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Draft Report

*2020 Analysis of
Impediments to Fair
Housing Choice in
Adams County*

PREPARED FOR:

Adams County

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SECTION I.

EXECUTIVE SUMMARY

SECTION I.

Executive Summary

The Analysis of Impediments to Fair Housing Choice, or AI, is a planning process for local governments and public housing agencies (PHAs) to take meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination.

Primary Findings

The analyses of community engagement (Section II), demographics (Section III), access to opportunity (Section IV), disproportionate housing needs (Section V), and fair housing environment (Section VI), yield the following primary findings for Adams County and participating jurisdictions within the county.

A note about COVID-19. It is important to note that resident engagement for this AI was conducted in the fall of 2019 and winter of 2020, in the early stages of the COVID-19 outbreak. As such, the engagement outcomes primarily reflect pre-COVID economic conditions and should be considered a baseline measure of resident needs. The housing situation and needs of residents during that period are still relevant and can help inform short- and long-term policy responses to stabilize households and preserve and add to the supply of affordable housing.

Resident survey findings. Adams County is a community of opportunity, with a range of housing choices, a diverse resident base, and lifestyles ranging from the urban/suburban to rural country living. For some residents, living in Adams County is not without its tradeoffs and challenges, particularly for renters, residents with a housing subsidy, households earning less than \$25,000 a year, Hispanic households, African American households, families with children, and people with disabilities.

- Many of the differences in housing choice and experience are correlated with household income and housing situation—and these often overlap with race, ethnicity, and familial status. Overall, one in five Adams County respondents struggle to pay their rent or mortgage, and renters are more likely than homeowners to struggle (43% v. 12%). Hispanic respondents, those with large families, children under 18, persons with a disability, and/or residents who are Native American are more likely than the average Adams County respondent to struggle to pay housing costs.
- Overall, 30 percent of Adams County survey respondents rate the condition of their home “fair” or “poor”. More than half of those are precariously housed, have household incomes less than \$25,000, are African American, or are renters. In

contrast, only 10 percent of homeowners and three percent of those with household incomes of \$100,000 or more say their homes are in fair or poor condition.

- In the last five years, one in eight (13%) Adams County survey respondents experienced displacement—that is, had to move out of a home in Adams County when they did not want to move. Households with incomes less than \$25,000, respondents who are currently precariously housed, and renters all have displacement rates more than double the county rate (26% or more). Although not as pronounced, at least one in five Hispanic (22%), African American (20%), and Native American (20%) respondents report being displaced in Adams County in the past five years.
- Of the respondents whose household includes a member with a disability, a very large proportion—78 percent—have accessibility needs in the home or to access the home. Nearly three in 10 (28%) live in a home that does not meet the accessibility needs of their household member with a disability.
- For those respondents who would move if they had the opportunity, the most typical barriers reflect market realities (i.e., lack of housing to rent or buy that the respondent can afford) and a lack of resources to pay the costs required to move into a new rental unit, especially deposits, application fees, and moving expenses. This compounds the difficulty experienced finding an affordable home to rent and is likely a significant barrier keeping those who are precariously housed—doubled up, staying with friends and family, or homeless—in their tenuous situation.
- When asked to prioritize the housing and community development outcomes most important to them, residents prioritized safety, preserving affordable housing, and quality neighborhood public schools.

Demographic patterns. Adams County has some of the most racially, ethnically, and economically diverse neighborhoods in the Metro Denver region. Yet this was not always the case: early settlement patterns were marked by exclusion of people of color, immigrants, and lower income households. The county overall is now a “majority minority” community, with Federal Heights, Brighton, Thornton being the most ethnically diverse.

- Most households in the county and incorporated cities within the county are “family” households—largely comprised of married couple households with and without children. Single mother households make up 8 percent of households overall.
- The percentage of people living in poverty in Adams County has declined since 2010 and is now 12 percent. Poverty varies by race and ethnicity but is relatively low for all racial and ethnic groups, ranging between 7 and 11 percent. This is not true for single mothers, where one in five live in poverty.
- African Americans and persons of Hispanic descent have a median income that is 75 percent of the median income of non-Hispanic White households.

- A measure of segregation—the Dissimilarity Index, or DI—shows low levels of segregation for all groups in Adams County except African Americans, who face moderate levels of segregation.
- It is important to note that the data in this section are based on a pre-COVID-19 economy. The most recent data at the Census tract, jurisdiction, and county level are from the 2018 American Community Survey (ACS) and it is likely that these data provide an overly optimistic view of conditions given current circumstances. A special survey (“household pulse”) was conducted the week of June 4 to assess COVID-19 effects but it is only available at the state level.

Access to opportunity. Analysis in this section points to gaps in access to opportunity in:

- **Education.** Hispanic and African American students tend to have lower high school graduation rates, and lower academic achievement levels than non-Hispanic White students. In most school districts, the students with the lowest graduation rates are students who have a disability and students experiencing homelessness.
- **Employment outcomes.** Education gaps directly translate into employment gaps, particularly for the Hispanic population. Hispanics have some of the lowest shares of college graduates across jurisdictions: while the share of college graduates across the county is 22 percent, it is only 9 percent for Hispanics. The share of college graduates is higher for African Americans; however, they have the highest unemployment rate in the county.
- **Broadband access.** While 95 percent of households with income above \$75,000 have an internet subscription, 85 percent of households earning between \$20,000 and \$75,000, and only 68 percent of households earning below \$20,000 have an internet subscription.
- **Access to transportation.** While survey results indicate that generally residents are satisfied with their transportation situation, the underlying access to transit stops is limited—particularly with public transportation users.
- **Access to healthy food.** Twenty tracts in the county are identified as food deserts. One in four USDA food deserts in the county are Census tracts with a concentration (greater than 1.5 times the county proportion) of African American residents and 35 percent are Census tracts with a concentration of Hispanic residents. The average poverty rate in a food desert is 18 percent compared to 10 percent in tracts not designated as a food desert.

Disproportionate housing needs. The data analysis in this section of the AI finds the most severe disproportionate housing needs in:

- **Severe cost burden.** Hispanic households, Asian households, and, especially African American households, are much more likely to be severely cost burdened than non-Hispanic White households. Based on this measure, these households are 1.5 to 2 times as likely to experience eviction and homelessness due to inability to keep up with their rent or mortgage payments.
- **Doubling up.** A common response to managing rising housing costs is doubling up. According to the resident survey, more than 25 percent of Adams County households are doubled up—defined as someone over the age of 18 living in the survey respondent’s home because the other adult cannot afford to live on their own. The highest rates of doubling up occur for Native American residents, residents who have a household member with a disability, and/or large families.
- **Homeownership rates.** Large gaps in homeownership exist for African American and Hispanic households in Adams County; moderate gaps exist for Asian households. Forty-two percent of African Americans own their homes compared to 73 percent of non-Hispanic White households. The ownership rate for Hispanic households is 53 percent and, for Asian households, 62 percent. African American ownership rates vary widely among jurisdictions, with the lowest in Federal Heights (10%) and the highest in Brighton (65%). Asian ownership rates also vary by jurisdiction, while Hispanic ownership rates are more uniform.
- **Displacement.** Overall, 13 percent of Adams County households report moving in the last 5 years against their choice. Hispanic (22%), African American (20%), and Native American (20%) households experienced higher rates of displacement than Adams County households overall. Hispanic households were more likely to have been displaced due to lost job/hours reduced and eviction due to being behind on the rent, while residents with disabilities and households with children were most likely to be displaced because their rent increased. Households with children were also the most likely to have been displaced due to “living in unsafe conditions (e.g., domestic assault, harassment)” —this experience affected 22 percent of survey respondents with children who experienced displacement.
- **Access to mortgage loans.** Discrepancies exist in the ability to access a mortgage loan and achieve homeownership. Loan applications submitted by Black or African American applicants resulted in a mortgage loan denial 27 percent of the time. Hispanic applicants were denied 20 percent of the time. This compares to 14 percent for non-Hispanic White applicants.

More concerning is the high proportions of high-cost loans that African American and Hispanic borrowers received in 2018—an area to monitor. The disparities in subprime loans and predatory lending during the Great Recession disproportionately affected African American and Hispanic owners and led to high rates of foreclosures.

The resident survey, the findings of which are discussed in detail in Section II, reveals a persistent pattern of disproportionate housing needs for African American residents in particular—including the experience of displacement and displacement, residing in a high crime neighborhood, and experiencing discrimination in accessing housing.

Fair housing environment. This section of the AI assesses private and public barriers to housing choice within the context of existing fair housing laws, regulations, and guidance.

- According to the community survey conducted for this AI, African American headed households and households using a housing subsidy (e.g., a Housing Choice Voucher holder) were the most likely to believe they had experienced housing discrimination when looking for housing in the county in the past 5 years.
- HUD reported 62 fair housing complaints in Adams County between 2014 and 2018. Most complaints submitted to HUD during this period affected individuals with physical disabilities.
- The regulatory review of Adams County’s zoning and land use policies found areas where the code could be clarified or strengthened to avoid fair housing challenges. The areas we recommend for priority action include:
 - Revise the definition of family used in the Adams County development standards to acknowledge two person households and to eliminate the restriction of college students from cohabitating. Occupancy regulations for health and safety should be used as a more inclusive approach to limit the number of unrelated persons (including students) cohabitating.
 - Remove distinctions between group homes for protected classes (e.g., developmentally disabled and seniors) in the Adams County development standards and regulations. Isolating these groups and requiring a discretionary review process for their approval is considered differential treatment. Most communities regulate group homes based on occupancy limits and level of care—not individual occupant characteristics.
 - Eliminate the discretionary review process in Adams County for group homes that serve protected classes (serving six or fewer persons). Conditional use permits which require public hearings and notice requirements may increase public awareness and increase “NIMBY-ism” (not in backyard syndrome) for group homes for persons who are developmentally disabled and/or seniors.
 - Include group homes as a permitted use in the Adams County Transit Oriented Development Overlay mixed use district. Persons living in group environments often have lower car use and would benefit from living in close proximity to transit.

- Remove exclusionary language in the code—specifically, in the stated purpose for residential districts as indicated on page 24 of this section.
- Best practices that are not as critical in nature but would be beneficial during the update of the code or in text amendments include:
 - Include a definition of “disability” or “person with disabilities” that aligns with Fair Housing Amendments Act (FHAA) and Americans with Disabilities Act (ADA) in the development code. In defining disability, it is important to include the broad definition that has been interpreted by the courts to apply to the Fair Housing Act (FHA), which includes persons in recovery from substance abuse challenges and persons with HIV/AIDS.
 - Establish a standard process for reasonable accommodation requests in the development code.
 - Consider designating mixed-use districts as base zone districts, as opposed to overlays, to minimize procedural delays and public hearings.
 - Implement residential unit classifications, zone districts, and site design requirements for alternative housing types (e.g. tiny homes, cottage housing, courtyard development, micro-homes, and cooperative housing).
 - Include a statement in the purpose of the zoning ordinance that discusses fair housing law or include a cross-reference that identifies the adopted planning documents that discuss and contain policies related to fair housing.

Impediments and Fair Housing Action Plan

Adams County is unique in many ways. It offers a diversity of geographic contexts, cultural richness, racial and ethnic diversity, and relatively affordable neighborhoods—oftentimes to residents who are displaced from other counties and cities with restrictive growth policies and high cost housing. Yet, as discussed in the individual report sections in this AI, the county is not without disparities in housing needs and access to opportunity. As the county continues to grow, it will be important to view housing and community services planning through an equity lens to expand housing access and economic growth for all.

2020 impediments. The fair housing impediments found in this AI update include:

Shortage of affordable, accessible housing units. The shortage in supply of affordable, accessible housing units in the county disproportionately impacts low income households—primarily minorities—households with individuals living with a disability or seniors, and single mother households, many of which are on fixed or limited incomes.

Discrimination in rental transactions. Disproportionate shares of African American headed households and households with at least one person living with a disability experience housing discrimination based on the community survey conducted for this AI

and fair housing complaint data provided by the U.S. Department of Housing and Urban Development (HUD). Minority groups—specifically African American and Hispanic residents—are overrepresented in Housing Choice Voucher waitlists and in subsidized housing overall, which suggests these groups may not be receiving fair treatment in the private market.

Barriers to homeownership. Large gaps in homeownership exist for African American and Hispanic households in Adams County; moderate gaps exist for Asian households. Differential treatment of African American and Hispanic households in lending practices further highlights the gaps in homeownership these groups experience in Adams County. African American and Hispanic households applying for mortgage loans to purchase homes in Adams County are more likely than non-Hispanic White borrowers to be offered subprime loans. They also experience higher rates of denials due to poor credit history or high debt to income ratios.

Hispanic applicants, in particular, show very large differences in denials for home improvements loans. From a policy perspective, Hispanic households in Adams County may be most at risk for high-cost loans (predatory, credit cards) to help with needed home improvements, and would benefit from publicly-assisted home improvement grants and low cost loans.

Lack of resources to address poor housing conditions. Based on the resident survey conducted for this AI, 30 percent of Adams County survey respondents rate the condition of their home “fair” or “poor”. More than half (53%) of African American residents rated the condition of their home “fair” or “poor,” followed by 45 percent of Hispanic households, 44 percent of American Indian households, and 42 percent of households with at least one person living with a disability.

Disparate access to opportunity. As detailed in Section IV of this AI, there is not one self-evident barrier to opportunity that impacts all geographic areas of the county and racial and ethnic groups. However, there are a collective group of access issues that are evident when access to opportunity is examined comprehensively. Barriers to transportation, adequate workplaces, quality schools, recreational resources, and health services compound upon each other to create disparate access to opportunity among different resident groups, primarily African American and Hispanic residents in Adams County. For example, education gaps directly translate into employment gaps, particularly for the Hispanic population.

Limited zoning code and land use regulations. As detailed in Section VI of this report, there are many areas of the county’s zoning code that could be improved to facilitate affordability and more housing type diversity.

In brief, current zoning and land use regulations in Adams County are due for an update (based on a 10-year schedule). Adams County’s zoning code contains traditional suburban

zoning regulations, as expected, and could benefit from the incorporation of more flexible definitions and the allowance of more contemporary land use patterns by right. Additionally, the incorporation of streamlined procedures for the development of affordable housing and the reasonable accommodation process could be improved in the individual jurisdictions zoning and land use regulations (e.g., impact fee reductions, expedited permitting, flexible administrative review procedures).

Fair Housing Action Plan

The recommended fair housing action plan (FHAP) for the county follows. These action items focus on what Adams County can reasonably do to address the impediments and affirmatively further fair housing (AFFH) given its staff and financial capacity. Other public entities, nonprofit, and private sector partners can play a role and buttress the county's AFFH activities.

The action plan is contained in the matrix on the following page, which links the action items to the identified impediments, potential partners, timeline and outcomes.

**Figure I-1.
2020 Fair Housing Action Plan**

| # Fair Housing Actions | Fair Housing Issues/Impediments | Responsible Party | Metrics and Milestones |
|---|---|---|--|
| <p>1 Maintain a regular 10-year schedule for updating the county and individual jurisdictions' comprehensive plans and respective land use codes. Adams County and Federal Heights will be due for an update within the next five years. Updating the comprehensive plan and land use codes on a regular schedule promote the inclusion of community input in the development regulations and built form in their community as well as keeping up to date with best practices in land use planning that can often promote affordability and eliminate barriers to housing development.</p> | <p>Shortage of affordable, accessible housing</p> <p>Limited zoning code and land use regulations</p> | <p>Adams County and respective jurisdictions</p> | <p>Consider the land use recommendations presented in the Fair Housing Environment section of this AI as the county moves forward with the comprehensive planning process Advancing Adams County in 2021.</p> <p>Based on a 10-year update schedule Adams County and jurisdictions are due for updates based on the following milestones: (last updated/update due)</p> <ul style="list-style-type: none"> - Adams County 2012/2022 - Federal Heights 1997/overdue - Bennett 2015/2025 - Brighton 2016/2026 - Thornton and Westminster update in progress |
| <p>2 Collaborate regionally to develop resources and training for financial literacy, focused specifically around disproportionate impacts and housing challenges identified in this AI (e.g., credit scores, debt to income ratio, refinancing).</p> | <p>Discrimination in rental transactions</p> <p>Barriers to homeownership</p> | <p>Adams County, respective jurisdictions, and nonprofit partners</p> | <p>Identify lead organizations to act as the host for financial literacy training and develop a suite of recourses that address Adams County specific needs identified in Section V of this AI.</p> |
| <p>3 Investigate funding sources to provide grants for home improvement, specifically to groups with high rates of denials for home improvement loans. Pair home improvement grant programming with financial literacy training advised under action item 3. Actively discourage the use of predatory lending products, particularly among the most vulnerable populations in the community.</p> | <p>Lack of resources to address poor housing conditions</p> | <p>Adams County and nonprofit partners</p> | <p>Explore resources available to provide grants for home improvement paired with affirmatively-marketed education around predatory lending products. If implemented, have a pilot program in operation within the next five years.</p> |

Fair Housing Action Plan (Continued)

| # | Fair Housing Actions | Fair Housing Issues/Impediments | Responsible Party | Metrics and Milestones |
|---|---|--|--|---|
| 4 | Continue participation in the Metro Downpayment Assistance program and consider affirmatively marketing to protected classes that are underrepresented in homeownership. Potentially pair downpayment assistance programming with financial literacy training identified under action item 3. | Barriers to homeownership | Adams County and nonprofit partners | Explore possible funding sources to determine the development of an affirmative marketing plan and plan to provide homeowner assistance with forms/applications targeting under-represented residents. |
| 5 | Expand resources for the development of affordable housing in the county. Consider establishing a permanent Housing Trust Fund with a source of funding that is tied to inflation. | Shortage of affordable, accessible housing Lack of resources to address poor housing conditions | Adams County and respective jurisdictions | Explore funding opportunities and partnerships between Adams County and local jurisdictions to establish the stability and predictability of the Housing Trust Fund as a regional resource. |
| 6 | Inventory public land and other resources that may contribute to attracting or constructing affordable housing in the county. | Shortage of affordable, accessible housing | Adams County | Develop an inventory of publicly owned land and conduct a feasibility assessment to determine equitable and strategic use of public lands to affirmatively further fair housing. |
| 7 | Carry forward response and recovery efforts related to the impacts of the COVID-19 pandemic. Adams County has partnered with Maiker Housing Partners to launch the Adams County COVID-19 Short-Term Rental and Mortgage Assistance Relief Fund. Continue efforts to keep Adams County residents housed as the economic fallout of the pandemic creates more acute housing challenges that disproportionately impact protected classes. | Discrimination in rental transactions Barriers to homeownership Lack of resources to address poor housing conditions | Adams County, respective jurisdictions, and nonprofit partners | Leverage ongoing working groups formed for the response and recovery efforts related to COVID-19 to ensure an equitable distribution of resources and opportunity throughout the recovery efforts. Explore the feasibility of developing a marketing campaign to affirmatively-market to group disproportionately impacted by the pandemic. |

Fair Housing Action Plan (Continued)

| # | Fair Housing Actions | Fair Housing Issues/Impediments | Responsible Party | Metrics and Milestones |
|---|---|--|---|--|
| 8 | <p>Expand internet access in the county, specifically for low income households. Access to opportunity including employment, quality education, and health care depend heavily on strong internet access throughout the COVID-19 pandemic.</p> | <p>Disparate access to opportunity</p> | <p>Adams County, respective jurisdictions, and nonprofit partners</p> | <p>Explore existing low barrier internet access and funding sources for improved internet access. Assess technology and infrastructure needs to address disparities in internet access (e.g., personal device limitations, fiber optic infrastructure, rental property wiring issues). Compile existing and proposed resources for distribution countywide through partner organizations and community networks.</p> |

SECTION II.

COMMUNITY ENGAGEMENT SUMMARY

Section II.

Community Engagement Summary

This section reports the findings from the community engagement conducted to support Adams County's 2020-2024 Analysis of Impediments to Fair Housing Choice. It explores residents' housing choices and preferences, challenges and experiences with displacement and housing discrimination, and access to opportunity.

The Root team is grateful to the residents who shared their experiences and perspectives with fair housing and access to opportunity by participating in the community engagement. The community engagement process included:

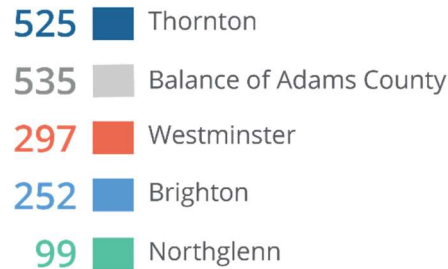
- A resident survey available in English and Spanish, in paper format and online;
- A resident focus group conducted in English and Spanish hosted by Growing Home and Maiker Housing Partners;
- Booths with engagement activities in English and Spanish and Spanish interpretation at the 2019 Adams County Cares Day and the Thornton Harvest Fest; and
- Stakeholder interviews including participants representing Adams County Education Consortium, Adams County Workforce and Business Center, Adams 12 Five Star Schools, CASA of Adams & Broomfield Counties, Family Tree, and Maiker Housing Partners.

ADAMS COUNTY

COMMUNITY ENGAGEMENT BY THE NUMBERS



WHERE RESPONDENTS LIVE



WHO PARTICIPATED IN THE SURVEY?

HOUSING STATUS



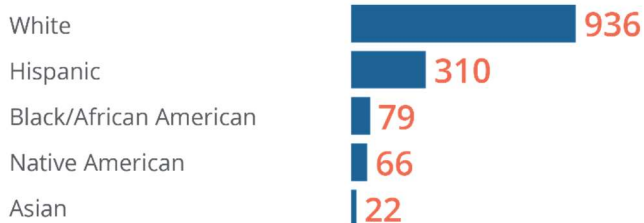
HOUSEHOLD SIZE



HOUSEHOLD INCOME



IDENTIFIED AS



637 had a child under 18



472 had a household member with a disability



227 is a senior (age 65+)



321 live with any adult family members



171 live alone



131 are single parents (no other adults in home)



94 live in publicly-assisted housing



136 are single parents living with other adult family/roommates



77 live with roommates/friends

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Explanation of terms. The terms used throughout this section include:

- “Precariously housed” includes residents who are currently homeless or living in transitional or temporary/emergency housing and residents who are “staying with friends/family” —people who live with friends or family but are not themselves on the lease or property title. These residents may (or may not) make financial contributions to pay housing costs or contribute to the household exchange for housing (e.g., childcare, healthcare services).
- “Disability” indicates that the respondent or a member of the respondent’s household has a disability of some type—physical, mental, intellectual, developmental.
- “Housing subsidy” refers to a respondent whose household’s housing costs are subsidized by a housing voucher (e.g., Section 8/Housing Choice Voucher) or whose household lives in a building where their rent is based on their income. This includes LIHTC buildings, project-based Section 8, deed-restricted ownership products, and any other place-based housing subsidies.

Geographic note. Throughout this section, survey data reported for Balance of County exclude residents of Brighton, Northglenn, Thornton, and Westminster. Data for Adams County are inclusive of all residents of the county, including those living in Brighton, Northglenn, Thornton, and Westminster.

Sampling note. The survey respondents do not represent a random sample of the Adams County population. A true random sample is a sample in which each individual in the population has an equal chance of being selected for the survey. The self-selected nature of the survey prevents the collection of a true random sample. Important insights and themes can still be gained from the survey results however, with an understanding of the differences of the sample from the larger population.

At the time of the survey (January-February 2020), respondents’ employment situation included:

- Employed full time (47%);
- Retired (17%);
- Employed part time (10%);
- Unemployed (7%);
- Disability benefit recipient (7%);
- Self-employed (6%);

- Homemaker (5%);
- Temporary/odd jobs (3%);
- Underemployed/looking for a better job (2%); and
- Full-time student (2%).

Sample size note. When considering the experience of members of certain groups in Adams County or within Brighton, Northglenn, Thornton, or Westminster, the sample sizes are too small ($n < 40$ respondents) to express results quantitatively. In these cases, we describe the survey findings as representative of those who responded to the survey, but that the magnitude of the estimate may vary significantly in the overall population (i.e., large margin of error). Survey data from small samples are suggestive of an experience or preference, rather than conclusive.

Framework for presenting results. Findings from the survey are summarized for segments of the respondent population—e.g., income range, household characteristics—where sample sizes are sufficient for reporting.

Survey timing and COVID pandemic. It is important to note that the resident survey that was conducted during January and February 2020, in the early stages of the of the COVID-19 outbreak. As such, the survey primarily reflects pre-COVID economic conditions and should be considered a baseline measure of resident needs. The housing situation and needs of residents during that period can help inform short- and long-term policy responses to stabilize households and preserve and add to the supply of affordable housing.

Primary Findings

Adams County is a community of opportunity, with a range of housing choices, a diverse resident based, and lifestyles ranging from the urban/suburban to rural country living. For some residents, living in Adams County is not without its tradeoffs and challenges, particularly for renters, residents with a housing subsidy, households earning less than \$25,000 a year, Hispanic households, African American households, families with children, and people with disabilities.

- Many of the differences in housing choice and experience are correlated with household income and housing situation. Overall, one in five Adams County respondents struggle to pay their rent or mortgage, and renters are more likely than homeowners to struggle (43% v. 12%). Hispanic respondents, those with large families, children under 18, disability, or who are Native American are more likely than the average Adams County respondent to struggle to pay housing costs.

- Overall, 30 percent of Adams County survey respondents rate the condition of their home “fair” or “poor”. More than half of those are precariously housed, have household incomes less than \$25,000, are African American, or are renters. In contrast, only 10 percent of homeowners and three percent of those with household incomes of \$100,000 or more say their homes are in fair or poor condition.
- In the last five years, one in eight (13%) Adams County survey respondents experienced displacement—that is, had to move out of a home in Adams County when they did not want to move. Households with incomes less than \$25,000, respondents who are currently precariously housed, and renters all have displacement rates more than double the county rate (26% or more). Although not as pronounced, at least one in five Hispanic (22%), African American (20%), and Native American (20%) respondents report being displaced in Adams County in the past five years.
- Of the respondents whose household includes a member with a disability, 78 percent have accessibility needs in the home or to access the home. Nearly three in 10 (28%) live in a home that does not meet the accessibility needs of their household member with a disability.
- For those respondents who would move if they had the opportunity, the most typical barriers reflect market realities (i.e., lack of housing to rent or buy that the respondent can afford) and a lack of resources to pay the costs required to move into a new rental unit, especially deposits, application fees, and moving expenses. This compounds the difficulty experienced finding an affordable home to rent and is likely a significant barrier keeping those who are precariously housed—doubled up, staying with friends and family, or homeless—in their tenuous situation.
- When asked to prioritize the housing and community development outcomes most important to them, Adams County Cares Day attendees and Thornton Harvest Fest attendees prioritized safety, preserving affordable housing, and quality neighborhood public schools.

Current Housing Choice

This section explores residents’ housing preferences, including the factors most important to them when they chose their current housing.

Most important factors in choosing current home. The greatest proportion of respondents identify “cost/I could afford it” as the most important factor they considered when choosing their current home, and this does not vary by where they live, whether they rent or own, their income, or their personal or household characteristics. In Adams County, the top five factors most important to the greatest share of survey respondents include:

- “Cost/I could afford it”;

- “Like the neighborhood”;
- “Needed somewhere to live and it was available;”
- “Close to family/friends”; and
- “Like the type of home/apartment.”

The importance of certain preference-based qualities—liking the neighborhood, close to family/friends, proximity to work, number of bedrooms—varied by tenure, household income, and household composition. For example “quality public schools/school district” was the 6th most important factor for households with children under the age of 18, and among the top 10 factors identified by the greatest proportion of Hispanic respondents, Native American respondents, Thornton residents, respondents with household incomes less than \$25,000, and households with incomes greater than \$100,000. In the resident focus group, participants shared similar values as survey respondents—affordability, liking the neighborhood and community.

- *“I love the old and the new—tiny shops, donuts, restaurants. We’re missing a grocery store and we are actively pursuing that. When I roll around people are nice.” (Resident focus group participant)*
- *“I live near 72nd and Lowell. I have a good landlord, my place is comfortable with a garden, close to my kids’ schools. I’m concerned about bullying in schools.” (Resident focus group participant)*

Indicators of housing choice difficulties. Not all of the most important factors reflect personal preferences; some signal difficulties certain households experience when finding a place to live. These factors are not personal preferences for qualities about the place where they live, but indicators of a tight housing market, income constraints, and other barriers some households experience when seeking housing. These include:

- **Needed somewhere to live and it was available.** After cost, this is the factor identified by the 2nd highest share of respondents including those who:
 - Live in Northglenn or the Balance of County;
 - Rent, are precariously housed, have a housing subsidy, or a household income less than \$25,000;
 - Are Hispanic, African American, Native American, have children under 18, have a large family, or are disabled or a member of their household has a disability.
- **Landlord would rent to me despite bad credit/past evictions/history.** While not among the top five most important factors, “landlord would rent to me despite

bad credit, past evictions, history” is a top 10 consideration for renters, Hispanic renters, African American renters, renters with household incomes less than \$25,000, and households that include a member with a disability.

Figures II-1, II-2 and II-3 present the top five responses by jurisdiction, housing situation, household income, and selected respondent characteristics.

Figure II-1.
Most Important Factors in Choosing Current Home, by Jurisdiction

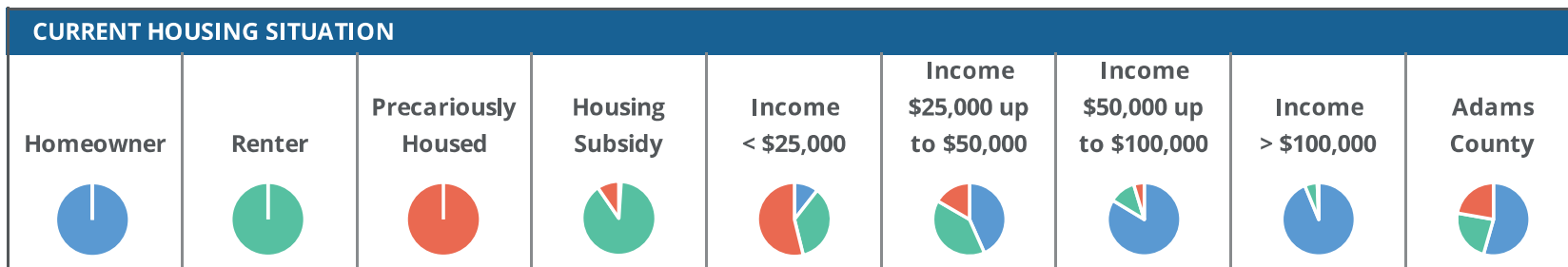
■ Homeowner
 ■ Renter
 ■ Precariously Housed

| CURRENT HOUSING SITUATION | | | | | | |
|---------------------------|---|---|---------------------------------|---|--|---|
| | Brighton | Northglenn | Thornton | Westminster | Balance of County | Adams County |
| | | | | | | |
| TOP 5 | MOST IMPORTANT FACTORS IN CHOOSING CURRENT HOME (TOP 5 ANSWERS) | | | | | |
| 1 | Cost/I could afford it | Cost/I could afford it | Cost/I could afford it | Cost/I could afford it | Cost/I could afford it | Cost/I could afford it |
| 2 | Like the neighborhood | Needed somewhere to live and it was available | Like the neighborhood | Like the neighborhood | Needed somewhere to live and it was available | Like the neighborhood |
| 3 | Close to family/friends | Close to work/job opportunities | Like the type of home/apartment | Needed somewhere to live and it was available | Like the neighborhood | Needed somewhere to live and it was available |
| 4 | Like the type of home/apartment | Close to family/friends | Close to family/friends | Like the type of home/apartment | Close to family/friends | Close to family/friends |
| 5 | (TIE) Close to work/job opportunities AND Number of bedrooms | Number of bedrooms | Number of bedrooms | Close to work/job opportunities | (TIE) Close to work/job opportunities AND Number of bedrooms | Like the type of home/apartment |

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-2. Most Important Factors in Choosing Current Home, by Housing Situation and Income

■ Homeowner
 ■ Renter
 ■ Precariously Housed



TOP 5

| MOST IMPORTANT FACTORS IN CHOOSING CURRENT HOME (TOP 5 ANSWERS) | | | | | | | | | |
|---|---------------------------------|---|---|---|---|---|---------------------------------|---------------------------------|---|
| 1 | Cost/I could afford it | Cost/I could afford it | Cost/I could afford it | Cost/I could afford it | Cost/I could afford it | Cost/I could afford it | Cost/I could afford it | Cost/I could afford it | Cost/I could afford it |
| 2 | Like the neighborhood | Needed somewhere to live and it was available | Needed somewhere to live and it was available | Needed somewhere to live and it was available | Needed somewhere to live and it was available | Close to family/friends | Like the neighborhood | Like the neighborhood | Like the neighborhood |
| 3 | Like the type of home/apartment | Close to family/friends | Close to family/friends | Number of bedrooms | Close to family/friends | Like the neighborhood | Like the type of home/apartment | Like the type of home/apartment | Needed somewhere to live and it was available |
| 4 | Large yard/size of yard | Number of bedrooms | Low crime rate/safe | Close to family/friends | Like the neighborhood | Needed somewhere to live and it was available | Close to work/job opportunities | Close to work/job opportunities | Close to family/friends |
| 5 | Close to work/job opportunities | (TIE) Close to work/job opportunities AND Landlord accepts pets | Close to work/job opportunities | Landlord takes Section 8 | Low crime rate/safe | Number of bedrooms | Close to family/friends | Number of bedrooms | Like the type of home/apartment |

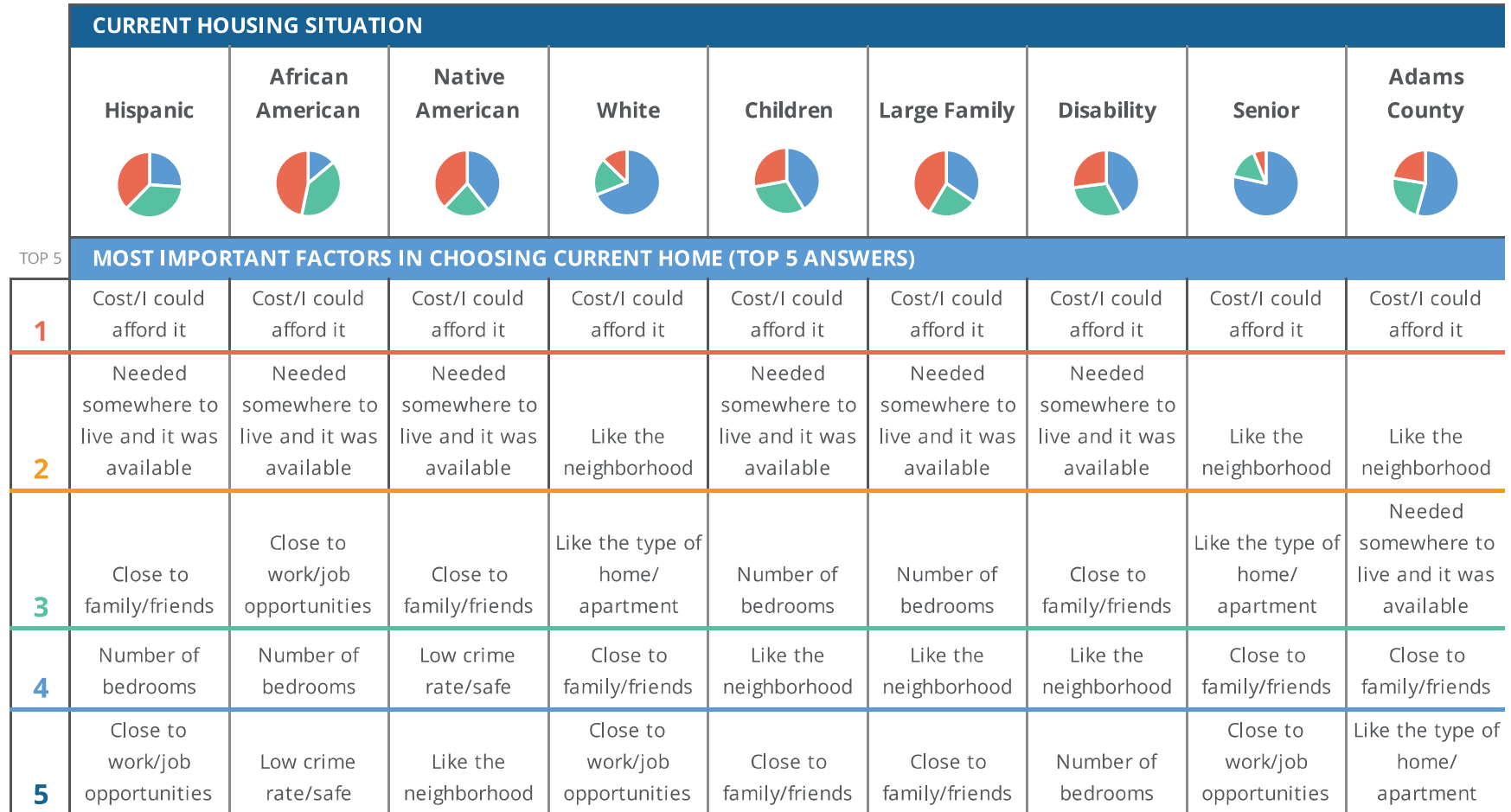
Note: Subsidized housing includes all forms of publicly supported housing.

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-3.

Most Important Factors in Choosing Current Home, by Select Respondent Characteristics

■ Homeowner
 ■ Renter
 ■ Precariously Housed



Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Desire to Move

Figures II-4, II-5, and II-6 present the proportion of respondents who would move if they had the opportunity and the top five reasons why they want to move. Overall, 55 percent of Adams County survey respondents would move if they had the opportunity. The share who want to move ranges from a high of 90 percent of those who are precariously housed, 82 percent of African American respondents, and 79 percent of those with incomes less than \$25,000 to 35 percent of homeowners and 30 percent of seniors.

Why do residents want to move? For most respondents who would move if they had the opportunity, moving to more affordable or less expensive housing is a top factor, followed by moving to a larger home or a place with more bedrooms, and living with fewer people/getting my own place. Homeownership and moving to a different neighborhood within Adams County round out the top five reasons why respondents would move. While the order differed, these factors are similar in each of the jurisdictions and among most resident groups.

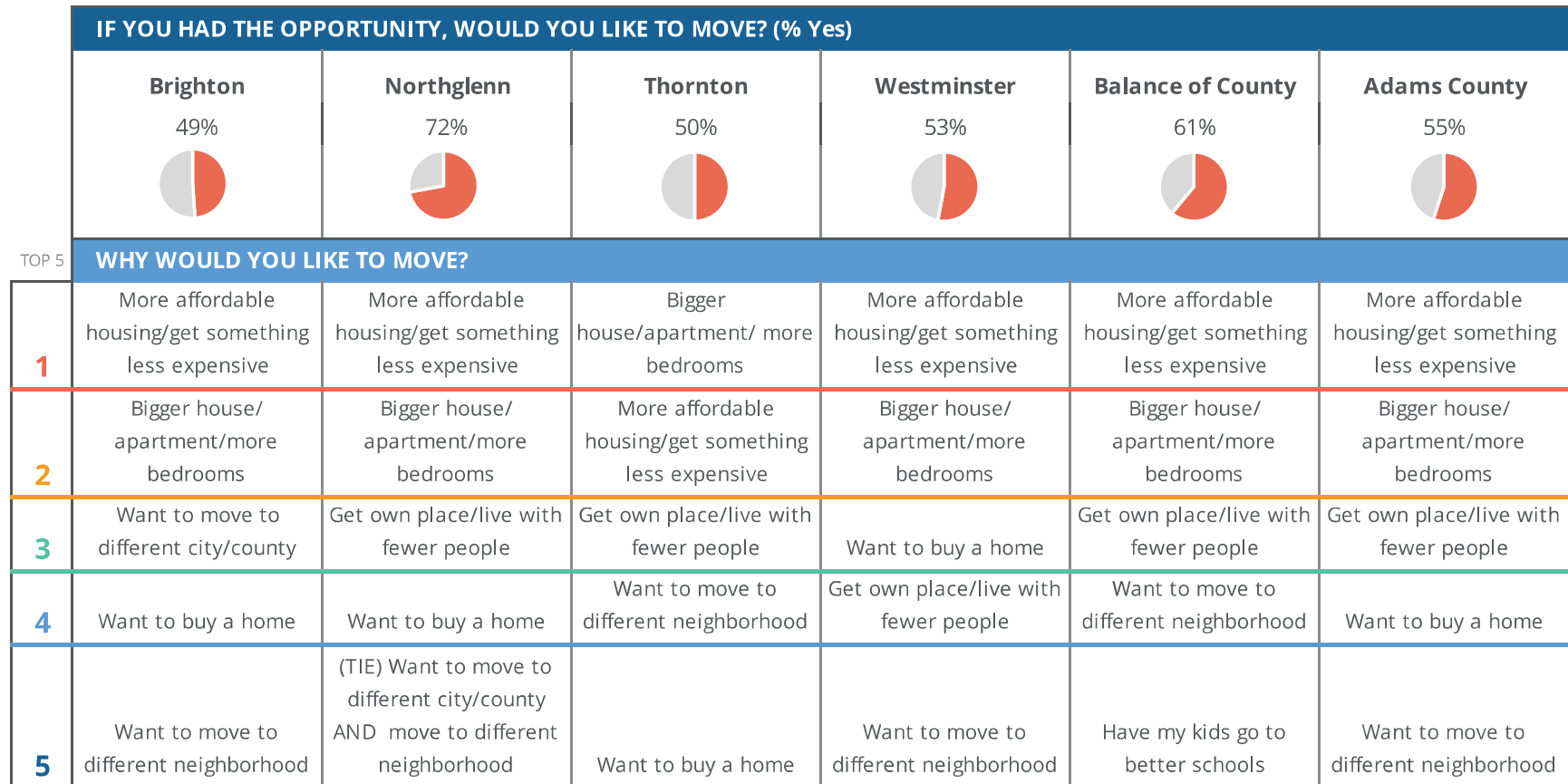
However, some key differences from Adams County overall in the top five reasons to move are apparent:

- **Have my kids go to better schools.** Top five reason to move for households with children under 18, large families, precariously housed respondents, households with incomes greater than \$100,000
- **Crime/safety reasons.** Top five reason to move for renters, respondents with a housing subsidy,
- **One level house or first floor unit (no stairs).** Top five reason to move for seniors, homeowners, and households with incomes of \$25,000 up to \$50,000.
- **Want to move to a different city/county.** Top five reason to move for Northglenn residents, households with incomes greater than \$100,000, White respondents, and seniors.
- **Smaller house/apartment/downsize.** Top five reason for seniors.

Examples of other reasons for wanting to move include:

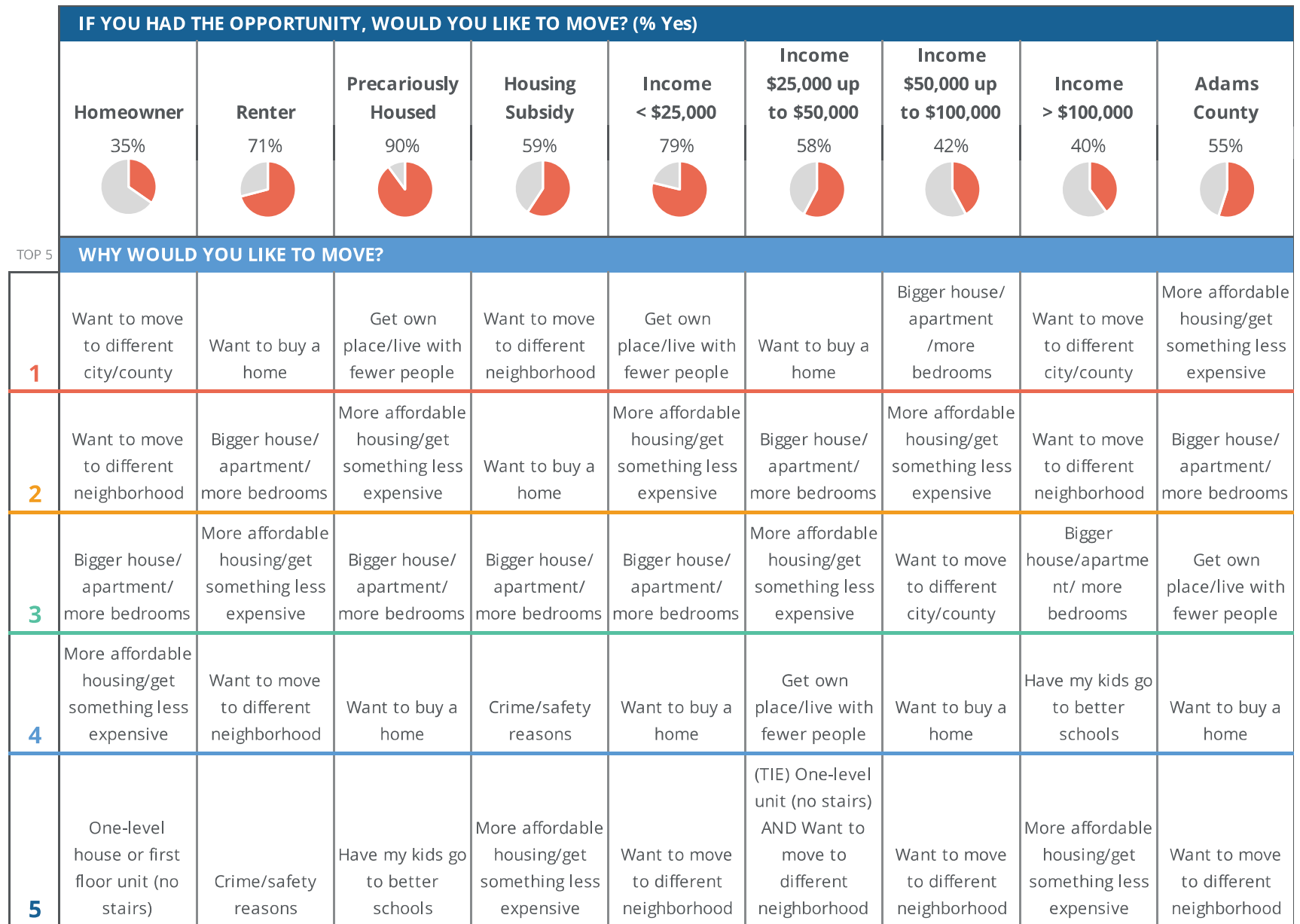
- *“Living with family makes it hard for me to be a parent to my 3 children, and they need stability.” (Resident survey respondent)*
- *“Extremely high taxes and very poor water quality.” (Resident survey respondent)*

Figure II-4.
Desire to Move and the Top 5 Reasons Why, by Jurisdiction



Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-5. Desire to Move and the Top 5 Reasons Why, by Housing Situation and Income



Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-6.
Desire to Move and the Top 5 Reasons Why, by Select Respondent Characteristics



Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

What prevents them from moving? By and large, economic and market factors are the primary reasons why those who want to move have not yet moved. As with the desire to move, the top five reasons why people haven't moved are very similar among the jurisdictions to the top five for Adams County—can't afford to live anywhere else, can't afford to buy where I want to live, can't afford deposits for new rental, can't cover the rent on my income/landlords want 3X the rent, and can't pay moving expenses.

As with desire to move, some key differences from Adams County overall in the top five reasons to move are apparent:

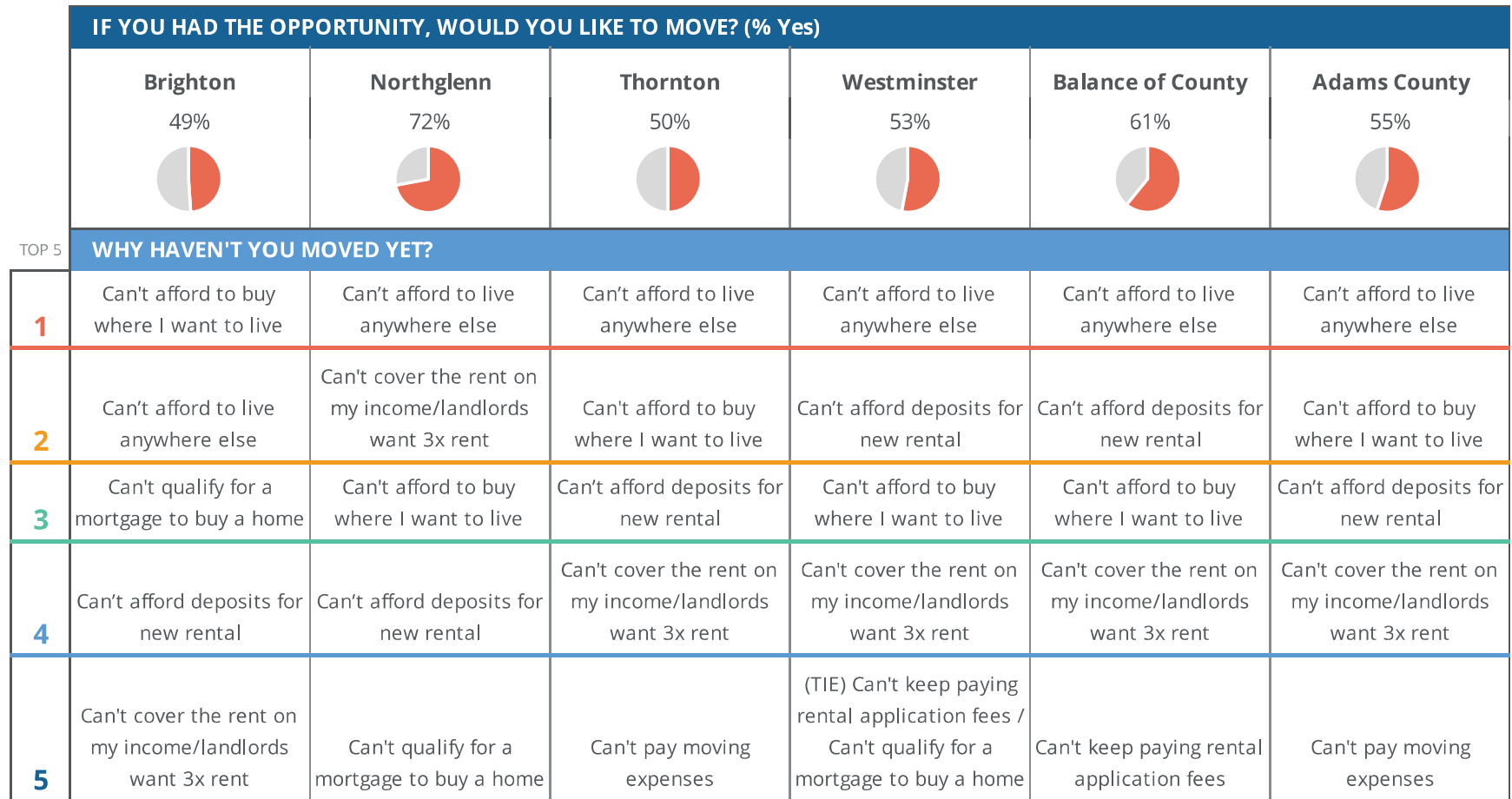
- **Can't qualify for a mortgage to buy a home.** Top five for renters, households with children, large families, households with incomes of \$25,000 up to \$50,000, households with incomes of \$50,000 up to \$100,000, Brighton residents, Northglenn residents, Westminster residents,
- **Can't keep paying rental application fees.** Top five for precariously housed residents, respondents with household incomes less than \$25,000, respondents with a housing subsidy, Hispanic respondents, African American respondents, Native American respondents, Westminster respondents, Balance of County respondents,
- **Can't find a landlord to rent to me due to my credit, eviction or foreclosure.** Top five reason for African American respondents,
- **Have submitted applications but haven't secured housing.** Top five reason for precariously housed,
- **Can't find one-level house or first floor unit (no stairs).** Top five reason for seniors.
- **Family/friends are here.** Top five reason for homeowners and seniors.
- **Job is here.** Top five reason for homeowners and respondents with household incomes of \$50,000 up to \$100,000.
- **Can't find a better place to live.** Top five reason for homeowners.

Other reasons why respondents who want to move have not yet moved include:

- *"I'm paying \$2,000 a month for rent— we didn't have other options with enough bedrooms. Its WAY to much rent. We are looking for something more affordable, but haven't found anything. We need more affordable housing!" (Resident focus group participant)*
- *"Cost of living and rents/mortgages are getting way high and my disability only affords me so much and runs out too fast." (Resident survey respondent)*

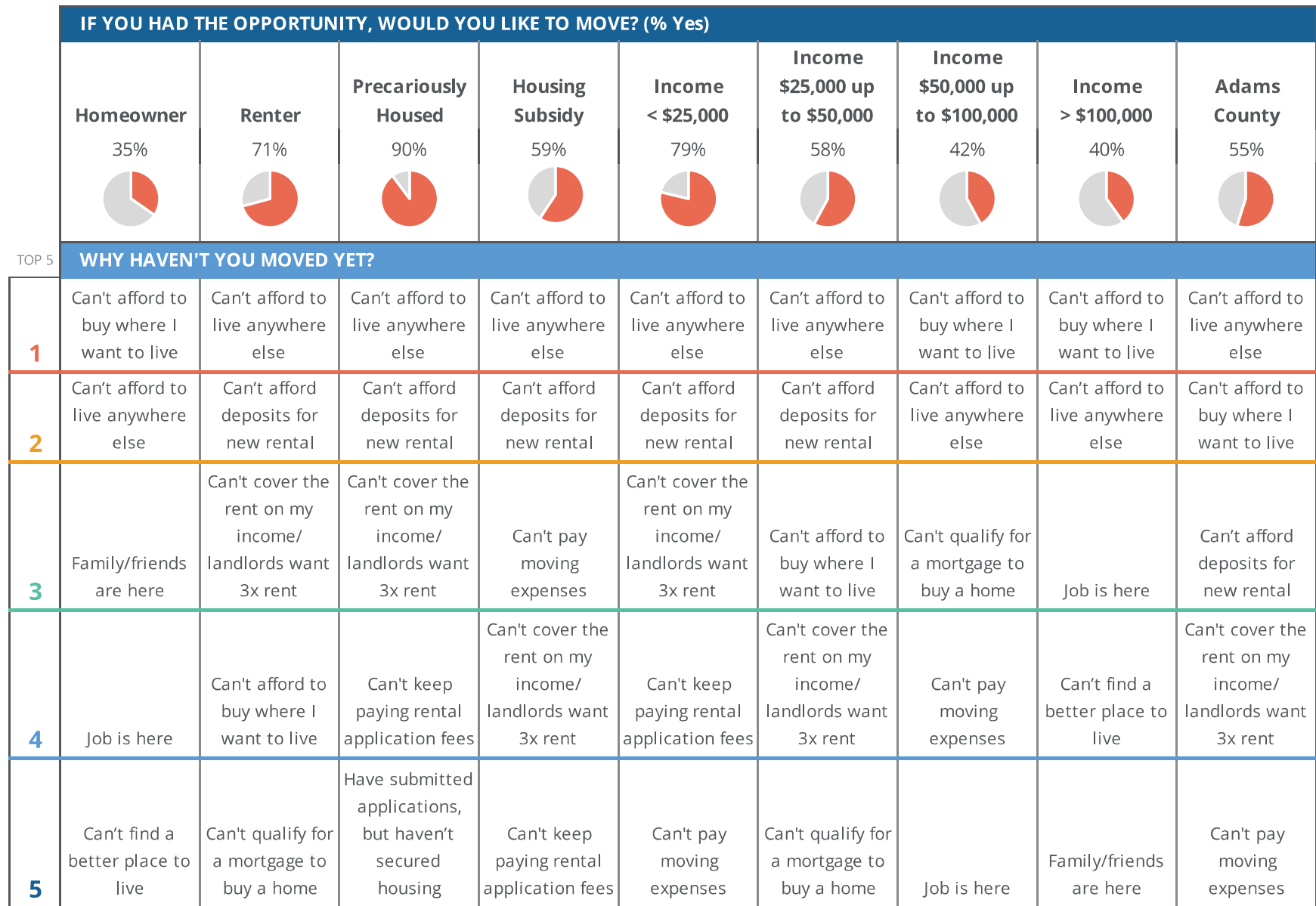
- *“Background check.” (Resident survey respondent)*
- *“Doesn't make financial sense to downsize when it would cost more.” (Resident survey respondent)*
- *“Quiero encontrar algo cerca de mi vecindario en Westminster pero no encuentro.” [I want to find something near my neighborhood in Westminster, but I can't find anything.] (Resident survey respondent)*
- *“In Rapid Rehousing program, a lot of people don't accept it.” (Resident survey respondent)*
- *“Scared to leave due to DV reasons.” (Resident survey respondent)*
- *“Due to the depressed value of homes in Northglenn we cannot get enough money out of this house to buy closer to our children who live in Jefferson County.” (Resident survey respondent)*
- *“Don't want to take kids out of their current school district.” (Resident survey respondent)*

Figure II-7.
Desire to Move and Barriers to Moving, by Jurisdiction



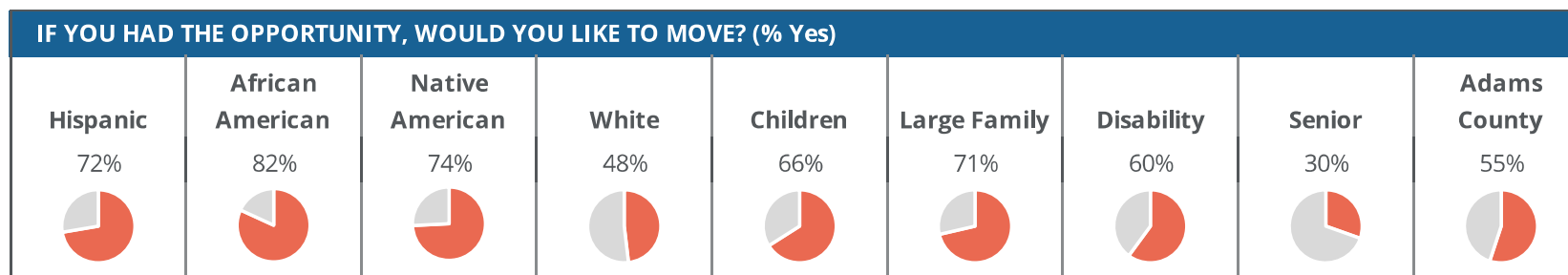
Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-8.
Desire to Move and Barriers to Moving, by Housing Situation and Income



Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-9. Desire to Move and Barriers to Moving, by Select Respondent Characteristics



TOP 5

WHY HAVEN'T YOU MOVED YET?

| | | | | | | | | | |
|----------|---|---|---|---|---|---|---|--|---|
| 1 | Can't afford to live anywhere else | Can't afford to live anywhere else | Can't afford to live anywhere else | Can't afford to live anywhere else | Can't afford to live anywhere else | Can't afford to live anywhere else | Can't afford to live anywhere else | Can't afford to buy where I want to live | Can't afford to live anywhere else |
| 2 | Can't afford deposits for new rental | Can't afford deposits for new rental | Can't afford deposits for new rental | Can't afford to buy where I want to live | Can't afford deposits for new rental | Can't afford deposits for new rental | Can't afford deposits for new rental | Can't afford to live anywhere else | Can't afford to buy where I want to live |
| 3 | Can't cover the rent on my income/ landlords want 3x rent | Can't cover the rent on my income/ landlords want 3x rent | Can't cover the rent on my income/ landlords want 3x rent | Can't afford deposits for new rental | Can't afford to buy where I want to live | Can't cover the rent on my income/ landlords want 3x rent | Can't cover the rent on my income/ landlords want 3x rent | Family/friends are here | Can't afford deposits for new rental |
| 4 | Can't afford to buy where I want to live | Can't keep paying rental application fees | Can't afford to buy where I want to live | Can't cover the rent on my income/ landlords want 3x rent | Can't cover the rent on my income/ landlords want 3x rent | Can't afford to buy where I want to live | Can't afford to buy where I want to live | Can't afford deposits for new rental | Can't cover the rent on my income/ landlords want 3x rent |
| 5 | Can't keep paying rental application fees | Can't find a landlord to rent to me due to my credit, eviction or foreclosure | Can't keep paying rental application fees | Can't pay moving expenses | Can't qualify for a mortgage to buy a home | Can't qualify for a mortgage to buy a home | Can't pay moving expenses | Can't find one-level house or first floor unit (no stairs) | Can't pay moving expenses |

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

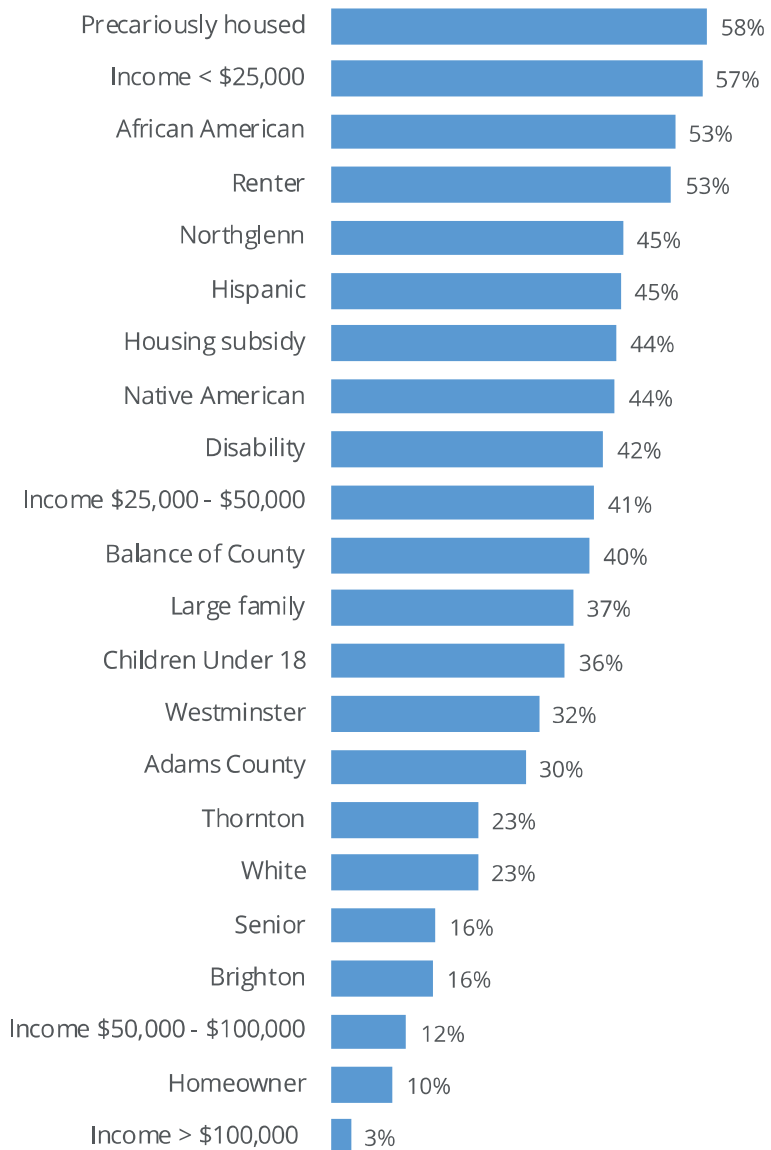
Housing Challenges

This section examines the extent to which survey respondents experience challenges in their current housing situation.

Housing condition. Overall, 30 percent of Adams County survey respondents rate the condition of their home “fair” or “poor”. More than half of those who are precariously housed, have household incomes less than \$25,000, are African American, or are renters consider their home to be in fair/poor condition, in contrast to 10 percent of homeowners and three percent of those with household incomes of \$100,000 or more.

Figure II-10.
How would you
rate the condition
of your home?
(% Fair/Poor)

Source:
 Root Policy Research from the
 2020 Adams County Housing and
 Community Needs Resident
 Survey.



Most needed repair. Of those with homes in fair or poor condition, half report that their home needs one or more repairs. Among these, at least one in 10 identified the following as their most needed repair:

- Windows;
- Interior walls or ceilings (e.g., cracks, water damage);
- Weatherization (e.g., insulation, weather stripping); and
- Heating system (e.g., furnace, hot water heater).

Reason for lack of repair. Among homeowners, 93 percent say they cannot afford to make the needed repair.

- *“Condition of home is too much for me to repair on my own and to upkeep.” (Resident survey respondent)*

The greatest proportion of renters (49%) attribute lack of repair to their landlord’s unwillingness to make repairs, and 40 percent cannot afford to make the repair. Some renters expressed reluctance to report repair needs to their landlord out of fear of being found in violation of their lease or worry that their rent will increase as a result of the repair request.

- *“Afraid management will see there’s more than the legal limit of people living in unit.” (Resident survey respondent)*
- *“Not supposed to be here—me or my kids—so scared to get evicted along with the family trying to help us.” (Resident survey respondent)*
- *“El dueño nos ignora.” [The owner ignored us.] (Resident survey respondent)*
- *“I’m afraid to tell my landlord, for he will hike up my rent.” (Resident survey respondent)*

Housing challenges. Figures II-11, II-12, and II-13 present the top ten housing challenges experienced by the greatest proportion of Adams County survey respondents overall, by jurisdiction, and by housing situation, income, and selected respondent characteristics.

- Overall, one in five Adams County respondents struggle to pay their rent or mortgage, and renters are more likely than homeowners to struggle (43% v. 12%). Hispanic respondents, those with large families, children under 18, disability, or who are Native American are more likely than the average Adams County respondent to struggle to pay housing costs.
- Not surprisingly, the majority of renters (60%) worry about the rent going up more than they can afford. Lower income households, including those with housing subsidies, are more likely than Adams County renters overall to worry about rent

increases. Members of protected classes are also more likely to worry about rent increases.

- Two in five renters want to buy a home but cannot afford the downpayment; a similar share want to buy but cannot due to debt.
- Northglenn respondents are more likely than respondents from other communities or the county overall to worry about rent increases, struggle with paying the rent, and to want to buy a home but experience barriers (e.g., lack downpayment, too much debt).
- While 13 percent of Adams County respondents report that their “house or apartment isn’t big enough for my family members”, renters and the precariously housed, low income households, racial and ethnic minorities, and households with children are more likely and in some cases twice as likely (Hispanic, large families) to say their home isn’t big enough for their household.
- Overall, 13 percent of Adams County respondents identify “high crime in my neighborhood” as a housing challenge. Residents with a housing subsidy are more than twice as likely to consider high crime a current challenge, and renters, African American respondents, and respondents with household incomes of \$25,000 to \$50,000 are also more likely to name high crime as a challenge.
- Respondents with children under the age of 18, those in large households, and those with household incomes greater than \$100,000 are more likely than the typical Adams County respondent to identify “poor/low school quality in my neighborhood” as a challenge.

Figure II-11.
Housing Challenge, by Jurisdiction

- Higher than Region (>5 percentage points)
- About the same as Region (+/- 5 percentage points)
- Lower than Region (<5 percentage points)

| Housing Challenge | Brighton | Northglenn | Thornton | Westminster | Balance of County | Adams County |
|--|----------|------------|----------|-------------|-------------------|--------------|
| I struggle to pay my rent/mortgage | 17% | 34% | 20% | 23% | 25% | 22% |
| I worry about my rent going up to an amount I can't afford | 12% | 31% | 15% | 21% | 20% | 18% |
| Too much traffic/too much street/highway noise | 15% | 15% | 14% | 20% | 20% | 17% |
| I want to buy a house but can't afford the down payment | 13% | 25% | 12% | 20% | 15% | 15% |
| I want to buy a house, but I have too much debt to qualify for a mortgage | 13% | 26% | 12% | 18% | 14% | 15% |
| I have bad/rude/loud neighbors | 12% | 22% | 12% | 15% | 17% | 15% |
| High crime in my neighborhood | 5% | 16% | 10% | 13% | 19% | 13% |
| My house or apartment isn't big enough for my family members | 7% | 16% | 10% | 15% | 17% | 13% |
| No or few grocery stores/healthy food stores in the area | 5% | 8% | 9% | 8% | 21% | 12% |
| Poor/low school quality in my neighborhood | 14% | 10% | 6% | 13% | 16% | 12% |

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-12.
Housing Challenge, by Housing Situation and Income

■ Higher than Region (>5 percentage points)
■ About the same as Region (+/- 5 percentage points)
■ Lower than Region (<5 percentage points)

| Housing Challenge | Homeowner | Renter | Precariously Housed | Housing Subsidy | Income < \$25,000 | Income \$25,000 - \$50,000 | Income \$50,000 - \$100,000 | Income > \$100,000 | Adams County |
|--|-----------|--------|---------------------|-----------------|-------------------|----------------------------|-----------------------------|--------------------|--------------|
| I struggle to pay my rent/mortgage | 12% | 43% | 27% | 31% | 37% | 32% | 19% | 5% | 22% |
| I worry about my rent going up to an amount I can't afford | - | 60% | 17% | 46% | 32% | 31% | 10% | 2% | 18% |
| Too much traffic/too much street/highway noise | 21% | 16% | 8% | 17% | 13% | 22% | 19% | 18% | 17% |
| I want to buy a house but can't afford the down payment | - | 41% | 23% | 26% | 20% | 28% | 13% | 5% | 15% |
| I want to buy a house, but I have too much debt to qualify for a mortgage | - | 41% | 21% | 36% | 21% | 27% | 11% | 3% | 15% |
| I have bad/rude/loud neighbors | 12% | 27% | 9% | 36% | 18% | 21% | 16% | 12% | 15% |
| High crime in my neighborhood | 11% | 19% | 11% | 29% | 15% | 20% | 13% | 8% | 13% |
| My house or apartment isn't big enough for my family members | 3% | 25% | 25% | 19% | 25% | 17% | 5% | 5% | 13% |
| No or few grocery stores/healthy food stores in the area | 16% | 7% | 7% | 3% | 6% | 11% | 14% | 20% | 12% |
| Poor/low school quality in my neighborhood | 14% | 10% | 8% | 14% | 9% | 13% | 12% | 20% | 12% |

Note: - sample size too small to report.

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-13.
Housing Challenge, by Select Respondent Characteristics

■ Higher than Region (>5 percentage points)
■ About the same as Region (+/- 5 percentage points)
■ Lower than Region (<5 percentage points)

| Housing Challenge | Hispanic | African American | Native American | White | Children | Large Family | Disability | Senior | Adams County |
|--|----------|------------------|-----------------|-------|----------|--------------|------------|--------|--------------|
| I struggle to pay my rent/mortgage | 33% | 20% | 29% | 20% | 32% | 33% | 31% | 14% | 22% |
| I worry about my rent going up to an amount I can't afford | 33% | 24% | 23% | 15% | 24% | 22% | 26% | 14% | 18% |
| Too much traffic/too much street/highway noise | 16% | 19% | 15% | 18% | 16% | 16% | 19% | 20% | 17% |
| I want to buy a house but can't afford the down payment | 25% | 25% | 23% | 13% | 24% | 28% | 18% | 5% | 15% |
| I want to buy a house, but I have too much debt to qualify for a mortgage | 26% | 29% | 14% | 11% | 24% | 27% | 18% | 4% | 15% |
| I have bad/rude/loud neighbors | 18% | 22% | 20% | 16% | 20% | 16% | 19% | 8% | 15% |
| High crime in my neighborhood | 15% | 23% | 18% | 13% | 15% | 14% | 18% | 7% | 13% |
| My house or apartment isn't big enough for my family members | 28% | 20% | 20% | 8% | 24% | 28% | 16% | 1% | 13% |
| No or few grocery stores/healthy food stores in the area | 8% | 18% | 14% | 13% | 11% | 10% | 10% | 9% | 12% |
| Poor/low school quality in my neighborhood | 13% | 13% | 12% | 14% | 19% | 19% | 13% | 5% | 12% |

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

The data reported in the previous figures compares housing challenges based on the top ten challenges identified by the greatest proportion of Adams County residents. In some cases, other challenges not found among Adams County respondents overall are more pressing among subpopulations. These include:

- ***I am afraid to let my kids play outside.*** Top 10 challenge for respondents with children under 18, Hispanic respondents, large families, respondents with a housing subsidy, and respondents with household incomes of \$25,000 up to \$50,000.
- ***I have bad credit/history of evictions/foreclosure and cannot find a place to rent.*** Top 10 challenge for African American respondents, Native American respondents, respondents whose household includes a member with a disability, respondents with household income less than \$25,000, and Northglenn respondents.

“When we heard we would be evicted, we were struggling to figure out what to do. The only place we found was the Denver Rescue Mission. It was \$650/month to live there and then you still pay for your food. My kids didn’t qualify because they didn’t make enough money, so they weren’t able to go there. That was the only place we found. The places that “help” don’t do anything for you if you don’t meet their requirements. My kids ended up motel to motel.” (Resident focus group participant)

- ***I can’t pay my utilities.*** Top 10 challenge for respondents with household incomes less than \$25,000 and Northglenn respondents.
- ***Neighborhood does not have safe places for children to play outside.*** Top 10 challenge for respondents with a housing subsidy.

“I don’t let my kids go anywhere without me. I have look into sex offender lists—we have 500 people from 80th to 60th! There are sex offenders everywhere. I take my kids everywhere or have someone with them so that they aren’t out by themselves.” (Resident survey participant)

- ***High blood pressure, stress, stroke, or heart disease because of conditions in the home or neighborhood.*** Top 10 challenge for respondents with a housing subsidy.
- ***My home/apartment is in bad condition.*** Top 10 challenge for Native American respondents.
- ***I need help taking care of myself/my home.*** Top 10 challenge for seniors.
- ***Inadequate sidewalks, street lights, drainage, or other infrastructure in my neighborhood.*** Top 10 challenge for seniors, households with incomes of \$50,000 up to \$100,000, households with incomes of \$100,000 or more, Brighton respondents, and Westminster respondents.

“The sidewalks are all falling apart around here so I can’t get around in my wheelchair. On Federal there’s no sidewalk to Arby’s, no sidewalk on Craft Way.” (Resident focus group participant)

- ***I can’t get to public transit/bus/light rail easily or safely.*** Top 10 challenge for White respondents, seniors, respondents with household incomes of \$50,000 up to \$100,000, households with incomes of \$100,000 or more, Brighton respondents, and Thornton respondents.

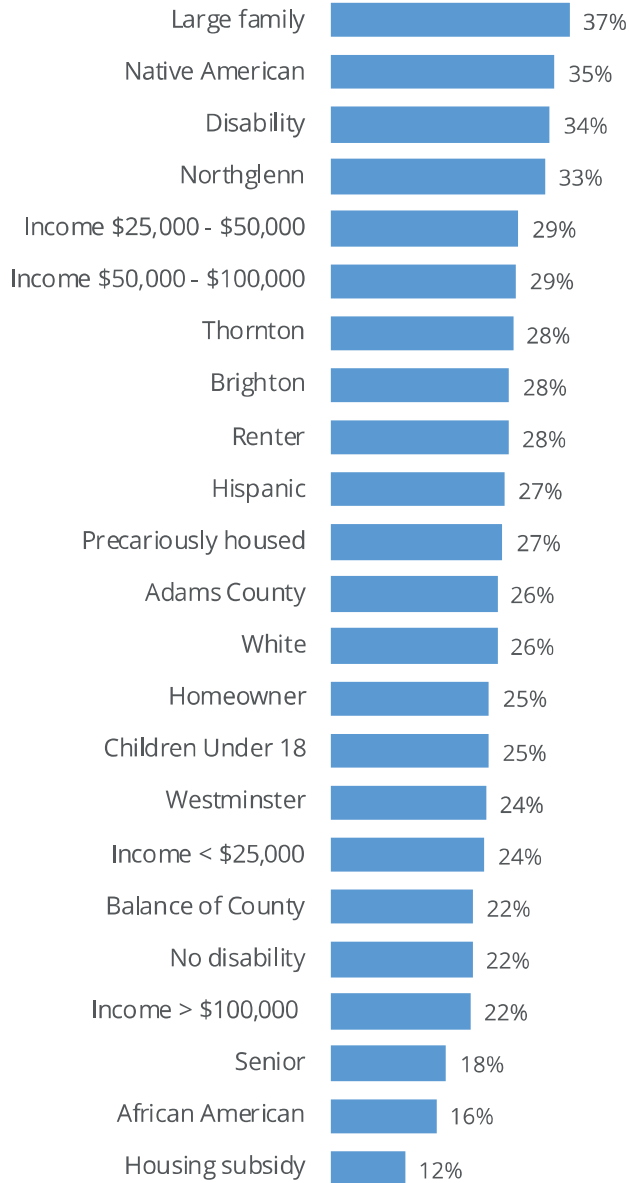
“I’m blind, and bus drivers are not very helpful telling me where to go next and which way I am facing, and so forth. There’s a sidewalk missing on service road off Federal Blvd.” (Resident focus group participant)

- ***Not enough job opportunities in the area.*** Top 10 challenge for respondents with incomes of \$100,000 or more and Brighton respondents.
- ***The HOA in my neighborhood won’t let me make changes to my house or property.*** Top 10 challenge for respondents with incomes of \$100,000 or more.
- ***I am too close to industrial uses/landfill/other environmental hazards.*** Top 10 challenge of respondents with incomes of \$100,000 or more.

Affordability challenges—doubling up. More than one in four Adams County respondents is doubled up—someone over the age of 18 is living in the respondent’s home because the other adult cannot afford to live on their own. At least one in three respondents who are Native American, who have a household member with a disability, or live in Northglenn are doubled up. It is not surprising that large families (5+ members) are most likely to be living in doubled up circumstances.

Figure II-14.
Does anyone over the age of 18 live with you because they cannot afford to live on their own? (% Yes)

Source:
 Root Policy Research from the 2020
 Adams County Housing and Community
 Needs Resident Survey.



Examples of how respondents describe their situation include:

- *“This isn’t my apartment; I stay with family, but I need my own place for my kids and I.” (Resident survey participant)*
- *“I would like to move because I currently live with family but there isn’t anything affordable.” (Resident survey respondent)*
- *“My husband left me and I was forced to live back with my parents, along with my 3 children.” (Resident survey respondent)*





















Affordability challenges—rising costs. As shown in Figure II-15, nearly half (48%) of respondents experienced an increase in their rent or mortgage payment (property

tax, insurance, HOA fees, or special district fees) in 2019. The median monthly housing cost increase from 2018 to 2019 was \$100 for both homeowners and renters, and among the jurisdictions in Adams County. The median cost increase of \$100 is also consistent for most income segments and by respondent characteristics. Households with housing subsidies, seniors, and those with household incomes of \$25,000 up to \$50,000 experienced more modest median housing cost increases. Utility cost increases impacted three out of five Adams County respondents, with a median monthly increase of \$60. The median utility cost increases ranged from \$50/month for Thornton respondents to \$75 for Brighton respondents.

Respondents who described rising housing costs frequently attributed the change to property taxes, metro district taxes/fees, or HOA fee increases or assessments.

- *“Property taxes are becoming unaffordable.” (Resident survey respondent)*
- *“Property Taxes are too much. Electric and water rates keep increasing.” (Resident survey respondent)*
- *“Water is too expensive here.” (Resident survey respondent)*
- *“Taxes/metro district way too high.” (Resident survey respondent)*













Figure II-15.
Monthly Median Housing and Utility Costs, % of Respondents with Housing or Utility Cost Increases from 2018 to 2019, and Median Amount of Monthly Increase (by Jurisdiction and Housing Tenure)

| | Median Rent/ Mortgage | Rent or mortgage/PTI increased in 2019? (% Yes) | Median Increase | Median Utilities | Utilities increased in 2019? (% Yes) | Median increase |
|-----------------------------------|--------------------------|---|-----------------|------------------|---|-----------------|
| Jurisdiction | | | | | | |
| Adams County | \$1,450 |  48% | \$100 | \$205 |  61% | \$60 |
| Balance of County | \$1,350 |  49% | \$100 | \$210 |  52% | \$60 |
| Brighton | \$1,650 |  50% | \$100 | \$300 |  69% | \$75 |
| Northglenn | \$1,400 |  53% | \$100 | \$200 |  51% | \$65 |
| Thornton | \$1,500 |  46% | \$100 | \$200 |  60% | \$50 |
| Westminster | \$1,300 |  48% | \$100 | \$200 |  74% | \$60 |
| Tenure and housing subsidy | | | | | | |
| Homeowner | \$1,690 |  50% | \$100 | \$250 |  70% | \$50 |
| Renter | \$1,240 |  58% | \$100 | \$160 |  58% | \$60 |
| Precariously housed | \$700 |  33% | \$125 | \$200 |  35% | \$80 |
| Housing subsidy | \$870 |  52% | \$65 | \$80 |  48% | \$60 |

Note: - sample size too small to report. Median increase for both housing costs and utilities are the monthly amount of the increase over 2018 monthly costs. Housing cost data do not include HOA dues. Respondents provided average monthly utility costs, factoring in seasonal differences in utilities.

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-16.
Monthly Median Housing and Utility Costs, % of Respondents with Housing or Utility Cost Increases from 2018 to 2019, and Median Amount of Monthly Increase (by Income and Select Respondent Characteristics)

| | Median Rent/ Mortgage | Rent or mortgage/PTI increased in 2019? (% Yes) | Median Increase | Median Utilities | Utilities increased in 2019? (% Yes) | Median increase |
|----------------------------------|--------------------------|---|-----------------|------------------|---|-----------------|
| Jurisdiction | | | | | | |
| Adams County | \$1,450 |  48% | \$100 | \$205 |  61% | \$60 |
| Income | | | | | | |
| < \$25,000 | \$970 |  42% | \$100 | \$150 |  43% | \$65 |
| \$25,000 - \$50,000 | \$1,200 |  53% | \$80 | \$200 |  66% | \$50 |
| \$50,000 - \$100,000 | \$1,583 |  51% | \$100 | \$200 |  64% | \$50 |
| \$100,000+ | \$2,050 |  47% | \$100 | \$270 |  68% | \$60 |
| Household Characteristics | | | | | | |
| Hispanic | \$1,200 |  48% | \$100 | \$200 |  48% | \$75 |
| African American | \$1,200 |  35% | \$100 | \$150 |  48% | \$75 |
| Native American | \$1,371 |  55% | \$100 | \$200 |  45% | \$75 |
| White | \$1,520 |  48% | \$100 | \$220 |  64% | \$50 |
| Children < 18 | \$1,500 |  51% | \$100 | \$250 |  56% | \$75 |
| Large family | \$1,500 |  45% | \$100 | \$250 |  54% | \$75 |
| Disability | \$1,241 |  51% | \$100 | \$175 |  62% | \$70 |
| Senior | \$1,050 |  41% | \$65 | \$200 |  75% | \$50 |

Note: - sample size too small to report. Median increase for both housing costs and utilities are the monthly amount of the increase over 2018 monthly costs. Housing cost data do not include HOA dues. Respondents provided average monthly utility costs, factoring in seasonal differences in utilities.

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Housing challenges—mobile/manufactured home park residents. A total of 58 Adams County survey respondents live in mobile/manufactured homes and nearly all are located in mobile home parks. Most (81%) rent their lot space.

- The majority (52%) *do not* have a written lease, and rent month to month;
- Two in five (41%) signed leases with a duration of at least six months;
- The balance either signed shorter leases (5%) or sign a new lease every month for one month (2%).

In addition to the challenges described above, residents living in mobile home parks may experience housing challenges unique to the setting, and regardless of whether or not they own their mobile home. These challenges include:

- I worry that the rent on my lot will increase more than I can afford (64%);
- The water, sewer, and other infrastructure in my mobile home park are in poor condition (29%);
- The park owner and I disagree about who is responsible for lot maintenance (e.g., tree trimming, landscaping, fence repairs) (19%);
- My mobile home park sold/is for sale, and I worry that I will have to move (7%);
- The park owner does not allow children to play outside in the park (5%);
- I am treated differently by the park owner because I don't speak English (2%); and
- My household needs a ramp installed so a family member with a disability can access the home (2%).

Residents shared examples of the challenges they experience, including:

- *"We speak both languages, but I have noticed that others that are Spanish speaking only are treated poorly. Also, there has been for some time now a sewer issue that affects the end of the mobile home park mobile homes. This is a known problem with the owners and management, yet nothing has been done because again, the ones that are put in those mobile homes are Spanish speakers only." (Resident survey respondent)*
- *"Trailer park manager keeps changing rules to suit her demands, had all renters remove fences and demand siding to be placed on all metal sided trailers or face eviction even if they own their homes." (Resident survey respondent)*
- *"I have had a SEVERAL SEWER back-ups under my trailer, and it is the parks fault or responsibility. Smell comes in home, etc. It continues to happen all the time and they don't do anything to fix the problem. They just fix the issue at the time and leave." (Resident survey respondent)*

- *“Because I own my home, my mobile home park owner is unfair. They started leasing new homes without the option to buy and are trying to kick those who own their homes outright out.” (Resident survey respondent)*

Housing challenges—difficulty using housing vouchers. A total of 94 Adams County respondents (6%) receive some form of housing subsidy, and 25 participate in either the Housing Choice Voucher/Section 8 program or another voucher program.

Of those with vouchers, more than half report that it is “very difficult” to find a landlord that accepts a housing voucher. When asked what made it difficult to find a landlord, the most common responses include:

- Not enough properties available (15 of 25);
- Have a hard time finding information about landlords that accept Section 8 (10 of 25);
- Landlords have policies of not renting to voucher holders (9 of 25); and
- Voucher is not enough to cover the rent for places I want to live (9 of 25).

Respondent descriptions include:

- *“I couldn't afford to be picky. This was the only place I could find which would take my voucher that had anything available.” (Resident survey respondent)*
- *“Places that used to accept Section 8, no longer do, so the list is slimmer and slimmer.” (Resident survey respondent)*
- *“The neighborhoods that the vouchers are available are not good neighborhoods. We have shootings nightly and my daughter was even almost shot in the summer while playing outside at 4 pm.” (Resident survey respondent)*

Housing challenges—disability. Of the respondents whose household includes a member with a disability, 78 percent have accessibility needs in the home or to access the home. **Nearly three in 10 (28%) live in a home that does not meet the accessibility needs of their household member with a disability.**

The most common improvements or modifications needed include:

- Grab bars in bathroom (43%);
- Ramps (27%);
- Reserved accessible parking spot by entrance (24%);
- Stair lifts (24%);

- Wider doorways (23%);
- Service or emotional support animal allowed in apartment/room/home (18%);
- Alarm to notify if someone leaves the home (12%); and
- Alarm to notify if someone leaves the home (11%).

Other housing challenges experienced by people with disabilities. In addition to the housing challenges explored above, respondents whose household includes a member with a disability reported other housing challenges they and their family experience. Among respondents whose household includes a member with a disability, these challenges are:

- “I can’t afford the housing that has accessibility features I need (e.g., grab bars, ramps, location, size of unit)—14 percent of all disability households, 21 percent of precariously housed respondents whose household includes a member with a disability;
- “I worry about retaliation if I report harassment by my neighbors/building staff/landlord” (10% overall and 21% of renters whose household includes a member with a disability);
- “I have a disability or a household member has a disability and cannot get around the neighborhood because of broken sidewalks or no sidewalks” (10% overall, 12% homeowners, and 8% of renters); and
- “I worry if I request an accommodation for my disability my rent will go up or I will be evicted” (13% of renters).

Most needed services or supports if the person with a disability in the household wants to get a job or a better job. The majority of the respondents with a disability or a member of the household with a disability are retired or are unable due to their disability. Of those who would like to get a job or a better job, the three primary impediments describe are:

- Lack of access to adequate, reliable, accessible, affordable transportation;
- Too few employers willing to hire people with disabilities; and
- Need for additional work readiness training or other skill development.

Most needed services or supports to achieve or preserve the housing situation best for household member with a disability. Accessibility modifications, including assistance to pay for or reduce the cost of modifications, and accommodations,

access to transportation, and case management to help families in need navigate housing and services are the primary factors described by respondents.

- *"Informing the person renting that they can get things modified within reason."*
- *"Assistance in knowing what to do to get housing. I keep finding out I don't know what I'm doing."*
- *"Help with accessibility on a sliding pay scale for porches, stairs."*
- *"More affordable and handicapped accessible homes."*
- *"Good public transportation that will come to the house."*
- *"We have struggled since we became homeless. My disabled son is very hard to have deal with on a daily basis."*
- *"Renovated bathroom for wheelchair accessibility. Ramp out the back door. Widened back door and widened interior doors."*
- *"Help with driving to doctor appointments in bad weather, shopping and housework."*

Access to community amenities, facilities, and services. When asked what is needed most to help the member of the household with a disability participate in community activities and amenities, transportation access and sidewalk improvements were the most common responses. Transportation access includes improved bus service, on weekends and to destinations, and availability of accessible parking at events and destinations.

- *"Adequate walkways for disabled in all areas mentioned above. Easy access to all areas and more handicap parking spaces everywhere!"*
- *"Better bus service, especially on weekends."*
- *"It would be nice to have a low sensory day or early open time for kids that have processing disorders. Currently the only program that I'm aware of that offers this is the Museum of Nature and Science."*
- *"Cheaper or discounted public transportation community events that are free."*
- *"I use Senior Source but would like to be able to have more sources and wider area of coverage for these rides."*
- *"More WHEELCHAIR VAN Accessible parking but MONITORED for illegal parking. When I take my daughter to Kid's Night Out at Westminster City Park Rec Center on Friday nights, there is only ONE space that has an access aisle wide enough for me to get my Van ramp down"*

and off of it. It's rare that I am able to park in this spot because other people without Disability plates/tags park in this space."

- *"Safe walk paths, security and easy access."*

Housing challenges—older adults. One-third of the survey respondents are age 60 or older or have a household member in that age group. To better understand the impact of aging on residents' future housing plans, these respondents were asked whether they plan to move in the next five to 15 years:

- Nearly two in five (37%) plan to stay in their current home;
- About one in eight (13%) want to stay in their current home but worry they won't be able to stay;
- About one in four (24%) want to move to a new home, but worry they won't be able to find the type of home they want at a price they can afford;

Difficulty aging in place. Those respondents who want to stay in their current home but worry they won't be able to stay identify financial issues, health issues, and maintenance/housekeeping issues as the primary threats to their aging in place.

- *"The house and yard are becoming unmanageable as we age up." (Resident survey respondent)*
- *"My home has too many stairs and my children live in another state." (Resident survey respondent)*

Lack of suitable and affordable options for downsizing. One in four respondents with older adults in the home want to move but worry they won't be able to find a place that meets their needs and is affordable. Needs in a future home may include one-level living, small or no yards to maintain, and, for many, be located in or near their current neighborhood. In addition to affordable rent or mortgages, for those looking to buy, HOA fees can be an impediment.

- *"As my husband and I age, we think about moving due to the fact that we have stairs in our home but love our home and neighborhood." (Resident survey respondent)*
- *"Need zero stairs; worried HOA fees will be too high. We looked at a townhome off of Colorado and 128th—perfect for us—but HOA was over \$300 a month and added to mortgage made it too expensive." (Resident survey respondent)*
- *"Am on Social Security. Home is paid for. Resources to move are limited because of cost of housing." (Resident survey respondent)*

Rising housing costs. Respondents who worry they won't be able to stay in their also expressed concern about rising housing costs, particularly property taxes, rents, and HOA fees.

- *"Can't afford this high rent, I have fixed income." (Resident survey respondent)*
- *"Property tax increase in one year of \$800. Cannot get exemption for 3 more years." (Resident survey respondent)*
- *"But taxes are too high NOW, water too expensive and I'll be dead before I can qualify for a senior tax exemption. 10 years of continuous residency is too long to impose on an owner over 72. The senior exemption should be transferable if I already had on a previous Adams County property." (Resident survey respondent)*

Displacement and Recent Experience Seeking Housing

This section explores residents' experience seeking a place to rent or buy in the region and the extent to which displacement—having to move when they do not want to move—is prevalent. For those respondents who seriously looked for housing in the past five years, the survey also examined the extent to which respondents were denied housing to rent or buy and the reasons why they were denied.

Displacement experience. In the last five years, one in eight (13%) Adams County survey respondents experienced displacement—had to move out of a home in Adams County when they did not want to move. Figures II-17 and II-18 present the share of residents who experienced displacement in the last five years and the share who attribute their displacement experience to "rent increased more than I could pay," "lost job/hours reduced", "evicted: behind on the rent," and "was living in unsafe conditions (e.g., domestic assault, harassment)."

Respondent segments with displacement rates at least twice as high as Adams County overall include:

- **Precariously housed.** Two in five (43%) of respondents who are currently precariously housed experienced displacement from a residence in Adams County in the past five years. Three in 10 had to move because rent increased more than they could pay and one in four were evicted for being behind on the rent.
- **Renters.** Three in 10 renters (30%) report recent displacement, and a plurality (42%) attribute the displacement to increased rent.
- **Low income households.** Households with incomes less than \$25,000 who experienced displacement (26%) are more likely than Adams County respondents overall to cite lost wages (22%) and eviction due to being behind on the rent (22%) as reasons for displacement.











Although not as pronounced as displacement experienced by those who are precariously housed, renters in general, and low income households, at least one in five Hispanic (22%), African American (20%), and Native American (20%) respondents report being displaced in Adams County in the past five years.

Differences in reasons for displacement. Among all of the respondents who experienced displacement, there is variation by protected class. Compared to Adams County overall and other segments of displaced respondents:

- Hispanic respondents were more likely to have been displaced due to lost job/hours reduced (33%) and eviction due to being behind on the rent (29%) than any other respondent segment.
- Hispanic households and households with children were more likely than any other displaced respondents to have been displaced due to “living in unsafe conditions (e.g., domestic assault, harassment)—22 percent of respondents with children and 20 percent of Hispanic respondents.
- Respondents who are disabled or have a household member with a disability and respondents with children under 18 are most likely to cite “rent increased more than I could pay” as the reason for displacement (48% each).

Figure II-17.

In the past five years, have you had to move out of a home or apartment in the Adams County area when you did not want to move? (% Displaced), by Jurisdiction and Housing Tenure














| | Percent Displaced | REASON FOR DISPLACEMENT | | | |
|-----------------------------------|---|--------------------------------------|------------------------|-----------------------------|--|
| | | Rent increased more than I could pay | Lost job/hours reduced | Evicted: behind on the rent | Was living in unsafe conditions (e.g., domestic assault, harassment) |
| Jurisdiction | | | | | |
| Adams County |  13% | 36% | 17% | 16% | 12% |
| Balance of County |  13% | 36% | 15% | 22% | 10% |
| Brighton |  15% | - | - | - | - |
| Northglenn |  20% | - | - | - | - |
| Thornton |  10% | 34% | 16% | 12% | 10% |
| Westminster |  14% | 27% | 20% | 10% | 14% |
| Tenure and housing subsidy | | | | | |
| Homeowner |  4% | 35% | 3% | 0% | 0% |
| Renter |  31% | 42% | 16% | 12% | 12% |
| Precariously housed |  43% | 30% | 22% | 24% | 15% |
| Housing subsidy |  17% | - | - | - | - |

Note: - sample size too small to report.

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-18.

In the past five years, have you had to move out of a home or apartment in the Adams County area when you did not want to move? (% Displaced), by Income and Select Respondent Characteristics

| | Percent Displaced | REASON FOR DISPLACEMENT | | | |
|----------------------------------|---|--------------------------------------|------------------------|-----------------------------|--|
| | | Rent increased more than I could pay | Lost job/hours reduced | Evicted: behind on the rent | Was living in unsafe conditions (e.g., domestic assault, harassment) |
| Jurisdiction | | | | | |
| Adams County |  13% | 36% | 17% | 16% | 12% |
| Income | | | | | |
| < \$25,000 |  26% | 32% | 22% | 22% | 15% |
| \$25,000 - \$50,000 |  13% | - | - | - | - |
| \$50,000 - \$100,000 |  7% | - | - | - | - |
| \$100,000+ |  3% | - | - | - | - |
| Household Characteristics | | | | | |
| Hispanic |  22% | 46% | 33% | 29% | 20% |
| African American |  20% | - | - | - | - |
| Native American |  20% | - | - | - | - |
| White |  9% | 45% | 14% | 20% | 14% |
| Children < 18 |  16% | 48% | 30% | 26% | 22% |
| Large family |  19% | 43% | 25% | 30% | 11% |
| Disability |  17% | 48% | 23% | 27% | 16% |
| Senior |  6% | - | - | - | - |

Note: - sample size too small to report.

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Recent experience seeking housing. Overall, 53 percent of survey respondents seriously looked for housing to rent or buy in Adams County in the past five years, where “serious” looking includes touring homes or apartments, putting in applications or applying for mortgage financing. These respondents identified issues they experienced when seeking housing to rent or buy as shown in Figures II-19 and II-20.

- Respondents who are currently precariously housed, have household incomes less than \$50,000, have a housing subsidy, or are currently renters are more likely than the average Adams County home seeker to experience:
 - Landlords not returning calls about units for rent;
 - Being told that a unit was available over the phone, “but when I showed up in person, the landlord told me it was no longer available” and
 - Landlords not returning emails asking about a unit.
- Hispanic and African American respondents, respondents with large families, and respondents whose household includes a member with a disability are more likely to have calls to landlords go unreturned or to be told the housing was no longer available once the respondent arrived in person. Households with children under 18 were not more (or less) likely than all Adams County home seekers to report difficulties with landlords or lenders.
- All of the variation between the experiences of all Adams County home seekers and those who are members of protected classes occur in the rental market. Further, income differences between those with incomes less than \$50,000 and those with household incomes greater than \$50,000 are also found only in the rental market.

Figure II-19.

When you looked for housing in the Adams County area in the past five years, did you experience any of the following? By Housing Tenure and Income

- Higher than Region (>5 percentage points)
- About the same as Region (+/- 5 percentage points)
- Lower than Region (<5 percentage points)

| When you seriously looked for housing in Adams County in the last five years, did you experience any of the following...? | Homeowner | Renter | Precariously Housed | Housing Subsidy | Income < \$25,000 | Income \$25,000 - \$50,000 | Income \$50,000 - \$100,000 | Income > \$100,000 | Adams County |
|---|-----------|--------|---------------------|-----------------|-------------------|----------------------------|-----------------------------|--------------------|--------------|
| Landlord did not return calls asking about a unit | 2% | 31% | 33% | 28% | 35% | 23% | 6% | 2% | 16% |
| I was told the unit was available over the phone, but when I showed up in person, the landlord told me it was no longer available | 2% | 23% | 23% | 33% | 25% | 19% | 2% | 2% | 12% |
| Landlord did not return emails asking about a unit | 1% | 22% | 22% | 19% | 22% | 19% | 6% | 2% | 11% |
| A bank or other lender would not give me a loan to buy a home | 4% | 19% | 12% | 12% | 12% | 10% | 13% | 3% | 9% |
| A bank or other lender charged me a high interest rate on my home loan | 5% | 3% | 3% | 2% | 1% | 5% | 8% | 3% | 4% |
| The real estate agent only showed me homes in neighborhoods where most people were of my same race or ethnicity | 4% | 1% | 1% | 0% | 1% | 2% | 2% | 3% | 2% |
| I requested a disability accommodation for myself or my family and it was not made | 0% | 2% | 2% | 7% | 3% | 2% | 0% | 0% | 1% |

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-20.

When you looked for housing in the Adams County area in the past five years, did you experience any of the following? By Select Respondent Characteristics

- Higher than Region (>5 percentage points)
- About the same as Region (+/- 5 percentage points)
- Lower than Region (<5 percentage points)

| When you seriously looked for housing in Adams County in the last five years, did you experience any of the following...? | Hispanic | African American | Native American | White | Children | Large Family | Disability | Senior | Adams County |
|---|----------|------------------|-----------------|-------|----------|--------------|------------|--------|--------------|
| Landlord did not return calls asking about a unit | 29% | 27% | - | 11% | 20% | 23% | 25% | 9% | 16% |
| I was told the unit was available over the phone, but when I showed up in person, the landlord told me it was no longer available | 19% | 25% | - | 8% | 15% | 15% | 19% | 5% | 12% |
| Landlord did not return emails asking about a unit | 19% | 14% | - | 9% | 15% | 14% | 16% | 6% | 11% |
| A bank or other lender would not give me a loan to buy a home | 13% | 8% | - | 8% | 11% | 14% | 12% | 5% | 9% |
| A bank or other lender charged me a high interest rate on my home loan | 5% | 4% | - | 4% | 4% | 6% | 5% | 6% | 4% |
| The real estate agent only showed me homes in neighborhoods where most people were of my same race or ethnicity | 2% | 0% | - | 3% | 2% | 3% | 3% | 1% | 2% |
| I requested a disability accommodation for myself or my family and it was not made | 2% | 0% | - | 1% | 1% | 0% | 3% | 0% | 1% |

Note: Sample sizes of respondents who seriously looked for housing too small to report for Native American households.

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.











Denied housing to rent or buy. Of those Adams County respondents who seriously looked for housing in Adams County in the past five years, **one in four (26%) were denied housing** to rent or buy, mostly due to “income too low” and “bad credit”. Figure II-14 presents the proportion of residents who seriously looked for housing and were denied and the share who attribute denial to “income too low,” “bad credit,” “lack of stable housing record,” “criminal history,” and “eviction history.”

Denial rates vary widely by respondent characteristics:

- The lowest income households are twice as likely as the average Adams County home seeker to be denied housing to rent or buy (50% v. 26%). More moderate income households are 1.5 times more likely to be denied.
- Only 4 percent of current homeowners who seriously looked for housing experienced housing denial, compared to 46 percent of current renters, and 56 percent of those who are precariously housed. While lack of income and bad credit are the most frequently named reasons for being denied a home to rent or buy, prior evictions is a factor for one in four (26%) precariously housed residents.
- More than two in five Hispanic respondents and African American respondents who seriously looked for housing experienced denial, compared to one in five White respondents.

Figure II-21.

If you looked seriously for housing to rent or buy in the Adams County area in the past five years, were you ever denied housing? (% Denied) By Jurisdiction and Housing Tenure













| | Percent denied housing to rent or buy in the past 5 years | REASON FOR DENIAL | | | | |
|-----------------------------------|---|-------------------|------------|-------------------------------|------------------|------------------|
| | | Income too low | Bad credit | Lack of stable housing record | Criminal history | Eviction history |
| Jurisdiction | | | | | | |
| Adams County |  26% | 55% | 49% | 13% | 13% | 19% |
| Balance of County |  28% | 54% | 54% | 19% | 18% | 28% |
| Brighton |  26% | - | - | - | - | - |
| Northglenn |  28% | - | - | - | - | - |
| Thornton |  20% | 50% | 42% | 6% | 10% | 15% |
| Westminster |  34% | 63% | 53% | 18% | 15% | 15% |
| Tenure and housing subsidy | | | | | | |
| Homeowner |  4% | - | - | - | - | - |
| Renter |  46% | 55% | 57% | 13% | 13% | 13% |
| Precariously housed |  56% | 60% | 47% | 15% | 14% | 26% |
| Housing subsidy |  42% | - | - | - | - | - |

Note: - sample size too small to report.

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-22.

If you looked seriously for housing to rent or buy in the Adams County area in the past five years, were you ever denied housing? (% Denied) By Income and Select Respondent Characteristics

| | Percent denied housing to rent or buy in the past 5 years | REASON FOR DENIAL | | | | |
|----------------------------------|---|-------------------|------------|-------------------------------|------------------|------------------|
| | | Income too low | Bad credit | Lack of stable housing record | Criminal history | Eviction history |
| Jurisdiction | | | | | | |
| Adams County |  26% | 55% | 49% | 13% | 13% | 19% |
| Income | | | | | | |
| < \$25,000 |  50% | 64% | 50% | 18% | 17% | 21% |
| \$25,000 - \$50,000 |  38% | 53% | 49% | 12% | 16% | 22% |
| \$50,000 - \$100,000 |  14% | - | - | - | - | - |
| \$100,000+ |  3% | - | - | - | - | - |
| Household Characteristics | | | | | | |
| Hispanic |  42% | 59% | 51% | 23% | 21% | 23% |
| African American |  41% | - | - | - | - | - |
| Native American | - | - | - | - | - | - |
| White |  20% | 52% | 51% | 10% | 11% | 17% |
| Children < 18 |  34% | 64% | 54% | 13% | 16% | 22% |
| Large family |  35% | 64% | 49% | 16% | 20% | 21% |
| Disability |  36% | 58% | 53% | 18% | 18% | 24% |
| Senior |  14% | - | - | - | - | - |

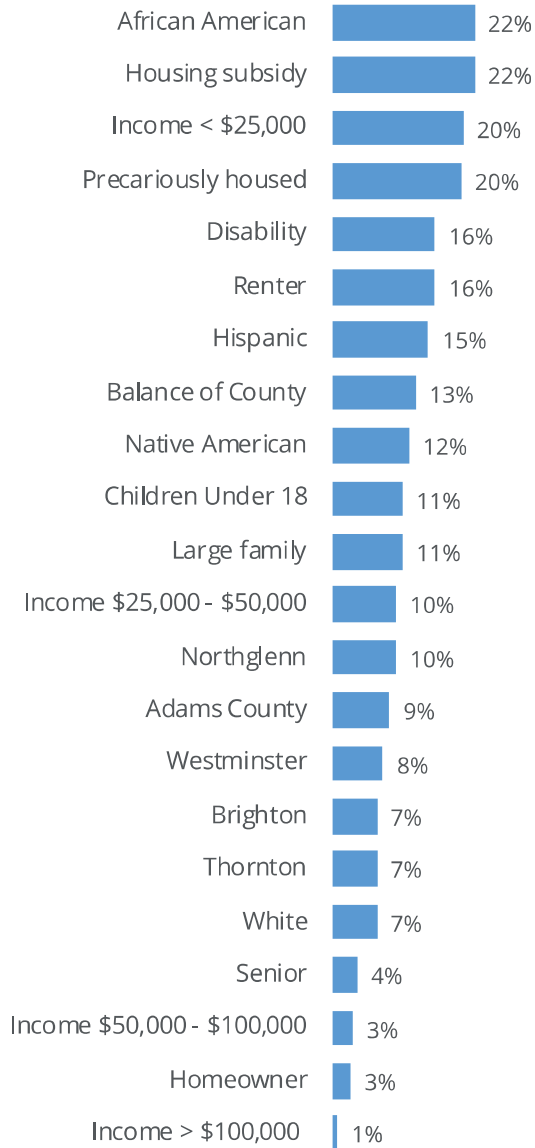
Note: - sample size too small to report.

Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Experience with housing discrimination. As shown in Figure II-23, about one in 10 survey respondents believe they experienced discrimination when they looked for housing in Adams County. African American respondents, respondents with a housing subsidy, those with household incomes less than \$25,000, and precariously housed residents are twice as likely as Adams County respondents overall to feel they had experienced housing discrimination. Seniors, homeowners, and the higher income households were least likely to believe they had experienced housing discrimination in the past.

Figure II-23.
When you looked for housing in the Adams County area, did you ever feel you were discriminated against?

Source:
 Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.



Nearly 75 percent who think they experienced housing discrimination when looking for housing in Adams County say that the incident took place in the past five years, and 37 percent said that it occurred in 2019.

Reasons for discrimination. Respondents described the reasons they think they experienced discrimination when looking for housing to rent or buy Adams County. These include:

- Race/ethnicity (35%);
- Age (25%);
- Income (24%);
- Familial status/having children (20%);
- Looks/appearance (12%);
- Disability (11%);
- Past eviction or foreclosure (11%);
- Criminal history (9%);
- National origin (7%);
- Language spoken (6%);
- Homeless (4%);
- Sex or gender identity (3%);
- Sexual orientation (3%);
- Section 8/voucher program participant (2%); and

None of the participants attributed their discrimination experience to religion.

Examples of how participants described why they thought they were discriminated against include:

- *"Felt because I was Mexican, they treated me like I was illegal." (Resident survey respondent)*
- *"I feel more like it's the color of my skin." (Resident survey respondent)*
- *"I would call and the landlord said they had units. When they saw my husband was Black they would play dumb." (Resident survey respondent)*
- *"Landlord was concerned about me having children." (Resident survey respondent)*

- *“Me dejaron una nota en Mi puerta diciendo que somos ilegales.” [They left a note on my door saying that we are illegal.] (Resident survey respondent)*
- *“Income and my request for a therapy dog for my child.” (Resident survey respondent)*
- *“Just always getting judged for my tattoos and being incarcerated.” (Resident survey respondent)*
- *“Socioeconomic discrimination. Service animal not accepted.” (Resident survey respondent)*
- *“We looked at rental, apartment complexes before deciding to try to purchase. There were barely any Accessible apartments available and those that were—the 1st floor apartments—were charged at a considerably higher rate than 2nd or 3rd floor apartments. Was told it was because more people wanted 1st floor. Baloney...And what older complexes labeled an Accessible apartment was a joke. Bedroom/closet/pantry doors wouldn't be wide enough, there would be stairs outside and inside, bathrooms would not have grab bars or big enough for a wheelchair or wide enough doors. There would not be an Accessible path from Apartment to mailboxes or main office or laundry. Did not feel that complexes wanted individuals in wheelchairs living there. Newer or older complexes.” (Resident survey respondent)*

Response to discrimination. When asked what they did about the discrimination, the most common responses include:

- **“Nothing—I wasn’t sure what to do”** (79%);
- “Moved/found another place to live” (9%);
- “Nothing—I was afraid of being evicted/harassed. (7%);
- “Called/emailed a lawyer/Legal Aid/ACLU” (6%); and
- “Called/emailed housing authority” (4%).

Neighborhood and Community

Survey respondents indicated whether or not they think people like themselves and their family are welcome in all neighborhoods in their community, and the extent to which their neighborhood has qualities that indicate it is a healthy neighborhood.

Welcoming neighborhoods. The majority (58%) of Adams County survey respondents agree or strongly agree with the statement, “I feel that people like me and my family are welcome in all neighborhoods in my city.” As shown in Figure II-24, the likelihood that a respondent agrees with the statement varies by income, race/ethnicity, or housing tenure. Higher income respondents, homeowners, seniors, and White respondents are

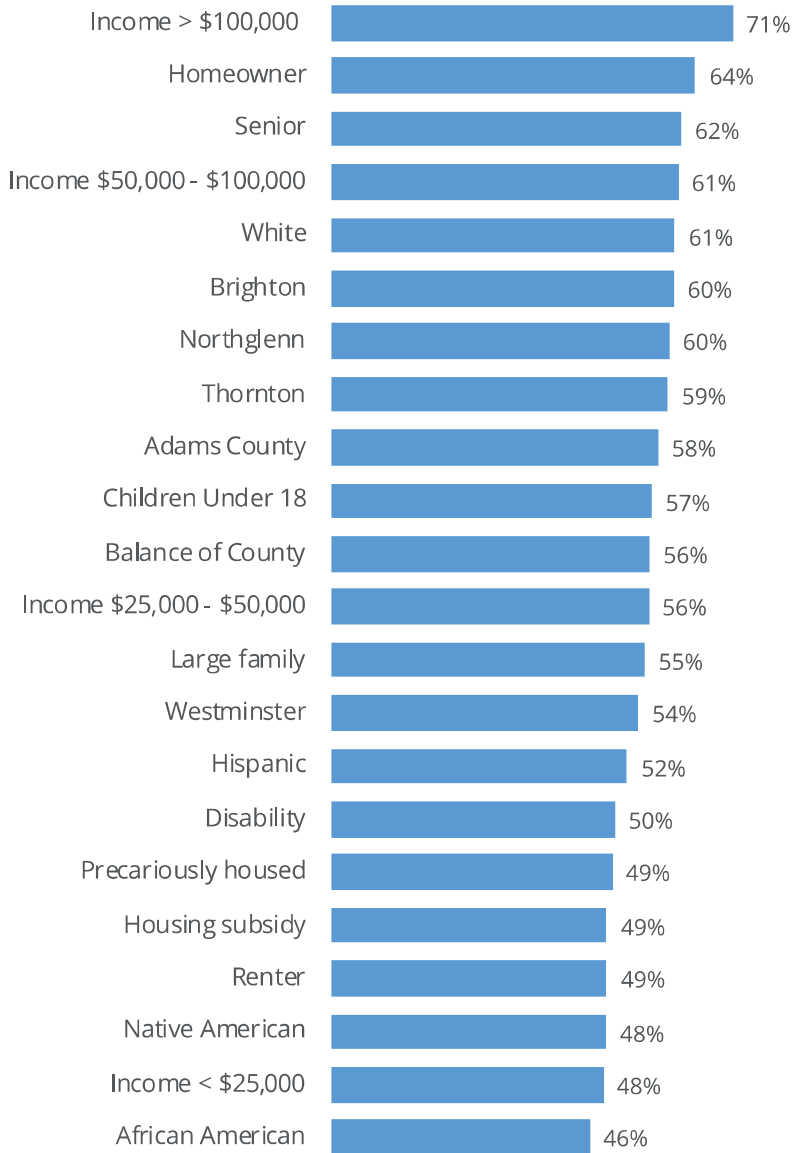
more likely to feel welcome in all areas of their community than renter, Native American respondents, respondents with income less than \$25,000, and African American respondents.

Of those who feel unwelcome, nearly all identified either race/ethnicity or class as the reason why they did not feel welcome everywhere in their city or community. Other reasons for feeling unwelcome include sexual orientation and disability.

- *“Because people don’t like accepting low income families.” (Resident survey respondent)*
- *“Ethnicity differences in some areas and status differences—better to do areas vs. older or not gentrified areas.” (Resident survey respondent)*
- *“Lesbian couple with kids.” (Resident survey respondent)*
- *“Everyone says the house is for rent, then, when you say you have Section 8, they tell you, ‘No, you can’t move in.’” (Resident survey respondent)*
- *“I am Hispanic single mom of two.” (Resident survey respondent)*
- *“There are some areas where an African American person is treated suspiciously.” (Resident survey respondent)*
- *“I don’t fit in with neighbor cultures and languages. Suspensions run high when you are not part of a clan.” (Resident survey respondent)*
- *“Mixed race family, lower income, single parent home, child with autism.” (Resident survey respondent)*
- *“People with lower income face an ugly stigma.” (Resident survey respondent)*

Figure II-24.
“I feel that people like me and my family are welcome in all neighborhoods in my city.” (% Strongly Agree/Agree)

Source:
 Root Policy Research from the 2020
 Adams County Housing and Community
 Needs Resident Survey.

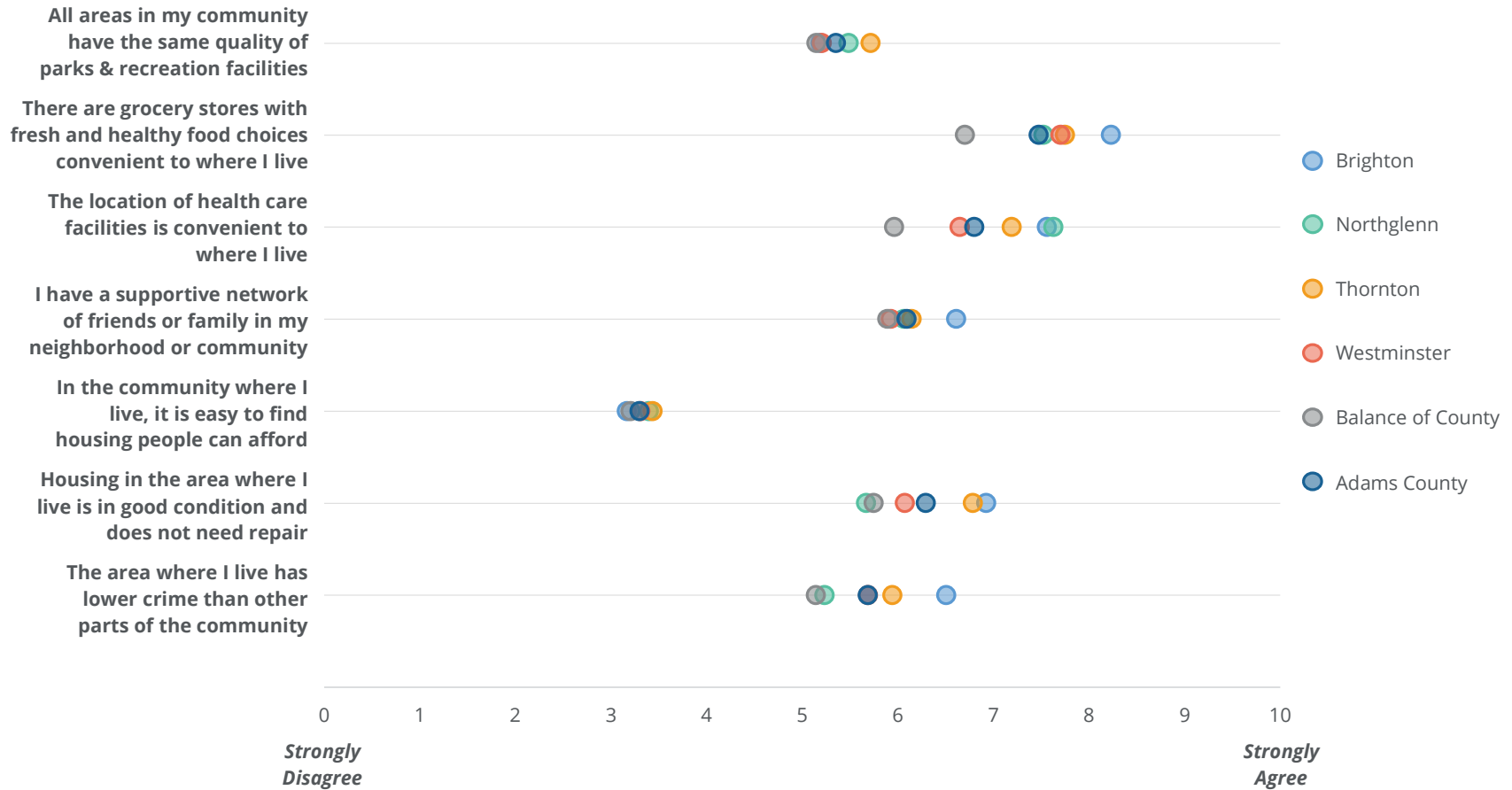


Healthy neighborhoods. Healthy neighborhood indicators measured in the resident survey include the relative quality of parks and recreation facilities among neighborhoods, convenient access to grocery stores and health care facilities, having a supportive network of friends or family, neighborhood housing condition, and crime. Respondents rated their agreement with each statement on a scale of 1 to 10, where 1=strongly disagree and 10=strongly agree.

Figures II-25 and II-27 present the extent to which respondents agree with a series of statements about healthy neighborhood indicators and examines similarities and differences by housing situation, income, and respondent characteristics. Some key findings:

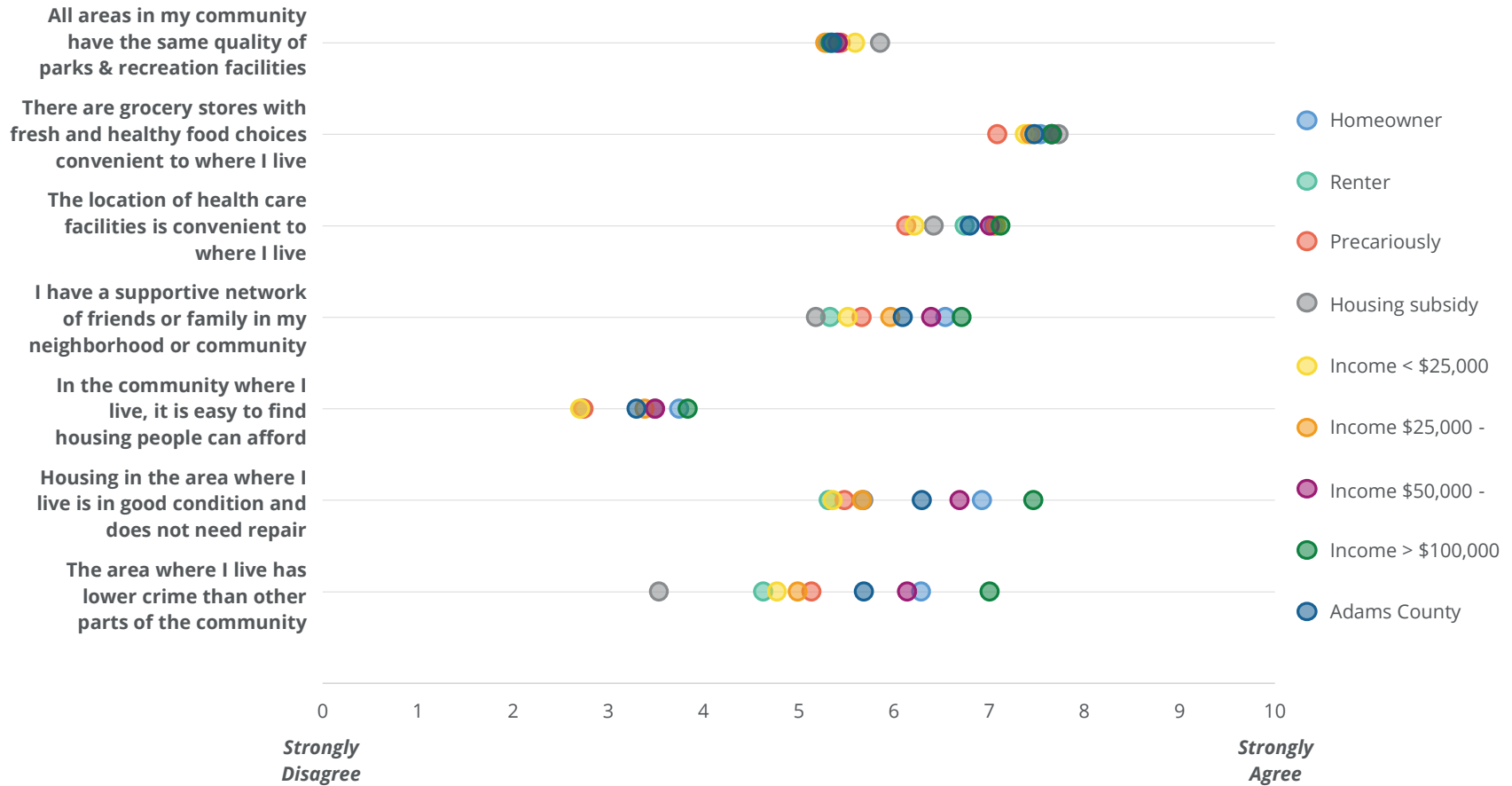
- With the exception of indicators related to housing affordability, respondents tend to agree (average ratings of 5.0 or higher) that the healthy neighborhood indicator applies to them or their neighborhood.
- Among jurisdictions, Brighton residents are more likely to more strongly agree that an indicator applies, while Balance of County are more tepid in their level of agreement.
- Higher income households and homeowners also tend to more strongly agree that healthy neighborhood indicators apply to them.
- While most of the differences are modest, the ratings of healthy neighborhood indicators by African American respondents tend to be lower than all other respondent groups and the ratings of seniors tend to be highest. In particular, African American respondents are less likely to agree all areas in the community have the same quality of part and recreation facilities; that they have convenient access to health care facilities; and to having a supportive network of friends or family in the community.
- Some of the greatest variation in access to healthy neighborhood indicators falls along class and housing tenure lines. In particular, residents who have housing subsidies, rent, have household incomes less than \$25,000 or from \$25,000 up to \$50,000, and who are precariously housed are all less likely to agree that their neighborhood has lower crime. These same resident segments are less likely to agree than homeowners or more affluent respondents that homes in their neighborhood are in good condition and do not need repair.
- Respondents disagree with the statement that “in the community where I live, it is easy to find housing people can afford.” Disagreement is consistent regardless of where the respondent lives and there is no meaningful variation among members of protected classes on this measure. Not surprisingly, the greatest variation is found when this indicator is considered by income and housing tenure. While still disagreeing, homeowners and the highest income households are less likely to disagree than the lowest income households and those who are currently precariously housed.
- There are no meaningful differences by jurisdiction, income, or housing tenure, and modest differences by respondent characteristics related to indicators of park quality or convenient access to grocery stores. As noted above, African Americans are less likely to agree with indicator statements and seniors are more likely to agree.

Figure II-25.
Resident Perspectives on Healthy Neighborhood Indicators, by Jurisdiction



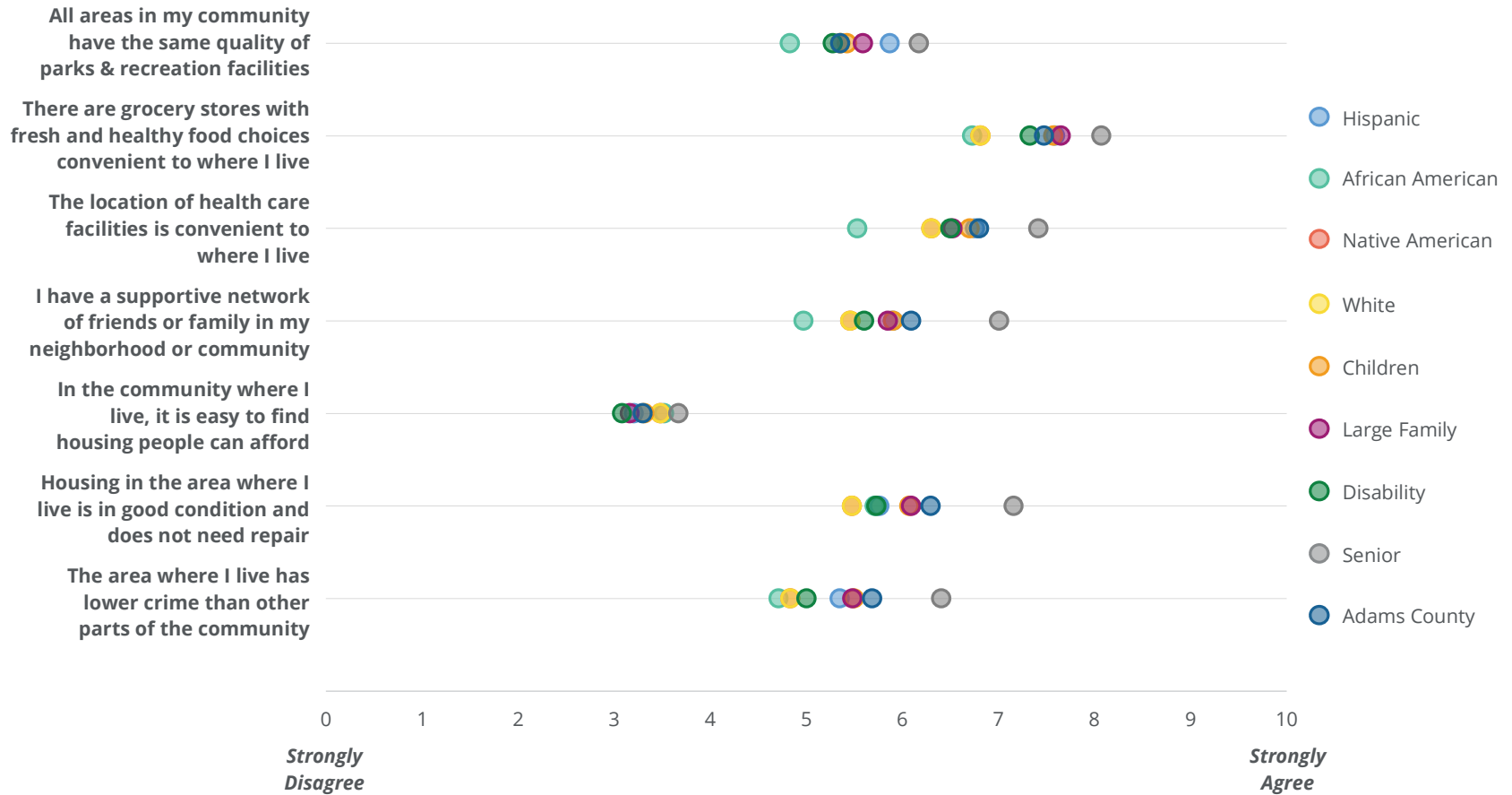
Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-26.
Resident Perspectives on Healthy Neighborhood Indicators, by Housing Situation and Income



Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-27.
Resident Perspectives on Healthy Neighborhood Indicators, by Select Respondent Characteristics



Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Access to Economic Opportunity

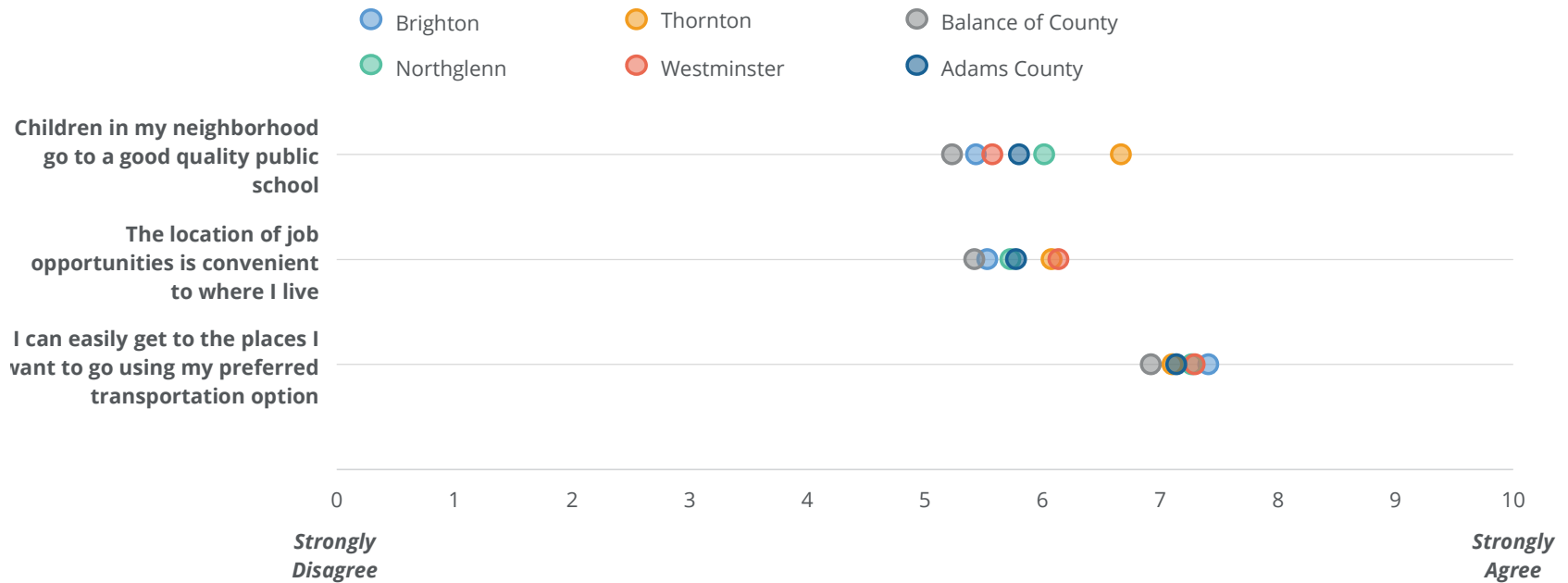
This section explores access to economic opportunity, particularly respondents' perceptions of access to quality public schools, job opportunities, and transportation access.

Indicators of access to economic opportunity. Survey respondents indicated the extent of their agreement with three indicators of access to economic opportunity in their neighborhood—"children in my neighborhood go to a good quality public school," "the location of job opportunities is convenient," and, "I can easily get to the places I want to go using my preferred transportation option." Figures II-28 to II-30 present residents' perspectives on access to economic opportunity by housing situation, income, and respondent characteristics.

In general, Adams County respondents somewhat agree that neighborhood children go to a good quality public school and that the location of job opportunities is convenient. They tend to agree that they can easily get where they need to go using their preferred mode of transportation.

- Among jurisdictions, Thornton residents are most likely to agree that neighborhood children attend quality public schools. While the differences are modest, Brighton and Balance of County residents are less likely than respondents from other jurisdictions to agree that neighborhood children go to quality public schools or that job locations are convenient.
- Regardless of income or housing tenure, respondents have almost the same perspective on the quality of neighborhood schools and the convenience of job locations. While still agreeing that they can easily get where they need to go, those who are precariously housed, have a housing subsidy, or household incomes less than \$25,000 are less likely to strongly agree.
- With the exception of seniors, members of protected classes somewhat agree that neighborhood children go to quality public schools. Native American, African American, and households that include a member with a disability are slightly less likely than others to agree that job locations are convenient. African American respondents are somewhat less likely to agree that they can easily get the places they need to go using their preferred mode of transportation. On each economic opportunity indicator, seniors gave the highest average ratings.

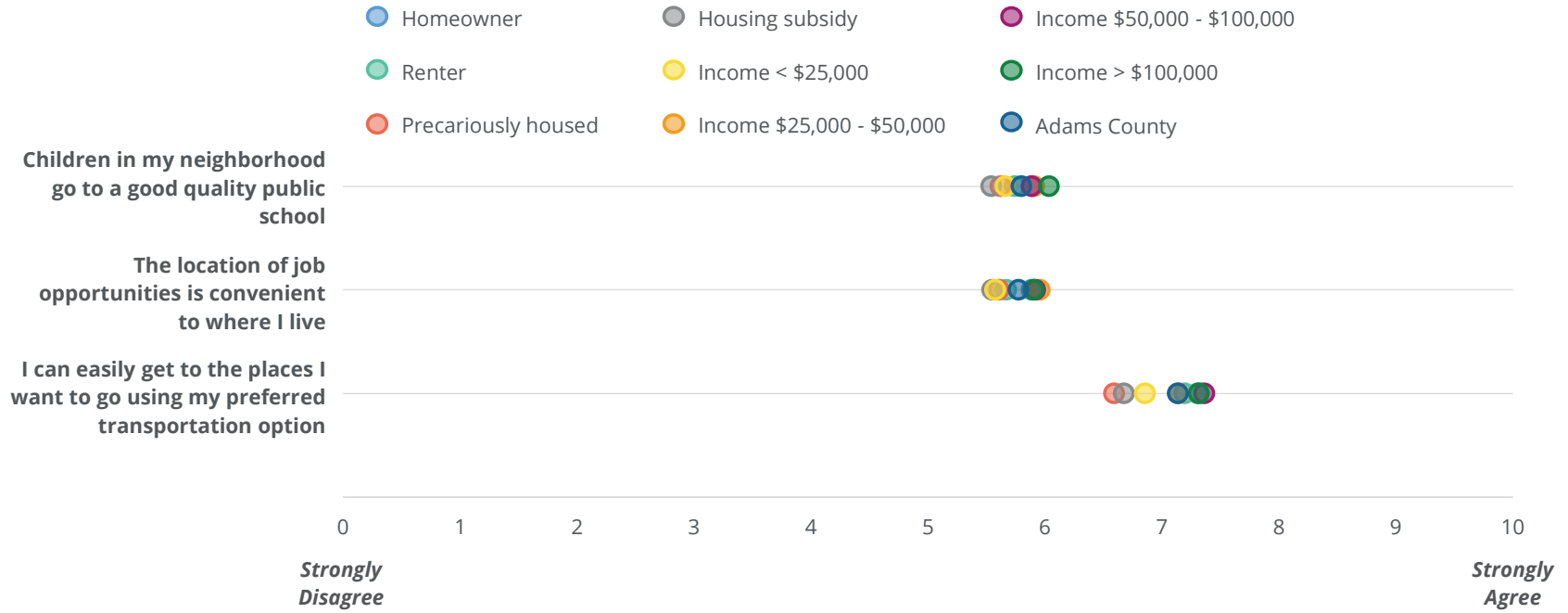
Figure II-28.
Access to Quality Schools, Transportation and Employment, by Jurisdiction



Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

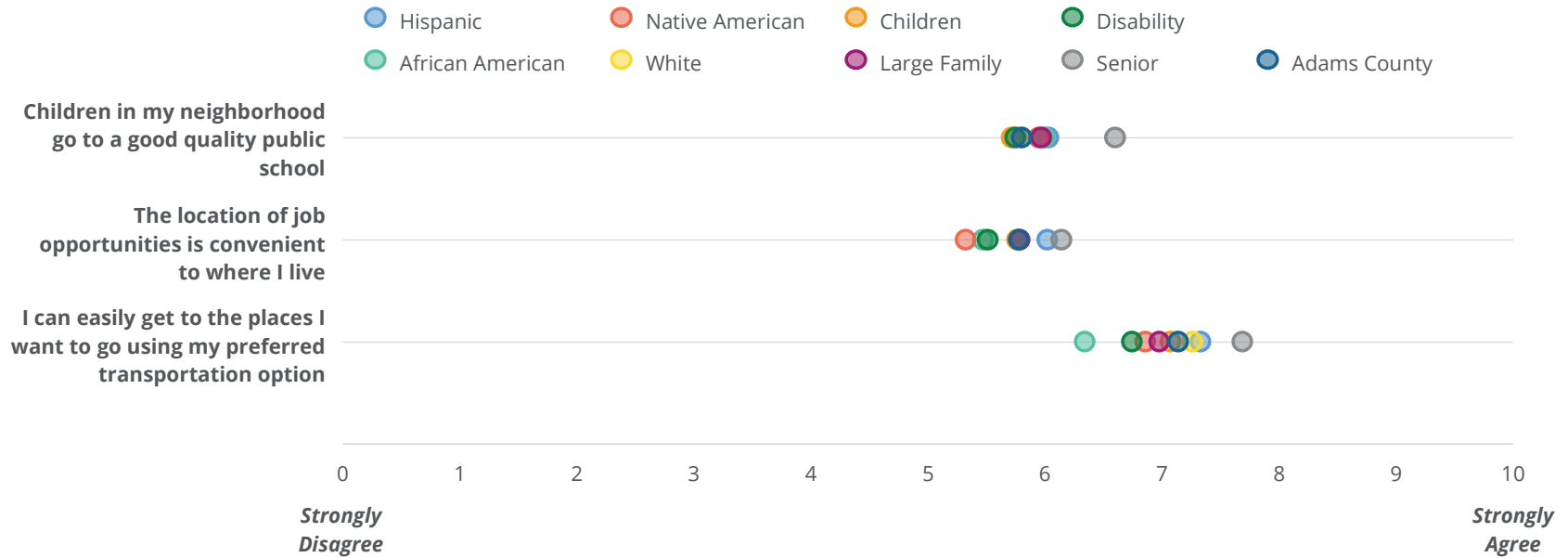
Figure II-29.

Access to Quality Schools, Transportation and Employment, by Housing Tenure and Income



Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure II-30.
Access to Quality Schools, Transportation and Employment, by Select Respondent Characteristics

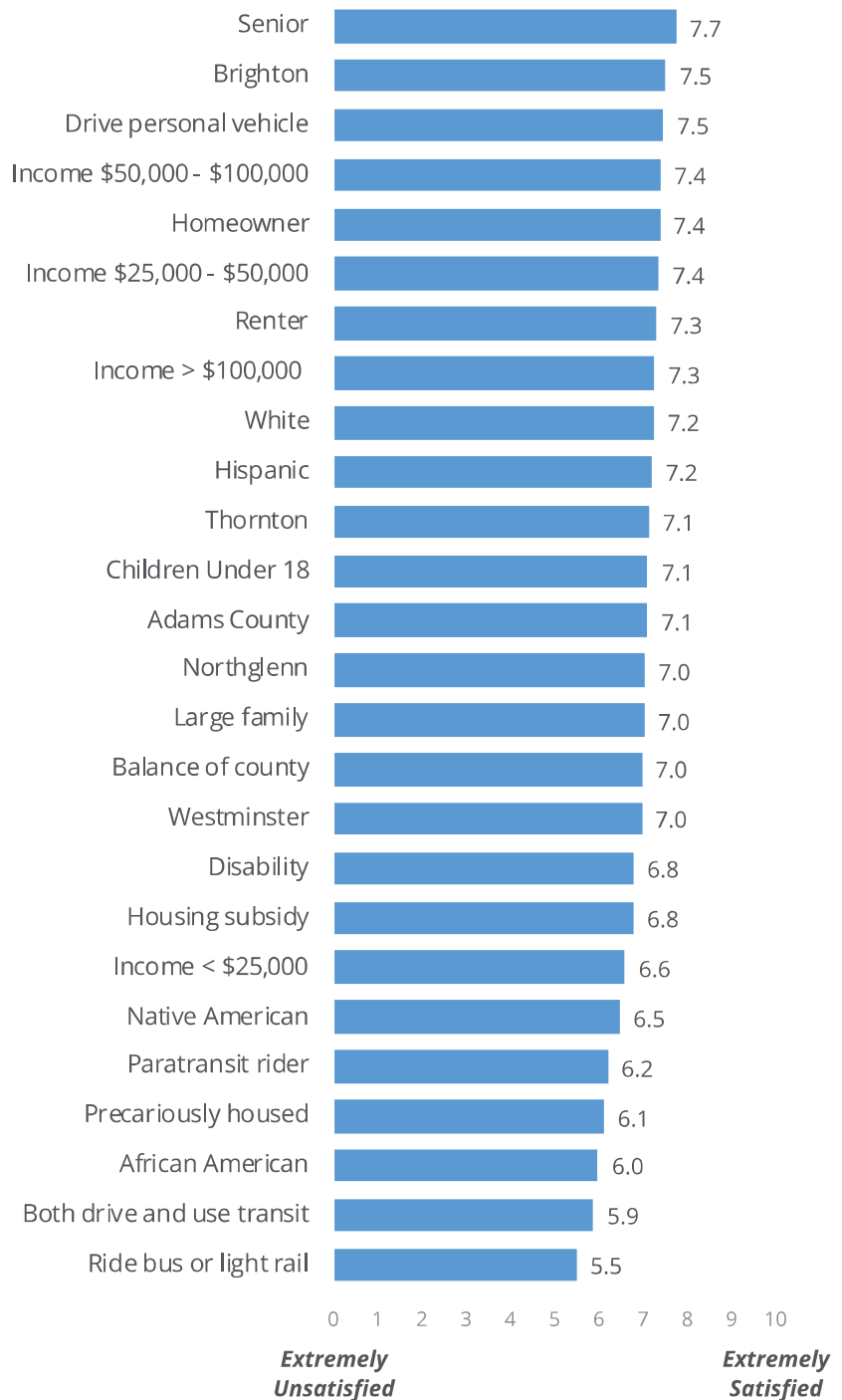


Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Transportation satisfaction. Figure II-31 shows that while most respondents are satisfied with their transportation situation, transit users and African Americans are not.

Figure II-31.
On a scale from 1 to 10, where 1 is “Extremely Unsatisfied” and 10 is “Extremely Satisfied,” how satisfied are you with your transportation situation?

Source:
 Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.



The reasons why respondents are unsatisfied with their transportation situation fall into four primary themes—problems with public transit, cost of transportation, desire to own a

vehicle, and car repair needs. Examples of why residents are unsatisfied related to vehicle repairs and public transit include:

Public transit—access, accessibility, efficiency, and routes

- *“Access to bus/other transit is almost zero. We have to walk more than a mile to reach a bus stop that really doesn’t go anywhere.” (Resident survey respondent)*
- *“Because if I didn’t have my car, I would not be able to get around because of my disabilities where I can’t walk enough to get to public transportation.” (Resident survey respondent)*
- *“My car is old and has lots of problems so I worry it will break down. But I need it to get my disabled son to school and we have many doctor’s appointments and therapy that are far and would take a long time on busses to get to. I am a single mother of three with one disabled child and disabled myself. So we have 2-3 appointments a week and if we had to use the bus my kids would miss a lot of school and/or I would be late to picking them up.” (Resident survey respondent)*
- *“Because there is only 1 bus that runs out into Brighton and is very limited and does not run on the weekends.” (Resident survey respondent)*
- *“Buses are expensive and unreliable.” (Resident survey respondent)*
- *“Hard getting around on the bus with 3 children.” (Resident survey respondent)*
- *“Light rail isn’t up and running yet. Purchased the home two years ago because of the light rail.” (Resident survey respondent)*

Cost of transportation

- *“At times I do not have gas money, or money for bus.” (Resident survey respondent)*
- *“Because I can’t afford the plates on my vehicle.” (Resident survey respondent)*
- *“Bus rates too high. Vehicle too old; can’t afford a new one.” (Resident survey respondent)*
- *“I have a driver’s license with a spotless driving record but can’t afford a car or insurance which would help me so much with job opportunities.” (Resident survey respondent)*

Desire to own a car

- *“I need my own car because the bus takes too long to get everywhere I need to be in one day.” (Resident survey respondent)*
- *“I would like to have my own transportation instead of borrowing.” (Resident survey respondent)*

Vehicle needs repair

- *“My car is in need of some major work, I can’t afford.” (Resident survey respondent)*

- *“My car is a ‘91 Buick with numerous issues I’m very grateful that I have a car that runs however I know it’s only a matter of time before it is unable to stay mobile the transmission is about to go.” (Resident survey respondent)*

Priority Outcomes

Residents attending Adams County Cares Day or the Thornton Harvest Festival had the opportunity to prioritize housing and community development outcomes most important to them. Each of the 195 participants was given three beans to allocate across 12 potential outcomes, including an option for the resident to “write in” their own preferred outcome; limiting choice to five outcomes reflected scarcity and forced residents to prioritize. The priorities each resident selected may already be true for the resident or are outcomes the resident wants to see from future community efforts.

These Adams County residents prioritize the following outcomes most when given only three “votes”:

- Safe neighborhoods. (62%)
- Preserving housing I can afford in my neighborhood. (31%)
- Good schools near housing I can afford. (29%)
- Ability to stay in rental unit and not be forced to move because rent becomes unaffordable. (28%)
- Access to quality parks or green space. (28%)
- Well-maintained sidewalks, street lights, and streets. (26%)
- Down-payment assistance to buy a home. (25%)
- Housing that is accessible for people with disabilities. (22%)
- More frequent transit service between my neighborhood and my work. (15%)
- Living closer to work/a shorter commute. (14%)
- Shopping and retail options in my neighborhood. (14%)

SECTION III.

DEMOGRAPHIC PATTERNS

SECTION III.

Demographic Patterns

This section examines demographic patterns that are associated with residential settlement, housing availability and affordability, and access to opportunity.

Primary Findings

- Adams County has some of the most racially, ethnically, and economically diverse neighborhoods in the Metro Denver region. Yet this was not always the case: early settlement patterns were marked by exclusion of people of color, immigrants, and lower income households. The county overall is now a “majority minority” community, with Federal Heights, Brighton, Thornton being the most ethnically diverse.
- Most households in the county and incorporated cities within the county are “family” households—largely comprised of married couple households with and without children. Single mother households make up 8 percent of households overall.
- The percentage of people living in poverty in Adams County has declined since 2010 and is now 12 percent. Poverty varies by race and ethnicity but is relatively low for all racial and ethnic groups, ranging between 7 and 11 percent. This is not true for single mothers, where one in five live in poverty.
- African Americans and persons of Hispanic descent have a median income that is 75 percent of the median income of non-Hispanic White households.
- A measure of segregation—the Dissimilarity Index, or DI—shows low levels of segregation for all groups in Adams County except African Americans, who face moderate levels of segregation.
- It is important to note that the data in this section are based on a pre-COVID-19 economy. The most recent data at the Census tract, jurisdiction, and county level are from the 2018 American Community Survey (ACS) and it is likely that these data provide an overly optimistic view of conditions given current circumstances. A special survey (“household pulse”) was conducted the week of June 4 to assess COVID-19 effects but it is only available at the state level.

Historical Context

Adams County—like other counties along the Front Range—was originally Native American land. The land was occupied by early settlers, many of whom moved West in search of gold and fur trapping. Adams County thrived as a center of agriculture, with some of the first irrigation ditches in the region and several railroad depots.

Industry boomed in Adams County with the development of the Suncor Oil Refinery in the 1930s and the Rocky Mountain Arsenal in 1942. The Arsenal would be used to produce chemical weapons in World War II, agricultural herbicides and pesticides, weapons production in the Cold War, and rocket fuel used by Apollo 11.¹

The county's primary industry base of agriculture, manufacturing, and oil and gas attracted a range of families to the suburban county seeking residence near places of work. Between the 1940s and 1960s, substantial subdivision platting occurred in unincorporated Adams County on land that lingers outside of cities today. Early industry paired with several master planned communities and post-war residential construction rendered Adams County a relatively affordable option, particularly for working class households seeking homeownership.

Factors contributing to segregation in the Denver Metro Area. During the post-World War II economic expansion, several public policies promoted racial and ethnic segregation within neighborhoods, broadly believed to ensure neighborhood stability. These policies and practices used to prevent mixing of ethnic and racial groups affect the geographic distribution of these groups today. Public policies and practices used during this time in the Denver area commonly included:

- **Deed restrictions and restrictive covenants.** Covenants and other deed restrictions explicitly preventing racial and ethnic mixing within neighborhoods were common practice in the 1940s, 1950s, and 1960s—during the building boom in Metro Denver suburban areas. Standard restrictions included physical attributes of development (e.g., setbacks, size of homes, utility easements) while some developers—primarily of affluent suburbs—used restrictive covenants to exclude buyers based on race, religion, social class, and economic status.
- **Lending practices.** Construction and homeownership loans backed by the Federal Housing Administration (FHA) spurred the post-war housing boom but did not benefit all populations equally. Residential security maps—also known as “redlining” maps because of the shading used to designate undesirable neighborhoods—were used starting in the 1930s to determine the desirability of neighborhoods for capital investment. The presence of non-White residents and immigrants determined, in part, the rating of the neighborhood.
- **Growth limitations.** In the Denver region, growth controls have, in part, facilitated racial, ethnic, and poverty concentrations. For example, one of the most significant contributors to racial concentration in the City and County of Denver was the Poundstone Amendment. The goal of this amendment, passed in the mid-1970s, was to prevent the City of Denver from expanding, for fear that Denver Public Schools

¹ <https://coloradoencyclopedia.org/article/adams-county#Map>

would reach into suburban areas. Mandated busing also led to concentrations within the City and County of Denver, as non-Hispanic White residents moved into the suburbs.

- **Discriminatory behavior.** African American/Black residents who moved out of historically segregated neighborhoods in Denver often faced discrimination from existing residents in suburban communities. According to the *Historic Residential Subdivisions of Metropolitan Denver, 1940-1965*:

Historians Leonard and Noel [co-authors of “Denver: Mining Camp”] write that when the African American Tracy Smith family moved to Northglenn in 1962, hundreds of people drove to their house and “gaped” at them. When Sylvester Hill, a black photographer, moved into Thornton in the early 1960s with his white wife, the builder of the house tried to return their deposit and demanded that they vacate. A City Council member alleged “certain members of the police department were ‘inciting residents’ and delivering illegal eviction notices to the Hills.”

History of settlement of Adams County communities.

Jurisdictions in Adams County experienced similar post-war growth that has largely determined settlement patterns and socioeconomic diversity in these communities today.

- **Bennett** was originally a homestead known as the Bennett Ranch; the town officially incorporated in 1930. One of the original homesteaders, MR. H. P. Bennett was the third Postmaster of Denver in 1869.² Bennett has remained a largely rural town—yet, according to its recent Comprehensive Plan, welcomes future growth, particularly for working families: “The Town of Bennett, Colorado, is uniquely positioned to capture the next wave of growth within the Denver metropolitan area. Bennett’s close proximity to Denver International Airport (DIA), the Front Range Airport, I-70, E-470, and the Union Pacific Railroad are all factors that will have a direct impact on the future growth of the Town.”³
- **Brighton** was originally home to Arapahoe and Cheyenne Native Americans, and the Cheyenne farmed and grew crops in the area. The fur trade and gold rush increased traffic to Brighton in the early 1800s. Gold-seekers soon turned to agriculture to earn income and five ranches formed along the Platte River in 1859 near present day Brighton. The town was incorporated in 1887, and the final big agricultural name left the area in 1977, with the closing of the Great Western Sugar Company.⁴ Early immigrants and migrant workers including Germans from Russia, Japanese, and Mexicans were attracted to the area to work in agriculture. In 1904, Brighton became

² https://townofbennett.colorado.gov/sites/townofbennett/files/2020_BennettCommunityProfile_Small.pdf

³ https://townofbennett.colorado.gov/sites/townofbennett/files/Bennett%20Comp%20Plan_1.pdf

⁴ <https://www.brightonco.gov/DocumentCenter/View/73/City-of-Brighton-History?bidId=>

the county seat of Adams County.⁵ Brighton remained relatively small for many decades. Recent growth has been strong, facilitated by new residential subdivisions.

- **Federal Heights** was incorporated in 1940 and gained its name from Federal Boulevard, a main thoroughfare in the Denver region. The town itself only occupies 1.8 square miles.⁶ The town began as a, “small collection of houses just west of Federal Boulevard” that incorporated primarily to resolve water problems in the area and fund a new water well. During the war, Federal Heights, “welcomed the makeshift homes that other areas spurned,” and became an affordable place for wartime workers to live.⁷ In 1964, the mobile home resort park Holiday Hills opened on 60 acres making it, “...the largest mobile home park in the country in terms of acres...” Holiday Hills opened with 486 mobile homes and remains a large portion of the housing units available in Federal Heights.⁸ According to the 2018 American Community Survey (ACS) five-year estimates, 44 percent of housing units in Federal Heights are mobile homes.
- **Northglenn** formed from the 280-acre pre-planned subdivision developed by Perl-Mack Co beginning in 1959. By 1962, the subdivision had grown to 10,000 residents and 3,000 homes. The development received national recognition and was named “The most perfectly planned community in America” by Life magazine and the National Association of Home Builders in 1961.” Sales in the first six days were attributed to the extensive advertising campaign and reached \$1.375 million spent on properties. Most of the houses sold under VA or FHA financing, meaning African Americans were excluded from the planned community.⁹ The city incorporated in 1959 and enjoyed major economic growth through the 1970s.¹⁰
- **Thornton** began as a master planned community and was named to honor the then Governor of Colorado, Dan Thornton.¹¹ Homes in Thornton sold primarily to World War II Veterans and were originally all brick construction. This was disrupted in 1954, with plans to construct 350 frame homes, which was met with outrage: residents expressed concern about the wood frame construction lowering property values and “racial and ethnic mixing.” After the builder attempted to vacate an interracial couple who had a contract on one of the frame homes, the Colorado Anti-Discrimination

⁵ <https://www.codot.gov/programs/research/pdfs/2011/suburbs.pdf>

⁶ <https://www.fedheights.org/?SEC=5F840C36-5461-495E-A8B6-E4797309FC45>

⁷ <https://www.codot.gov/programs/research/pdfs/2011/suburbs.pdf>

⁸ <https://www.codot.gov/programs/research/pdfs/2011/suburbs.pdf>

⁹ <https://www.codot.gov/programs/research/pdfs/2011/suburbs.pdf>

¹⁰ https://www.northglenn.org/residents/about_northglenn/history.php

¹¹ https://www.thorntonco.gov/about/Pages/thornton_history

Commission filed a complaint.¹² Recent development in Thornton is characterized by a range of housing types, from master planned townhome/low maintenance communities to solar-powered communities to executive homes.

- Westminster** began as the Village of DeSpain Junction, a small farming community attracting early settlers in the 1800s and was later the site of many fruit farmers. The City incorporated in 1911, named after a Presbyterian university.¹³ Unprecedented growth in the 1940s set the stage for a series of growth management efforts that still influence the city’s growth (and were challenged and upheld by the Colorado Supreme Court). Annexations in the post-World War II years drove growth in Westminster. In the 1940s and 1950s there were 30 annexations followed by 22 annexations in the 1960s and 69 in the 1970s. These annexations brought water rights to the city that would later be used to allocate service and limit growth of new development. The Denver-Boulder Turnpike attracted developers to the area, but also divided the city in half impeding access between the north and south parts of the city.¹⁴

Growth and Diversity

Since 2000, the Denver region has experienced significant growth. Adams County alone added over 70,000 residents in the past eight years—a 16 percent increase in population. In comparison, Jefferson County experienced the lowest percent increase of 9 percent, and Weld County experienced the highest percent increase in population of 24 percent. Recent growth in Adams and Weld Counties is likely a result of affordability pressures in Denver and the availability of developable land in counties to the northeast of the city center.

**Figure II-1.
Population
Change by County,
2010-2018**

Source:
2010 Census and 2018 ACS 1-year
estimates, Root Policy Research.

| County | 2010 | 2018 | Change | |
|-------------------------|---------|---------|--------|---------|
| | | | Number | Percent |
| Adams County | 441,603 | 511,868 | 70,265 | 16% |
| Arapahoe County | 572,003 | 651,215 | 79,212 | 14% |
| Jefferson County | 534,543 | 580,233 | 45,690 | 9% |
| Weld County | 252,825 | 314,305 | 61,480 | 24% |

By city within the county, the strongest growth since 2010 occurred in Brighton and Thornton. Cities with the lowest growth include Bennett, Westminster, and Federal Heights.

¹² <https://www.codot.gov/programs/research/pdfs/2011/suburbs.pdf>

¹³ <https://www.cityofwestminster.us/WestminsterHistory>

¹⁴ <https://www.codot.gov/programs/research/pdfs/2011/suburbs.pdf>

**Figure II-2.
Population Change by
Jurisdiction, 2010-2018**

Source:
2018 and 2010 ACS 5-year estimates,
Root Policy Research.

| Jurisdiction | 2010 | 2018 | Change | |
|-----------------|---------|---------|--------|---------|
| | | | Number | Percent |
| Bennett | 2,186 | 2,202 | 16 | 1% |
| Brighton | 31,181 | 39,054 | 7,873 | 25% |
| Federal Heights | 11,586 | 12,645 | 1,059 | 9% |
| Northglenn | 35,127 | 38,918 | 3,791 | 11% |
| Thornton | 112,374 | 134,588 | 22,214 | 20% |
| Westminster | 104,869 | 112,747 | 7,878 | 8% |
| Adams County | 425,330 | 497,115 | 71,785 | 17% |

Familial status. The vast majority of households in Adams County are family households (71%). Nearly one in four households in the county are married with children and another one in four are married without children. Eight percent are single mothers. Countywide, 29 percent of households are non-family—roommates, unrelated people living together, and single people living alone.

Thornton and Brighton have the largest shares of married families with children at 27 and 25 percent, respectively. Northglenn and Westminster have the highest overall share of non-family households at 35 percent of all households in both jurisdictions. Federal Heights has the highest share of single mother households at 15 percent of households, compared to the countywide average of eight percent.

**Figure II-3.
Household Type by Jurisdiction, 2010-2018**

| Jurisdiction | Family Households | | | | | Non-family households |
|-----------------|-----------------------|-----------------------|----------------------|---------------|------------------------|-----------------------|
| | All family households | Married with children | Married, no children | Single mother | Other family household | |
| Bennett | 67% | 17% | 40% | 4% | 7% | 33% |
| Brighton | 72% | 25% | 29% | 9% | 10% | 28% |
| Federal Heights | 67% | 21% | 19% | 15% | 13% | 33% |
| Northglenn | 65% | 20% | 25% | 8% | 14% | 35% |
| Thornton | 73% | 27% | 27% | 8% | 11% | 27% |
| Westminster | 65% | 20% | 30% | 6% | 10% | 35% |
| Adams County | 71% | 24% | 26% | 8% | 12% | 29% |

Source: 2018 and 2010 ACS 5-year estimates, Root Policy Research.

Disability. More than 52,000 individuals in Adams County have at least one disability—equivalent to 10 percent of the total population. Disabilities are most prevalent among older populations. As shown below, one in four residents between 65 and 74 years old have a disability and more than half of individuals 75 years and older have a disability.

**Figure II-4.
Disability by Age Group,
Adams County, 2018**

Source:
2018 ACS 1-year estimates, Root Policy
Research

| | Total Population | With a Disability | % with a Disability |
|-------------------|---------------------|----------------------|------------------------|
| Under 5 years | 36,106 | 68 | 0.2% |
| 5 to 17 years | 99,640 | 5,284 | 5.3% |
| 18 to 34 years | 127,604 | 7,267 | 5.7% |
| 35 to 64 years | 193,033 | 21,395 | 11.1% |
| 65 to 74 years | 32,940 | 8,299 | 25.2% |
| 75 years and over | 19,280 | 9,880 | 51.2% |
| Total | 508,603 | 52,193 | 10.3% |

Ambulatory and cognitive disabilities are the most prevalent in Adams County. Generally, older adults are more likely to suffer from an ambulatory difficulty while youth (under 17 years old) are more likely to suffer from a cognitive difficulty.

**Figure II-5.
Disability by Type, Adams
County, 2018**

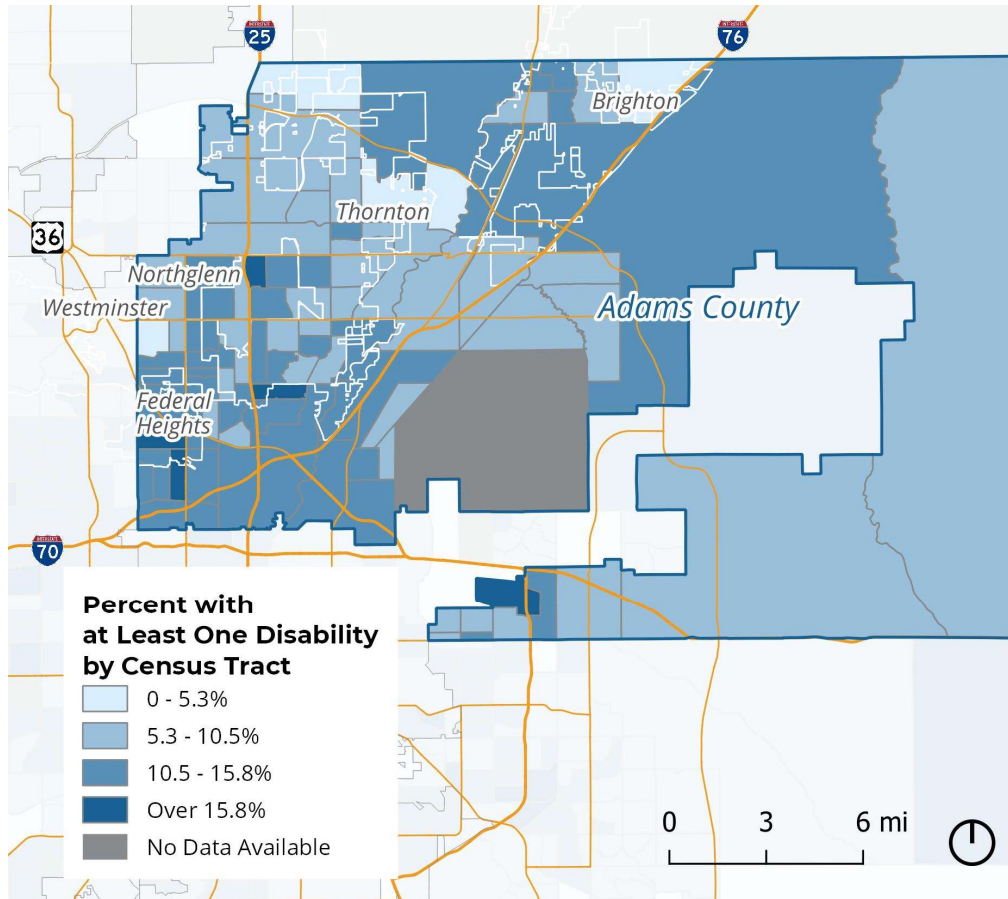
Source:
2018 ACS 1-year estimates, Root Policy
Research

| | With a Disability | % of Total Population |
|-------------------------------|----------------------|--------------------------|
| Population with a disability | 52,193 | 10.3% |
| With a hearing difficulty | 15,515 | 3.1% |
| With a vision difficulty | 11,155 | 2.2% |
| With a cognitive difficulty | 19,858 | 4.2% |
| With an ambulatory difficulty | 23,134 | 4.9% |
| With a self-care difficulty | 9,285 | 2.0% |

Figure II-6 shows the percent of residents with a disability by Census tract in Adams County and select jurisdictions. Census tracts with more than 15 percent of residents with a disability are considered to be concentrated, using the definition of 1.5 times the overall proportion.

The map suggests that, overall, residents with a disability are relatively evenly distributed throughout Adams County; five Census tracts indicate a concentration. These are mostly located in the Federal Heights and Northglenn areas.

Figure II-6.
Percent of Residents with at Least one Disability by Census Tract,
Select Cities, Adams County, 2018

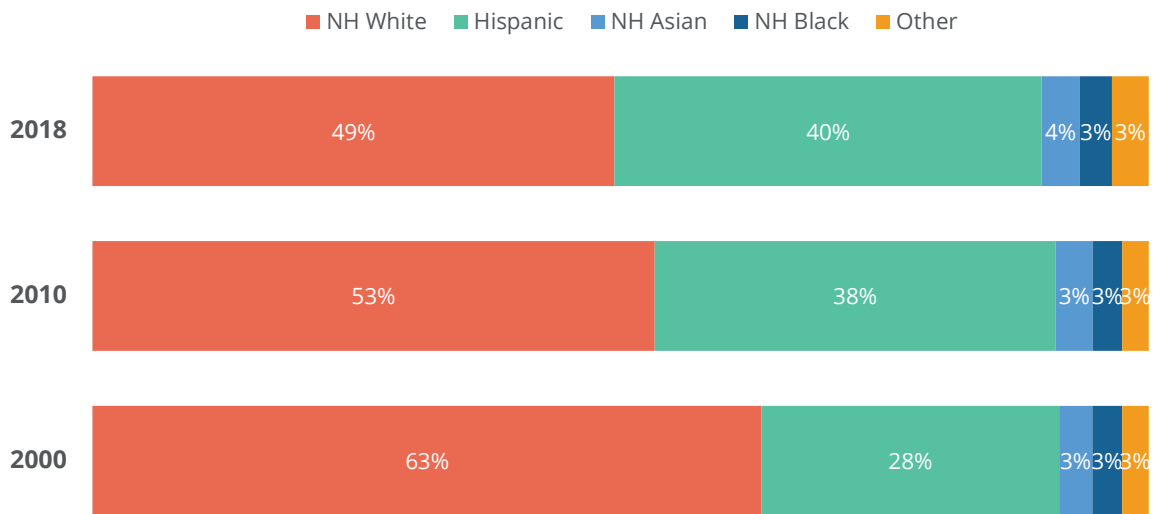


Note: Breaks represent 50%, 100%, and 150% of the county proportion of residents with a disability (10.5%)

Source: 2018 ACS 5 year estimates and Root Policy Research

Race and ethnicity. Figure II-7 shows the race and ethnicity of residents in the county. The county has become more ethnically diverse as it has grown: As of 2018, non-Hispanic White residents were slightly less than half of the county's population, compared with 63 percent in 2000. The largest single racial or ethnic group is residents of Hispanic descent, comprising 40 percent of the county's population. From 2000 to 2018, the Hispanic population increased by more than 100,000 individuals, effectively doubling the size of this population in the county. The increase in Hispanic residents accounted for more than half (56%) of the countywide population growth between 2010 and 2018.

Figure II-7.
Distribution of Race and Ethnicity, Adams County



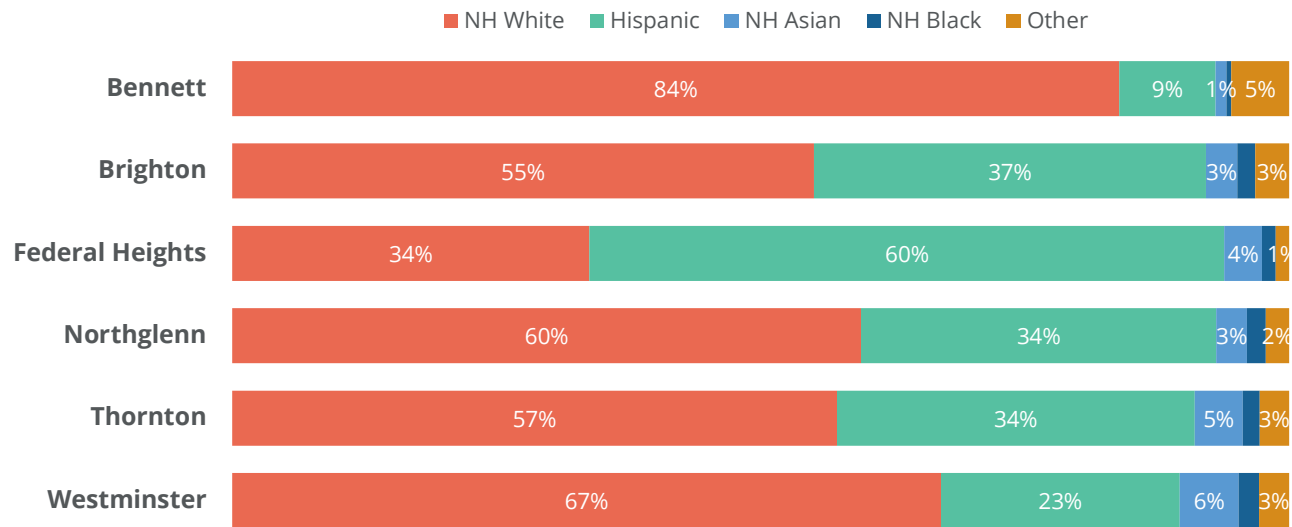
Note: "NH" refers to non-Hispanic.

Source: 2000 and 2010 Census, 2018 ACS 1-year Estimates, Root Policy Research.

Racial and ethnic distribution differs by jurisdiction. Bennett and Westminster have the largest population of non-Hispanic White residents, with 84 percent and 67 percent of residents, respectively. These cities also have the smallest proportions of Hispanic residents at 9 percent and 23 percent. By comparison, Federal Heights' population has the highest share of Hispanic and non-White residents compared to other jurisdictions. In Federal Heights, 60 percent of residents are of Hispanic descent; 34 percent are non-Hispanic White. Federal Heights' large proportion of residents who identify as racial and ethnic minorities is likely due to the relative affordability of the aging housing stock and significant presence of mobile home communities.

The cities and the county overall have very few African American/Black residents, and the proportion of African American residents has changed little since 2000. As discussed in other sections in this AI, despite their relatively small population in the county, African Americans are more likely than other groups to face housing challenges.

Figure II-8.
Distribution of Race and Ethnicity, by Jurisdiction

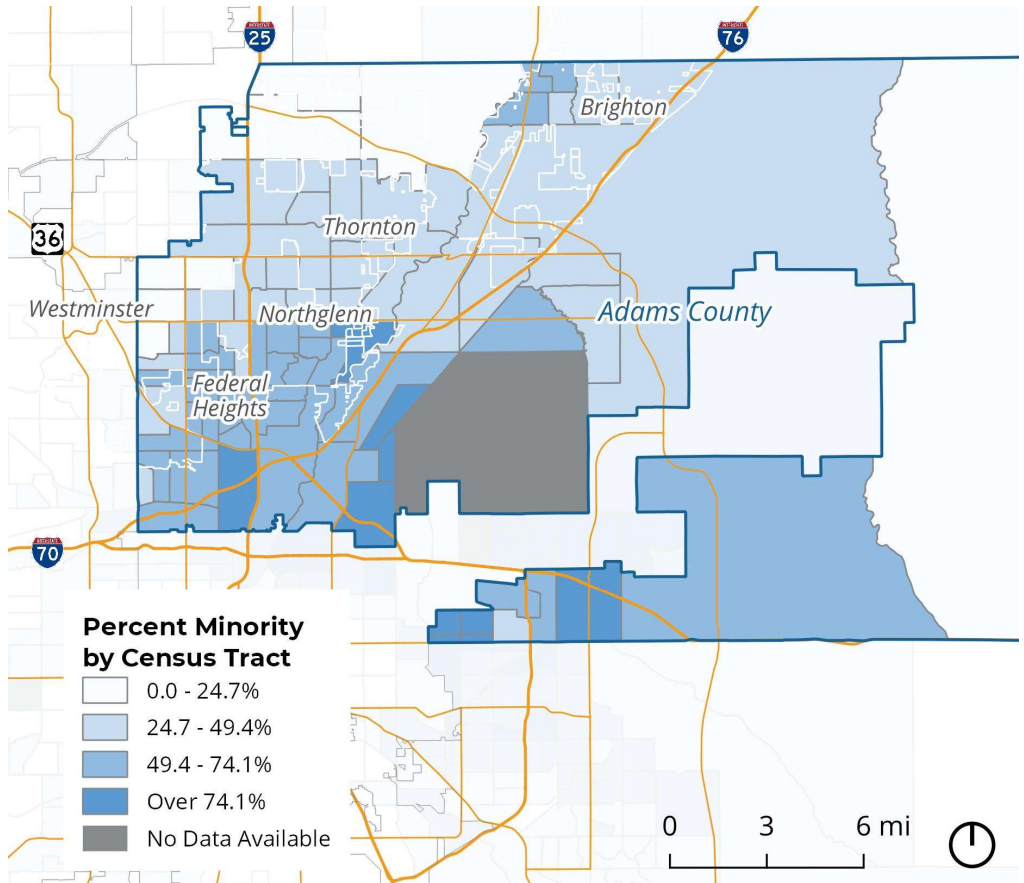


Source: 2018 ACS 5-year Estimates, Root Policy Research.

Geographic concentration of people of color. For the purposes of this section, a geographic concentration of a demographic group is defined as a Census tract with 150 percent (or 1.5 times) of the county proportion of that group. For example, if 10 percent of residents are Asian but the Asian population of a specific Census tract is 15 percent, that tract would be “concentrated.”¹⁵ Figure II-9 shows the percent of non-White and Hispanic—collectively “minority”—residents by Census tract. Census tracts with more than 74 percent of non-White and Hispanic (minority) residents are considered a concentration. Minority concentrations exist in 10 Census tracts in the southwest areas of Adams County including one tract in each of Northglenn and Thornton. The remaining tracts are located in Commerce City and in unincorporated Adams County.

¹⁵ Census tracts boundaries do not always correspond with municipal boundaries. Concentrated Census tracts are identified in each municipality in which they are located, which results in the same concentrated Census tracts being identified in multiple municipalities. Total tracts in the county, however, will not have duplicative counts.

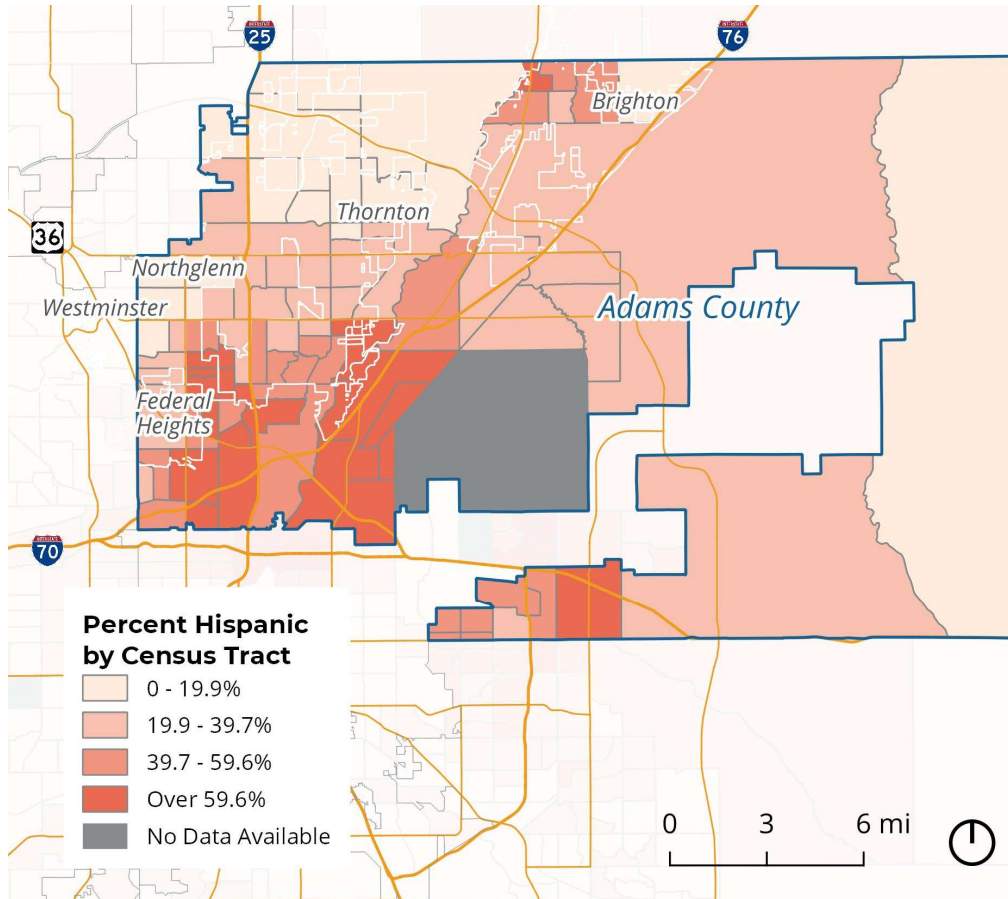
Figure II-9.
Percent “Minority” Residents by Census Tract, Jurisdictions and Adams County, 2018



Note: Breaks represent 50%, 100%, and 150% of the county proportion of non-White and Hispanic residents (49.4%)
 Source: 2018 ACS 5 year estimates and Root Policy Research

Figure II-10 shows the percent of Hispanic residents by Census tract in Adams County and select jurisdictions. Concentrations occur when Census tracts are more than 59.5 percent Hispanic. There are 20 Census tracts in the western area of Adams County with a concentration of Hispanic residents. Among these Census tracts there are 96,501 total residents and 64,386 Hispanic residents. These tracts are located in Aurora (1) Brighton (1) Federal Heights (4), Thornton (6), and Westminster (2), and Commerce City (6); four are unincorporated Adams County.

Figure II-10.
Percent Residents of Hispanic Descent by Census Tract, Jurisdictions and
Adams County, 2018



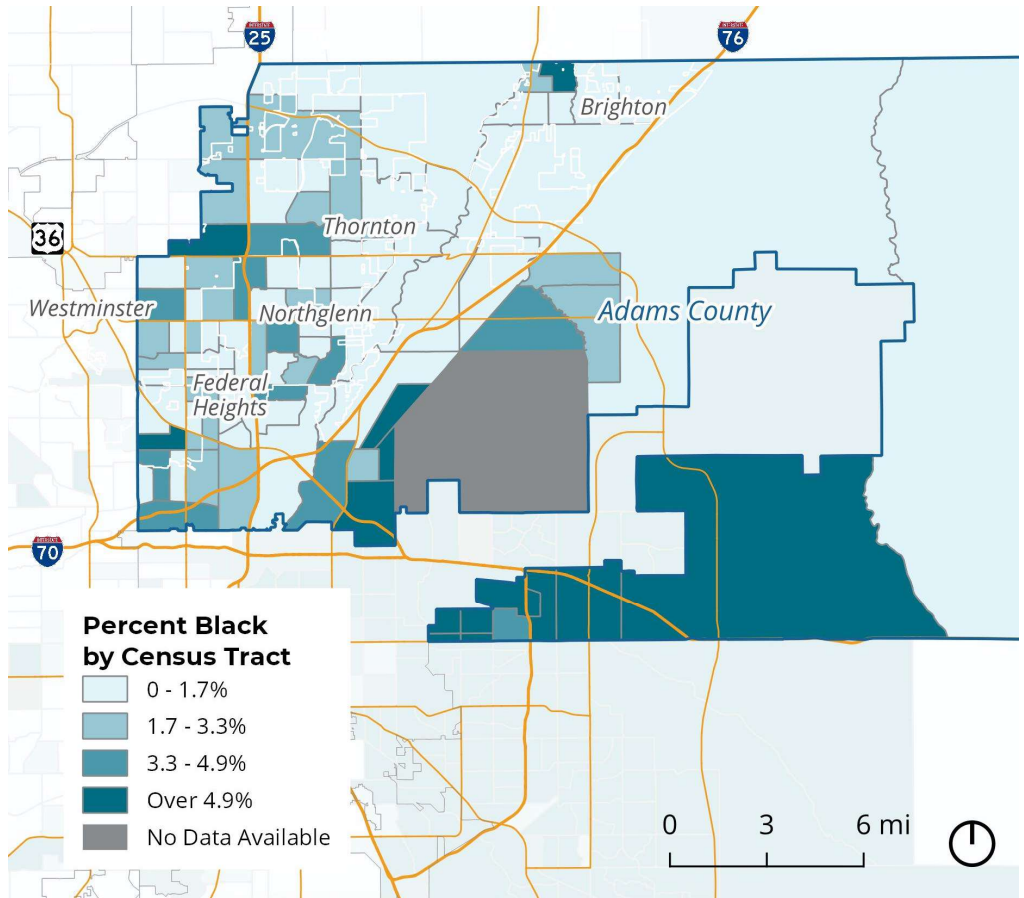
Note: Breaks represent 50%, 100%, and 150% of the county wide proportion of Hispanic residents (39.7%)

Source: 2018 ACS 5 year estimates and Root Policy Research

Figure II-11 shows the percent of African American/Black residents by Census tract in Adams County and select jurisdictions. As mentioned earlier, African American/Black residents make up a very small proportion of residents in the county overall, yet report some of the greatest housing challenges in the resident survey.

In this case, concentrations occur when just 4.9 percent of residents report their race as African American/Black. There were 14 Census tracts in Adams County with African American/Black concentrations. These tracts represent a total of 77,472 residents and 9,229 African American/Black residents. Most of the Census tracts containing a concentration of Black residents are located in Aurora (8). Additional concentrated tracts are in Westminster (2), Commerce City (3), and Brighton (1).

Figure II-11.
Percent Black Residents by Census Tract, Jurisdictions and Adams County, 2018

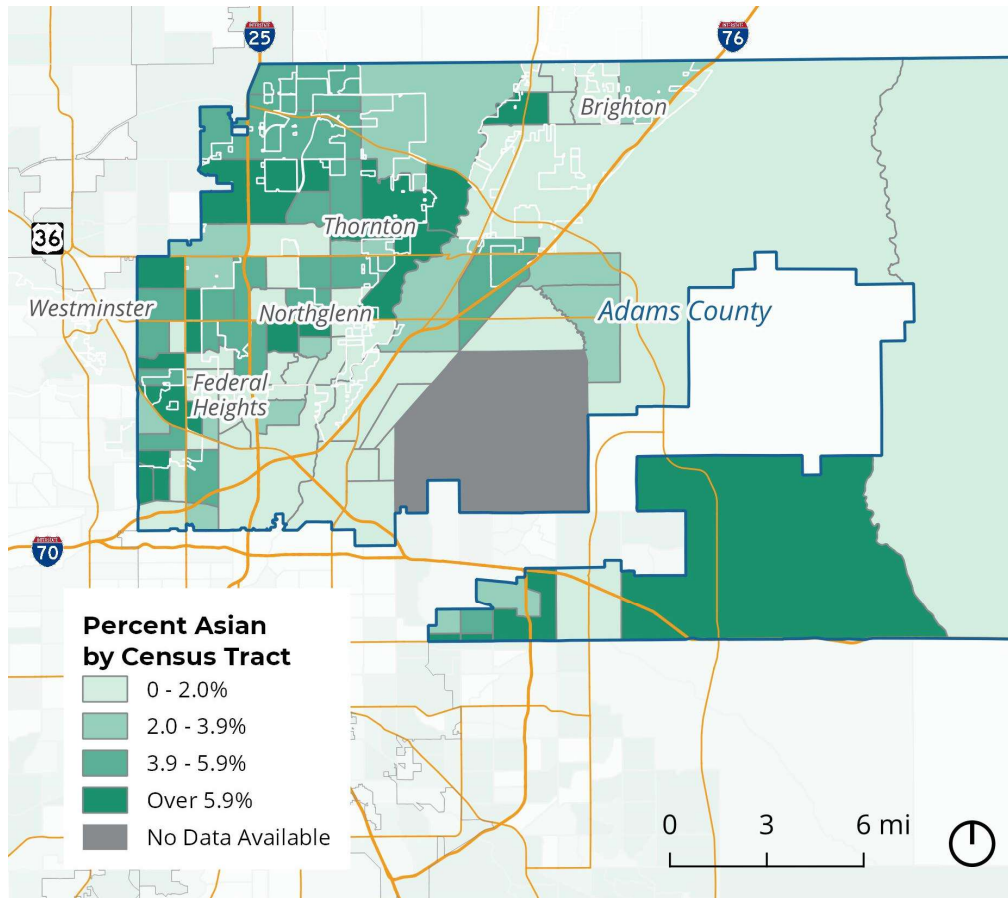


Note: Breaks represent 50%, 100%, and 150% of the county wide proportion of Black residents (3.3%)
 Source: 2018 ACS 5 year estimates and Root Policy Research

Figure II-12 shows the percent of Asian residents by Census tract in Adams County and select jurisdictions. Like African American residents, Asian residents make up a relatively

small proportion of residents overall. Census tracts with 5.9 percent and more Asian residents are considered a concentration. There are 23 Census tracts with a concentration of Asian residents; these are located in Federal Heights (1), Westminster (8), Thornton (8) and Aurora (5) and Brighton (1). These tracts represent 108,692 total residents and 9,877 Asian residents.

Figure II-12.
Percent Asian Residents by Census Tract, Jurisdictions and Adams County, 2018

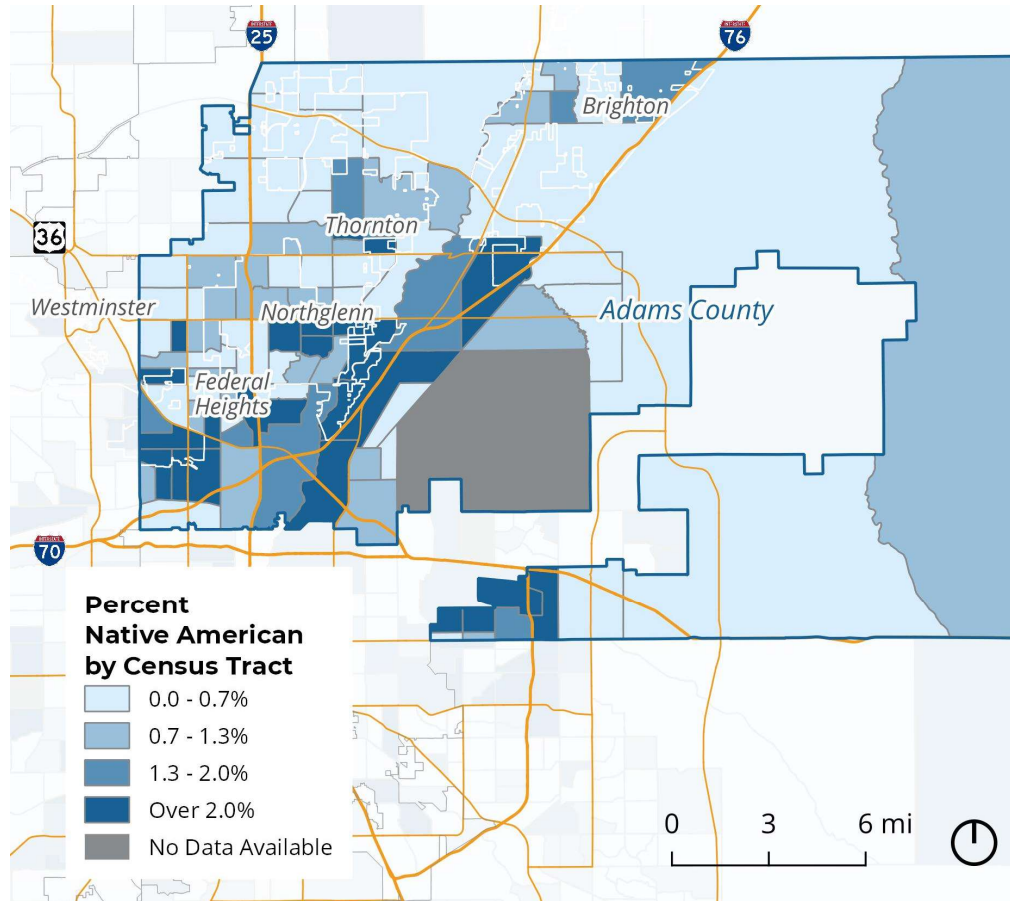


Note: Breaks represent 50%, 100%, and 150% of the county wide proportion of Asian residents (3.9%)

Source: 2018 ACS 5 year estimates and Root Policy Research

Figure II-13 shows the percent of Native American residents by Census tract in Adams County and select jurisdictions. Census tracts with more than 2.0 percent Native American residents are considered a concentration. There are 22 such tracts in Adams County. These tracts represent 110,176 total residents and 3,483 Native American residents. The tracts with a concentration of Native American residents are located in the urbanized areas in the southwest area of Adams County including Aurora (4), Thornton (9), Westminster (6), and Commerce City (3).

Figure II-13.
Percent Native American Residents by Census Tract, Jurisdictions and
Adams County, 2018



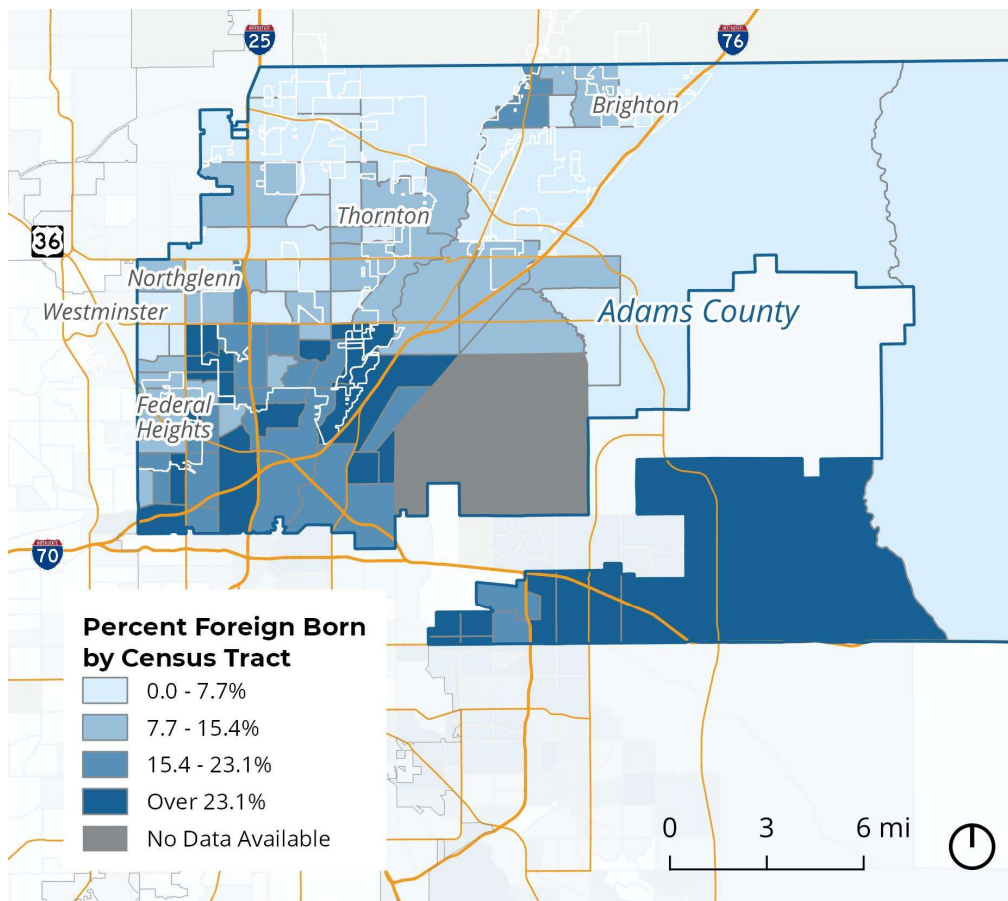
Note: Breaks represent 50%, 100%, and 150% of the county wide proportion of Native American residents (1.3%)

Source: 2018 ACS 5 year estimates and Root Policy Research

National origin and limited English proficiency (LEP). Sixteen percent of the residents in Adams County—about 80,000—was born outside the U.S. Of these, 40 percent are naturalized citizens. The vast majority of foreign born residents countywide were born in Latin America (73%); 17 percent were born in Asia. The country of origin accounting for the most foreign born residents is Mexico, accounting for over 50,000 residents. This is followed by El Salvador with a much smaller 1,500 residents.

Figure II-14 shows the percent of foreign born residents by Census tract. Concentrations occur in Census tracts with more than 23.1 percent foreign born residents and are mostly found in the southwest and southeast areas of the county.

Figure II-14.
Percent Foreign Born by Census Tract, Jurisdictions and Adams County, 2018



Note: Breaks represent 50%, 100%, and 150% of the county wide proportion of Foreign Born residents (15.4%)

Source: 2018 ACS 5 year estimates and Root Policy Research.

As shown in Figure II-15, about 29 percent of the Adams County population over the age of five speaks a language other than English at home. Overall in the county, 12 percent of the

population is limited English proficiency, or LEP, persons—i.e., they speak English less than “very well” according to the Census LEP—with Spanish being the dominant language of those who are LEP. Spanish speakers account for about 24 percent of the population overall, with LEP Spanish speakers accounting for 10 percent of the county’s population.

Figure II-15.
Percent of Residents by Language and Proficiency, 2018

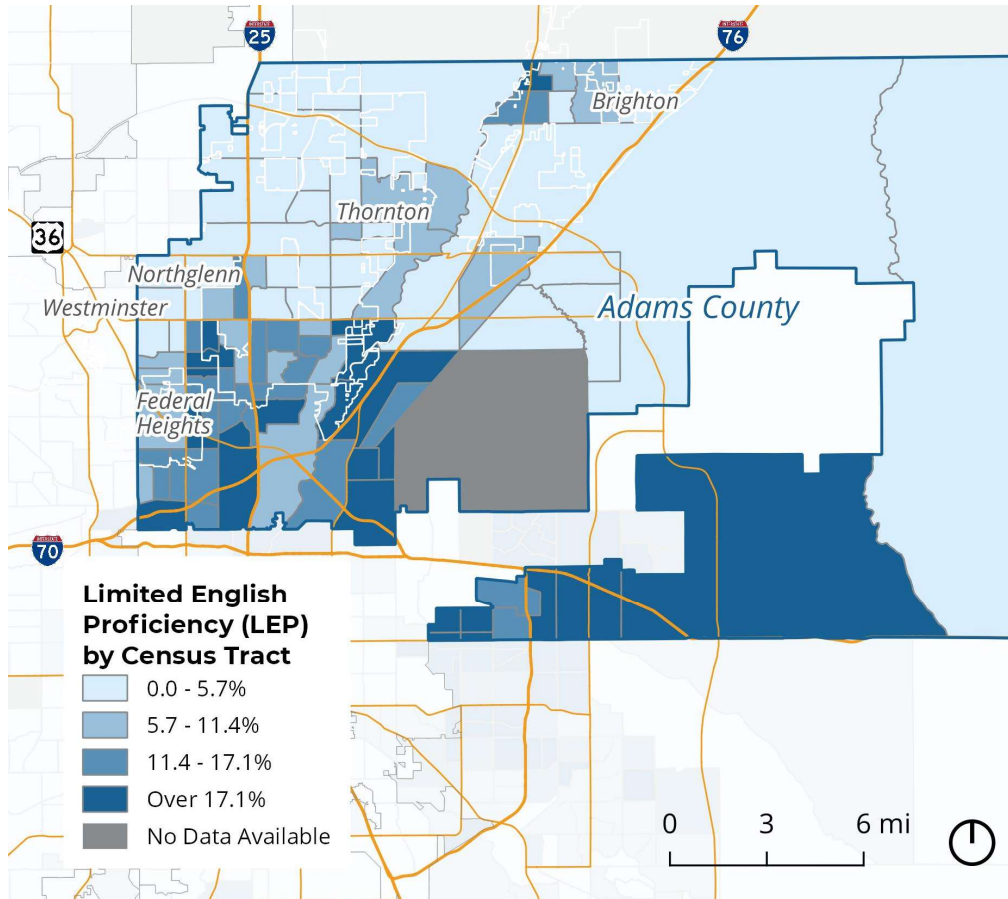
| | Total in Language Group | | Limited English Proficient | |
|--|-------------------------|------------------|----------------------------|------------------|
| | Number | Total Population | Number | Total Population |
| Population | 475,762 | 100% | | |
| Speak language other than English at home | 137,201 | 28.8% | 57,401 | 12.1% |
| Spanish | 113,135 | 23.8% | 47,148 | 9.9% |
| Other Indo-European languages | 12,256 | 2.6% | 4,594 | 1.0% |
| Asian and Pacific Island languages | 8,380 | 1.8% | 4,441 | 0.9% |
| Other Languages | 3,430 | 0.7% | 1,218 | 0.3% |

Note: Population numbers refer to the population 5 years and over.

Source: 2018 ACS 1-year estimates.

Figure II-16 shows the percent of LEP residents by Census tract in Adams County and select jurisdictions. Concentrations overlap with foreign born residents.

Figure II-16.
Percent Limited English Proficiency (LEP) by Census Tract, Jurisdictions
and Adams County, 2018



Note: Breaks represent 50%, 100%, and 150% of the county wide proportion of LEP residents (11.4%)

Source: 2018 ACS 5 year estimates and Root Policy Research.

Income and Poverty

In Adams County, the median household income has increased by more than 20 percent between 2010 and 2018. The jurisdictions within the county with the largest income growth are Federal Heights and Northglenn; yet despite these increases, these cities have income levels below the county median. Other than Bennett, Brighton, Westminister, and Thornton had the lowest growth in median income between 2010 and 2018 and remain the highest income cities.

**Figure II-17.
Median Household
Income, 2010 and 2018**

Note: Income data for Bennett show a contraction of income since 2018; however, its population is small, and the margin of error is too large to make accurate assessments on income trends from these data.

Source:
2010 and 2018 ACS 5-year estimates.

| | 2010 | 2018 | Percent Change |
|-----------------|----------|----------|----------------|
| Bennett | \$60,523 | \$54,701 | -9.6% |
| Brighton | \$65,788 | \$72,185 | 9.7% |
| Federal Heights | \$32,197 | \$40,205 | 24.9% |
| Northglenn | \$52,093 | \$66,972 | 28.6% |
| Thornton | \$65,578 | \$76,236 | 16.3% |
| Westminster | \$61,936 | \$73,629 | 18.9% |
| Adams County | \$54,666 | \$67,575 | 23.6% |

In 2018, the proportion of Adams County residents living below the poverty level was 12 percent, a decrease of 2 percentage points from 2010. The decrease in countywide poverty is consistent with the regional and national recovery from the Great Recession. Federal Heights has the highest poverty rate of all cities, almost twice as high as the county's (22%). Bennett, Brighton, and Federal Heights have experienced an increase in poverty rates since 2010, while the rest of the jurisdictions have experienced slight decreases.

**Figure II-18.
Poverty Rates and
Change, 2010 and 2018**

Source:
2010 and 2018 ACS 5-year estimates.

| | 2010 | 2018 | Percentage Point Change | Variance from County |
|-----------------|------|------|-------------------------|----------------------|
| Bennett | 4% | 12% | 8% | 0.0% |
| Brighton | 10% | 11% | 2% | -0.3% |
| Federal Heights | 19% | 22% | 3% | 10.2% |
| Northglenn | 12% | 11% | -2% | -0.7% |
| Thornton | 10% | 9% | -1% | -2.6% |
| Westminster | 10% | 8% | -2% | -3.6% |
| Adams County | 14% | 12% | -2% | |

In every community, there are residents who, for a variety of reasons (debilitating diseases, some people with disabilities, and people who are elderly with infirmities) cannot generate household income through employment, are not capable of being gainfully employed. These residents generally require long-term public assistance. Income assistance—in the form of Old Age Pension (OAP), Aid to Needy Disabled (AND), Supplemental Security Income (SSI), Social Security Disability Income (SSDI), Veterans Affairs (VA) benefits, Medicare or Medicaid, food stamps, and a “preference” for existing public housing and Section 8 vouchers—are the most realistic strategies for maintaining household income and limiting the effects of extreme poverty in these situations.

This reality—for gainfully employed residents, too—has become more transparent under the COVID-19 pandemic.

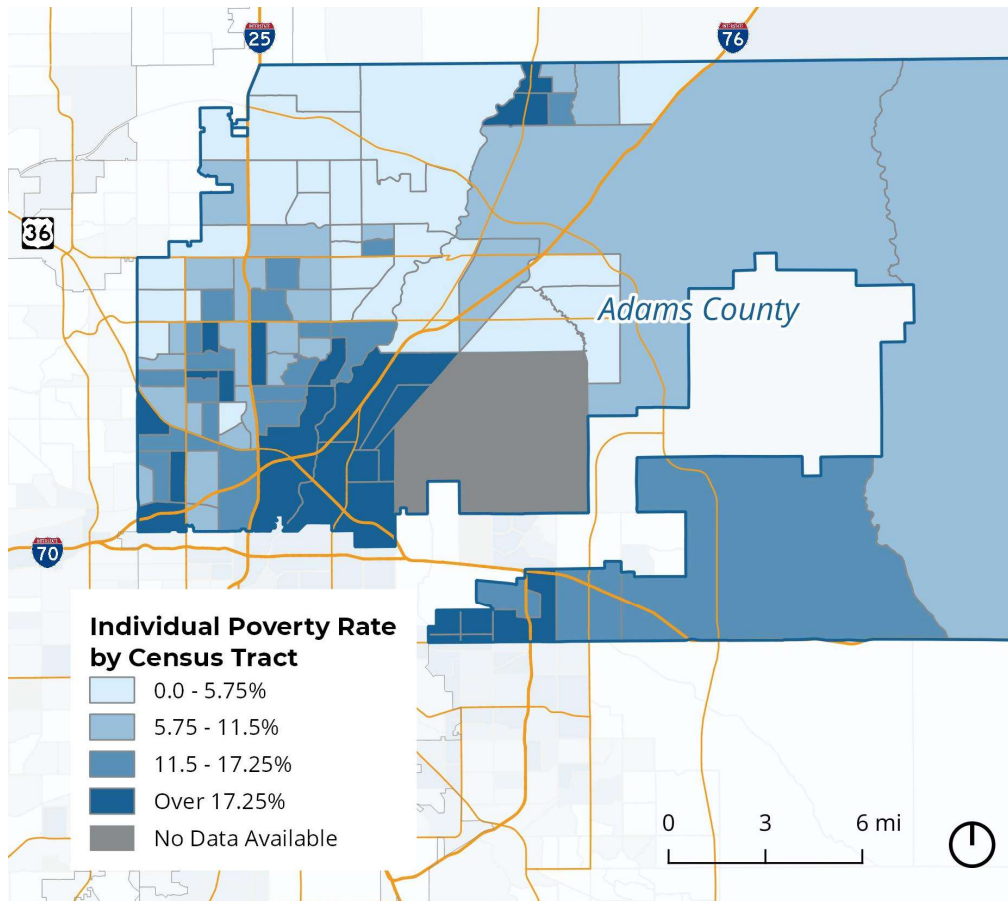
It is also important to draw a distinction between generational poverty (a child raised in poverty) and situational poverty (poverty related to job losses, significant illness, etc.). Generational poverty is usually defined as poverty lasting two generations or longer.

Residents who lost their jobs due to COVID-19 face situational poverty, as do those who cannot work for the reasons discussed above.

These very different circumstances require different approaches. For situational poverty, the solution is usually found in a temporary safety net (e.g., rent or mortgage assistance, shelter, childcare subsidies) and access to programs to help an individual or family regain self-sufficiency. Generational poverty, in contrast, is a more difficult situation to change. Families living in generational poverty need a broader and ongoing arrangement of supportive services.

Figure II-19 shows the percent of residents living in poverty by Census tract in Adams County and select jurisdictions. Census tracts with more than 17.5 percent of residents living in poverty are considered tracts with concentrated poverty. Poverty is most concentrated in the southwest areas of Adams County along I-70, I-25, and I-76 and west of Rocky Mountain Arsenal.

Figure II-19.
Individual Poverty Rate by Census Tract, Jurisdictions and Adams County, 2018



Note: Breaks represent 50%, 100%, and 150% of the county wide proportion of individual residents living in poverty (11.5%)

Source: 2018 ACS 5 year estimates and Root Policy Research

Figure II-20 shows the poverty rates and median household income by race and ethnicity for the county. African Americans and persons of Hispanic descent have a median income that is around 75 percent of the median income of non-Hispanic White households.

Hispanic residents have lower incomes and a higher poverty rate which explains Federal Heights disproportionate poverty rates and lower income, as 60 percent of its population is Hispanic. The higher proportion of poverty in Federal Heights can be seen in figure II-19.

Figure II-20.
Poverty and Median Income,
Adams County, 2018

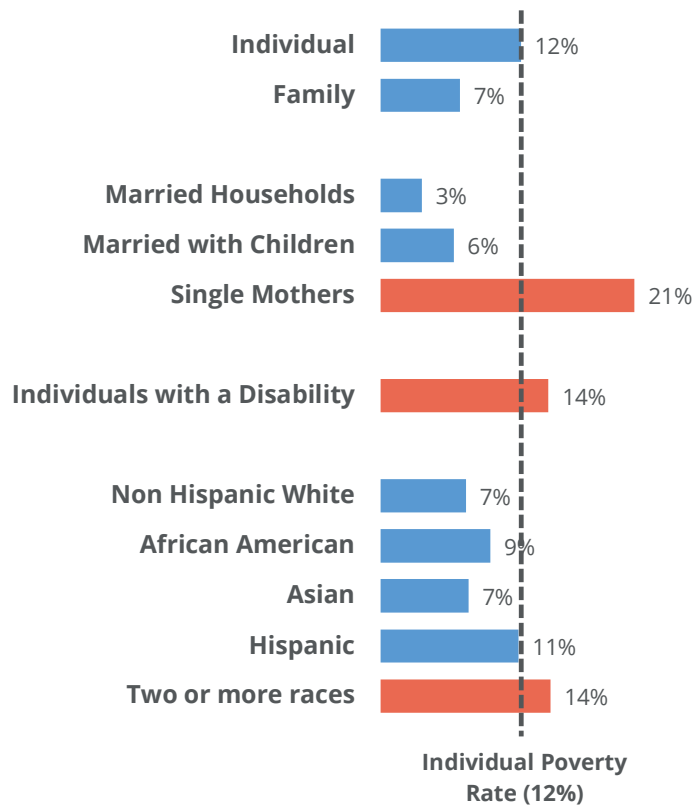
Source:
 2018 ACS 1-year estimates.

| Race/Ethnicity | Poverty Rate | Median Income |
|--------------------|--------------|---------------|
| Non Hispanic White | 7% | \$77,749 |
| African American | 9% | \$59,785 |
| Asian | 7% | \$71,869 |
| Hispanic | 11% | \$59,963 |
| Two or more races | 14% | \$76,500 |

Figure II-21 below shows the poverty rate for additional demographic groups. Demographic groups with a poverty rate that is higher than the individual poverty rate (12%) are highlighted with red. Single mothers, individuals with a disability, and residents that identify as two or more races have the highest rates of poverty in Adams County. Married households, non-Hispanic White, and Asian households have the lowest rates of poverty.

Figure II-21.
Poverty Rate by Familial
Status, Disability Status,
and Race/Ethnicity,
Adams County, 2018

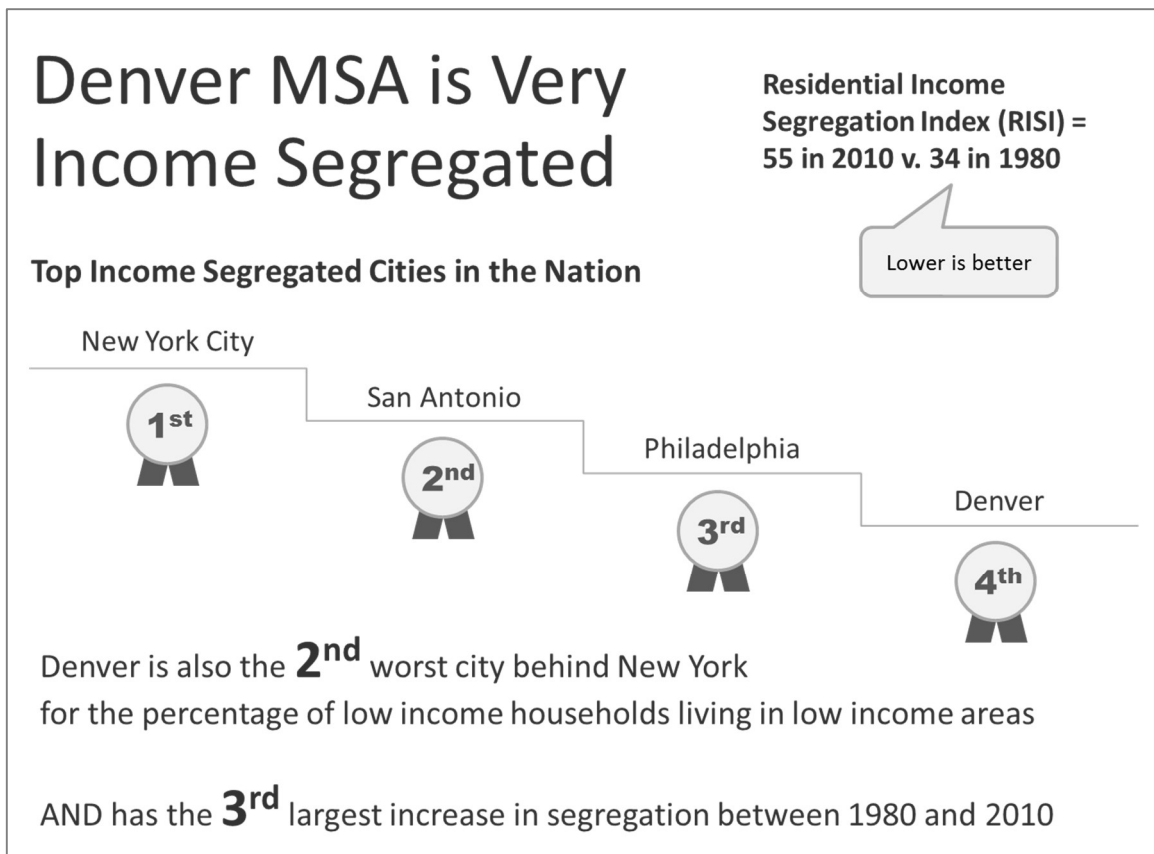
Source:
 2018 ACS 1-year estimates, Root Policy
 Research



Economic segregation. A 2013 study by the Pew Research Center, *The Rise of Residential Segregation by Income*, uses a Residential Income Segregation Index (RISI) to evaluate income segregation by metropolitan area. The index adds the share of low income residents who live in a majority low income Census tract to the share of upper income residents living in a majority upper income Census tract. Higher indices indicate higher levels of segregation.

The RISI for the Denver metropolitan statistical area (MSA) was 55 in 2010, up considerably from 34 in 1980, showing a large increase in income segregation over the past 30 years.

The report finds that the Denver MSA—in addition to New York, San Antonio and Philadelphia—lead the 30 largest metros in the share of lower income households residing in majority lower income tracts.¹⁶ The Denver MSA is just *second to New York* in the share of low income households who live in a majority low income Census tract. The Denver MSA also had the third largest increase in low income household segregation between 1980 and 2010.



In contrast, the Denver MSA ranked 10th of 30 areas for the proportion of high income households living in high income Census tracts. This suggests that the region's income segregation challenges are more significant with low income residents.

¹⁶ The Pew report uses the Census defined Denver-Aurora-Broomfield definition of MSA.

Communities with high levels of income segregation also tend to have low rates of upward mobility. Among the largest 100 metro areas, Denver ranks 40th for upward mobility of below-median income families.¹⁷

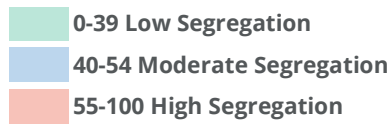
Racial and Ethnic Segregation

This section examines racial and ethnic segregation in Adams County using a variety of indices commonly used to quantify segregation and isolation of different racial and ethnic groups. Overall, the indices show low to moderate segregation in the county.

Dissimilarity index. A common measure of segregation used in fair housing studies is the dissimilarity index (DI). The DI measures the degree to which two distinct groups are evenly distributed across a geographic area, usually a county. DI values range from 0 to 100—where 0 is perfect integration and 100 is complete segregation. The DI represents the percentage of a group’s population that would have to move for each area in the county to have the same percentage of that group as the county overall.

A “score” between 0 and 39 indicates low segregation, values between 40 and 54 indicate moderate segregation, and values between 55 and 100 indicate high levels of segregation.

Figure II-22.
Dissimilarity Index,
2010 and 2018



Source:
ACS 2010 and 2018 5-year
estimates and Root Policy
Research.

| Comparison Groups | Adams County | |
|-------------------------------------|--------------|------|
| | 2010 | 2018 |
| African American/Non-Hispanic White | 60 | 51 |
| Asian/Non-Hispanic White | 37 | 33 |
| Hispanic/Non-Hispanic White | 34 | 35 |
| Minority/Non-Hispanic White | 32 | 33 |

As shown in Figure II-22, Asian, Hispanic, and non-White residents overall are more evenly distributed (low segregation) than African Americans (moderate segregation). According to the resident survey conducted to support this study, African Americans face disproportionate housing needs and challenges compared to other racial and ethnic groups in Adams County. The DI has trended down since 2010 for African Americans, and Asians and has slightly increased for Hispanics and racial and ethnic minorities as a group.

It is important to note that the DI uses non-Hispanic White residents as the primary comparison group. That is, all DI values compare racial and ethnic groups against the

¹⁷ <http://www.equality-of-opportunity.org/>.

distribution of non-Hispanic White residents. In most areas, this is a logical approach because non-Hispanic Whites are the majority of residents. However, this comparison is less relevant for Adams County, where non-Hispanic White residents are in the small minority.

Isolation index. Racial and ethnic minority populations are considered segregated if their distribution is arranged in a way that minimizes exposure to majority members. A basic measure of exposure is the isolation index, which measures the extent to which minority members are exposed to only one another. The Isolation Index is interpreted as the probability that a randomly drawn minority member shares an area with a member of the same minority, it ranges from 0 to 100 and higher values of isolation tend to indicate higher levels of segregation.

As shown in Figure II-23, the Isolation Index shows the non-White and Hispanic population in Adams County is generally isolated from non-Hispanic Whites. The average non-White or Hispanic resident in Adams County lives in a Census tract that is 56 percent minority, and the average Hispanic resident lives in a Census tract that is 49 percent Hispanic.

The average African American in Adams County lives in a Census tract that is 9 percent African American despite the 3 percent share countywide. The increase in the isolation index since 2010 for non-White and Hispanic residents also reflects that the share of these groups in the county has grown, while the share of the African American population has remained flat.

Figure II-23.
Isolation Index,
2010 and 2018

Source:
ACS 2010 and 2018 5-year
estimates and Root Policy
Research.

| Comparison Groups | Adams County | |
|-------------------------------------|--------------|------|
| | 2010 | 2018 |
| African American/Non-Hispanic White | 11 | 9 |
| Asian/Non-Hispanic White | 7 | 7 |
| Hispanic/Non-Hispanic White | 47 | 49 |
| Minority/Non-Hispanic White | 53 | 56 |

Delta index. Another measure of segregation is evaluated by the relative amount of physical space that non-White and Hispanic residents occupy. Such residents can be spatially concentrated if they occupy significantly less space than majority members. A common measure of concentration is the Delta Index. The Delta Index calculates the portion of minority members in areas with above average density. It can be interpreted as the proportion of a minority population that would have to move across areas in order to achieve a uniform density of minority members across all units, it ranges from 0 to 100 and higher values tend to indicate higher levels of spatial concentration.

Figure II-24 below, shows that Asians and African Americans are the most concentrated minority groups in Adams County. These minority residents live in areas with significantly

higher densities than non-Hispanic White residents. The Delta Index has trended down since 2010 for the county overall and for all minority groups.

**Figure II-24.
Delta Index,
2010 and
2018**

Source:
ACS 2010 and 2018
5-year estimates and
Root Policy Research.

| Comparison Groups | Adams County | |
|-------------------------------------|--------------|------|
| | 2010 | 2018 |
| African American/Non-Hispanic White | 61 | 53 |
| Asian/Non-Hispanic White | 58 | 54 |
| Hispanic/Non-Hispanic White | 53 | 49 |
| Minority/Non-Hispanic White | 51 | 48 |

Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

HUD has developed a framework to examine economic opportunity at the neighborhood level, with a focus on racial and ethnic minorities. That focus is related to the history racial and ethnic segregation, which, as discussed in the beginning of this section, often limited economic opportunity.

“Racially or ethnically concentrated areas of poverty,” also known as R/ECAPs, are neighborhoods in which there are both racial concentrations and high poverty rates.

HUD’s definition of an R/ECAP is:

- A Census tract that has a non-white population of 50 percent or more (majority-minority), or for non-urban areas (those outside of “core based statistical areas”), 20 percent, and
- A Census tract where the poverty rate is at least either 40 percent or three times the average tract poverty rate for the metropolitan area, whichever is lower.

For this study, the poverty threshold used was three times the county poverty rate—or 34.5 percent.

Why RECAPs matter. The 40 percent poverty threshold used in the R/ECAP definition is based on research identifying this to be the point at which an area becomes socially and economically dysfunctional. Conversely, research has shown that areas with up to 14 percent of poverty have no noticeable effect on community opportunity.¹⁸

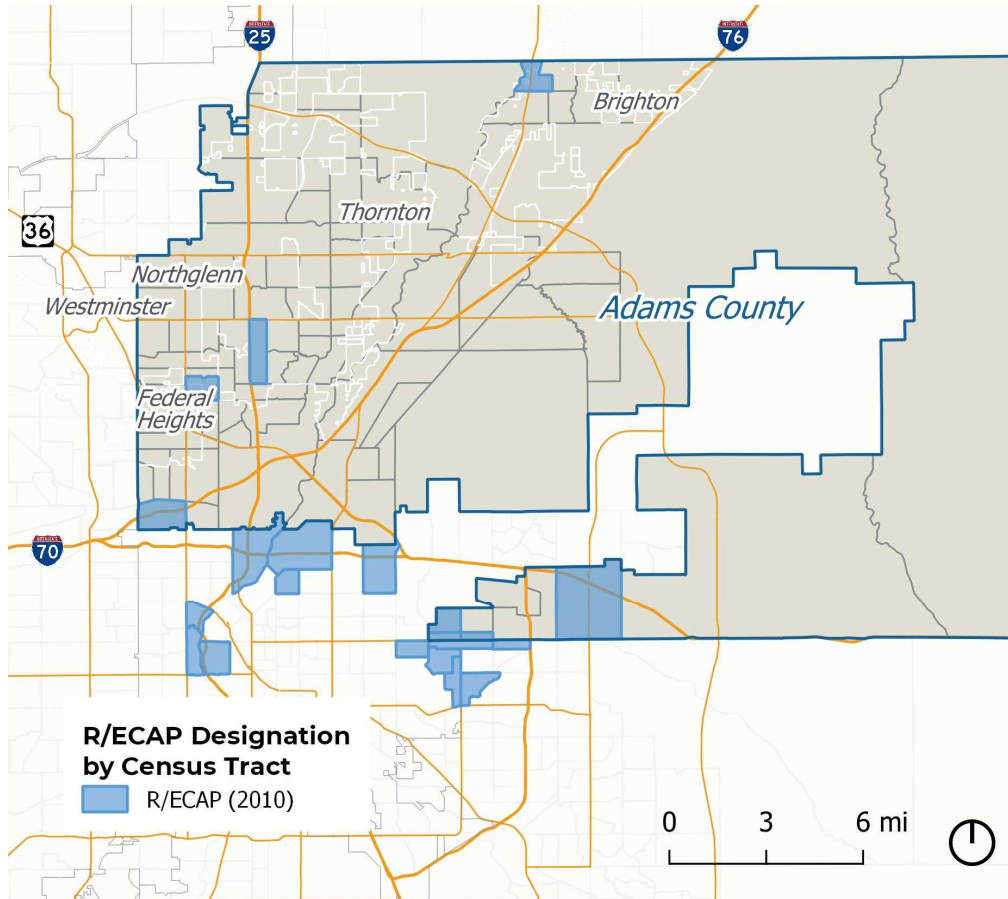
¹⁸ The Costs of Concentrated Poverty: Neighborhood Property Markets and the Dynamics of Decline.” In Nicolas P. Retsinas and Eric S. Belsky, eds., *Revisiting Rental Housing: Policies, Programs, and Priorities*. Washington, DC: Brookings Institution, 116–9.

Households within R/ECAP tracts frequently represent the most disadvantaged households within a community and often face a multitude of housing challenges. By definition, a significant number of R/ECAP households are financially burdened, which severely limits housing choice and mobility. The added possibility of racial or ethnic discrimination creates a situation where R/ECAP households are likely more susceptible to discriminatory practices in the housing market. Additionally, due to financial constraints and/or lack of knowledge (e.g., limited non-English information and materials), R/ECAP households encountering discrimination may believe they have little or no recourse, further exacerbating the situation.

It is very important to note that R/ECAPs are not areas of focus because of racial and ethnic concentrations alone. Many R/ECAPs, while not economically wealthy, are rich in culture, diversity, and community. R/ECAPs are meant to identify areas where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity.

2010 R/ECAPs. An analysis of 2010 Census data found that the Metro Denver region had 37 R/ECAPs. Of these, the majority were in Denver County followed by Adams County (7 R/ECAPs), Arapahoe County (8), and Boulder County (1). Together, these R/ECAPs represented 5 percent of Census tracts in the region. About 150,000 people lived in R/ECAP neighborhoods in 2010—or 5 percent of region’s population. Figure II-25 shows the distribution of R/ECAPs in and adjacent to Adams County as of 2010.

Figure II-25.
Racially or Ethnically Concentrated Area of Poverty (R/ECAP) by Census Tract, Jurisdictions and Adams County, 2010



Source: AFFH Raw Data

R/ECAP trends. Since 2010, the number of R/ECAPs in the metro region has dropped significantly from 37 R/ECAPs in 2010 to two R/ECAPs in 2018. Both R/ECAP designated Census tracts in 2018 were in the City and County of Denver.

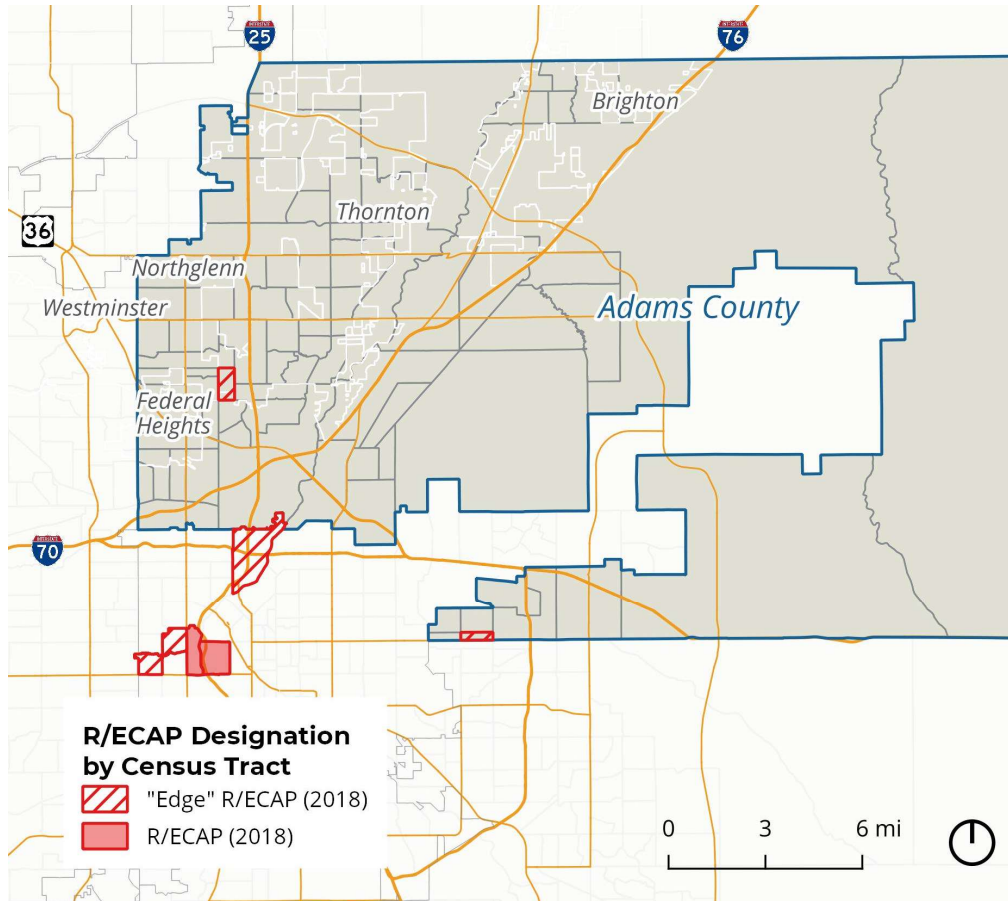
Based on the definition of R/ECAPs above, there were no R/ECAPs in Adams County 2018. This is down from seven in 2010.

Reason for the decline in R/ECAPs. The decline in R/ECAPs in Adams County was entirely due to lower poverty rates. Of the seven tracts that were R/ECAPs in 2010, all saw a significant decline in poverty between 2010 and 2018: on average, the poverty rate dropped by 18 percentage points. Some of this was due to redevelopment (e.g., Stanley Marketplace in Aurora, downtown Brighton). None of the seven tracts experienced significant declines in the minority populations—on average the minority proportion did not change. Two of the tracts saw increases in the proportion of minority residents.

Edge R/ECAPs. Some Census tracts may not meet the R/ECAP criteria, yet they are on the margin to qualifying—we call these “Edge” R/ECAPs. These are defined as Census tracts with more than 50 percent minority residents and a poverty threshold of 80 percent of the R/ECAP threshold—in this case, 27.6 percent.

As revealed in map in Figure II-26, there are six Edge R/ECAPs in the metro area, two in Adams County and four in the City and County of Denver. One of the Edge R/ECAPs in Adams County (Census Tract 39.18) is shared between Federal Heights and Thornton, east of Pecos St between W. 84th Ave. and W. Thornton Pkwy and housed 6,562 residents. This Census tract includes the Woodland Hills mobile home park on the Thornton side. The other Edge R/ECAP is in Aurora north of E. Colfax Ave between Havana St and Peoria St (Census Tract 78.02) and has 4,664 residents.

Figure II-26.
Racially or Ethnically Concentrated Area of Poverty (R/ECAP) by Census Tract, Jurisdictions and Adams County, 2018



Source: 2018 ACS 5 year estimates and Root Policy Research

Characteristic of Edge R/ECAPs. More than 11,000 total Adams County residents lived in Edge R/ECAPs in 2018. Nearly two out of three (64%) were Hispanic residents; 23 percent identified as non-Hispanic White residents; 16 percent identified as “Other” race residents; and 8.3 percent were Black residents. The overall poverty rate among Adams County residents living in Edge R/ECAPs was 34 percent compared to the countywide, individual poverty rate of 12 percent.

The Edge R/ECAP in Aurora (Census Tract 78.02) was more diverse than the other Adams County Edge R/ECAP, with 19 percent of residents identifying as Black, 31 percent identifying as an “Other” race, and 57 percent identifying as Hispanic. Among the residents of the Edge R/ECAP shared by Federal Heights and Thornton (Census Tract 39.18), 68 percent identified as Hispanic and 29 percent identified as non-Hispanic White.

SECTION IV.

ACCESS TO OPPORTUNITY

SECTION IV.

Access to Opportunity

This section examines Access to Opportunity in education, employment, and transportation—the opportunity areas identified by stakeholders and residents as being the most challenging in the jurisdictions covered in this AI. The analysis focuses on disparities in access to opportunity for persons living in poverty and protected classes. This section draws from data and maps provided by HUD, independent research conducted to support the AI, and findings from the community engagement process.

Primary Findings

Analysis in this section points to gaps in access to opportunity in:

- **Education.** Hispanic and African American students tend to have lower high school graduation rates, and lower academic achievement levels than non-Hispanic White students. In most school districts, the students with the lowest graduation rates are students who have a disability and students experiencing homelessness.
- **Employment outcomes.** Education gaps directly translate into employment gaps, particularly for the Hispanic population. Hispanics have some of the lowest shares of college graduates across jurisdictions: while the share of college graduates across the county is 22 percent, it is only 9 percent for Hispanics. The share of college graduates is higher for African Americans; however, they have the highest unemployment rate in the county.
- **Broadband access.** While 95 percent of households with income above \$75,000 have an internet subscription, 85 percent of households earning between \$20,000 and \$75,000, and only 68 percent of households earning below \$20,000 have an internet subscription.
- **Access to transportation.** While survey results indicate that generally residents are satisfied with their transportation situation, the underlying access to transit stops is limited—particularly with public transportation users.
- **Access to healthy food.** Twenty tracts in the county are identified as food deserts. One in four USDA food deserts in the county are Census tracts with a concentration (greater than 1.5 times the county proportion) of African American residents and 35 percent are Census tracts with a concentration of Hispanic residents. The average poverty rate in a food desert is 18 percent compared to 10 percent in tracts not designated as a food desert.

Initial Opportunity Indicators

To facilitate the Assess to Opportunity analysis, HUD provides “opportunity indices” that allow comparison of data indicators by race and ethnicity, for households below and above the poverty line, among jurisdictions, and across regions.

The HUD approach—specifically the following six indices in the tables—were the starting point for this Access to Opportunity analysis.

To interpret these indices, use the following rule: a higher number is always a better outcome. The indices should be thought of as an “opportunity score”, rather than a percentage.

The indices include the:

- **Low poverty index.** This index measures neighborhood exposure to poverty, with proximity to low poverty areas considered to be an advantage. Higher index scores suggest better access to economically strong (i.e. low poverty) neighborhoods.
- **School proficiency index.** This index measures neighborhood access to elementary schools with high levels of academic proficiency within 1.5 miles. Proficiency is measured by 4th grade scores on state-administered math and science tests. HUD uses elementary school scores only for this index because they are typically more reflective of school quality and access at the neighborhood level. Middle and high schools draw from larger boundaries and, especially in high school, have more transportation options.
- **Labor market engagement index.** This index measures the employability of neighborhood residents based on unemployment, labor force participation, and educational attainment. Higher index scores suggest residents are more engaged in the labor market.
- **Jobs proximity index.** The jobs proximity index indicates how close residents live to major employment centers. The higher the index, the greater the access to nearby employment centers for residents in the area.
- **Transit index.** The transit index measures use of public transit by low income families that rent. The higher the index, the more likely that residents in the area are frequent users of public transportation.
- **Low cost transportation index.** This index measures the cost of transportation, based on estimates of the transportation costs for low income families that rent. Higher index values suggest more affordable transportation.

Low poverty index. Figures IV-1a and IV-1b present the values of the low poverty index for each jurisdiction by race and ethnicity. The panel on the top shows the index for the total community population, while the panel below is restricted to residents with incomes below the poverty level. As shown, access to low poverty neighborhoods varies by

race and ethnicity in all communities. The disparity in access is most striking in the City of Thornton, where non-Hispanic White and Asian residents are around 30 percent more likely to live in low poverty neighborhoods than Hispanic households. Disparities by race and ethnicity persist and, in the case of Thornton and Westminster, widen, even when the population is limited to only those households below the poverty line. This means that, in Thornton, for example, Asian residents in poverty are more likely to live in low poverty neighborhoods than all other racial and ethnic groups.

Figure IV-1a.
Low Poverty Index, Total Population

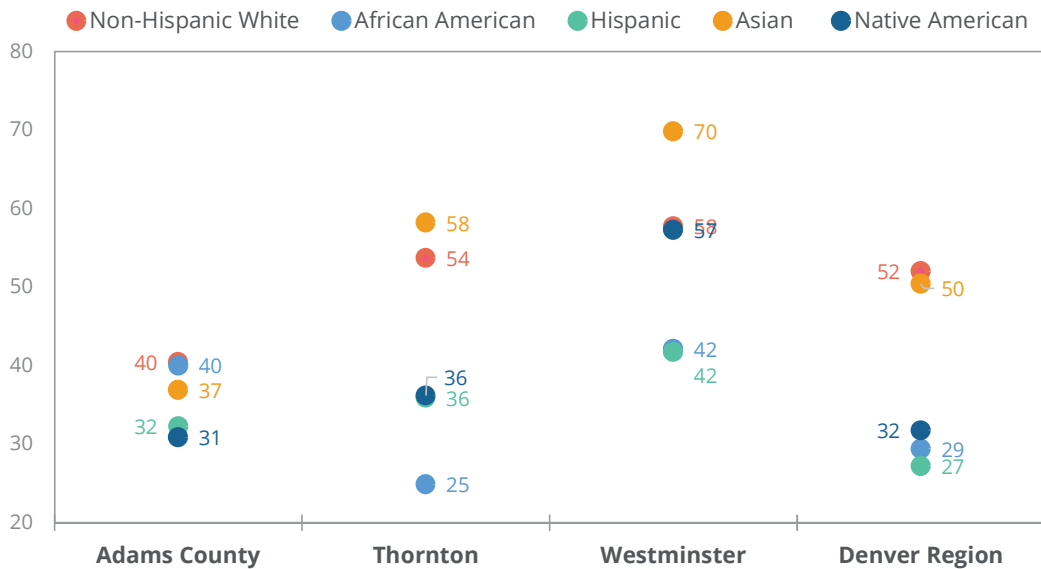


Note: Higher numbers indicate greater access to low poverty neighborhoods.

Source: Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Low Poverty Index.

Figure IV-1b.

Low Poverty Index, Population Below the Poverty Line



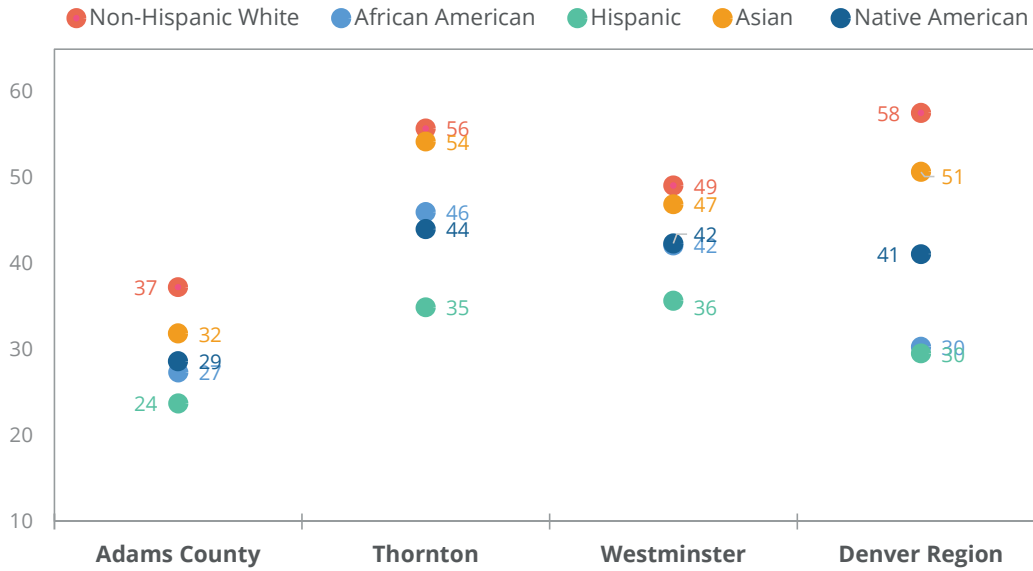
Note: Higher numbers indicate greater access to low poverty neighborhoods.

Source: Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Low Poverty Index.

School proficiency index. Figures IV-2a and IV-2b present the values of the school proficiency index for each jurisdiction by race and ethnicity. There are disparities in access to proficient schools by race and ethnicity, and the difference in access varies by community. On average, Adams County residents are somewhat less likely to have access to proficient schools, but differences by race or ethnicity are less pronounced than in the Denver region overall. Asian and non-Hispanic White students have higher access to proficient schools. African Americans living under the poverty line have higher access to proficient schools in Adams County overall than other racial/ethnic groups. In Thornton and Westminster, Asian and non-Hispanic White residents living in poverty have significantly higher access to proficient schools than Hispanics, African Americans, and Native Americans.

Figure IV-2a.

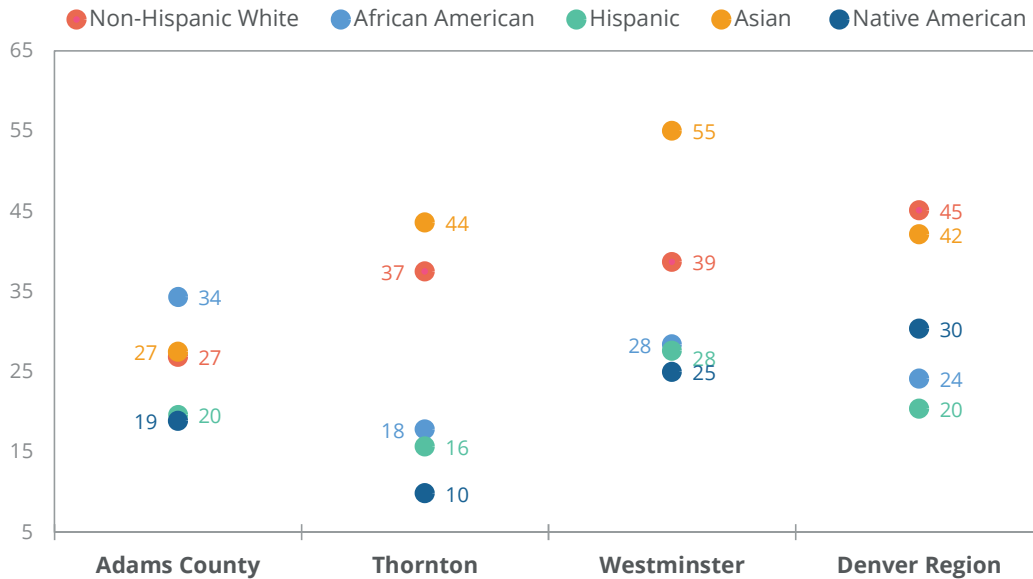
School Proficiency Index, Total Population



Note: Higher scores indicate greater likelihood of access to proficient schools.

Source: Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, School Proficiency Index.

Figure IV-2b. School Proficiency Index, Population Below the Poverty Line



Note: Higher scores indicate greater likelihood of access to proficient schools.

Source: Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, School Proficiency Index.

Labor market engagement index. Figures IV-3a and IV-3b present the values of the labor market engagement index for each jurisdiction by race and ethnicity. Adams County residents' likelihood of labor engagement is relatively low and disparities by race or ethnicity are smaller than Thornton's and Westminster's. Among the total population, Hispanics, Native Americans, and African Americans have a lower likelihood of labor market engagement. Among the population below the poverty line, the trend is similar except for African Americans under poverty who have a higher labor market engagement than non-Hispanic Whites under poverty. Although Native Americans under poverty in Westminster have the highest labor market engagement likelihood among racial and ethnic groups, their population is too small to measure meaningful differences.

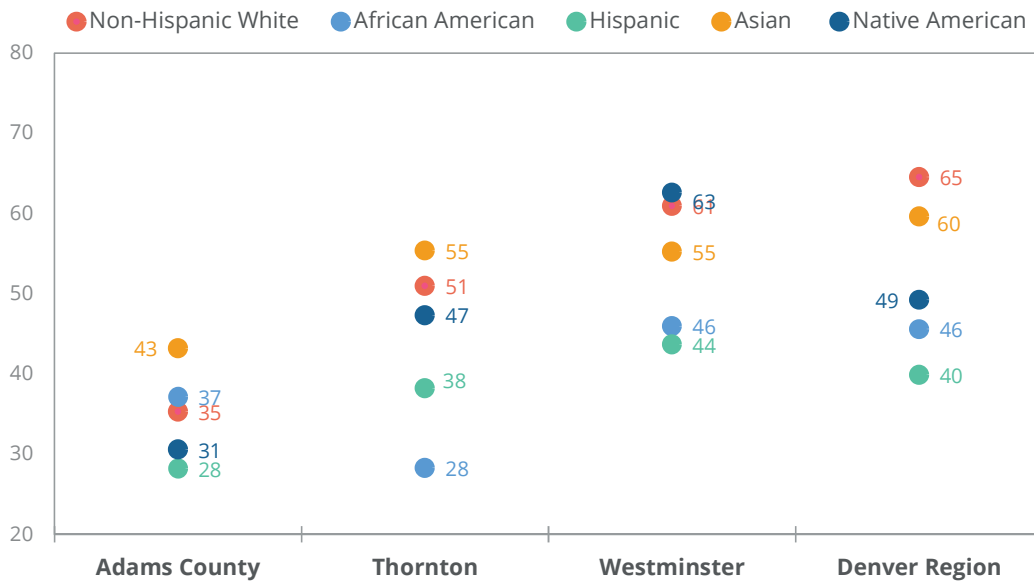
Figure IV-3a.
Labor Market Engagement Index, Total Population



Note: Higher numbers indicate higher levels of labor market engagement.

Source: Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Labor Market Engagement Index.

Figure IV-3b.
Labor Market Engagement Index, Population Below the Poverty Line



Note: Higher numbers indicate higher levels of labor market engagement.

Source: Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Labor Market Engagement Index

Job proximity index. Figures IV-4a and IV-4b present the values of the job proximity index for each jurisdiction by race and ethnicity. The odds of living near major employment centers is fairly similar for residents of Adams County, regardless of race or ethnicity. Thornton residents overall are less likely to have access to major employment centers than other residents, and the gaps in access by race and ethnicity in Thornton increase for the population below the poverty line for all but African American and Native American residents. The Denver region overall does a better job of providing equal access to jobs for people in poverty than Adams County.

Figure IV-4a.
Job Proximity Index, Total Population



Note: Higher numbers indicate better access to jobs.

Source: Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Job Proximity Index.

Figure IV-4b.
Job Proximity Index, Population Below the Poverty Line



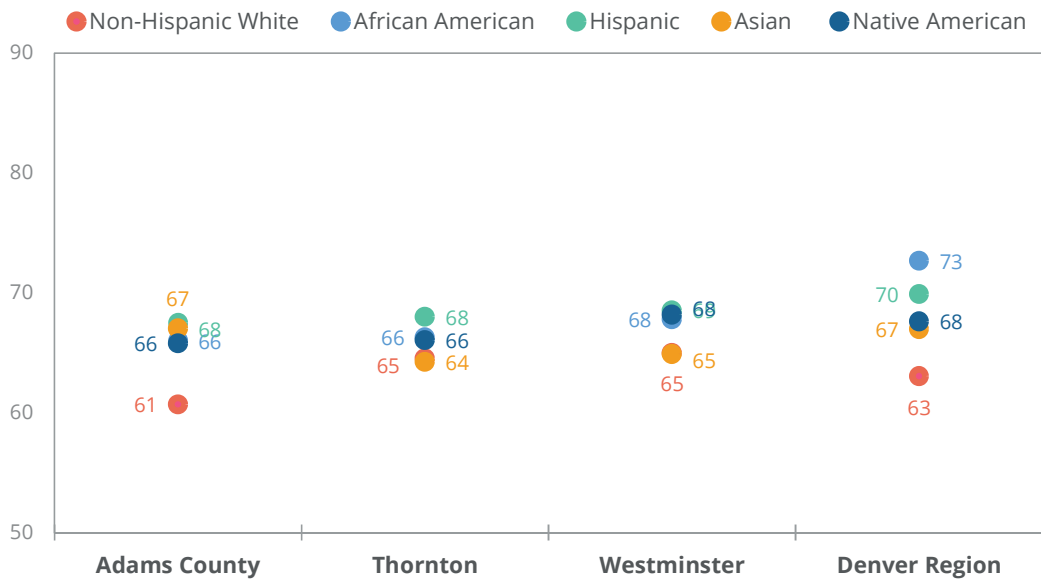
Note: Higher numbers indicate better access to jobs.

Source: Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Job Proximity Index.

Transit index. Figures IV-5a and IV-5b present the values of the transit index for each jurisdiction by race and ethnicity. The likelihood of transit use is similar across jurisdictions and there are small differences by race or ethnicity within the jurisdictions. Compared to the Denver region overall, Adams County, Thornton, and Westminster provide better equity in transit access.

When examined for residents in poverty, the transit index values increase somewhat and there are no meaningful differences by race or ethnicity in Adams County overall. African Americans in Thornton have a higher likelihood of transit use than other racial groups and other jurisdictions. Asians in Westminster have a lower likelihood of transit use than other racial groups and other jurisdictions.

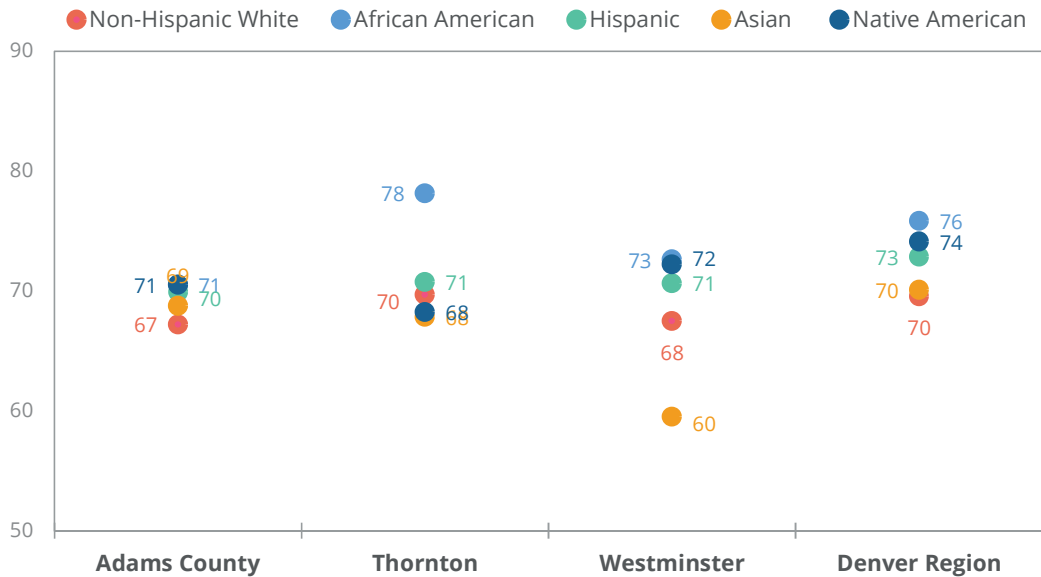
Figure IV-5a.
Transit Index, Total Population



Note: Higher numbers indicate better access to transit.

Source: Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Transit Index.

Figure IV-5b.
Transit Index, Population Below the Poverty Line



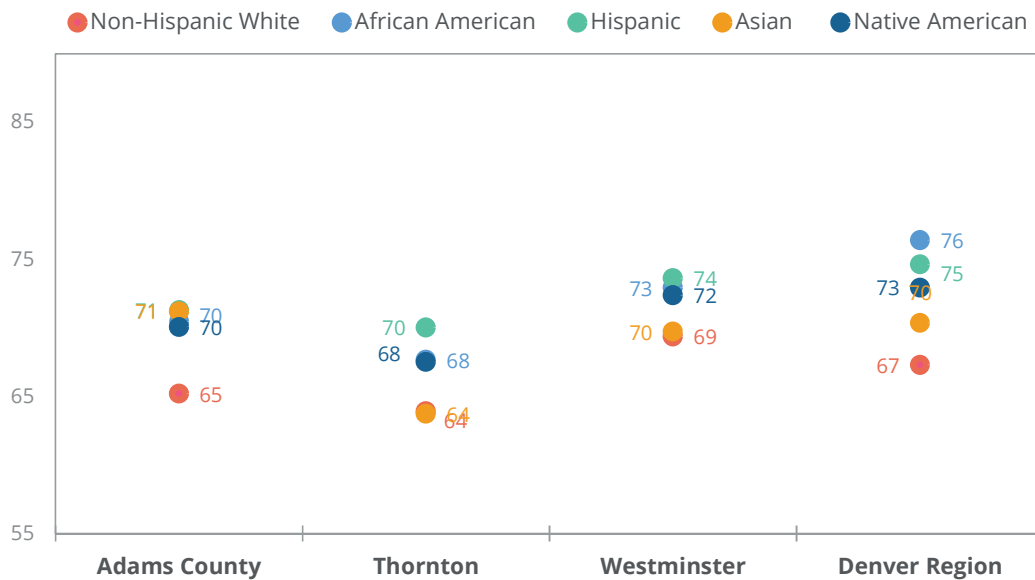
Note: Higher numbers indicate better access to transit.

Source: Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Transit Index.

Low cost transportation index. Figures IV-6a and 6b present the values of the low cost transportation index for each jurisdiction by race and ethnicity. Low cost transportation index scores for the population overall do not vary significantly by jurisdiction and there are slight differences by race or ethnicity.

When examined through the lens of poverty, scores by race and ethnicity in Adams County overall do not vary significantly. There is more variation in Thornton and Westminster. African Americans in Thornton and Westminster have a higher likelihood of accessing low cost transportation and Asians in Westminster have a significantly lower likelihood of accessing low cost transportation compared to other residents in poverty.

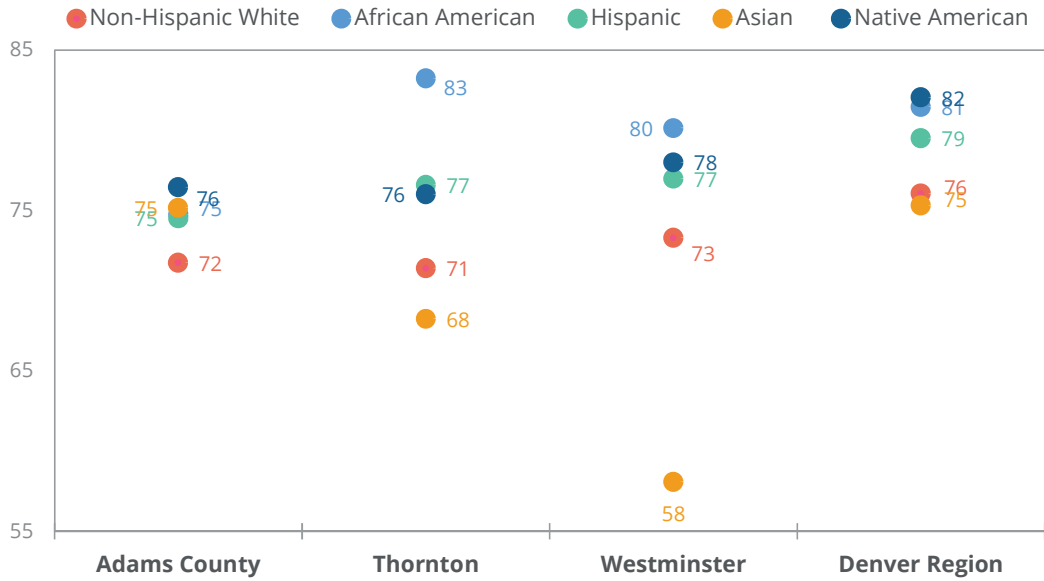
Figure IV-6a.
Low Cost Transportation Index, Total Population



Note: Higher numbers indicate access to lower cost transportation.

Source: Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Low Cost Transportation Index.

Figure IV-6b.
Low Cost Transportation Index, Population Below the Poverty Line



Note: Higher numbers indicate access to lower cost transportation.

Source: Root Policy Research from the HUD AFFH-T Table 12, Opportunity Indicators by Race and Ethnicity, Low Cost Transportation Index.

Access to Quality Education

As mentioned above, the HUD school proficiency index is based on state math and reading tests administered to 4th graders. Neighborhoods are “scored” based on proficiency ratings of up to three elementary schools with a 1.5 mile boundary; aggregate scores determine the city’s or region’s overall score. This index is used as a starting point for examining access to education.

The HUD-provided index does not fully measure school quality for a number of reasons, some of which are related to the unique educational environment in Colorado: open choice, large numbers of charter and magnet schools, and limitations on district- and publicly provided transportation.

As such, this section also incorporates recent research on school quality and the drivers of educational inequities. Colorado is fortunate to have a number of organizations that specialize in researching and advising policymakers about K-12 education. Their work and the outcomes of children attending public schools is discussed throughout this section.

Disparities in access to K-12 schools. The State of Colorado’s Public School of Choice Law¹ allows children to attend school outside of their district. This process began in the 1994-95 school year, around the time court mandated busing in Denver Public Schools (DPS) stopped. School districts have flexibility in how they implement the choice process; however, they must prioritize applicants enrolled in turnaround schools over those who are not.

In general, while open choice affords more opportunity to attend quality schools, barriers can be created by:

- Lack of open choice spots in high demand schools.
- Affordable housing near quality schools is very limited, which can lead to both travel and cultural barriers to access.
- Transportation challenges: Low income families have very few options for getting their children to quality schools due to conflicts with work schedules, bus schedules that don’t align with school schedules (and limit participation in sports and other activities), expense of transportation, and lack of public transportation discounts for low income kids.

Figure IV-7 below shows total enrollment and distribution by race and ethnicity for the twelve school districts that comprise Adams County. The largest school districts are District 12, 28J, and 27J. The districts with the largest share of Hispanic students are District 14

¹ https://www.cde.state.co.us/sites/default/files/documents/choice/download/openenrollment_2009.pdf

(86%) and Westminster (77%). The district with the largest share of African American students is District 28J (18%), and the districts with the largest share of Asian students are District 12 and 28J (5% each). Since the 2015-2016 school year, the districts overall saw a decrease in enrollment of 1,700 students (combined).

Figure IV-7.
Total Enrollment by School District and Race/Ethnicity, 2018-2019

| School District | Total Enrollment | Distribution | | | | | |
|-------------------------------|------------------|--------------|------------------|----------|--------------------|-------------------|------------|
| | | Asian | African American | Hispanic | Non-Hispanic White | Two or More Races | Other Race |
| District 1 (Mapleton) | 8,449 | 2% | 2% | 64% | 28% | 4% | 1% |
| District 12 Five Star Schools | 38,040 | 5% | 2% | 41% | 48% | 3% | 1% |
| District 14 (Commerce City) | 6,507 | 0% | 2% | 86% | 10% | 1% | 1% |
| District 26J (Deer Trail) | 184 | 1% | 0% | 28% | 67% | 3% | 1% |
| District 27J (Brighton) | 18,026 | 3% | 2% | 46% | 46% | 3% | 1% |
| District 28J (Aurora) | 36,887 | 5% | 18% | 55% | 15% | 5% | 1% |
| District 29J (Bennett) | 1,027 | 0% | 1% | 30% | 64% | 5% | 1% |
| District 31J (Strasburg) | 983 | 1% | 1% | 20% | 75% | 2% | 1% |
| District 32J (Byers) | 2,867 | 1% | 5% | 26% | 65% | 2% | 2% |
| District RE3J (Keenesburg) | 2,380 | 1% | 1% | 43% | 53% | 2% | 0% |
| District RE-50J (Wiggins) | 649 | 1% | 0% | 24% | 65% | 3% | 6% |
| Westminster Public Schools | 8,590 | 4% | 1% | 77% | 15% | 2% | 1% |

Note: K-12 Enrollment.

Source: Colorado Department of Education.

Children eligible for free and reduced lunch (FRL) is an economic indicator of risk that is used by educational departments to identify at-risk youth and target educational reform programs. Similar to the federal poverty threshold, the FRL threshold is fixed and does not vary by state or jurisdiction. Currently, children are eligible to receive free lunches if their families earn less than 130 percent of the federal poverty threshold and reduced lunch prices if earning between 130 and 185 of the poverty threshold.² This translates into income levels of roughly \$33,500 for free lunch eligibility and \$33,500 to \$47,600 for reduced lunch eligibility, both for a family of four.³

Figure IV-8 below shows the share of students who qualify for free and reduced lunch (FRL) by school district for the academic years 2015-2016 and 2018-2019:

- The districts with the highest shares of FRL students are District 14 in Commerce City (85%) and Westminster (80%), and
- Most districts have seen a reduction in the share of FRL students—the most dramatic in Byers— except for the districts in Aurora, Strasburg, and Keenesburg.

² govinfo.gov/content/pkg/FR-2019-03-20/pdf/2019-05183.pdf

³ Paul Tough, in his book “How Children Succeed,” argues that FRL is a weak measure of children in need because of the wide eligibility income range, an argument that could be applied to many definitions of low income and socioeconomic status. Children living in families earning \$10,000, for example, likely have much greater needs and potentially higher risks of academic failure than those living in households at the higher end of the threshold (\$44,000). These higher risk factors, according to Tough, include no adult in the household who is consistently employed, mental health, substance abuse in the household, and potential child abuse and neglect.

Tough further argues that children living in high poverty households also have psychological challenges, many related to poor parenting, that make the learning environment very challenging. The experience of stress and trauma as a child can lead to poor executive functioning, difficulty handling stressful situations, poor concentration, difficulty following directions, and social impairment. These children, therefore, require different interventions and reforms than those at the “middle class” end of the FRL spectrum.

Figure IV-8.
Proportion of K-12 Students Qualifying for Free and Reduced Lunch (FRL),
2015-2016 and 2018-2019

| School District | 2015-2016 | 2018-2019 | Percentage Point Change |
|-------------------------------|-----------|-----------|-------------------------|
| District 1 (Mapleton) | 62% | 58% | -4% |
| District 12 Five Star Schools | 39% | 38% | -2% |
| District 14 (Commerce City) | 85% | 85% | 0% |
| District 26J (Deer Trail) | 48% | 46% | -2% |
| District 27J (Brighton) | 36% | 35% | -2% |
| District 28J (Aurora) | 67% | 68% | 1% |
| District 29J (Bennett) | 30% | 30% | -1% |
| District 31J (Strasburg) | 23% | 27% | 4% |
| District 32J (Byers) | 42% | 29% | -13% |
| District RE3J (Keenesburg) | 26% | 35% | 9% |
| District RE-50J (Wiggins) | 46% | 38% | -8% |
| Westminster Public Schools | 83% | 80% | -3% |

Source: Colorado Department of Education.

Figure IV-9 below shows the share of students who are English language learners (ELL) by school district for the academic years 2015-2016 and 2018-2019.

- The districts with the highest shares are District 14 in Commerce City (56%), Aurora (47%), and Westminster (43%).
- Most districts have seen a reduction in the share of ELL students, except for districts in Deer Trail, Bennett, and Strasburg.

Figure IV-9.
Proportion of K-12 English Language Learners (ELL), 2015-2016 and 2018-2019

| School District | 2015-2016 | 2018-2019 | Percentage Point Change |
|-------------------------------|-----------|-----------|-------------------------|
| District 1 (Mapleton) | 35% | 33% | -2% |
| District 12 Five Star Schools | 24% | 22% | -2% |
| District 14 (Commerce City) | 58% | 56% | -2% |
| District 26J (Deer Trail) | 11% | 16% | 6% |
| District 27J (Brighton) | 18% | 16% | -2% |
| District 28J (Aurora) | 51% | 47% | -3% |
| District 29J (Bennett) | 11% | 14% | 3% |
| District 31J (Strasburg) | 5% | 8% | 3% |
| District 32J (Byers) | 28% | 13% | -15% |
| District RE3J (Keenesburg) | 50% | 20% | -29% |
| District RE-50J (Wiggins) | 19% | 13% | -6% |
| Westminster Public Schools | 50% | 43% | -7% |

Source: Colorado Department of Education.

Educational gaps. Providing access to high quality schools—as well as programming within schools to prepare students for moderate- and high-paying jobs—are key aspects of improving education outcomes of low income children.

Figure IV-10 below shows the four-year high school graduation rate for school districts with more than a total of 1,000 enrolled students in the academic year. Disparities in graduation rates are apparent across school districts, as well as within. District 29J in Bennett has the highest graduation rate of 88 percent while District 32J in Byers has the lowest at 59 percent.

Overall, although Hispanic student graduation rates are lower than non-Hispanic White rates, the differences are modest. This is less true for African American students.

Notable differences among children of different races and ethnicities include:

- The graduation rate in Commerce City is very low for African American students at just 36 percent;
- Graduation rates in Byers are relatively low;
- Graduation rates among student race and ethnicity in Aurora and Brighton are more equal than in other districts;

- Graduation rates for students with Free and Reduced Lunch are not significantly lower than for students overall—a unique and very positive outcome; and
- African American and Hispanic student graduation rates in Westminster are higher than that of non-Hispanic White students.

In most school districts, the students with the lowest graduation rates are students who have a disability and students experiencing homelessness.

Figure IV-10.
High School Graduation Rates by School District, Race/Ethnicity and Demographics, 2018-2019

| School District | All | Race/Ethnicity | | | | | Demographic Characteristics | | | |
|--------------------------------------|-----|----------------|------------------|----------|--------------------|-------------------|-----------------------------|-----|-----|----------|
| | | Asian | African American | Hispanic | Non-Hispanic White | Two or More Races | Disability | LEP | FRL | Homeless |
| District 1 (Mapleton) | 69% | 82% | 54% | 73% | 64% | 66% | 59% | 70% | 68% | 65% |
| District 12 Five Star Schools | 83% | 89% | 79% | 76% | 90% | 82% | 61% | 69% | 73% | 64% |
| District 14 (Commerce City) | 63% | - | 36% | 63% | 65% | 83% | 37% | 58% | 64% | 35% |
| District 27J (Brighton) | 84% | 90% | 82% | 81% | 86% | 97% | 59% | 73% | 78% | 60% |
| District 28J (Aurora) | 76% | 84% | 74% | 76% | 77% | 73% | 54% | 71% | 74% | 58% |
| District 29J (Bennett) | 88% | - | - | 81% | 92% | 100% | 75% | 90% | 80% | 100% |
| District 32J (Byers) | 59% | 50% | 40% | 56% | 61% | 50% | 31% | 63% | 57% | 43% |
| District RE3J (Keenesburg) | 81% | - | - | 73% | 86% | 80% | 90% | 58% | 77% | 75% |
| Westminster Public Schools | 69% | 95% | 67% | 70% | 59% | 55% | 32% | 73% | 67% | 66% |

Note: Four-year graduation rates, figures missing where enrollment is too small.

Source: Colorado Department of Education.

Figure IV-11 below shows significant disparities in discipline rates⁴ among students from different race/ethnicities. In the overwhelming majority of districts African American, Hispanic, and multi-racial students have higher discipline rates than non-Hispanic White students, with discipline rates for African American students being much higher.

Notable differences among children of different races and ethnicities include:

- The discipline rates in Commerce City and Westminster is very high for African American and students of two or more races;
- Discipline rates for Asian students are low across all districts;
- Discipline rates among students in District 1 are more equal than in other districts;
- Hispanic student discipline rates in Commerce City are lower than that of non-Hispanic White students.

Figure IV-11.
Discipline Rates by School District and Race and Ethnicity, 2018-2019

| School District | All | Race/Ethnicity | | | | |
|-------------------------------|-----|----------------|------------------|----------|--------------------|-------------------|
| | | Asian | African American | Hispanic | Non-Hispanic White | Two or More Races |
| District 1 (Mapleton) | 8% | 6% | 8% | 9% | 5% | 8% |
| District 12 Five Star Schools | 10% | 3% | 20% | 13% | 8% | 7% |
| District 14 (Commerce City) | 14% | - | 31% | 12% | 20% | 29% |
| District 27J (Brighton) | 14% | 7% | 21% | 16% | 12% | 20% |
| District 28J (Aurora) | 10% | 5% | 16% | 9% | 9% | 11% |
| District 29J (Bennett) | 9% | - | 27% | 9% | 9% | 13% |
| District 32J (Byers) | 2% | 0% | 1% | 4% | 2% | 6% |
| District RE3J (Keenesburg) | 10% | 7% | 21% | 12% | 9% | 6% |
| Westminster Public Schools | 14% | 2% | 32% | 13% | 17% | 26% |

Note: Figures missing where enrollment is too small.

Source: Colorado Department of Education and Root Policy Research.

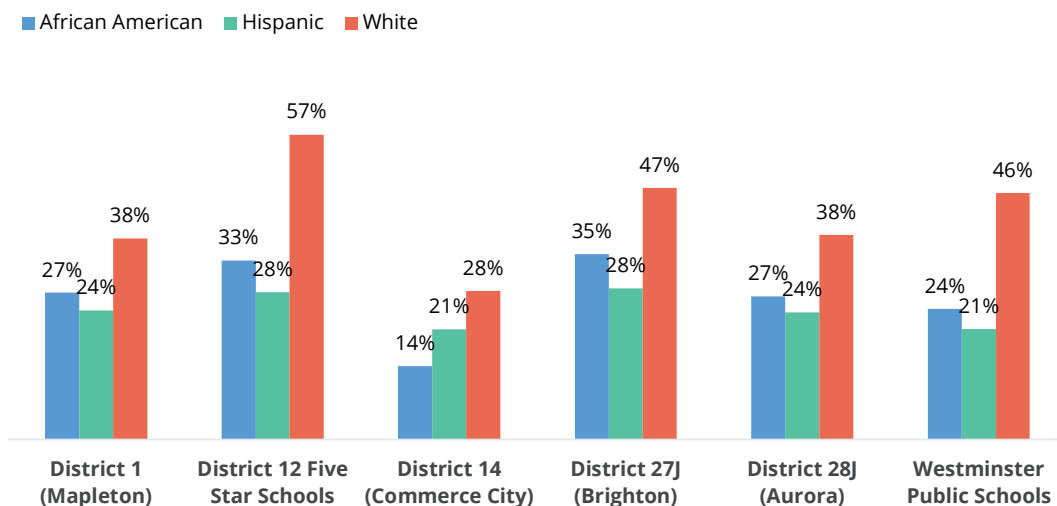
⁴ Discipline rates were calculated using the unduplicated count of students disciplined during the 2018-2019 school calendar year. Forms of discipline include suspension, expulsion, referral to law enforcement, and school related arrest.

According to the Colorado Department of Education (CDE), the State of Colorado has some of the most educated residents in the country—and the highest gap in academic attainment between majority (White, non-Hispanic) and minority (non-White and Hispanic) students. Colorado also has one of the lowest college matriculation rates, especially for minority students. In essence, the state must import its most educated residents because it fails to produce them.

Figures IV-12 and IV-13 below show the percent of students in each school district who met or exceeded CMAS score expectations for English and math. It is important to note that all school districts have proficiency gaps among non-Hispanic White students and students of color.

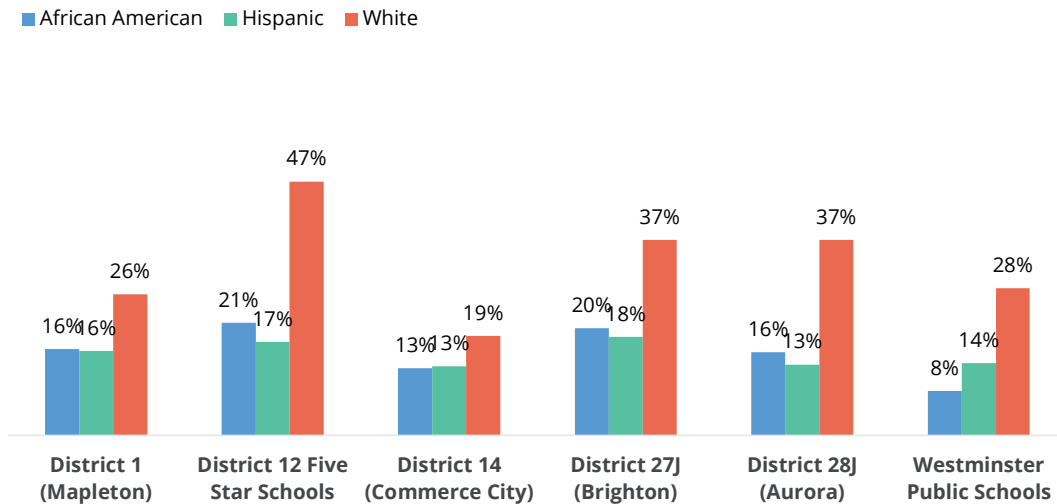
- Academic achievement gaps are particularly salient in District 12 and Westminster Public Schools;
- Commerce City has the smallest achievement gaps; but this is due to the underperformance of White students compared to other districts;
- African American students have higher achievement rates in English than Hispanic students in all districts except Commerce City;
- Achievement rates in math are very similar among African American and Hispanic students.

Figure IV-12.
Academic Gap, All Grades, English, 2019



Source: Colorado Department of Education.

Figure IV-13.
Academic Gap, All Grades, Math, 2019



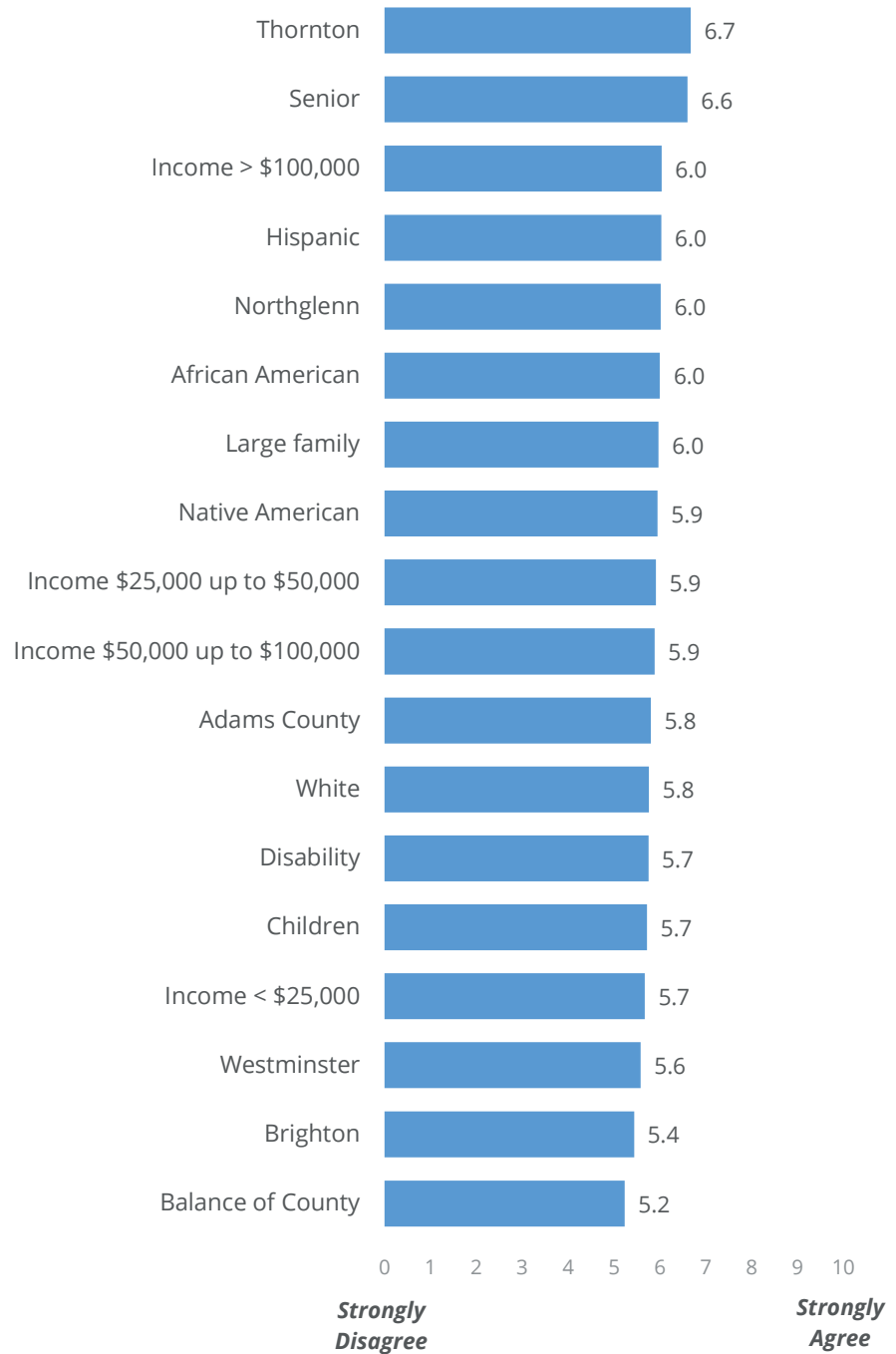
Source: Colorado Department of Education.

School quality perceptions. According to results from the resident survey, in general, Adams County respondents somewhat agree that neighborhood children go to a good quality public school.

- Among jurisdictions, Thornton residents are most likely to agree that neighborhood children attend quality public schools. While the differences are modest, Brighton and Balance of County residents are less likely than respondents from other jurisdictions to agree that neighborhood children go to quality public schools.
- Regardless of income or housing tenure, respondents have almost the same perspective on the quality of neighborhood schools and the convenience of job locations.
- With the exception of seniors, members of protected classes somewhat agree that neighborhood children go to quality public schools. Native American, African American, and households that include a member with a disability are slightly less likely than others to agree that job locations are convenient. African American respondents are somewhat less likely to agree that they can easily get the places they need to go using their preferred mode of transportation. On each economic opportunity indicator, seniors gave the highest average ratings.

**Figure IV-13.
Children in my
neighborhood
go to a good
quality public
school, on a
scale from 1 to
10, where 1 is
“Strongly
Disagree” and 10
is “Strongly
Agree.”**

Source:
Root Policy Research from
the 2020 Adams County
Housing and Community
Needs Resident Survey.



Access to Employment

Before the current COVID-19 crisis, employment was expanding in Adams County. Figure IV-14 shows the change in jobs by employment sector between 2010 and 2019. The sectors with the highest percent growth since 2010 are education and health services, construction, and leisure and hospitality.

Figure IV-15 shows average weekly wages by sector and changes since 2010. The strongest growth occurred in the education and health services, leisure and hospitality, and financial services sectors. The leisure and hospitality industry— the industry most severely impacted by the COVID-19 crisis—has by far the lowest wages, while the manufacturing sector experienced the lowest wage growth since 2010.

The sectors that employ the most people in the county are trade, and education and health services. The disparity in average wages between high and low paying sectors has increased since 2010.

**Figure IV-14.
Number of
Employees by
Sector, 2010-2019**

Note:
2019 numbers are preliminary.

Source:
Bureau of Labor Statistics.

| Sector | 2010 | 2019 | Percent change |
|-------------------------------|--------|--------|----------------|
| Manufacturing | 10,739 | 14,356 | 34% |
| Trade | 44,214 | 61,196 | 38% |
| Information | 1,992 | 2,564 | 29% |
| Financial Services | 5,270 | 6,928 | 31% |
| Education and Health Services | 29,380 | 54,510 | 86% |
| Leisure and Hospitality | 12,944 | 20,187 | 56% |
| Public Administration | 6,559 | 8,649 | 32% |
| Construction | 13,578 | 23,637 | 74% |
| Other Services | 4,459 | 6,177 | 39% |

**Figure IV-15.
Average Weekly
Wages by Sector,
2010-2019**

Note:
2019 numbers are preliminary.

Source:
Bureau of Labor Statistics.

| Sector | 2010 | 2019 | Percent change |
|-------------------------------|---------|---------|----------------|
| Manufacturing | \$1,105 | \$1,152 | 4% |
| Trade | \$810 | \$979 | 21% |
| Information | \$1,292 | \$1,715 | 33% |
| Financial Services | \$740 | \$1,099 | 48% |
| Education and Health Services | \$817 | \$1,309 | 60% |
| Leisure and Hospitality | \$309 | \$462 | 50% |
| Public Administration | \$1,024 | \$1,280 | 25% |
| Construction | \$895 | \$1,277 | 43% |
| Other Services | \$670 | \$856 | 28% |

Despite the growth in employment and wages, data on educational attainment, shown in Figure IV-16 below, suggest that White and Asian workers—who have the highest rates of college graduation—are more likely to benefit from economic growth while Hispanic and African American workers will suffer more from economic declines.

- Among jurisdictions, Westminster has the highest share of the population 25 years and over with a college degree (37%); three times higher than that of Federal Heights (12%);
- Among race/ethnicity, Hispanics make up the lowest share of the population with a college degree in all jurisdictions except Federal Heights and Brighton. This disparity is

large. Hispanics are around half as likely to have a college degree than the overall population.

- African Americans have similar shares of college graduates compared to the overall population in the County as well as in Thornton and Westminster, and a higher share in Federal Heights.

Educational gaps directly transfer into income gaps. According to ACS data, a worker in Adams County without a bachelor’s degree earns approximately two thirds of what a worker with a bachelor’s degree earns and a worker without a high school degree earns around half of what a worker with a bachelor’s degree earns.

Figure IV-16.
Share of Population with a College Degree, by Race, Ethnicity and Jurisdiction, 2018

| | All | Race/Ethnicity | | | | |
|------------------------|-----|----------------|------------------|----------|--------------------|-------------------|
| | | Asian | African American | Hispanic | Non-Hispanic White | Two or More Races |
| Brighton | 21% | 51% | 6% | 8% | 27% | 16% |
| Federal Heights | 12% | - | 19% | 6% | 19% | 4% |
| Northglenn | 21% | 37% | 10% | 9% | 25% | 28% |
| Thornton | 28% | 41% | 29% | 11% | 35% | 33% |
| Westminster | 37% | 35% | 37% | 15% | 43% | 28% |
| Adams County | 24% | 33% | 22% | 9% | 31% | 21% |

Note: Share of population 25 years and over.

Source: 2018 ACS 5-year estimates.

Figure IV-17 below shows the distribution of Adams County’s workforce by commuting status. The workforce is comprised of all workers who live and/or work in Adams County. The largest proportion of Adams County’s workforce is comprised of outcommuters (44%) and only 18 percent of the workforce lives and works in the county. This distribution has remained stable since 2010.

The number one destination for outcommuters is Denver. Most of the jurisdictions in the county also have a large share of outcommuters, with the biggest in Thornton (71%), followed by Federal Heights (64%).

**Figure IV-17.
Workforce
Commuting
Patterns, Adams
County**

Note:

Workforce is comprised of all workers who live and/or work in Adams County

Source:

Longitudinal Employer-Household Dynamics (LEHD).

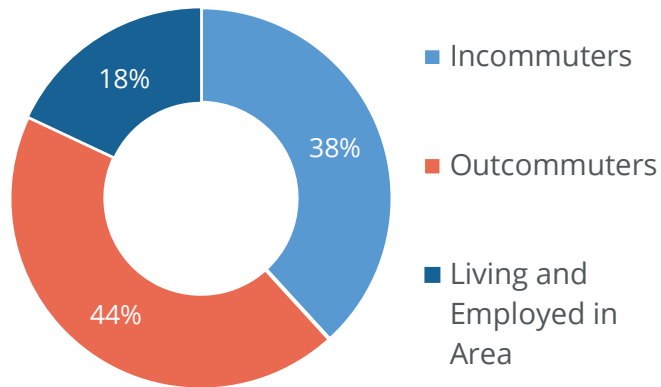


Figure IV-18 below shows the unemployment rate by race and ethnicity in Adams County. Although unemployment rates have significantly increased since the onset of the COVID-19 crisis, disparities in unemployment rates were trending down during the economic recovery. African American, Hispanic, and multi-racial residents experienced significant reductions in unemployment rates between 2010 and 2018. Unfortunately, these gains are being eroded during the pandemic.

**Figure IV-18.
Unemployment
rate, by race and
Ethnicity, Adams
County**

Source:

2010 and 2018 ACS 5-year estimates.

| Race/Ethnicity | 2010 | 2018 | Percentage point change |
|--------------------|-------|------|-------------------------|
| Asian | 6.2% | 5.0% | -1% |
| African American | 13.0% | 6.9% | -6% |
| Hispanic | 9.3% | 4.3% | -5% |
| Non-Hispanic White | 6.9% | 4.2% | -3% |
| Two or More Races | 10.8% | 5.0% | -6% |

According to employment data from the Bureau of Labor Statistics (BLS), the unemployment rate for Colorado was 10 percent in May and 11 percent in Adams County with around 29,000 unemployed workers. The unemployment rate was 10 percent in Thornton (7,900 workers unemployed) and 11 percent in Westminster (7,200 workers unemployed.)

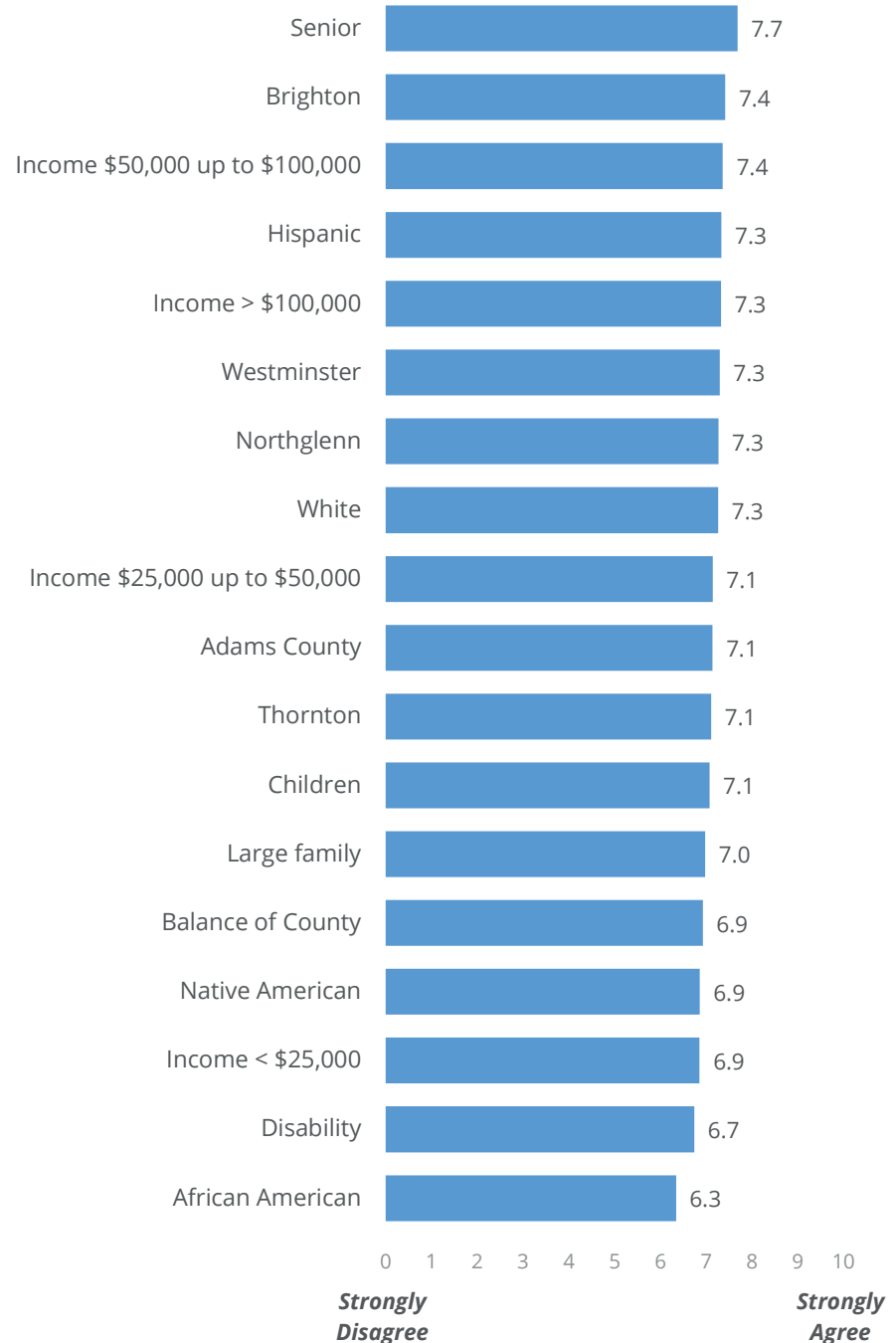
Location of job opportunities. According to results from the resident survey Adams County respondents somewhat agree that the location of job opportunities is convenient to where they live.

- Among jurisdictions, Westminster and Thornton residents are most likely to agree that that job locations are convenient. While the differences are modest, Brighton and Balance of County residents are less likely than respondents from other jurisdictions to agree that job locations are convenient.

- Among members of protected classes Native American, African American, and households that include a member with a disability are slightly less likely than others to agree that job locations are convenient.

Figure IV-19.
Children in my neighborhood go to a good quality public school, on a scale from 1 to 10, where 1 is “Strongly Disagree” and 10 is “Strongly Agree.”

Source:
 Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.



Broadband access. Access to broadband has increasingly become a necessity versus a luxury. Yet, according to the Federal Communications Commission (FCC), in 2017, 34 million Americans still lack broadband Internet access (defined as a minimum of a 25 Mbps connection). People who lack access are increasingly unable to take advantage of economic and educational opportunities as those who do have access.

According to 2017 ACS data, in Adams County, more than 10,000 residents do not own a computer, 23,399 (14%) residents do not have an Internet subscription, and another 16,075 (10%) rely on a cellular data plan to access the Internet. While 95 percent of households with income above \$75,000 have an internet subscription, 85 percent of households with income between \$20,000 and \$75,000, and only 68 percent of households with income below \$20,000 have an internet subscription.

Transportation Access

The Center for Neighborhood Technology's (CNT's) AllTransit™ information system provides an analysis of transit gaps, identifying areas that are underserved by transit but that have a sufficient market to support transit.⁵ Figure IV-20 shows the AllTransit™ gaps in Adams County. Not all areas have sufficient population to support transit service, thus a lack of transit does not necessarily mean that an area has a gap. AllTransit's™ methodology to identify gaps in transit service is based on areas with a market (demand) for transit and compares that demand to service availability.

AllTransit™ identifies gaps as neighborhoods (Census block groups) with a mismatch between the transit market and available transit service. The transit market is a function of demographics, employment, commerce, urban form. The available transit service is based on AllTransit's™ Performance Index (API), which measures connectivity, job access, and level of service. The comparison of the transit market to services functions as an indicator of neighborhoods underserved by transit.⁶

- Areas shaded in blue on the map identify block groups where the transit service provided is comparable to transit service in similar markets, an indicator that the service is adequate—neither the best nor the worst. This represents the majority of areas in the populated areas of the County.
- Areas shaded in orange or red are gaps in transit, where the available transit is not adequate to meet demand. **Orange areas indicate neighborhoods with medium**

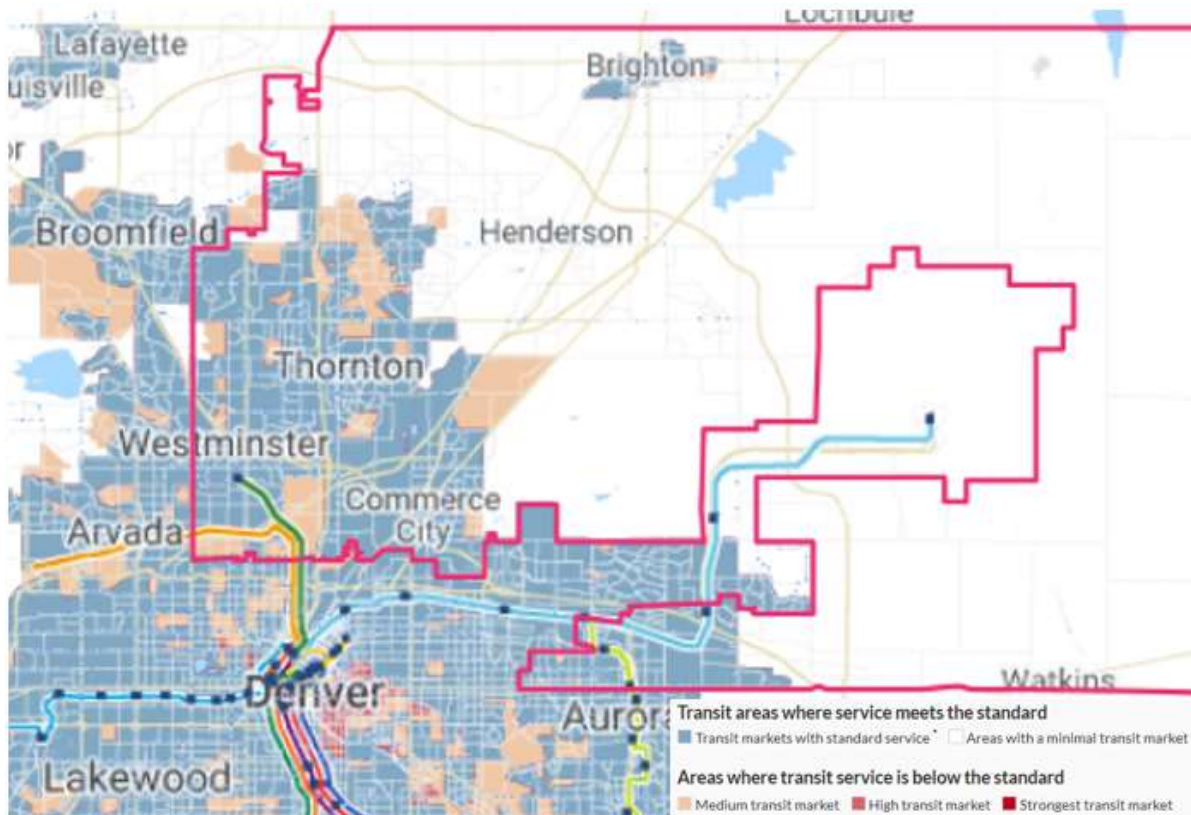
⁵ <https://alltransit.cnt.org/gap-finder/>

⁶ AllTransit's™ measure of transit demand is a function of demographics, employment, commerce, and urban form.: <https://alltransit.cnt.org/methods/gap-methods-v1.pdf>

transit markets with inadequate transit service. These areas are north and east of Thornton, and in the southwest portion of Westminster.

- Areas without shading do not have sufficient transit market strength—are places with minimal transit markets—such that “adding transit would not represent an improvement.” This includes the majority of Adams County.

Figure IV-20.
AllTransit™ Transit Gaps in Adams County



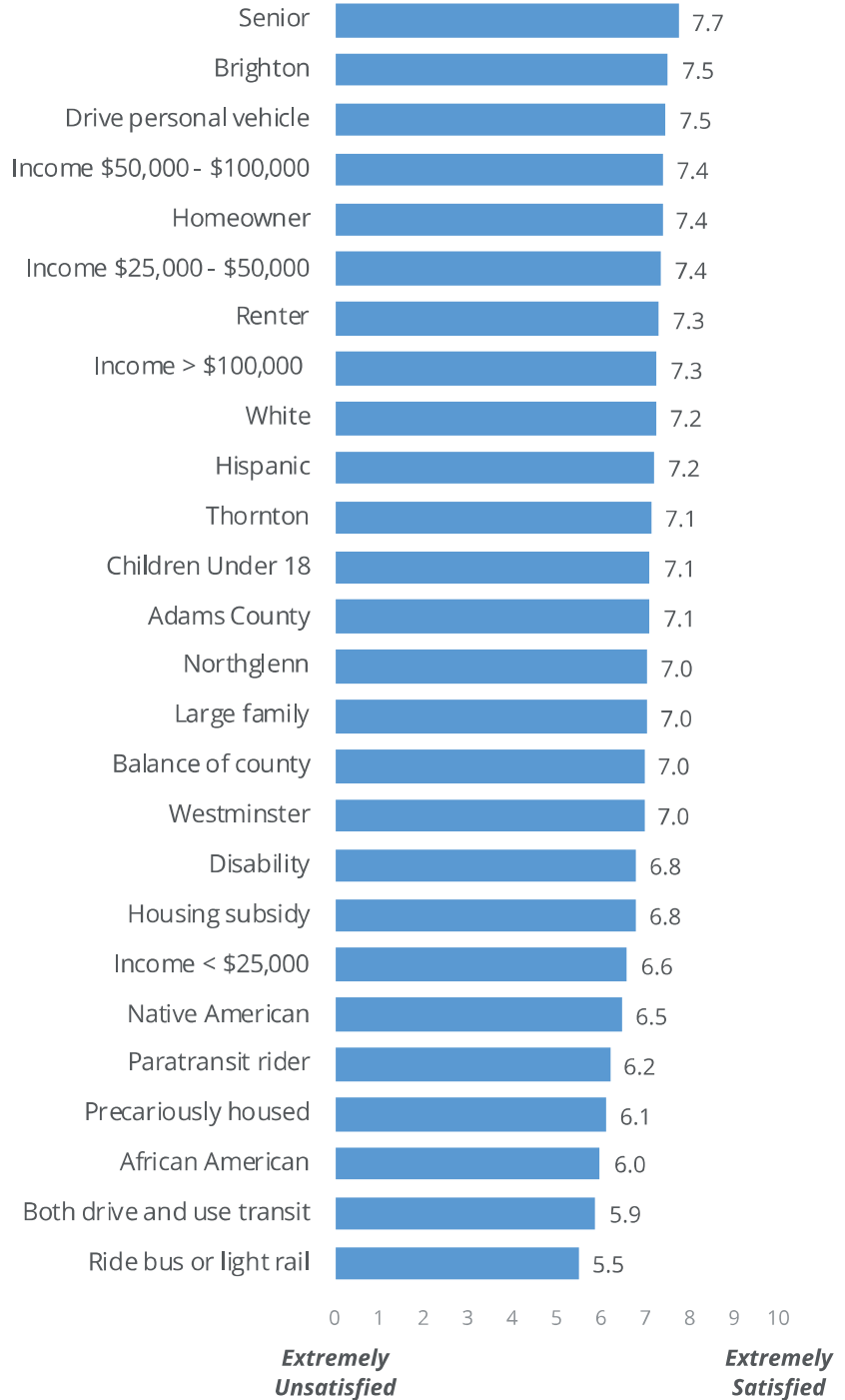
Note: Areas with blue shading indicate transit markets with standard (average) service. Areas with light orange shading are medium transit markets with below standard service, light red are high transit markets with below standard service, and the darkest red areas are the strongest transit markets with below standard service.

Source: Root Policy Research from <https://alltransit.cnt.org/gap-finder/>.

Transportation satisfaction. Figure IV-21 shows that while most respondents are satisfied with their transportation situation, transit users and African Americans are not.

Figure IV-21.
On a scale from 1 to 10, where 1 is “Extremely Unsatisfied” and 10 is “Extremely Satisfied,” how satisfied are you with your transportation situation?

Source:
 Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.



The reasons why respondents are unsatisfied with their transportation situation fall into four primary themes—problems with public transit, cost of transportation, desire to own a vehicle, and car repair needs. Examples of why residents are unsatisfied related to vehicle repairs and public transit include:

Public transit—access, accessibility, efficiency, and routes

- *“Access to bus/other transit is almost zero. We have to walk more than a mile to reach a bus stop that really doesn’t go anywhere.” (Resident survey respondent)*
- *“Because if I didn’t have my car, I would not be able to get around because of my disabilities where I can’t walk enough to get to public transportation.” (Resident survey respondent)*
- *“My car is old and has lots of problems so I worry it will break down. But I need it to get my disabled son to school and we have many doctor’s appointments and therapy that are far and would take a long time on busses to get to. I am a single mother of three with one disabled child and disabled myself. So we have 2-3 appointments a week and if we had to use the bus my kids would miss a lot of school and/or I would be late to picking them up.” (Resident survey respondent)*
- *“Because there is only 1 bus that runs out into Brighton and is very limited and does not run on the weekends.” (Resident survey respondent)*
- *“Buses are expensive and unreliable.” (Resident survey respondent)*
- *“Hard getting around on the bus with 3 children.” (Resident survey respondent)*
- *“Light rail isn’t up and running yet. Purchased the home two years ago because of the light rail.” (Resident survey respondent)*

Cost of transportation

- *“At times I do not have gas money, or money for bus.” (Resident survey respondent)*
- *“Because I can’t afford the plates on my vehicle.” (Resident survey respondent)*
- *“Bus rates too high. Vehicle too old; can’t afford a new one.” (Resident survey respondent)*
- *“I have a driver’s license with a spotless driving record but can’t afford a car or insurance which would help me so much with job opportunities.” (Resident survey respondent)*

Desire to own a car

- *“I need my own car because the bus takes too long to get everywhere I need to be in one day.” (Resident survey respondent)*
- *“I would like to have my own transportation instead of borrowing.” (Resident survey respondent)*

Vehicle needs repair

- *“My car is in need of some major work, I can’t afford.” (Resident survey respondent)*
- *“My car is a ‘91 Buick with numerous issues I’m very grateful that I have a car that runs however I know it’s only a matter of time before it is unable to stay mobile the transmission is about to go.” (Resident survey respondent)*

Healthy Communities

Healthy neighborhood indicators were measured in the resident survey conducted for this AI and include:

- The relative quality of parks and recreation facilities among neighborhoods,
- Convenient access to grocery stores and health care facilities,
- Having a supportive network of friends or family,
- Neighborhood housing condition, and
- Crime.

Figures IV-22 through IV-24 present the extent to which respondents agree with a series of statements about healthy neighborhood indicators and examines similarities and differences by housing situation, income, and respondent characteristics. Respondents rated their agreement with each statement on a scale of 1 to 10, where 1=strongly disagree and 10=strongly agree.

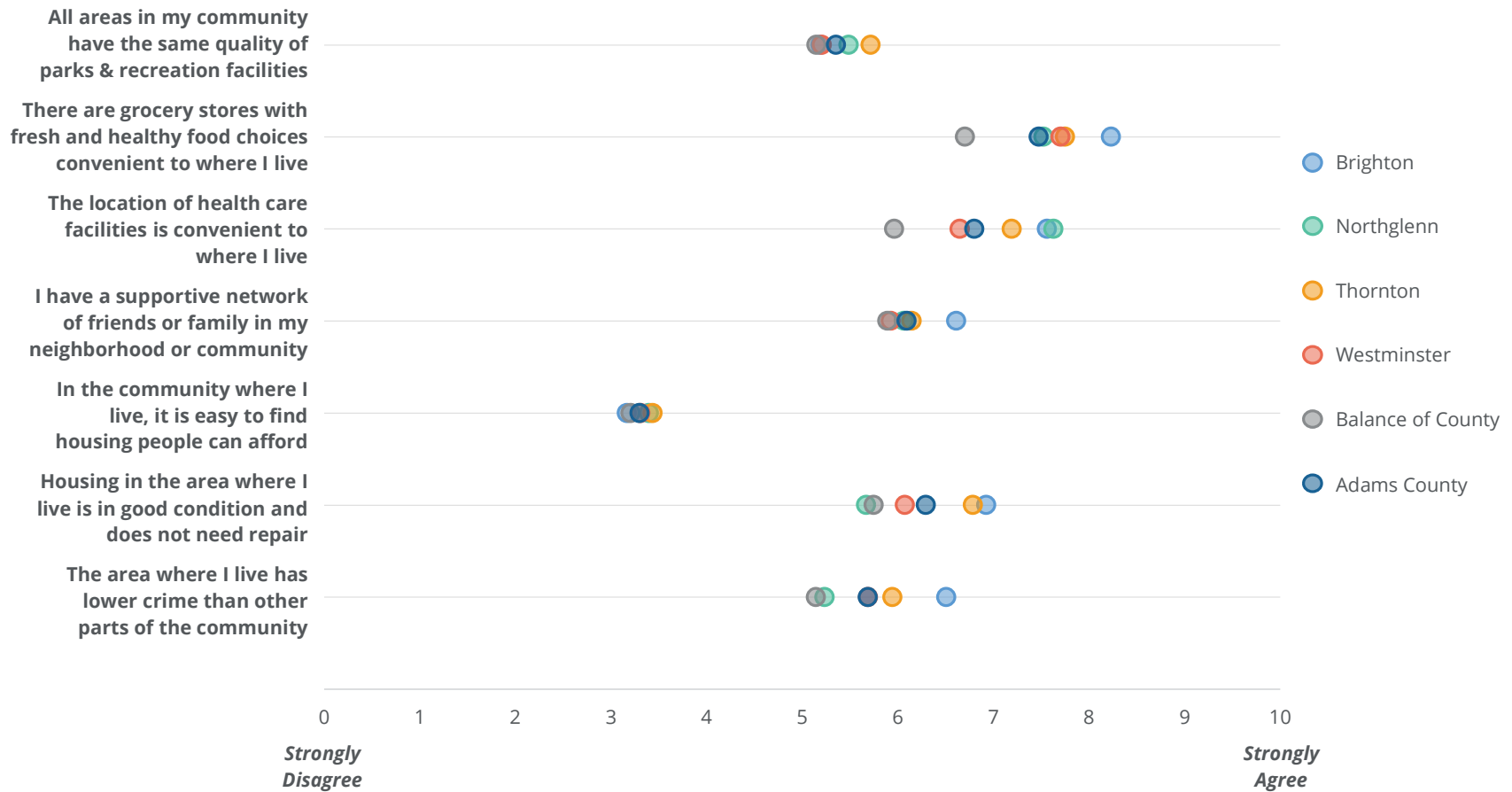
Some key findings include:

- With the exception of indicators related to housing affordability, respondents tend to agree (average ratings of 5.0 or higher) that the healthy neighborhood indicator applies to them or their neighborhood.
- Among jurisdictions, Brighton residents are more likely to more strongly agree that an indicator applies, while Balance of County are more tepid in their level of agreement.
- Higher income households and homeowners also tend to more strongly agree that healthy neighborhood indicators apply to them.
- While most of the differences are modest, the ratings of healthy neighborhood indicators by African American respondents tend to be lower than all other respondent groups and the ratings of seniors tend to be highest. In particular, African American respondents are less likely to agree all areas in the community have the same quality of park and recreation facilities, that they have convenient access to health care facilities, and to having a supportive network of friends or family in the community.
- The greatest variation in access to healthy neighborhood indicators falls along class and housing tenure lines. Residents who have housing subsidies, rent, have household incomes less than \$25,000 or from \$25,000 up to \$50,000, and who are precariously housed are all less likely to agree that their neighborhood has lower crime. These same resident segments are less likely to agree than homeowners or more affluent

respondents that homes in their neighborhood are in good condition and do not need repair.

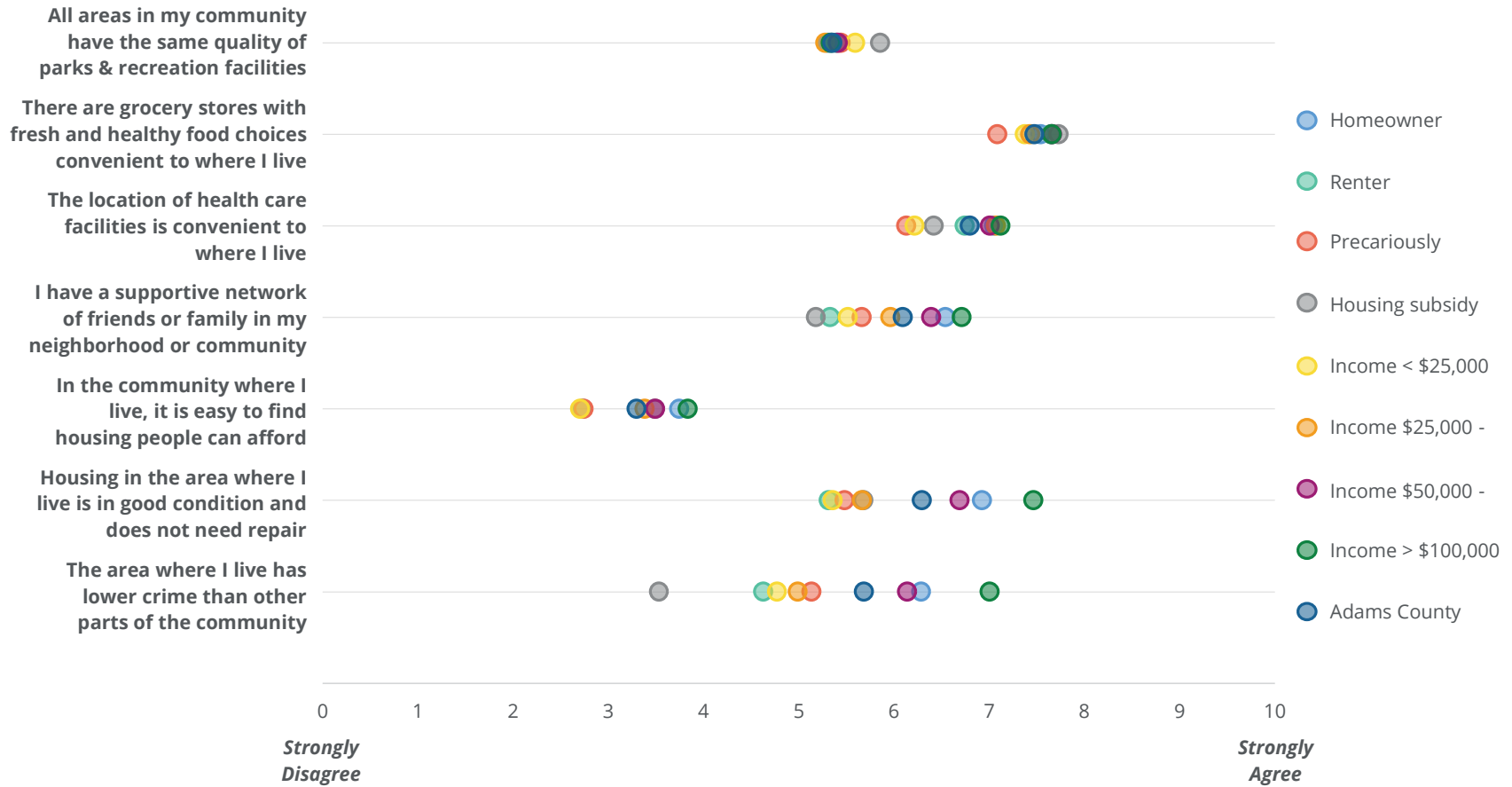
- Respondents disagree with the statement that “in the community where I live, it is easy to find housing people can afford.” Disagreement is consistent regardless of where the respondent lives and there is no meaningful variation among members of protected classes on this measure. Not surprisingly, the greatest variation is found when this indicator is considered by income and housing tenure. While still disagreeing, homeowners and the highest income households are less likely to disagree than the lowest income households and those who are currently precariously housed.
- There are no meaningful differences by jurisdiction, income, or housing tenure, and modest differences by respondent characteristics related to indicators of park quality or convenient access to grocery stores. As noted above, African Americans are less likely to agree with indicator statements and seniors are more likely to agree.

Figure IV-22.
Resident Perspectives on Healthy Neighborhood Indicators, by Jurisdiction



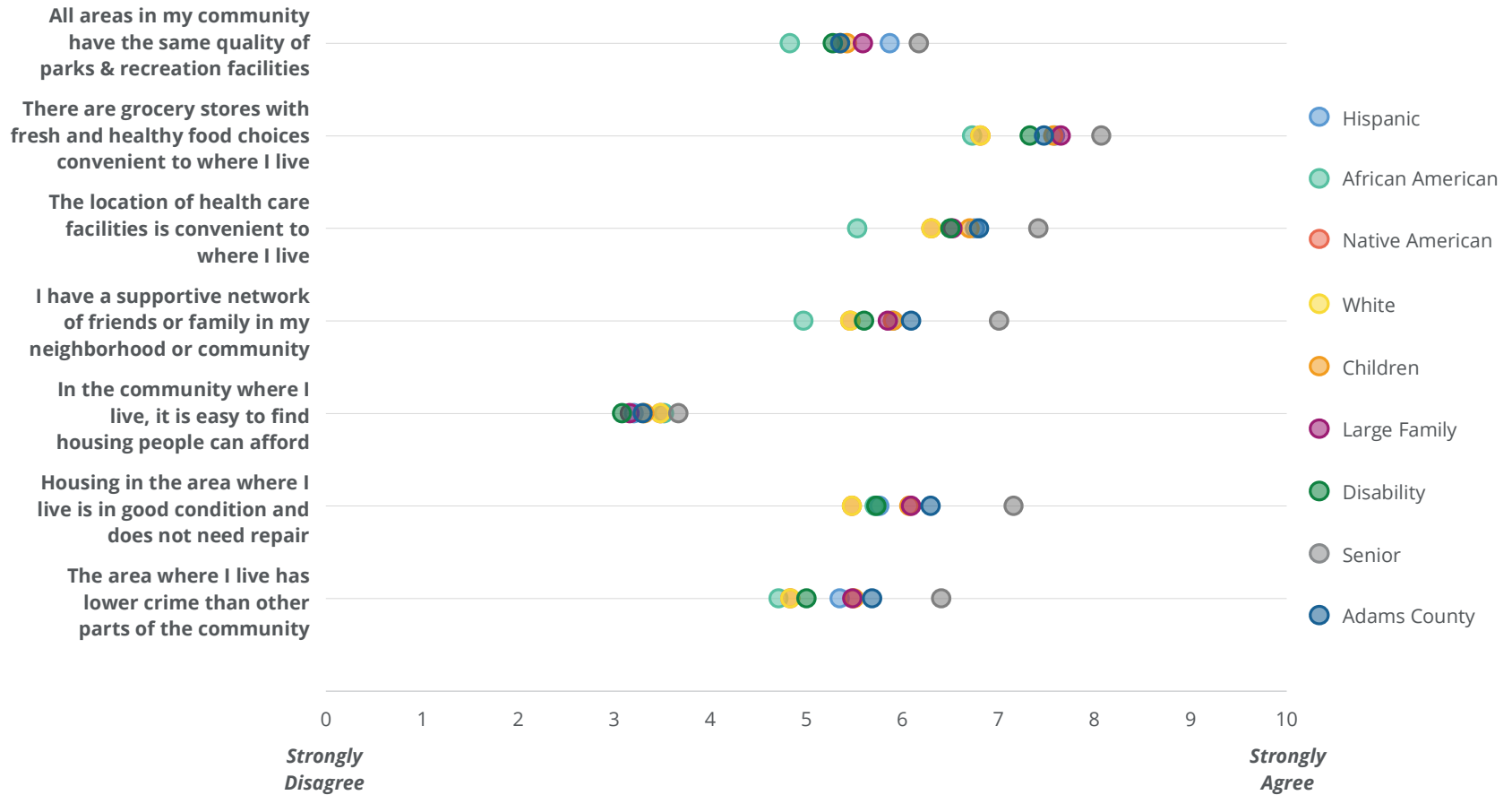
Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure IV-23.
Resident Perspectives on Healthy Neighborhood Indicators, by Housing Situation and Income



Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Figure IV-24.
Resident Perspectives on Healthy Neighborhood Indicators, by Select Respondent Characteristics



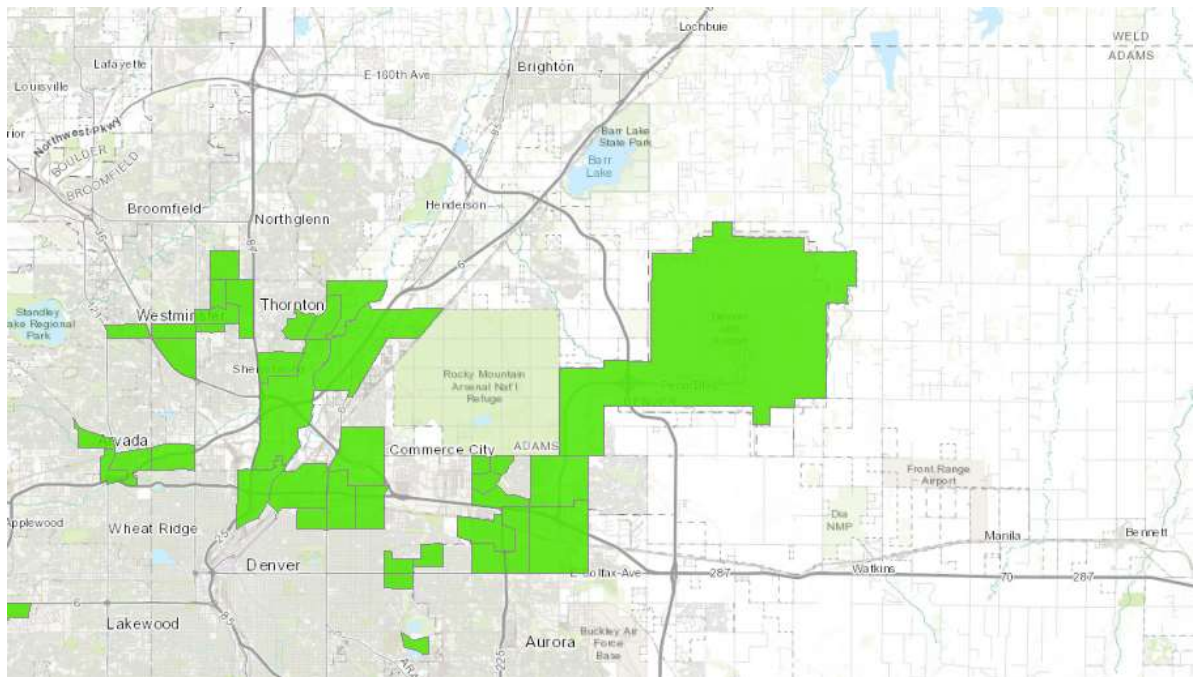
Source: Root Policy Research from the 2020 Adams County Housing and Community Needs Resident Survey.

Food provision. This section discusses access to healthy food, a major factor that contributes to overall health and wellness of a population.

Access to health food retailers. The United States Department of Agriculture (USDA) provides several metrics to evaluate food access in their Food Access Research Atlas (2015). The USDA states, "low access to healthy food is defined as being far from a supermarket, supercenter, or large grocery store ("supermarket" for short). A census tract is considered to have low access if a significant number or share of individuals in the tract is far from a supermarket."

Figure IV-25 shows USDA defined food deserts (1 mile urban/10 miles rural definition) for Census tracts in Adams County. Twenty tracts in the county are identified as food deserts. One in four USDA food deserts in the county are Census tracts with a concentration (greater than 1.5 times the county proportion) of African American residents and 35 percent are Census tracts with a concentration of Hispanic residents. The average poverty rate in a food desert is 18 percent compared to 10 percent in tracts not designated as a food desert.

Figure IV-25.
Food Deserts and Snap Recipients, Adams County, 2018



Note: Low-income census tracts where a significant number or share of residents is more than 1 mile (urban) or 10 miles (rural) from the nearest supermarket.

Source: USDA Economic Research Service and ESRI

According to the Colorado Department of Public Health and Environment, children are much more likely to consume fast food rather than fruits or vegetables. The percent of children (1 to 14 years old) who ate fruit two or more times per day and vegetables three or more times per day was 9 percent in Adams County compared to 11 percent statewide. The percent of children (1 to 14 years old) who consumed one or more sugary beverages per day was 19 percent in Adams County compared to 16 percent in Colorado.

Food insecurity. In Colorado 9.2 percent of households experience low or very low food security with 3.8 percent of households experiencing very low food security.⁷ According to the report “Home Equity: A Vision of Housing Security, Health, and Opportunity” by the Colorado Health Institute, housing and food insecurity in Colorado go hand in hand. Housing cost burdened households with children spend an average of \$190 less per month on food compared to similar households with access to affordable housing.

Children and seniors are particularly vulnerable to food insecurity. In Colorado, one in eight kids do not know when or where they will get their next meal and 1 in 30 seniors are forced to choose between food or needed medications.⁸ Feeding America estimated that 9 percent of the total county population and 12 percent of children were food insecure in 2018. Feeding American states on their website: “Food insecure households are not necessarily food insecure all the time. Food insecurity may reflect a household’s need to make trade-offs between important basic needs, such as housing or medical bills, and purchasing nutritionally adequate foods.”⁹

⁷ <https://www.ers.usda.gov/webdocs/publications/90023/err-256.pdf?v=0>

⁸ <https://www.hungerfreecolorado.org/hungerfacts/>

⁹ <https://map.feedingamerica.org/county/2018/child/colorado/county/adams>

SECTION V.

DISPROPORTIONATE HOUSING NEEDS

SECTION V.

Disproportionate Housing Needs

The primary purpose of a disproportionate housing needs analysis is to determine how access to the housing market and housing choice differ for members of protected classes. Disproportionate needs analyses can also identify where gaps in housing markets exist for all residents and facilitate goal-setting and strategic housing planning.

To that end, this section:

- 1) Analyzes rental housing needs and gaps in attaining homeownership, by jurisdiction and compared to the region overall;
- 2) Identifies where needs differ by protected class;
- 3) Assesses how these differences affect housing choice. This includes geographic choice as well as differences in public and private housing options.
- 4) A separate section reviews zoning ordinances and land use codes for potential barriers to housing choice.

Primary Findings

The data analysis in this section finds the most severe disproportionate needs in:

- **Severe cost burden.** Hispanic households, Asian households, and, especially African American households, are much more likely to be severely cost burdened than non-Hispanic White households. Based on this measure, these households are 1.5 to 2 times as likely to experience eviction and homelessness due to inability to keep up with their rent or mortgage payments.
- **Doubling up.** A common response to managing rising housing costs is doubling up. According to the resident survey, more than 25 percent of Adams County households are doubled up—defined as someone over the age of 18 living in the survey respondent’s home because the other adult cannot afford to live on their own. The highest rates of doubling up occur for Native American residents, residents who have a household member with a disability, and/or large families.
- **Homeownership rates.** Large gaps in homeownership exist for African American and Hispanic households in Adams County; moderate gaps exist for Asian households. Forty-two percent of African Americans own their homes compared to 73 percent of non-Hispanic White households. The ownership rate for Hispanic

households is 53 percent and, for Asian households, 62 percent. African American ownership rates vary widely among jurisdictions, with the lowest in Federal Heights (10%) and the highest in Brighton (65%). Asian ownership rates also vary by jurisdiction, while Hispanic ownership rates are more uniform.

- **Displacement.** Overall, 13 percent of Adams County households report moving in the last 5 years against their choice. Hispanic (22%), African American (20%), and Native American (20%) households experienced higher rates of displacement than Adams County households overall. Hispanic households were more likely to have been displaced due to lost job/hours reduced and eviction due to being behind on the rent, while residents with disabilities and households with children were most likely to be displaced because their rent increased. Households with children were also the most likely to have been displaced due to “living in unsafe conditions (e.g., domestic assault, harassment)” —this experience affected 22 percent of survey respondents with children who experienced displacement.
- **Access to mortgage loans.** Discrepancies exist in the ability to access a mortgage loan and achieve homeownership. Loan applications submitted by Black or African American applicants resulted in a mortgage loan denial 27 percent of the time. Hispanic applicants were denied 20 percent of the time. This compares to 14 percent for non-Hispanic White applicants.

More concerning is the high proportions of high-cost loans that African American and Hispanic borrowers received in 2018—an area to monitor. The disparities in subprime loans and predatory lending during the Great Recession disproportionately affected African American and Hispanic owners and led to high rates of foreclosures.

The resident survey, the findings of which are discussed in detail in Section II, reveals a persistent pattern of disproportionate housing needs for African American residents in particular—including the experience of displacement and displacement, residing in a high crime neighborhood, and experiencing discrimination in accessing housing.

Indicators of Disproportionate Needs

There is no formal definition or mechanism to measure housing needs, much less disproportionate needs. In housing market studies, housing needs are typically measured by:

- Cost burden—when a household pays more than 30 percent of their income in housing costs including basic utilities and property taxes; and Severe cost burden—when a household pays more than 50 percent of their income in housing costs. This is also an indicator of eviction or foreclosure, and homelessness;
- Homeownership rates and access to mortgage loans; and

- The cost of housing (rents, purchase prices).

Our focus on disproportionate needs furthers that analysis by:

- Identifying the *differences* in the above housing needs indicators for residents of various protected classes;
- Examining additional factors that affect choice and further economic opportunity, which is largely informed by the resident survey and review of housing policies;
- Analyzing whom the private market serves, if the market is addressing housing needs of protected classes differently needs, and if discrimination is at play—again, informed by the resident survey.

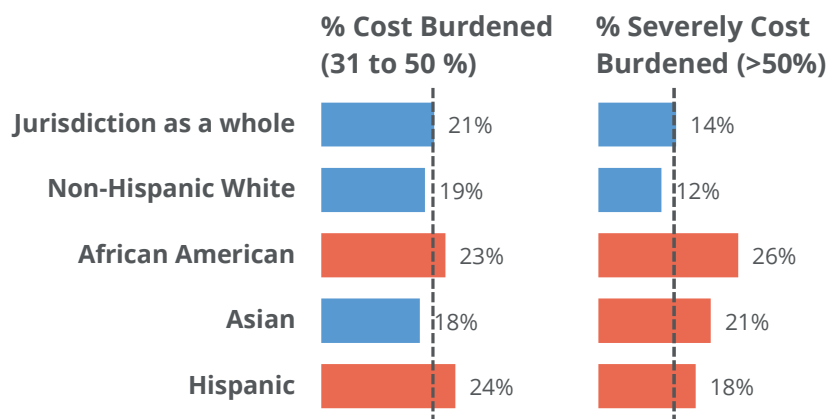
Housing Cost Burden

Figure V-1 shows the percent of Adams County households that are cost burdened (paying between 31 and 50% of their income toward housing) and households that are severely cost burdened (paying more than 50% of their income toward housing) by race and ethnicity. Countywide 35 percent of households are cost burdened (21%) or severely cost burdened (14%).

African American and Hispanic households are disproportionately impacted by severe cost burden in Adams County. Nearly half (48%) of all African American households are cost burdened, with 26 percent severely cost burdened. Forty-two percent of all Hispanic households are cost burdened, with 18 percent severely cost burdened. . Meanwhile, only 30 percent of non-Hispanic White households are cost burdened or severely cost burdened. Asian households—who typically have similar or better measures of housing access as non-Hispanic White households—have face cost burden at similar rates to the county as a whole yet face some of the highest rates of severe cost burden .

Figure V-1.
Cost Burden by
Race and Ethnicity,
Adams County

Source:
HUD CHAS dataset. Refer to the
Data Documentation for details
(www.hudexchange.info/resource/4848/affh-data-documentation).



Rising regional housing costs and stagnant wages contribute to cost burden. Nearly half (48%) of resident survey respondents experienced an increase in their rent or mortgage payment (property tax, insurance, HOA fees, or special district fees) in 2019. The median

monthly housing cost increase from 2018 to 2019 was \$100 for both homeowners and renters, and among all jurisdictions in Adams County.

Households that are precariously housed experienced the highest median housing cost increase at \$125. Households with housing subsidies, seniors, and those with household incomes of \$25,000 up to \$50,000 experienced more modest median housing cost increases between \$65 and \$80.

Utility cost increases impacted three out of five Adams County respondents, with a median monthly increase of \$60. Utility costs increased the most for households living in Brighton (\$75) and Northglenn (\$65). Households earning less than \$25,000, precariously housed households, Hispanic households, African American households, Native American households, households with children (under 18 years old), large family households, and households with a person living with a disability all reported median utility increases above the countywide median.

Respondents who described rising housing costs frequently attributed the change to property taxes, metro district taxes/fees, or HOA fee increases or assessments.

Overall, one in five Adams County survey respondents struggle to pay their rent or mortgage, and renters are more likely than homeowners to struggle (43% v. 12%). Hispanic respondents, those with large families, children under 18, disability, or who are Native American are more likely than the average Adams County respondent to struggle to pay housing costs.

Differences in doubling up. A common response to managing rising housing costs is doubling up. According to the resident survey, more than one in four Adams County households are doubled up—defined as someone over the age of 18 living in the survey respondent's home because the other adult cannot afford to live on their own. At least one in three respondents who are Native American, who have a household member with a disability, or live in Northglenn are doubled up. Not surprisingly, large families (5+ members) are most likely to be living in doubled up circumstances.

In addition, 13 percent of Adams County respondents report that their “house or apartment isn't big enough for my family members.” Renters and the precariously housed, low income households, racial and ethnic minorities, and households with children are more likely and, in some cases, twice as likely (Hispanic, large families) to say their home isn't big enough for their household.

Homeownership Differences

For the majority of households in the U.S., owning a home is the single most important factor in wealth-building. Homeownership is also thought to have broader public benefits, which has justified decades of public subsidization. For nearly 100 years, the

federal government has subsidized ownership through the mortgage interest tax deduction and the secondary mortgage market.¹

Yet these incentives for ownership have been in place far longer than the existence of fair lending and fair housing protections, meaning that the benefits of federal subsidies for ownership have not been equally realized by all protected classes. This explains some of the reason for ownership disparities today, in addition to the now-illegal practices of redlining, steering, blockbusting, unfair lending, and discriminatory pricing.²

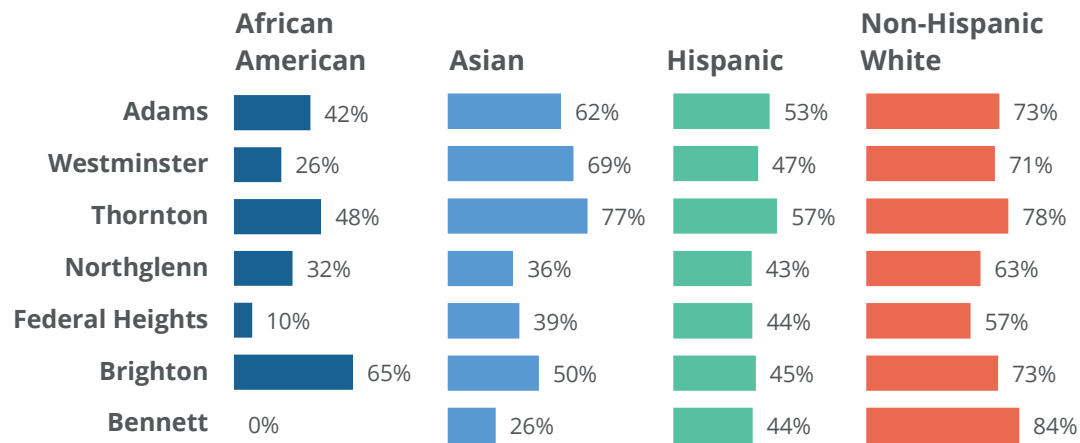
Figure V-2 below shows homeownership rates by race and ethnicity for the county overall and in jurisdictions in the county. Non-Hispanic White households have the highest rate of homeownership countywide (73%) followed by Asian households (62%).

- African American households have the lowest rate of homeownership in all jurisdictions except for Brighton where the homeownership rate among African Americans is 65 percent. In other jurisdictions homeownership ranges from 10 percent in Federal Heights to 48 percent in Thornton for African Americans.
- Asian households—who typically have similar or better measures of housing access as non-Hispanic White households—have high rates of homeownership countywide (62%) and in Westminster (69%) and Thornton (77%). However, Asian households have lower rates of ownership in Northglenn, Federal Heights, Brighton, and Bennett.
- Hispanic households have uniformly moderate levels of homeownership across jurisdictions. Homeownership rates for Hispanic households range from 43 percent in Northglenn to 57 percent in Thornton.
- Non-Hispanic White households have the highest rates of homeownership countywide and in all jurisdictions. Homeownership rates for non-Hispanic White households range from 57 percent in Federal Heights to 84 percent in Bennett.

¹ Despite the many public and private interventions to expand ownership, the overall U.S. rate has been stubbornly stagnant. In 2015, 63.7 percent of households were owners, compared to 63.9 in 1990. Contrary to what many U.S. residents believe, the U.S. does not lead developed countries in homeownership. Instead, the U.S.' rate of ownership is similar to that of the United Kingdom (63.5%) and lower than Canada's (67.0%).

² "Steering" refers to the practice of showing home- and apartment-seekers homes only in neighborhoods with residents of similar races and ethnicities; it is now illegal for real estate agents to engage in steering. "Blockbusting," which is also illegal, refers to the practice of real estate agents and builders convincing homeowners to sell their homes below market because of the fear that minorities could be moving into the neighborhood, and then reselling those homes to minorities at inflated prices. "Discriminatory pricing" means intentionally charging certain protected classes more for housing than others and is often a product of steering, blockbusting, subprime lending, and other illegal practices.

Figure V-2.
Homeownership Rate by Race and Ethnicity, 2018



Source: 2018 ACS 5-year estimates, Root Policy Research

Differences in Housing Challenges

According to the resident survey conducted for this AI, overall, 30 percent of Adams County households face housing challenges. These proportions are much higher for African Americans (53%), residents of Hispanic descent (45%), Native Americans (44%), and households earning lower than \$25,000 (57% have housing needs)—which is correlated with race and ethnicity.

The following housing challenges emerged as particularly acute for certain subpopulations but were not prevalent among Adams County households overall.

- I have bad credit/history of evictions/foreclosure and cannot find a place to rent.*** Top 10 challenge for African American respondents, Native American respondents, respondents whose household includes a member with a disability, respondents with household income less than \$25,000, and Northglenn respondents.

“When we heard we would be evicted, we were struggling to figure out what to do. The only place we found was the Denver Rescue Mission. It was \$650/month to live there and then you still pay for your food. My kids didn’t qualify because they didn’t make enough money, so they weren’t able to go there. That was the only place we found. The places that “help” don’t do anything for you if you don’t meet their requirements. My kids ended up motel to motel.” (Resident focus group participant)

- Neighborhood does not have safe places for children to play outside.*** Top 10 challenge for respondents with a housing subsidy.

"I don't let my kids go anywhere without me. I have look into sex offender lists—we have 500 people from 80th to 60th! There are sex offenders everywhere. I take my kids everywhere or have someone with them so that they aren't out by themselves." (Resident survey participant)

- **High blood pressure, stress, stroke, or heart disease because of conditions in the home or neighborhood.** Top 10 challenge for respondents with a housing subsidy.
- **My home/apartment is in bad condition.** Top 10 challenge for Native American respondents.

Differences in displacement experience. In the last five years, according to the resident survey, one in eight (13%) Adams County households experienced displacement—that is, they had to move out of a home in Adams County when they did not want to move. Those households with the highest displacement rates include:

- **Precariously housed.** Two in five (43%) of respondents who are currently precariously housed experienced displacement from a residence in Adams County in the past five years. Three in 10 had to move because rent increased more than they could pay and one in four were evicted for being behind on the rent.
- **Renters.** Three in 10 renters (30%) report recent displacement, and a plurality (42%) attribute the displacement to increased rent.
- **Low income households.** Households with incomes less than \$25,000 who experienced displacement (26%) are more likely than Adams County respondents overall to cite lost wages (22%) and eviction due to being behind on the rent (22%) as reasons for displacement.

Although not as pronounced as displacement experienced by those who are precariously housed, renters in general, and low income households, at least one in five Hispanic (22%), African American (20%), and Native American (20%) respondents report being displaced in Adams County in the past five years.

The reasons for displacement varied among protected classes:

- Hispanic respondents were more likely to have been displaced due to lost job/hours reduced (33%) and eviction due to being behind on the rent (29%) than any other respondent segment.
- Hispanic households and households with children were more likely than any other displaced respondents to have been displaced due to “living in unsafe conditions (e.g., domestic assault, harassment)” —22 percent of respondents with children and 20 percent of Hispanic respondents.

- Respondents who are disabled or have a household member with a disability and respondents with children under 18 are most likely to cite “rent increased more than I could pay” as the reason for displacement (48% each).

Access to Credit

Several factors contribute to the differences in homeownership by race and ethnicity observed above, including disparities in access to lending. Home Mortgage Disclosure Act (HMDA) data can shed light on the role of access to credit in homeownership differences by race and ethnicity. HMDA data is collected by the Federal Financial Institutions Examination Council (FFIEC) which provides data used in the analysis of mortgage lending practices.

HMDA data include variables such as race, Census tract, loan type, and loan purpose. And, while these variables can be used to explain many of the reasons for any lending disparities (e.g., poor credit history), they do not contain all of the factors that are evaluated by lending institutions when they decide to make a loan to an applicant.

This section uses the analysis of HMDA data to examine disparities in lending and loan denials across different racial and ethnic groups and income categories, to determine if loans are being apportioned more favorably to some racial and ethnic groups as opposed to others.

Loan applications in Adams County. During 2018, there were 26,541 loan applications made for residential properties in Adams County. Among these loans, nearly two in three (63%) were conventional loans, over a quarter (27%) were Federal Housing Administration (FHA) insured loans, and most of the remaining loans (10%) were Veterans Affairs (VA) guaranteed loans. Figure V-3 reveals the distribution of loans by loan type.

**Figure V-3.
Loan Applications
by Loan Type,
Adams County, 2018**

Note:

Does not include loans for multifamily properties or non-owner occupants. n = 26,541

Source:

HDMA Raw Data 2018 and Root Policy Research.

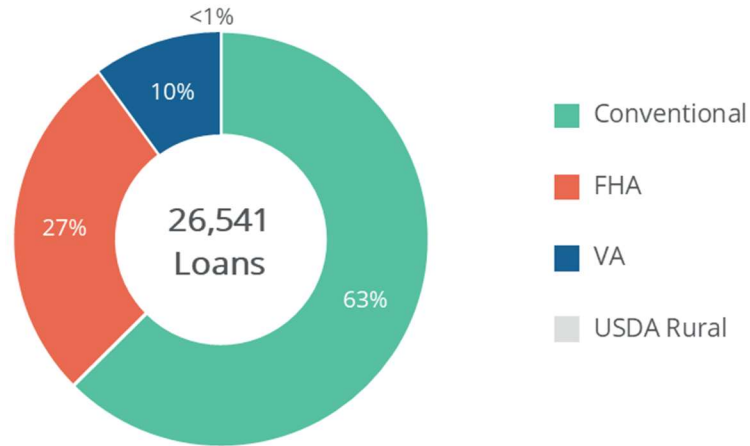


Figure V-4 shows loan types. Just under half (45%) of all loan applications were for home purchases while nearly a third (35%) were cash-out refinancing loans, and another 16 percent were refinancing loans. A very small portion (2%) were home improvement loans (although cash-out refinancing may have also been intended for home improvements).

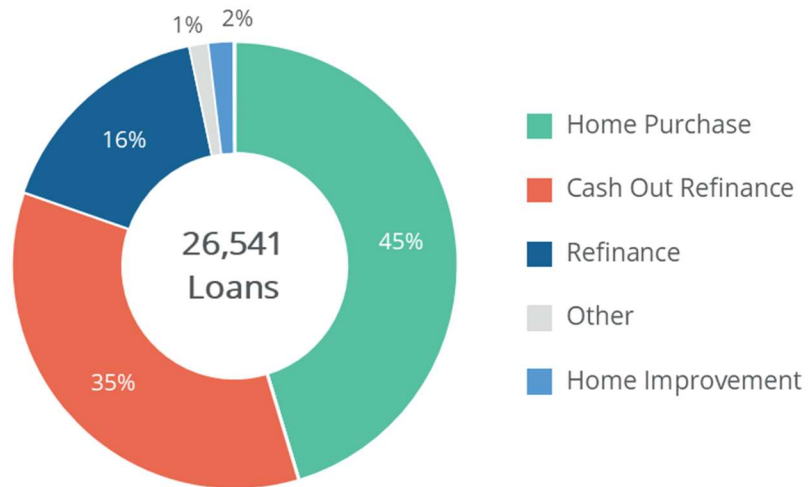
**Figure V-4.
Loan Applications
by Loan Purpose,
Adams County, 2018**

Note:

Does not include loans for multifamily properties or non-owner occupants. n = 26,541

Source:

HDMA Raw Data 2018 and Root Policy Research



Of the loan applications in Adams County in 2018, the majority (59%) resulted in the loan being originated; 19 percent of applications were withdrawn by the applicant; and 16 percent of applications were denied. A smaller proportion of applications had files that were closed for incompleteness (4%), and only 2 percent of applications were approved by not accepted by the applicant.

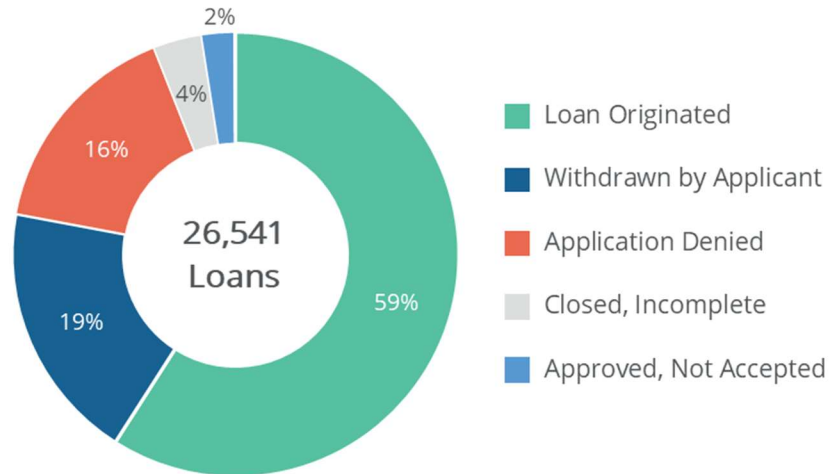
**Figure V-5.
Loan Action Taken,
Adams County, 2018**

Note:

Does not include loans for multifamily properties or non-owner occupants. n = 26,541

Source:

HDMA Raw Data 2018 and Root Policy Research



Loan outcomes by race/ethnicity. Figure V-6 presents detailed outcomes of the loan applications, focusing on the difference in outcomes among racial and ethnic groups.³

Loan originations were lowest among Black or African American applicants. With an origination rate of 49 percent, Black or African American applicants' loans were originated at 12 percentage points less than for White applicants, whose origination rate of 61 percent was the highest among racial and ethnic applicant groups. Asian applicants had a similarly high origination rate (60%) to White applicants. The Hispanic applicant origination rate was 55 percent.

Conversely, for denials: Applications submitted by Black or African American would-be-borrowers resulted in a denial 27 percent of the time—13 percentage points higher than for White applicants. One in five applications (20%) from Hispanic applicants resulted in an application denial. There were less significant discrepancies among other actions taken, including applications that were not accepted by the applicant, withdrawn applications, and files that were closed for incompleteness.⁴

³ Applicants who identified as having one race and either identified their ethnicity as "not-Hispanic or Latino" or had "ethnicity not available" were assigned racial groups based on the one race identified, while any applicant who identified their ethnicity as "Hispanic or Latino" and had identified as any other racial category were assigned "Hispanic." Only racial or ethnic groups with over 20 total applications were included in the analysis.

Figure V-6.
Outcome of Mortgage Loan Application by Race/Ethnicity, Adams County, 2018

| | Loan Originated | Application Denied | Not Accepted by Applicant | Application Withdrawn | File Closed | Total Applications |
|---|-----------------|--------------------|---------------------------|-----------------------|-------------|--------------------|
| Adams County | 59% | 16% | 2% | 19% | 4% | 26,541 |
| Race and Ethnicity | | | | | | |
| White | 61% | 14% | 3% | 19% | 3% | 14,466 |
| Black or African American | 49% | 27% | 1% | 20% | 3% | 612 |
| Asian | 60% | 15% | 2% | 19% | 4% | 832 |
| American Indian or American Native | 50% | 22% | 3% | 18% | 8% | 117 |
| Native Hawaiian or Other Pacific Islander | 54% | 20% | 0% | 14% | 11% | 35 |
| Hispanic | 55% | 20% | 2% | 19% | 4% | 5,902 |
| Proportion Differences | | | | | | |
| Black/White Difference | -12% | 13% | -1% | 1% | 0% | -13,854 |
| Asian/White Difference | -1% | 1% | -1% | 1% | 1% | -13,634 |
| Hispanic/White Difference | -6% | 5% | 0% | 0% | 1% | -8,564 |

Note: Does not include loans for multifamily properties or non-owner occupants. Race categories include non-Hispanic and ethnicity not provided while Hispanic category includes Hispanic of any race.

Source: HDMA Raw Data 2018 and Root Policy Research

Most often, loan applications are denied due to credit worthiness, particularly low credit scores or high debt-to-income ratios. As revealed in Figure V-7, credit history and debt-to-income ratios were among the most common reasons provided for loan denial. Combined they make up over half of all reasons provided for loan denials in Adams County.

**Figure V-7.
Reasons for Denial, Adams County, 2018**

| | Credit History | Debt to Income Ratio | Insufficient Cash | Unverified Information | Collateral | Credit Application Incomplete | Employment History | Missing Data | Other |
|---|----------------|----------------------|-------------------|------------------------|------------|-------------------------------|--------------------|--------------|------------|
| Adams County | 31% | 25% | 3% | 5% | 8% | 10% | 2% | 1% | 16% |
| Race and Ethnicity | | | | | | | | | |
| White | 30% | 23% | 3% | 5% | 9% | 10% | 2% | 1% | 17% |
| Black or African American | 42% | 26% | 2% | 5% | 6% | 7% | 3% | 0% | 10% |
| Asian | 16% | 40% | 3% | 10% | 5% | 6% | 3% | 1% | 15% |
| American Indian or American Native | 39% | 32% | 3% | 0% | 3% | 6% | 3% | 0% | 13% |
| Native Hawaiian or Other Pacific Islander | 14% | 29% | 0% | 0% | 14% | 14% | 0% | 0% | 29% |
| Hispanic | 34% | 28% | 3% | 5% | 6% | 7% | 3% | 1% | 15% |
| Proportion Differences | | | | | | | | | |
| Black/White Difference | 12% | 2% | -1% | -1% | -3% | -2% | 2% | -1% | -7% |
| Asian/White Difference | -14% | 16% | 0% | 5% | -3% | -3% | 2% | 0% | -2% |
| Hispanic/White Difference | 4% | 4% | 0% | -1% | -3% | -2% | 1% | -1% | -2% |

Note: Does not include loans for multifamily properties or non-owner occupants. Percent calculated from total reasons given including multiple reasons for one applicant.

Source: 2018 HMDA Raw Data and Root Policy Research

The reasons for denial of loan applications vary by race and ethnicity: African American applicants are most likely to have loans denied due to credit history (42% of the reason for denials); Asian applicants are the most likely to have their loans denied due to high debt-to-income ratios (40% of the reason for denials). Figure V-8 compares denial rates by race and ethnicity based on loan purpose. The largest differences in denial rates occur for African Americans across all loan types. Asian applicants show the largest differences in denial rates (when compared to non-Hispanic White applicants) for cash-out-refinances. Hispanic applicants show very large differences in denials for home improvements loans.

From a policy perspective, these data suggest that Hispanic households in Adams County may be most at risk for high-cost loans (predatory, credit cards) to help with needed home improvements, and would benefit from publicly-assisted home improvement grants and low cost loans. Asian applicants may benefit from personal finance counseling to lower personal debt. African American would-be-borrowers would benefit from a range of mortgage loan and personal finance assistance to achieve homeownership.

Figure V-8.
Loan Denials by Race/Ethnicity and Loan Purpose, Adams County, 2018

| | Overall | Loan Purpose | | | |
|---|------------|---------------|------------|--------------------|------------------|
| | | Home Purchase | Refinance | Cash-Out-Refinance | Home Improvement |
| Adams County | 21% | 12% | 35% | 26% | 28% |
| Race and Ethnicity | | | | | |
| White | 18% | 10% | 33% | 23% | 16% |
| Black or African American | 36% | 25% | 48% | 41% | - |
| Asian | 20% | 11% | 40% | 34% | - |
| American Indian or American Native | 30% | 10% | 30% | 41% | - |
| Native Hawaiian or Other Pacific Islander | 28% | 8% | 40% | 44% | - |
| Hispanic | 26% | 16% | 40% | 30% | 40% |
| Denial Rate Differences | | | | | |
| Black/White Difference | 17% | 15% | 15% | 18% | - |
| Asian/White Difference | 1% | 1% | 7% | 11% | - |
| Hispanic/White Difference | 7% | 6% | 7% | 7% | 23% |

Note: Does not include loans for multifamily properties or non-owner occupants. Race categories include non-Hispanic and ethnicity not provided while Hispanic category includes Hispanic of any race. N values represent total of originated loans, denied loans, and loans approved by not accepted. White n = 11,352; Black/African American n = 474, Asian n = 639; American Indian or American Native n = 87; Native Hawaiian or Other Pacific Islander n = 26; Hispanic n = 4,549.

Source: HDMA Raw Data 2018 and Root Policy Research

Figure V-9 compares denial rates by loan types for individual racial and ethnic groups.

**Figure V-9.
Denial by
Race/Ethnicity and
Loan Purpose,
Adams County, 2018**

Note:

Does not include loans for multifamily properties or non-owner occupants. Race categories include non-Hispanic and ethnicity not provided while Hispanic category includes Hispanic of any race. N values represent total of originated loans, denied loans, and loans approved but not accepted. Non-Hispanic White n = 11,182; Black/African American n = 470, Asian n = 631; American Indian or American Native n = 86; Native Hawaiian or Other Pacific Islander n = 26; Hispanic n = 4,477

Source:

HDMA Raw Data 2018 and Root Policy Research

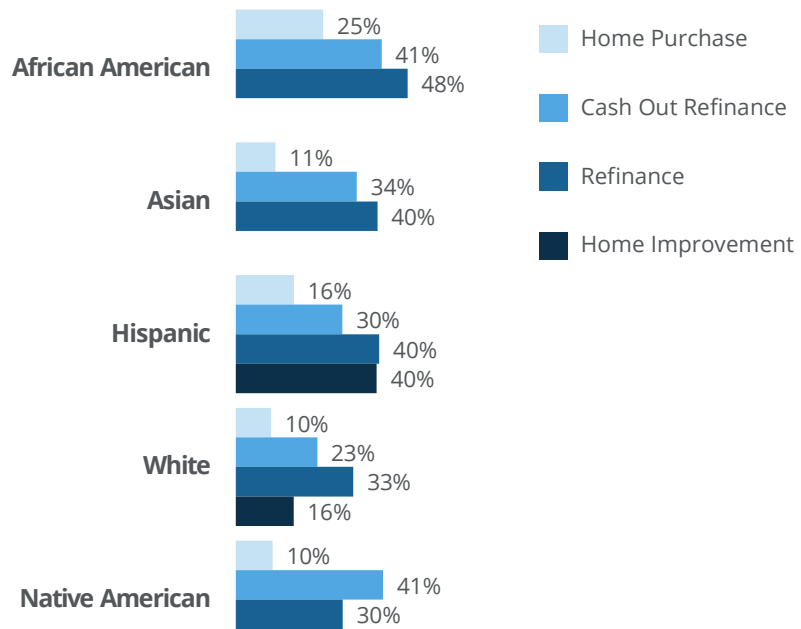
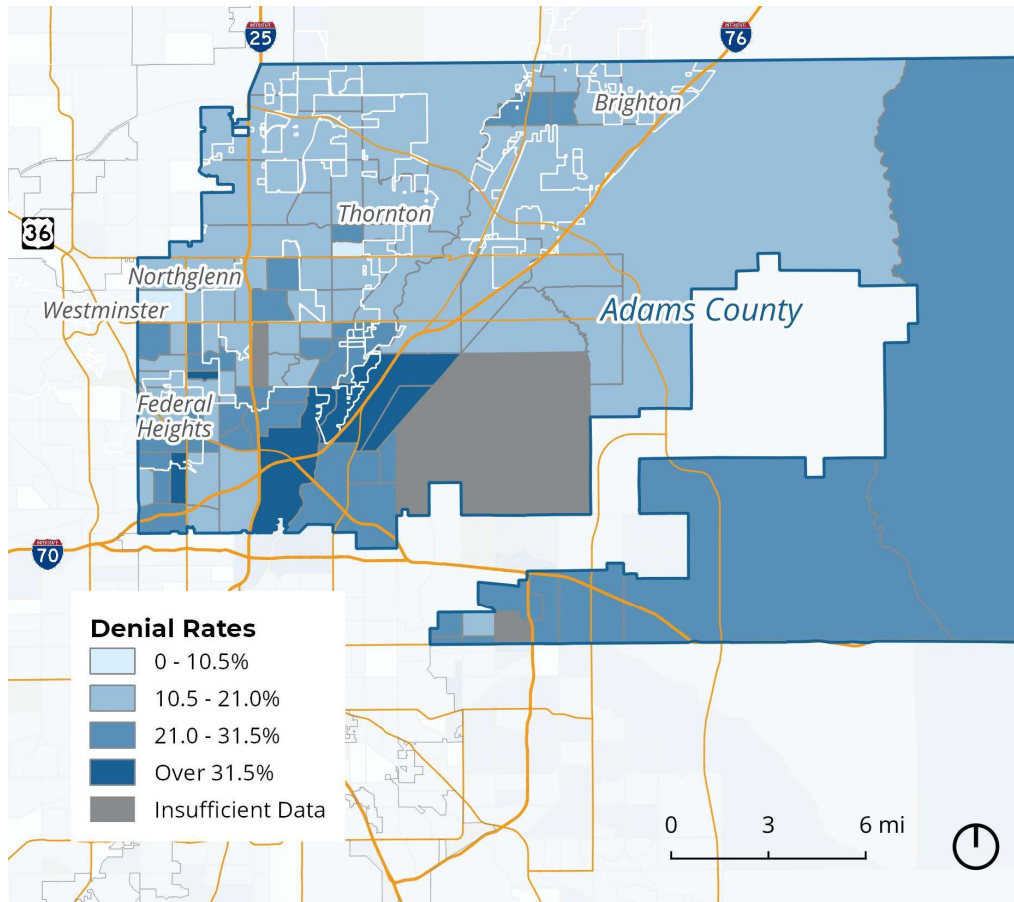


Figure V-10 shows the geographic distribution of denial rates in Adams County by Census tract. The map reveals that the highest denial rates were concentrated in southeast Adams county around the I-76 corridor including east of I-25 and one tract further north in Federal Heights. These areas correspond with areas of high minority concentrations.

Figure V-10.
Mortgage Loan Denial Rates by Census Tract, Adams County, 2018



Note: Denial rate represents the percent of denied applications of the total of originated loans, denied loans, and loans approved by not accepted. Census tracts with fewer than 20 total applications were excluded.

Source: HMDA Raw Data 2018 and Root Policy Research.

Beginning in 2004, HMDA data contained the interest rates on higher-priced mortgage loans. This allows examinations of disparities in high-cost, including subprime, loans among different racial and ethnic groups. It is important to remember that subprime loans are not always predatory or suggest fair lending issues, and that the numerous factors that can make a loan “predatory” are not adequately represented in available data. Therefore, actual predatory practices cannot be identified through HMDA data analysis. However, the data analysis can be used to identify where additional scrutiny is warranted, and how public education and outreach efforts should be targeted. For the purpose of this section we define “high priced” as a loan with an ARP of more than one and half (1.5%) percentage points above comparable treasuries.

Figure V-11 shows the proportion of loans that are subprime by race and ethnicity and income level using the HMDA-defined Median Family Income. The proportion of high-priced loans is highest among Hispanic applicants and Black or African American applicants

(19% and 18% respectively), which both reflect proportions of high-priced loans at least 10 percentage points greater than for White applicants. These exist except for the highest income levels (120% MFI). Asian applicants were the least likely to receive high-priced loans across all income levels, taking on high priced loans at lower rates than White applicants.

Figure V-11.
High Priced Loans by Race/Ethnicity and Income, Adams County, 2018

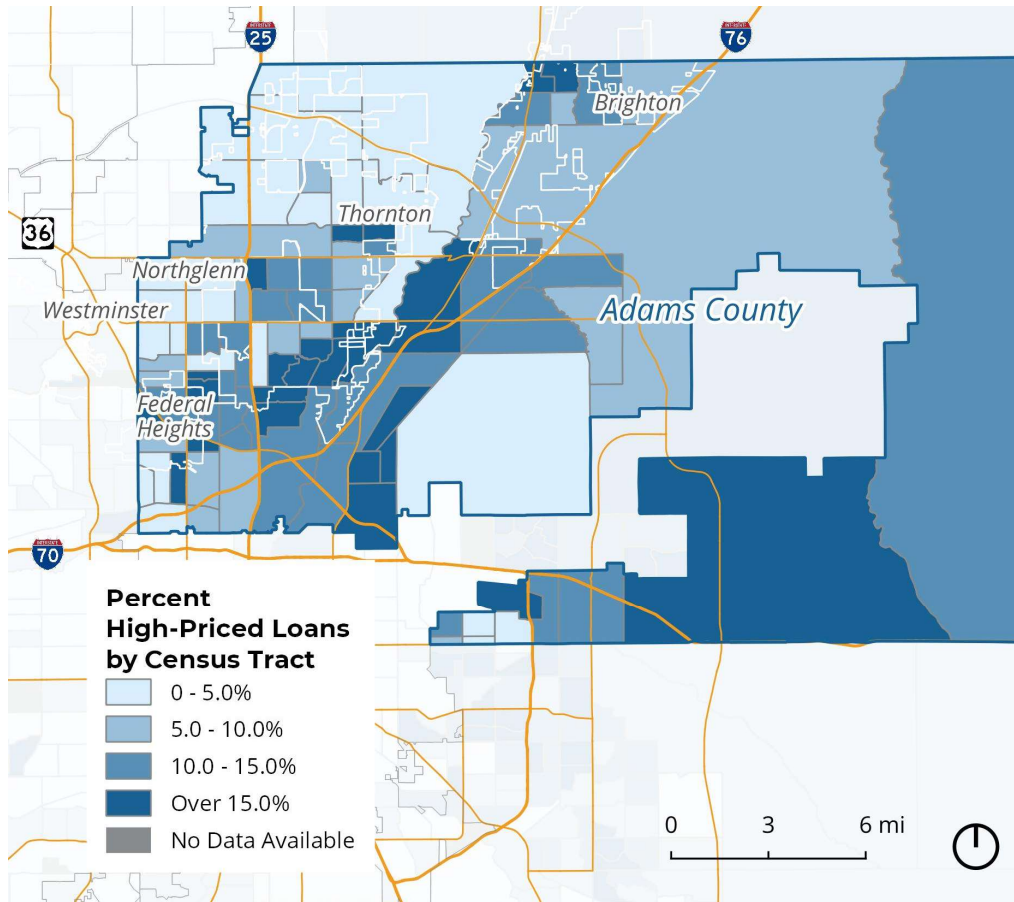
| | Overall | Median Family Income Group | | |
|---|------------|----------------------------|-------------|---------------|
| | | 0-80% MFI | 80-120% MFI | Over 120% MFI |
| Adams County | 10% | 12% | 13% | 5% |
| Race and Ethnicity | | | | |
| White | 8% | 8% | 10% | 5% |
| Black or African American | 18% | 19% | 20% | 6% |
| Asian | 5% | 5% | 7% | 2% |
| American Indian or American Native | 16% | - | - | - |
| Native Hawaiian or Other Pacific Islander | 12% | - | - | - |
| Hispanic | 19% | 19% | 23% | 9% |
| Percentage Point Differences | | | | |
| Black/White Difference | 10% | 11% | 10% | 1% |
| Asian/White Difference | -3% | -3% | -2% | -2% |
| Hispanic/White Difference | 12% | 11% | 14% | 5% |

Note: "High priced" is defined as a loan with an ARP of more than one and half (1.5%) percentage points above comparable treasuries. Percentage calculated from total originated loans. Does not include loans for multifamily properties or non-owner occupants. Race categories include non-Hispanic and ethnicity not provided while Hispanic category includes Hispanic of any race. N values represent total of originated loans when income data was available; White n = 17,050; Black or African American n = 279; Asian n = 492; Hispanic n = 6,234

Source: HDMA Raw Data 2018 and Root Policy Research.

Figure V-12 shows the geographic distribution of the proportion of high-priced loans by Census tract. Clusters of higher high-priced loan percentages exist in Thornton and in Aurora, both in the more urban areas west of I-225 and in the more rural Census tract south of the airport. There is also a cluster in northwest Brighton.

Figure V-12.
Percent High-Priced Loans by Census Tract, Adams County, 2018



Note: Does not include loans for multifamily properties or non-owner occupants. “High priced” is defined as a loan with an ARP of more than one and half (1.5%) percentage points above comparable treasuries. Percentage calculated from total originated loans.

Source: HDMA Raw Data 2018 and Root Policy Research.

Alternative financial products. Households who are rejected from traditional or even higher-cost lending products—or who are unaware of or distrust traditional lenders—use alternative financial products, many of which carry very high interest rates and inhibit financial stability and wealth-building.

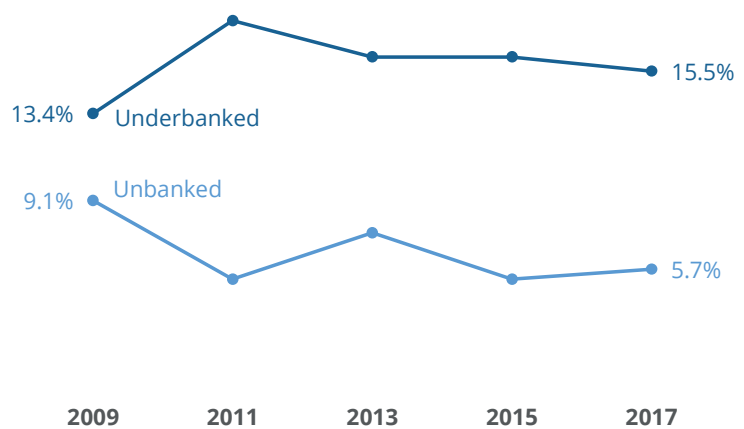
A cornerstone of the Federal Deposit Insurance Corporation’s (FDIC) economic inclusion (<https://www.economicinclusion.gov/whatis/>) project is a study of what the FDIC has identified as unbanked and underbanked households. “Unbanked” households are those in which no one in the household has a checking or savings account “Underbanked” households are those who have an account in an insured institution but also use services that are likely to charge high or very high rates. These services include checking cashing institutions, payday loans, “tax refund anticipation” loans, rent-to-own services, pawn shop loans, and/or auto title loans.

The FDIC studies the prevalence of unbanked and underbanked households every two years. The latest, 2017, survey found that:

- 1) 6.5 percent of U.S. households are “unbanked,” which is the lowest rate since the study began in 2009. The unbanked rate fell by a half of a percentage point between 2015 and 2017.
- 2) Nearly 20 percent of U.S. households—18.7 percent—are “underbanked.” This rate also fell between 2015 and 2017, by a remarkable 1.2 percentage points.
- 3) The State of Colorado has an unbanked rate of 4.8 percent, much lower than the U.S. overall. This rate was higher than in 2015, when it was 4.4 percent.
- 4) The Denver-Aurora-Lakewood MSA has a higher unbanked rate than the state overall at 5.7 percent. This is higher than in 2015 when the unbanked rate was 5.2 percent, and much lower than 2009, when the unbanked rate was 9.1 percent.

Figure V-13 shows the region’s trends in the percentage of unbanked and underbanked households.

Figure V-13.
Unbanked and Underbanked Households, Denver-Aurora-Lakewood MSA, 2009 - 2017



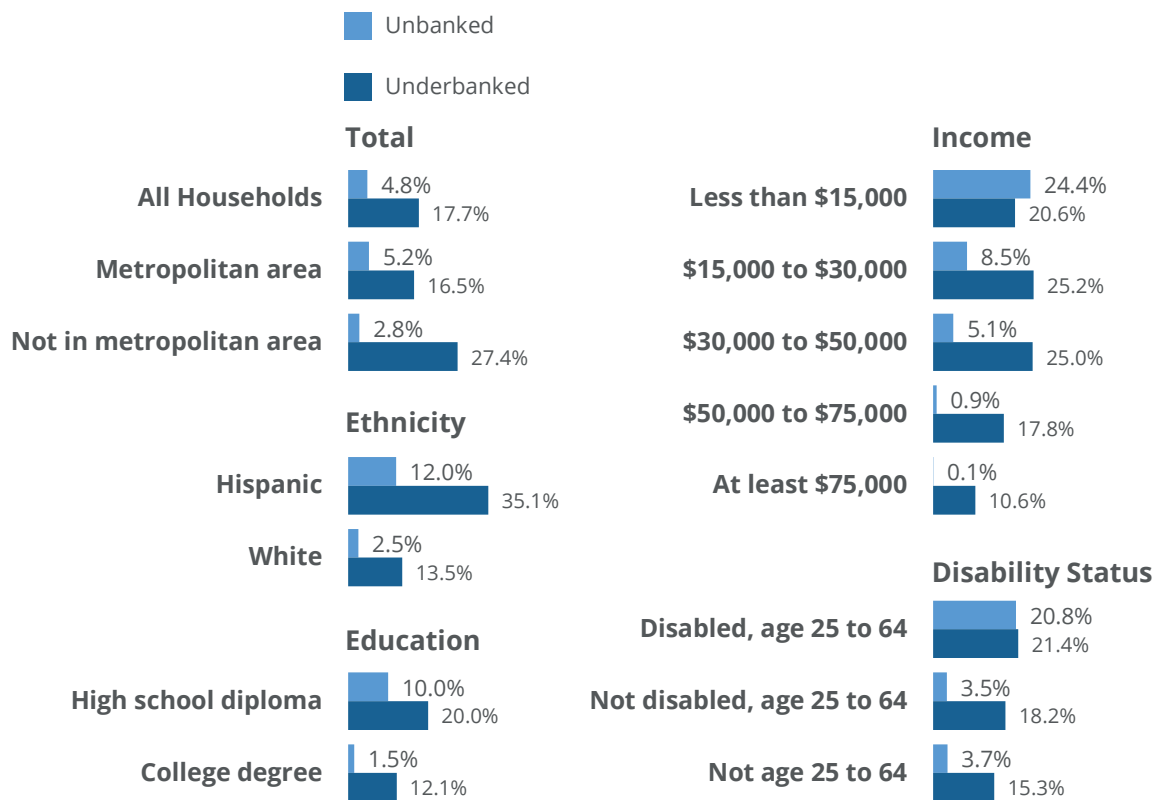
Source:
Multiyear FDIC National Survey of Unbanked and Underbanked Households.

Unfortunately, the FDIC survey data are not available by household characteristic at the regional level. However, household characteristics are available at the state level and are found in Figure V-14, which shows that:

- Hispanic households have much higher unbanked and underbanked rates than White households, with about 35 percent of Hispanic households using nontraditional financial services.
- College-educated households are much less likely than others to be unbanked or underbanked, as are high income households.

- Low to moderate income households have similar use of nontraditional financial services up to the \$50,000 income mark. This may be indicative of the growing challenges even moderate income households face in making ends meet.
- Households with a person living with a disability are more likely to be unbanked or underbanked compared to other same age households without a disability (25 to 64 years old).

Figure V-14.
Unbanked and Underbanked Households, State of Colorado by Household Characteristics, 2017



Note: Underbanked definition is based on the following AFS: check cashing, money order, remittance, payday loan, rent-to-own service, pawn shop loan, refund anticipation loan, and auto title loan.

Source: 2017 FDIC National Survey of Unbanked and Underbanked Households.

Housing Access

A growing body of recent research has bolstered the evidence that where affordable and mixed-income housing is developed has a long-term impact on the households that occupy that housing. For example:

- Dr. Raj Chetty's well known Equality of Opportunity research found positive economic returns for adults who had moved out of high poverty neighborhoods when they were children. The gains were larger the earlier children moved.
- A companion study by Dr. Chetty examining social mobility isolated the neighborhood factors that led to positive economic mobility for children. Children with the largest upward economic mobility were raised in neighborhoods with lower levels of segregation, lower levels of income inequality, higher quality schools, and greater community involvement ("social capital").
- A similar study by researchers at Johns Hopkins University found that when assisted housing is located in higher quality neighborhoods, children have better economic outcomes. The study also concluded that because low income African American children are more likely than low income white children to live in assisted housing, the location of assisted housing in poor quality neighborhoods has a disproportionate impact on African American children's long-term economic growth.

This research is counter to years of housing policies and programs that focused on building large multifamily complexes to house persons living in poverty, often placing these developments in the least desirable areas in a city. Fortunately, more recent housing policy activism has focused more intently on remedying the damage done by decades of intentional segregation. The remaining part of this section examines locational housing choice.

Location of affordable rental (LIHTC) developments. Figure V-15 shows the number of units developed using Low Income Housing Tax Credits (LIHTC). According to the HUD LIHTC property database, Adams County has approximately 3,900 total units in tax credit properties and about 3,200 (82%) are designated for low income households.

The final two columns show the geographic distribution of tax credit units throughout jurisdictions in the county compared to their respective share of the total population in 2018. Brighton, Thornton, and Northglenn each have a higher share of LIHTC units than population while Westminster has a smaller share of LIHTC units compared to their population share. Brighton has the greatest concentration of low income units with their share of units six percentage points higher than their overall share of population.

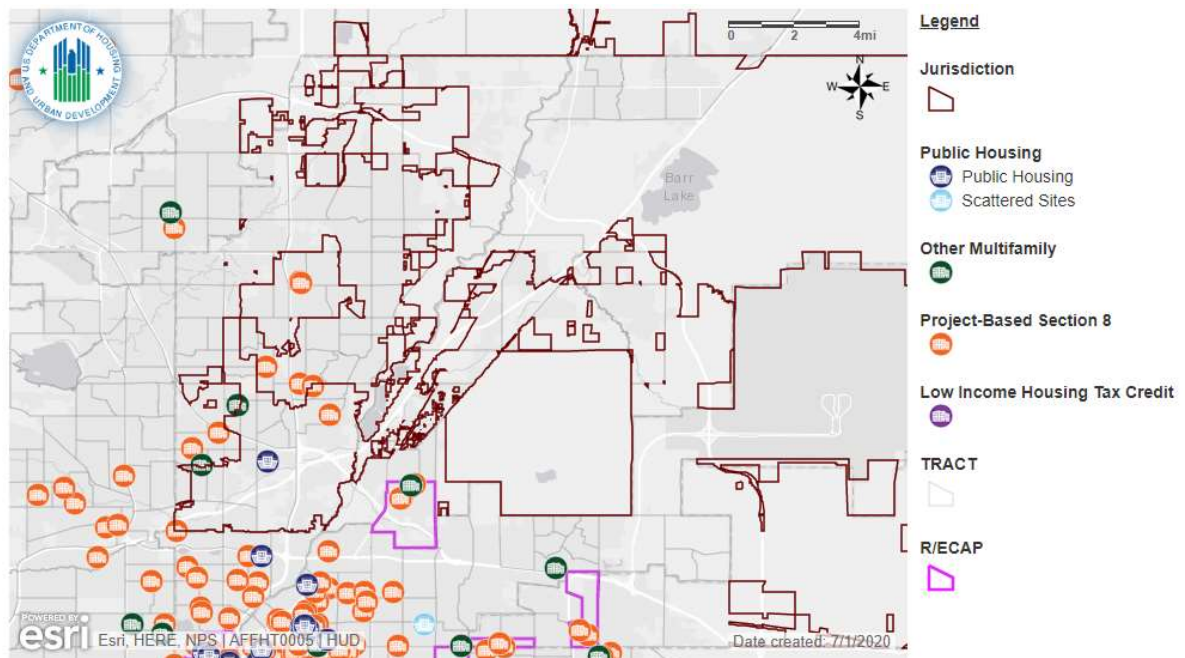
Figure V-15.
Publicly Supported Housing, Adams County

| Jurisdiction | Total Units in LIHTC | Low Income Units | % Low Income | % of County | |
|---------------------------|----------------------|------------------|--------------|----------------|-----------------|
| | | | | LI LIHTC Units | 2018 Population |
| Adams County | 3,909 | 3,213 | 82% | 100% | 100% |
| Brighton | 616 | 442 | 72% | 14% | 8% |
| Northglenn | 425 | 295 | 69% | 9% | 8% |
| Thornton | 1,077 | 937 | 87% | 29% | 27% |
| Westminster | 654 | 426 | 65% | 13% | 23% |
| Other Adams County | 1,137 | 1,113 | 98% | N/A | N/A |

Source: HUD Low-Income Housing Tax Credit Properties, 2018 ACS 5-year estimates

Figure V-16 shows a map of publicly supported housing properties using the AFFH data and mapping tool. The majority of project based Section 8 and public housing properties are located in the southwest, more urban, areas of Adams County. However, this map does not show LIHTC units in Adams County, where there is a higher number of units in the northern area of Adams County in Brighton.

Figure V-16.
Publicly Supported Housing, Adams County



Note: Underbanked definition is based on the following AFS: check cashing, money order, remittance, payday loan, rent-to-own service, pawn shop loan, refund anticipation loan, and auto title loan.

Source: HUD Affirmatively Furthering Fair Housing Data and Mapping Tool

As the rental market has become more competitive, low income renters find it increasingly challenging to find market rate units. Those renters with any type of perceived challenge— income from a variety of sources, a past eviction, a minor criminal infraction, a need for a reasonable accommodation—are often passed over for renters who are perceived as easier tenants. In some cases, these criteria can disproportionately affect certain protected classes; some of these effects are evident in the resident survey.

Recent experience seeking housing. Overall, 53 percent of survey respondents seriously looked for housing to rent or buy in Adams County in the past five years, where “serious” looking includes touring homes or apartments, putting in applications or applying for mortgage financing. These respondents identified issues they experienced when seeking housing to rent or buy.

Residents who reported differential treatment while seeking housing included:

- Hispanic and African American respondents, respondents with large families, and respondents whose household includes a member with a disability are more likely to have calls to landlords go unreturned or to be told the housing was no longer available once the respondent arrived in person.
- This is also true for residents who are precariously housed, have household incomes less than \$50,000, have a housing subsidy, or are currently renters. They are also more likely to be told that a unit was available over the phone and then be told the unit was no longer available after visiting in person.
- Adams County residents who believe they have experienced discrimination when looking for housing are most likely to be African American, have a housing subsidy, have household incomes less than \$25,000, and be precariously housed.

Housing voucher holders. Maiker Housing Partners manages 1,505 housing vouchers throughout the county. Most vouchers are tenant-based. White, Asian, and non-Hispanic households are underrepresented in voucher use relative to their shares of low income residents in the county. Conversely, minority households are overrepresented in voucher programs:

- African American households by 14 percentage points,
- Hispanic households by 11 percentage points, and
- American Indian households by one percentage points.

Figure V-17.
Share of Voucher
Holders by Race and
Ethnicity

Note:
 Vouchers by race and ethnicity do not add to total vouchers due to data disclosure.

Source:
 Maiker Housing Partners, 2018 ACS 5-year estimates.

| Jurisdiction | Number of Vouchers | % of County | |
|-------------------------|--------------------|---------------|-----------------------------------|
| | | % of vouchers | % of population earning <\$25,000 |
| Total Vouchers | 1,505 | 100% | 100% |
| White | 1,120 | 74% | 74% |
| African American | 269 | 18% | 4% |
| Asian | 18 | 1% | 4% |
| American Indian | 42 | 3% | 2% |
| Pacific Islander | 3 | 0% | 0% |
| Other | 16 | 1% | 8% |
| Hispanic | 759 | 50% | 39% |
| Not Hispanic | 709 | 47% | 61% |

The overrepresentation of minority households in voucher programs is due to a variety of factors at play in Adams County. As discussed above, minority households experience higher incidences of discrimination and difficulty finding housing on the open market. Also, White and Asian households generally have higher incomes affording them more housing options.

Waitlist. With the acknowledgement that waiting lists do not reflect the total scale of community needs, there are nearly 5,000 households on the waitlist for Housing Choice Vouchers with Maiker Housing Partners. Half of the households are White; 38 percent are Hispanic; and 31 percent are Black. Black households are significantly overrepresented in the waitlists for Housing Choice Vouchers, representing 38 percent of households on waitlist compared to just 4 percent of households earning less than \$25,000 in the county overall.

Similarly, one in four residents on the waitlist have a disability, compared to 11 percent living in the county with a disability. The overrepresentation of residents with a disability on the waitlist indicates a lack of accessible, privately-provided units that are affordable.

Difficulty using vouchers. A total of 94 survey respondents (6%) receive some form of housing subsidy, and 25 participate in either the Housing Choice Voucher/Section 8 program or another voucher program. Of those with vouchers, more than half report that it is “very difficult” to find a landlord that accepts a housing voucher. When asked what made it difficult to find a landlord, the most common responses include:

- Not enough properties available (15 of 25);
- Have a hard time finding information about landlords that accept Section 8 (10 of 25);

- Landlords have policies of not renting to voucher holders (9 of 25); and
- Voucher is not enough to cover the rent for places I want to live (9 of 25).

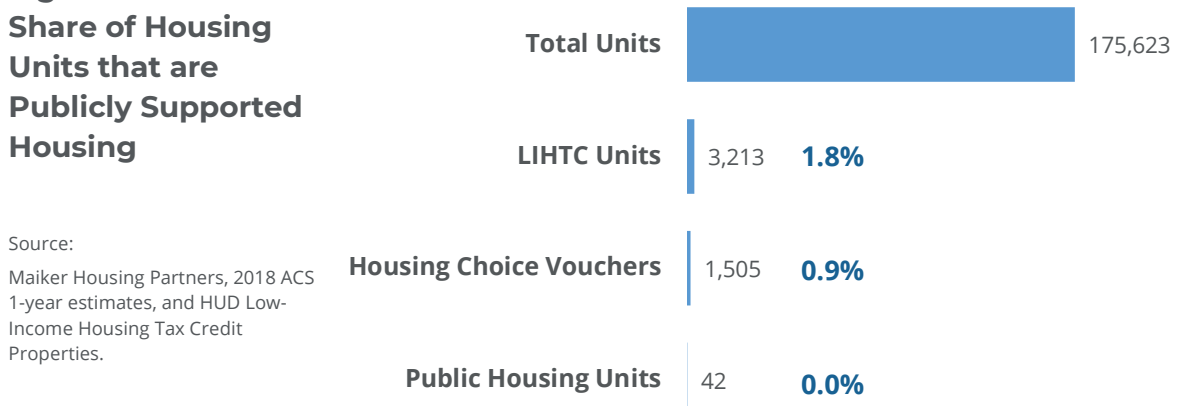
Respondent descriptions include:

- *“I couldn't afford to be picky. This was the only place I could find which would take my voucher that had anything available.” (Resident survey respondent)*
- *“Places that used to accept Section 8, no longer do, so the list is slimmer and slimmer.” (Resident survey respondent)*
- *“The neighborhoods that the vouchers are available are not good neighborhoods. We have shootings nightly and my daughter was even almost shot in the summer while playing outside at 4 pm.” (Resident survey respondent)*

Stakeholders shared many of the same concerns about landlords and added that residents face other obstacles getting housed including a criminal history, evictions on their record, bad credit, and application fees and deposits required to move into a unit.

Publicly subsidized housing. Publicly supported housing makes up approximately three percent of the overall housing inventory in Adams County, as shown in Figure V-18 below. According to the HUD LIHTC database, there are approximately 3,200 low income units in LIHTC projects.

Figure V-18.
Share of Housing Units that are Publicly Supported Housing



Source:
Maiker Housing Partners, 2018 ACS 1-year estimates, and HUD Low-Income Housing Tax Credit Properties.

Maiker Housing Partners is the largest affordable housing provider in Adams County, administering 1,505 housing vouchers and owning and operating 42 units of public housing.. In addition to Housing Choice Vouchers, Maiker currently owns and manages nine other multifamily properties across the county and manages another six properties through partnerships, for a total of 15 properties in Adams County with more than 1,600 total units.

Of the units owned and managed by Maiker, approximately 190 units are designated for seniors and residents with a disability; however, more than 350 units (22%) are occupied with a household with at least one person over the age of 62 and more than 100 units (6%) are occupied by a person with a disability. Hispanic residents occupy 45 percent of units, residents who identify as multiracial occupy 34 percent of units, non-Hispanic White residents occupy 17 percent of units, and African American residents occupy 5 percent of units.

Public Housing Authority Policy Review

Maiker Housing Partners (Maiker) is the largest affordable housing provider in Adams County. Their mission is, “to disrupt generational poverty through socially conscious community development in Adams County.” Maiker manages 1,505 housing vouchers throughout the county. Most vouchers are tenant-based. Maiker currently owns and manages nine properties across the county and manages another six properties through partnerships for a total of 15 properties in Adams County with more than 1,600 total units.

Maiker Housing Partners values the input of its residents. The Resident Advisory Board, made up of residents of Maiker properties, meets quarterly to discuss Maiker’s priorities and property improvements. Maiker’s Board of Commissioners includes a seat for an Adams County resident of low income housing; currently this seat is held by a resident of an Maiker property. Annually, Maiker surveys all residents of its properties to get feedback across a wide array of topics pertaining to resident housing. Additionally, during the planning stage of any future developments, Maiker elicits input from residents of its existing properties and area residents for design and programming.

Policy and practices review. The review of the Public Housing Authority (PHA) policies and practices was guided by HUD’s Fair Housing Planning Guide, Chapter 4, Section 4.3 and Chapter 5, Sections 5.2 and 5.4.

The results of the review are found below, which presents where potential fair housing barriers exist based on the findings from the policy analysis and program review. The review focused how Maiker could achieve the most inclusive tenancy patterns, while respecting tenant preferences for location and unit type, and balancing needs with available resources.

1. Complying with Key Federal Regulations.

What is the PHA’s policy for accommodating the needs of women who have experienced violence (Violence Against Women Act)?

What are the PHA’s policies for considering and making reasonable accommodations? Does it balance the need for adequate information with resident rights to privacy?

Maiker’s Tenant Selection plan includes a chapter on the Violence Against Women Act (VAWA) that provides protections for victims and discretionary approval to provide benefits based solely on an individual based solely on the individual’s statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b). The Tenant Selection plan contains general VAWA requirements and Maiker’s policies in three areas: notification, documentation, and confidentiality, as well as Maiker’s Emergency Transfer Plan required under VAWA 2013.

Maiker Housing Partners provides HUD regulations and related PHA policies in their Administrative Plan and Tenant Selection Plan. Policies related to persons with disabilities are found in the Fair Housing and Equal Opportunity chapter of the Administrative Plan (Chapter 2). According to the plan, rules and policies for persons with disabilities are based on, “the Fair Housing Act (42,U.S.C.) and section 504 of the Rehabilitation Act of 1973, and incorporate guidance from the Joint Statement of The Department of Housing and Urban Development and the Department of Justice (DOJ), issued May 17, 2004.”

2. Evaluating Criminal Histories

What is the PHA's policy on considering tenants with criminal histories? [HUD has no formal policy on the length of look back periods, but recommends 5-7 years]

Maiker is actively implementing its criminal screening standards reform project and refined its screening process in 2019. Currently, Maiker is in contact with researchers in pursuit of researching and analyzing their current practices.

Maiker Housing Partners denies applicants with a household member that has engaged in any of the following criminal activities in the past five years:

- *Drug-related criminal activity*, defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug
- *Violent criminal activity*, defined by HUD as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage.
- Criminal activity that may threaten the health, safety, or welfare of other tenants
- Criminal activity that may threaten the health or safety of O/A staff, contractors, subcontractors, or agents.
- Criminal sexual conduct, including but not limited to sexual assault, incest, open and gross lewdness, or child abuse.

The Tenant Selection Plan provides provisions for the consideration of circumstances stating, “While a record of arrests will not be used as the basis for denial, an arrest may, however, trigger an investigation to determine whether the applicant actually engaged in disqualifying criminal activity.”

3. Offering Mobility Counseling

Maiker Housing Partners acts as an advocacy agency, embracing their role as an anchor institution towards the vision of a thriving and equitable Adams County. In 2018, Maiker reimaged its Resident Services program to the Family and Community Vitality program. This program serves two primary functions which include community organizing and community resource navigation. This department is built on a community organizing model, where members create the change they want to see with the support of our team of community organizers and resource navigators.

Maiker's advocacy role is outlined on their website as follows:

- "We advocate for changes to streamline the permitting process for new affordable housing developments.
- We take a progressive stance on changes to resident screening standards that will reduce barriers for those with the greatest need.
- We work to end the cycle of generational poverty by combining access to affordable housing with programs designed to help individuals and families establish stability and work toward economic independence.
- We partner with the private sector and other stakeholders to identify new solutions.
- We work in partnership with the community to invest in opportunities that will increase housing affordability and positively transform neighborhoods."

4. Promoting Inclusive Tenancy

Does the PHA exhibit patterns of concentrations within developments?

Occupancy data provided by the housing authority show variation among resident race and ethnicity by development in some cases; however, overall dispersion is consistent across developments.

5. Accommodating Regional Needs

How well do household compositions and wait lists reflect the needs of the broader region?

Residents and voucher holders are more racially and ethnically diverse than the region overall.

6. Preferences and Tenant Selection Policies

What types of preferences exist and do these reflect needs?

Are there any concerns with the Tenant Selection and Assignment Plan (TSAP)?

Do the preferences limit or discourage applicants from residing in all areas of the region?

No preferences are given for applicants on the waitlist. Applicants are selected solely on the date and time of their application. However, extremely low income families may be selected ahead of other eligible families on an as-needed basis to ensure that the income targeting requirement is met.

7. Accommodating Needs in Applications

How well does the process for applying for public housing or Housing Choice Vouchers (HCV) accommodate the needs of Limited English Populations, residents with special needs, and residents with disabilities?

Maiker provides alternative arrangements for applicants who are visually impaired or have limited English proficiency. Individuals who are unable to apply in person may make alternative arrangements. The Tenant Selection Plan explicitly states:

“The O/A must take a variety of steps to ensure that the application process is accessible to those people who might have difficulty complying with the standard O/A application process.

The O/A must provide reasonable accommodation as needed for persons with disabilities to make the application process fully accessible. The facility where applications are accepted and the application process must be fully accessible, or the O/A must provide an alternate approach that provides equal access to the program.”

Maiker’s Administrative Plan provides additional detail on program accessibility stating the following alternative forms of communication that are available: TTD/TTY, sign language interpretation, having material explained orally by staff, or having a third party to receive, interpret, and explain materials.

8. Accommodating the Needs of Residents with Disabilities

How are accessible units made available?

Does the PHA promote the availability of accessible housing units to voucher holders?

How are residents with mental illness and behavioral and cognitive challenges accommodated?

The needs of public housing tenants and applicants for accessible units varies greatly by the type of disability a person lives with. Some tenants and applicants with disabilities require physical accommodations to units, reasonable accommodation for the application process or for ongoing housing needs, or two-bedroom units to accommodate a live-in caretaker. Maiker Housing Partners also provides a list of

properties with handicap accessible units in their informational packet to all new applicantes as well as any participants who request this information.

Maiker also provides transfers to make an accessible unit available for a resident with a disability. When a non-accessible unit becomes available Maiker may transfer a family living in an accessible unit that does not require accessible features to the vacated unit.

SECTION VI.

FAIR HOUSING ENVIRONMENT

SECTION VI.

Fair Housing Environment

This section of the Adams County AI assesses private and public barriers to housing choice within the context of existing fair housing laws, regulations, and guidance. This analysis is informed by fair housing complaints; legal cases; a review of relevant land use/public policies and practices; and Adams County's current fair housing activities, including Community Development Block Grant (CDBG) investments.

Primary Findings and Recommendations

- According to the community survey conducted for this AI, African American headed households and households using a housing subsidy (e.g., a Housing Choice Voucher holder) were the most likely to believe they had experienced housing discrimination when looking for housing in the county in the past 5 years.
- HUD reported 62 fair housing complaints in Adams County between 2014 and 2018. Most complaints submitted to HUD during this period affected individuals with physical disabilities.
- The regulatory review of Adams County's zoning and land use policies found areas where the code could be clarified or strengthened to avoid fair housing challenges. The areas we recommend for priority action include:
 - Revise the definition of family used in the Adams County development standards to acknowledge two person households and to eliminate the restriction of college students from cohabitating. Occupancy regulations for health and safety should be used as a more inclusive approach to limit the number of unrelated persons (including students) cohabitating.
 - Remove distinctions between group homes for protected classes (e.g., developmentally disabled and seniors) in the Adams County development standards and regulations. Isolating these groups and requiring a discretionary review process for their approval is considered differential treatment. Most communities regulate group homes based on occupancy limits and level of care—not individual occupant characteristics.
 - Eliminate the discretionary review process in Adams County for group homes that serve protected classes (serving six or fewer persons). Conditional use permits which require public hearings and notice requirements may increase public awareness and increase "NIMBY-ism" (not

in backyard syndrome) for group homes for persons who are developmentally disabled and/or seniors.

- Include group homes as a permitted use in the Adams County Transit Oriented Development Overlay mixed use district. Persons living in group environments often have lower car use and would benefit from living in close proximity to transit.
 - Remove exclusionary language in the code—specifically, in the stated purpose for residential districts as indicated on page 24 of this section.
- Best practices that are not as critical in nature but would be beneficial during the update of the code or in text amendments include:
 - Include a definition of “disability” or “person with disabilities” that aligns with Fair Housing Amendments Act (FHAA) and Americans with Disabilities Act (ADA) in the development code. In defining disability, it is important to include the broad definition that has been interpreted by the courts to apply to the Fair Housing Act (FHA), which includes persons in recovery from substance abuse challenges and persons with HIV/AIDS.
 - Establish a standard process for reasonable accommodation requests in the development code.
 - Consider designating mixed-use districts as base zone districts, as opposed to overlays, to minimize procedural delays and public hearings.
 - Implement residential unit classifications, zone districts, and site design requirements for alternative housing types (e.g. tiny homes, cottage housing, courtyard development, micro-homes, and cooperative housing).
 - Include a statement in the purpose of the zoning ordinance that discusses fair housing law or include a cross-reference that identifies the adopted planning documents that discuss and contain policies related to fair housing.

Legal Framework

Fair housing rights and protections are governed by the federal and state fair housing acts.

Federal Fair Housing Act. The Federal Fair Housing Act, passed in 1968 and amended in 1988, prohibits discrimination in housing on the basis of race, color, national origin, religion, gender/sex, familial status and disability. The Fair Housing Act—Amended (FHAA) covers most types of housing including rental housing, home sales, mortgage and home improvement lending and land use and zoning. Excluded from the FHAA are owner-occupied buildings with no more than four units, single family housing units sold or rented

without the use of a real estate agent or broker, housing operated by organizations and private clubs that limit occupancy to members and housing for older persons.¹

HUD has the primary authority for enforcing the FHAA. HUD investigates the complaints it receives and determines if there is a “reasonable cause” to believe that discrimination occurred. If reasonable cause is established, HUD brings the complaint before an Administrative Law Judge. Parties to the action can also elect to have the trial held in a federal court (in which case the Department of Justice brings the claim on behalf of the plaintiff).²

State ordinance. The State of Colorado has a state law that prohibits housing discrimination (Colorado Revised Statutes, Title 24, Article 34, Part 5 – Housing Practices).³ The state law includes additional protected classes’ marital status, creed, ancestry and sexual orientation (including Transgender Status). The Colorado Civil Rights Division (CCRD) enforces the state’s fair housing law. The CCRD:

- “Investigates complaints of discrimination, attempting early resolution, including settlement negotiations, and issues determinations as to whether there is probable cause to believe that illegal discrimination has occurred;
- Provides expert training and information on laws and issues regarding civil rights; and
- Intervenes and helps resolve intergroup, culturally based tensions.”⁴

The Division maintains formal work-sharing agreements with HUD and, through this relationship, has the authority to investigate and resolve housing discrimination complaints. CCRD has exclusive jurisdiction in situations in which Federal antidiscrimination laws do not apply—e.g., in enforcing cases involving marital status as a basis for housing discrimination and in certain cases of discrimination related to lack of public accommodations and discriminatory advertising.

¹ “How Much Do We Know? Public Awareness of the Nation’s Fair Housing Laws”, The U.S. Department of Housing and Urban Development, Office of Policy and Research, April 2002.

² *Ibid.*

³ See <http://www.dora.state.co.us/civil-rights/lawsandregulations.htm> for the actual text of the law.

⁴ CCRD website at <http://www.dora.state.co.us/civil-rights/aboutthedivision.htm>

Course of Action

The Adams County Community and Economic Development Department provides a webpage on Fair Housing Laws. This webpage, pictured below in Figure VI-1, provides resources for victims of discrimination, links to informational resources on Fair Housing, and a link to a public service announcement that provides information of the FHAA.

Figure VI-1.
Adams County Fair Housing Laws Webpage



Federal Fair Housing Act

Title VIII of the Civil Rights Act of 1968, with the Fair Housing Amendments Act of 1988, is called the Fair Housing Act. The Fair Housing Act prohibits discrimination based on race, color, religion, national origin, sex, handicap and familial status (including children under the age of 18 living with parents or legal custodians, pregnant women and people securing custody of children under 18). The Act deals with the sale, rental or financing of housing, as well as any advertisements or statements with respect to housing. The U. S. Department of Housing and Urban Development (HUD) is the federal agency that administers and enforces the Act. Watch the [fair housing video](#) or the [public service announcement video](#) to learn how a

person is protected under the Fair Housing Act.

More information on the Federal Fair Housing Act and available resources can be found on the [HUD website](#) under Fair Housing.

Fair Housing in Colorado

For information about the Fair Housing Act, the Colorado Anti-Discrimination Act, prohibited housing practices, prohibited lending practices, and more, download our summary of [Fair Housing Laws in Colorado](#).

Where to go for Help

If you believe that you are the victim of housing discrimination, you may contact one of the agencies listed below to file a complaint. These agencies will investigate your complaint and take the appropriate action. A complaint must be filed with the appropriate agency within one year of the alleged act of discrimination.

Denver Metro Fair Housing Center

The Denver Metro Fair Housing Center provides information and assistance to individuals who may have experienced or have questions about housing discrimination. For information about discrimination or fair housing law, or for assistance in filing a complaint, you can visit their website or call them at 720.279.4291 to speak to a housing specialist.

Colorado Civil Rights Division

You may file a discrimination complaint directly with the State of Colorado Department of Regulatory Agencies, Division of Civil Rights. Under a Memorandum of Understanding between the Colorado Civil Rights Division and HUD, the Division accepts and investigates a complaint jointly filed under both Colorado and federal law. For information about the Colorado Civil Rights Division you can visit their [website](#), available in both English and Spanish. You may also contact them directly at 303.894.2997 for English or Spanish, or for hearing impaired by dialing 711.

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

HUD is the federal agency responsible for administering the Fair Housing Act. Within HUD, the Office of Fair Housing and Equal Opportunity is the office that receives complaints. To file a complaint, contact the Denver HUD Fair Housing office at 1.800.877.7353 or HUD's Discrimination Hotline at 1.800.669.9777. You can also download the discrimination complaint form and instructions by accessing [HUD's website](#). HUD will investigate the complaint at no charge to you. If you are hearing or speech impaired, you can reach the HUD Fair Housing office through the TTY service at 1.800.927.9275.

- [Civil Rights](#)
- [HUD Fair Housing](#)

Source: <http://www.adcogov.org/fair-housing-laws>

Citizens of Adams County who believe they have experienced discrimination in violation of the Federal Fair Housing Act (FHA) or state fair housing laws may report their complaints to the following entities as referenced on their webpage:

- Denver Metro Fair Housing Center;
- Colorado Civil Rights Division; and
- U. S. Department of Housing and Urban Development (HUD).

Other entities not identified on Adams County's Fair Housing Laws webpage that are responsible for receiving and investigating complaints of fair housing discrimination in Colorado include:

- The Colorado Division of Real Estate (certain transactions);
- The Colorado Cross-Disability Coalition (CCDC), as qualified;
- Colorado Legal Services; and
- The Legal Center for Persons with Disabilities and Older People.

Victims have one year from the date of the alleged discrimination to file a complaint. The following section discusses the investigation process by the various complaint-taking organizations.

Department of Housing and Urban Development (HUD). Housing discrimination complaints filed with HUD may be done online⁵; by calling toll free at 1-800-669-9777; or by contacting the Office of Fair Housing and Equal Opportunity in Washington D.C., or the HUD Denver Regional Office of Fair Housing and Equal Opportunity.

When HUD receives a complaint, HUD will notify the person who filed the complaint and will normally notify the alleged violator and allow that person to submit a response. The complaint will be investigated to determine whether there has been a violation of the Fair Housing Act.

A complaint may be resolved in a number of ways. First, HUD will try to reach an agreement between the two parties involved. A conciliation agreement must protect the filer of the complaint and public interest. If an agreement is signed, HUD will take no further action unless the agreement has been breached. HUD will then recommend that the Attorney General file suit.

If HUD has determined that a state or local agency has the same housing powers ("substantial equivalency") as HUD, they will refer the complaint to that agency and will notify the complainant of the referral. CCRD is a substantially equivalent local agency (see

⁵ <http://www.hud.gov/complaints/housediscrim.cfm>.

the CCRD process in the following section). CCRD must begin work on the complaint within 30 days or HUD may take it back.

If during the investigative review and legal processes, CCRD or HUD finds that discrimination has occurred, the case will be heard in an administrative hearing within 120 days, unless either party prefers the case to be heard in Federal district court.

If a person needs immediate help to stop a serious problem that is being caused by a Fair Housing Act violation, HUD may be able to assist as soon as a complaint is filed. HUD may authorize the Attorney General to go to court to seek temporary or preliminary relief, pending the outcome of the complaint, if irreparable harm is likely to occur without HUD's intervention and there is substantial evidence that a violation of the Fair Housing Act occurred.

Colorado Division of Civil Rights (CCRD). The Colorado Civil Rights Division is charged with enforcing the state's anti-discrimination laws in the areas of employment, housing and public accommodation.

Alleged victims must first complete a housing discrimination intake packet. The packet is available online through the CaseConnect interface⁶ or may be requested by calling the local number 303-894-2997, the toll free number 800-262-4845, TTD-relay services, the Spanish hotline 720-432-4294, the following email DORA_CCRDIntake@state.co.us, or in person at CCRD's office.

Once CCRD receives a fully completed intake packet, the housing intake staff will draft a charge of discrimination, which must be signed by the complainant. After CCRD receives a fully executed charge of discrimination, a copy is served promptly on the respondent and the investigative process is initiated. As part of the investigation, the respondent is asked to provide a written response to the allegation(s) within 10 days in housing cases. The person filing the complaint will be provided with a copy of the respondent's position statement and will be afforded an opportunity to submit a rebuttal.

The case is assigned to a housing investigator. The investigator will analyze all information related to the case and may request information as needed. After the investigation is complete, the investigator writes a summary report and Letter of Determination. The Division has up to 270 days to investigate a claim, as well as two potential extensions of 90 days each.

The Letter of Determination states the facts of the case and provides an analysis of the case. If the preponderance of the evidence supports the allegation of discrimination, a finding of Probable Cause is issued. Conversely, if the evidence does not support the claim,

⁶ <https://www.colorado.gov/pacific/dora/civil-rights/housing-discrimination>

a finding of No Probable Cause is issued. Along with the dismissal of the claim, the person filing the complaint is issued a notice of Right to Sue. A Right to Sue Notice allows the person to proceed in court, if desired.

In a No Probable Cause finding, the complainant has the opportunity to appeal that decision to CCRD.

If a finding of Probable Cause is issued, Colorado law mandates that a conciliation conference be held. A conciliator is assigned to work with both parties to try to resolve the complaint. If successful, a formal agreement with the specifics of the settlement is drafted by the mediator and signed by both parties. If the parties do not reach a settlement agreement during conciliation, the case will proceed to the Civil Rights Commission to determine if it will be set for a hearing before an administrative law judge with the involvement of the Colorado Attorney General's Office.

In addition to investigative activities, CCRD staff have written educational curriculum on housing discrimination for licensed real estate agents. The staff also assists or provides training materials to relevant entities, such as human relation commissions, apartment associations and/or law firms.

Colorado Division of Real Estate. The Colorado Division of Real Estate takes complaints against real estate brokers, appraisers and/or mortgage brokers. Complaints can be filed online⁷ or complaint packets may be requested by calling the Division at 303-894-2166 or 303 894-2185. The Commission receives an average of 1,000 written complaints per year against brokers, salespersons, subdivision developers and appraisers. Approximately 15 percent of those result in some form of disciplinary action.

When a written complaint is received, it is reviewed and assigned to an investigator. The investigator analyzes the complaint, response and pertinent documents to determine possible license law violations. It is the Division's goal to complete investigations within 240 days, but some complaints take longer due to complexity, availability of witnesses, and the Division's workload.

Upon completion of the investigation, the investigator prepares a written report concerning the facts that have been obtained. At that time the complaint may be dismissed on the basis of insufficient evidence of a license law violation or for lack of jurisdiction. If the facts obtained appear to indicate a violation of license law, the report is submitted to the appropriate Board or Commission for consideration. If the Board/Commission orders discipline, the case is referred to the Expedited Settlement Program—located in the Division of Real Estate—for settlement or the Office of the Attorney General for litigation.

⁷ www.dora.state.co.us/real-estate/Complaints/Complaints

After the Board has issued its order in the matter, the licensee may appeal the case to the Court of Appeals and, in some instances, appeal again to a higher court.

Colorado Cross-Disability Coalition (CCDC). The Colorado Cross-Disability Coalition, or CCDC, is dedicated to ensuring the independence, self-reliance and full participation of people with all types of disabilities in Colorado. CCDC can be contacted online⁸ or the Advocacy Program department can be reached by phone at 303-839-1775. The CCDC Legal Program brings lawsuits on behalf of CCDC and its members to enforce the Americans with Disabilities Act (ADA) and other statutes that protect the civil rights of persons with disabilities.

Disability Law Colorado (Legal Services). Disability Law Colorado (formerly known as The Legal Center for People with Disabilities and Older People) is an independent, public interest nonprofit organization, specializing in civil rights and discrimination issues. In addition to various other types of cases, the organizations assist qualifying households with fair housing issues. Their services depend on the potential case, but range from advice from an attorney to legal assistance and representation in court. You may contact Legal Services by either going online (disabilitylawco.org/we-may-be-able-help-you) or by phoning them at 800-288-1376.

Each organization has established priorities for their cases, which determines the types of cases that are investigated if there is a need to prioritize. The Legal Center prioritizes its fair housing advocacy work to assist Coloradans with disabilities in obtaining affordable, accessible housing. The organization assists people with disabilities that are in jeopardy of losing their housing for reasons related to disability and accessibility, in addition to advocating for the provision of legally required accommodations.

Denver Metro Fair Housing Center (DMFHC). The Denver Metro Fair Housing Center, or DMFHC, is a nonprofit organization that works to eliminate housing discrimination. They focus on the promotion of housing choice for all people through education, advocacy and enforcement of fair housing law. The DMFHC periodically conducts investigations to measure the nature and extent of rental housing discrimination due to race, national origin and the presence of children in the home.

⁸ <http://www.ccdconline.org>.

Housing Discrimination, Complaints, and Legal Cases

This section provides an overview of residents' perceptions of discriminatory behavior from responses to the community survey conducted for this AI and a review of FHAA related complaints and legal cases filed in the county since 2014.

Overall, African American headed households and households using a housing subsidy (e.g., a Housing Choice Voucher holder) were the most likely to believe they had experienced housing discrimination, according to the resident survey, and households with a person living with a physical disability filed the most complaints during the reporting period. The total number of complaints filed between 2014 and 2018 increased by 15 complaints from the previous five-year period for a total of 62 fair housing complaints from 2014 to 2018.

Experience with housing discrimination. About one in 10 survey respondents believe they experienced discrimination when they looked for housing in Adams County, according to the resident survey. Actual complaint data are much lower—indicating that many households who feel they have experienced discrimination do not file complaints.

The resident survey found that:

- African American respondents, respondents with a housing subsidy, those with household incomes less than \$25,000, and precariously housed residents are twice as likely as Adams County respondents overall to feel they had experienced housing discrimination.
- Seniors, homeowners, and the higher income households were least likely to believe they had experienced housing discrimination in the past.

Nearly 75 percent who think they experienced housing discrimination when looking for housing in Adams County say that the incident took place in the past five years, and 37 percent said that it occurred in 2019.

Reasons for discrimination. Respondents described the reasons they think they experienced discrimination when looking for housing to rent or buy Adams County. These include:

- Race/ethnicity (35%);
- Age (25%);
- Income (24%);
- Familial status/having children (20%);
- Looks/appearance (12%);
- Disability (11%);
- Past eviction or foreclosure (11%);
- Criminal history (9%);
- National origin (7%);
- Language spoken (6%);

- Homeless (4%);
- Sex or gender identity (3%);
- Sexual orientation (3%);
- Section 8/voucher program participant (2%); and
- None of the participants attributed their discrimination experience to religion.

Examples of how participants described why they thought they were discriminated against include:

- *“Felt because I was Mexican, they treated me like I was illegal.” (Resident survey respondent)*
- *“I feel more like it’s the color of my skin.” (Resident survey respondent)*
- *“I would call and the landlord said they had units. When they saw my husband was Black they would play dumb.” (Resident survey respondent)*
- *“Landlord was concerned about me having children.” (Resident survey respondent)*
- *“Me dejaron una nota en Mi puerta diciendo que somos ilegales.” [They left a note on my door saying that we are illegal.] (Resident survey respondent)*
- *“Income and my request for a therapy dog for my child.” (Resident survey respondent)*
- *“Just always getting judged for my tattoos and being incarcerated.” (Resident survey respondent)*
- *“Socioeconomic discrimination. Service animal not accepted.” (Resident survey respondent)*
- *“We looked at rental, apartment complexes before deciding to try to purchase. There were barely any Accessible apartments available and those that were—the 1st floor apartments—were charged at a considerably higher rate than 2nd or 3rd floor apartments. Was told it was because more people wanted 1st floor. Baloney...And what older complexes labeled an Accessible apartment was a joke. Bedroom/closet/pantry doors wouldn’t be wide enough, there would be stairs outside and inside, bathrooms would not have grab bars or big enough for a wheelchair or wide enough doors. There would not be an Accessible path from Apartment to mailboxes or main office or laundry. Did not feel that complexes wanted individuals in wheelchairs living there. Newer or older complexes.” (Resident survey respondent)*

Response to discrimination. When asked what they did about the discrimination, the most common responses include:

- **“Nothing—I wasn’t sure what to do”** (79%);
- “Moved/found another place to live” (9%);
- “Nothing—I was afraid of being evicted/harassed. (7%);
- “Called/emailed a lawyer/Legal Aid/ACLU” (6%); and
- “Called/emailed housing authority” (4%).

Fair housing complaints. HUD, working with the Colorado Civil Rights Division (CCRD), receives and investigates housing complaints. HUD provided data on intakes between 2014 and 2018 for this study; HUD reported 62 fair housing complaints in Adams County during this period.

Figure VI-2 provides a historical summary of HUD complaints from 2009 to 2019, including complaints from the previous AI (2009 to 2014) and the most recent 5-year period (2014-2018). Physical disability is the most common protected class affected. Most complaints were closed without further action taking place, as most were closed with no cause determination.

Figure VI-2.
Summary of HUD Complaints, 2009-2018

| Year | Number of Complaints | Most Common Protected Class Affected | Most Common Resolution |
|------|----------------------|--------------------------------------|---|
| 2009 | 11 | Race | No Cause Determination |
| 2010 | 8 | Physical Disability | No Cause Determination |
| 2011 | 6 | Physical Disability | No Cause Determination |
| 2012 | 10 | Physical Disability | No Cause Determination |
| 2013 | 12 | Physical Disability | Complaint Withdrawn by Complainant After Resolution |
| 2014 | 13 | Physical Disability | No Cause Determination |
| 2015 | 8 | Physical Disability | No Cause Determination |
| 2016 | 11 | Race | No Cause Determination |
| 2017 | 16 | Physical Disability | No Cause Determination |
| 2018 | 14 | Physical Disability | No Cause Determination |

Source: HUD

Figure VI-3 shows the number of complaints by protected class affected from 2014 to 2018. The most common protected classes affected are physical disability (24 complaints) and mental (18) disabilities followed by race (14). Two cases during the five year period affected religion and eight complaints involved sex discrimination.

Figure VI-4 shows the number of complaints by resolution. Most complaint resolutions were through no cause determination (40 complaints) followed by complaint withdrawn by complainant after resolution (10), and successful conciliation or settlement (6).

Figure VI-3.
Count of Protected Classes in all Complaints, 2014-2018

Note:
Complaints can have more than one protected class.

Source:
HUD

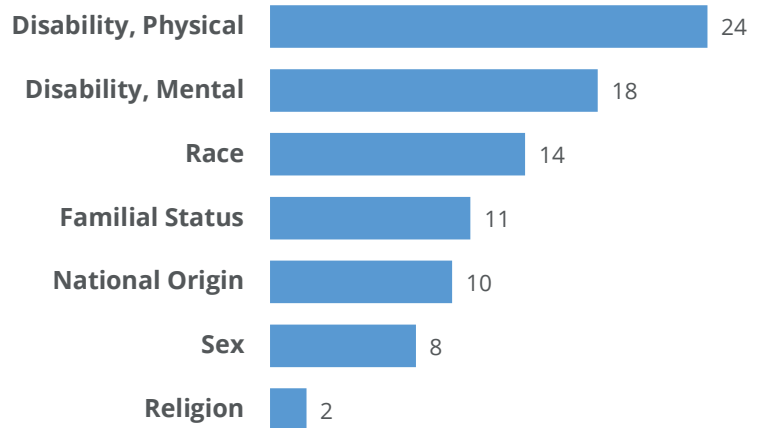
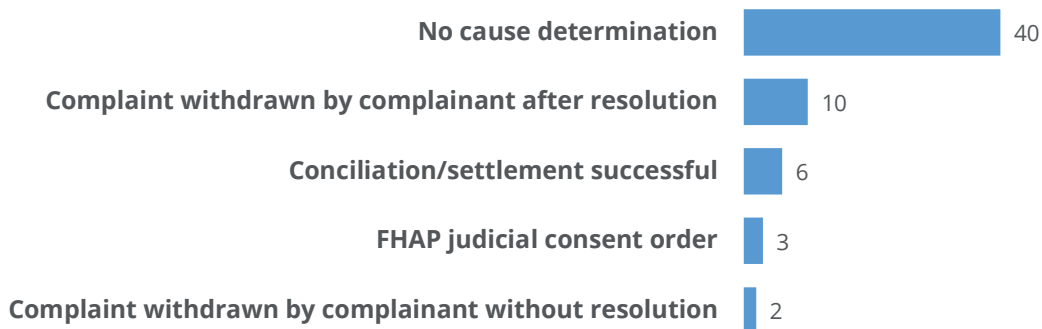


Figure VI-4.
Count of Resolution of Complaints, 2014- 2018



Source: HUD

Legal cases. To support the complaint analysis, we searched U.S. Department of Justice for housing and civil enforcement section cases in Adams County. None were identified at the time of this report.

Land Use, Public Policies, and Practices

The Federal Fair Housing Act's requirement to affirmatively further fair housing includes avoiding policies and/or practices that limit the fair housing choice of the individuals and households protected by the Act.

Land development codes cannot contain standards, definitions, or procedures that result in differential treatment in housing which can disproportionately affect the classes protected under the FHA. In addition, land development regulations that increase development costs, e.g., through density or design requirements that make residential development overly expensive, can limit the supply of affordable housing. In some communities, this has a direct impact on racial and ethnic minorities, larger households and families with children, and persons with disabilities because these groups are disproportionately represented among those residing in lower cost housing. Limits or prohibitions on multifamily housing or restrictions on household occupancy are other examples of how land development codes can negatively affect the groups protected under FHA.

The Americans with Disabilities Act (ADA) prohibits discrimination based on disability, defined by ADA as a physical or mental impairment. The ADA requires accessibility in public places (i.e., open to and used by the public) and also requires that “reasonable accommodations” be allowed when necessary to permit persons with disabilities equal opportunity to enjoy such places. The accessibility provision in the FHAA governs residential accessibility, and requires that multifamily buildings built after March 13, 1991 have specific accessible design features and be adaptable. In addition, the FHAA ensures that persons with disabilities have the right to request and be granted modifications to residential units—as well as local regulations and standards—to make a residence or building accessible to them.

Common regulatory barriers. Some of the key factors in land development codes that most commonly result in barriers to fair housing choice and reasonable accommodation include:

- **Site standards.** Large lots or excessive setbacks between structures or from streets that can increase development costs, e.g., special infrastructure;
- **Limits on density.** Restriction on or prohibition of multifamily housing; low floor area ratios (FAR) for multifamily or mixed-use development; or low density requirements;
- **Use-specific standards.** Special site or operational requirements for group homes for persons with disabilities that are not required for other residences or groups;
- **Differences in quality and access to public services.** Additional requirements for infrastructure or essential municipal services not required for other residences or dwelling units;

- **Definition of family and occupancy restrictions.** Definitions of family or occupancy limits that prohibit or limit the number of unrelated persons in a household;
- **Procedures for development or rezone reviews.** Extensive review procedures, public hearings, or notice requirements for different housing types, housing for protected classes, or low-income housing;
- **Housing types.** Limits or prohibitions on alternative affordable housing options such as accessory dwelling units (ADUs), modular or manufactured homes, and mixed-use developments;
- **Spacing.** Minimum distance between group homes that are not required for other residences or groups and make development of group homes difficult;
- **Reasonable accommodations.** Regulations inhibiting modifications to housing for persons with disabilities or their ability to locate in certain neighborhoods; and
- **Code language.** Local land development codes and standards that are not aligned with federal and state regulations governing fair housing and reasonable accommodation.

Findings from the 2015 Analysis of Impediments. The 2015 Analysis of Impediments to Fair Housing focused on the following public policies and actions that impact housing choice:

- Imagine Adams County (2012) the county's comprehensive plan;
- Balanced Housing Plan (2009);
- The development process and cost of development;
- Building codes;
- The definition of family;
- Neighborhood revitalization, municipal services, employment, and housing;
- Transportation linkage;
- Public housing;
- Sale of subsidized housing;
- Property tax policies; and
- Administrative policies concerning community development and housing activities.

The figure below summarizes the findings from the 2015 AI and indicates if the county addressed the barrier.

**Figure VI-5.
Public Sector Findings from the 2015 AI Update**

| Public Sector Policy | 2015 Findings | 2020 Update | Resolved? (yes/no) |
|--------------------------------------|--|---|--------------------|
| General Plan | The County Comprehensive Plan is silent on statements of support and incentives for expanding housing opportunities. | Imagine Adams County, the county's comprehensive plan was last updated in 2012. | No |
| Balanced Housing Plan | Balanced Housing Plan adopted in 2009. No major conclusions or recommendations. | Balanced Housing Plan updated in 2018. | Yes |
| Development Process and Costs | Development review process is not an impediment. Development costs are impediments to fair housing choice. | Development process and costs were not identified as an impediment to fair housing. | Yes |
| Building Codes | The building codes presently in force in all jurisdictions in Adams County are consistent with what is in place in other areas of the state. | Adams County: 2018 IBC Bennett: 2012 IBC Brighton: 2012 IBC Federal Heights: 2015 IBC Northglenn: 2009 IBC Thornton: 2015 IBC Westminster: 2015 IBC | N/A |
| Definition of Family | The jurisdictions in Adams County are permissive about allowing group homes or group living facilities. The county could improve guidelines for group home permitting. | The definition of Family in Adams County, and participating jurisdictions, is discussed in the following zoning review. | N/A |
| Neighborhood Revitalization | Adams County faces the same fiscal pressures that other municipalities face. | Fiscal constraints will become more acute with the fallout of the COVID-19 pandemic. Neighborhood revitalization has not been determined to be an impediment to fair housing. | N/A |

Figure VI-6.
Public Sector Findings from the 2015 AI Update (Continued)

| Public Sector Policy | 2015 Findings | 2020 Update | Resolved? (yes/no) |
|-----------------------------------|--|---|--------------------|
| Transportation Linkage | Future public efforts will need to focus on creating good transit linkages with both highways and bus lines that can move people throughout the County and to the DIA employment corridor. | In 2016, Adams County adopted the Southwest Adams County Making Connections Planning and Implementation Plan. The plan is organized by 10 “critical path policies and projects” that will capitalize on the existing and future regional infrastructure in partnership with neighboring jurisdictions, developers, utility agencies, and special districts. | Yes |
| Public Housing | Housing authorities in the county have plans in place to expand the supply of affordable housing within their service area. | Maiker Housing Partners is a high performing, innovative housing authority with extensive development and regulatory strategies for increasing the availability of affordable housing in Adams County. | N/A |
| Sale of Subsidized Housing | Impending sale of subsidized housing units in Adams County is not an item of concern at this time. | Impending sale of subsidized housing units in Adams County is not an item of concern at this time. | N/A |
| Property Tax Policies | Colorado property tax statutes and policies provide for some financial incentives to public and private developers wishing to broaden housing choice for very low income households. | Property tax policies were not identified as an impediment to fair housing. | N/A |
| Administrative Policies | The county provides support and effective program management for countywide efforts to expand housing choice and opportunities for low income and minority populations. | Administrative policies were not identified as an impediment to fair housing. | N/A |

Source: Community Strategies Institute and Root Policy Research

Zoning and land use review. The Adams County Development Standards and Regulations (the Code) were reviewed based on a checklist developed by the Region IX HUD office (“Review of Public Policies and Practices—Zoning and Planning Code). The checklist poses a series of questions aimed at common zoning regulations that impact fair housing. The questions in that checklist are consolidated below and used to evaluate the zoning and planning code.

1. Is there a definition of “family” and does it discriminate against group living for persons with disabilities?

Family is defined in section 11-02-202 of the Code as “An individual or three (3) or more persons related by blood, marriage, or legal adoption, living together in a dwelling unit as a single housekeeping unit. Persons not related by blood, marriage, or legal adoption shall be deemed to constitute a family where they are living and cooking together as a single housekeeping unit, but shall not include unrelated students attending colleges or universities.”

This definition does not single out persons with disabilities and would include both related and unrelated persons as long as the group meets the other parameters of the definition: related by blood, marriage, or legal adoption or an unrelated where they are living and cooking together as a single housekeeping unit, but shall not include unrelated students attending colleges or universities. The definition of family does not limit the number of unrelated people living together, but explicitly excludes unrelated students attending colleges or universities. Additionally, this definition excludes a two person household.

Best practices review. Some jurisdictions have moved away from defining “family” to avoid potential FHAA conflicts and instead rely on occupancy standards to regulate residential overcrowding. The recent “Scarborough 11” case in Hartford, Connecticut provides a strong case for removing narrow definitions of family from local codes. Though this definition does not have the explicit effect of discriminating against a group of individuals with disabilities living together, current best practices indicate a broader definition of family increases housing opportunity and flexibility for all residents by allowing more unrelated people to live together. The best practice definition of family, “does not distinguish among housekeeping units on the basis of blood, marriage, or adoptive relationship, which avoids the problem of discrimination against individuals residing in group living facilities.”⁹

Although not a protected class under the Fair Housing Act, the code explicitly discriminates against unrelated students attending colleges or universities from living together. This discriminatory clause leaves no suitable habitation for students and unrelated roommates to live together in Adams County. It is a best practice to regulate

⁹ Group Homes: Strategies for Effective and Defensible Planning and Regulation; Connolly, Brian and Merriam, Dwight.

occupancy of the unit (allowing at least 6 unrelated individuals by right) instead of the characteristics and relationships of those individuals.

2. Are there any occupancy standards or maximum occupancy limits?

No.

3. Is the number of unrelated disabled individuals residing together restricted but there is no restriction for other persons?

The Code explicitly does not permit unrelated students attending colleges or universities living together but does not limit the number of unrelated people living together generally. However, the regulations that govern Group Living Facilities specify different restrictions (e.g., requiring a conditional use permit) based on characteristics of the residents, licensing requirements, and number of occupants.

Group Living Facility is defined in Section 11-02-267 of the Code as, “A facility licensed by the Courts, Social Service Department, or other competent governmental authority for housing residents in a group home which include a group home for the aged, residential treatment center, group home for the mentally ill, home for social rehabilitation, group home for the developmentally disabled, communal home, specialized group facility, receiving home for more than four (4) foster home residents, residential child care facility, or shelter for domestic violence.”

Licensing. Most states—including Colorado—require group homes to obtain licenses.¹⁰

Isolating groups. Group Living Facilities are permitted by right in all residential districts—except the mobile home district—if they have less than five persons. However, Group Living Facilities with more than five persons, facilities for the developmentally disabled, facilities for the elderly, or facilities with more than one registered sex offender require conditional use permits in all residential districts. Requiring conditional use permits for group homes that serve seniors or individuals with developmental disabilities regardless of the number of occupants may be considered differential treatment of protected classes.

Conditional use permits. This necessitates a public notification and hearing process before two public bodies, the planning commission and the city council. Discriminatory treatment may occur if the comments of decision-makers are discriminatory in nature or the final decision is made based on opinion rather than the criteria in the zoning code. In addition, special requirements that are substantially different than those for

¹⁰ Group Homes: Strategies for Effective and Defensible Planning and Regulation; Connolly, Brian and Merriam, Dwight.

other similar residential structures (i.e., single-family) may trigger a claim of disparate treatment.

“The Planning Commission, in making their recommendation, and the Board of County Commissioners, in approving a conditional use permit, shall find:

- a) The conditional use is permitted in the applicable zone district.
- b) The conditional use is consistent with the purposes of these standards and regulations.
- c) The conditional use will comply with the requirements of these standards and regulations including, but not limited to, all applicable performance standards.
- d) The conditional use is compatible with the surrounding area, harmonious with the character of the neighborhood, not detrimental to the immediate area, not detrimental to the future development of the area, and not detrimental to the health, safety, or welfare of the inhabitants of the area and the County. In making this determination, the Planning Commission and the Board of County Commissioners shall find, at a minimum, that the conditional use will not result in excessive traffic generation, noise, vibration, dust, glare, heat, smoke, fumes, gas, odors, or inappropriate hours of operation.
- e) The conditional use permit has addressed all off-site impacts.
- f) The site is suitable for the conditional use including adequate usable space, adequate access, and absence of environmental constraints.
- g) The site plan for the proposed conditional use will provide the most convenient and functional use of the lot including the parking scheme, traffic circulation, open space, fencing, screening, landscaping, signage, and lighting.
- h) Sewer, water, storm water drainage, fire protection, police protection, and roads are to be available and adequate to serve the needs of the conditional use as designed and proposed.”

Best practices review. A best practice to minimize potential conflict with FHAA is to allow housing with support services for persons with disabilities serving six or fewer persons as a permitted use in all residential zones and in all other zone districts that permit any residential use. The facility should be reviewed under the same review procedures and requirements as for the permitted dwelling-type to be occupied by the facility. Requiring discretionary review in the form of a conditional use permit explicitly for seniors and individuals with developmental disabilities—regardless of the number of occupants—leaves the county open for litigation.

Group Homes: Strategies for Effective and Defensible Planning and Regulation states, “Local governments should be wary of employing discretionary review proceedings during the approval process for housing for people with disabilities [or seniors], primarily because of the discretionary processes’ potential to attract litigation and because of the difficulty of crafting such a process in a way that comports with the FHAA.”¹¹

4. Is “disability” defined and is the definition the same as FHAA?

Developmentally disabled is defined, but is not the same as FHAA. Developmentally Disabled is defined in section 11-02-150 of the Code as, “Persons having cerebral palsy, multiple sclerosis, mental retardation, autism, or epilepsy.”

Best practices review. Including a definition of “disability” or “person with disabilities” that aligns with FHAA and ADA is a best practice. A definition can be included in the definitions section of the zoning code. Those codes with a section detailing the process to request a reasonable accommodation could be improved by adding a definitions sub-section that consolidates key words or phrases, including “disability” or “person with disabilities” for ease of reference. Language could be added to clarify that the definitions contained in the reasonable accommodation section apply to all other sections of the zoning or land development code.

In defining disability, it is important to include the broad definition that has been interpreted by the courts to apply to the Fair Housing Act, which includes persons in recovery from substance abuse challenges and persons with HIV/AIDS. ¹²

5. Are housing opportunities for persons with disabilities restricted or mischaracterized as a “boarding or rooming house”?

No.

Group Living Facility is defined in Section 11-02-267 of the Code as, “A facility licensed by the Courts, Social Service Department, or other competent governmental authority for housing residents in a group home which include a group home for the aged, residential treatment center, group home for the mentally ill, home for social rehabilitation, group home for the developmentally disabled, communal home, specialized group facility, receiving home for more than four (4) foster home residents, residential child care facility, or shelter for domestic violence.”

Institutional Care is defined in Section 11-02-301 of the Code as, “This use category includes: convents or monasteries; nursing homes; hospitals/clinics; foster homes;

¹¹ Group Homes: Strategies for Effective and Defensible Planning and Regulation; Connolly, Brian and Merriam, Dwight.

¹² Group Homes: Strategies for Effective and Defensible Planning and Regulation; Connolly, Brian and Merriam, Dwight.

sanitariums; convalescent homes; protective living facilities; boarding/rooming houses; and sheltered care homes.”

Boarding House is defined in Section 11-02-76 of the Code as, “A structure where lodging and/or meals are offered for a fee, and where the length of residence may continue for an extended period of time, as distinguished from a motel or hotel.”

6. Does the zoning code allow housing with on-site support services for persons with disabilities?

On-site support services for persons with disabilities are not addressed in the Code.

7. Are there definitions for “special group residential housing” and if so, do the definitions align with FHAA.?

Please see the discussion under items three and five above.

8. Is there a process to allow waivers of zoning and building code regulations for reasonable accommodation for persons with disabilities?

The process for granting reasonable accommodations for persons with disabilities is not addressed in the Code.

Best practices review. A best practice is to establish a standard process for reasonable accommodation requests. Some codes identify typical requests, such as a setback waiver for wheelchair ramps, as administrative in nature when it does not exceed a certain amount. Such requests are processed the same as any other building permit. Other reasonable accommodation requests are processed with a more detailed administrative review using criteria that comply with FHAA and ADA. This clarifies how a reasonable accommodation is reviewed and removes such requests from consideration under procedures and criteria that do not fit the circumstances of the request. When the reasonable accommodation request does not qualify for administrative review, a review before an appointed body can be used. However, the same criteria for deciding the request must be used:

- Whether the person to be accommodated has a disability;
- Whether the modification requested is reasonably necessary to accommodate that disability; and
- Whether the modification would fundamentally and unreasonably alter the nature or purposes of the zoning ordinance. The burden is on the municipality to prove this would occur.

The International Building Code (IBC) allows appeal of decisions of the building official and decisions can be made based on “alternate equivalency” to meeting the IBC requirement. The building code does not tie the determination of an alternative to the physical characteristics of the property or building, making the standard appeal process available to process requests for reasonable accommodation. Examples may include

lower sink heights to accommodate a person in a wheelchair, or special positioning of grab bars to accommodate different types of disabilities.

9. Are public hearings required for exceptions to land use codes for disabled applicants but no hearing is required for all other applicants?

Please see discussion under item three above.

10. Are mixed-uses allowed and is housing for persons with disabilities and other protected classes permitted where mixed-use is allowed?

Mixed uses are permitted in the Transit-Oriented Development (TOD) and Planned Unit Development (PUD) Districts. However, group housing for people with developmental disabilities and seniors require a conditional use permit, whereas group living facilities for up to five people are permitted by right. This distinction and best practices are further discussed above under item three.

Best practices review. A best practice is to include mixed-use zone districts as base zone districts with all zoning requirements established in the zoning code. This minimizes procedural delays and public hearings associated with planned development and overlay districts. Mixed-use zone districts should allow a range of housing types as permitted uses and include group living facilities.

11. What types of residential land uses are allowed and what standards apply?

Residential Uses are defined in Section 11-02-475 in the Code as, “Residential uses include manufacture home parks, mobile home parks; single-family dwellings, attached; single-family dwellings, detached; two family dwellings; multi-family dwellings; and group homes.”

a. Is there variety in allowed single-family and multi-family residential land uses?

Yes, a range of housing types are allowed in all residential zone districts and a mix of uses are allowed in the TOD and PUD districts. The residential unit classifications specify:

- Accessory dwelling unit (ADU), defined as, “A subordinate dwelling unit added to, created within, or detached from a single-family structure with a separate entrance that provides basic requirements for living, sleeping, eating, cooking and sanitation. A single family structure with an accessory dwelling unit is not considered to be a two-family dwelling or duplex. If the ADU is adjoined to or placed atop an unoccupied structure, such as a garage or covered porch, the garage or covered porch shall not be included in the gross floor area counted towards the ADU. Storage and mechanical space, including utility rooms and closet space, associated with the ADU shall be counted towards the floor area calculation.”

- Accessory dwelling, defined as, “Living quarters provided for the sole use of persons (and their families) employed on the premises where a principal use exists. ”
- Condominium dwelling, defined as, “A building or group of buildings in which units are owned individually, and the structure, common areas and facilities are owned by all the owners.”
- Multifamily dwelling, defined as, “A dwelling containing more than two (2) dwelling units.”
- Single family dwelling (attached), defined as, “A single-family residence attached in any way to another residence.”
- Single family dwelling (detached), defined as, “A single-family residence located on a single lot, being the principal use of the lot, and not connected to any other residence.”
- Townhouse dwelling, defined as, “An attached single family dwelling in a row of at least three (3) such units in which each unit has its own front and rear access to the outside, no unit is located over another unit, and each unit is separated from any other unit by one (1) or more common fire resistant walls.”
- Two-family dwelling, defined as, “A residence designed, arranged or used exclusively by two (2) families living independently of each other in a single structure, excluding Accessory Dwelling Units.”

The PUD process may allow for alternative housing types that are an option to address affordable housing.

Best practices review. A best practice is to incorporate residential unit classifications, zone districts, and site design requirements for alternative housing types (e.g. tiny homes, cottage housing, courtyard development, micro-homes, and cooperative housing). This minimizes delay in the approval process, reduces costs, and educates zoning and building officials and the entire community about these housing types and who it will serve.

b. Do densities and development standards (lot size, height, etc.) support low- and middle-income housing options?

The County Code includes six residential zoning districts with varying densities, locations, and requirements. The code includes regulations of the permitted residential structures for each zoning category and outlines the building code regarding density, footprint, building height and setback requirements. Multifamily dwellings, including duplexes and triplexes, are restricted to the densest districts; these districts are primarily suburban in nature, reflecting the composition of land use in the county. Accessory dwelling units are permitted in all residential districts

(except for the mobile home district), which allows for gentle density as discussed below in best practices.

Best practices review. Consideration for a process to allow smaller lot sizes and dwelling unit sizes may be merited to provide additional affordable housing options for this housing type. A best practice is to allow flexibility for “gentle density” such as duplexes to triplexes, to accommodate demand for missing middle housing, promote economic integrate, and meet current preferences in housing. Some communities allow these densities if the units carry a level of affordability (e.g., 80-120% AMI to facilitate middle income ownership).

c. Are accessory dwelling units (ADU) allowed?

Yes. Accessory dwelling units are permitted in all residential districts (except for the mobile home district).

The ADU offers an alternative housing type that may permit a household to age in place, make a home affordable to a family, and increase housing options for lower-income one and two-person households.

d. Is design review required for multi-family housing or group living?

Design review is required for all development in the Transit Oriented Development zone district. Design requirements and performance standards including minimum unit size, site coverage, landscaping, parking, etc. are specified for all residential zone districts and do not appear to be especially stringent for multifamily or group living facilities.

e. Are there special site improvement standards for certain types of housing?

As stated above, there are design requirements and performance standards for all residential uses.

12. Does the zoning code describe any areas as exclusive?

Two residential zone districts are designated exclusively for single family detached housing. No other zoning districts are described as exclusive.

The Residential Estate District’s purpose in section 3-11-01 of the code reads, “The purpose of the Residential Estate District is to serve *exclusively* as a single family detached residential district for larger lots and larger homes in a spacious, open environment away from higher density uses and where agricultural uses and the keeping of livestock are substantially restricted.”

The Residential-1-C District’s purpose in section 3-13-01 of the Code reads, “The purpose of the Residential-1-C District is to serve *exclusively* as a single-family district for smaller home sites and smaller homes.”

Best practices review. While this may not be a violation of the FHAA, it is a best practice is to remove exclusionary language from the code.

13. Are there restrictions for senior housing and if so, do the restrictions comply with Federal law on housing for older persons?

See discussion in item three on group homes for seniors.

14. Is senior housing a specific land use and if so, is a special or conditional use permit required but is not required for single-family or multi-family residential uses?

Yes—group homes for seniors require a conditional use permit. See the discussion in item three on group homes.

15. Is a conditional or special use review permit required for housing for persons with disabilities but is not required for single-family or multi-family residential uses?

Yes—group homes for individuals with developmental disabilities require a conditional use permit. See the discussion in item three on group homes.

16. Are there any references to fair housing or a statement about fair housing in the zoning code?

No.

Best practices review. A best practice is to include a statement in the purpose of the zoning ordinance that discusses fair housing law or to include a cross-reference that identifies the adopted planning documents that discuss and contain policies related to fair housing.

17. Are there specific references to the accessibility requirements of FHAA or ADA in the development codes?

No.

Best practices review. It is a best practice to include references to the FHAA or ADA accessibility requirements in the code.

a. Are there minimum standards for handicap parking for multi-family housing?

Handicap parking space minimums are specified by the number of total parking spaces in the lot for all development.

b. Are there standards for accessible routes (e.g., sidewalks and access through parking lots)?

The Code states, "Handicap parking spaces shall be located as close as possible to the nearest accessible building entrance using the shortest accessible route of travel. Whenever possible, the accessible route should not cross lanes for vehicular travel."

Jurisdictional review. Stakeholders consulted in the development of this AI expressed concerns with zoning and regulatory barriers to affordable housing development in municipal codes in Adams County. Root conducted a high level review of barriers to address these concerns. The following best practices are aimed at improving local zoning regulations and policies to promote the construction of affordable housing in jurisdictions.

- **Provide flexible residential uses.** A best practice is to incorporate residential unit classifications, zone districts, and site design requirements for alternative housing types (e.g. tiny homes, cottage housing, courtyard development, micro-homes, and cooperative housing). This minimizes delay in the approval process, reduces costs, and educates zoning and building officials and the entire community about these housing types and who it will serve.
- **Expedite the process.** Expedited permitting is not available in some jurisdictions for affordable housing developments. The entitlement process is perceived by stakeholders to be onerous and lengthy in some cases and anecdotal information indicated the process takes a minimum of 18 months to navigate. Expediting the permitting process for affordable housing is common in Colorado and is considered a best practice for encouraging affordable housing construction cost effectively.
- **Waive prohibitive fees and requirements.** Impact fees—specifically water fees—are prohibitive to residential development and are not waived or reduced for affordable developments in some jurisdictions. Again, jurisdictions should consider waiving excessive requirements for affordable housing or offering a reduced fee.
- **Increase local resources for housing.** Stakeholders expressed the need for increased commitments for affordable housing in municipal and county budgets. There is a sense that current funding is reflective of past conditions in the county and do not reflect the current need for housing. Funding tied to appreciation or routinized to encourage predictability in the amount of resources available year to year are desirable outcomes. Other resources, such as land, should be considered for the development of affordable housing.

Adams County Fair Housing Activities

Adams County's new Annual Action Plan proposes that CDBG and HOME funds be used for the following affordable housing activities and housing related public service activities that will support the county's efforts to affirmatively further fair housing:

- **Preservation of Existing Housing Stock.** The Minor Home Repair (MHR) Program will serve low-to-moderate income homeowners throughout the cities of Federal Heights, Brighton, Northglenn, and unincorporated Adams County. The program will address essential home repairs to promote decent, safe and sanitary conditions as well as accessibility issues. County staff will administer the MHR program.

City of Federal Heights will utilize its remaining CDBG allocation to continue operating its Rental Inspection Program. The Rental Inspection Program promotes affordable, safe rental housing for its residents by administering a city-wide program to bring rental properties into code compliance.

- **Public Facility Improvements.** City of Brighton will utilize a portion of its CDBG allocation to improve the public restrooms at Historic City Hall to better accommodate people with disabilities. The project will result in public restrooms on the main level that meet the Americans with Disabilities Act (ADA) standards. Historic City Hall is being used as a community service facility that serves Brighton residents with a variety of programs and services including, but not limited to, economic development, job training, housing, educational programs, and other cultural services.

Adams County Public Works is proposing to use a portion of Adams County's CDBG allocation to provide safe and adequate public improvements in a low-to-moderate income neighborhood, Sherrelwood. Improvements will focus on ADA compliant sidewalks and overall safe connectivity.

- **Emergency Housing and Shelter for the Homeless.** For this CDBG proposed project, Adams County Community Safety and Well Being (CSWB) proposes expanding upon Severe Weather Activation Program (SWAP) and launch the Adams County Housing Respite Program. The program will include outreach, motel vouchers, and navigation services. The outreach, navigation, and administration of the hotel/motel stays will be done mostly remotely in the community, including in encampments, urban hot spots, and community/county buildings.

Fair housing activities since 2015. This section provides a summary of fair housing activities undertaken by the county since their last AI in 2015.

Community Safety and Well-Being Department (CSWB). According to the county's website, this new department, "takes a holistic approach, aligning resources and strategy under a community-based, community-first philosophy to better citizen

experience and quality of life. This is done by expanding upon and amplifying the scope and reach of more traditional models. It allows the county to maximize overall service delivery through customer care, consistency, and efficacy, and by addressing needs across a more inclusive and representative continuum.”

CSWB includes the following functional areas and disciplines:

- Community Corrections,
- Criminal Justice Planning,
- Neighborhood Services (Animal Management, Code Compliance, and Graffiti Removal),
- Office of Emergency Management, and
- Poverty and Homelessness Reduction.

Community and Economic Development Department (CEDD). With a reorganization of county departments in 2015, the Community and Economic Development Department was created thus breaking down silos in order to share information and speed up the development review process. As such, the Development Review division began working closely with the county to include them in developer discussions in order to encourage the inclusion of affordable housing in prospective projects. As a result, many developers became knowledgeable about HOME funds and were interested in developing projects to include affordable housing. The county is statutorily precluded from requiring affordable housing in any development project, and as a result, the county lobbied state legislation for many months in 2015 to put an inclusionary housing bill before the House and Senate. While the bill passed in the House, it unfortunately did not pass the Senate.

Balanced Housing Plan and Needs Assessment (BHPNA). In mid-July 2017, the county ratified the Balanced Housing Plan and Needs Assessment (BHPNA). The BHPNA is an in-depth analysis of the barriers to housing as a whole and a plan to effectively address identified barriers. The BHPNA demonstrates how the county plans to address missing middle housing and density issues, among other strategies.

Accessory dwelling units. In 2019, the county amended the Zoning Code to allow for accessory dwelling units (ADUs). The purpose of the amendment was to (1) provide homeowners with an opportunity for companionship and security; (2) better utilize existing infrastructure and community resources; (3) provide a housing type that responds to changing needs and lifestyles (e.g., small families, retirees, caretakers); (4) add to the County’s stock of affordable dwelling units; and (5) protect neighborhood character and stability by ensuring that visible ADUs are compatible with surrounding land uses.

HUD funded program beneficiaries. In order to determine whether any of the jurisdiction’s minority groups appear underrepresented in Adams County’s HUD-funded programs, Root analyzed CAPERs from the past three years (2016, 2017, and 2018) and

compared the race and ethnicity of beneficiaries to the overall county population. Figure VI-7 provides a summary of this analysis by race and ethnicity. This analysis suggests that:

- White households are overrepresented as CDBG beneficiaries compared to their overall population in the county;
- African Americans are adequately represented given their benefit through HOME funding;
- Hispanic residents are adequately represented in their benefit through both CDBG and HOME;
- Overall, there are no significant disparities in beneficiaries—however, the county should continue to affirmatively market to non-Hispanic White eligible households to ensure they benefit from county programs.

Figure VI-7.
CDBG and HOME Program Beneficiaries by Race and Ethnicity, Adams County, 2016-2018

| Jurisdiction | 2016 | | 2017 | | 2018 | | 2016-2018 Total | | 2018 |
|-------------------------|------|------|------|------|------|------|-----------------|--------|--------------------|
| | CDBG | HOME | CDBG | HOME | CDBG | HOME | % CDBG | % HOME | % Total Population |
| Total | 47 | 24 | 24 | 5 | 27 | 6 | 100% | 100% | N/A |
| White | 46 | 21 | 23 | 4 | 23 | 6 | 94% | 89% | 83% |
| African American | 0 | 3 | 0 | 1 | 0 | 0 | 0% | 11% | 3% |
| Asian | 1 | 0 | 1 | 0 | 1 | 0 | 3% | 0% | 4% |
| American Indian | 0 | 0 | 0 | 0 | 3 | 0 | 3% | 0% | 1% |
| Pacific Islander | 0 | 0 | 0 | 0 | 0 | 0 | 0% | 0% | 0% |
| Hispanic | 23 | 10 | 9 | 2 | 10 | 5 | 43% | 49% | 40% |
| Not Hispanic | 12 | 14 | 15 | 3 | 17 | 1 | 57% | 51% | 60% |

Source: 2016-2018 Adams County CAPER, 2018 ACS 5-year estimates