and evaluation of transportation issues as part of Housing Needs Assessment and Strategic Planning processes.

(12) LANDLORD/TENANT ISSUES

- ***Illegal Evictions.*** Encourage housing providers and service agencies to conduct tenant-training programs to reduce the number of incidents in those markets.
- ***Need for Timely Response from Landlords.***
Take actions that encourage landlord responsiveness to tenant rights.

(13) HOUSING DISCRIMINATION

- I. Provide Fair Housing information online and in written format.
- II. Encourage housing for a variety of income types and abilities.

(14) STEERING

- I. Provide Fair Housing information online and in written format.

(15) INCOME/WAGE LEVELS VS. COST TO RENT OR PURCHASE

- i. Encourage dialogue and local government planning about jobs housing balance.

(16) HOUSING VISITABILITY.

- I. Require developers applying for Division of Housing funding to perform an analysis of the visitability of proposed single and multi-family units for both rental and homeownership projects.

(17) INSUFFICIENT HOUSING FOR HOMELESS PERSONS.

- I. Actively work with the Colorado Community Interagency Council on Homelessness to create strategies to address homelessness in the State.
- II. Encourage the CCICH to create a collaborative taskforce that addresses the issues of homeless persons who have criminal backgrounds so they are able to get back on their feet and be productive members of society

XIX. Public Hearing

The Colorado Department of Local Affairs Division of Housing conducted a public hearing on Monday, September 25, 2007 at 4:00 p.m. until 5:30 p.m.

The following persons attended:

David E. Bolin, Executive director of Center for People with Disabilities, Boulder

Valerie L. Corzine, Esq. The Legal Center for People with Disabilities and Older People, Denver

Tim Wheat, Community Organizer, Center for People with Disabilities, Boulder
Diane Iscoe, interested citizen

Testimony also included comment on the following:

(1) Need to examine homeownership opportunities for persons with disabilities so that they might be able to renovate and become owners of foreclosed properties with no mortgage or an affordable mortgage. In turn, those recipients could free up their Section 8 voucher. Current Section 8 homeownership places too many restrictions on homeownership.

(2) Need for housing for persons with criminal records. Most of the homeless population are persons who have some type of criminal background. When they are released from prison there is no place for them to go. Many also have disabilities. Some of these persons are released to nursing homes and there are no funding sources available that can assist in re-housing them, including funding for supportive services. Section 8 rules generally preclude persons with a criminal background from accessing vouchers.

(3) Encourage affordable housing developers, public and private, to partner with Independent Living Centers to create affordable housing.

(4) The State should consider support of a Tenant's Rights Bill. Tenants should be able to receive a copy of their lease and should be able to receive their deposit back within 30 days. There is no requirement for landlords to respond in a timely manner.

(5) Search for opportunities such as older alternative care and nursing home facilities to and create more Single Room Occupancy (SRO) unit.

(6) Establish better enforcement of Fair Housing laws through testing programs.

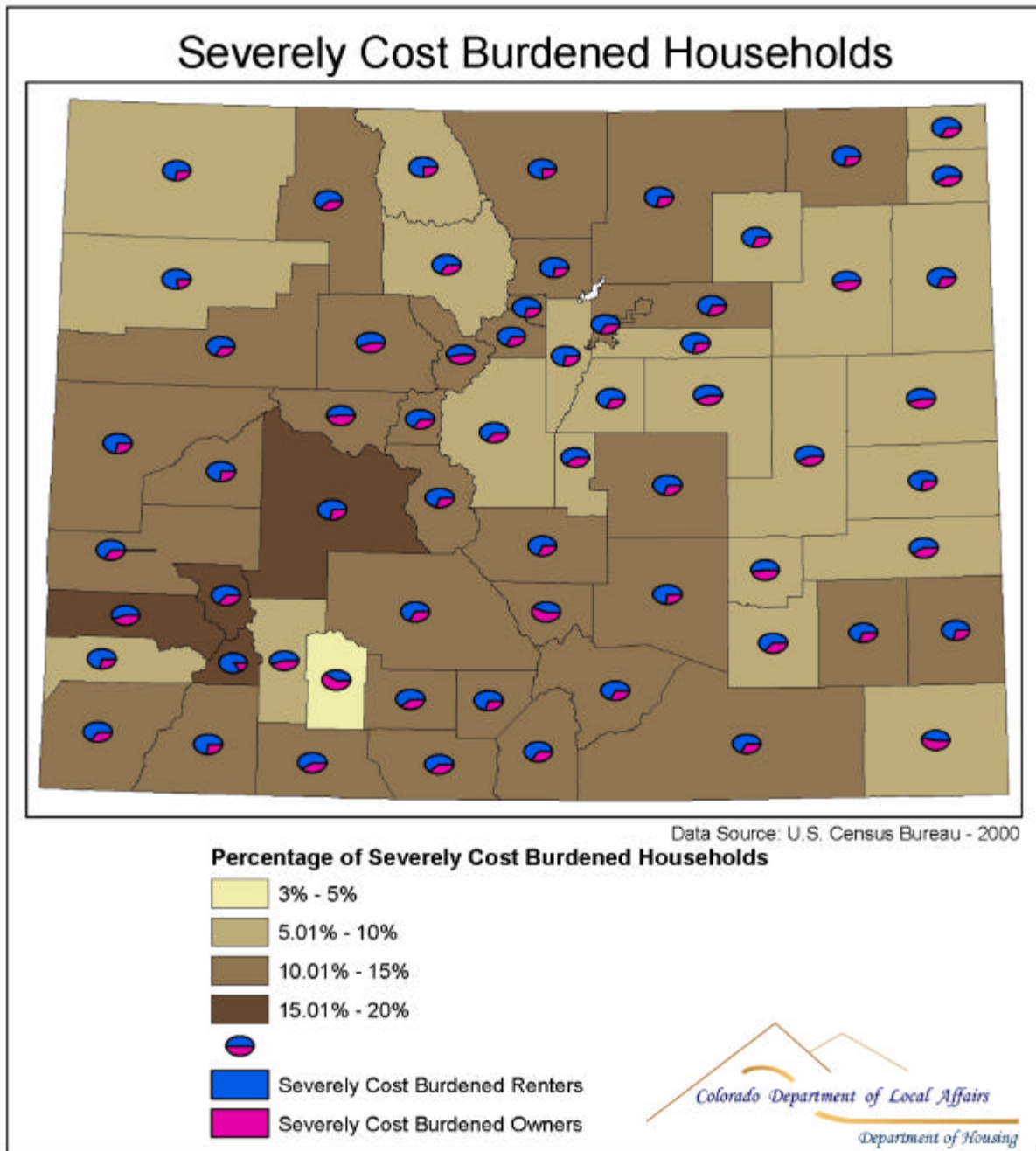
(7) Know that people with low-income and disabilities want to feel proud about something. Help them to access homeownership.

The final Analysis of Impediments to Fair Housing incorporates many of these strategies as a result of this testimony.

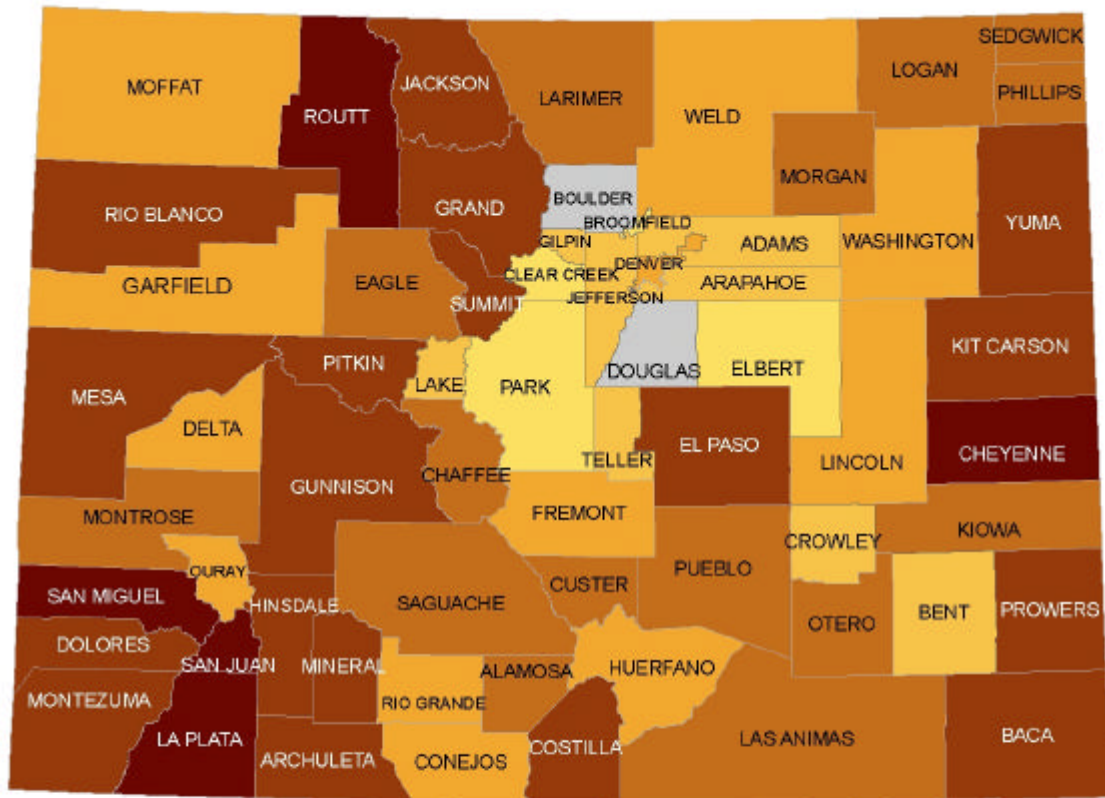
APPENDIX

MAPS

Additional maps provided below are from 2000 Census data unless otherwise noted.



Percentage of Residents that Work and Live in the Same County

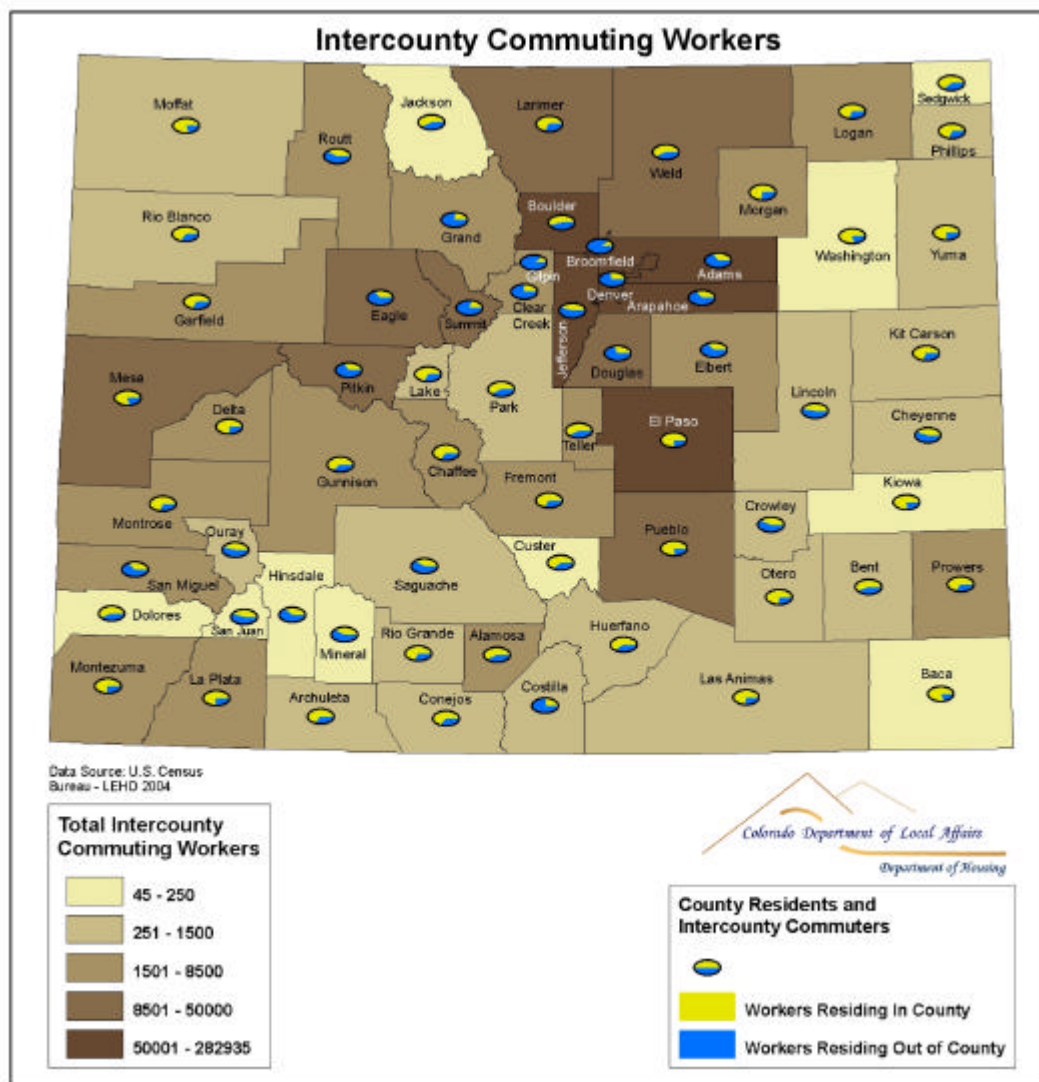


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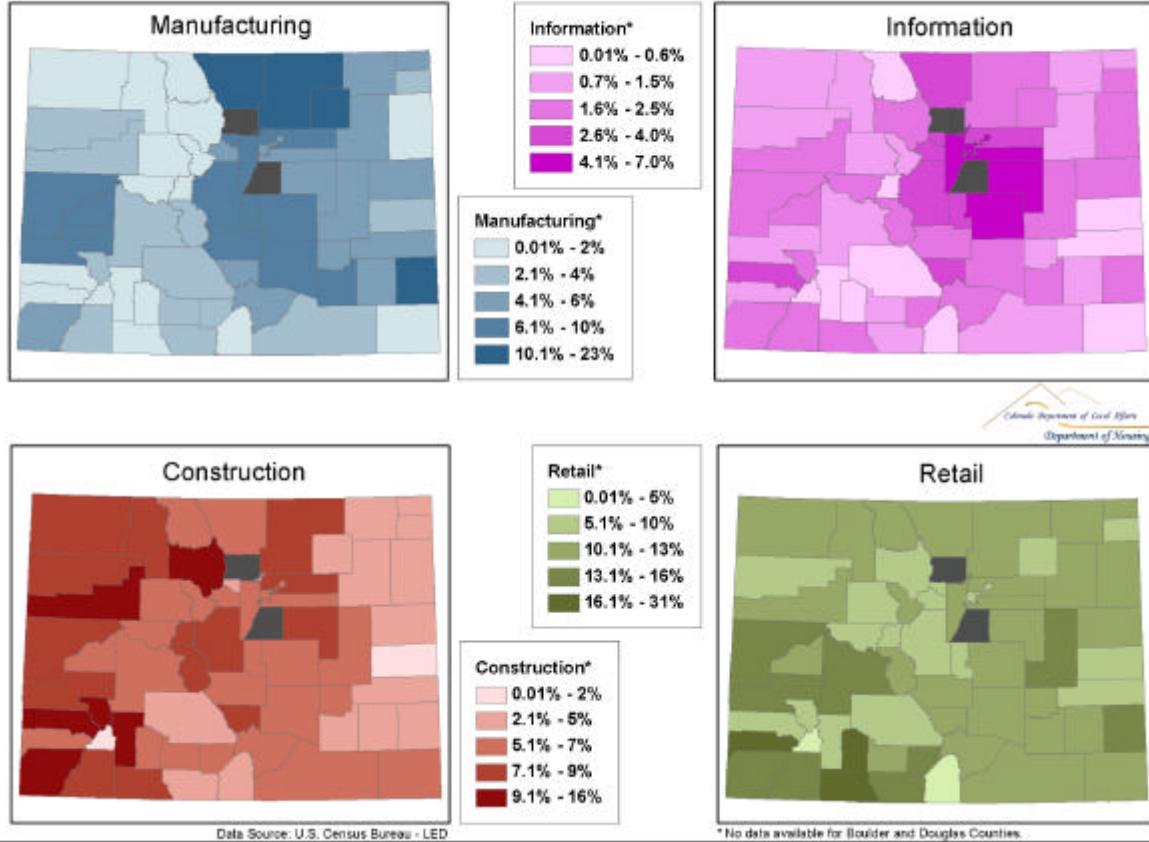
- No Data
- 1% - 23%
- 24% - 43%
- 44% - 58%
- 59% - 71%
- 72% - 79%
- 80% - 89%

Data Source: U.S. Census Bureau - LED





Colorado Industry in 2004



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