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

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October, 2013

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

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SECTION 1: EXECUTIVE SUMMARY

The 2013 Analysis of Impediments includes unincorporated Arapahoe County and all jurisdictions in Arapahoe County, Colorado, except Aurora. The analysis includes a review of Arapahoe County and local jurisdiction laws, regulations and policies followed by an analysis of how these policies might impact the location, availability and accessibility of housing. It also identifies lending practices and household economic conditions that affect housing choice, patterns of occupancy and location of public and government assisted housing, possible forms of discrimination and other factors impacting fair housing. Arapahoe County is required to include a Five Year Housing Impediment Plan as part of its Five Year Consolidated Plan. Both plans are required by The Department of Housing and Urban Development (HUD) in order to receive Community Development Block Grant (CDBG) and HOME funding. Arapahoe County contracted with the Community Strategies Institute (CSI) to develop the updated plan.

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

- The 2009, “Analysis of Impediments to Fair Housing Choice” Report and report updates were examined and analyzed.
- Extensive research was conducted using various resources including the internet, newspaper articles, press releases, promotional material, County reports and other documents. County departments, public and private agencies and individuals were contacted for information and input.
- Electronic and paper surveys were distributed to industry professionals and residents to gain insight into real estate and lending practices.
- The public, agencies serving low income populations, and low income households were invited to a public hearing and presentation about Fair Housing issues in Arapahoe County.
- Comments from the hearing were incorporated into the draft document.
- The draft document was presented to the Arapahoe County Board of Commissioners.
- A draft was published for public comments and feedback, and any feedback was incorporated into the final document after 30 days.
- A formal adoption hearing was scheduled and the AI was adopted.
- The final document was prepared for submittal to HUD.

The purpose of this report is to:

- Review the data and impediments identified in the previous report and expand research and data into the Consortium areas.
- Determine if the 2009 impediments still exist and if new impediments must be identified in the expanded area.
- Review actions taken and evaluate the effectiveness of the actions.
- Identify any new impediments and make recommendations on actions to address the impediments.

The actions suggested are intended to:

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

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

2013 IMPEDIMENTS TO FAIR HOUSING CHOICE – ARAPAHOE COUNTY

IMPEDIMENT 1. NIMBYISM IS AN IMPEDIMENT TO FAIR HOUSING CHOICE.

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

Action 1B: Arapahoe County Community Resources staff will work with Arapahoe County Public Works & Planning Departments and municipal planning offices to identify parcels that have zoning in place to allow multi-family development as a use by right. As an outcome, the County will provide written guidance and maps to developers seeking sites that have zoning in place for multi-family housing. (Ongoing)

Action 1 C: Arapahoe County will cosponsor with other interested organizations such as Metro Denver Fair Housing Center, South Metro Board of Realtors, Colorado Civil Rights Division, Fair Housing events and workshops to educate both private citizens and housing industry companies on the benefits of having neighborhoods with a multitude of housing choices including detached homes, multi-family homes and group homes for the disabled. (Ongoing)

IMPEDIMENT 2. A LACK OF AFFORDABLE HOUSING UNITS FOR LOW AND VERY LOW-INCOME HOUSEHOLDS, IS AN IMPEDIMENT TO FAIR HOUSING CHOICE.

Action 2A: The County will prioritize the creation of low and very low income rental housing units as a priority in its Annual Action Plan and Consolidated Plan. (Annually)

Action 2B: The County will work with affordable housing developers and service providers to identify areas in the unincorporated area of the county and in municipalities to identify suitable sites for affordable housing apartment complexes. (Annually)

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

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

IMPEDIMENT 3. A LACK OF RAPID REHOUSING OPTIONS AND TRANSITIONAL HOUSING IS AN IMPEDIMENT TO FAIR HOUSING CHOICE.

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

Action 3B: Arapahoe County will continue to provide support funding for homeless service agencies providing services to the unincorporated areas of the County and to the municipalities in the County. (Ongoing)

Action 3C: Arapahoe County will consider funding requests from homeless housing and service providers who provide assistance to Arapahoe County Homeless citizens in order to support applications going to HUD under the Super-NOFA process within the Metro Denver Continuum of Care. (Annually)

IMPEDIMENT 4. LOCAL GOVERNMENT AND COUNTY REGULATIONS AND FEES ARE IMPEDIMENTS TO FAIR HOUSING CHOICE IF THOSE ITEMS LIMIT THE SUPPLY OF DECENT, AFFORDABLE HOUSING.

Action 4A: The County Community Resources Department will work with Arapahoe Public Works and Planning Department to apply the concepts contained in Comprehensive Plan Policies NH3, and Strategy NH-1-a.:

Policy NH 3.1 - Support New Affordable Housing Opportunities and Retain Existing Affordable Housing in Growth Areas.

Strategy NH 3.1(a) - Reduce Local Government Barriers to Affordable Housing (Ongoing)

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

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

Action 5A: The County will participate in and cosponsor Fair Housing Forums and workshops with Metro Denver Fair Housing Center, Colorado Civil Rights Division, South Metro Board of Realtors® and other organizations who have clear, simple information on Fair Housing regulations and guidelines for Fair Housing Choice. (Ongoing)

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

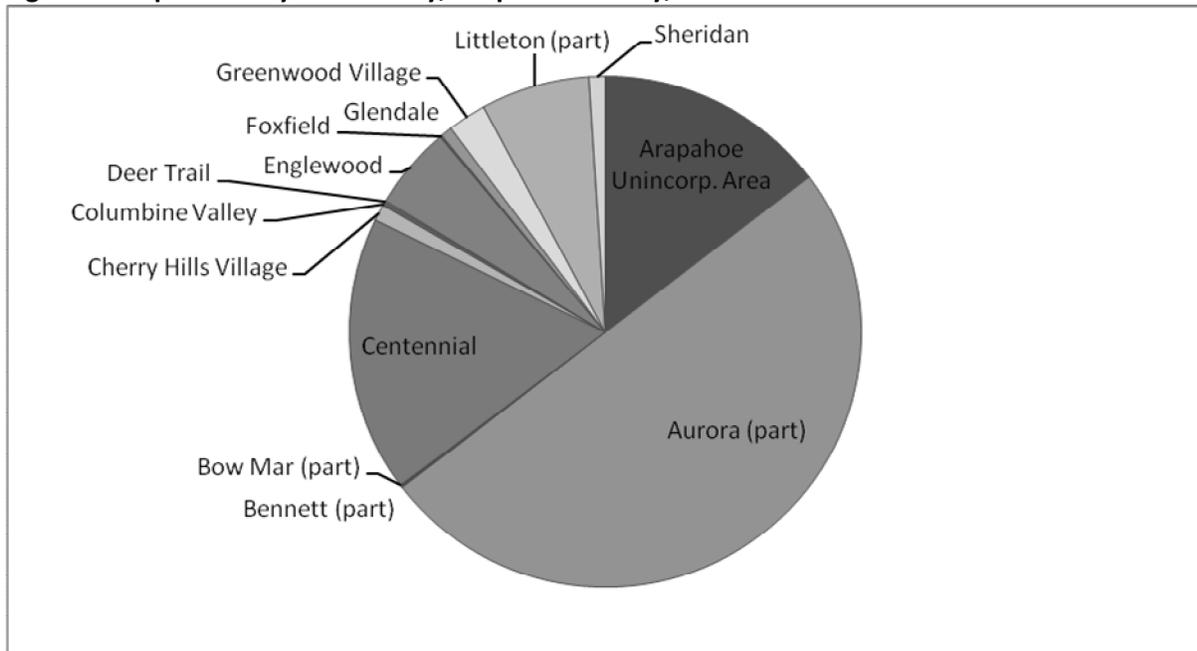
Table 1: Population in Arapahoe County, 2000 - 2018

Area	2000	2010	2013	2014	2015	2016	2017	2018
Unincorporated Arapahoe County	49,265	84,066	88,250	89,609	90,900	92,154	93,446	94,793
Aurora (part)	237,328	286,754	301,270	305,910	310,318	314,597	319,010	323,606
Bennett (part)	8	354	373	379	384	390	395	401
Bow Mar (part)	597	591	617	626	635	644	653	662
Centennial	101,377	100,694	105,175	106,795	108,334	109,827	111,368	112,972
Cherry Hills Village	5,975	6,014	6,278	6,375	6,467	6,556	6,648	6,744
Columbine Valley	1,142	1,260	1,318	1,338	1,357	1,376	1,395	1,415
Deer Trail	594	548	572	581	589	598	606	615
Englewood	31,877	30,354	31,674	32,162	32,626	33,075	33,539	34,023
Foxfield	719	687	723	734	744	755	765	776
Glendale	4,516	4,197	4,382	4,450	4,514	4,576	4,640	4,707
Greenwood Village	11,623	13,978	14,659	14,884	15,099	15,307	15,522	15,745
Littleton (part)	40,170	39,640	41,375	42,012	42,617	43,205	43,811	44,442
Sheridan	5,531	5,682	6,202	6,297	6,388	6,476	6,567	6,662
Watkins (part)	0	0	0	0	0	0	0	0
Total	490,722	574,819	602,868	612,152	620,974	629,535	638,367	647,563

Source: Colorado Demography Office and CSI

After Aurora, the next largest incorporated municipality in Arapahoe County is Centennial, followed by Littleton and Englewood.

Figure 1: Population by Community, Arapahoe County, 2013



Source: Colorado Demography Office and CSI

POPULATION BY AGE

The following table shows the population in Arapahoe County in 2011 by age group. Twenty-seven percent (27%) of the population outside Aurora was age 19 or under in 2011.

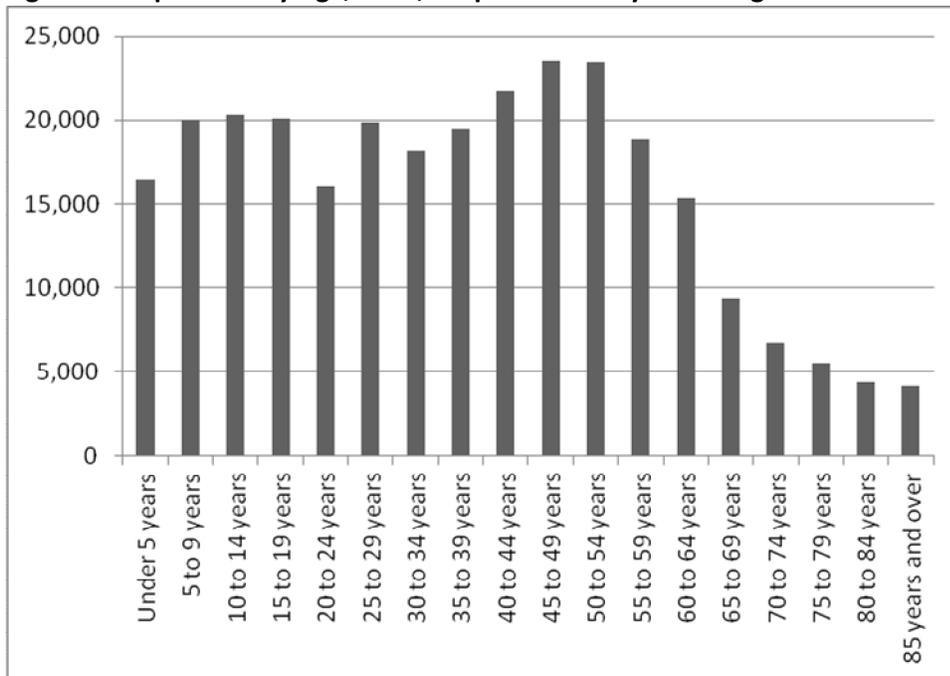
Table 2: Arapahoe County 2011 Population by Age

Age Group	Arapahoe County	Arapahoe County Excluding Aurora	Percent of Total (Excluding Aurora)
Under 5 years	40,380	16,462	6%
5 to 9 years	41,642	20,018	7%
10 to 14 years	38,175	20,303	7%
15 to 19 years	38,324	20,112	7%
20 to 24 years	34,890	16,091	6%
25 to 29 years	42,174	19,828	7%
30 to 34 years	40,780	18,192	6%
35 to 39 years	40,969	19,468	7%
40 to 44 years	41,060	21,752	8%
45 to 49 years	42,909	23,498	8%
50 to 54 years	41,835	23,398	8%
55 to 59 years	35,855	18,890	7%
60 to 64 years	28,730	15,381	5%
65 to 69 years	18,235	9,408	3%
70 to 74 years	12,519	6,733	2%
75 to 79 years	9,854	5,471	2%
80 to 84 years	7,777	4,351	2%
85 years and over	7,400	4,166	1%
Total	563,508	283,522	100%

Source: US Census American Community Survey and CSI

In the areas of Arapahoe County excluding Aurora, the largest population group is the Baby Boom generation. In 2011, there were almost 58,000 people age 50 – 65 in Arapahoe County. The number of seniors is low compared to the number of children, younger adults and those approaching retirement.

Figure 2: Population by Age, 2011, Arapahoe County Excluding Aurora



Source: US Census American Community Survey and CSI

The communities of Columbine Valley, Deer Trail, Foxfield and Greenwood Village have the oldest populations in Arapahoe County. Sheridan, Glendale, Englewood and unincorporated Arapahoe County have the youngest populations.

Table 3: Average Age in Arapahoe County Communities, 2011

	Average Age
Bennett (part)	42.3
Bow Mar (part)	44.3
Centennial	40.5
Cherry Hills Village	45.7
Columbine Valley	53.3
Deer Trail	48.3
Englewood	36.9
Foxfield	45.9
Glendale	29.7
Greenwood Village	45.5
Littleton (part)	41.8
Sheridan	29.0
Unincorporated	33.0

Source: US Census American Community Survey and CSI

POPULATION BY RACE, ETHNICITY, AND LIMITED ENGLISH PROFICIENCY

The majority of the population in Arapahoe County, excluding Aurora, is white. Those who identify themselves as Hispanic or Latino make up 11.5% of the total population. Under five percent (5%) of the population is African American and another 5% are Asian.

Table 4: Population by Race and Ethnicity, Arapahoe County Excluding Aurora, 2011

	Number	Percent
Hispanic or Latino	32,612	11.5%
White	237,604	83.8%
African American	12,905	4.6%
American Indian	1,472	0.5%
Asian	13,471	4.8%
Native Hawaiian and Other Pacific Islander	262	0.1%
Some other Race	8,572	3.0%
Two or More Races	9,236	3.3%
Total Population	283,522	100.0%

Source: US Census American Community Survey and CSI

Communities on the eastern plains in Arapahoe County have the smallest minority populations. Sheridan, the unincorporated areas, and Glendale have the highest minority concentrations. Sheridan, Glendale and Englewood have the highest percentage of Hispanics or Latinos. Appendix C provides maps of Arapahoe County showing the breakdown of race and ethnicity throughout the county.

Table 5: Population by Race and Ethnicity, Arapahoe County and Cities, 2011

	Total Population	White	Black or African American	American Indian and Alaska Native	Asian	Native Hawaiian and Other Pacific Islander	Some other race	Two or More Races	Hispanic or Latino
Arapahoe County	563,508	75.5%	9.9%	0.8%	4.8%	0.2%	5.0%	3.8%	18.1%
Arapahoe County Excluding Aurora	283,522	83.8%	4.6%	0.5%	4.8%	0.1%	3.0%	3.3%	11.5%
Bennett	284	94.0%	0.0%	2.5%	0.0%	0.0%	1.8%	1.8%	10.6%
Bow Mar	666	98.6%	0.0%	0.0%	0.0%	0.0%	1.1%	0.3%	1.7%
Centennial	100,643	87.4%	3.1%	0.3%	4.3%	0.2%	1.8%	3.0%	7.7%
Cherry Hills Village	5,983	92.9%	2.3%	0.3%	2.2%	0.0%	0.0%	2.3%	2.4%
Columbine Valley	1,319	97.3%	0.3%	0.0%	1.3%	0.0%	0.0%	1.1%	4.5%
Deer Trail	381	96.9%	0.0%	0.8%	0.8%	0.0%	0.0%	1.6%	14.2%
Englewood	30,433	84.7%	2.1%	0.8%	2.4%	0.0%	6.5%	3.4%	19.2%
Foxfield	831	94.9%	1.0%	0.0%	2.4%	0.0%	0.4%	1.3%	2.3%
Glendale	4,268	79.7%	6.5%	0.2%	1.5%	0.0%	8.9%	3.2%	38.8%
Greenwood Village	13,638	91.2%	0.3%	0.4%	5.6%	0.2%	0.8%	1.5%	4.7%
Littleton (part)	39,413	88.8%	1.2%	0.6%	2.7%	0.1%	3.8%	2.8%	12.8%
Sheridan	5,684	70.2%	7.5%	2.2%	0.8%	0.0%	15.6%	3.7%	40.8%
Unincorporated	79,979	75.2%	9.7%	0.5%	7.9%	0.0%	2.4%	4.2%	11.3%

Source: US Census American Community Survey and CSI

Just over 11% of Arapahoe County's (excluding Aurora) population is foreign born. While the overall population in Arapahoe County has increased 12.4% between 2000 and 2011, the foreign born population increased 53.5%. Glendale, unincorporated Arapahoe County, Greenwood Village and Sheridan have the highest number of foreign born residents.

Table 6: Place of Birth, 2011

	Total	Native	Foreign born	Naturalized U.S. citizen	Not a U.S. citizen
Arapahoe County	563,508	85.1%	14.9%	5.2%	9.7%
Arapahoe County Excluding Aurora	283,522	88.8%	11.2%	4.9%	6.3%
Bennett (part)	284	98.2%	1.8%	1.8%	0.0%
Bow Mar (part)	666	99.1%	0.9%	0.5%	0.5%
Centennial	100,643	92.4%	7.6%	4.5%	3.1%
Cherry Hills Village	5,983	94.3%	5.7%	4.4%	1.3%
Columbine Valley	1,319	97.4%	2.6%	1.1%	1.4%
Deer Trail	381	97.1%	2.9%	2.1%	0.8%
Englewood	30,433	90.1%	9.9%	2.7%	7.2%
Foxfield	831	96.5%	3.5%	2.3%	1.2%
Glendale	4,268	71.5%	28.5%	2.3%	26.1%
Greenwood Village	13,638	87.3%	12.7%	8.4%	4.3%
Littleton (part)	39,413	91.1%	8.9%	3.5%	5.4%
Sheridan	5,684	87.2%	12.8%	1.8%	11.0%
Unincorporated Arapahoe County	79,979	83.3%	16.7%	6.9%	9.8%

Source: US Census American Community Survey and CSI

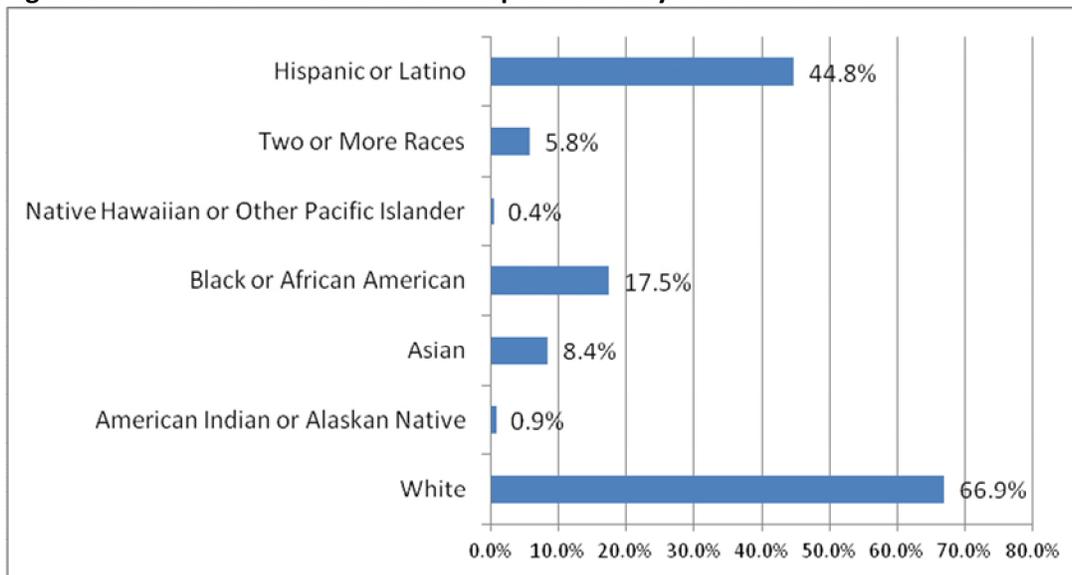
Table 7: School District Enrollment by Race and Ethnicity, 2011

	White	American Indian or Alaskan Native	Asian	Black or African American	Native Hawaiian or Other Pacific Islander	Two or More Races	Hispanic or Latino	Total
Englewood 1	1,604	35	28	97	8	74	1,108	1,846
Sheridan 2	271	16	41	63	1	25	1,224	417
Cherry Creek 5	29,725	282	4,270	6,449	139	2,427	9,297	43,292
Littleton 6	11,695	84	498	198	17	578	2,501	13,070
Deer Trail 26J	157						21	157
Adams Arapahoe 28J	8,429	273	1,746	6,886	178	1,407	20,777	18,919
Byers 32J	422		3	4	1	13	51	443
Totals	52,303	690	6,586	13,697	344	4,524	34,979	78,144
Percent of Total	66.9%	0.9%	8.4%	17.5%	0.4%	5.8%	44.8%	100.0%

Source: Arapahoe County School Districts, CSI

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

Figure 3: 2011 School Enrollment for Arapahoe County School Districts



Source: Arapahoe County School Districts, CSI

In Arapahoe County, just over 8% of people age five and older speak a language other than English as their primary language. When Aurora is taken out of county totals, those speaking languages other than Spanish are more prevalent than those speaking Spanish. In many cities within the county, Spanish is the second most spoken language besides English.

Table 8: 2011 Language Spoken for Population Age 5 and Up

	Speak only English	Speak Spanish	Speak other languages	Total	% Speak only English
Arapahoe County	408,543	65,634	48,951	474,177	86.2%
Arapahoe County Excluding Aurora	223,889	19,801	23,370	243,690	91.9%
Bennett (part)	263	10	0	273	96.3%
Bow Mar (part)	617	12	3	629	98.1%
Littleton (part)	31,813	3,516	1,813	35,329	90.0%
Centennial	85,022	4,101	6,481	89,123	95.4%
Cherry Hills Village	5,219	193	326	5,412	96.4%
Columbine Valley	1,241	23	23	1,264	98.2%
Deer Trail	356	0	11	356	100.0%
Englewood	23,613	3,646	1,322	27,259	86.6%
Foxfield	769	18	29	787	97.7%
Glendale	2,434	1,164	403	3,598	67.6%
Greenwood Village	11,306	539	1,385	11,845	95.4%
Sheridan	3,836	1,273	34	5,109	75.1%
Unincorporated	57,400	5,306	11,540	62,706	91.5%

Source: US Census American Community Survey and CSI

POPULATION WITH DISABILITIES

The US Census American Community Survey collects data related to disability status. For 2009 – 2011, this data is not available at the municipal level, therefore the following table does include Aurora. In Arapahoe County, 8.8% of the population, or just under 50,000 people, had a disability between 2009 and 2011. Persons may have more than one self reported disability in the table below. The most common disabilities were ambulatory difficulty, cognitive difficulty, and difficulty with independent living. These disabilities can all require service enriched or modified housing units.

Table 9: Disability Status (ALL of Arapahoe County)

	%	Number
Disability	8.8%	49,906
Hearing difficulty	2.6%	15,055
Vision difficulty	1.7%	9,479
Cognitive difficulty	3.2%	18,222
Ambulatory difficulty	4.1%	23,575
Self-care difficulty	1.6%	9,309
Independent living difficulty	3.0%	17,165

Source: US Census American Community Survey 2009-2011

The percent of the population with disabilities increases as the population ages. For persons age five and under, the two disabilities that are tabulated are hearing and vision disabilities. For persons age 65 and older, 32% have one of the disabilities listed above. As seniors age, the frequency of ambulatory, self care and independent living disabilities increases greatly.

Table 10: Persons with Disabilities by Age (ALL of Arapahoe County)

	With Disability	Percent within Age Range
Population under 5 years	100	0.2%
Population 5 to 17 years	4,229	4.0%
Population 18 to 64 years	27,348	7.5%
Population 65 years and over	18,229	32.3%

Source: US Census American Community Survey 2009-2011

HOUSEHOLDS

As Arapahoe County's population has grown, so has the number of households within the county. The following table shows the number of households in Arapahoe County, excluding Aurora. Household numbers have continued to grow, despite the economic downturn of the past five years.

Table 11: Households in Arapahoe County, 2000 - 2011

	2000	2009	2011
Households	98,350	109,718	112,667
% Change		11.6%	2.7%

Source: US Census American Community Survey and CSI

Of the 112,136 estimated households in Arapahoe County, excluding Aurora, the majority lives in Centennial, Littleton, and unincorporated Arapahoe County.

Table 12: Households by Municipality, Arapahoe County, 2011

	Households
Arapahoe County	221,136
Arapahoe County Excluding Aurora	112,667
Aurora	108,469
Bennett (part)	99
Bow Mar (part)	211
Centennial	37,299
Cherry Hills Village	1,962
Columbine Valley	526
Deer Trail	162
Englewood	14,405
Foxfield	281
Glendale	2,471
Greenwood Village	5,608
Littleton (part)	17,277
Sheridan	2,128
Unincorporated Arapahoe County	30,238

Source: US Census American Community Survey and CSI

HUD estimates households by type for the Consolidated Plan. The following table shows these types and estimates the total number and percent of all households by type in 2011. By far, the most common household type is small family households, those with two to four family members. Large related households have five or more related household members and make up only 7% of Arapahoe County households.

Table 13: Household Type, Arapahoe County 2011

	Percent of Total	Total Number
Total Households		112,667
Small Family Households	45.4%	51,162
Large Family Households	7.0%	7,860
Household contains at least one person 62-74 years of age	13.7%	15,443
Household contains at least one person age 75 or older	9.2%	10,360
Households with one or more children 6 years old or younger	14.7%	16,541

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

HOUSEHOLD INCOMES

In Arapahoe County (excluding Aurora), 25%, or 27,379, households have incomes below \$35,000 a year. Another 30%, or 33,803, have incomes between \$35,000 and \$75,000 per year, and 45%, or 50,273, have incomes that are higher than \$75,000 per year.

Table 14: Household Incomes in Arapahoe County, 2006 – 2010 Average

Household Income	Arapahoe County	Percent	Arapahoe County excluding Aurora	Percent
Less than \$5,000	7,893	3.6%	3,273	2.9%
\$5,000 to \$9,999	5,684	2.6%	2,630	2.4%
\$10,000 to \$14,999	9,137	4.2%	3,971	3.6%
\$15,000 to \$19,999	8,916	4.1%	3,855	3.5%
\$20,000 to \$24,999	9,819	4.5%	3,792	3.4%
\$25,000 to \$34,999	21,336	9.7%	9,858	8.8%
\$35,000 to \$49,999	30,107	13.8%	13,392	12.0%
\$50,000 to \$74,999	42,505	19.4%	20,411	18.3%
\$75,000 to \$99,999	29,078	13.3%	14,598	13.1%
\$100,000 to \$149,999	31,154	14.2%	18,299	16.4%
\$150,000 or more	23,280	10.6%	17,376	15.6%
Total Households	218,909	100.0%	111,455	100.0%

Source: US Census American Community Survey and CSI

The median income in Arapahoe County (excluding Aurora), was \$68,318 in 2010, the most recent year that census data is available for each municipality. The median owner income was just over \$89,500, and the median renter income was just over \$52,000. Cherry Hills Village, Bow Mar, Bennett, Greenwood Village and Foxfield had the highest median incomes. The difference between owner and renter incomes in these communities was much higher than in communities with lower median incomes and a higher number of renters, including Englewood, Littleton, and Centennial.

Table 15: Median Household Incomes in Arapahoe County and Municipalities, by Tenure 2006 – 2010 Average

	Median Income	Owners	Renters
Arapahoe County	\$58,719	\$76,998	\$32,475
Arapahoe County excluding Aurora	\$68,318	\$89,502	\$52,012
Aurora (part)	\$51,644	\$66,787	\$31,039
Bennett (part)	\$118,409	\$118,409	-
Bow Mar (part)	\$142,917	\$146,250	\$30,000
Centennial	\$87,007	\$95,157	\$52,071
Cherry Hills Village	\$219,620	\$223,625	\$117,778
Columbine Valley	\$130,000	\$136,667	\$100,417
Deer Trail	\$47,500	\$75,625	\$14,531
Englewood	\$42,416	\$58,696	\$30,618
Foxfield	\$110,385	\$120,179	\$16,932
Glendale	\$33,707	\$69,875	\$31,838
Greenwood Village	\$112,009	\$155,682	\$44,282
Littleton (part)	\$52,873	\$75,669	\$28,564
Sheridan	\$32,382	\$40,665	\$27,629
Unincorp	\$67,318	\$92,626	\$50,200

Source: US Census American Community Survey and CSI

CSI has estimated the number of households by AMI level for each municipality in Arapahoe County in 2013. The 2013 HUD median income in the Denver metro MSA is \$77,800. County-wide (excluding Aurora), forty-six percent (46%) of all Arapahoe County households have incomes at or below 80% of the median income for the county, or below an income of \$62,240. Households below 80% AMI are eligible for many HUD funded housing units and programs.

Table 16: Incomes by Municipality and AMI level, 2013

% AMI (2013)	Arapahoe County	Arapahoe County excluding Aurora	Bennett (part)	Bow Mar (part)	Centennial
0 to 30%	25,122	10,915	0	3	1,666
31 to 50 %	45,492	19,946	4	20	4,161
51 to 80%	43,107	19,912	10	16	6,251
81 to 100%	24,934	12,044	8	8	4,452
Over 100%	80,255	48,638	73	164	20,976
% AMI (2013)	Cherry Hills Village	Columbine Valley	Deer Trail	Englewood	Foxfield
0 to 30%	59	11	55	2,348	14
31 to 50 %	51	34	25	4,085	27
51 to 80%	90	60	27	3,277	39
81 to 100%	66	48	12	1,697	21
Over 100%	1,732	360	54	3,061	155
% AMI (2013)	Glendale	Greenwood Village	Littleton (part)	Sheridan	Unincorp
0 to 30%	649	334	2,395	429	2,952
31 to 50 %	721	689	4,071	883	5,175
51 to 80%	531	631	3,186	501	5,292
81 to 100%	164	344	1,808	225	3,191
Over 100%	345	3,386	5,664	254	12,413

Source: US Census American Community Survey and CSI

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

Table 17: Households by AMI and Tenure, 2013

% AMI	Owners	%	Renters	%
0 to 30%	3,155	4.1%	7,760	22.3%
31 to 50 %	8,613	11.2%	11,333	32.5%
51 to 80%	12,241	16.0%	7,671	22.0%
81 to 100%	8,683	11.3%	3,361	9.6%
Over 100%	43,887	57.3%	4,751	13.6%

Source: US Census American Community Survey and CSI

FAMILIES IN POVERTY

Fewer owner occupied households in Arapahoe County live in poverty, according to the American Community Survey. However, just over 20% of all renters in Arapahoe County (excluding Aurora) do live below the poverty level. The following chart shows the poverty level by household size for Arapahoe County.

Table 18: Poverty Level by Households Size, Arapahoe County, 2013

Household Size*	Annual Income
1 Person	\$11,176
2 Persons	\$15,136
3 Persons	\$19,096
4 Persons	\$23,056
5 Persons	\$27,016
6 Persons	\$30,976
7 Persons	\$34,936
8 Persons	\$38,896

Source: US Census American Community Survey and CSI

Sheridan renters have the highest poverty rate of all incorporated areas in Arapahoe County. Glendale, Foxfield, Littleton, and Englewood renters also have high poverty rates.

Table 19: Households in Poverty by Tenure, 2011

Area	Total Owner occupied	# at or below poverty level	% at or below poverty level
Arapahoe County	104,230	3,331	3.2%
Arapahoe County Excluding Aurora	57,977	1,404	2.4%
Aurora (part)	46,253	1,927	4.2%
Bennett (part)	95	0	0.0%
Bow Mar (part)	180	0	0.0%
Centennial	24,686	625	2.5%
Cherry Hills Village	1,742	18	1.0%
Columbine Valley	430	0	0.0%
Deer Trail	79	0	0.0%
Englewood	4,170	132	3.2%
Foxfield	236	1	0.4%
Glendale	75	0	0.0%
Greenwood Village	3,315	54	1.6%
Littleton (part)	7,326	153	2.1%
Sheridan	688	21	3.1%
Unincorp.	14,955	400	2.7%
Area	Total Renter occupied	# at or below poverty level	% at or below poverty level
Arapahoe County	40,825	9,928	24.3%
Arapahoe County Excluding Aurora	17,117	3,541	20.7%
Aurora (part)	23,708	6,387	26.9%
Bennett (part)	0	0	
Bow Mar (part)	15	0	0.0%
Centennial	3,316	298	9.0%
Cherry Hills Village	11	0	0.0%
Columbine Valley	12	0	0.0%
Deer Trail	25	0	0.0%
Englewood	2,842	628	22.1%
Foxfield	28	13	46.4%
Glendale	587	165	28.1%
Greenwood Village	641	63	9.8%
Littleton (part)	2,884	613	21.3%
Sheridan	680	357	52.5%
Unincorp.	6,076	1,404	23.1%

Source: US Census American Community Survey and CSI

The US Census provides a breakdown of households in poverty by age, race and ethnicity, educational attainment and employment status. Arapahoe County residents under the age of 65 have higher incidences of poverty than those 65 and older. African Americans and residents of some other race have the highest incidence of poverty of all races. Data is suppressed for American Indian and Alaska Natives and Native Hawaiian and other Pacific Islanders due to the small sample size for these populations. Twenty-two percent (21.6%) of those of Hispanic or Latino ethnic origin live below the poverty level.

Educational attainment is a significant indicator of poverty. Of those without a high school education, 26.8% live below the poverty level. Of those who are employed in Arapahoe County, only 6.4% live below the poverty level, while 25.7% of the unemployed live below the poverty level.

Table 20: Poverty Statistics, Arapahoe County, 2011

	Percent below poverty level
AGE	
Under 18 years	16.9%
Related children under 18 years	16.6%
18 to 64 years	10.9%
65 years and over	7.3%
RACE AND HISPANIC OR LATINO ORIGIN	
One race	N
White	9.6%
Black or African American	22.8%
American Indian and Alaska Native	N
Asian	9.2%
Native Hawaiian and Other Pacific Islander	N
Some other race	30.1%
Two or more races	13.8%
Hispanic or Latino origin (of any race)	21.6%
White alone, not Hispanic or Latino	7.5%
EDUCATIONAL ATTAINMENT	
Population 25 years and over	9.2%
Less than high school graduate	26.8%
High school graduate (includes equivalency)	8.9%
Some college, associate's degree	8.9%
Bachelor's degree or higher	5.5%
EMPLOYMENT STATUS	
Civilian labor force 16 years and over	8.2%
Employed	6.4%
Male	5.6%
Female	7.4%
Unemployed	25.7%
Male	24.2%
Female	27.4%

Source: US Census American Community Survey and CSI

ECONOMY AND LOCAL EMPLOYMENT

The US Census Bureau American Community Survey provides information that makes it possible to estimate labor force dynamics for the portion of Arapahoe County that excludes Aurora. The latest year that this information is available for is 2011.

There were just under 160,500 persons in the labor force in Arapahoe County in 2011. Of these, 149,719 were employed and 10,273 were unemployed. The unemployment rate was 6.4% in the area that excludes Aurora. The March 2013 not seasonally adjusted unemployment rate for the entire county was 6.9%, lower than the statewide rate of 7.3%.

Table 21: Labor Force Information, Arapahoe County, 2011

	Arapahoe County	Arapahoe County Excluding Aurora
In labor force	314,727	160,431
Civilian labor force	312,730	159,992
Employed	289,548	149,719
Unemployed	23,182	10,273
Armed Forces	1,997	439
Not in labor force	120,101	61,639
Total Population 16 and over	434,828	222,070
Civilian Unemployment Rate:	7.4%	6.4%

Source: US Census American Community Survey

The labor force in Arapahoe County (excluding Aurora), grew from 2000 – 2011, by 14.7%. Those that were employed grew by 14,181, or 10.5%, and the unemployed grew by 6,318, or 159.7%.

Table 22: Labor Force Changes, Arapahoe County (excluding Aurora), 2000 - 2011

	2000	2011	Change	% Change
In labor force	139,839	160,431	20,592	14.7%
Civilian labor force	139,493	159,992	20,499	14.7%
Employed	135,538	149,719	14,181	10.5%
Unemployed	3,955	10,273	6,318	159.7%
Armed Forces	346	439	93	26.9%
Not in labor force	53,692	61,639	7,947	14.8%
Total Population 16 and over	193,531	222,070	28,539	14.7%
Civilian Unemployment Rate:	2.8%	6.4%		

Source: US Census American Community Survey

The industries with highest employment in Arapahoe County were educational service, healthcare, and social services, retail trade, professional, scientific, management, and administrative and waste management services, and arts, entertainment, recreation, and accommodation and food services.

Table 23: Employment by Industry, Arapahoe County 2011

	Arapahoe County	Arapahoe County Excluding Aurora	% of Total
Agriculture, forestry, fishing and hunting, and mining	2,221	1,386	0.9%
Construction	20,422	8,663	5.8%
Manufacturing	16,365	8,622	5.8%
Wholesale trade	9,243	5,034	3.4%
Retail trade	35,080	17,073	11.4%
Transportation and warehousing, and utilities	15,802	6,768	4.5%
Information	12,380	6,827	4.6%
Finance and insurance, and real estate and rental and leasing	29,800	16,921	11.3%
Professional, scientific, and management, and administrative and waste management services	40,725	23,222	15.5%
Educational services, and health care and social assistance	54,398	29,189	19.5%
Arts, entertainment, and recreation, and accommodation and food services	26,359	12,963	8.7%
Other services, except public administration	14,686	7,616	5.1%
Public administration	12,067	5,435	3.6%
Total employed civilian population 16 years and over	289,548	149,719	100.0%

Source: US Census American Community Survey

Employment in arts, entertainment and recreation, and accommodations and food services, educational services, health care, social assistance, transportation and warehousing, and other services had the biggest percent changes in employment from 2000 – 2010. The industries with the biggest losses in employment were information, construction, and manufacturing.

Table 24: Changes in Employment by Industry, 2000 – 2010, Arapahoe County (excluding Aurora)

	2000	2011	Change	% Change
Agriculture, forestry, fishing and hunting, and mining	1,332	1,386	54	4.1%
Construction	9,301	8,663	-638	-6.9%
Manufacturing	9,154	8,622	-532	-5.8%
Wholesale trade	5,270	5,034	-236	-4.5%
Retail trade	15,907	17,073	1,166	7.3%
Transportation and warehousing, and utilities	5,604	6,768	1,164	20.8%
Information	10,560	6,827	-3,733	-35.4%
Finance and insurance, and real estate and rental and leasing	15,841	16,921	1,080	6.8%
Professional, scientific, and management, and administrative and waste management services	19,556	23,222	3,666	18.7%
Educational services, and health care and social assistance	22,902	29,189	6,287	27.5%
Arts, entertainment, and recreation, and accommodation and food services	9,179	12,963	3,784	41.2%
Other services, except public administration	6,111	7,616	1,505	24.6%
Public administration	4,821	5,435	614	12.7%
Total employed civilian population 16 years and over	135,538	149,719	14,181	10.5%

Source: US Census American Community Survey

Arapahoe County has the fourth highest wages of all Colorado counties, though wages fall below those in Broomfield, Denver, and Boulder Counties. Wages are higher than in Douglas or Jefferson Counties, and higher than Colorado averages.

Table 25: Average Wages Ranking in Colorado, 4th Quarter 2011

Rank	Area Name	Total Average Employment	*Average Hourly Wage	Average Weekly Wage	*Average Annual Wage
1	Broomfield County, Colorado	30,896	\$30.18	\$1,207	\$62,764
2	Denver County, Colorado	428,183	\$29.05	\$1,162	\$60,424
3	Boulder County, Colorado	158,433	\$27.85	\$1,114	\$57,928
4	Arapahoe County, Colorado	281,833	\$27.70	\$1,108	\$57,616
5	Douglas County, Colorado	92,784	\$26.63	\$1,065	\$55,380
6	Rio Blanco County, Colorado	3,249	\$26.08	\$1,043	\$54,236
7	Jefferson County, Colorado	207,726	\$24.40	\$976	\$50,752
8	Moffat County, Colorado	4,938	\$22.55	\$902	\$46,904
9	Garfield County, Colorado	24,219	\$22.45	\$898	\$46,696
10	Pitkin County, Colorado	14,522	\$22.08	\$883	\$45,916
	Colorado	2,236,737	\$24.38	\$975	\$50,700

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

The following table shows average hourly, weekly and annual wages by industry in Arapahoe County. The latest information provided by the Colorado Department of Labor is for 2011. The industries with the highest wages are mining, management of companies and enterprises, professional, scientific, and technical services and information. Some of these industries are growing in Arapahoe County, but others, like information, have declined from 2000 – 2010.

Table 26: Average Wages by Industry in Arapahoe County, 4th Quarter 2011

Industry Title	*Average Hourly Wage	Average Weekly Wage	*Average Annual Wage
Accommodation and Food Services	\$8.40	\$336	\$17,472
Admin. and Support/Waste Management and Remediation Services	\$17.30	\$692	\$35,984
Agriculture, Forestry, Fishing and Hunting	\$22.95	\$918	\$47,736
Arts, Entertainment, and Recreation	\$37.95	\$1,518	\$78,936
Construction	\$27.43	\$1,097	\$57,044
Educational Services	\$18.95	\$758	\$39,416
Finance and Insurance	\$35.58	\$1,423	\$73,996
Health Care and Social Assistance	\$25.60	\$1,024	\$53,248
Information	\$41.28	\$1,651	\$85,852
Management of Companies and Enterprises	\$56.03	\$2,241	\$116,532
Manufacturing	\$27.25	\$1,090	\$56,680
Mining	\$65.83	\$2,633	\$136,916
Other Services (except Public Administration)	\$18.73	\$749	\$38,948
Professional, Scientific, and Technical Services	\$44.60	\$1,784	\$92,768
Public Administration	\$28.08	\$1,123	\$58,396
Real Estate and Rental and Leasing	\$29.30	\$1,172	\$60,944
Retail Trade	\$14.60	\$584	\$30,368
Transportation and Warehousing	\$24.70	\$988	\$51,376
Unclassified	\$69.18	\$2,767	\$143,884
Utilities	\$38.80	\$1,552	\$80,704
Wholesale Trade	\$42.53	\$1,701	\$88,452

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

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

HOUSING MARKET PROFILE

MARKET OVERVIEW

Since the last Analysis of Impediments to Fair Housing Choice for Arapahoe County in 2009, the county housing market has heated up. Historic rental market information is available from the Apartment Association of Metro Denver. Low vacancy rates and rising rents are placing additional cost and access burdens on low income renters. Foreclosures are declining as home prices rise due to pent up demand and low interest rates. Low and moderate income households are becoming priced out of some sub-markets within Arapahoe County where they previously could afford a home.

In the area of Arapahoe County excluding Aurora, 68% of all housing units are owner occupied and 32% are renter occupied. Owner occupancy rates range from 9% in Glendale, to 100% in Bennett.

Table 27: Housing Units by Tenure, Arapahoe County, 2011

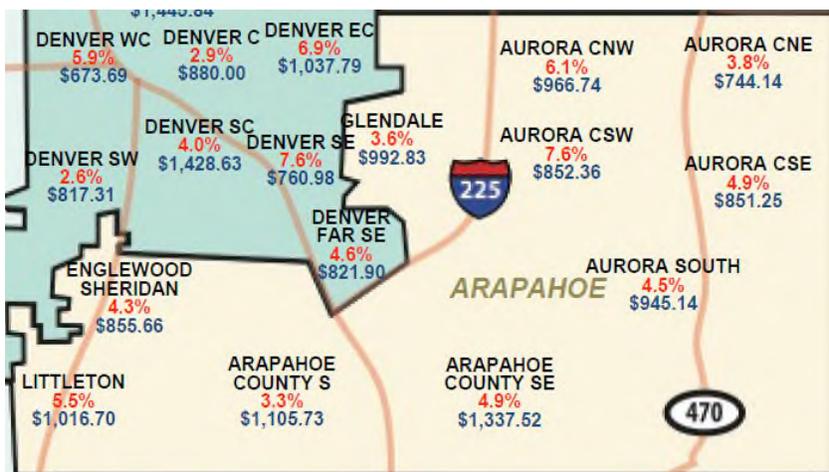
	Total Units	Owner-occupied housing units	% of Total	Renter-occupied housing units	% of Total
Arapahoe County	221,136	143,953	65%	77,183	35%
Arapahoe County Excluding Aurora	112,667	76,769	68%	35,898	32%
Bennett (part)	99	99	100%	0	0%
Bow Mar (part)	211	192	91%	19	9%
Centennial	37,299	31,499	84%	5,800	16%
Cherry Hills Village	1,962	1,929	98%	33	2%
Columbine Valley	526	514	98%	12	2%
Deer Trail	162	103	64%	59	36%
Englewood	14,405	7,010	49%	7,395	51%
Foxfield	281	249	89%	32	11%
Glendale	2,471	220	9%	2,251	91%
Greenwood Village	5,608	3,947	70%	1,661	30%
Littleton (part)	17,277	10,611	61%	6,666	39%
Sheridan	2,128	1,125	53%	1,003	47%
Unincorporated	30,238	19,271	64%	10,967	36%

Source: US Census Bureau, American Community Survey 2009 - 2011

Sixty-two percent (62%) of housing units in Arapahoe County are single family detached units. Owner occupied units are 82% single family homes, while 43% of rentals are single family homes. Renters are much more likely than owners to live in properties with more than 10 units. Larger properties are located in Centennial, Englewood, Glendale, Greenwood Village, Sheridan and unincorporated Arapahoe County.

RENT PROFILE

The Apartment Association of Metro Denver conducts a quarterly rent and vacancy survey that includes Arapahoe County and county subdivisions.



Source: Apartment Association of Metro Denver

The following table presents the vacancy rates and average rents throughout the county during the 1st quarter of 2013. Vacancy rates are extremely low, indicating a tight rental market. Throughout

Arapahoe County, the vacancy rate was 4.1%, below the 5% level considered market equilibrium. The average rent was \$950. Vacancy rates in Arapahoe County are running as low as 2.3% in the Aurora Central Northeast market area, and average rents range from \$791 in Aurora Central Northeast to \$1,343 in Arapahoe County Southeast.

Table 28: Rents and Vacancies in Arapahoe County, 1st Quarter 2013

	Vacancy Rate	Average Rent
Arapahoe County	4.1%	\$950
Arapahoe County - South	3.4%	\$1,131
Arapahoe County - Southeast	4.2%	\$1,343
Aurora - Central Northeast	2.3%	\$791
Aurora - Central Northwest	5.3%	\$929
Aurora - Central Southeast	3.8%	\$873
Aurora - Central Southwest	3.8%	\$827
Aurora - South	4.3%	\$963
Englewood, Sheridan	4.4%	\$947
Glendale	5.0%	\$965
Littleton	3.5%	\$963

Source: Apartment Association of Metro Denver Rent and Vacancy Survey, 1st Quarter 2013

Efficiency and one bedroom rents are most affordable in Arapahoe County. The rents for two bedroom units with two bathrooms have rents 27% higher, on average, than those with only one bedroom.

Table 29: Average Rents by Bedroom Size, 1st Quarter 2013

	Efficiency	1 Bed	2 Bed 1 Bath	2 Bed 2 Bath	3 Bed	Other	All
Arapahoe	\$632.68	\$823.70	\$875.36	\$1,116.60	\$1,356.72	\$1,275.93	\$950.29
Arapahoe County - South		\$963.24	\$1,069.65	\$1,223.54	\$1,526.75	\$1,185.00	\$1,130.65
Arapahoe County - Southeast	\$845.00	\$1,186.69	\$1,346.00	\$1,479.24	\$1,738.29	\$1,681.00	\$1,342.51
Aurora - Central Northeast	\$561.07	\$682.99	\$750.64	\$943.44	\$1,104.76	\$1,187.50	\$791.21
Aurora - Central Northwest	\$590.13	\$778.14	\$885.92	\$1,107.24	\$1,274.83	\$1,333.00	\$928.75
Aurora - Central Southeast	\$612.50	\$758.01	\$819.67	\$980.76	\$1,391.97	\$1,645.71	\$873.48
Aurora - Central Southwest	\$545.55	\$736.71	\$790.28	\$953.19	\$1,022.60	\$650.00	\$826.78
Aurora - South	\$674.70	\$827.56	\$927.75	\$1,095.92	\$1,416.99	\$1,251.18	\$963.44
Englewood, Sheridan	\$531.15	\$817.40	\$965.75	\$1,152.12	\$1,376.44	\$1,490.00	\$947.30
Glendale	\$627.80	\$835.87	\$859.18	\$1,409.76	\$2,141.58		\$965.15
Littleton	\$742.48	\$871.19	\$855.47	\$1,177.07	\$1,650.00		\$962.78

Source: Apartment Association of Metro Denver Rent and Vacancy Survey, 1st Quarter 2013

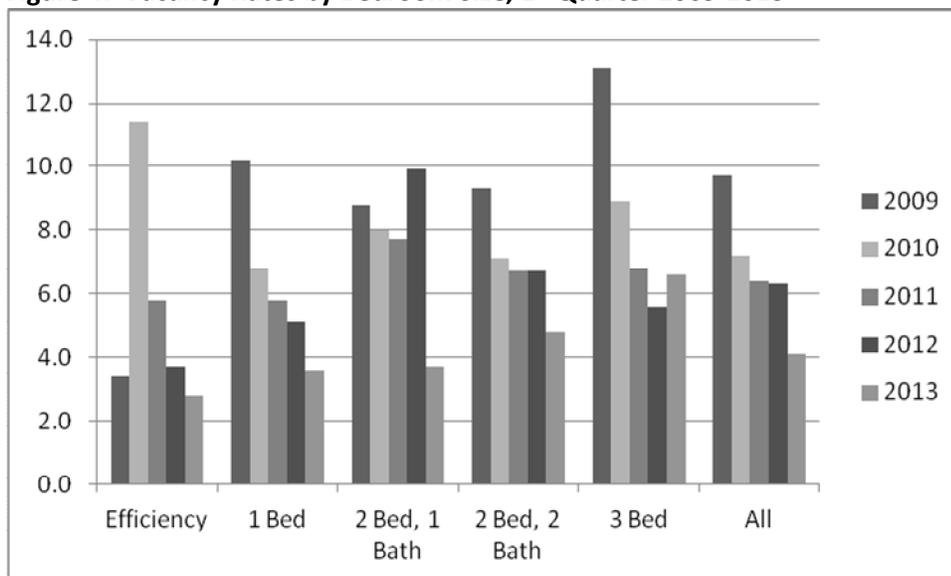
Vacancy rates in Arapahoe County are lowest for smaller units, which are also more affordable. Vacancy rates have declined significantly during the past five years, as demand for rentals has outpaced rental construction throughout the metro Denver area.

Table 30: Vacancy Rates by Bedroom Size, 1st Quarter 2009-2013

	2009	2010	2011	2012	2013
Efficiency	3.4%	11.4%	5.8%	3.7%	2.8%
1 Bed	10.2%	6.8%	5.8%	5.1%	3.6%
2 Bed, 1 Bath	8.8%	8.0%	7.7%	9.9%	3.7%
2 Bed, 2 Bath	9.3%	7.1%	6.7%	6.7%	4.8%
3 Bed	13.1%	8.9%	6.8%	5.6%	6.6%
All	9.7%	7.2%	6.4%	6.3%	4.1%

Source: Apartment Association of Metro Denver Rent and Vacancy Survey, 1st Quarter 2013

Figure 4: Vacancy Rates by Bedroom Size, 1st Quarter 2009-2013



Source: Apartment Association of Metro Denver Rent and Vacancy Survey, 1st Quarter 2013

Median rents have grown an average of 10% during the past five years in Arapahoe County. Increased demand has allowed property owners to charge more for all types of rental housing units.

Table 31: Median Rents by Bedroom Size, 1st Quarter 2009-2013

	2009	2010	2011	2012	2013	% Change
Efficiency	\$520.67	\$478.53	\$531.60	\$554.33	\$580.76	12%
1 Bed	\$698.93	\$696.61	\$728.56	\$740.45	\$781.08	12%
2 Bed, 1 Bath	\$774.87	\$776.51	\$792.67	\$803.43	\$849.53	10%
2 Bed, 2 Bath	\$939.21	\$910.27	\$984.18	\$1,004.74	\$1,062.30	13%
3 Bed	\$1,202.94	\$1,182.00	\$1,235.87	\$1,276.50	\$1,372.33	14%
Other	\$890.44	\$1,126.40	\$1,062.17	\$1,069.48	\$1,190.44	34%
All	\$811.29	\$804.38	\$825.08	\$849.43	\$891.96	10%

Source: Apartment Association of Metro Denver Rent and Vacancy Survey, 1st Quarter 2013

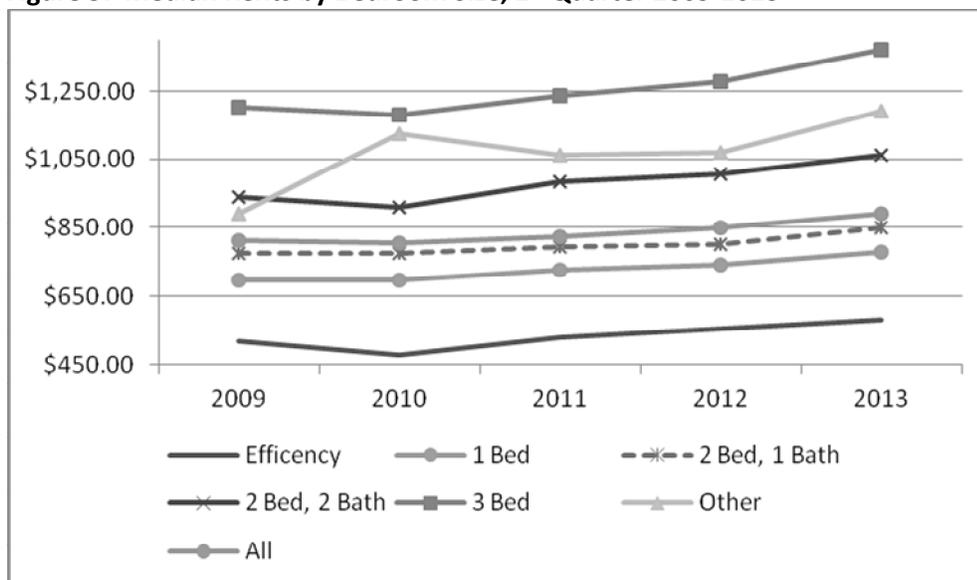
Rents per square foot have increased at a higher pace than rents per unit. Rents per square foot are lower for larger units, and have risen at a slower pace than for smaller units.

Table 32: Average Rents per Square Foot, 1st Quarter 2009-2013

Type	2009	2010	2011	2012	2013	% Change
Efficiency	\$1.15	\$1.15	\$1.19	\$1.31	\$1.39	21%
1 Bed	\$1.04	\$1.04	\$1.06	\$1.11	\$1.15	11%
2 Bed, 1 Bath	\$0.91	\$0.94	\$0.92	\$0.97	\$1.00	10%
2 Bed, 2 Bath	\$0.94	\$0.92	\$0.97	\$1.00	\$1.05	12%
3 Bed	\$0.95	\$0.98	\$1.00	\$1.00	\$1.04	9%
All	\$0.98	\$0.99	\$1.01	\$1.05	\$1.10	12%

Source: Apartment Association of Metro Denver Rent and Vacancy Survey, 1st Quarter 2013

Figure 5: Median Rents by Bedroom Size, 1st Quarter 2009-2013



Source: Apartment Association of Metro Denver Rent and Vacancy Survey, 1st Quarter 2013

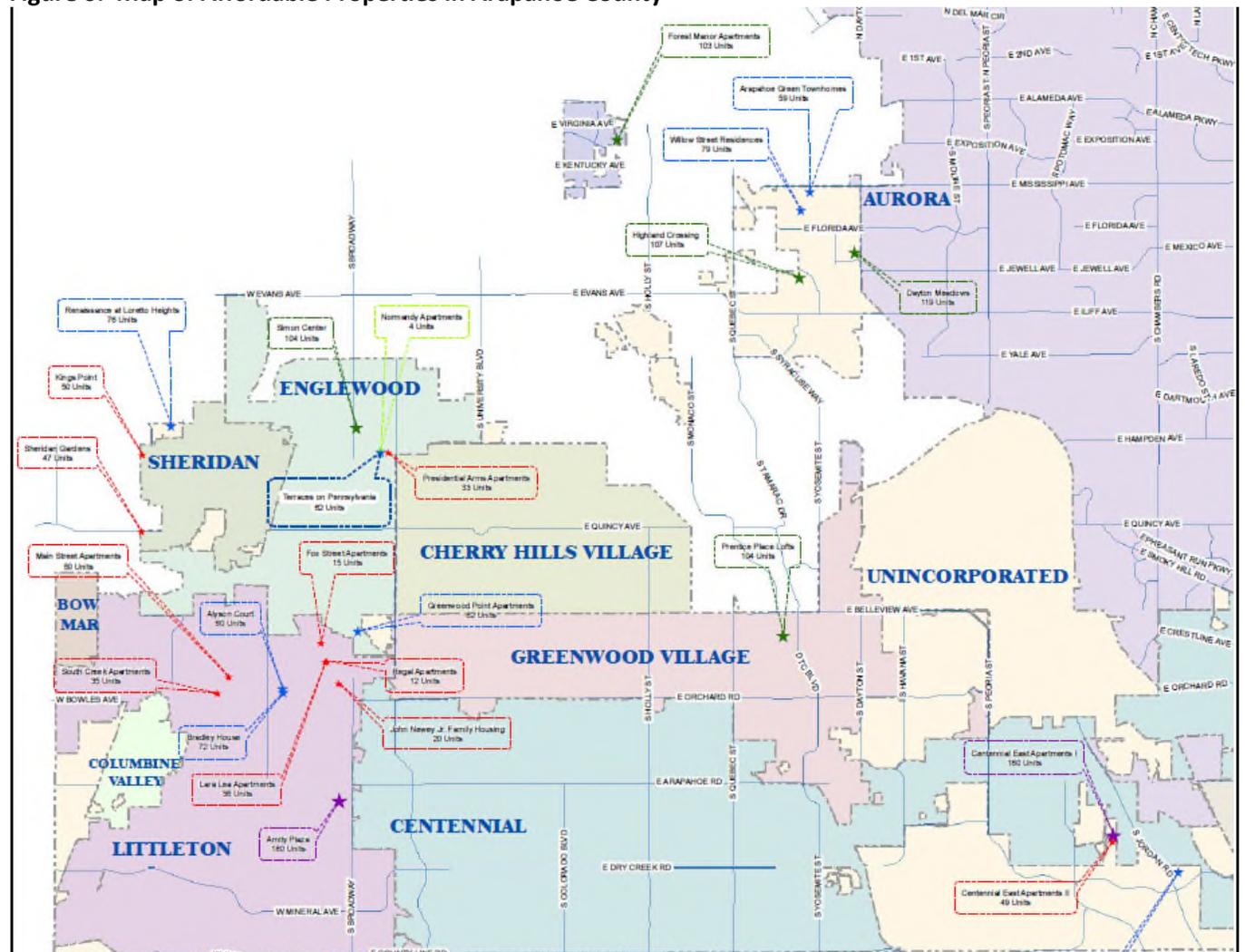
The following table shows the affordable rental inventory currently available in Arapahoe County. Units are owned by housing authorities, nonprofit housing providers, and private owners. CSI found a total of 1,945 affordable units in Arapahoe County. Of these, 855 include tenant based rental assistance. Only 59 are considered accessible to persons with disabilities. Only seven percent (7%) of affordable units in Arapahoe County are targeted to households at 30% AMI. Another 11% are targeted at 40% AMI, 38% at 50% AMI, and 38% at 60% AMI.

Table 33: Affordable Rental Inventory, Arapahoe County Excluding Aurora

Property Name	# of Units	Afford	30% AMI	40% AMI	50% AMI	60% AMI	Acc	RA	Target Population
Alyson Court	60	60	10	0	50	0	6	60	Seniors & PWD
Amity Plaza	180	180	0	0	180	0	17	180	Seniors & PWD
Arapahoe Green Townhomes	60	59	18	1	34	6	6	0	Gen Afford Rental
Bijou Manor	11	11	11	0	0	0	1	11	Seniors & PWD
Bradley House	72	72	0	0	72	0	0	72	Seniors & PWD
Centennial East Apartments I	160	160	0	0	0	160	0	0	Gen Afford Rental
Centennial East Apartments II	80	49	0	32	17	0	0	0	Gen Afford Rental
Dayton Meadows	120	119	0	2	12	95	6	0	Gen Afford Rental
Fox Street Apartments	16	15	0	0	15	0	1	15	PWD -Mental Illness
Forest Manor Apartments	103	103	2	10	14	77	0	103	Gen Afford Rental
Greenwood Point Apartments	312	62	0	0	0	62	0	0	Gen Afford Rental
Highland Crossing	108	107	0	0	0	107	0	0	Gen Afford Rental
John Newey Jr. Family Housing	20	20	0	0	20	0	1	20	Gen Afford Rental
Kings Point	50	50	0	0	0	50	0	50	Seniors
Lara Lea Apartments	36	36	0	19	15	2	0	0	Gen Afford Rental
Main Street Apartments	50	50	0	8	42	0	0	0	Gen Afford Rental
Orchard Place Assisted Living	100	100	75	25	0	0	15	100	Seniors & PWD
Prentice Place Lofts	104	104	0	24	80	0	0	0	Gen Afford Rental
Presidential Arms Apartments	33	33	7	0	12	14	0	0	Gen Afford Rental
Regal Apartments	12	12	0	0	0	12	0	0	Gen Afford Rental
Renaissance at Loretto Heights	76	76	0	47	8	21	0	22	Gen Afford/Transitional
Reserve at South Creek	168	69	0	0	0	69	0	0	Gen Afford Rental
Sheridan Gardens	48	47	0	0	0	47	6	47	Gen Afford Rental
Simon Center	105	104	0	0	0	0	0	104	Seniors & PWD
South Creek Apartments	36	35	0	0	35	0	0	0	Gen Afford Rental
South Metro Housing Solutions	71	71	0	0	71	0	0	71	Gen Afford Rental
Terraces on Pennsylvania	62	62	0	24	38	0	0	0	Seniors
Willow Street Residences	80	79	16	24	21	18	0	0	Gen Afford Rental
	2,333	1,945	139	216	736	740	59	855	
Percent of Affordable Units			7%	11%	38%	38%	3%	44%	

Source: CSI * Acc = accessible, RA = units including rental assistance

Figure 6: Map of Affordable Properties in Arapahoe County



Source: CSI, Arapahoe County GIS, (see Appendix C for larger map)

The following table shows the 2013 HUD HOME and Fair Market Rent limits for the Denver-Aurora-Broomfield MSA, which includes Arapahoe County. Owners of affordable properties must meet these rent guidelines, and Section 8 voucher holders must find units at or below the Fair Market Rents, which is becoming a challenge, according to the local housing authorities and non-profit housing providers.

Table 34: HUD Rent Limits 2013

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	\$588	\$726	\$940	\$1,379	\$1,599
High HOME Rent	\$661	\$773	\$985	\$1,307	\$1,438
Low HOME Rent	\$661	\$744	\$892	\$1,031	\$1,150

Source: HUD CPD

HOMEOWNERSHIP PROFILE

CSI used current Multi-list listings and information from Metro List to prepare an analysis of the sales market in Arapahoe County, excluding Aurora. Prices have been increasing in Arapahoe County as the sales market recovers from the recession of the past five years. Low interest rates and lack of units on the market have caused prices to rise in Arapahoe County.

In April of 2013, there were 817 single family homes and 257 condos and townhomes on the market in Arapahoe County. Of these, 169 single family homes and 107 condos or townhomes were affordable at \$410,000 or below, within the FHA lending guidelines maximum price.

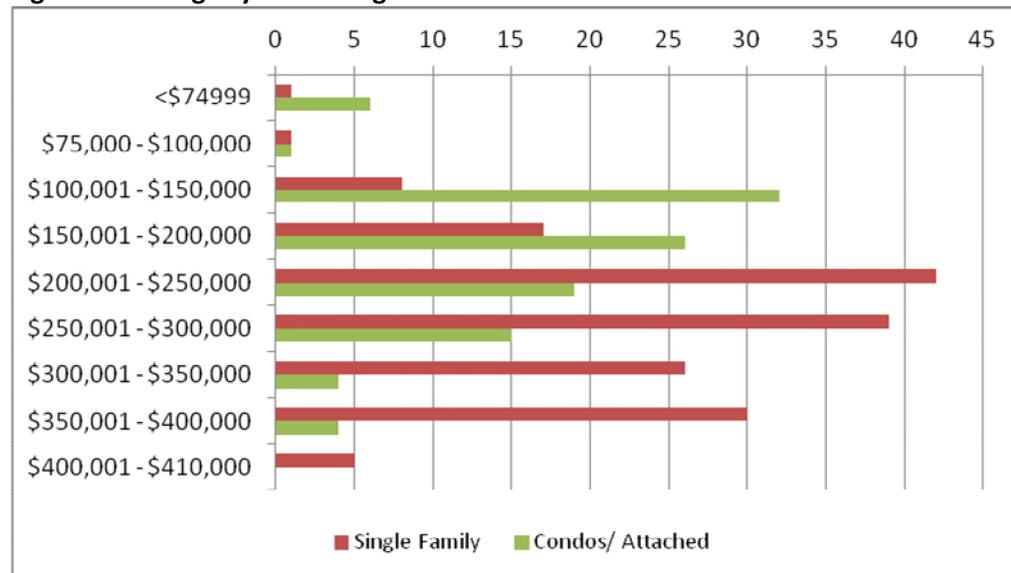
The following table shows the number of listings at or below \$410,000 in Arapahoe County in April of 2013 by price range and type of unit. Attached housing is much more affordable than single family homes. The majority of single family listings are priced between \$200,000 and \$400,000. Condo units are concentrated in the \$100,000 - \$300,000 price range.

Table 35: Listings by Price Range, April 2013

	Single Family	Condos/ Attached	% of Total
<\$74999	1	6	2.5%
\$75,000 - \$100,000	1	1	0.7%
\$100,001 - \$150,000	8	32	14.5%
\$150,001 - \$200,000	17	26	15.6%
\$200,001 - \$250,000	42	19	22.1%
\$250,001 - \$300,000	39	15	19.6%
\$300,001 - \$350,000	26	4	10.9%
\$350,001 - \$400,000	30	4	12.3%

Source: MLS, CSI

Figure 7: Listings by Price Range



Source: MLS, CSI

While condo and townhome prices are lower than prices for single family homes, the units are also smaller and have less bedrooms, bathrooms, and garage spaces. On average, attached units are newer than single family homes, and also stay on the market for shorter times.

Table 36: Current Listings Details

	Avg Bdrms	Avg Baths	Avg S.F.	Avg Garage Spaces	Avg Year Built	Avg Days on Market	Avg Price Per sf
Single Family	3	4	2,517	3	1982	170	\$96
Condos/Attached	2	2	1,234	2	1990	53	\$150

Source: MLS, CSI

The inventory of homes for sale in Arapahoe County has declined during the past year, as has the days that homes stay on the market. Active listings declined by almost 35% between March of 2012 and March of 2013. The median price of a home rose 20.1% during the same time period from \$186,875 to \$224,500. Homes sold for 99.3% of asking prices in March of 2013, up 1.3% from a year before.

Table 37: Sales Data and Changes, 2012 - 2013

	March-12	March-13	Change	YTD '12	YTD '13	Change
Active Listings	1,644	1,072	-34.8%			
Pending Listings	492	380	-22.8%			
Under Contract Listings	1,042	1,149	10.3%	2,598	3,052	17.5%
Sold	717	895	24.8%	1,763	2,156	22.2%
Total Days on Market	90	61	-31.9%	94	66	-29.1%
Median Sold Price	\$186,875	\$224,500	20.1%	\$174,915	\$212,000	21.2%
Average Sold Price	\$243,438	\$280,421	13.2%	\$227,915	\$257,892	13.2%
Percent of Sold Price to Listing Price	98.0%	99.3%	1.3%	97.9%	99.1%	1.3%

Source: Metrolist

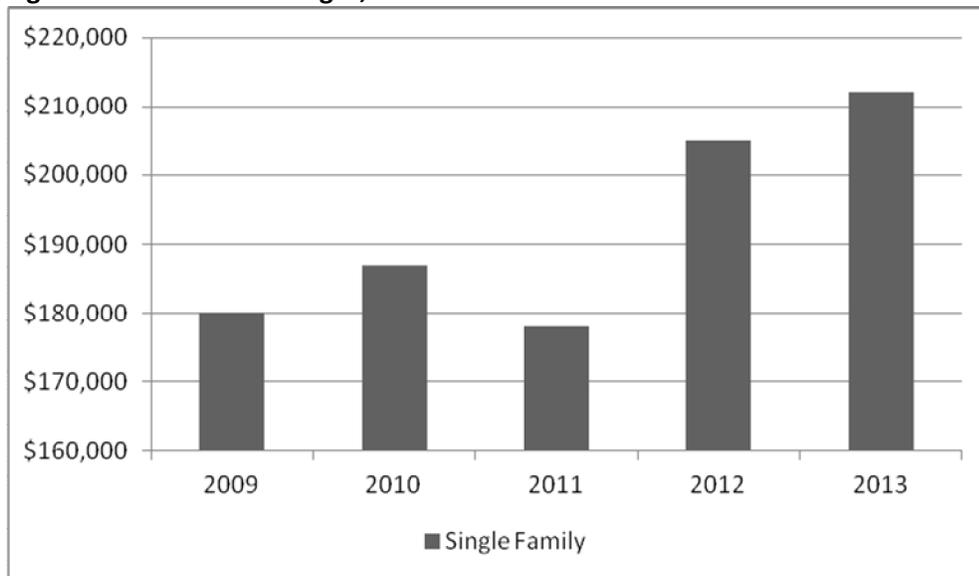
Sales prices in Arapahoe County grew 14% between 2009 and 2012, and have increased another 3.4% since the end of 2012. The number of units sold in Arapahoe County also rose during this time period.

Table 38: Sales Price Changes 2009 - 2012

2009		2010		2011		2012	
# Sold	Median Price	# Sold	Median Price	# Sold	Median Price	# Sold	Median Price
8,708	\$180,000	7,995	\$187,000	8,669	\$178,000	9,365	\$205,000

Source: Metrolist

Figure 8: Sales Price Changes, 2009 –March 2013



Source: Metrolist

Since 2008, there have been permits let for 841 new single family homes in Arapahoe County, and 49 multi-family properties. Units have been constructed, for the most part, in the unincorporated areas of the county and in Centennial. While the City of Glendale was contacted for permit data, no new permits have been issued in Glendale since 2007. Permit numbers have not increased substantially from year to year during this time period. As the home sales market picks up and inventory of existing units declines, developers will be more likely to begin constructing new housing units again.

Table 39: Building Permits over Time, Arapahoe County

Year	Unincorp.		Centennial		Englewood		Littleton		Sheridan		Greenwood Village		Total	
	SF	MF	SF	MF	SF	MF	SF	MF	SF	MF	SF	MF	SF	MF
2012	140	6	29	0	6	0	7	1	0	0	9	0	191	7
2011	71	0	14	0	7	0	3	1	2	0	9	0	106	1
2010	141	4	35	0	7	0	2	0	0	0	19	0	204	4
2009	78	16	23	0	9	0	5	0	2	0	15	0	132	16
2008	106	8	60	1	6	0	10	1	2	11	24	0	208	21

Source: CSI

Foreclosures have declined dramatically in Arapahoe County in the past few years. The Colorado Division of Housing tracks foreclosures by county in the state. In 2013 through May, there were 874 foreclosure filings in Arapahoe County, a reduction of 46.4% from the prior year. There were 536 foreclosure sales in the county through May of 2013, a reduction of 31.4% from the prior year. Arapahoe County data shows that foreclosure sales were down 53% between 2011 and 2013.

Table 40: Foreclosures in Arapahoe County Over Time

Year	Total # of Foreclosures Filed	# of Foreclosures Cured	# of Confirmation Deeds issued the PT's Office
2012	3,589	163	1,838
2011	3,961	180	2,804
2010	5,502	227	3,101
2009	6,244	114	2,680
2008	5,882	95	4,333

Source: Arapahoe County

Zillow.com reports that foreclosure resales are down across the county, by an average of 10% between May of 2012 and May of 2013. Foreclosures still sell for less than listings that are not foreclosures. According to RealtyTrac, the median foreclosure resale price in Arapahoe County was 27% less than other sales in May of 2013.

The foreclosure crisis has had a very significant impact on the housing market in the US, and in Arapahoe County. However, it seems that the housing market in Arapahoe County is recovering, that less units are falling into foreclosure, less foreclosed and bank owned properties are on the market, and that increases in values and prices should keep many owners from losing their homes.

AFFORDABLE HOUSING NEEDS

The 2013 HUD median income in the Denver metro MSA is \$77,800. The following table shows the 2013 income ranges by area median income limits. Incomes in each range vary depending upon the number of persons in a household.

Table 41: HUD AMI Levels 2013, Denver Broomfield MSA

	Income Range
0-30% AMI	\$0 - \$16,350
31-50 AMI	\$16,351-\$38,900
51-80 AMI	\$38,901 - \$62,250
81-100 AMI	\$62,251 - \$77,800
100% AMI and Greater	> \$77,800

Source: HUD CPD Department

CSI has estimated the number of households by AMI level for each municipality in Arapahoe County in 2013. As was stated earlier in this report, county-wide (excluding Aurora), forty-six percent (46%) of all Arapahoe County households have incomes at or below 80% of the median income for the county, or below an income of \$62,240.

Table 42: Incomes by Municipality and AMI level, 2013

% AMI (2013)	Arapahoe County	Arapahoe County excluding Aurora	Bennett (part)	Bow Mar (part)	Centennial
0 to 30%	25,122	10,915	0	3	1,666
31 to 50 %	45,492	19,946	4	20	4,161
51 to 80%	43,107	19,912	10	16	6,251
81 to 100%	24,934	12,044	8	8	4,452
Over 100%	80,255	48,638	73	164	20,976
% AMI (2013)	Cherry Hills Village	Columbine Valley	Deer Trail	Englewood	Foxfield
0 to 30%	59	11	55	2,348	14
31 to 50 %	51	34	25	4,085	27
51 to 80%	90	60	27	3,277	39
81 to 100%	66	48	12	1,697	21
Over 100%	1,732	360	54	3,061	155
% AMI (2013)	Glendale	Greenwood Village	Littleton (part)	Sheridan	Unincorp
0 to 30%	649	334	2,395	429	2,952
31 to 50 %	721	689	4,071	883	5,175
51 to 80%	531	631	3,186	501	5,292
81 to 100%	164	344	1,808	225	3,191
Over 100%	345	3,386	5,664	254	12,413

Source: American Community Survey and CSI

The following table breaks down the number of households in Arapahoe County (excluding Aurora) by HUD AMI level and tenure.

Table 43: Households by AMI and Tenure, 2013

% AMI	Owners	%	Renters	%
0 to 30%	3,155	4.1%	7,760	22.3%
31 to 50 %	8,613	11.2%	11,333	32.5%
51 to 80%	12,241	16.0%	7,671	22.0%
81 to 100%	8,683	11.3%	3,361	9.6%
Over 100%	43,887	57.3%	4,751	13.6%

Source: American Community Survey and CSI

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

Owner households with incomes at or below 80% of the area median income can often have a hard time keeping up with maintenance of their homes after paying a mortgage, taxes, and insurance. These households are candidates for homeowner rehabilitation programs. In Arapahoe County, there are an estimated 24,009 owners with incomes at or below 80% of the area median income.

Renter households with incomes at or below 30 percent AMI often need deeply subsidized rental housing, either with extremely low rents or a rental assistance voucher. There is a shortage of housing affordable to these households. In Arapahoe County, there are 7,760 renter households with these low incomes. This number is much higher than the number of rent assisted housing units or rental assistance vouchers available to this population.

AVAILABILITY OF ACCESSIBLE HOUSING

Arapahoe County Housing Authorities have some fully accessible rental units in the affordable housing stock, though much of the older rental housing stock is not accessible. CSI counted 59 fully accessible housing units in rent restricted properties. Newer units funded by the HOME program must provide 5% accessible units. Considering the number of households with disabilities, and those with disabilities living in poverty, this number is insignificant to address the need for fully accessible housing units.

MAPS

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

- Map #1 -- Areas of Minority Concentrations
- Map #2 -- Areas with Low Income Concentrations
- Map #3 -- Group Home Locations
- Map #4 -- Location of Rent Restricted Rental Units

SECTION THREE: EVALUATION OF FAIR HOUSING LEGAL STATUS

FAIR HOUSING COMPLAINTS:

EVALUATION OF JURISDICTION’S CURRENT FAIR HOUSING STATUS

Arapahoe County residents filed 76 complaints with HUD between 2008 and 2012. These 76 complaints documented 124 various complaint issues. The most frequently listed reason for discrimination was Race (44% of all reasons), with almost all of the racial discrimination cases alleging discrimination against African American residents. Physical disability was the second biggest reason at 37% of all reasons. The top violations that the complaints alleged included discrimination in terms, conditions, privileges or services and facilities (19%) and failure to make reasonable accommodation (17%).

Sixty-five percent of the complaints were found to have no cause and dismissed by HUD. In 17% of cases, a resolution was found and the case was withdrawn. Complaints occurred most often in Aurora (60%), followed by Littleton (14%) and Englewood (8%).

Table 44: Summary of HUD Complaints, 2008-2012

	2008	2009	2010	2011	2012	Total
Number of Cases:	15	15	20	17	9	76
Number of Complaint Issues:	18	29	28	26	23	124
Most Common Protected Class Affected:	Physical Disability	Physical	African American	African American	Physical Disability	
Most Common Alleged Violation:	Failure to make reasonable modification	Discriminatory acts under Section 818	Failure to make reasonable modification/ Discriminatory terms, conditions, privileges or services and facilities	Discriminatory acts under Section 818	Discriminatory terms, conditions, privileges; Discriminatory acts under Section 818	
Most Common Resolution	No cause determination	No cause determination	No cause determination	No cause determination	No cause determination	

Source: HUD Office of Fair Housing

Arapahoe County residents filed 130 complaints with the Colorado Civil Rights Division between 2008 and 2012, covering 187 different complaint issues. The most frequently listed reason for discrimination was Race (42% of all reasons), with the majority of the racial discrimination cases alleging discrimination against African American residents. Physical or mental disability was the second biggest reason at 27% of all reasons.

Seventy-one percent of the complaints were found to have no probable cause and the case was deemed closed. In 21% of cases, the complaint was withdrawn without settlement.

Table 45: Summary of Fair Housing Complaints to the Colorado Civil Rights Division, 2008-2012

	2008	2009	2010	2011	2012	Total
Number of Cases:	29	31	25	27	18	130
Number of Complaint Issues:	41	38	42	41	25	187
Most Common Basis of Complaint:	Race/Color/Origin (49%)	Race/Color/Origin (53%)	Race/Color/Origin (43%)	Race/Color/Origin (34%)	Race/Color/Origin (28%)	
Most Common Resolution	No probable cause					

IDENTIFICATION OF FAIR HOUSING CONCERNS OR PROBLEMS

Impediments to fair housing choice include any action, omission or decision taken because of race, color, religion, sex, disability, familial status, or national origin that may restrict housing choices or the availability of housing choices. This section addresses housing problems related to discriminatory and illegal practices, as well as general and specific local housing concerns that may occur. The discriminatory and illegal practices listed below are examples and definitions of the kinds of discrimination that could occur in a community with respect to housing, which are considered illegal under the provisions of the Fair Housing Act and are not intended to imply that these practices are occurring in a community.

1. DISCRIMINATORY AND ILLEGAL PRACTICES

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

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

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

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

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

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

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

Many of the above described discriminatory practices may occur unknowingly. When discrimination occurs in the area of housing, it encourages segregated living patterns and housing markets. These

discriminatory practices are often difficult to see and document. Those who have been discriminated against must bring charges of housing discrimination to the attention of local, state or federal authorities in order to detect and enforce against such illegal practices.

2. GENERAL HOUSING CONCERNS/PREFERENCES

Arapahoe County residents are served by four housing authorities, operated by two of the housing authorities. The Englewood Housing Authority is administratively housed in Englewood. The Authority administers 398 Section 8 (Housing Choice) vouchers that may be used in the City of Englewood and 177 in the City of Sheridan. The Authority owns and operates 10 scattered site public housing units and a 100 unit public housing senior complex. The Authority owns another 104 unit affordable property, primarily housing seniors. The Englewood Housing Authority accepts applications for housing assistance on a time and date of application, first come-first served basis. New waiting list applications are taken at the offices of the Housing Authority.

South Metro Housing Options, formerly the Littleton Housing Authority, administers 338 vouchers that can be used in the City of Littleton, as well as 62 vouchers for Arapahoe County that can be used county-wide. South Metro also owns and operates 143 scattered public housing units, a 180 unit property of one bedroom units, a 71 unit property for seniors, a 28 unit property targeting seniors, and a 111 unit assisted living facility.

Housing Authority applicant waiting lists for Section 8 tenant-based assistance as of May 2013 contain the following numbers. Waiting lists are closed except for the Arapahoe County section 8 voucher waiting list.

Table 46: Housing Authority Waiting Lists, May 2013

Housing Authority	# of Section 8 Vouchers	Voucher Priorities	Waiting List Open/Closed & Date	# on Waiting List	Wait List Income Levels	Wait List Household Type	
South Metro Housing Options	SMHO - 288	PWD	Closed, 12/15/2012	2302	Extremely Low - 2124	Family - 1315	
					None/Other - 87	Elderly - 187	
						PWD - 509	
						Other - 290	
Arap. Co. - 62 State of CO - 50	PWD	PWD	No waiting list	0			
					Closed, 12/2008	Extremely Low - 141	Family - 104
						None/Other - 8	Elderly - 3
							PWD - 6
						Other - 36	
Englewood HA	393	None	Closed, 5/13/2012	2497	Extremely Low - 2280	Family - 1409	
					Very Low - 1097	PWD - 575	
					Low - 12		
Sheridan HA	177	Live/work in Sheridan	Closed, 6/30/2011	1951	Extremely Low - 1802	Family - 1162	
		Elderly or PWD			Very Low - 141	PWD - 412	
		Family displaced			Low - 3		
Totals	1,142			6,899			

The list is purged only when attempts are made to contact an applicant at the top of the list and they do not respond. Waiting lists are so long that they often are closed for multiple years. The majority of

households on the waiting lists are extremely low income, and the highest numbers are families. South Metro Housing Options gives priority to persons with disabilities. Englewood does not have priorities, and the Sheridan Housing Authority program gives priority to households who live and work in Sheridan, the elderly and persons with disabilities, and displaced families.

EXPIRING HOUSING ASSISTANCE CONTRACTS

In the earlier years of the current decade, HUD began a process of limiting the number of Section 8 project renewal contracts. Following the urging of Congress, and with the passage of subsequent budget increases, more Section 8 units are remaining in the affordable inventory. For the past several years, market conditions in the Metro area have made it advantageous for multi-family owners to renew their Section 8 contract rather than convert the buildings to some other use. Because the HUD renewals are being handled on a one-to-three year basis, as the Arapahoe County multifamily housing market improves property owners may terminate their Section 8 project contract renewals and convert their buildings to some other use. Presently, there are no known expiring Section 8 contract units that will be removed from the affordable housing inventory in Arapahoe County.

SPECIFIC HOUSING CONCERNS

HOUSING NEEDS OF PERSONS WITH DISABILITIES

There are many agencies that serve persons with special needs in Arapahoe County. These groups include the elderly, persons with mental, physical, and developmental disabilities, persons with HIV/AIDS, and persons with alcohol or drug addictions. While many people with disabilities do not need assistance or modified or service enriched housing, others do. Individuals with disabilities may have limited ability to work and earn a living, requiring them to live on Social Security Disability. They may also require modified housing units, service enriched housing with assistance, or a group quarter or assisted living environment.

The US Census American Community Survey collects data related to disability status. For 2009 – 2011, this data is not available at the municipal level, therefore the following table does include Aurora. In Arapahoe County, 8.8% of the population, or just under 50,000 people, had a disability between 2009 and 2011. Persons may have more than one self reported disability. The most common disabilities were ambulatory difficulty, cognitive difficulty, and difficulty with independent living. These disabilities can all require service enriched or modified housing units.

Table 47: Disability Status (ALL of Arapahoe County)

	%	Number
Disability	8.8%	49,906
Hearing difficulty	2.6%	15,055
Vision difficulty	1.7%	9,479
Cognitive difficulty	3.2%	18,222
Ambulatory difficulty	4.1%	23,575
Self-care difficulty	1.6%	9,309
Independent living difficulty	3.0%	17,165

Source: US Census Bureau, American Community Survey 2009-2011

In Arapahoe County, there are nonprofit organizations that specialize in serving persons with mental illness, developmental disabilities, the frail elderly, and persons with substance abuse issues. None of these agencies has a total count of persons in Arapahoe County with the disability that they serve.

The Community Housing Development Association (CHDA) is a CHDO that serves households in Arapahoe County with special needs. The nonprofit housing developer was established through a collaborative partnership between Arapahoe House (substance abuse), Developmental Pathways (developmental disabilities), and Arapahoe/Douglas Mental Health Network (mental health issues). The CHDO develops new units and purchases existing properties with affordable rents, and sets aside 20% of units at each property for clients from each special needs agency. Currently, CHDA owns and operates 204 affordable rental units. While units are targeted for partner agencies, they are also leased on a first come first serve basis.

Each of these three agencies also runs their own housing programs. Arapahoe House has 72 Section 8 vouchers, 4 Shelter Plus Care vouchers for veterans, and 23 transitional housing units. There is a two year waiting list for their housing subsidies. Arapahoe Housing staff indicates that their clients have barriers due to the cost of rental housing in Arapahoe County, as well as transportation access and cost issues. Voucher holders have problems finding units that fit the FMR limit, especially as housing costs continue to increase in Arapahoe County.

Developmental Pathways serves individuals with developmental disabilities. The agency operates 10 group homes in Arapahoe and Douglas Counties, have 45 residents living with host home providers, and own four three apartment complexes where individuals live and are supported by agency staff. The agency provides case management to clients who receive Section 8 rental assistance vouchers through the local housing authorities. Staff notes that accessibility can be a barrier for their clients, as well as declines in services that their residents' access which help them remain independent. Developmental Pathways has 2,300 people on their waiting list for housing. They plan to move more individuals to host homes in the future, and are phasing out group homes, which are costlier to operate. State group home data shows a total of 108 beds available to persons with developmental disabilities and 21 beds for intermediately intellectually disabled persons in Arapahoe County.

Arapahoe-Douglas Mental Health Center serves all areas of Arapahoe and Douglas Counties except the City of Aurora which is served by Aurora Mental Health. The Mental Health Center provides a broad menu of mental health services. Arapahoe Douglas Mental Health also receives funds from the County to support their services. Arapahoe Douglas Mental Health Center also has limited affordable housing resources for clients who are receiving services from the agency. The Mental Health center owns two affordable properties. One 12 unit complex is in Aurora and the other 16 unit property is located in Englewood. Neither of these properties have attached rental assistance vouchers. The Center owns two small HUD SEC. 202 properties. Each property is 12 units and between the two locations, there are 6 vouchers that can be used by residents in those properties. The agency administers 110 Housing Choice Vouchers and 17 Shelter Plus Care Vouchers. The waiting list currently has 35 updated applicants. The wait list has not been opened since 2009. Because of the Federal Budget Sequestration, Arapahoe-Douglas Mental Health Center has not issued a new voucher since January 1, 2013.

While Arapahoe-Douglas Mental Health Center is the primary mental health service agency for the unincorporated areas of the County and for the Arapahoe County municipalities except Aurora, the Aurora Mental Health Center does provide services to County residents. The Aurora Mental Health Center receives funding from Arapahoe County to support their service activities. In addition to providing the full array of mental health services, Aurora Mental Health also provides housing assistance to clients it serves. Aurora Mental Health administers 154 Housing Choice Vouchers originating from a variety of sources including the State of Colorado and some HUD supportive housing programs. The Mental Health Center also administers 24 project based vouchers that are attached to a 24 unit deed restricted affordable apartment complex. Aurora Mental Health Center does not manage its own

waiting list due to a prior arrangement with the Colorado Department of Human Services. Under that arrangement, a statewide list is maintained and names on the list are identified by County of origin. The Mental Health Center estimates that there is a five year wait for vouchers issued to eligible households on the waiting list. The waiting list hasn't been opened in five years.

The Colorado AIDS Project provides housing and assistance to persons with AIDS throughout the state and within the metro Denver area. The agency reports that there are 11,000 people living with AIDS in Colorado. There are two housing projects dedicated to persons with AIDS in the metro area which are located in Denver, Dave's Place and the Juan Diego. The agency also provides rental assistance vouchers. In 2010, the last reported period, the agency served 151 persons with housing subsidy, and a total of 2,216 with case management, nutrition services, counseling, and case management. There are no HIV/AIDS specific programs targeted to residents of Arapahoe County, but residents can access services through the Colorado AIDS project.

The HERO Alliance is a nonprofit agency that assists persons with disabilities to become homeowners in the metro Denver area. The agency will provide homebuyer counseling and credit repair to disabled persons who use Section 8 rental assistance to purchase a home. Currently, there are no housing authorities in Arapahoe County that offer a Section 8 homeownership option, and so the HERO alliance is not working with any residents of Arapahoe County. While the agency can refer clients to Funding Partners, the administrator of Arapahoe County downpayment assistance, most of their clients need the deep subsidy of a voucher to make homeownership a viable option.

The Colorado Center for the Blind is located in Arapahoe County. The center provides training for blind adults and children, including short-term housing and independent living training for adults. The center serves residents from throughout Colorado.

Providers interviewed note that a lack of accessible units, and affordable units are the biggest barriers their clients face.

HOUSING NEEDS FOR THE HOMELESS

CSI interviewed all homeless providers serving Arapahoe County to prepare this analysis of homeless needs within the county. The Metro Denver Homeless Initiative Continuum of Care conducts a one night Point-in-Time count of homelessness in Arapahoe County. None of the agencies involved, however, estimates the total number of households and individuals experiencing or becoming homeless in each year, existing homeless, or counts the number of days persons experience homelessness. Some related data is collected through the MDHI Point-in-Time (PIT), which is included below. These numbers include homeless in Aurora.

In January of 2013, there were a total of 802 homeless persons counted in Arapahoe County. The following table breaks these individuals into HUD required categories. The PIT tabulates sheltered and unsheltered, but does not break this information down into sub-population categories. CSI estimated sheltered and unsheltered based upon the total ratio of unsheltered individuals (8%) to sheltered individuals (92%) for this table. In reality, some groups are more likely to be unsheltered than others. CSI also estimated the total number of persons experiencing homelessness each year by multiplying those homeless on a given night by 1.5, as 50% of those counted had been homeless for less than 12 months.

Seventy percent (70%) of homeless counted in Arapahoe County in 2013 were persons with individuals and children. Thirty percent were persons in households with only adults. Of the 6,358 individuals

experiencing homelessness each year in the metro Denver area, 58% are persons in households with adults and children.

Table 48: NA-40 Homeless Needs

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year
	Sheltered	Unsheltered	
Persons in Households with Adult(s) and Child(ren)	516	45	842
Persons in Households with Only Children	0	0	0
Persons in Households with Only Adults	223	19	363
Chronically Homeless Individuals	17	2	29
Chronically Homeless Families	0	0	0
Veterans	24	2	39
Unaccompanied Child	0	0	0
Persons with HIV	6	1	11

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

There are few chronically homeless in Arapahoe County. The PIT counted 19 chronically homeless individuals throughout the county. The PIT also counted 201 newly homeless persons. Twenty-nine percent of homeless persons who were counted were working.

There are a higher percentage of minorities in Arapahoe County's homeless population than within the population as a whole. Only 45% of the homeless counted in 2013 were white. Thirty-three percent (33%) were African American, and 2.5% were Native American. Thirteen percent (13%) were Hispanic.

Table 49: Race and Ethnicity, Point-in-Time 2013

	Percent
Asian, Pacific Islander	0.3%
Black, African American	32.6%
Hispanic, Latino(a), Spanish	12.9%
Native American, Alaska	2.5%
White	44.9%
Mixed race	6.5%
Other	0.3%
Total	100.0%

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

Forty percent (40%) of the homeless persons counted in the PIT have been homeless for more than one month and less than one year. Another 28% have been homeless from one to three years, and 6% have been homeless for more than three years. Only 10% have been homeless for less than one month.

Table 50: Duration of Homelessness, Point-in-Time 2013

	Percent
I am not homeless now	15.9%
Less than 1 month	10.2%
More than 1 month but less than 1 year	39.9%
1 to 3 years	27.8%
More than 3 years	6.2%
Total	100.0%

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

Forty-five percent (45%) of homeless have been homeless only one time, according to the count. Another 26% have been homeless two or three times. Households that have instable housing costs or conditions are most likely to experience homelessness multiple times, as are those with untreated medical or substance abuse issues, and those with few job skills.

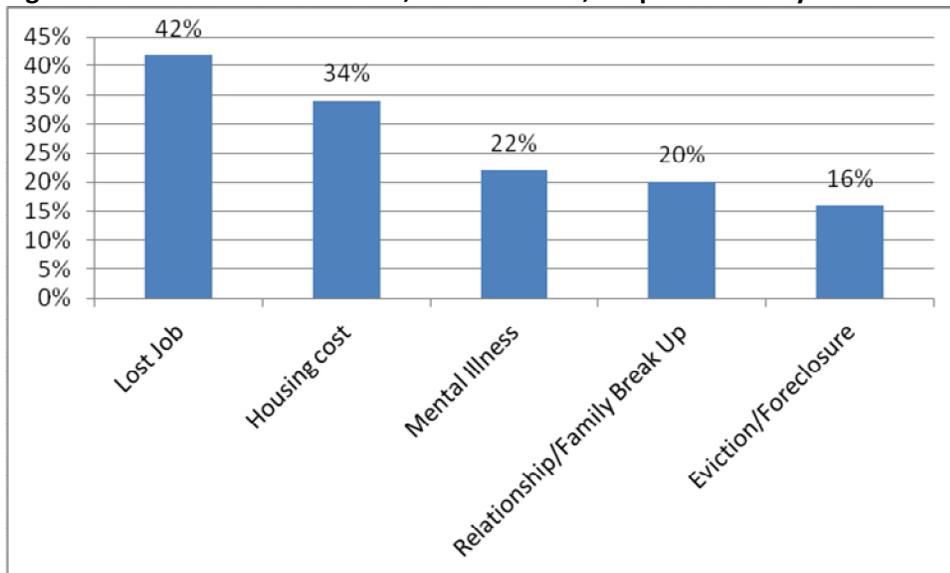
Table 51: Homeless Episodes, Point-in-Time, 2013

	Percent
One	44.5%
Two	19.0%
Three	17.1%
Four	5.0%
Five or more	7.8%
Not homeless any time last 3 years	6.4%
Total	100.0

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

The leading causes of homelessness in Arapahoe County, according to respondents, were lost jobs, housing costs, mental illness, family problems, and evictions or foreclosures. There were 110 individuals who were homeless because of domestic violence issues.

Figure 9: Cause of Homelessness, Point-in-Time, Arapahoe County 2013



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

Homeless and housing providers interviewed for this study report an increase in the number of homeless households in Arapahoe County, especially families with children. Households seeking homeless prevention services are also on the rise, and resources to meet the needs of these households are not adequate to meet all needs. Community Housing Services reports a 10% increase each year in requests for housing services. All homeless providers cited a lack of affordable rental housing units for very low income households and for those who have experienced bad credit as a need. The recent increases in rental prices and reduction in vacancy rate is only increasing this problem.

Gateway Battered Women's shelter provides shelter and services for victims of domestic violence. The agency operates a 24 bed facility in Aurora and a 15 bed facility in west Arapahoe County near Englewood. The occupancy rate at these shelters runs between 85 – 95% each night. Often the facilities are full and individuals are turned away. Requests for shelter are rising. Gateway provided 500 more nights of shelter in 2011 than in 2010. In 2012, they provided 150 more nights of shelter than in 2011. Aurora's Rapid Re-housing program helped many access permanent housing, and Gateway has relationships with other housing providers that enable 73% of individuals served to access housing when they leave.

House of Hope, a service of Family Tree, operates the only emergency homeless shelter in Arapahoe County, excluding Aurora. The facility can house 30 people at a time. Between July 2012 and June 2013, they provided 631 nights of shelter, and served 1,302 people. The shelter always has a waiting list for beds, and the list grows each year. Family Promise serves homeless families in Arapahoe County and throughout the metro Denver area, moving households between churches in the Denver area. The agency can serve five families, or up to 14 individuals, at a time. Households can stay for 60 days. The agency provided 840 shelter nights in Arapahoe County in 2012, serving 30 families from Arapahoe County and 45 from other metro Denver counties. Demand for these beds always exceeds the number of people that they can serve.

Family Promise, Family Tree, and Interfaith Community Services all provide emergency housing assistance as well as shelter or hotel vouchers. The support includes rent and mortgage assistance. Demand for these programs has increased during the past few years. A tight rental market has squeezed many very low and low income households out of lower prices units, making it harder to afford or find rentals in Arapahoe County.

There are some transitional housing opportunities in Arapahoe County. The Colorado Coalition for the Homeless operates 20 transitional housing units in Arapahoe County that have case management services provided by Interfaith Community Services. Community Housing Services has 10 vouchers to provide transitional housing in scattered site units. Homeless agencies interviewed for this study indicate a need for many more transitional housing units in Arapahoe County, as well as more permanent units targeted to the very lowest income households.

None of the homeless in Arapahoe County were counted in rural areas. If households living in rural Arapahoe County experience homelessness, they are seeking services in the urban areas of the County.

HOUSING NEEDS FOR SENIORS

Arapahoe County is projected to experience a steady increase in seniors. In 2000, Arapahoe County was home to nearly 23,800 residents over the age of 65; in 2007 the senior population had grown to almost 31,500 residents; by 2015 this number will increase to over 41,000 (a 74% increase). The 2005 American Communities Survey estimates that 1,592 seniors over the age of 65 are living in poverty, equaling 5.4%

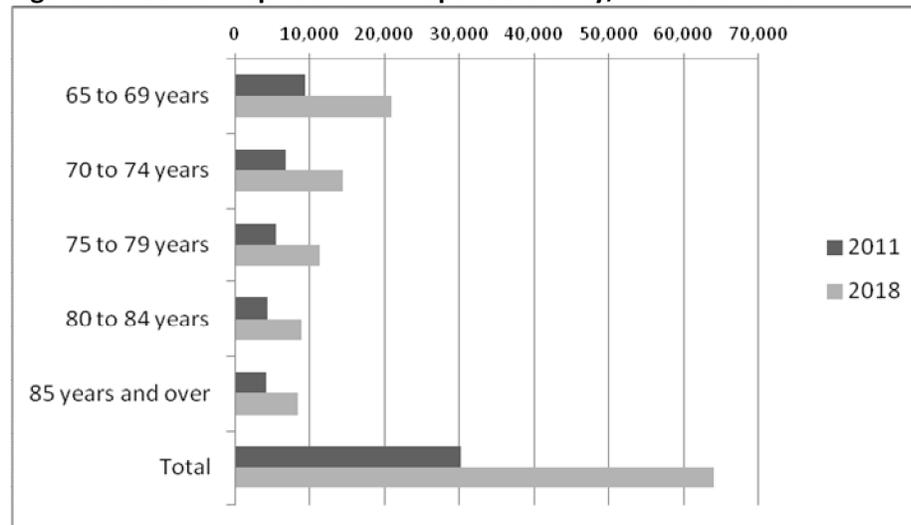
of the total senior population. This data identifies 11,023 seniors with a disability, representing 37.5% of the total senior population in the county.

Table 52: Senior Population Growth in Arapahoe County, 2011 and 2018

	2011	2018
65 to 69 years	9,408	20,955
70 to 74 years	6,733	14,386
75 to 79 years	5,471	11,324
80 to 84 years	4,351	8,937
85 years and over	4,166	8,504
Total	30,129	64,106

Source: American Community Survey and CSI

Figure 10: Senior Population in Arapahoe County, 2011 and 2018



Source: American Community Survey and CSI

There are a number of senior targeted rentals located in Arapahoe County financed through tax credits, public housing dollars, the Section 8 new construction program, and HUD 202 program. CSI found 539 restricted rental units targeted to seniors in Arapahoe County, or 29% of all affordable rentals. There are also two 100+ unit restricted assisted living facilities in Arapahoe County, and many more small assisted living facilities scattered throughout the county, totaling 2,437 beds. While the senior population in Arapahoe County is expected to grow 14% from 2011 to 2018, HUD data shows that seniors as a group are not as cost burdened as other Arapahoe County households, perhaps due to the high percentage of affordable rental units targeted to seniors in the county.

The City of Englewood offers low interest loans for home repairs to qualified and income eligible homeowners, including zero percent deferred loans for households with eligible disabled or elderly persons. When applicable, deferments allow for loan repayment to be postponed until the borrower sells or transfers the property to another owner or the borrower's income increases. South Metro Housing Options also offers homeowner rehabilitation loans to low income owners in Littleton and Centennial.

HOUSING NEEDS FOR MINORITIES

As Arapahoe County continues to grow, the racial and ethnic makeup of its population is changing. The vast majority of the population in the county is white. However, the group's predominance is slowly

shrinking. In 2000, 88.6% of the County’s population was white, while in 2011 the County’s white population had dropped to 83.8%. The next largest group is Hispanic or Latino, comprising 11.5% of the population in Arapahoe County in 2011, compared to 8.5% of the population in 2000. While data is not available on all races, Latino households are more likely to live in poverty than white households.

Table 52: Change in Population by Race and Ethnicity

	Change 2000-2011
White	6.5%
Black or African American	91.4%
American Indian or Alaska Native	-1.9%
Asian	62.7%
Native Hawaiian or Pacific Islander	38.6%
Some other Race	35.0%
Two or More Races	62.1%
Hispanic or Latino	52.8%
Total Population	12.6%

Source: US Census American Community Survey

DISPLACEMENT

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

SECTION FOUR: IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

HUD requires that jurisdictions review previous previously identified impediments to fair housing choice as part of the update of the Analysis of Impediments update. CSI has completed this review and will be recommending changes in the wording and identification of some impediments. The previous language used in labeling impediments highlighted some problems but lacked a more global perspective that concentrated on the lack of affordable housing choices. The following impediments were identified in the 2009 AI.

IMPEDIMENT 1. COMPLAINT EVIDENCE SUGGESTS SOME REAL ESTATE COMPANIES ARE IGNORANT OF AND/OR DO NOT COMPLY WITH FAIR HOUSING LAWS.

The County has little control over the activities of private licenses real estate agents and brokers. Based on surveys compiled for this AI update, Realtors® received the highest level of Fair Housing Training and information in the industry. The County along with other concerned organizations has participated in Regional Fair Housing Training sessions and has responded to complaints by serving as an intermediary to agencies that have the statutory authority to address those complaints.

IMPEDIMENT 2. RESIDENTS WHO ARE VICTIMS OF HOUSING DISCRIMINATION OFTEN DO NOTHING.

The County has not received complaints directly about discrimination in housing. As part of ongoing administration of affordable housing programs, the County requires that grantees comply with HUD requirements. Part of that process involves educating affordable housing residents on how to access resources which can mediate and process discrimination complaints. The County also participated in regional meetings and workshops dealing with Fair Housing requirements. The County has outlined actions to better inform residents who may be victims of discrimination on how they may get redress.

IMPEDIMENT 3. LACK OF EASILY ACCESSIBLE INFORMATION ABOUT FAIR HOUSING.

The County has sponsored and participated in workshops and meetings dealing with Fair Housing regulations and guidelines. The County requires its subgrantees to comply with HUD Fair Housing and Equal Opportunity requirements both in its legal documents and in technical assistance provided at project start up and close out. In early 2013, the County published an informative brochure, outlining in simple terms a definition of Fair Housing, simple statements about what is not allowed, what mortgage lending actions would violate Fair Housing Regulations, and the contact information for agencies which deal with Fair Housing Complaints originating in Arapahoe County. During 2013, the County has distributed 3,500 brochures to individuals and organizations.

IMPEDIMENT 4. NIMBYISM

The County had information sessions and provided public profiles of affordable housing projects and who benefits from them. They have also worked with service and housing providers on ways to identify neighborhood opposition to affordable housing efforts. With the recent downturn in multi-family development in the County there have been few projects that have encountered NIMBY issues.

IMPEDIMENT 5. BARRIERS TO AFFORDABLE HOUSING DEVELOPMENT

Affordable housing development has been stalled in Arapahoe County due to economic challenges. There have been several acquisition and rehab projects in the municipalities which have not encountered difficulties with regulations or excessive fees. Because the projects were viewed as redevelopment projects to substandard properties, the involved governments have been supportive both in providing funding and limiting the regulatory burdens that would be in play on a new construction development project.

PUBLIC SECTOR, ARAPAHOE COUNTY, AND CITIES

As part of the required analysis for public policies and actions that affect Housing Choice, CSI has reviewed the Comprehensive Plans (General Plan), the development and zoning regulations and the building code requirements promulgated by Arapahoe County and the affiliated municipalities. In addition to policies and actions that might affect the availability of a diverse supply of housing, CSI also researched other policies and administrative processes that might affect various community development needs in the community. The Public Housing Authorities have a critical role in promoting Fair Housing and Housing Choice. This section also addresses the policies and administrative plans that the Public Housing Authorities in the County have put in place to further Fair Housing Choice. As part of the assessment of public actions affecting Housing Choice, this section also discusses tax policies which may impact the availability of housing choices for all Arapahoe County residents.

1. GENERAL PLAN

- **The Arapahoe County** Comprehensive Plan has a housing element that also addresses policy and strategies for affordable housing. Policy NH 1.1 Promotes mixed use neighborhoods in areas of growth. The Policy says that Arapahoe County will amend zoning regulations, as applicable to allow a greater mix of residential and compatible non-residential units.
- Policy NH1.2 says that Arapahoe County will promote diverse types of housing, lot sizes, and densities that can assure options for residents of all income levels.
- Policy NH3 supports new affordable housing opportunities and special needs housing in Growth Areas.
- Strategy NH3.1 commits to reducing local government barriers to affordable housing. This strategy includes a number of potential actions including providing tax waivers, fee waivers, fast track permitting, and rezoning specific land to accommodate higher densities, provide flexible design standards which might include reduced parking, narrower street widths, lower sidewalk placement standards, locating multiple utility lines in a single trench.

The Centennial Comprehensive Plan is somewhat vague in describing its support for expanding housing choice.

- The Plan says the City will work to support development of workforce housing; work with private and public agencies to expand financial resources for housing programs, services and financing.
- The Centennial Comprehensive Plan does not use the term “affordable housing” anywhere in the document.

The Littleton Comprehensive Plan has a section on housing and concentrates primarily on affordable housing.

- The Plan calls for the City to continue to participate in various federal funding programs the City now administers.
- The plan takes a cautious approach but does embrace in general terms the following actions:
 1. Continue to support financially, land purchases for low and moderate income housing
 2. Disperse low and moderate income housing throughout the community
 3. Continue to sponsor a housing rehabilitation program to assist homeowners in keeping up with essential maintenance
- The Plan encourages the preservation of Littleton’s existing neighborhoods and supports efforts and programs to preserve the housing that is already built and useable

The Englewood Comprehensive Plan has a detailed list of policies in its housing element.

- Goal 1 states the City will promote a balanced mix of housing opportunities serving the needs of all current and future Englewood citizens.

1. Encourage housing that serves different life stages including housing for singles, couples, small and large families, empty nesters, elderly
2. Encourage housing development that will accommodate groups with special needs as well as independent and assisted living
 - Goal 2 commits the City to improve the quality of the city’s existing housing stock
 - Goal 3 encourages a regional job/housing balance in order to reduce vehicle miles traveled and to bring residents closer to employment centers

The Greenwood Village Plan is silent on any proactive efforts of the City to encourage housing choice for all incomes, and populations which may need affordable housing products. Elements of the plan include:

- Encourage historic preservation efforts where applicable.
- Discourage “infill” projects with higher proposed densities than currently exist in the Design Section

Multi-family residential development is discouraged in all parts of the City except a narrow strip running along I-25. Goals 6, 7, and 8 lay out the Greenwood Village policies on multi-family, attached housing.

- Higher density residential development, such as multi-family homes will be discouraged throughout the City except in one narrowly defined planning subarea located within the I-25 Corridor.
- Additional multi-family rental housing will be discouraged due to the current disproportionate mix of multi-family rental housing compared to multi-family owner housing in the City.
- Only a limited amount of future additional owner occupied multi-family housing will be considered in one designated planning area.

The Sheridan Comprehensive Plan doesn’t articulate any vision for a diversity of housing or affordable housing.

- The Housing Assessment completed by CSI as part of the project to update Arapahoe County Housing Planning documents shows that Sheridan has a high percentage of single family homes priced in the affordable range to some income groups. The comprehensive plan describes the zoning districts the City has designated.
- The RES-MF zoning classification permits attached duplexes and multi-family housing complexes.
- The City has included an item in the Comp Plan for Federal Housing Funds but has not amended the plan to provide any specific information on what that item means.

Conclusion: 1. The County Comprehensive Plan is proactive in promoting support and incentives for expanding housing opportunities. The Comprehensive plans of the municipalities are vaguer about the specifics of policies and strategies they will use in encouraging and facilitating a broader array of housing choices in their communities. Littleton and Englewood have established affordable housing programs within the City Government. The language of all Comprehensive plans allows for multifamily housing development within a described set of conditions. The Greenwood Village Comprehensive Plan appears to not support multifamily housing except in close proximity to I-25. That geographic location is challenging for family oriented multifamily apartments because most parents wouldn’t want their children living in the shadow of I-25 and the light rail tracks.

2. DEVELOPMENT PROCESS AND COSTS:

Conclusion: The Arapahoe county development review process does not appear to be an impediment to fair housing choice. In conducting interviews and research for this Report, CSI did not receive any comments that the development process in any of the municipalities creates exceptional burdens to housing development. However, for the past several years, there has been little new development activity in the County or in the Municipal Jurisdictions. As backlogs begin to form, local processes may

become slower and developers will face greater complexity in getting development plans approved. Littleton is already experiencing a significant increase in applications for multi-Family development. Because the economy has not supported new development, the County and the municipalities have held steady on fees.

3. DEVELOPMENT COSTS AND THE OVERALL COSTS OF HOUSING.

Arapahoe County and the incorporated municipalities all have established fee policies which govern the amount charged for various building types and sizes. Because Arapahoe County evolved from a rural County to a partially urbanized County with multiple city governments, the fee structure varies in each jurisdiction. In some cases there are special districts which supply a variety of services including water, sewer, recreation, flood control and drainage. Generally, these fees have remained stable for the past several years. There have been some increases in water and sewer plant investment fees as water becomes a more valuable and scarce resource. The cost of obtaining new water rights and the necessary infrastructure to support a greater population is passed on to the consumer through increased fees.

If the present growth trend continues, Municipalities with strapped capital improvement budgets will look to increasing the fees to cover the needed expansions to city services. Based on past studies completed by the State Division of Housing, Arapahoe County and the surrounding municipalities have posted higher fee schedules than some other Metro area jurisdictions. The higher fees are partially attributable to the relative young age of infrastructure and service arrangements. As growth moves into undeveloped areas that have not been served by central services, the local governments and special districts have had to invest in new infrastructure to serve more households. These added costs generally are born by the users of the expanded services. In order to encourage the broadest array of housing opportunities throughout the County, the local governments should adopt innovative policies to reduce the impact of government fees on new housing development. The use of fee waivers and deferrals, as well as policies that would allow for payment of some fees over time instead of prior to the start of construction, can provide an incentive to developers to sell and rent their products for a lower price which can increase affordability and provide more housing choices in the market for consumers with limited income.

Conclusion: Development costs are impediments to fair housing choice as they limit options for households with limited income. Local government should take an innovative approach to designing fee structures and policies that enhance affordability and impose less impact on housing costs to the consumer.

4. BUILDING CODES:

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

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

5. DEFINITION OF “FAMILY”:

Most of the Arapahoe County jurisdictions have a zoning code definition of a “family” or related individuals who live together. This definition becomes an item of interest in determining how a jurisdiction administers requests for group homes. Since the group home concept involves sheltering individuals who are not related by birth, marriage or some other legal arrangement, different communities permit group homes with a variety of different regulations. Arapahoe County requires that all proposed group homes meet any state or federal requirements prior to issuing a permit.

Arapahoe County classifies group homes as a use by right in its zoning code.

- The County has specific restrictions on the placing and occupancy levels of homes that are classified as group homes.
- No more than eight individuals may reside in one facility. Each group home has to be spaced at least 750 feet from another.
- All group home applications in the County must have a public hearing.
- The Zoning Administrator has the authority to waive hearing requirements for domestic violence facilities and for those which plan to house disabled persons.

Centennial maintains consistency with siting and occupancy regulations promulgated by other Arapahoe County jurisdictions.

- Centennial creates two classifications for group homes Type A and Type B.
- Type A Group Homes are not subject to public hearing requirements provided they meet all requirements of the Land Development Code.
- The distinguishing characteristic is that a Type B group home may be occupied by more than eight persons if a permit is approved.
- A Type B group home may have no more than 12 occupants including live-in staff.
- A Type B group home application will have a hearing before the Centennial Planning Commission and City Council.

Littleton allows group homes as a use by right in zones that are classed as residential.

- The homes must blend in with existing architecture and building configuration.
- For group homes specifically targeted to the handicapped, no more than four individuals may occupy the facility including any onsite staff.
- Group homes for elderly applications are subject to a hearing before the City Council.
- All group homes must meet state licensing requirements in addition to local regulations.

Englewood designates small and large group home facilities.

- In most zones, the small group home is a permitted use by right.
- Large group homes are permitted as a conditional use in some residential zones and as a use by right in some industrial zones.
- Small group homes have occupancy limits of eight persons.
- The spacing requirements in Englewood regulations are slightly different than other jurisdictions. Group homes have to be spaced at least 750 feet from a facility serving children. Group homes must be spaced 1,250 feet from any other group home.

Greenwood Village treats all group care facilities as a special use.

- The group care designation includes all facilities that provide residential care for the aged, group homes for the developmentally and physically challenged, group facilities for mentally impaired.
- Group care facilities under the Greenwood ordinances do not include facilities which house more than one registered sex offender.

Sheridan permits group homes as a conditional use.

- Occupancy of group homes having less than 9 individuals is permitted
- Larger group homes are permitted but only with a special use permit.
- Posting of the property with its intended use is required but no public hearing is required

Conclusion: the Jurisdictions in Arapahoe County generally accommodate group homes. The specific conditions of approval vary from jurisdiction to jurisdiction. The occupancy limits can impose some challenges to operators because it is not always economically feasible to limit occupancy to eight individuals.

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

Arapahoe County is transitioning from a rural county with isolated self-contained subdivisions to a high growth area with several of the larger municipalities in the Metro area. The rapid urbanization has placed strains on local governments' ability to maintain services and respond with new infrastructure and government services in high growth area. The I-25 and I-220 corridors have generated many employment opportunities. Residents of Arapahoe County have access to substantial employment and service centers that provide jobs, plentiful shopping and access to medical and other professional services.

Englewood and Littleton, which are two of the older, larger communities, have active urban revitalization efforts in place. Both communities focus planning attention and investment on preserving older neighborhoods and linking older commercial areas with new infrastructure improvements. The redevelopment of Cinderella City has been a boon to the City of Englewood. The City is actively promoting the build out of both commercial and residential parcels which remain in the redevelopment area. Englewood is in the process of selecting a developer to construct a Transit Oriented Development near the Hampden and Santa Fe light rail station. Littleton has ongoing neighborhood preservation activities in the older neighborhoods.

The municipal jurisdictions in the County place a heavy emphasis on preserving and protecting the existing neighborhoods from adverse affects of new development and the onset of blight in those older areas.

This report finds that there is a growing shortage of affordable multi-family housing throughout the County. The vigorous increase in commercial activity and the availability of the South Light Rail Line bring more people into the County seeking housing and employment. For residents and potential residents, many of the jobs don't pay an adequate salary to afford much of the market rate housing in the County.

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

8. TRANSPORTATION LINKAGE:

Some jurisdictions in Arapahoe County have faced the challenges and opportunities of light rail mass transit earlier than other areas of the Metro Area. Part of the developing upturn in economic activity is because those communities have responded well to the enhanced transportation access that an improved I-25 and Light Rail line have presented. All of the jurisdictions have language in their comprehensive plans which focus on linking public transportation modes with both commercial and residential development. Most of the incorporated communities are served by moderately adequate bus service. The unincorporated areas of the County have spotty transit linkages. Englewood has lead a successful redevelopment of the formerly Cinderella City Shopping Mall into a multi-modal transit

center that includes the Englewood City Hall, retail shopping and housing. The City is in the planning stage for an affordable multifamily development near the light rail station on Santa Fe and Hampden.

The municipalities receive Community Development Block Grant funds from the County through an allocation process. On an annual basis, a substantial portion of those funds are used for improving transportation connections in low income neighborhoods. Those activities include improving sidewalks and trails so that walkers and bicyclists can gain easy access to central business districts and transit nodes. Throughout Arapahoe County, there is greater interest and activity around improving the Walkability of neighborhoods.

Conclusion: Arapahoe County is making strides in providing better transit options for its residents. The County has been a partner with the municipalities to provide more housing linked with transit in the County. The County has partnered with municipalities to provide road, sidewalk and trail improvements.

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

The County has four Public Housing Authorities. The Englewood and Littleton Housing Authorities are stand alone agencies. The Littleton Housing Authority contracts with the Arapahoe County Housing Authority to administer the Section 8 Vouchers it receives from the Colorado Division of Housing. The Englewood Housing Authority contracts with the Sheridan Housing Authority to administer Section 8 Vouchers it receives both from HUD and the Colorado Division of Housing. Presently all the Public Housing Authorities have closed waiting lists. The Federal Budget Sequester legislation has forced the Housing Authorities to stop issuing new vouchers when they have an opening. In order to preserve their payment standards, the Housing Authorities are not issuing new vouchers in the hope that they will be able to stay within their contracted budget authority.

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

10. SALE OF SUBSIDIZED HOUSING/DISPLACEMENT:

Neither Housing Authority has any plans for the sale nor disposition of Public Housing units or other deed restricted affordable units. Arapahoe County and Sheridan Housing Authorities do not own physical units and do not directly administer any programs. The administration is handled by contracts with Englewood and Littleton.

Conclusion: The Four Housing Authorities operating in Arapahoe County (excluding the Entitlement City of Aurora) are performing in a successful manner. All the Housing Authorities are under great pressure as a result of the Budget Sequester Legislation. As a result of the freeze on issuing new Vouchers, the Housing Choice Voucher program has come to a standstill in these communities. There is little turnover among Section 8 participants. As a result no one is issued a new voucher. Rents have risen and vacancy rates have declined to a point that there are few units available in the market. Section 8 participants who choose or need to move to a new dwelling are finding it difficult to find a unit that is affordable (even with the Subsidy) and they are finding it difficult to find landlords who will accept the voucher payment.

11. PROPERTY TAX POLICIES:

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

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

12. ADMINISTRATIVE POLICIES CONCERNING COMMUNITY DEVELOPMENT AND HOUSING ACTIVITIES, SUCH AS URBAN HOMESTEADING, MULTI-FAMILY REHABILITATION, AND ACTIVITIES CAUSING DISPLACEMENT, WHICH AFFECT OPPORTUNITIES OF MINORITY HOUSEHOLDS TO SELECT HOUSING INSIDE OR OUTSIDE OF AREAS OF MINORITY CONCENTRATION:

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

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

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

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

13. WHERE THERE IS A DETERMINATION OF UNLAWFUL SEGREGATION OR OTHER HOUSING DISCRIMINATION BY A COURT, OR A FINDING OF NONCOMPLIANCE BY HUD REGARDING ASSISTED HOUSING WITHIN A RECIPIENT’S JURISDICTION, AN ANALYSIS OF THE ACTIONS WHICH COULD BE TAKEN BY THE RECIPIENT TO HELP REMEDY THE DISCRIMINATORY CONDITION, INCLUDING ACTIONS INVOLVING THE EXPENDITURE OF FUNDS MADE AVAILABLE: N/A

Conclusion: N/A

PRIVATE SECTOR

FOR-SALE HOUSING

Home Mortgage Disclosure Act (HMDA) Data

Home Mortgage Disclosure Act (HMDA) data is available for loans made on properties in Arapahoe County. This information provides an overview of mortgage lending practices within Arapahoe County in 2011. Specific areas to evaluate (which may suggest potential discriminatory practices or trends) include high denial rates for minority and female applicants; very low denial rates; unusually low levels of applications from women, minorities and low and moderate-income persons; and a high number of applications withdrawn by minority applicants, as compared to non-minority applicants.

Data from HMDA was obtained for a total of 37,392 loan applications made in 2011 in Arapahoe County. Of these, 66.5% were for conventional loans, 25.1% for FHA loans, and 8.4% for VA loans. Only 34.8% of loan applications were to purchase a home, while 63% were for to refinance a home and 2.2% were to make home improvements. The large number of refinance loans is a reflection of the very low interest rates in 2011, and the low number of homes being sold at that time in Arapahoe County.

Loan origination rates ranged from a low of 55.5% for African Americans, to a high of 67.1% for white households. Loan origination rates have increased for African American households since the last AI in 2009, and decreased for Asian and White households. Loan denial rates ranged from a low of 14.9% for Whites, to a high of 34.4% for African Americans. Hispanic households also had a lower loan origination rate than non-Hispanic households, and a higher loan denial rate. Hispanic households have also seen a decline in loan origination rates and increase in denial rates since 2009. Women had origination and denial rates similar to all households in Arapahoe County.

Table 53: Action Taken on Loan by Race, Ethnicity, and Sex Arapahoe County, 2011

Race/Ethnicity	Loan Originated	Loan Not Accepted by Applicant	Loan Denied	Application Withdrawn	File Closed	Total
Race:						
African American	55.5%	7.0%	24.4%	9.9%	3.3%	1,347
Asian/Pacific Islander	62.2%	5.8%	20.1%	7.6%	4.3%	1,457
White	67.1%	5.4%	14.9%	9.6%	3.0%	20,967
Ethnicity:						
Hispanic/Latino	56.5%	6.7%	21.6%	11.6%	3.6%	1,838
Non-Hispanic	66.5%	5.3%	15.4%	9.6%	3.2%	22,231
Women	63.2%	5.4%	17.9%	10.1%	3.4%	7,955
Total	63.5%	5.5%	17.2%	10.0%	3.8%	27,843

Source: 2011 HMDA Raw Data and CSI

Reasons for the denial of applications are listed on Table 54 by race, ethnicity, and gender . The biggest categories for denial were “debt to income ratio”, “credit history” and “collateral”. There were a total of 4,794 loan denials during 2011. No one racial or ethnic group had higher denial rates in a majority of categories than other groups.

Table 54: Loan Denial Reason by Race, Ethnicity, and Gender Arapahoe County, 2011

	All	White	Black	Asian	Hispanic	Women
Debt-to-Income Ratio	20.6%	20.0%	19.7%	28.0%	21.3%	22.3%
Employment History	1.5%	1.6%	2.4%	0.4%	3.9%	1.2%
Credit History	20.2%	17.7%	29.0%	17.7%	25.5%	21.1%
Collateral	21.7%	22.6%	18.3%	17.7%	16.8%	19.1%
Insufficient Cash	1.8%	2.1%	1.4%	1.8%	1.5%	1.6%
Unverifiable Information	9.1%	9.0%	8.6%	11.4%	9.3%	10.0%
Credit Application Incomplete	10.9%	12.2%	8.6%	9.2%	8.1%	11.1%
Mortgage Insurance Denied	0.1%	0.2%	0.3%	0.4%	0.0%	0.2%
Other	14.2%	14.6%	11.7%	13.3%	13.5%	13.6%

Source: 2011 HMDA Raw Data and CSI

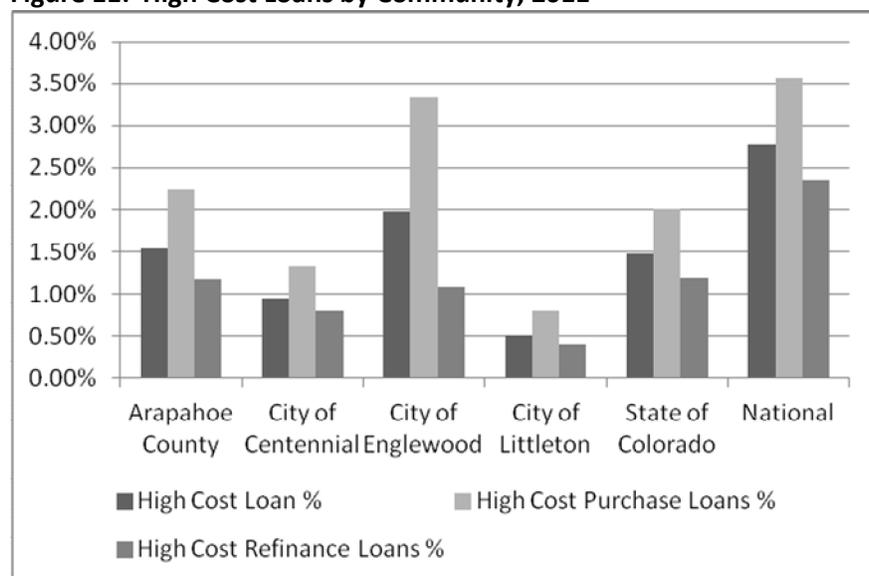
Table 55, below, shows the number of high cost loans in Arapahoe County and the larger cities within the county. The recent national foreclosure crisis illuminated the risks to borrowers who used high cost loans and ended up losing their homes. Risky loan products were targeted to low income households and minorities across the nation. Arapahoe County borrowers across the county had only a slightly higher instance of high cost purchase loans, and similar rate of high cost refinance loans, as throughout Colorado, where there are less high cost loans as a percent of all loans than throughout the US. Centennial, however, had a notably higher rate of high cost purchase loans than in other areas of Arapahoe County.

Table 55: High Cost Loans by Community, 2011

	# of Loans	High Cost Loan %	Purchase Loans	High Cost Purchase Loans %	Refinance Loans	High Cost Refinance Loans %
Arapahoe County	17,262	1.54%	6,058	2.23%	11,204	1.17%
City of Centennial	3,496	9.40%	976	1.33%	2,520	0.79%
City of Englewood	758	1.98%	299	3.34%	459	1.09%
City of Littleton	1,367	0.51%	382	0.79%	985	0.41%
State of Colorado	150,371	1.47%	50,700	2.00%	99,671	1.19%
National	5,917,574	2.77%	2,037,856	3.57%	3,879,718	2.35%

Source: PolicyMap, HMDA Data

Figure 11: High Cost Loans by Community, 2011



Source: PolicyMap, HMDA Data

The following table does show that African Americans and Hispanics are more likely to borrow using high cost loans to purchase and refinance existing loans. The small number of high cost loans in Centennial, Englewood, and Littleton make an accurate analysis of this data impossible.

Table 56: High Cost Loans by Race and Ethnicity, 2011

	Arapahoe County	City of Centennial	City of Englewood	City of Littleton	State of Colorado	National
High Cost Loans	266	33	15	7	2,205	163,776
Loans to Whites	195	28	14	6	1,886	135,754
Percent of all Loans to Whites	1.42%	0.95%	2.13%	0.50%	1.47%	2.87%
Percent of High Cost Loans	73.31%	84.85%	93.33%	85.71%	85.53%	82.89%
Loans to African Americans	23	1	1	0	66	14168
Percent of all Loans to Af.Amer.	3.14%	1.52%	20.00%	NA	2.55%	5.80%
Percent of High Cost Loans	8.65%	3.03%	6.67%	NA	2.99%	8.65%
Loans to Asians	17	2	0	0	47	3177
Percent of all Loans to Asians	2.02%	1.89%	NA	NA	1.23%	0.97%
Percent of High Cost Loans	6.39%	6.06%	NA	NA	2.13%	1.94%
Loans to Hispanics	23	0	1	2	290	19129
Percent of all Loans to Hispanics	2.27%	NA	2.27%	4.45%	2.99%	5.10%
Percent of High Cost Loans	8.65%	NA	6.67%	28.57%	13.15%	11.68%

Source: PolicyMap, HMDA Data

Although HMDA data is not conclusive, it does show that loan applications are proportional to the population makeup of Arapahoe County, with slight under representation from the minority community. However, loan denials due to bad credit and debt to income ratios for minorities are an issue that could be solved with increased homebuyer counseling efforts targeted to minority populations and downpayment assistance program loans for these households.

Conclusion: Area lending policies do not appear to be an impediment to fair housing, but predatory lending practices should be watched carefully, as these lenders prey upon minorities and low income households.

PUBLIC AND PRIVATE SECTOR

FAIR HOUSING ENFORCEMENT

Fair housing enforcement is handled by the U. S. Department of Housing and Urban Development Office of Fair Housing in Denver, as well as the Colorado Civil Rights Division. The Housing Authorities, other local housing organizations and advocates refer housing discrimination complaints to the Colorado Civil Rights Division or to HUD.

INFORMATION PROGRAMS

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

ARAPAHOE COUNTY REALTOR/LENDER/PROVIDER FAIR HOUSING SURVEY

The Community Strategies Institute created and distributed an online survey to collect primary data about the realty and lending practices in the county, particularly as they relate to Fair Housing. This electronic survey was distributed to realtors and bankers via the South Metro Denver Realtors Association, at various brokerage offices, the Colorado Mortgage Lenders Association and through the Colorado Housing Assistance Corporation, which provides downpayment assistance loans throughout metro Denver. A total of 40 professionals responded to the survey, including 18 realtors, 12 bankers/lenders, six service providers, a lawyer, and staff of other nonprofit agencies. Although extensive efforts were made to reach out to bankers/lenders and encourage them to participate in the survey, response rates were still very low. Local agencies attributed the lack of responses to very heavy workloads resulting from a high volume of sales and refinancing applications and a general apprehension to respond to surveys.

The results of the 13-question survey are summarized below. In any given answer, fewer than 40 responses may be recorded. Survey results are based upon only complete responses to a particular question.

FAIR HOUSING CHOICE

The survey was open to any professional working in residential real estate or lending in Arapahoe County. After asking respondents to define their professional affiliation, the survey opened with questions to seek opinions regarding a number of possible impediments to fair housing choice.

Table 57: Affordable Housing Supply

Do you believe a lack of affordable housing units for low- to very low-income households is an impediment to fair housing choice within Arapahoe County?		
Answer Options	Response %	Response Count
Yes	48.0%	12
No	52.0%	13
answered question		25
skipped question		15

Source: Community Strategies Institute

Table 58: Emergency, Transitional and Permanent Housing for Homeless

Do you believe a lack of an adequate supply of emergency, transitional and permanent housing for homeless is an impediment to fair housing choice within Arapahoe County?		
Answer Options	Response %	Response Count
Yes	42.3%	11
No	57.7%	15
answered question		26
skipped question		14

Source: Community Strategies Institute

Forty-eight percent (48%) of survey respondents believe that there is a lack of affordable units for low and very-low income households in the county and that this impacts fair housing choice. Less than 50% of respondents (42.3%) believe the supply of emergency, transitional and permanent housing for the homeless is an impediment to fair housing choice. This likely reflects a lack of understanding regarding these units among the respondent target, particularly if the respondents have had very few interactions with this type of housing.

FAIR HOUSING TRAINING

Training is provided to the professionals responding to the survey and was utilized in the past year by all but one lender responding and 75% of realtors. The majority of realtors and lenders believe their colleagues understand and implement fair housing laws and practices. Only 9% of those in the banking industry said their institution participated in community activities under the Community Reinvestment Act (CRA). Lender may be with private mortgage companies or unaware of CRA activities.

Table 59: Fair Housing/Lending Training

Does your place of work provide training opportunities for staff regarding fair housing and fair lending practices?		
Answer Options	Response Percent	Response Count
Yes	90.3%	28
No	9.7%	3
In the past year, have you attended a training on fair housing law either offered through your employer or another agency?		
Yes	80.6%	25
No	19.4%	6
Do you think lenders and realtors working within Arapahoe County understand and implement fair housing laws and practices?		
Yes	90.0%	27
No	10.0%	3

Source: Community Strategies Institute

Table 60: CRA Activities

If you work in the banking industry, does your lending institution participate in community activities under the Community Reinvestment Act (CRA)?		
Answer Options	Response Percent	Response Count
Yes	9.1%	1
No	90.9%	10
<i>answered question</i>		11
<i>skipped question</i>		29

Source: Community Strategies Institute

COMMUNITY PERCEPTIONS

Table 61: The impact of NIMBYism

Do you believe there is a prevalence of NIMBYism (Not in My Backyard) or reluctance to build low- or moderate-income housing or special needs projects within Arapahoe County?		
Answer Options	Response Percent	Response Count
Yes	44.0%	11
No	56.0%	14
<i>answered question</i>		25
<i>skipped question</i>		15

Source: Community Strategies Institute

Respondents recognized the existence of NIMBYism among their fellow residents, with 44% agreeing that NIMBY attitudes may be negatively impacting the development of low- to moderate-income units or special needs projects. However, the majority do not feel that NIMBY causes a reluctance to build low income or special needs housing in Arapahoe County.

Respondents do not see the lack of consistent public transportation and the city & county zoning and development policies as other possible deterrents to even dispersion of low and moderate-income households and consistent access to public transportation.

Table 62: Public Transportation

Do you believe that public transportation services provide consistent service levels throughout all of Arapahoe County?		
Answer Options	Response Percent	Response Count
Yes	61.9%	13
No	38.1%	8
<i>answered question</i>		21
<i>skipped question</i>		19

Source: Community Strategies Institute

Table 63: Zoning and Development Policies

Do you believe current zoning and development policies within Arapahoe County encourage an even distribution of low- and moderate-income households throughout the area?		
Answer Options	Response Percent	Response Count
Yes	56.3%	9
No	43.8%	7
If no, please explain		9
answered question		16
skipped question		24

Source: Community Strategies Institute

LENDING PROGRAMS

Table 64: FHA/VA/UHC Loan Program Participation

If you are a lender, do you participate in Veteran's Administration (VA), Federal Housing Administration (FHA) or Colorado Housing and Finance Authority (CHFA) loan programs?		
Answer Options	Response Percent	Response Count
Yes	91.7%	11
No	8.3%	1
answered question		12
skipped question		28

Source: Community Strategies Institute

Table 65: Downpayment Assistance

If you are a lender, do you suggest that your low- and moderate-income borrowers access down payment assistance programs such as those offered by Arapahoe County through Funding Partners or Colorado Housing and Finance Authority (CHFA)?		
Answer Options	Response Percent	Response Count
Yes	92.9%	13
No	7.1%	1
answered question		14
skipped question		26

Source: Community Strategies Institute

Table 66: Homebuyer Education Program Participation

If you are a lender, do you suggest that your first-time homebuyers attend a buyer education program?		
Answer Options	Response Percent	Response Count
Yes	85.7%	12
No	14.3%	2
answered question		14
skipped question		26

Source: Community Strategies Institute

Only lenders were asked to respond to questions regarding loan programs, down payment assistance programs and homebuyer education programs. However, the number of responses indicate that a few Realtors® responded as well. Nonetheless, when the lender responses were reviewed, all indicated that they participated in loan programs offered by the Colorado Housing Finance Authority, Federal Housing Administration and the Veteran’s Administration. Likewise, these lenders all utilize downpayment assistance programs and homebuyer education programs.

SURVEY CONCLUSIONS

Responses allowed for significant insight into community perceptions and the practices of residential realtors and lenders as they relate to Fair Housing.

In particular, many real estate professionals working in Arapahoe County acknowledged the lack of affordable housing units in Arapahoe County, though the majority felt that there is adequate supply. They did not feel that a prevalence of NIMBYism in the community created issues for low and very low-income households by either limiting their choices in housing or preventing the development of new units. These professionals also do not believe that the lack of transportation choices and zoning/development policies of the local government further diminish housing choices. Service providers, however, overwhelmingly do feel that NIMBYism, zoning/development policies of the local government and housing costs are barriers to low income households.

Fair housing training and loan programs designed to help lower income and first-time homebuyers do appear to be widely utilized. A full listing of survey results is attached as Appendix A.

ASSESSMENT OF CURRENT PUBLIC AND PRIVATE FAIR HOUSING PROGRAMS AND ACTIVITIES IN THE JURISDICTION

ACTIONS AND PROGRAMS

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

The Arapahoe County Comprehensive Plan outlines a number of policies and strategies to encourage more affordable housing. The County has modified its policies and added new strategies to encourage the production of more affordable housing. The County strategies call for a diversity of housing types in mixed use developments. Along major corridors in the unincorporated areas of the County, the County will promote and permit multi-story buildings that contain ground floor retail and services with apartments and/or offices located above.

The height limit of those new structures is flexible as long as those structures don't change the character of existing neighborhoods. The County is also willing to consider any of the following actions to stimulate the production of more affordable housing: rebates of sales and use taxes for construction materials in affordable units; waiver or deferral of development fees for affordable housing; fast track permitting or waive of certain processes for affordable units; rezone of specific parcels for higher densities for affordable projects.

Policy NH3.2: provides for support for special needs housing in growth areas. The County will support the provision of group homes, shelters for homeless persons and victims of domestic violence, elderly housing, housing for people with physical and mental challenges. The County has adopted these policies and strategies to expand the supply of affordable housing for multiple populations.

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

SECTION SIX: PUBLIC PROCESS

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

Over 30 different housing organizations, governmental agencies and advocacy groups involved in housing issues, housing providers, lenders and financial institutions, educational institutions and other organizations involved or interested in housing issues were contacted, or provided information and are listed in Appendix D to this report. Internet based surveys were used with housing industry lenders and realtors.

CSI held a public forum to review preliminary findings from the Housing Needs Assessment and Analysis of Impediments with the public. Comments and feedback from this hearing were used in the creation of this plan, and are included as Appendix B. This forum was conducted in accordance with the Arapahoe County Public Participation Plan and notice of the public forum was posted in the Villager newspaper.

CSI also held two focus groups. The first focus group discussed affordable housing needs in Arapahoe County, and possible solutions to meet current needs. The second focus group discussed barriers to affordable housing and Fair Housing issues. Participants in the focus groups included public and private housing providers, housing authorities, agencies serving special needs populations, realtors, and lenders.

The plan was presented to the Arapahoe County Commissioners on October 1, 2013. A legal notice that the plan was available for public comment was published in The Villager on September 26, 2013 and the public was given 30 days to provide comments on the plan. No comments were received. The plan was adopted by the Arapahoe County Commissioners at a hearing on November 19th, 2013.

SECTION SEVEN: CONCLUSIONS AND RECOMMENDATIONS

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

I. The County Community Resources Department should continue to work with the planning and zoning departments at the county and municipal level to expand efforts to broaden housing choices. As growth pressures place new demands in the housing market, local governments will have to redouble their efforts to address the challenges of regulation and fees on housing cost.

II. The County should increase its efforts to partner with local agencies and developers in formulating plans for new low income rental projects in order to have some impact on the growing numbers of households which are cost burdened by their housing costs. In order to obtain outside funding for new affordable housing opportunities, the County and municipalities will have to provide the needed start up funds in order to leverage greater investment from State and Federal agencies which have funding for affordable housing efforts.

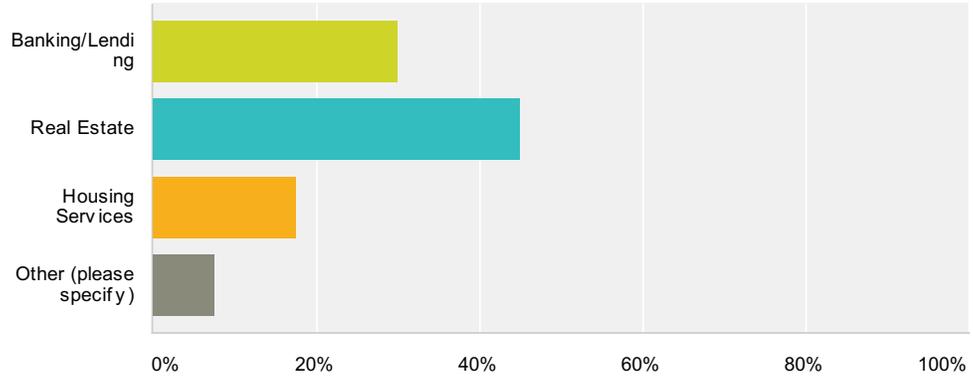
III. The County should continue to sponsor and promote Housing Choice activities and events in order to educate consumers, industry personnel and the public on the benefits of securing adequate housing choices for low income and minority households.

IV. The County should continue to support efforts to preserve current stock of both single family and multi-family that is affordable to those with limited income.

APPENDIX A: ARAPAHOE COUNTY ANALYSIS OF IMPEDIMENTS SURVEY RESULTS

Q1 What is your professional affiliation?

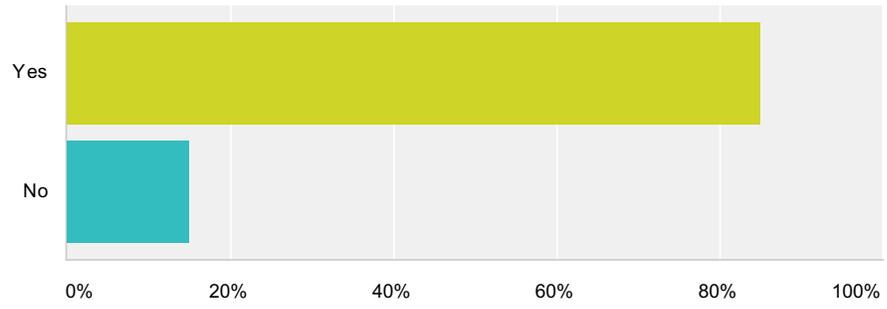
Answered: 40 Skipped: 1



Answer Choices	Responses
Banking/Lending	30% 12
Real Estate	45% 18
Housing Services	17.50% 7
Other (please specify)	7.50% 3
Total	40

Q2 Do you buy/sell real estate, lend or provide housing services in Arapahoe County?

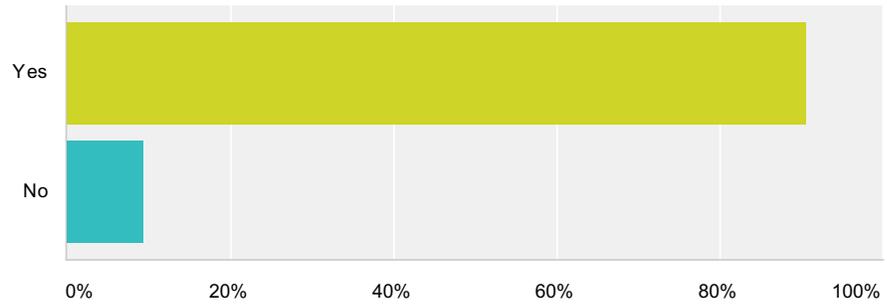
Answered: 40 Skipped: 1



Answer Choices	Responses
Yes	85% 34
No	15% 6
Total	40

Q3 Does your place of work provide training opportunities for staff regarding fair housing and fair lending practices?

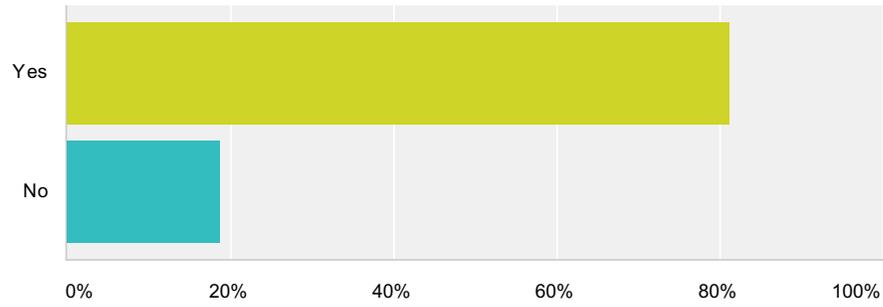
Answered: 32 Skipped: 9



Answer Choices	Responses	
Yes	90.63%	29
No	9.38%	3
Total		32

Q4 In the past year, have you attended a training on fair housing law either offered through your employer or another agency?

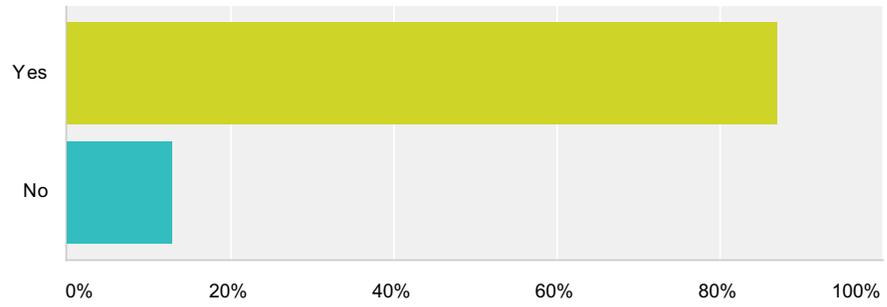
Answered: 32 Skipped: 9



Answer Choices	Responses	
Yes	81.25%	26
No	18.75%	6
Total		32

Q5 Do you think lenders and realtors working within Arapahoe County understand and implement fair housing laws and practices?

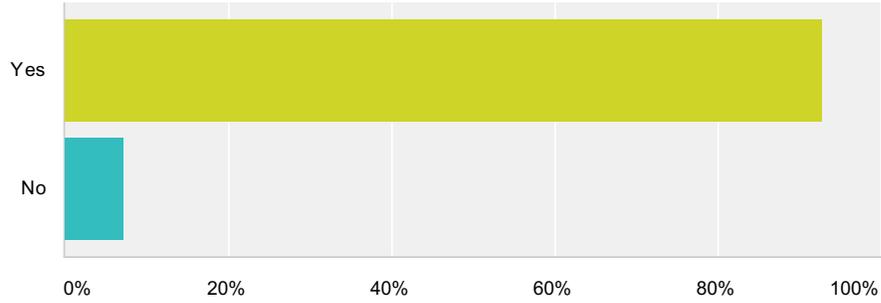
Answered: 31 Skipped: 10



Answer Choices	Responses	
Yes	87.10%	27
No	12.90%	4
Total		31

Q6 If you are a lender, do you suggest that your low- and moderate-income borrowers access down payment assistance programs such as those offered by Arapahoe County through Colorado Housing Assistance Corporation (CHAC) or Colorado Housing and Finance Authority (CHFA)?

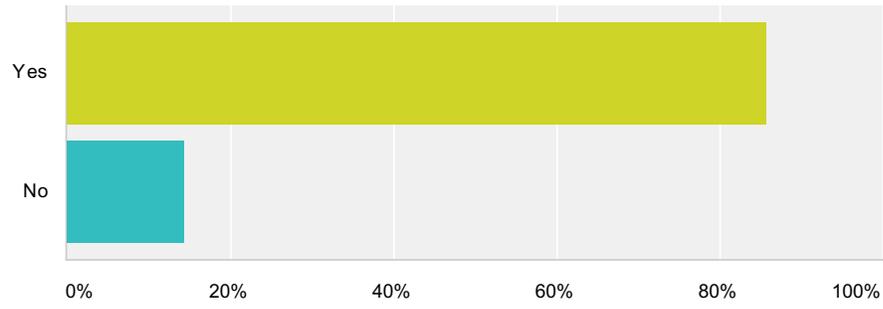
Answered: 14 Skipped: 27



Answer Choices	Responses	
Yes	92.86%	13
No	7.14%	1
Total		14

Q7 If you are a lender, do you suggest that your first-time homebuyers attend a buyer education program?

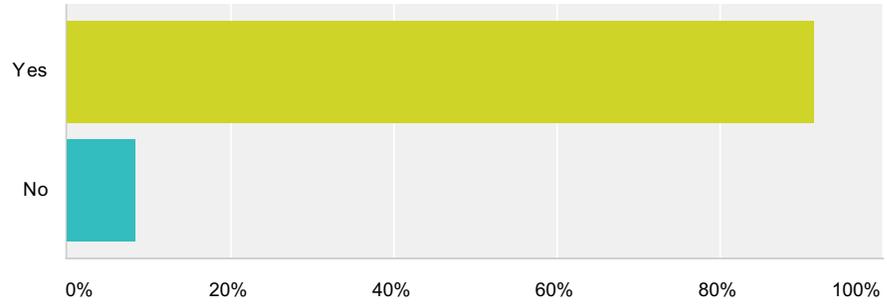
Answered: 14 Skipped: 27



Answer Choices	Responses
Yes	85.71% 12
No	14.29% 2
Total	14

Q8 If you are a lender, do you participate in Veteran's Administration (VA), Federal Housing Administration (FHA) or Colorado Housing and Finance Authority (CHFA) loan programs?

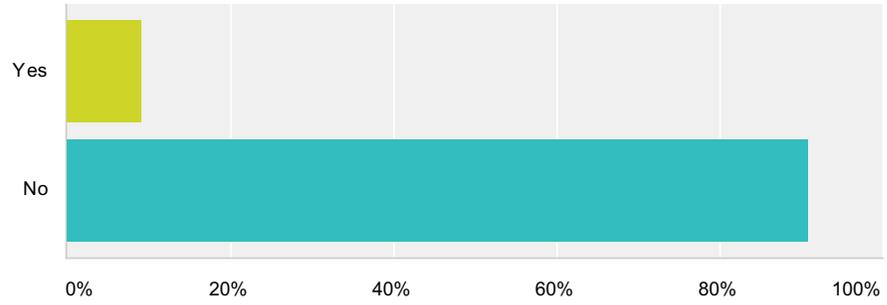
Answered: 12 Skipped: 29



Answer Choices	Responses
Yes	91.67% 11
No	8.33% 1
Total	12

Q9 If you work in the banking industry, does your lending institution participate in community activities under the Community Reinvestment Act (CRA)?

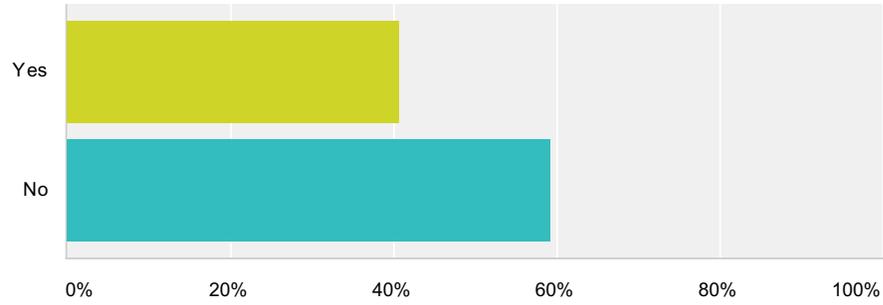
Answered: 11 Skipped: 30



Answer Choices	Responses	
Yes	9.09%	1
No	90.91%	10
Total		11

Q10 Do you believe a lack of an adequate supply of emergency, transitional and permanent housing for homeless is an impediment to fair housing choice within Arapahoe County?

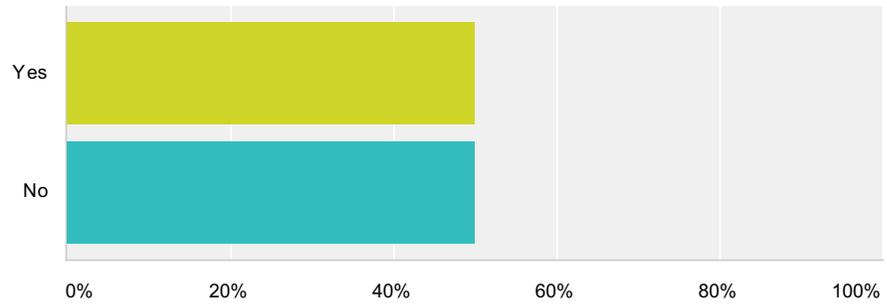
Answered: 27 Skipped: 14



Answer Choices	Responses
Yes	40.74% 11
No	59.26% 16
Total	27

Q11 Do you believe a lack of affordable housing units for low- to very low-income households is an impediment to fair housing choice within Arapahoe County?

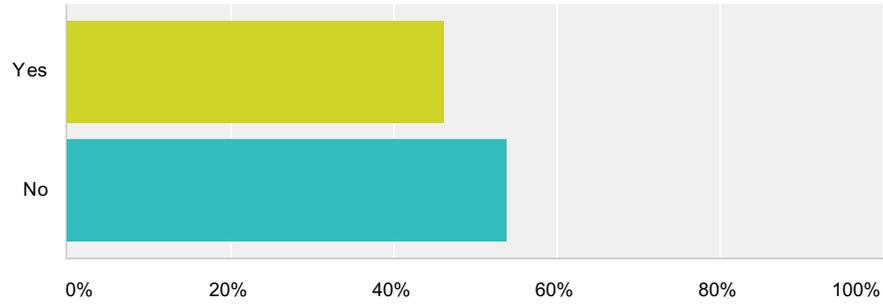
Answered: 26 Skipped: 15



Answer Choices	Responses	
Yes	50%	13
No	50%	13
Total		26

Q12 Do you believe there is a prevalence of NIMBYism (Not in My Backyard) or reluctance to build low- or moderate-income housing or special needs projects within Arapahoe County?

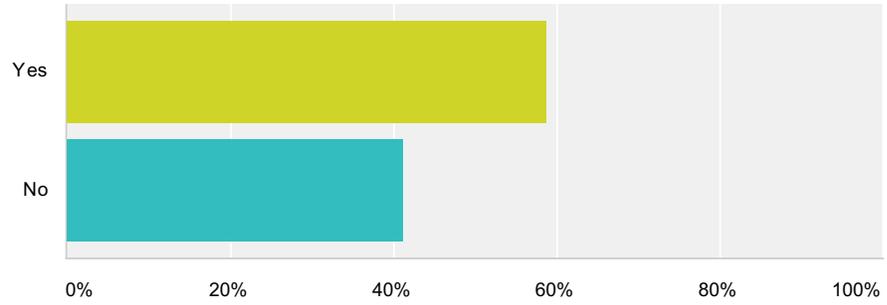
Answered: 26 Skipped: 15



Answer Choices	Responses
Yes	46.15% 12
No	53.85% 14
Total	26

Q13 Do you believe current zoning and development policies within Arapahoe County encourage an even distribution of low- and moderate-income households throughout the area?

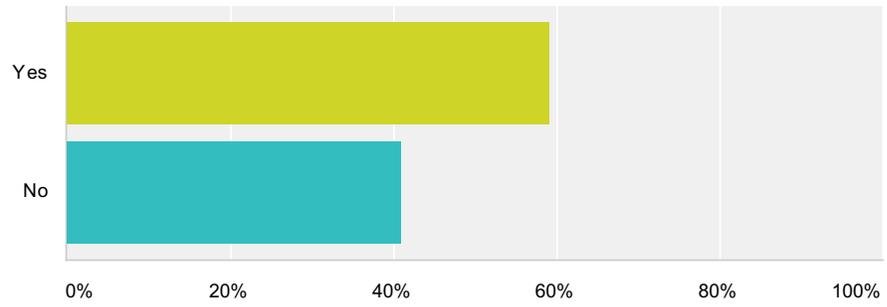
Answered: 17 Skipped: 24



Answer Choices	Responses	
Yes	58.82%	10
No	41.18%	7
Total		17

Q14 Do you believe that public transportation services provide consistent service levels throughout all of Arapahoe County?

Answered: 22 Skipped: 19



Answer Choices	Responses	
Yes	59.09%	13
No	40.91%	9
Total		22

Q15 In your opinion, what is the most pressing fair housing issue now evident in Arapahoe County?

Answered: 18 Skipped: 23

APPENDIX B: PUBLIC HEARING MINUTES

Arapahoe County Analysis of Impediments to Fair Housing Choice Public Hearing May 21st 2013 Minutes

Arapahoe County held a public hearing to provide information about Fair Housing and affordable housing needs in Arapahoe County on May 21, 2013. The meeting was also held to solicit input into Fair Housing Needs. The meeting was advertised according to HUD guidelines and the Arapahoe County Citizen Participation Plan in The Villager newspaper and through contacting interested agencies. The daytime meeting was held at 1:30 pm at the City of Centennial. An evening meeting was also scheduled and convened at 6:00 pm. No one attended the second meeting.

In attendance at the 1:30 pm meeting was:

Linda Haley, Senior Resource Manager, Arapahoe County Housing and Community Development
Liana Escott, Arapahoe County Housing and Community Development
Tom Hart, Director, Community Strategies Institute
Jennie Rodgers, Director, Community Strategies Institute
Melissa Moran, Comitris Family Services
Deborah Grigsby, Colorado Community Media
Ashley Cloutier, Denver Fair Housing Center

The meeting was opened at 1:30 pm. Tom Hart of CSI made a presentation about Fair Housing data and housing needs in Arapahoe County. Attendees were asked to discuss Fair Housing needs, and the needs of their clients in Arapahoe County.

Comitris: the only homeless shelter in Aurora. Families can stay 6 months, and still have trouble finding housing

- There is a lack of shelter in in Arapahoe county
- Camping ban in Denver pushed more homeless to Aurora
- Family shelter has a long waiting list
- Shelter to housing – lack of low income units is an issue
- If families have evictions it makes it even harder for them to find a unit – this is an extra barrier to finding a unit – even if the eviction is more than 12 months prior, landlords require higher security deposits. Even PHAs do not like evictions
- Households are trying to find units in Aurora, mostly, some move out of Aurora, but only if accepted to housing programs in other areas
- People are living in motels – it is harder and harder to place families in hotels
- More large families coming for shelter who are hard to house
- Employment and daycare are issues that make it hard to find housing
- Many housing programs require employment to get into the housing

Denver Metro Fair Housing Center:

- Trying to raise awareness in the Denver metro area
- Will be educating providers, providing TA
- NFHA – helping the center with materials in various languages – they have national materials. Local materials are being developed
- The agency has money to put towards accessibility modifications

No other comments were made, and the hearing was closed at 2:30 pm.

APPENDIX C: MAPS

Map #1 – Areas of Minority Concentration, Arapahoe County

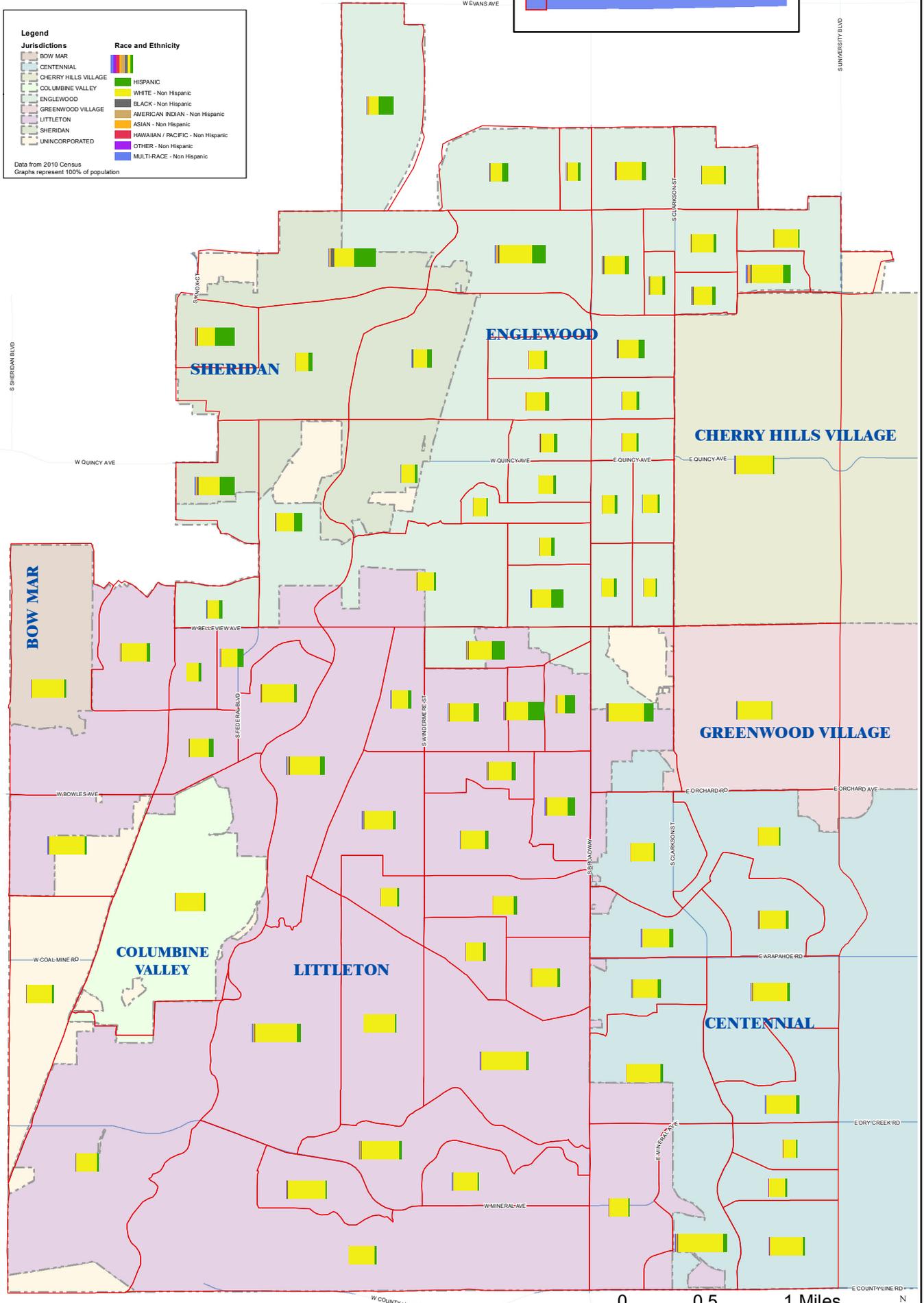
Race and Ethnicity Southwest Arapahoe County



Legend

Jurisdictions	Race and Ethnicity
BOW MAR	HISPANIC
CHERRY HILLS VILLAGE	WHITE - Non Hispanic
COLUMBINE VALLEY	BLACK - Non Hispanic
ENGLEWOOD	AMERICAN INDIAN - Non Hispanic
GREENWOOD VILLAGE	ASIAN - Non Hispanic
LITTLETON	HAWAIIAN / PACIFIC - Non Hispanic
SHERIDAN	OTHER - Non Hispanic
UNINCORPORATED	MULTI-RACE - Non Hispanic

Data from 2010 Census
Graphs represent 100% of population

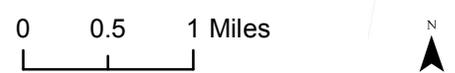
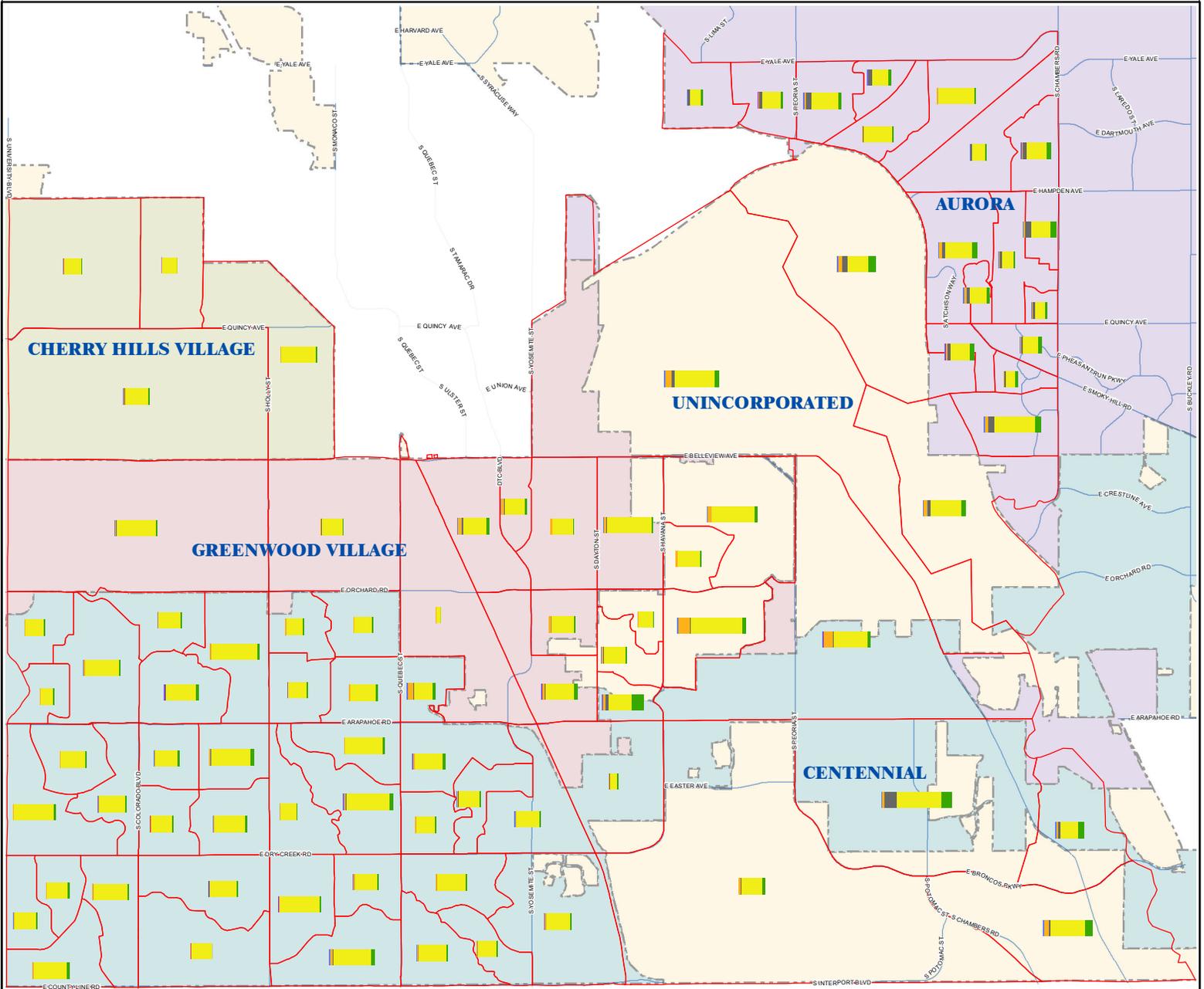
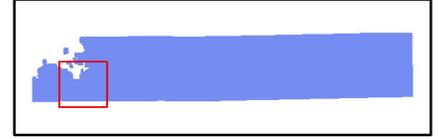


Race and Ethnicity South Central Urban Arapahoe County

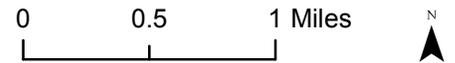
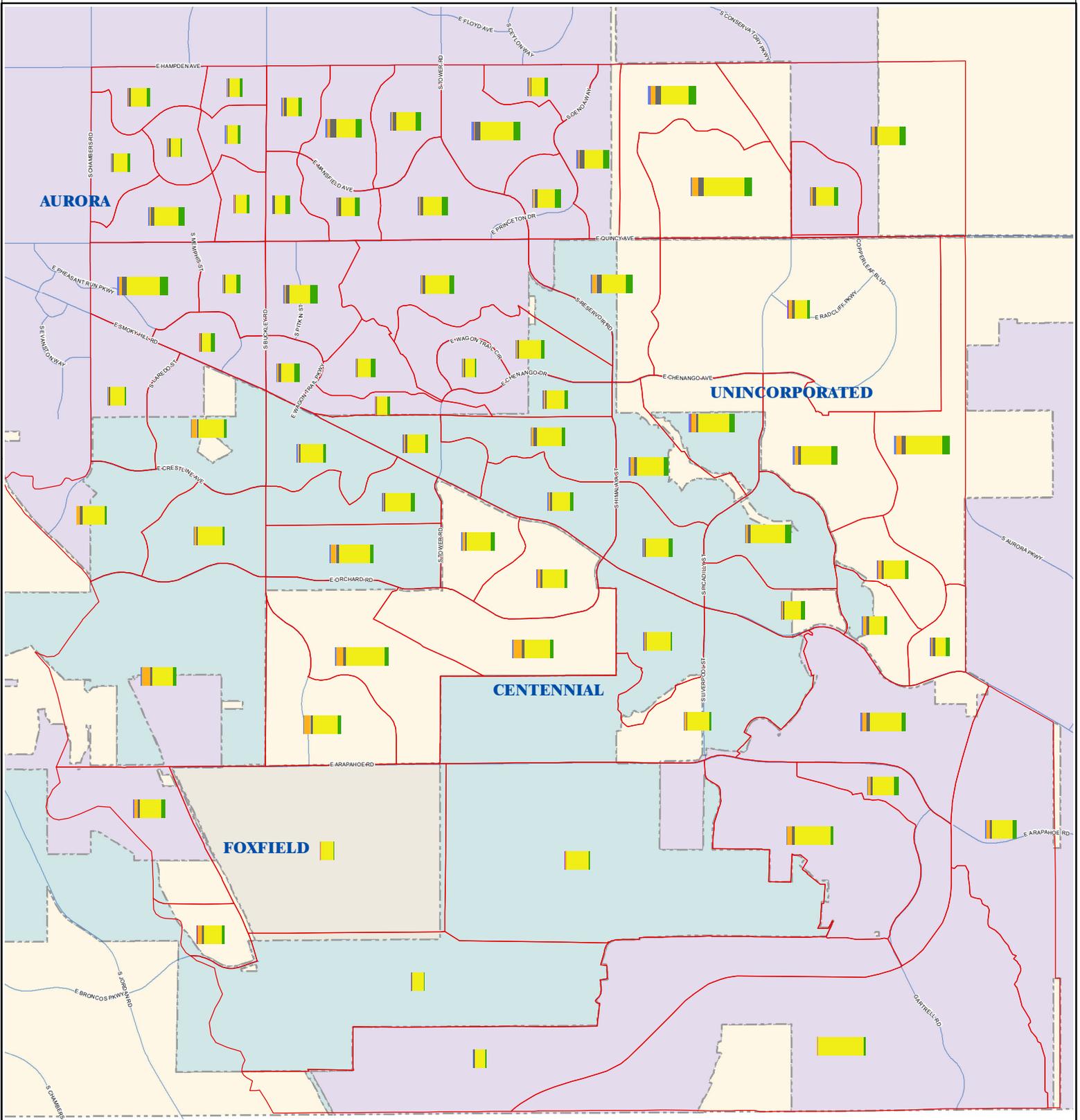
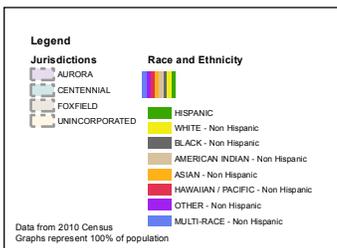
Legend

Jurisdictions	Race and Ethnicity
AURORA	HISPANIC
CENTENNIAL	WHITE - Non Hispanic
CHERRY HILLS VILLAGE	BLACK - Non Hispanic
GREENWOOD VILLAGE	AMERICAN INDIAN - Non Hispanic
UNINCORPORATED	ASIAN - Non Hispanic
	HAWAIIAN / PACIFIC - Non Hispanic
	OTHER - Non Hispanic
	MULTI-RACE - Non Hispanic

Data from 2010 Census
Graphs represent 100% of population



Race and Ethnicity South Centennial / Aurora Arapahoe County



Race and Ethnicity East End Rural Area Arapahoe County

Legend

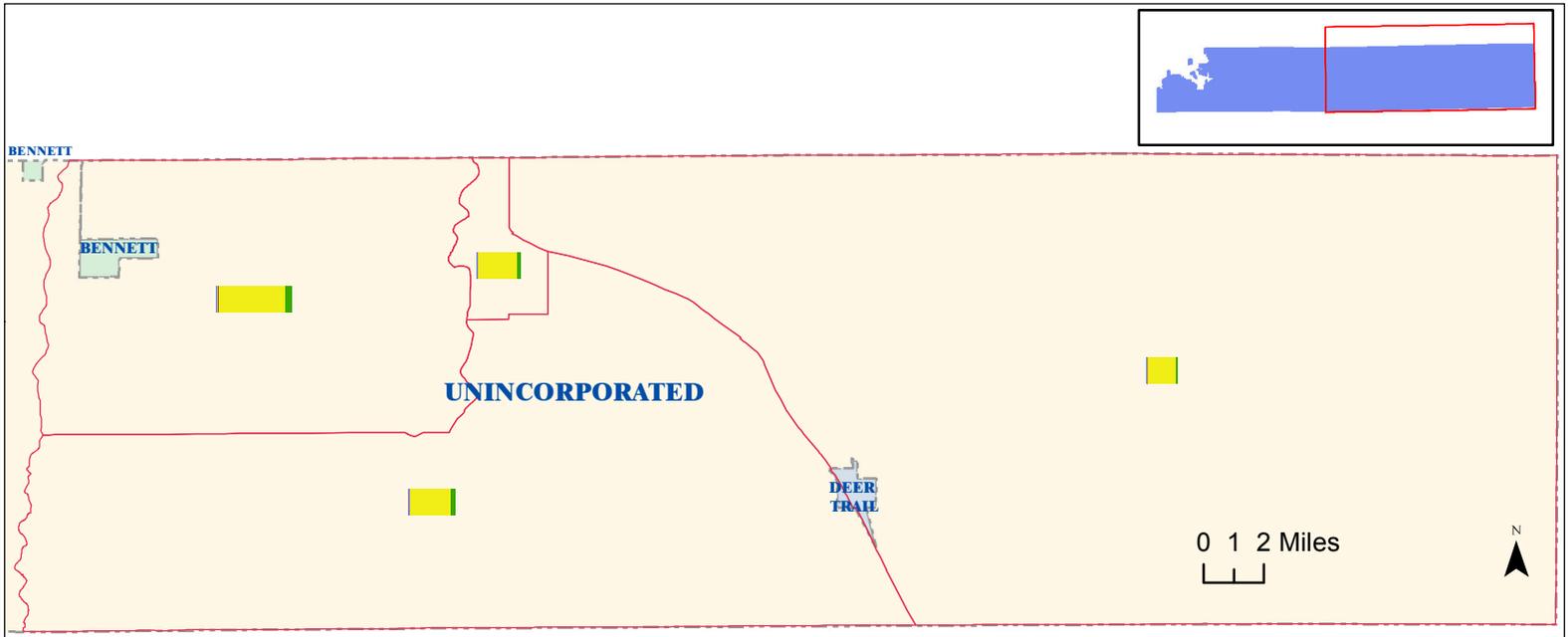
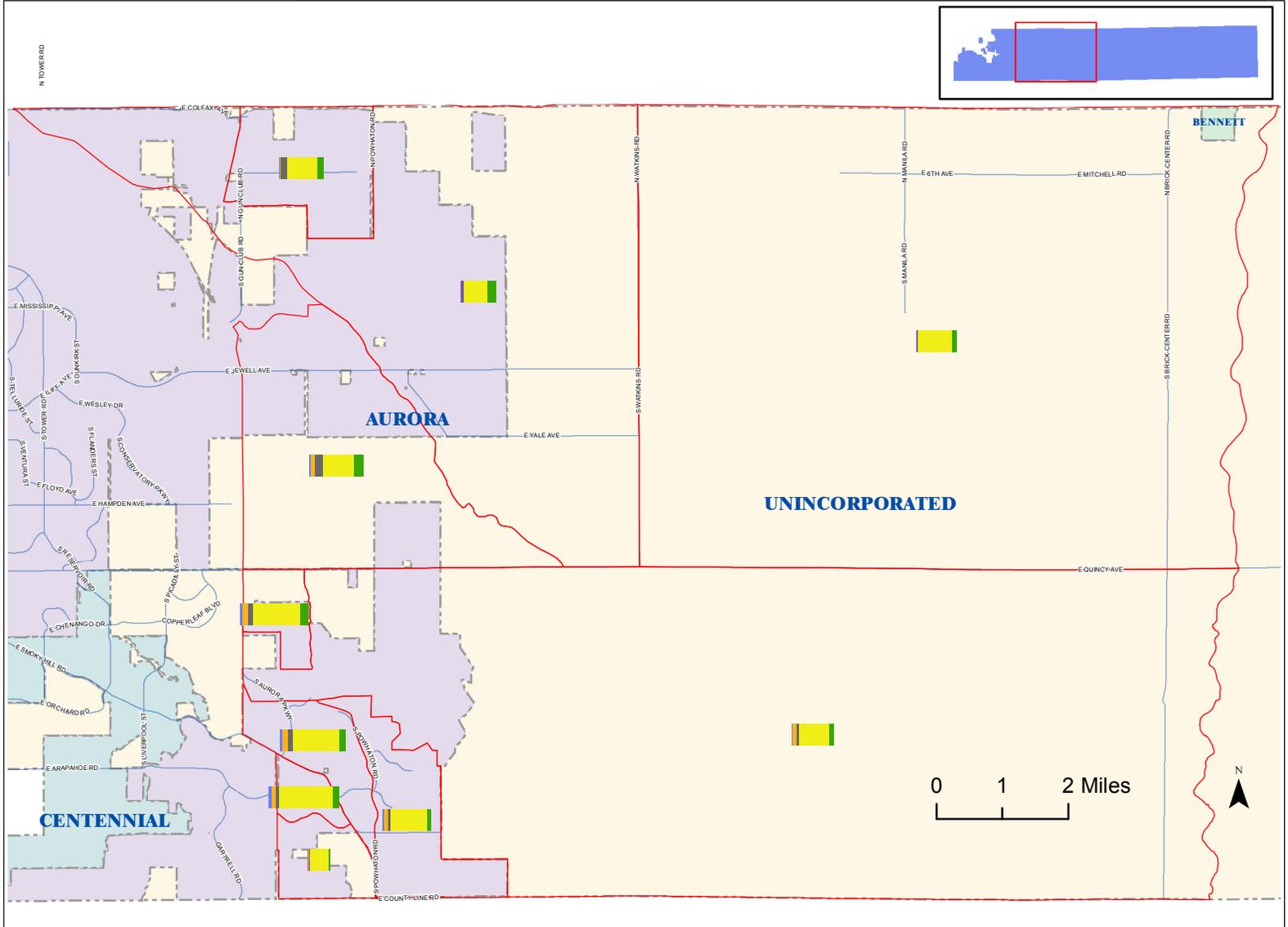
Jurisdictions

- AURORA
- BENNETT
- CENTENNIAL
- DEER TRAIL
- UNINCORPORATED

Race and Ethnicity

- HISPANIC
- WHITE - Non Hispanic
- BLACK - Non Hispanic
- AMERICAN INDIAN - Non Hispanic
- ASIAN - Non Hispanic
- HAWAIIAN / PACIFIC - Non Hispanic
- OTHER - Non Hispanic
- MULT-RACE - Non Hispanic

Data from 2010 Census
Graphs represent 100% of population



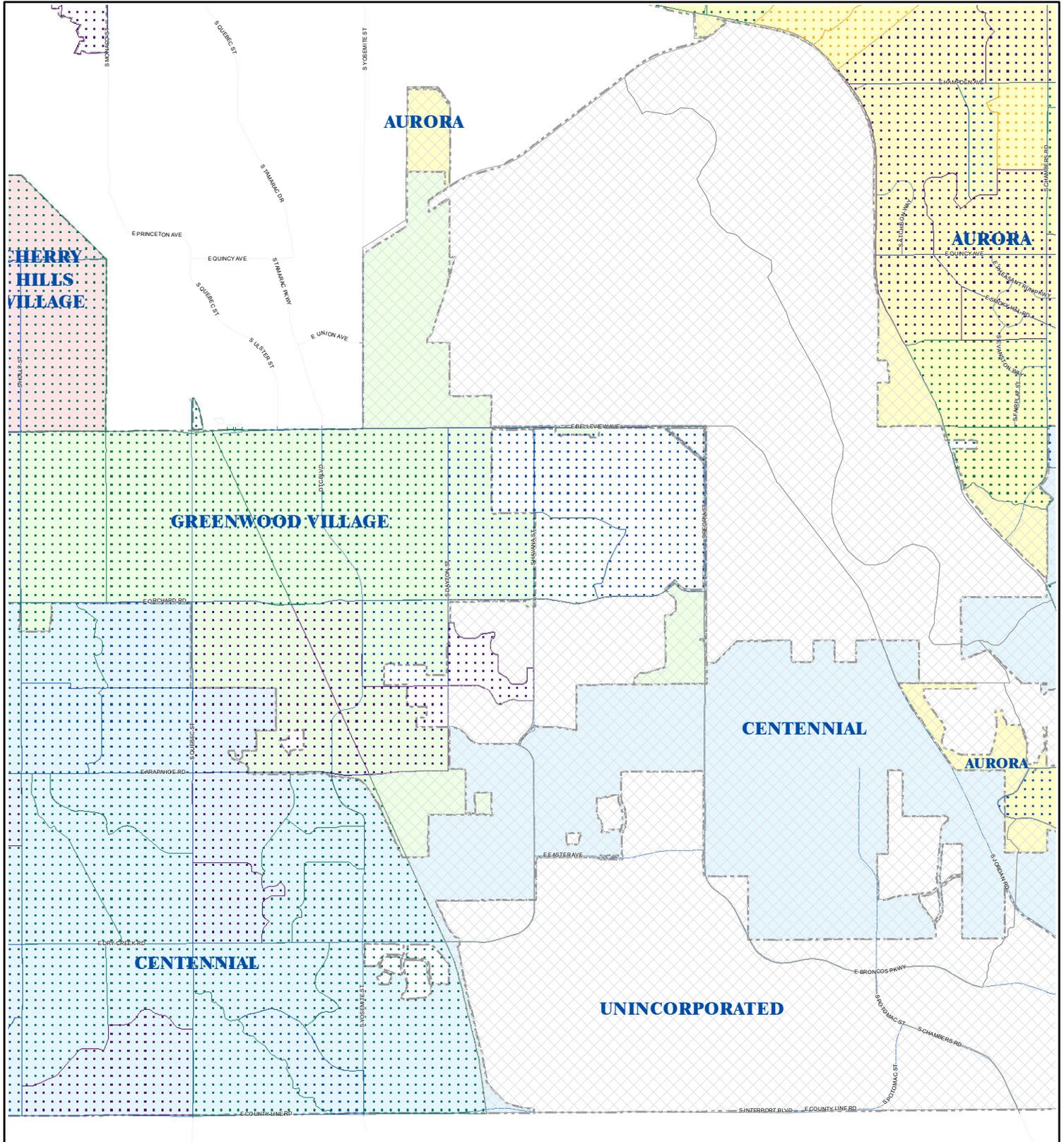
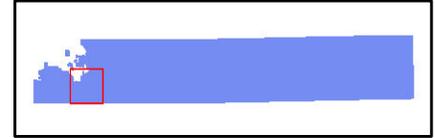
Map #2 – Low Income Concentrations, Arapahoe County

Percent of LowMod Households Central Urban Area in Arapahoe County

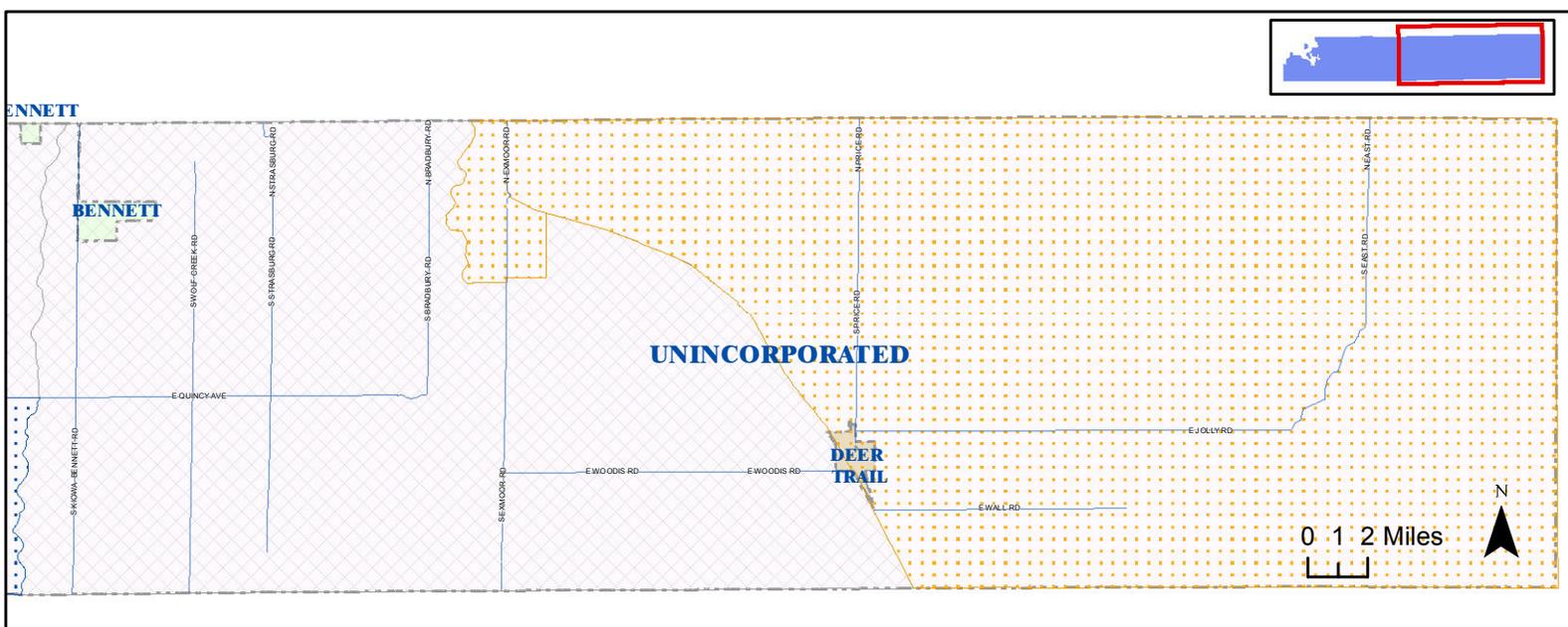
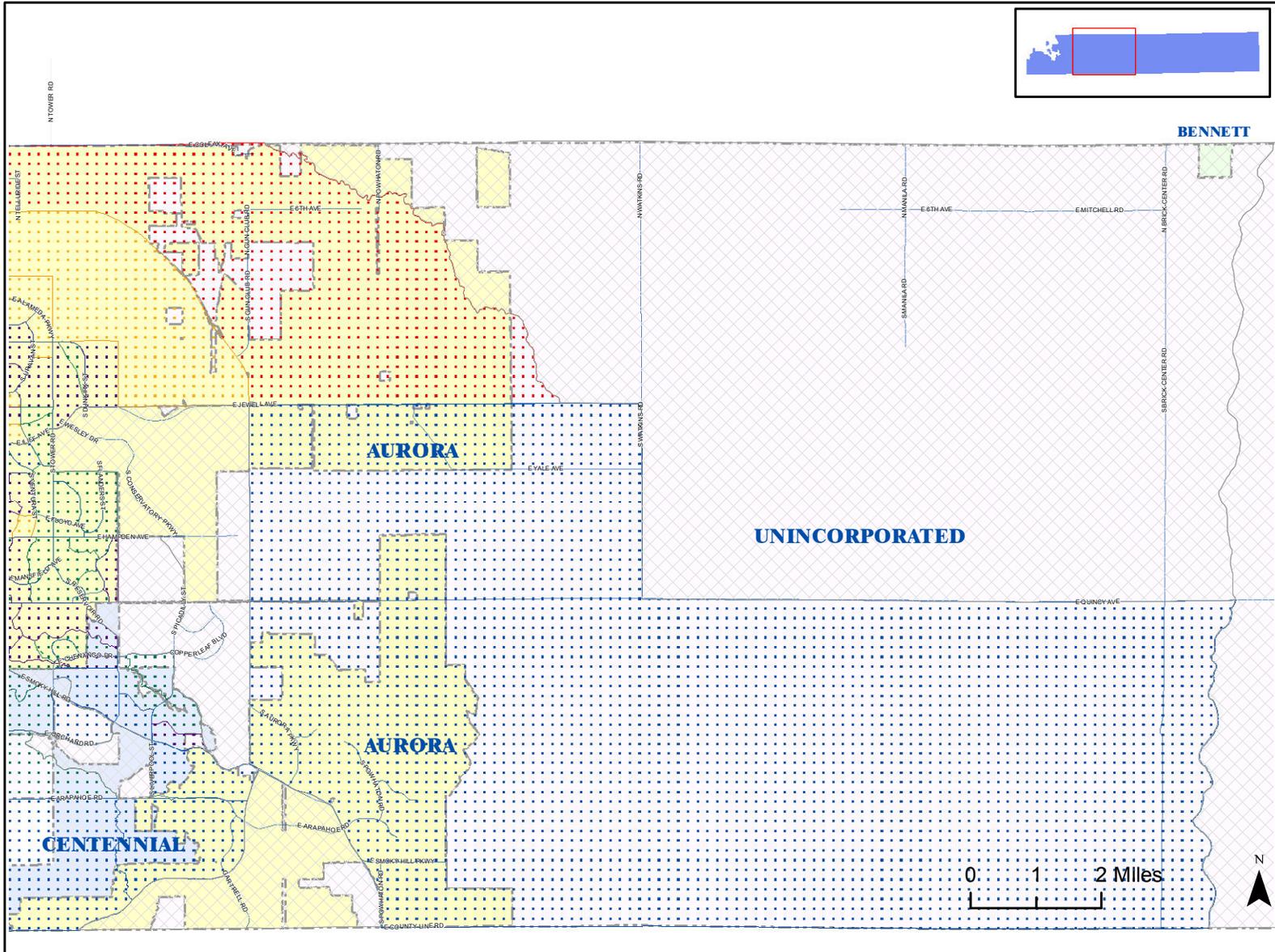
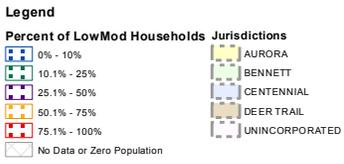
Legend

Percent of LowMod Households		Jurisdiction
0% - 10%	(White)	AURORA
10.1% - 25%	(Light Blue)	CENTENNIAL
25.1% - 50%	(Light Green)	CHERRY HILLS VILLAGE
50.1% - 75%	(Light Yellow)	ENGLEWOOD
75.1% - 100%	(Light Purple)	GREENWOOD VILLAGE
No Data or Zero Population	(White with cross-hatch)	UNINCORPORATED

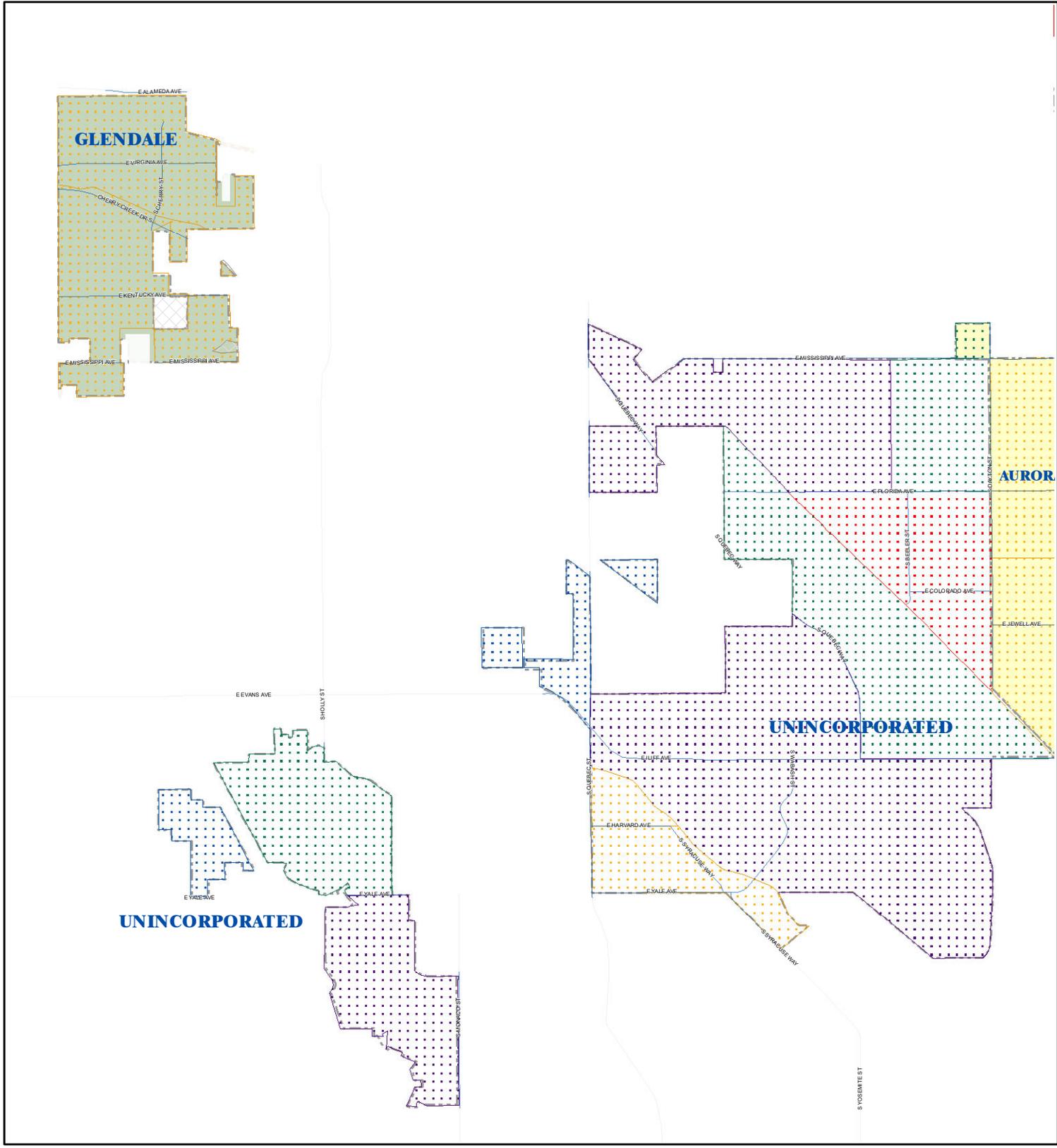
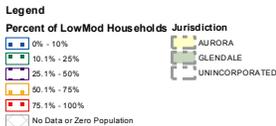
Source: American Community Survey 5 year data 2007-2011



Percent of LowMod Households in East End Rural Area of Arapahoe County

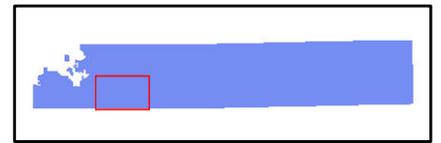


Percent of LowMod Households Four Square Mile Area in Arapahoe County



Source: American Community Survey 5 year data 2007-2011

Percent of LowMod Households South Aurora in Arapahoe County



Legend

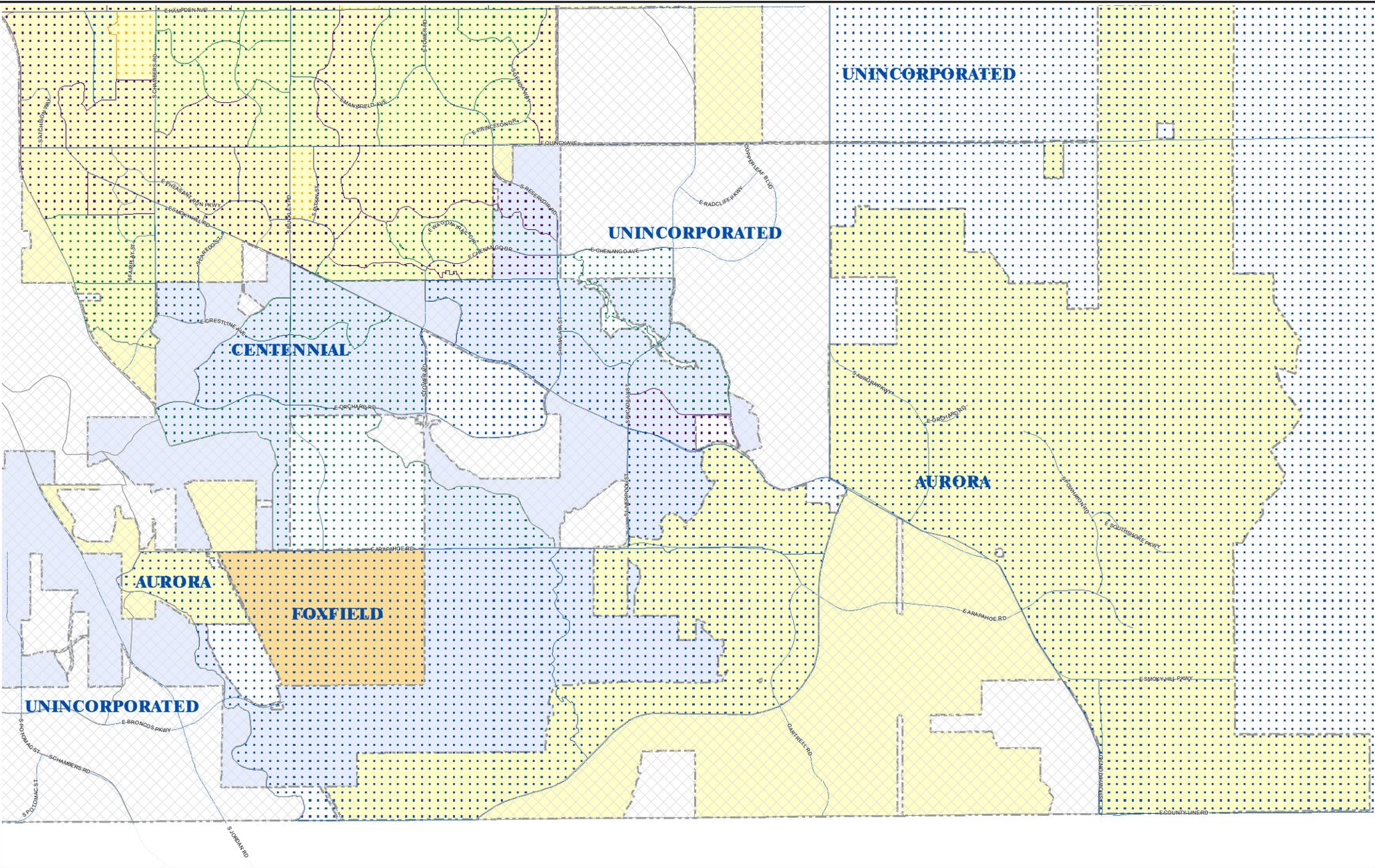
Percent of LowMod Households

- 0% - 10%
- 10.1% - 25%
- 25.1% - 50%
- 50.1% - 75%
- 75.1% - 100%
- No Data or Zero Population

Jurisdictions

- AURORA
- CENTENNIAL
- FOXFIELD
- UNINCORPORATED

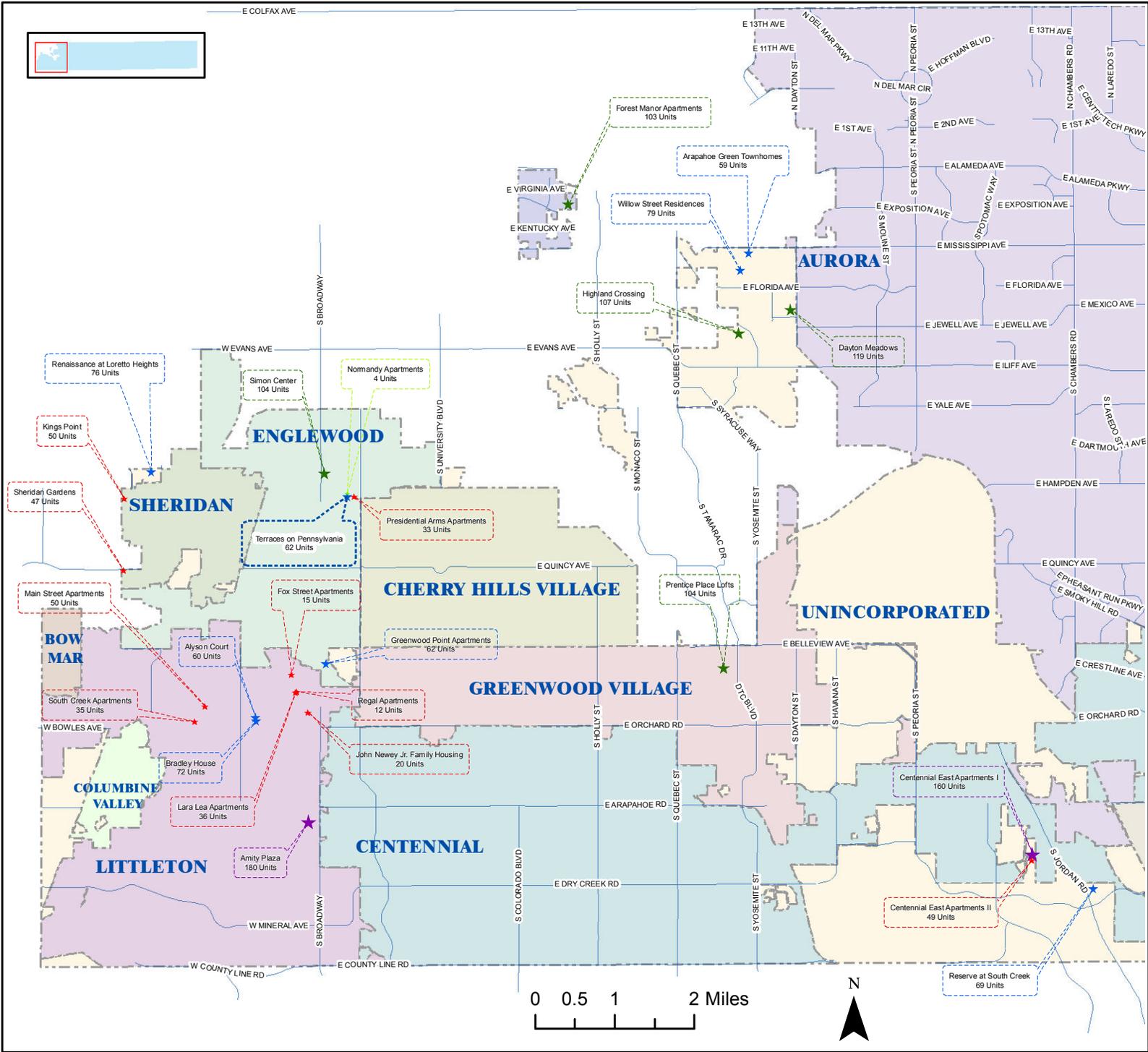
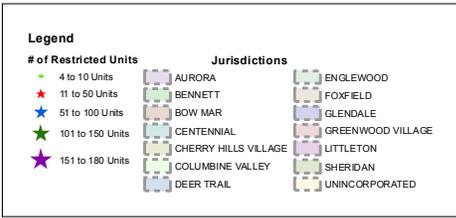
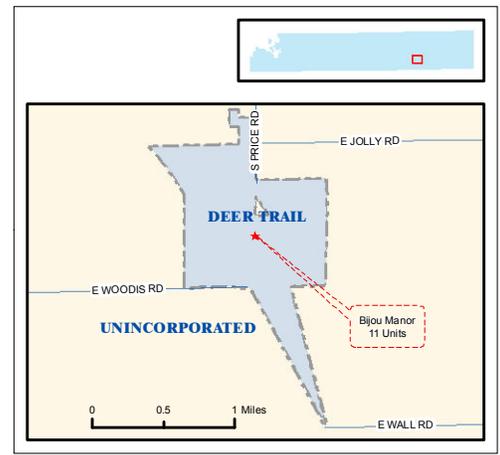
Source: American Community Survey 5 year data 2007-2011



Map #3 – Group Home Locations, Arapahoe County

Map #4 – Affordable Rental Housing Locations, Arapahoe County

Affordable Housing in Arapahoe County



APPENDIX D: PARTICIPATING AGENCIES, ORGANIZATIONS AND BUSINESSES

Governmental:

Linda Haley, Senior Resource Manager, Arapahoe County Housing and Community Development
Liana Escott, Arapahoe County Housing and Community Development
Nancy Fenton, Englewood Community Development
Janet Grimmet, Harold Stitt, City of Englewood
Devin Granberry, City of Sheridan
Renee Tullius, Englewood Housing Authority
Jan Yeckes, Arapahoe County Planning Division
Julio Iturreria, Chris Conrad, Arapahoe County Planning Division

Advocacy/Housing Providers, and Industry Representatives:

Jacqueline Jenkins, Homestart Realty
Melissa Moran, Comitis Family Services
Deborah Grigsby, Colorado Community Media
Ashley Cloutier, Denver Fair Housing Center
Joyce Alms-Ransford, Archway Housing
Jo Ellen Davidson, Community Housing Development Association (CHDA)
Dan Dawson, Aurora Mental Health
Scott Shields, Family Tree
Dan Burnham, Linda Conway, Jo Hamit, South Metro Housing Options
Laura Thompson, HERO Alliance
Matt VanAuken, Development Pathways
Paula McIntire, Developmental Pathways
Wendy Zerfas, Arapahoe House
Eugene Medina, Arapahoe House
Linda James, Gateway Women's Shelter
Bob Dorshimer, Mile High Council
Kathryn Arbour, Rebuilding Together
Jo Rowan, Funding Partners
Jolynn Snyder, Family Promise
Sandra Blythe-Perry, Interfaith Community Services
Troy Gladwell, Medici Properties
Teresa Juarez, Aurora Mental Health
Katie Jensen, Arapahoe-Douglas Mental Health
Arturo Alvarado, Metro Fair Housing Center

PUBLISHER'S AFFIDAVIT

STATE OF COLORADO,)
) SS.
COUNTY OF ARAPAHOE)

I, Gerri Sweeney, do solemnly affirm that I am the Publisher of THE VILLAGER; that the same is a weekly newspaper published in Greenwood Village, County of Arapahoe, State of Colorado, and has a general circulation therein; that said newspaper has been continuously and uninterruptedly published in said County of Arapahoe for a period of at least 52 consecutive weeks prior to the first publication of the annexed notice, that said newspaper is entered in the post office at Englewood, Colorado, as periodical class mail matter and that said newspaper is a newspaper within the meaning of the Act of General Assembly of the State of Colorado, approved March 30, 1923, and entitled "Legal Notices and Advertisements," with other Acts relating to the printing and publishing of legal notices and advertisements. That the annexed notice was published in the regular and entire issue of said newspaper for the period of _____ consecutive insertions; that the first publication of said notice was in the issue of said newspaper dated:

September 26, 2013

and the last publication of said notice, was in the issue of said newspaper dated:

September 26, 2013

Gerri Sweeney

Publisher

Subscribed and affirmed to before me, a Notary Public.

This 27 day of September A.D., 2013

Pat McLachlan

Notary Public

Pat McLachlan
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20134030748
MY COMMISSION EXPIRES JUNE 1, 2017

My Commission expires

ARAPAHOE COUNTY, COLORADO NOTICE OF ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE (AI) DRAFT AND PUBLIC COMMENT PERIOD

NOTICE IS HEREBY GIVEN that the 2013 draft Analysis of Impediments to Fair Housing Choice (AI) is now available for public review and comment. As a recipient of Community Development Block Grant (CDBG), and HOME Investment Partnerships Grant funds from the U.S. Department of Housing and Urban Development (HUD), the County is required to submit an "affirmatively further fair housing" (AFFH) certification. As part of the Consolidated Plan, all federal funding grantees are mandated to submit this AFFH certification, which requires them to undertake Fair Housing Planning (FHP) through three steps: 1) Conduct an analysis to identify impediments to fair housing choice within the jurisdiction; 2) Take appropriate actions to overcome the effects of any impediments identified through the analysis; and 3) Maintain records reflecting the analysis and actions taken in this regard.

The AI presents a demographic profile of the County except the City of Aurora, assesses the extent of fair housing issues among specific groups, and evaluates the availability of a range of housing choices for all residents. The AI also analyzes the conditions in the private market and public sector that may limit the range of housing choices or impede a person's

access to housing.

For more details, please see the draft Analysis of Impediments to Fair Housing Choice posted on Arapahoe County's website at: <http://www.arapahoegov.com/index.aspx?NID=334> under the Plans & Reports section.

Copies of the draft AI will be available for public review at the following locations:

Arapahoe County

Arapahoe County
Housing and Community Development
Services Administration Building
1690 W. Littleton Blvd. #300

5334 S. Prince St.
Littleton, CO 80120

Littleton, CO 80120
Phone (303) 738-8040

Phone (303) 795-4400
Monday - Friday 8am to 4:30pm

Monday - Friday 8am to 4:30pm

City of Centennial

City of Englewood
Centennial Civic Center

Englewood Civic Center
13133 E. Arapahoe Rd.

1000 Englewood Pkwy.
Centennial, CO 80112

Englewood, CO 80110
Phone (303) 325-8000

Phone (303) 782-2300
Monday - Friday 8am - 5pm

Monday - Friday 8am - 5pm

City of Littleton

City of Sheridan
2255 W. Berry Ave.

4101 S. Federal Blvd.
Littleton, CO 80120

Sheridan, CO 80110
Phone (303) 795-3700

Phone (303) 782-2200

Monday - Friday 8am - 5pm

Monday - Friday 8am - 5pm

The County is requesting public input on the draft AI. Written comments or questions on the AI will be accepted during the 30-day comment period from September 26 to October 25, 2013. Persons with comments or questions concerning the AI may contact: Linda Haley, Housing and Community Development Services Manager, 303-738-8089; lhaley@arapahoegov.com; (HCDS) 1690 W. Littleton Boulevard, #300 Littleton, CO 80120-2069, Main (303) 738-8040.

Arapahoe County does not discriminate on the basis of age, color, religion, sex, national origin, familial status or disability in the admission or access to, or treatment or employment in its federally assisted programs or activities. Linda Haley is designated to coordinate compliance with the nondiscrimination requirements contained in the U.S. Department of Housing and Urban Development's regulations and may be reached at 303-738-8089; lhaley@arapahoegov.com; Arapahoe County Housing and Community Development Services (HCDS) 1690 W. Littleton Boulevard, #300 Littleton, CO 80120-2069.

Arapahoe County is committed to making its public meetings, programs, and services accessible to persons with disabilities and limited English proficiency. If you need accommodations, contact the Arapahoe County Housing and Community Development Services (HCDS) Manager, Housing and Community Development Services, 1690 W. Littleton Blvd., Littleton #300, CO 80120, Tel. (303) 738-8040, TDD (303) 738-8033, Fax (303) 738-8089, lhaley@arapahoegov.com. Please contact our office in advance to make necessary arrangements.

Published in the Villager
First Published September 26, 2013
Legal #: 3583

3583