



Analysis of Impediments to Fair Housing Choice

**Prepared for the City of Loveland
Community Partnership Office**

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Executive Summary

This report is the 2012 update to the City of Loveland's Analysis of Impediments to Fair Housing Choice (AI) and was prepared as a requirement of the U. S. Department of Housing and Urban Development (HUD). The report was developed using HUD's "Fair Housing Planning Guide", as well as guidance provided by representatives of the Denver Fair Housing and Equal Opportunity Office (FHEO).

Impediments to fair housing choice are:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, national origin, sexual orientation, or gender identity which restrict housing choice or the availability of housing choice; or
- Any actions, omissions, or decisions which have the effect of restricting housing choice or the availability of housing choice on the basis of race, color, religion, sex, disability, familial status, national origin, sexual orientation, or gender identity.

The previous Impediments to Fair Housing Choice report completed for the City of Loveland included items that were more related to affordable housing than to fair housing choice. HUD has recently provided guidance and clarification that "a barrier to affordable housing is a condition or circumstance that impedes housing choice on an equal opportunity basis" while an impediment to fair housing choice is "a condition or circumstance that impedes housing choice or access to housing based on one or more of the protected classes of the Fair Housing Act". A barrier to affordable housing may also be an impediment to fair housing choice; however, if barriers to affordable housing are also identified as impediments to fair housing choice, an analysis must be provided to explain how the barrier to affordable housing disproportionately impacts members of a protected class.

Methodology

The preparation of this report included the following steps:

- a. Review of existing data on demographics, income and employment, housing, zoning and land use, adopted policies and plans, lending and development policies;
- b. Interviews conducted with staff and/or representatives of more than 35 participating agencies and organizations;
- c. Review and analysis of housing discrimination complaint data;
- d. Analysis of the results of a questionnaire distributed to over 900 clients of area agencies and organizations; and
- e. Identification of impediments and actions to address them.

In addition to the interviews conducted to gather information for the preparation of this report, a questionnaire was used to gather input from the public. The questionnaire was given to 14 participating agencies that distributed more than 900, in both English and Spanish, to their clients. A summary of key points from the questionnaires is listed below. For a copy of the questionnaire see Appendix A.

- 309 questionnaires were completed and returned prior to the cutoff date of July 31, 2012, a 34.0% return rate (an additional 8 were returned after the cutoff date and are not included in the data).
 - Of the completed questionnaires, 4.0% were in Spanish and 96.0% were in English.
 - Homeless persons accounted for 20.0% of those completing questionnaires.
 - Apartments are the single most common form of housing (47.0%). Just over 1.0% of respondents live in a vehicle, under a bridge, camping, or in shelters, while others stay with family or friends.
 - 22.0% have lived in their current housing for 1-2 years.
 - 30.0% of the housing units have 2-bedrooms.
 - 24.0% are living alone.
 - 23.0% of families have children under the age of 5.
 - More than half spend 50.0% or more of their income on rent and utilities.
 - The key areas that have been a problem for people when looking for housing are: income too low, can't afford the deposit, can't afford the rent, and credit history issues.
 - Housing cost or affordability and security deposits are the primary reasons that people stay where they are currently living.
- People believe they have been denied housing in Loveland based on race or color, national origin, gender, family size or type, disability, and religion, but only one person filed a discrimination complaint.
 - The reasons for not filing a housing discrimination complaint include not thinking he or she had a complaint, not knowing how to file a complaint, not having the time or wanting to file, and not speaking English.

2012 Impediments and Fair Housing Action Plan

Housing discrimination: Housing discrimination appears to be taking place, particularly for persons with disabilities, in the area of reasonable accommodations. Many people, including both tenants and landlords, may not understand housing discrimination: what it is, how it occurs, and what they can do about it. Nor do they understand reasonable accommodations required by the Americans with Disabilities Act.

Language and culture: Language is a barrier to fair housing choice and is particularly difficult when the process of renting or buying a place to live is involved. More people who speak

languages other than English or Spanish are relocating to Loveland and translation services may be needed for these other languages. Marketing to these groups will be essential.

A lack of affordable housing units disproportionately affects some protected populations, including accessible housing for persons with disabilities and housing for single-female parent families. The disproportionality analysis for this report showed that persons with disabilities and families headed by a single-female are more likely to be living in publicly-assisting housing and could benefit from additional affordable housing.

Hispanic/Latino households appear to have higher mortgage loan denial rates than non-Hispanic/Latino households. The reasons behind these higher loan denial rates may be simply due to credit history or related issues, but this cannot be determined from the available data and is a consideration that should be monitored (see Tables 27 and 28 for more information about mortgage disclosure data and loan denial reasons).

Barriers to Affordable Housing

In addition to the impediments to fair housing choice identified above, several items that function as barriers to affordable housing in Loveland were noted during interviews and are included in this report. These items were also identified in 2007 as impediments. They are:

- Land development costs, development fees, and some development standards
- Nimby (Not in My Back Yard) syndrome
- Foreclosures, credit history, and income
- Lack of emergency and transitional housing units for homeless families and individuals and a lack of affordable housing for all populations
- Transportation

Additional information about these impediments and the City of Loveland Action Plan can be found in SECTION FIVE, starting on page 62.

SECTION FIVE of this document will be translated into Spanish upon request. Please send an email to alison.hade@cityofloveland.org.

SECTION FIVE is available in LARGE PRINT upon request. Please call (970) 962-2517.

SECTION ONE

Introduction

This report is the 2012 update to the City of Loveland's Analysis of Impediments to Fair Housing Choice (AI) and was prepared as a requirement of the U. S. Department of Housing and Urban Development (HUD). The report was developed using HUD's "Fair Housing Planning Guide" for content and format, as well as guidance provided by representatives of the Denver Fair Housing and Equal Opportunity (FHEO) Office.

1. Purpose

The intent of this report is to update information gathered in the City's 2007 AI; review the impediments identified to determine if they still exist; evaluate the effectiveness of actions taken since 2007; and identify any new impediments that may exist, as well as actions recommended to address them. The actions identified in this report are intended to affirmatively further fair housing choice by reducing and/or eliminating the impediments that have been identified. These actions 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;
- Promote housing that is physically accessible to and usable by all persons, particularly persons with disabilities; and
- Foster compliance with the non-discrimination provisions of the Fair Housing Act.

2. Methodology

The preparation of this report consisted of the following steps:

- a. Review of existing data on demographics, income and employment, housing, zoning and land use, adopted policies and plans, and lending and development policies;
- b. Interviews conducted with staff and/or representatives of over 35 agencies and organizations;
- c. Review and analysis of housing discrimination complaint data;
- d. Analysis of the results of a questionnaire distributed to over 900 clients of area agencies and organizations; and
- e. Identification of impediments and actions to address them.

3. Participating Agencies and Organizations

The list below includes all participating agencies and organizations. The agencies noted with an * were interviewed, while the others provided information used in the preparation of this report.

- *Adams Mortgage
- *Alternatives to Violence
 - Aspen Homes of Colorado
 - Catholic Charities of Larimer County
- *Center for Adult Learning - Front Range Community College
- *City of Loveland Affordable Housing Commission
- *City of Loveland Building Inspection Office
- *City of Loveland Community Partnership Office
- *City of Loveland Current Planning Division
- *City of Loveland Disabilities Advisory Commission
- *City of Loveland Economic Development Office
- *City of Loveland Human Services Commission
- *City of Loveland Planning Commission
- *City of Loveland Transit (COLT)
 - City of Loveland Utility Billing
- *Colorado Civil Rights Division
 - Colorado Department of Education
 - Colorado Department of Labor and Employment
 - Colorado Department of Local Affairs, Division of Housing
 - Colorado Department of Public Health and Environment
- *Colorado Legal Services
 - Community Kitchen
- *Disabled Resource Services
- *Ensign Skills Center
 - 1st Bank
 - Food Bank for Larimer County
 - Foothills Gateway
- *Funding Partners of Larimer County
- *Green Path (formerly Consumer Credit Counseling)
- *House of Neighborly Service
- *Housing Authority of the City of Loveland
- *Intercultural Community Builders
- *Interfaith Hospitality Network
 - Larimer County Area Agency on Aging
 - Larimer County Health and Human Services
 - Larimer County LEAP

Larimer County Planning

- *Loveland-Berthoud Area Board of Realtors
- *Loveland Habitat for Humanity
- *Loveland Midtown Development
- *McWhinney Enterprises
- *Matthews House
- *Neighbor to Neighbor
- *Northern Colorado AIDS Project (NCAP)
- *Project Self-Sufficiency
- *Remax Advanced, Inc.
- Respite Care
- Retired & Senior Volunteer Program (RSVP)
- Senior Alternatives in Transportation (SAINT)
- *Teaching Tree Early Childhood Learning Center
- *The Group Real Estate
- *Thompson R2-J School District
- Thompson Valley Pre-School
- *Touchstone Health Partners (formerly Larimer Center for Mental Health)
- Town of Berthoud
- Town of Johnstown
- Town of Windsor
- *United States Department of Housing and Urban Development, FHEO, Region VIII
- United Way of Larimer County
- Wells Fargo
- *WINGS Center

4. Public Involvement

The public was involved in the development of this report in several ways. First, information was gathered through research and over 35 interviews conducted by the consultant with the staff and/or representatives of many of the participating agencies and organizations. More than 60 different housing organizations, governmental agencies and advocacy groups involved in housing issues, housing providers, financial institutions, educational institutions and other organizations involved or interested in housing issues were contacted, or provided information used for this report.

Fourteen of the participating agencies and organizations distributed more than 900 questionnaires to their clients to gather information on housing issues faced by clients and to assist in the identification of impediments. The following agencies distributed questionnaires:

Alternatives to Violence
Center for Adult Learning

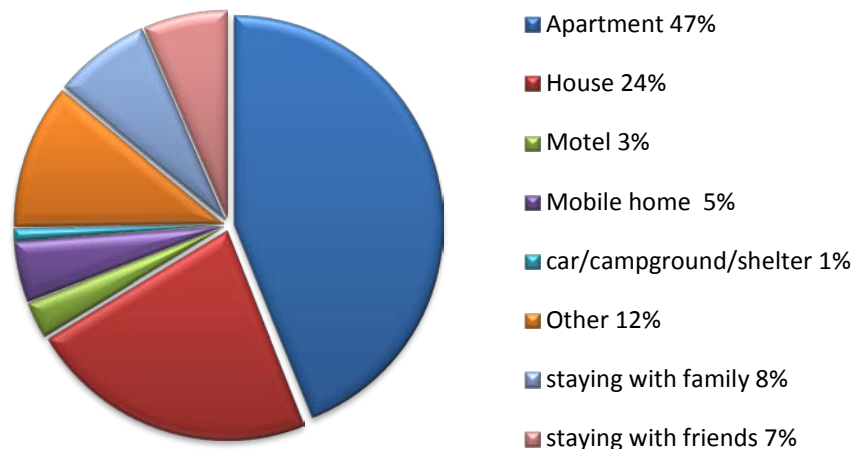
Community Kitchen
 Disabled Resource Services
 Food Bank for Larimer County
 House of Neighborly Service
 Housing Authority of the City of Loveland
 Interfaith Hospitality Network
 Loveland Habitat for Humanity
 Matthews House
 Neighbor to Neighbor
 Project Self-Sufficiency
 Respite Care
 Touchstone Health Partners (formerly Larimer Center for Mental Health)

Several key points about the questionnaire:

- 309 were completed – a 34.0% return rate
- Of persons that completed questionnaires, 4.0% were Spanish speakers and 96.0% were English speakers
- Homeless persons accounted for 20.0% of questionnaire respondents

The results of the questionnaires are summarized below. Some questions were not answered, or were not applicable, so the corresponding percentages will not add up to 100%. Additional detail on the “other” responses can be found in Appendix A.

Q 1.What type of housing are you living in now?



Rent: 46% Own: 9%

Q2. How long have you lived there?

Less than 3 months - 16%
3-6 months – 13%
6 – 12 months – 10%
1-2 years - 22%
3-5 years – 19%
More than 5 years – 19%

Q3. How many bedrooms does this housing have?

Studio: 6%
1 - 26%
2 - 30%
3 - 25%
4 - 6%
5+- 1%

Q 4. Including you, how many people live in this housing:

1 – 24%
2 – 22%
3 – 19%
4 – 14%
5+ - 20%

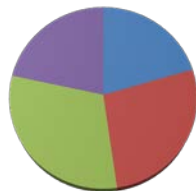
How many are adults:

1 – 36%
2 – 23%
3 – 10%
4 – 5%
5+ - 2%

How many are children:

Under 5: 23%
Age 6 – 11: 13%
Age 12 – 15: 7%
Age 16 – 18: 4%

Q 5. How much of your income is spent on rent and utilities each month?



■ up to 30%
■ 30 - 50%
■ 50 - 75%
■ Over 75%

Q 6. Have any of the following things ever been a problem for you when looking for housing to rent or buy in Loveland?

I can't afford the *deposit*: 16%

My *income* is too low: 21%

I have *credit history* issues: 13%

Lack of housing I can *afford to rent*: 17%

Housing I can afford is too far away from *bus routes*: 2%

From *work*: 3%

From *schools*: 2%

I don't have my own *transportation*: 6%

I can't get *bus service* close to my home/work/services I need: 2%

Housing was *too small/too big* for the number of people in my family: 5%

Landlord refused to make an *accommodation* for my disability: 1%

I can't get housing information in *Spanish or other language*: 1%

Lack of housing I can *afford to buy*: 7%

I can't find a *real estate agent* of the race/ethnicity/disability or gender I prefer: 1%

Real estate agents showed me housing I could afford only in certain areas: 1%

I was given a loan with a higher *interest rate* than normal: 1%

Other: 4%

Q 8. Have you ever been denied housing in Loveland for any of the following reasons?

Race/color: 26%

National origin: 7%

Gender: 4%

Family size or type: 26%

Disability: 15%

Religion: 0%

Other: 22%

Did you file a discrimination complaint?

Yes: 1% (1 complaint filed)

No: 73%

Why didn't you file a complaint?

Didn't think I had a complaint: 44%

Didn't know how to file a complaint: 20%

No time/didn't want to: 9%

Other: 27%

If you filed a complaint, what happened with your complaint?

Status of one complaint filed cannot be determined from the information provided.

A draft of this report was released for a public comment period from November 22, 2012 through December 21, 2012 on-line via the Community Partnership Office webpage and Facebook page; it was also sent to the interviewed agencies and to the relevant City of Loveland boards and commissions. A hard copy was available in the library. Relevant notices indicated that SECTION FIVE would be translated into Spanish upon request and made available in large print. The locations of the document were announced to all CPO distribution lists. Finally, the report was presented to the Loveland City Council for adoption of the report at the December 18, 2012 City Council meeting.

Any public comments received can be found in Appendix B.

SECTION TWO

Community Profile

This section of the Analysis of Impediments to Fair Housing Choice (AI) provides a snapshot of demographic and economic data for Loveland, Colorado. It focuses on changes that have taken place since the last AI report was completed in 2007. Data from the 2010 Census and American Community Surveys was used, as well as information provided by many of the local agencies and organizations interviewed for this report. Some data is specific to Loveland, while other data includes Larimer County or the Fort Collins-Loveland Metropolitan Statistical Area (MSA).

Loveland, Colorado is located in Larimer County, in Northern Colorado, and is the second largest city in the area. The community is generally bounded by I-25 on the east, Highways 402 and 60 on the south (14th Street SE and 42nd Street SE respectively), the foothills on the west, and County Road 30 on the north (71st Street). It is bisected in a north/south fashion by U. S. Highway 287, which forms a one-way couplet with Cleveland Avenue southbound and Lincoln/Garfield Avenue northbound. The community is also split in an east/west fashion by U. S. Highway 34 (Eisenhower Boulevard), which is the city's primary interchange with I-25. State Highway 402 is the southernmost interchange with I-25; however, this area has not experienced development to date. Over the past five years, residential development has primarily taken place in the northwestern area of the city and in the eastern area in the Millennium/Centerra development. The Highway 34 corridor (Eisenhower Boulevard) is the major commercial corridor in the community, from I-25 to the foothills on the west side of Loveland.

1. Demographics

The 2000 population in Loveland was 50,608 and by 2012, population has grown to 68,825 – an increase of 36.0%. The largest increase occurred between 2002 and 2003, when the city's population grew by more than 4,500 persons. Table 1 on the next page shows the annual population and rate of growth in Loveland since 2000.

Table 1: Population Growth Rate: 2000 - 2012

Year	Population	Growth Rate %
2000	50,608	----
2001	52,825	4.38
2002	55,582	5.22
2003	58,172	4.66
2004	60,115	3.34
2005	61,871	2.92
2006	64,123	3.64
2007	65,710	2.47
2008	65,956	0.37
2009	66,132	0.26
2010	66,859	1.09
2011	67,581	1.07
2012	68,825	1.84

Source: City of Loveland Annual Data and Assumptions Report February 22, 2012;
U. S. Census Bureau 2000 & 2010; American Community Survey 2005 - 2009

Table 2 below shows 5-year population projections beginning with 2015. These projections, made by City staff, estimate that the 2035 population will reach 102,198, with an average of 2.35 persons per household. Household size has decreased from 2.49 persons per household in 2000.

Table 2: Future 5-Year Population Projections: 2015 - 2035

Year	Population	Growth Rate %
2015	72,693	1.85 annual average
2020	80,390	2.00 annual average
2025	88,315	1.85 annual average
2030	95,506	1.50 annual average
2035	102,198	1.30 annual average

Source: City of Loveland Annual Data and Assumptions Report February 22, 2012;
U. S. Census Bureau 2010

Changes in the community's housing stock and household composition are also evident. Although growth rates have been slower over the past five years, between 2007 and 2012, the total number of housing units in the city increased from 27,010 to over 29,000 as shown on Table 3 on the next page.

Table 3: Total Housing Units: 2007 - 2012

Year	Number of Housing Units	Growth Rate %
2007	27,010	-----
2008	27,651	2.37
2009	27,691	0.14
2010	28,557	3.13
2011	28,703	0.51
2012	29,178	1.65

Source: City of Loveland Annual Data and Assumptions Report February 22, 2012

Table 4 illustrates the type and extent of housing units in Loveland. Single-family detached homes are still the most common, with an estimated 68.0% of all housing units of this type. Single-family attached units (townhomes) account for 11.0%, while 19.0% are multi-family or apartment units. Mobile homes make up 2.0% of all housing. Since 2000, the majority of units constructed in Loveland have been single-family detached. Between 2006 and 2010, the majority of new units constructed were multi-family units, most of which were in 2010.

Table 4: Housing Units by Type: 2010

Type	Number of Units	Percentage of Total Units
Single-family detached	19,419	68.0
Single-Family, attached	3,141	11.0
Multi-family	5,426	19.0
Mobile Homes	571	2.0
TOTAL	28,557	100.0%

Source: City of Loveland Annual Data and Assumptions Report February 22, 2012;
2010 American Community Survey

The number of female-headed households has increased from 1,931 in the 2000 Census to 2,872 in 2010, an increase of 48.7%. Male-headed households had an even larger increase of 54.9%. The number of non-family households increased by 56.8%.

Table 5: Loveland Households By Type: 2000 & 2010

Household Type	2000	2010	Percent Change
Married couple	11,347	14,160	24.8%
Female-headed single parent	1,931	2,872	48.7%
Male-headed single parent	759	1,176	54.9%
Non-family households	5,704	8,945	56.8%
Total Households	19,741	27,153	37.5%

Source: City of Loveland Annual Data and Assumptions Report February 22, 2012;
U. S. Census Bureau 2000 & 2010

An aging trend is evident in Loveland, as well as throughout Colorado and the nation. Loveland's median age in 2000 was 36.0 years; by 2010, this number had increased to 38.7. This increase in the median age is driven by the aging of baby boomers, people born between 1946 and 1964. This population will continue to have a large impact on housing and will

demand services geared to both their age and an active life style. In 2010, boomers were those persons between the ages of 45 and 64 and they accounted for 27.1% of Loveland's population. The female population grew from 51.0% in 2000 to 51.7% by 2010, and the male population decreased accordingly, from 49.0% to 48.3% over the decade.

Table 6: Age and Gender of Residents: 2000 & 2010				
YEAR	2000 - #	2000 - % of total	2010 - #	2010 - % of total
Total Population	50,608		66,859	
Under 5 years	3,552	7.0	4,521	6.8
5 – 9 years	3,771	7.5	4,582	6.9
10 – 14 years	3,956	7.8	4,211	6.3
15 – 19 years	3,623	7.2	4,191	6.3
20 – 24 years	2,684	5.3	3,752	5.6
25 – 34 years	6,892	13.6	8,989	13.4
35 – 44 years	8,619	17.0	8,609	12.9
45 – 54 years	7,076	14.0	9,772	14.7
55 – 59 years	2,290	4.5	4,523	6.8
60 – 64 years	1,821	3.6	3,755	5.6
65 – 74 years	3,192	6.3	5,214	7.8
75 – 84 years	2,321	4.6	3,226	4.8
85 years and over	811	1.6	1,514	2.3
Gender				
Females	25,813	51.0	34,560	51.7
Males	24,795	49.0	32,299	48.3
Median Age	36.0		38.7	
Source: U. S. Census Bureau - 2010				

In 2010, 91.5% of the population was Caucasian/White, down from 92.8% in the 2000 Census. This is indicative of a growing diversity in the community's population and reflects a similar population trend in Colorado and the nation. Persons of Hispanic/Latino origin comprised 11.7% of the population in 2010, up from 8.7% in 2000. Persons of Hispanic/Latino origin may also be of any race or a mix of races. Table 7 on the next page shows the race and ethnic composition in 2000 and 2010 for persons living in Loveland. Other population groups included in this data are African Americans, Native Americans/Native Pacific Islanders, and Asians, as well as the Other/Mixed races. The African American, Hispanic/Latino Origin and Native American/Pacific Islander populations show the largest rates of increase between 2000 and 2010. These increases may be a result of a greater awareness and interest in ancestry and race, as well as the nation's increasing diversity.

Table 7: Race and Origin of Population: 2000 & 2010

Race/Origin	2000	2010	Percent Change
Asian	419	669	59.7%
African American/Black	188	375	99.5%
Nat. American/Pac. Islander	349	568	62.8%
White/Caucasian	46,990	61,153	30.1%
Other/Mixed Races	2,662	4,094	53.8%
TOTAL Population	50,608	66,859	32.1%
Hispanic or Latino origin	4,337	7,816	80.2%

Source: City of Loveland Annual Data and Assumptions Report February 22, 2012

Table 8 on the following page shows the population of each Census Tract by race and Hispanic/Latino origin. The tracts with the highest non-White populations are 17.04, 18.04, and 20.05, while the tracts with the highest Hispanic/Latino populations are tracts 17.04, 17.07, and 20.05. Tract 17.04 is in southeast Loveland, south of Eisenhower Boulevard and east of Cleveland/Lincoln Avenue. Tract 17.07 is in northeast Loveland, between Highway 287 and Horseshoe Lake. Tract 18.04 is in central Loveland, around and north of Lake Loveland, and Tract 20.05 is in southwest Loveland between 1st and 14th Street SW and between Taft and Wilson Avenue.

While the tracts with higher minority or ethnic populations are dispersed in different parts of the community, Tract 17.04 appears to have a disproportionate rate of Hispanic/Latino residents. Disproportionality exists when the percentage of persons in a particular race or ethnic group is at least ten percentage points higher than the percentage of persons in that population as a whole. Tract 17.04 has 27.0% of its population of Hispanic/Latino origin, while the city-wide average is 12.0%. This disproportionate rate may exist because this area was established around the Great Western Sugar Factory, where Hispanic/Latinos and other immigrants provided the labor for sugar beet harvesting. Housing has remained more affordable in this area because the housing is older and smaller than homes in other areas of the community. Map 1 in Appendix C illustrates race and origin by census tract.

Table 8: Percent of Population by Race and Hispanic/Latino Origin by Census Tract: 2010

Census Tract	Asian	African American	Nat. Amer/ Pacific Island	White	Other/Mixed Races	Hispanic/Latino Origin
17.04	0%	1%	1%	89%	10%	27%
17.06	1%	2%	0%	92%	6%	15%
17.07	3%	1%	1%	90%	5%	17%
18.04	2%	1%	4%	83%	9%	9%
18.06	1%	1%	0%	95%	4%	15%
18.07	2%	0%	1%	93%	5%	7%
18.08	1%	1%	1%	95%	5%	6%
19.01	1%	1%	2%	90%	7%	11%
19.02	0%	0%	1%	96%	3%	13%
20.05	1%	0%	2%	88%	9%	16%
20.07	1%	1%	1%	92%	5%	9%
20.08	1%	1%	1%	91%	7%	10%
20.10	1%	1%	1%	97%	3%	4%
20.11	1%	1%	1%	95%	4%	6%
AVERAGE	1%	1%	1%	92%	6%	12%

Source: U. S. Census Bureau, 2010

Based on the 2010 Census, persons with disabilities accounted for 10.6% of the total population of people five years of age and older, for a total of 7,098 persons. In the 2000 Census, 14.3% of this same age group had a disability. Table 9 below summarizes this information. While the staff of Disabled Resource Services does not think there has been a reduction in the number of persons with disabilities, this statistical drop may be due to the use of estimates in the American Community Surveys since 2005. At the national level, 19.3% of the population five years of age and older has a disability. In persons 65 years of age and older, 35.0% had a disability in 2000, and 38.8% had a disability in 2010. Many veterans are returning home with disabilities, so this population is also expected to increase and will have specific housing needs.

Table 9: Disability Status of Population: 2000 & 2010

Status	2000	2010
Total non-institutionalized population (5 years and older)	50,608	66,859
With a disability	7,258 / 14.3%	7,098 / 10.6%
Under 18 years	11,775*	16,044
With a disability	887* / 7.5%	770 / 4.8%
18-64 years of age	28,833*	43,208
With a disability	4,156* / 14.4%	3,432 / 7.9%
65 years and over	6,175	7,473
With a disability	2,215 / 35.9%	2,896 / 38.8%

Source: U. S. Census Bureau – 2000, 2010

*Data from 2000 Census was collected using different age ranges (5 – 20; 21 – 64; and 65 and over). The 2010 Census used the ranges reflected in this table (under 18; 18 – 64; and 65 and over).

2. Education

Loveland is located in the Thompson R2-J School District. The district also serves a small area in southeast Fort Collins, as well as Berthoud and the surrounding unincorporated areas of Larimer County. The district's enrollment was 14,893 as of mid-May 2012, and includes schools in Berthoud, charter schools, the Thompson Online School, and an alternative high school, Ferguson High. The District has 23 elementary schools, nine middle schools, and seven high schools. Over 36.0% of all students qualified for free or reduced lunches during the 2011/2012 school year. Table 10 below provides this data.

Table 10: Thompson R2-J School District Student Enrollment: May 14, 2012		
Schools	Students	Percent of Total Enrollment
Elementary Schools (K-5)	6,910	46.4%
Middle Schools (6-8)	3,426	23.0%
High Schools (9-12)	4,557	30.6%
TOTAL Enrollment	14,893	100.0%
Free or Reduced Lunch	5,430	36.5%
Source: Thompson R2-J School District		

The Thompson School District's Integrated Early Childhood Program includes the Colorado Preschool Program (CPP), Head Start, and Children with Special Needs pre-school students. The program serves nearly 600 children up to the age of five. During the 2011/12 school year, 180 children were enrolled in CPP. Children who are homeless are given the highest priority for enrollment and of the 2011/12 students, 91.0% were from low-income households and 30.0% lived with a single parent.

Thompson Valley Preschool has served the Loveland area since 1973 as a non-profit pre-school with sliding-scale tuition. About 150 children from 140 families are served annually. Teaching Tree Early Childhood Learning Center has child care as well as pre-school classes when the public schools are in session and serves about 50 families each year. Some families are opting to send their children to preschool for one year, rather than two, due to the high cost of child care. For adults who work on Saturdays or Sundays, there are few child care options, since most child care centers are closed on the weekends.

Based on 2010 Census data, 93.6% of Loveland's population age 25 and over had a high school diploma and some higher level of education, while 36.8% had a Bachelor's degree or higher. The Center for Adult Learning had nearly 60 students receive their GED diploma at their 2012 graduation. Students at the center represent 27 different countries and speak 18 different languages. This data is summarized on Table 11 on the next page.

Table 11: Educational Attainment: 2010

Population 25 years and over	44,500	Percentage of Total
Less than 9 th grade	981	2.2%
9 th – 12 th grade (no diploma)	1,888	4.2%
High school graduate/GED	10,970	24.7%
Some college/no degree	10,236	23.0%
Associates Degree	4,053	9.1%
Bachelor's Degree	11,599	26.1%
Graduate/professional degree	4,773	10.7%
High school graduate or higher	----	2010 - 93.6% (2000 – 90.4%)
Bachelor's degree or higher	----	2010 - 36.8% (2000 – 27.7%)
Source: City of Loveland Annual data and Assumptions Report February 22, 2012;U. S. Census Bureau 2000		

3. Income and Employment

Minimum wage for 2012 in Colorado is \$7.64 up from \$7.36 in 2011 (the minimum wage rate in Colorado is adjusted annually for inflation). Table 12 below shows average monthly and annual wages by industry for Larimer County. This data is a measure of income for specific job categories, rather than a measure of household income. The highest average monthly wages were in the Management of Companies & Enterprises, and Manufacturing sectors. The lowest average weekly wages were in the Accommodation & Food Services, and the Arts/Entertainment/Recreation sectors.

Table 12: Average Hourly & Annual Wages in Larimer County: 2011

Industry	Average Monthly Wage	Average Annual Wage
Agriculture, forestry, fishing and hunting	\$526	\$27,352
Mining	\$946	\$49,192
Utilities	\$1,343	\$69,836
Construction	\$902	\$46,904
Manufacturing	\$1,525	\$79,300
Wholesale trade	\$1,075	\$55,900
Transportation and warehousing	\$780	\$40,560
Information	\$976	\$50,752
Finance and insurance	\$1,005	\$52,260
Real estate, rental, leasing	\$628	\$32,656
Professional and technical services	\$1,379	\$71,708
Management of companies/enterprises	\$1,443	\$75,036
Administrative and waste services	\$569	\$29,588
Educational services	\$751	\$39,052
Health care and social assistance	\$845	\$43,940
Arts, entertainment, recreation	\$454	\$23,608
Accommodation and food services	\$290	\$15,080
Other services (excluding public admin)	\$555	\$28,860
Public administration	\$1,081	\$56,212
Unclassified	\$1,338	\$69,576
TOTAL AVERAGE	\$810	\$42,120

Source: Colorado Department of Labor and Employment, Census of Employment and Wages

Table 13 below illustrates income distribution by household type for owner-occupied and renter-occupied households from the Larimer County Housing Needs Assessment that was completed as part of the City of Loveland 2010-2015 Consolidated Plan. The Area Median Income (AMI) in Loveland and Larimer County is currently \$77,700 based on a family size of four persons; however the data in the table below are based on an AMI of \$75,200 from 2007. Earning 30.0% or less of AMI is considered “extremely low income”, earning between 31.0% and 50.0% of AMI is “very low income” and between 51.0% and 80.0% of AMI is considered “low income”. More than 8,000 households in Loveland earn less than \$37,600 (50% AMI), with 4,100 of these being renter households.

Table 13: Larimer County Households by Type and Area Median Income (AMI): 2007			
AMI Range	Income	# Owners	# Renters
29% or less	0 - \$22,559	1,892	2,497
30 – 49%	\$22,560 - \$37,599	2,100	1,685
50 – 59%	\$37,600 - \$45,119	1,720	1,067
60 – 79%	\$45,120 - \$60,159	2,720	1,002
80 – 99%	\$60,160 - \$75,199	2,723	639
100%+	\$75,200* and above	7,318	779
TOTAL		18,473 households	7,585 households
Source: Larimer County Housing Needs Assessment, 2009 (Note: Data for this chart based on the 2007 AMI of \$75,200 for Larimer County, which is lower than current 2012 AMI of \$77,700)			

In 2012, poverty was defined in the United States by HUD as a household income of less than \$11,491 for one person and \$23,018 for a four-person household. Table 14 below summarizes the data from the 2010 Census (based on 2009 data). At that time, 9.7% of Loveland’s total population was living in poverty, while 9.0% of all families were living in poverty. Of the households headed by single females, 21.7% were living in poverty. For households that included children under the age of five years, the rate of poverty increased dramatically.

Table 14: Households Below Poverty Level: 2010	
Family Type	Percent Living Below Poverty Level
All Households	9.7%
w/children under 5 years of age	17.5%
All Family Households	9.0%
w/children under 5 years of age	19.7%
Married Couple Households	3.7%
w/children under 5 years of age	9.3%
Female Headed Households	21.7%
w/children under 5 years of age	46.6%
Source: U. S. Census Bureau, 2010	

According to the Colorado Department of Labor and Employment, Loveland had an unemployment rate of 7.9% in June 2012, with a drop to 7.7% in July 2012. Colorado’s rate was 8.2% in June and rose slightly to 8.3% in July 2012. These figures compare with the national

unemployment rate of 8.3% for July 2012.

Table 15 below lists the largest employers in the Loveland area. An employment range is given rather than a specific number of employees, since employment numbers are considered confidential information. The hospitals and Wal-Mart have locations in Fort Collins and/or Greeley while the other employers are located just in Loveland.

Table 15: Largest Employers: 2011

Employer	Employment Range	Industry Type
Lutheran Health Systems	2500 – 4999	Medical/surgical hospitals
Poudre Valley Health Care, Inc.	2500 – 4999	Medical/surgical hospitals
Wal-Mart Stores, Inc.	2500 – 4999	Retail superstore/warehouse club
Thompson School District R2J	2500 – 4999	School District
City of Loveland	500 – 999	Executive/legislative offices
Hach Chemical Company, Inc.	500 – 999	Analytical lab instrument manuf.
ELCA Good Samaritan Society	500 – 999	Nursing care
LPR Construction Co.	500 – 999	Structural steel/precast concrete
Group Publishing, Inc.	250 – 499	Periodical publishers
Agilent Technologies	250 – 499	Electrical instrument manuf.
US Engineering Co.	250 – 499	Plumbing/HVAC contractor

Source: Northern Colorado Economic Development Corporation

The October 2011 report titled “The Self-Sufficiency Standard for Colorado 2011” measures how much income a family must earn to meet basic living costs based on family size and composition. In Larimer County, a single parent with one preschooler and one school-age child would need an annual income of \$51,435 to be self-sufficient. In this instance, a household is self-sufficient when it does not need assistance with local costs for basic needs like housing, food, child care, health care, transportation, miscellaneous, and taxes. The median annual income for Larimer County in 2011 was \$25,941, which is less than half the amount needed to be financially self-sufficient. Of the 29 industries listed on Table 12 on page 17, only 40.0% provide a self-sufficient wage.

The Consumer Price Index (CPI) for urban consumers measures prices for consumer goods and services including food and beverages, housing, apparel, transportation, medical care, recreation, education, and communication, and other goods and services. Government-related user fees are also included. The index is a measure of the average change, over time, in the prices paid by urban consumers for goods and services and is based on a level (100) established between 1982 and 1984. The April 2012, CPI for the Denver-Boulder-Greeley area (including Loveland) was 229.815, which means that the cost of living for the Loveland area has more than doubled in the three decades since 1982 and is continuing to increase.

4. Housing

In the 2010 Census, there were 28,557 housing units in Loveland. Of these, 65.9% were owner-

occupied and 34.1% were renter-occupied units. The average sales price of housing units for the Loveland-Berthoud area has been dropping since 2007, but after a five-year low in 2009, the average price increased in 2010 and then dropped slightly in 2011. Projections for 2012 by The Group, Inc. real estate company, is that 1,458 homes will be sold at an average sales price of \$238,400 in the Loveland-Berthoud area. According to local real estate agents, homes under \$200,000 sell fairly quickly and are in short supply. Condominiums and townhomes are priced even lower, with some under \$100,000.

Table 16: Loveland-Berthoud Average Home Sales Prices: 2007 - 2011

Year	Average Price	Percent Change	Number Sold
2007	\$245,565	--	1,535
2008	\$240,610	-2.0%	1,386
2009	\$226,021	-6.0%	1,335
2010	\$235,264	+4.0%	1,342
2011	\$233,552	-1.0%	1,381
Projected for 2012	\$238,400	+2.0%	1,458
Source: The Group, Inc. – February, 2012			

From 2007 through 2011, the City of Loveland issued 648 building permits for new single-family detached units, 135 for new single-family attached (town homes) and duplex units, and 711 for multi-family units. Table 17 below illustrates the distribution of permits by year and type of housing unit, and shows an average of just under 300 new housing units per year. The large number of multi-family units built in 2010 was a result of the development of the Greens at Van de Water and the Lake Vista Apartments, which are both market rate apartment complexes. Another 220 apartment units are currently under review by City staff in Bristol Pointe, proposed at the southeast corner of Taft Avenue and 16th Street.

Table 17: Residential Building Permits Issued: 2007-2011

Year	Single-Family Detached	Single-Family Attached/Duplex	Multi-Family Units	Total Permits Issued
2007	217	64	0	281
2008	110	29	87	226
2009	66	3	6	75
2010	105	24	595	724
2011	150	15	23	188
TOTAL	648	135	711	1,494
Thru 6/30/12	132	-	68	200
Source: City of Loveland Building Division				

Through June of 2012, a total of 132 building permits were issued for new single-family detached homes and 68 for new multi-family units. Most of the homes built in 2012 are selling at prices higher than most low and moderate-income households can afford. Habitat for Humanity recently dedicated their 106th home and will complete four more by March 2013. Many of these homes will be built in the Willow Park Subdivision where Habitat acquired 12

lots, and in Boise Village North where the agency is about to purchase nine more. Willow Park is on the north side of Loveland, while Boise Village North is east of downtown.

Foreclosures in Larimer County decreased by more than 27.0% in 2011, with 1,329 filings made during the year. Sales of foreclosed homes decreased during this same period. For the first quarter of 2012, the number of foreclosure filings was 306, which may put 2012 numbers at the lowest over the past five years. While the first wave of foreclosures was primarily first-time homebuyers, recent foreclosures have involved homeowners from all income levels. Job losses, as well as adjustable rate mortgages, have created much of this recent problem. Homeowners who lost their homes to foreclosure and who now occupy rental units have added to a low rental vacancy rate in Loveland.

Table 18: Foreclosures in Larimer County: 2007 - 2011

Year	Foreclosure Filings	Sales of Foreclosed Homes
2007	1,588	1,006
2008	1,644	791
2009	2,091	817
2010	1,824	903
2011	1,329	782
1 st Quarter 2012	306	169

Source: Larimer County Public Trustee, Colorado Division of Housing

Table 19 on the next page illustrates average rent and vacancy rates from the Colorado Multi-Family Housing Vacancy and Rent Study conducted by Dr. Gordon E. von Stroh, Ron Throupe and Jennifer von Stroh, sponsored by the Colorado Division of Housing, Apartment Realty Advisors, and Pierce-Eislen. The average rent for Loveland in the second quarter of 2012 was \$876.62. This is down from the five-year high of \$1,045.62 in the 2nd quarter of 2011.

Vacancy rates have also dropped significantly from a high of 10.4% in the 2nd quarter of 2007 to a five-year low of 3.5% during the 2nd quarter of 2012. A vacancy rate of 5.0% is regarded as “stable”. A rate lower than 5.0% means competition for units is high and a rate greater than 5.0% may mean that landlords have to defer maintenance. A frequent comment during interviews for this report was that with such low vacancy rates, landlords can be selective in choosing tenants.

Table 19: Average Market Rent & Vacancy Rate: 2nd Qtr. 2007 – 4th Qtr. 2012

Year	Average Rent/Vacancy Rate		Average Rent/Vacancy Rate	
	2nd Quarter		4 th Quarter	
2007	\$841.44	10.4%	\$862.32	5.6%
2008	\$853.75	5.7%	\$850.92	6.1%
2009	\$870.63	7.0%	\$769.62	6.6%
2010	\$936.07	4.1%	\$910.31	3.6%
2011	\$1,045.62	5.2%	\$1,006.51	5.3%
2012	\$876.62	3.5%	Data not available	

Source: Colorado Multi-Family Housing Vacancy and Rent Study, 1st Quarter 2012; Colorado Statewide Multi-Family Vacancy and Rent Survey by market Area, 4th Quarter 2012 – by Dr. Gordon E. von Stroh – sponsored by Colorado Housing Finance Authority, Colorado Division of Housing, Apartment Realty Advisors, Pierce-Eislen

The Colorado Affordable Housing Vacancy and Rent Study for the 1st and 4th Quarters of 2012 is summarized below in Table 20. For the purposes of this study, affordable housing was defined as “units that are deed-restricted and require residents to have an income that is no higher than the respective Area Medium Income appropriate to the governmental funding requirements for that property”. The average affordable rent in Loveland was \$637.68 during the quarter of 2011 with a vacancy rate of 2.3%, the lowest in five years.

Table 20: Average Affordable Rent & Vacancy Rate: 1st Qtr. 2007 – 4th Qtr. 2011

Year	Average Rent/Vacancy Rate		Average Rent/Vacancy Rate	
	1 st Quarter		4 th Quarter	
2007	\$650.84	5.9%	\$661.13	10.6%
2008	\$642.89	3.4%	\$641.99	20.3%
2009	\$644.83	11.9%	\$740.97	8.4%
2010	\$629.20	3.2%	\$739.35	7.2%
2011	\$637.68	2.3%	-----	

Source: Colorado Multi-Family Housing Vacancy & Rent Study, 1st Quarter 2012; Colorado Affordable Housing Vacancy and Rent Study, 1st Quarter 2011– Dr. Gordon E. von Stroh – sponsored by CHFA, Colorado Division of Housing, Apartment Realty Advisors, Pierce-Eislen

There are about 1,200 affordable income-restricted apartments in Loveland that were developed using Low Income Housing Tax Credit (LIHTC) or Private Activity Bond funding. These units primarily serve households with incomes between 40.0% and 60.0% AMI. Nearly half of the affordable units in Loveland are for families and are owned by the Housing Authority of the City of Loveland. In contrast, there have been nearly 2,000 market rate apartment units built in Loveland between 2005 and 2011.

Mobile homes have been a source of affordable housing for some households. The 2010 Census showed that 2.0% of the housing units in Loveland were mobile homes. There are currently 11 mobile home communities in Loveland accommodating more than 1,100 units. No new mobile home communities have been planned in Loveland for several decades and some of the existing communities have undergone a redesign to move away from the traditional single-wide mobile home, to the more attractive and larger double-wide units. As a result,

communities have lost spaces. Another issue with mobile home communities is the conversion to some other form of development. While this has not yet been an issue in Loveland, several mobile home communities have been redeveloped for other uses in Fort Collins resulting in the displacement of over 300 families since 2000. For those who owned their mobile home, some were able to relocate to other mobile home communities that had space, while other homes were too old to meet community requirements, or to be moved, leaving their owners with few options.

In 1978, the use of lead-based paint was banned in the United States; much of the housing built prior to this time is thought to still contain lead-based paint. An estimated 11,255 housing units in Loveland were built prior to 1978. The highest levels of lead are typically found in homes built prior to 1940, which accounts for over 1,800 units. The older homes in Loveland are often in areas where households with low incomes live and lead-paint mitigation is quite expensive.

The 40th Percentile Fair Market Rents (FMR) for existing housing in the Fort Collins/Loveland MSA was released by the U. S. Department of Housing and Urban Development in October of 2011 (see Table 21 below). The FMRs are estimates of area rent, including utilities (and excluding telephone, cable or satellite TV, and internet service). FMRs are used to ensure that a sufficient supply of rental housing is available to Housing Choice Voucher (Section 8) participants. A subsidy is provided to cover the gap between the monthly FMR and 30.0% of the household's income. The 40th percentile level has been used by HUD for a number of years and means that 40 percent of the standard-quality rental housing units in the area have rents below this rate, while 60.0% have rents higher than this rate. FMRs should be high enough to provide a selection of housing units and neighborhoods for participants, yet low enough to serve as many low-income families as possible. Based on the average apartment market rate rents on the previous page, all but the four bedroom average market rate rents are below the corresponding 40th percentile FMR for the particular unit type. Adding In utility costs makes these apartments even less affordable for many households.

Table 21: 40th Percentile Fair Market Rent & Average Monthly Rent– FY 2012		
Unit Type	40th Percentile Fair Market Rent	Average Monthly rent
Efficiency	\$513.00	\$762.18
1-Bedroom	\$615.00	\$872.90
2-Bedroom	\$746.00	\$880.28
3-Bedroom	\$1,086.00	\$1,110.85
4-Bedroom	\$1,266.00	\$1,166.38
Source: U. S. Department of Housing and Urban Development; Colorado Multi-Family Housing Vacancy and Rent Study, First Quarter 2012; Colorado Affordable Housing Vacancy and Rent Study, First Quarter 2011– by Dr. Gordon E. von Stroh – sponsored by Colorado Housing Finance Authority, Colorado Division of Housing, Apartment Realty Advisors, Pierce-Eislen		

Table 22 on the next page illustrates the incidence of cost burden for renters in the Fort Collins-Loveland MSA, based on data from 2010. Housing costs above 30.0% of household income are

considered to be a cost burden, while costs above 50.0% are considered to be a severe cost burden. In the Loveland and Fort Collins area, nearly 50,000 households are cost-burdened, with nearly one-quarter of these households experiencing a severe cost burden.

Table 22: Cost Burdened Renter Households by Percent of Income Paid, Fort Collins-Loveland MSA - 2010

Rent-Burdened	Number of Households	Percentage of Households
30% or more of Income spent on housing	20,396	41.1%
35% or more of Income spent on housing	17,417	35.1%
50% or more of Income spent on housing	11,840	23.8%
TOTAL	49,653 Households	
Source: Colorado Department of Local Affairs, Division of Housing		

5. Transportation

Public transportation in Loveland is provided by COLT (City of Loveland Transit), which offers fixed route service on three routes between the hours of 6:38 AM and 6:37 PM Monday through Friday, and 8:48 AM to 5:37 PM on Saturday. During the public involvement process for the COLT Transit Plan Update in 2008/2009, the most frequently made comments by residents included the need to increase frequency of routes, increase hours in the evenings and on weekends, establish regional connections, access lower income housing areas, and provide more transit coverage throughout the community. Future plans are to extend evening service until 8:30 P.M on week nights and Saturdays for two routes, redesign routes to make them two-way, and add routes locally and regionally. These plans will be phased in over time. The FLEX (Fort Collins Longmont Loveland Express) bus route provides regional service from Fort Collins to Longmont, with stops in Loveland and Berthoud. In 2011, FLEX had 168,609 riders including Loveland riders who can use the city's fixed-routes to connect to FLEX. The FLEX route replaced the Foxtrot route, which provided service between Loveland and Fort Collins. COLT and FLEX buses are wheelchair accessible and have bicycle racks.

COLT had 130,244 riders in 2011, down from 143,375 riders in 2010. COLT staff noted that route changes were made which typically results in a drop in ridership for a period of time. The three routes offered by COLT cover much of the older, established areas of the community. Service is provided to housing locations, along main arteries, to major employment areas, shopping areas, and key service areas (hospitals, human service offices and agencies, and the senior center). The newest route covers the area of East Eisenhower Boulevard, to the

Centerra area, east of I-25.

The COLT Paratransit Service provides door-to-door, on demand service in Loveland on a reservation basis for persons who cannot use the fixed route service and who are certified under Americans with Disabilities Act (ADA) requirements. During 2011, Paratransit rides totaled 7,579, down from 8,203 rides in 2010. The drop in ridership for Paratransit is thought to be due to more passengers moving into care facilities that offer transportation and the loss of long-time passengers through death, or as a result of age and/or health issues. Paratransit operates Monday through Saturday during the same hours as COLT. Reservations can be made up to two weeks in advance. Map 2 in Appendix D shows current bus routes.

Persons interviewed for this report stated that transportation is a barrier for many households living on limited incomes. Area agencies offer gas vouchers or bus tokens to their clients, but demand exceeds the supply of both tokens and vouchers. The increased cost of gasoline has also made transportation a more significant issue for many households. In 2011, a total of 456 individuals received assistance with transportation needs through bus passes and gas vouchers.

SAINT or Senior Alternatives in Transportation provides transportation in Loveland for people 60 and over, and people with disabilities that cannot drive. SAINT uses volunteer drivers and their own cars to provide free rides. In 2011, SAINT drivers provided over 21,000 rides to seniors and persons with disabilities in Loveland and Fort Collins.

SECTION THREE

Current Fair Housing Legal Status

1. Fair Housing Complaints

Federal fair housing laws prohibit discrimination on the basis of race, color, religion, sex, national origin, mental or physical disability, or familial status in the sale or rental of housing, home mortgage lending, and purchase of homeowner's or renter's insurance. It is also against the law to refuse to make reasonable accommodations for persons with disabilities, or to harass, interfere or retaliate against anyone who exercises their fair housing rights. Colorado law adds marital status, creed, ancestry, and sexual orientation (including transgender status), to the federal protected classes for housing discrimination. HUD recently added sexual orientation (gay/lesbian/bi-sexual/transgender) and gender identity as a protected class for all housing that is McKinney-Vento funded (homeless housing assistance), as well as other housing that is assisted or insured by HUD.

In Colorado, housing discrimination complaints are filed with the U. S. Department of Housing and Urban Development's Office of Fair Housing and Equal Opportunity (FHEO) or the Colorado Civil Rights Division (CCRD) in Denver. These two agencies coordinate fair housing activities to avoid duplication of effort when there is joint-jurisdiction on a case. The CCRD fields an average of about 800 calls of discrimination annually, with about 1.0% of these related to housing. Most CCRD cases are related to employment issues.

Between FY 2007 and FY 2011, there were 15 housing complaints filed by residents of Loveland. Table 23 below summarizes the issues and status of these complaints. Of the 15 complaints, seven were based on mental disability and six on physical disability. The other two were related to familial status and national origin (Hispanic/Latino). All but the most recent complaints have been closed. Of the closed cases, 14 had no cause determinations and one person who filed a complaint did not cooperate with HUD.

Table 23: Fair Housing Complaints: FY 2007 – FY 2011

Year	Number	Issues*	Status
FY 2007	2	1 mental disability; 1 Hispanic origin	closed: 1 no cause; 1 complainant did not cooperate
FY 2008	2	1 familial status; 1 mental disability	closed: 2 no cause
FY 2009	6	6 physical disability	closed: 6 no cause
FY 2010	3	3 mental disability	closed: 3 no cause
FY 2011	2	2 mental disability	still open - no cause
TOTAL	15	1 familial status; 1 Hispanic origin; 7 mental disability; 6 physical disability	13 closed, 2 open (14 no cause); 1 no cooperation by complainant)

Source: Office of Fair Housing, U. S. Department of Housing and Urban Development

*Note: there is often more than one issue given on complaints, which means that the issue column may exceed the number of complaints actually received. Federal Fiscal Year (FY) is October 1 – September 30

The Larimer County Office of Colorado Legal Services (CLS) provides legal assistance to low-income persons and families in the areas of family and children, housing, consumer issues, elder law, health law, and government benefits. Between July 1, 2011 and June 30, 2012, CLS handled 248 cases from Loveland residents. Of these, 29 were related to housing, and either eviction, Section 8 housing, or accommodations for disabilities. In some cases, CLS staff may work directly with local landlords to resolve issues, while in other cases clients are directed toward HUD or the Colorado Civil Rights Division if housing discrimination is involved.

CLS conducted a legal needs focus group in Loveland in 2009 through the House of Neighborly Service. The conclusions from this focus group were that “affordable housing and jobs that pay well are a necessity and that employment, affordable housing, and availability/access to health care services are critical, interrelated issues” in Loveland.

HUD’s Annual Report on Fair Housing for FY 2010 noted that there were 41,103 housing discrimination complaints reported to HUD nationwide between FY 2007 and FY 2010. The majority of complaints filed with HUD were based on disability (50.0%), followed by race (33.1%). In past years, the number of complaints filed on the basis of disability and race were fairly even, but disability has since become the most common factor in housing discrimination complaints over the past five years.

The results of the questionnaires completed by clients of local agencies revealed that people believe they have been denied housing in Loveland based on race/color, national origin, gender, family size or type, disability, and religion, although only one person filed a housing discrimination complaint out of the 74 that indicated that they had been denied housing for at least one of the reasons listed on the questionnaire. The reasons why the other 73 did not file a complaint included not believing that he or she had a complaint; the respondent did not know how to file a complaint or didn’t want to take the time to file; and other reasons, including language. This information indicates that there may be housing discrimination occurring and that many people may not understand discrimination or how to file a complaint. It may also be the case that area landlords are unclear as to what constitutes housing discrimination, particularly in the area of reasonable accommodations.

In addition to the formal housing discrimination complaints filed, several residents have contacted the City’s Community Partnership Office or local housing agencies to express concerns about potential housing discrimination or housing issues. A wheelchair-bound Loveland resident contacted City staff in July of 2011 because she could not find an accessible housing unit. After renting the same accessible house for 35 years, the property went into foreclosure. An eight month search resulted in her renting a non-accessible house. A resident of one of the Housing Authority properties contacted City staff in 2009, believing that he was

discriminated against and harassed over a parking issue at his apartment complex. Another resident in Loveland felt she was being discriminated against by the manager of her rental unit because of her race and familial status. Neighbor to Neighbor staff found her another apartment and the resident was going to file a complaint. If this complaint was filed, it was not included in the data above, since this data does not include FY 2012. These are examples of the kinds of housing issues that, while they may not all be discriminatory in nature, create housing situations for residents that are difficult for them to address.

There are no known fair housing discrimination suits pending or filed by the U. S. Department of Justice, or by private plaintiffs in Loveland, nor are there any known compliance review findings. While the housing discrimination complaints filed were found to have no cause determination, housing discrimination, particularly on the basis of mental and physical disability, is occurring in Loveland and is an impediment to fair housing choice. Many of the questionnaires that were received as part of this report contain the names and phone numbers of the respondents. The Community Partnership Office will follow-up with each of these community members, starting with the ones that indicated that they were denied housing in Loveland. If necessary, and within the one year statute of limitations, assistance will be given to file a formal complaint.

2. 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 serve to restrict housing choice or the availability of housing choice. This section of the report addresses housing problems related to discriminatory and illegal practices, as well as general and specific local housing concerns that may occur. The inclusion of these practices in this report is not intended to imply that these practices are occurring, but to provide an overview of the variety of ways in which housing discrimination may happen and which are illegal under the provisions of the Federal Fair Housing Act.

A. 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 real estate agent or broker is a member of a minority population, or has disabilities, and 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 an equivalent unit, 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. Discriminatory practices may be difficult to identify and prove. The only evidence found that any of these practices are occurring in Loveland is based on the housing discrimination complaint data in this section and in the results of the questionnaire collected for this report.

B. General Housing Concerns

Local Preferences

Using a point system, the Housing Authority of the City of Loveland gives first priority or preference for the Housing Choice Voucher program (Section 8) to persons who are homeless, and second, to people who are employed in Loveland. The Housing Authority administers 548 Section 8 vouchers with 86 designated for persons with disabilities. One-hundred of the vouchers are project-based, with 50 at Creekside Gardens and 50 at Maple Terrace Apartments. The project-based vouchers must be used at these specific locations, while Housing Choice Vouchers are portable, moving with the household. The Housing Authority's waiting list has approximately 2,500 households waiting for some type of housing assistance. At one time, the waiting list was nearly 4,500 households. At this point, it can take up to two years on the waiting list to receive housing, depending on the number of bedrooms requested and the priorities the household meets. The Housing Authority currently has nearly 600 units of housing on 12 properties it owns and operates in Loveland, including one single-family home. Homeless women who are pregnant and homeless, or victims of domestic violence, are priorities for other area agencies including Interfaith Hospitality Network and Alternatives to Violence. Disabled Resource Services prioritizes homeless persons that have disabilities and

have children.

Housing Disproportionality

According to 24 CFR 91.305, a disproportionate burden may exist when the percentage of persons in a particular population group is at least ten percentage points higher than the percentage of persons in that same population as an overall group. Table 24 below summarizes the rates at which persons of racial groups, Hispanic/Latino origin, persons with disabilities, and single-parent families are Housing Authority residents as compared to the proportion of these same groups city-wide who are living in poverty. City residents living in poverty is the closest measure to use to compare with the income levels of Housing Authority residents. This analysis shows that persons with disabilities make up a disproportionately large group of Housing Authority residents, as do single-female parent families. Conversely, Native Americans are completely unrepresented as Housing Authority residents.

Table 24: Housing Authority Residents by Race, Hispanic/Latino Origin, Disability & Single-Parent Families		
Race	Housing Authority Residents	City-Wide Residents Living in Poverty
African American/Black	2%	1%
Asian	1%	1%
Native American	0%	4%
Pacific Islander	0%	0%
White	97%	94%
Hispanic/Latino Origin	15%	16%
Non-Hispanic/Latino Origin	85%	85%
Disabled	38%	19%
Single-Female Parent	79%	50%
Single-Male Parent	21%	17%
Source: Housing Authority of City of Loveland Tenant Statistics, 2012; American Community Survey, 2010		

Expiring Housing Assistance Contracts

The HUD Housing Assistance Contracts in Loveland were originally granted to offset 40-year mortgages. Under the contracts, tenants paid 30% of their adjusted gross income for rent; the difference between the tenant's ability to pay and the total operating cost of the rental property was covered by an operating subsidy contract under the Project-Based Section 8 Voucher program. In Loveland, Creekside Gardens and Maple Terrace had the last expiring contracts. Both remain as affordable housing developments, with Creekside Gardens owned by the Housing Authority's Housing Development Corporation and Maple Terrace by the Housing Authority of the City of Loveland.

Displacement

There have not been any publicly-assisted housing units lost to demolition or gentrification in the past five years, nor has there been any displacement as a result of the closure of any mobile home parks. Neighbor to Neighbor, a 501(c)3 corporation, sold several rental units in Loveland, but these units have remained as affordable units under the new (for-profit) ownership.

The City's Anti-Displacement and Relocation Assistance Plan calls for avoiding any activity that results in displacing an individual or business. Activities that would result in displacement of individuals from their homes will not be funded unless the City Council determines that the activity's benefit to the community "substantially outweighs the hardship, expense and inconvenience placed on the residents, business and/or city government". If an activity that is funded with federal money results in displacement through demolition, the City will require that all occupied or vacant low and moderate-income housing units be replaced within three years of the beginning of the demolition or conversion of the living units, and that relocation assistance funding be provided as required under the Uniform Relocation Act and Section 104(d) of the Housing and Community Development Act.

C. Specific Housing Concerns

Housing Needs for Persons with Disabilities

The 2010 Census shows that 7,098 Loveland residents have a disability. This figure is lower than that of the 2000 Census, which identified 14.3% of the population, or 7,258 residents over the age of five as having a disability. As noted in Section Two, this lower figure may be due to the use of estimates in the American Community Survey since 2005.

An analysis of Housing Authority residents, compared to the city-wide population of people living in poverty, shows that persons with disabilities make up a disproportionate share of the Housing Authority residents and could benefit from increased affordable or assisted housing opportunities. This information is detailed in Table 24 on the previous page.

There are 345 households with a disabled person living in the household (or 15.4% of all households) on the Housing Authority's waiting list. The total number of individuals who are disabled and on the waiting list is 362, or 8.0% of all individuals. Disabled Resource Services also keeps a waiting list that has about 135 households waiting for housing assistance, although these families are likely a duplication of the Housing Authority's list. Of the Housing Authority's nearly 600 units, about one-third are accessible, and most are found at Silver Leaf I and II and at Mirasol, which are all senior housing developments. The Authority has a Request for Reasonable Accommodation Policy for residents/applicants who want to request an accommodation. Written requests are reviewed by the Housing Authority's Section 504 Coordinator and must include documentation from a healthcare provider, or in the case of a service animal, from the animal's veterinarian. This policy includes a grievance hearing if the request is denied. If a resident has a 504 Plan and a non-disabled person or family is living in an accessible unit, the Housing Authority is required to move the non-disabled person or family out of the accessible unit.

As the general population ages, there is expected to be an increased need for housing units for people who experience reduced mobility as well as other disabilities, such as hearing

impairment, work-related, developmental disabilities, chronic mental illness, and visual impairment. The City's 2010 – 2015 Consolidated Plan estimated that more than 4,000 Loveland households have persons with disabilities living in them. Many are living in housing that does not accommodate their disability, such as units that lack roll-in showers or doorways that are not wide enough for a wheel chair.

Persons with disabilities may have difficulty finding housing that is both accessible and affordable. The majority of accessible housing units are found in newer housing developments, where they were required by Building Code. These units tend to be more expensive than existing housing units because they are newer and may have amenities not found in older developments. Older housing units may need adaptations in order to become accessible, and in some cases, these changes may be costly to make.

Area agencies and organizations that work with people that have a physical or developmental disability also report an increase in the demand for accessible housing units that are affordable. **Disabled Resource Services (DRS)** is one of ten centers for independent living in Colorado and has been serving persons with disabilities for over 30 years in Loveland and Fort Collins. Services for clients consist of case management, which includes financial assistance, independent living skills training, peer counseling, advocacy, employment assistance; and the Community Awareness and Response program, which includes information and referrals, volunteer coordination, an equipment rental closet, and public education and awareness. While DRS does not provide housing, they have 86 vouchers that are administered by the Housing Authority of the City of Loveland and there is a waiting list of about 135 households for these vouchers. DRS also offers referrals to help clients find housing and maintains a listing of accessible housing units. Nearly 7,000 clients are served annually by DRS; 30.0% of which are Loveland residents. In 2011, the Loveland DRS staff spent an estimated one-third of its time dealing with housing issues for clients.

The two most difficult accessibility issues for residents to overcome are the interior accessibility of housing units that have not specifically been built for someone with a disability and finding accessible housing that is also affordable. Adults with disabilities typically receive monthly Supplemental Security Income (SSI) payments of \$698 per month, which may not cover housing costs. Estimates from the 2008 – 2010 American Community Survey are that about 13.0% of Loveland's disabled population is living below poverty. Another issue related to accessibility is the location of the unit in the development, as well as its proximity to building entrances, safety, and parking and transportation options if the individual does not have his or her own transportation.

Foothills Gateway, Inc. serves persons in Larimer County with cognitive disabilities. Created in 1972, Foothills Gateway served approximately 1,700 individuals and their families in 2011. Services include resource coordination and case management, supported living services, employment and work services, transportation, and adult care. Because of the high demand

for its services and recent budget cuts, Foothills Gateway maintains a waiting list for many of its programs. The waiting list for 2011 was 362 persons, with only 69 new clients receiving services that year.

WINGS supports adults in Loveland with developmental disabilities and offers a day program to promote independence, interdependence, self-advocacy, healthy life styles and inclusion. The waiting list for services at the state level may be as long as five years, so WINGS offers a private pay option for those who can afford to pay. In 2011, WINGS provided services to approximately 40 adults in Loveland.

Ensign Skills Center assists people who are visually impaired, ranging from those who have low vision, to those who are legally blind. Annually, between 850 and 1,000 clients are served. Ensign staff believe that persons with low vision are both under-served and under-counted locally. Estimates by Ensign are that about 56,000 people in Larimer County suffer from low vision.

Housing Needs for Single Heads of Household with Children

The number of single-parent households in Loveland has been increasing, with the number of female heads of household up by 48.7% and male-headed households up by 54.9% in 2010. Single-parent households have the added difficulty of finding housing that is affordable on one income. The Housing Authority's waiting list has 1,700 female-headed households (or 76.0% of all households) and 536 male-headed households seeking housing assistance; there are also 1,662 children on the waiting list. The City's Consolidated Plan states that 77 families totaling 201 individuals were living in emergency shelters and transitional housing units, while 50 families totaling 130 individuals were unsheltered in 2010. It is unknown if these families are waiting for housing through the Housing Authority.

An analysis of Housing Authority residents compared to the city-wide population living in poverty showed that single-female parent families make up a disproportionate share of the Housing Authority residents and could benefit from increased affordable or assisted housing opportunities. This information is detailed in Table 24 on Page 31.

Project Self-Sufficiency (PSS) began in 1986 as a program of the Housing Authority of the City of Loveland and offers assistance to single-parent families working to become financially independent. Housing is available at the Willow Place Apartments in Loveland, which can house 20 families. There are an additional 40 families participating in the Loveland program and 77 families in Fort Collins, six of which also live in PSS subsidized housing.

There is often a waiting list for the PSS program, with approximately eight families currently on the list in Loveland. In addition to case management, assistance is given to program participants in the areas of education and career support, general support and advocacy, practical assistance with car repair or receiving a donated car, emergency assistance, child care,

mental health therapy, computer and household donations, and children's programs, including back-to-school clothing, access to gymnastics and music lessons, and tutoring. The staff of Project Self-Sufficiency is seeing a higher number of homeless clients than in past years and families are moving to the area with the expectation of receiving assistance because the area has a good reputation for providing these services.

As housing costs have risen, low and moderate-income families and households have experienced more limited housing choices. Families with children have even fewer choices for units that are affordable and large enough to accommodate a large number of children, as the majority of apartments in Loveland are one-and two-bedroom units. There are some three and four-bedroom units, although the larger housing units tend to be found in older single-family detached homes. Housing in single-family homes may not be affordable for low or moderate-income families and/or the housing may be sub-standard due to the age of the home and the need for repairs. Based on 2010 Census data, there are 213 housing units that lack complete kitchen facilities and 49 that lack complete plumbing. Map 3 in Appendix E of this report shows the locations of multi-family developments owned by the Housing Authority.

The 2010 Census also noted that about 150 units in Loveland were overcrowded; smaller units are especially prone to overcrowding. Additional affordable housing is needed, especially for residents living between 31 to 50% of AMI with several children. The City's Consolidated Plan identified the largest gap in rental housing for households earning 31 to 50% of AMI with an estimated deficit of 2,100 units. A gap of 1,035 units exists for households that earn up to 30% of AMI, and a gap of 473 units exists for households earning between 51.0% and 60.0%. There is also a lack of ownership housing, with an estimated deficit of 2,409 homes for households earning up to 30% of AMI, and 1,545 for households that earn 31 to 50% of AMI. The total gap in housing units in Loveland is estimated to be approximately 6,500 ownership units and 5,800 rental units.

Another issue for single parents is referred to as the "cliff effect". This phenomenon occurs when a pay increase results in the wage earner becoming ineligible for child care or other benefits. Staff of Project Self-Sufficiency noted that a single mother client of PSS was offered a \$.30 per hour increase that would make her ineligible for housing, food stamps, and child care assistance. In this instance, a single parent is faced with the decision of passing up a raise so that these key benefits are not lost.

Housing for the Homeless

A homeless count was completed in Loveland between November 1, 2011 and March 31, 2012 for people considered to be Loveland residents. This count was unduplicated and revealed a total of 685 people who are literally homeless and another 516 at imminent risk of homelessness. The data from this count are summarized in Table 25 below. A poster has been made using this information (see Appendix F) and will be used at future events related to housing and homelessness to raise awareness in the community. Staff of agencies that assist

the local homeless population noted that many Loveland residents believe the homeless population is a transient population, while others don't believe there is a homeless population, since many of those who are homeless are not visible in the community. During the winter of 2011/2012, the transient population at the 137 Homeless Connection inclement weather and day shelter was 10.0% or less of the total population.

Table 25: Homeless Population: November 1, 2011 – March 31, 2012

Agency	Number of Homeless Served & Agency Type
137 Homeless Connect	131 Adults
Interfaith Hospitality Network	30 adults and 31 children (7 school age children)
Catholic Charities of Northern Colorado	9 adults and 1 child
Thompson School District	366 children*
Alternatives to Violence	21 adults and 26 children (all children are school age)
Crossroads Safehouse	15 adults and 8 children
House of Neighborly Service	64 adults and 61 children (45 school age children); 84 adults at risk of homelessness
Housing Authority of City of Loveland	432 adults at risk of homelessness
Total	685 Homeless. 516 at risk of homelessness.
Source: Participating Agencies	*All school age children were included in this total

The staff of the Community Partnership Office participates in the Loveland Homeless Task Force, which is a networking group of Loveland non-profits, the faith community, and concerned citizens that meets monthly to discuss the needs of the local homeless population. An estimate provided by the House of Neighborly Service is that it costs about \$40,000 per year to provide emergency services for one homeless person. According to the National Coalition for the Homeless, the primary causes of homelessness are the result of a shortage of affordable housing and an increase in the number of people living in poverty. The City's 2010 – 2015 Consolidated Plan identified a gap or unmet need for emergency shelter beds, transitional housing, and permanent supportive housing for 280 unsheltered persons. Based on the homeless count numbers completed in March, the unmet need may be significantly higher.

The HUD definition of homelessness, and documentation required to prove this status, changed in 2009 with the authorization of the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act), which affects grant funding beginning with FY 2011 programs. This new definition includes four broad categories of homelessness, as follows:

1. Individuals and families that lack a fixed, regular, and adequate nighttime residence, including a subset for individuals residing in an emergency shelter or a place not meant or human habitation or exiting an institution where he or she temporarily resided;
2. individuals and families who are losing their housing in 14 days and lack support networks or resources to obtain housing;
3. unaccompanied youth, and families with children and youth, who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition;
4. people who have moved from place to place and are likely to continue to do so because

- of a disability or other barriers; and
5. individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member.

Meeting one of these definitions is necessary to qualify for HUD-funded homeless assistance and is intended to provide a more consistent method of defining homelessness. The impact of these new definitions is currently unknown on a local level.

Agencies and organizations currently offering services to the Loveland homeless population include the following:

The first cold weather day shelter in Loveland opened in 2007, in the City-owned Pulliam Building. The day shelter now resides at a permanent location at 137 South Lincoln Avenue under the name **137 Homeless Connection**, operated by the **House of Neighborly Service**. During the winter of 2011/2012, this facility provided day shelter for 155 homeless adults. Twelve area churches provided night shelter on a rotating basis through the Inclement Weather Night Shelter program.

The **Hostel of Hospitality at the Mission**, operated by Catholic Charities of Larimer County, can shelter up to 40 persons, including singles and families. Breakfast and evening meals are provided during the week, with breakfast and noontime meals on weekends. Other services provided by Catholic Charities of Larimer County include job placement through the Hope Job Bank; emergency assistance for food, personal care items, transportation, utility bills, and prescriptions; case management services; respite care for caregivers through the Caring Hearts Program; and food packages. During the winter of 2011/2012, the Mission sheltered 9 adults and one child from Loveland.

Alternatives to Violence (ATV) has been providing emergency services, counseling and transitional housing for victims of domestic violence in Loveland for over 30 years. ATV served 775 people in 2011, a 36.0% increase over 2010, and has seen a 24.0% increase in demand for services in so far this year. Along with housing for about nine families, intensive counseling and job and/or educational assistance are provided. Participation in the housing program can last for two years for families with children. Single women who are victims of domestic violence have a difficult time finding shelter and housing in Larimer County and ATV is the only domestic violence service provider in Loveland. Construction of an eight-bedroom safehouse is planned and funding is being raised to provide shelter to the increasing number of domestic violence survivors. Crossroads Safehouse, in Fort Collins, serves over 1,200 Larimer County residents annually at its shelter and outreach center. During the winter of 2011/2012, ATV sheltered 21 homeless adults and 26 children and Crossroads sheltered 15 adults and 8 children from Loveland.

Interfaith Hospitality Network (IHN) (also known as the Angel House) works with 12 area

churches that are members of the Interfaith Hospitality Network, providing shelter for homeless families. Shelter and meals are provided at the churches on a weekly, rotating basis, and case management and mentoring for homeless families with children is provided at the day center during the day. In 2011, a total of 18 families (55 individuals) were sheltered and eight families are on the waiting list for shelter through IHN. IHN also provides transitional housing in five housing units; families can live in the transitional units for up to two years. There are generally at least three families on the waiting list for a transitional unit each year. Clients being served are younger, and if pregnant and/or in crisis are a priority for receiving shelter.

The **Matthews House** works with young adults and families in transition to coach and mentor them to self-sufficiency, specifically targeting youth aging out of the foster system. The agency focuses on five areas to help the youth and families learn the skills they need to live independently, including safe/affordable housing, physical and mental health, employment, education, and independent living/social skills. Eight host homes are available for referral for those 18 and older, with stays ranging from one week to six months. Family Unification Vouchers are available through the Larimer County Department of Human Services, which provides housing assistance for 50 households, of which 25 are reserved for homeless youth between the ages of 16 and 21. About 100 youth are served annually by The Matthews House and about 25.0% are from Loveland. The House of Neighborly Service, along with The Matthews House, is planning a community life center in Loveland to provide services under the “settlement house” concept, where all services will be provided in one location.

The **Sister Mary Alice Murphy Center for Hope** opened in 2009, in Fort Collins for Larimer County residents and is serving an average of 125 persons each day the center is open. The homeless and near homeless can receive on-site counseling and referrals for housing, mental health, and other supportive services. The center involves a collaboration among a number of area human service agencies and organizations including United Way, Catholic Charities, the cities of Loveland and Fort Collins, CARE Housing, the Fort Collins Housing Authority, and Larimer County, as well as other human service agencies and faith-based organizations. The Sister Mary Alice Murphy Center provides resources and access to shelter, but does not provide shelter. Unfortunately, the distance from Loveland makes the Center accessible only for families or individuals living in Loveland that have transportation.

While transitional housing is not part of the definition of homelessness under the HEARTH Act, there are local resources available to assist the homeless toward transition into permanent housing. The staff of the City’s Community Partnership Office is a member of the **Northern Front Range Continuum of Care**, which was formed in 1998 by area housing agencies and organizations. This group’s goal is to assist homeless families, and families at-risk of becoming homeless, toward stable housing and self-sufficiency through transitional housing and supportive services. Because the local focus for transitional housing has been on families, there are no single-room occupancy units for homeless single adults and several agency representatives noted a need for these units.

Before homeless individuals are discharged from a publicly-funded institution or system such as the justice system (incarceration due to criminal activity), mental health institution, child welfare system (foster care), public health system (hospitals or rehabilitation centers), and the housing system (shelter care, Section 8 housing, or transitional housing), case managers try to assist them in finding housing; however, there are few options available in Loveland. If the individual has a family that is also homeless, they may be able to find temporary shelter through the **Interfaith Hospitality Network**. If he or she is a victim of domestic violence, shelter space in Loveland or Fort Collins is limited and transitional housing is both time-limited and with a long waiting list.

Larimer County Detention Center staff provide resource information to inmates before they are released, and coordinate any needed mental health care and work to place mentally ill persons in housing or treatment centers. The last resort for housing for some may be the Catholic Charities Mission in Fort Collins and being placed on waiting lists for housing assistance with area housing agencies, although if someone has a criminal background it is an even more difficult barrier to overcome, particularly in cases of sexual predators that have limitations on where they can reside.

Larimer County Community Corrections has a facility in Fort Collins that can house over 320 clients who are either transitioning out of prison or sentenced to Community Corrections. Residential programs operated by Community Corrections include the Women's Program (48 beds serving over 100 women each year), the 90-day Women in Recovery Program (residential substance abuse), and Short Term Intensive Residential Remedial Treatment Program for men with drug or alcohol dependence. For those living in or being released from health care or mental health facilities, assistance with medical needs is available through a number of area prescription assistance resources. The Colorado Indigent Care Program (CICP) is available for those who qualify for services. There are other sources of housing that typically require the resident to pay, including The Lighthouse, Oxford House, and Hearth Stone. Some of these programs are only for single men and, in addition to housing, provide counseling for addiction and other issues that clients may have.

Housing Needs for Minority Populations

The minority population in Loveland increased by 76.6% between 2000 and 2010, from 5,755 to 10,163 residents, and the Hispanic/Latino population in Loveland accounted for 11.7% by 2010, an increase of 3.1% from 2000. Of the households on the Housing Authority's waiting list, 92.4% are White or Caucasian and 13.7% are of Hispanic/ Latino origin. African Americans make up 3.8% and Native Americans/Pacific Islanders 2.8% of households on the waiting list. Asians and mixed race/other races each made up less than 1.0% of households.

Minority households make up 2.4% of Housing Authority residents, with the majority being African American/Black households, while Native American/Pacific Islanders and Asians

combined make up about 1.0% each. Hispanic/Latino households account for 15.0% of households living in Housing Authority units.

Housing for the Mentally Ill

The Larimer County 2010 Health District Survey found that over 51,000 people in Larimer County received mental health services in 2010, and another 22,000 residents needed mental health services that year but did not receive them. The need for mental health services has more than doubled since 2001, when 21,000 Larimer County residents received services.

The number of suicides in Larimer County in 2011 was 62, which is the highest number ever. As of May of 2012 with 20 suicides, 2012 is on pace to reach that number again. The City's Consolidated Plan estimated that 250 Loveland residents who are severely mentally ill have unmet needs. There is an ever expanding need for supportive housing in this area.

Touchstone Health Partners (formerly the Larimer Center for Mental Health) served over 6,600 clients in Larimer County in 2011, with over 900 patients cared for through a partnership between Touchstone and the Loveland Community Health Center. Nearly 2,000 Loveland residents received referrals and therapy by Loveland Counseling Connections, which serves low and moderate-income persons in need of mental health counseling on a sliding-scale or pro-bono basis. About 85.0% of Touchstone's clients are from households with annual incomes under \$25,000. Touchstone has a seven-unit apartment building in Loveland (4th Street Apartments) that provides housing for mentally ill individuals who were homeless and are capable of living independently. There is a wait time of two years or more for this assisted housing.

The **Alternatives to Incarceration for Individuals with Mental Health Needs (AIIM)** program was established as a collaboration between Larimer County Community Corrections, Larimer Center for Mental Health (now known as Touchstone Health Partners), the Larimer County Sheriff's office and the Probation Department as an alternative to incarceration to repeat offenders who also have mental health issues related to their crimes. This program's goal is to reduce jail days and probation services by giving clients supervision and intensive case management. Participants receive treatment and assistance with housing, basic needs, and employment. This program is available for those living in Larimer County. There is also a Community Dual Disorder Treatment program (CDDT) that provides intensive mental health and substance abuse counseling, as well as housing/residential services, medical services, and supported employment.

Housing for Persons Living with HIV/AIDS

The Colorado Department of Public Health and Environment reported that between 2007 and 2011, there were 45 new cases of HIV in Larimer County. In Colorado, during this same time period, there were 300 new reported HIV cases. Persons living with HIV/AIDS are living longer, healthier lives, due to the medical treatments that are available. Estimates given at the

International AIDS Conference in July of 2012 are that by 2020, half of the 1.2 million people living with HIV in the United States will be over the age of 50. The chronic diseases that come with age are now appearing in HIV patients who have a higher risk for some of these diseases due to the medications taken to treat HIV/AIDS and compromised immune systems.

As with any other special needs populations, access to housing decreases with lower levels of income and resources. HIV/AIDS patients receive assistance from the Colorado AIDS Project (CAP). The **Northern Colorado Aids Project (NCAP)** has provided services to persons infected and affected by HIV/AIDS in the northern Front Range and northeastern plains since 1986. Services provided for 51 clients in Loveland include case management to assist in filling out forms, arranging transportation, emergency rent and utility assistance, finding housing and medical care, prevention, and social support. There are five Loveland residents receiving housing assistance through the HOPWA program (Housing Opportunities for Persons with AIDS). Additional funding expected by July 2012 will allow additional clients to receive housing assistance based on income and a diagnosis of HIV. A waiting list will be opened for this additional funding. Persons with HIV/AIDS face the stigma of their illness and as a result, may choose not to reveal their condition to their landlord. Right to privacy laws protect medical conditions as a personal matter, so residents are not required to disclose.

Other Programs

There are other programs in Loveland that serve the needs of persons who are protected from housing-related discrimination under the Fair Housing Act. These programs include utility bill assistance, property tax assistance, financial counseling, and information referrals. Most programs have received assistance from the City of Loveland.

Neighbor to Neighbor (N2N) has been serving Loveland and Fort Collins since 1970, and has 14 units of affordable rental housing in Loveland, 11 of which are for seniors at the Willows Senior Housing on East 4th Street, and three are located at the Triplex Apartments on West 8th Street. In addition to providing housing, N2N offers HUD-certified housing counseling in English and Spanish, and a Home Buyer Education Program. Housing counseling includes emergency rent assistance (up to \$300 per household), first month's rent assistance, foreclosure prevention counseling, homeless and rental counseling, and reverse mortgage counseling. In 2011, N2N provided Loveland residents with 90 renter housing counseling sessions, 169 households received emergency rent assistance, and 95 households received first month's rent assistance. The Home Ownership Program counseled 65 households on foreclosure prevention, three households received pre-purchase counseling, and 12 households were counseled on reverse mortgages.

The **House of Neighborly Service (HNS)** has been helping individuals in Loveland become self-sustaining since 1961. Services include food baskets; prescription, medical, and utility financial assistance; clothing; transportation (bus passes, gas and repair vouchers); emergency shelter at local motels; and "step-up housing". The step-up housing program is a collaborative effort with

Neighbor to Neighbor for the first month's rent and damage-deposit guarantee. HNS provides office space to Neighbor to Neighbor and the Center for Adult Learning, which offers clients a "one stop shop" for many services in Loveland. In 2011, HNS provided over 43,448 services to 20,350 individuals. Through the Help a Neighbor in Distress, or HAND program, 781 households received assistance with City utility costs and 2,294 days of shelter were provided for 672 individuals (including the 155 individuals sheltered at the inclement weather shelter). Because of HNS's long period of operation in Loveland, many current clients are now third generation.

The **Larimer County Low-Income Energy Assistance Program (LEAP)** provides assistance for low-income households for a portion of winter home heating costs. The LEAP season is between November 1st and April 30th FYE (Fiscal Year Ending for the program). During FYE 2011, there were 6,657 LEAP applicants approved and 1,150 applications were denied. This is the largest number of applications submitted for LEAP and represents an 85.4% increase in the number of applications in the past. The average amount given per household in FYE 2011 was \$331.93, with the lowest amount at \$200 and the highest at \$1,000. To be eligible, households must pay directly to a utility company or have their heating costs included in their rent, be permanent legal residents of the United States and Colorado, and meet income guidelines.

GreenPath Debt Solutions (formerly Consumer Credit Counseling) offers foreclosure prevention and financial counseling, debt management, and training on money management for families in Northern Colorado and Southeast Wyoming. In the past year, GreenPath provided counseling assistance to 375 Loveland households on debt and budgeting, mortgage concerns, and bankruptcy; nearly 75.0% of those counseled in Loveland were on mortgage and bankruptcy issues. As mentioned by others interviewed for this study, GreenPath staff sees a coming trend of student debt as the next major credit issue for its clients and also noted that fewer clients had concerns in the past year over credit card debt. The recession may be the primary reason, since it led many to stop or cut back on credit card use.

The **Food Bank for Larimer County** provided food for 9,858 Loveland residents through its Food Share Program during FY 2011-12 in Loveland. The new Food Share Pantry opened in 2011 in an existing building in Loveland and serves an average of 250 people daily. The **Community Kitchen** provided lunch seven days a week, with over 22,000 lunches served annually.

2-1-1 began in 1996 and is a program of United Way of Larimer County serving Region 3, which includes Larimer, Routt, Moffat, Rio Blanco, Grand, and Jackson Counties, assisting residents 24 hours a day, 7 days a week, and the rest of Colorado during non-normal business hours, weekends and holidays. The program provides community resource information and referrals on a variety of topics. Between July of 2011 and June of 2012, 21,039 calls were received from Region 3, of which 7,183 were from Loveland. The top five *unmet* needs at the end of June 2012 were rent/utility assistance (43.4%); transportation (21.5%); individual, family and community support (7.8%); disaster services (4.4%); and income assistance (4.3%). 2-1-1 was essential during the High Park and Waldo Canyon fires of 2012.

Funding Partners for Housing Solutions, Inc. is a non-profit Community Development Financial Institution that provides access to lending in underserved markets throughout Colorado. Most Funding Partners recipients earn 80.0% of AMI or less. The Down Payment Assistance Program is available for homebuyers in Loveland through First Bank, which can provide up to 5.0% of the purchase price with a \$1,000 investment from the client. Through 2011, Funding Partners has helped create or preserve 2,785 housing units and has originated 88 project-based loans totaling over \$25M. The organization is able to fill a gap in funding after the developer has exhausted other resources.

Loveland Homeless Connect. On November 2, 2012 the Loveland Homeless Connect event was held for community members who are homeless or in danger of becoming homeless. The event is based on the national best practice model called Project Homeless Connect that has been replicated in over 260 communities across the nation. Those who attended were able to receive a variety of free services, including counseling, housing information, education information, a dental exam, a haircut, mammogram, and gear for the winter, such as a coat and a tent. The event provides a rare opportunity for volunteers to interact with community members who are homeless or are facing homelessness. Each client is paired with a community volunteer; this interaction of support and understanding provides a powerful connection between vulnerable individuals and volunteers. The Loveland Homeless Connect event will be used to further leverage a community conversation about homelessness in Loveland.

SECTION FOUR

Assessment of Fair Housing Activities and Programs

1. Public Policy: Planning, Zoning and Development

A. Comprehensive Plan and Land Use Plan

The City of Loveland adopted its Comprehensive Master Plan in 2005 and Land Use Plan in 2007. The Land Use Plan includes residential goals of encouraging a wide range of housing types for all ages and socio-economic groups; creation of a Housing Plan; increasing the availability of affordable rental and for-sale housing, particularly for lower income households; and encouraging rehabilitation and maintenance of the existing housing stock. Mixed-use developments with residential are encouraged, as is clustering residential density. One developer noted that housing location (close and convenient to schools, services, recreation, and employment) is becoming the new amenity, and a trend that developers are becoming more interested in is building “community” rather than simply building homes.

The Housing Plan includes assessing regulatory barriers to housing, current and potential incentives for affordable housing, addressing a jobs-housing balance, and evaluating the City’s Capital Expansion Fees (CEFs) to determine some level of equity related to housing unit size. In 2011, the City’s Comprehensive Master Implementation Plan was adopted to identify the goals and objectives of the Master Plan, as well as the City department and/or Board or Commission that has responsibility for each objective. The City has also adopted the Downtown Loveland Strategic Plan, which includes several objectives related to housing in the downtown area, including increasing housing density to match existing zoning, which would be about 25 units per acre instead of 16. The plan also includes affordable housing units as part of any new downtown development.

B. Zoning Code

The City’s Zoning Code (Title 18) was adopted in the 1970’s and has been updated over the past five years to address new uses and issues as they arise. The code is a fairly traditional, prescriptive zoning approach with residential lot sizes ranging from 6,000 to 7,000 square feet for detached single-family, and up to 9,000 square feet for multi-family uses. Smaller lot development is permitted in several residential districts (5,000 square foot lot minimum), which allows for less costly housing units. Low density residential uses are allowed in all zoning districts, except for the Public Park, Developing Resource, and the Developing Industrial Districts, which allows for live/work studios and workshops. Accessory dwelling units are permitted in the lower density residential districts and in the two-family and high density districts. These units were originally intended as “in-law” housing units. The Planned Unit Development District (PUD) allows residential developments with a gross density limit of 16 units per acre. Much of the new development in the city occurs with PUD zoning, which allows

greater flexibility in density and design, and involves a negotiated process to establish standards associated with the development. Manufactured housing units on permanent foundations are treated as single-family dwellings, so they can be located anywhere that single-family is allowed.

The City's Zoning Code defines family as "any individual or two or more persons related by blood, adoption, marriage, or an unrelated group of not more than three persons living together in a dwelling unit". This definition also includes licensed foster care of up to four children. Under this definition, four or more unrelated adults cannot legally share a housing unit. The primary reason to limit the number of unrelated persons is to avoid conditions of overcrowding and minimize the resulting impact on a neighborhood. There is no limit to the number of related persons that can live in a housing unit. The City enforces this definition only if a complaint is made. There have not been any complaints of overcrowding in the past five years.

Group homes provide an alternative form of housing for persons with disabilities and for seniors. Under Loveland zoning regulations, this type of housing is considered a group care facility, which requires state licensure for four to eight persons (developmentally disabled or seniors 60 years or older), or for a facility used for treatment, counseling or other rehabilitative care, and is only permitted subject to special review approval. Group care facilities with fewer than four persons fall under the definition of family, which means they can be located wherever residential uses are permitted.

Design requirements for single-family detached homes have long been an issue in Loveland. There are no standards in the Zoning Code for this and the requirements being requested by staff are negotiated in PUD. Most local builders are building homes to a level of increased design to meet consumer desires; however, the one area that continues to be of concern to builders and developers is garage placement. City policy is to require garages be set back from the front façade of the house, so that the garage does not visually dominate the appearance of the house. This policy has never been incorporated into the code, but is used for most residential developments. Other design elements such as roof pitch, porches, and window placement are also typically required in residential PUDs. Since these items are not in the code, there is no clear way for the developer or builder to know what the requirements will be until staff has reviewed the development at least once. Another issue raised is that there is a real or perceived lack of consistency from one planner to the next on requirements placed on developments. While the creation of the Development Review Team and the Development Review Center has helped, this is apparently still seen as an issue by some builders and developers.

C. Development Review Process and Development Fees

The creation of the Development Review Team and Development Review Center has helped to streamline the review process and provide a more coordinated review of development proposals. The number of new developments being submitted has been much lower than in past years, which has given City staff the opportunity to implement a program known as SMART - **S**pecific, **M**easurable, **A**chievable, **R**elevant and **T**ime-based – Objectives to improve the development process for planning and building permit applications. A status report on SMART is in process and shows reductions in the number of average working days for planning and building permit applications. Staff will continue to focus on process improvements and code amendments to further update the city's standards, submittal checklists, and the Special Review process. Another improvement recently made is that project submittals are now reviewed on a daily basis rather than weekly, and if complete, are placed on the review schedule the same week. Given the lower number of projects submitted, most are reviewed within one or two weeks; however, projects are still going through several rounds of review before being ready for a public hearing or administrative review. Affordable housing developments are given a priority for scheduling and review under the City's Affordable Housing Incentives. Developers have commented that the improvements made in the review process are positive.

Land development costs include the cost of land as well as the cost of utilities and streets to the lot. These costs are passed on to the builder and combined with development fees paid with building permits, which are then passed on to the home buyer in the price of a new home. The estimate for the average price of a developed lot (street, utilities, raw water) ready for a building permit is about \$50,000 depending on location and lot size. Some developed lots have sold at lower prices recently because of the decline in the housing market.

The City is working on a comparison of development-related fees with other Colorado communities. Information already available reveals that the fee total for an average single-family home in Loveland is \$31,598, while Fort Collins collects \$26,320 in similar fees and Greeley collects \$12,063. For a 48-unit multi-family building, Loveland collects \$988,134, Fort Collins collects \$833,947, and Greeley collects \$308,650. The Loveland City Council will consider reducing or waiving fees on a case-by-case basis for good cause shown. Loveland Habitat for Humanity and the Housing Authority have both received waivers for some or all of their associated development fees and other developers have also received fee reductions or waivers. Since these actions are on a case-by-case basis, the applicant does not have any guarantee that their request will be approved. Included in CEFs are fees for cultural services, fire, general government, library, law enforcement, parks, open space, recreation, trails, streets and schools, which are vital for the City to continue to provide the current level of service that is expected by residents. Several developers and builders interviewed for this study noted that these fees make it difficult, particularly for affordable multi-family units, to be financially feasible.

There is comparatively little residential development taking place in Larimer County in the Loveland area, although, as a result of the High Park fire west of Fort Collins, there will be an increased number of permits to re-build homes lost to the fire. Residents may request a waiver of some fees if their insurance will not cover the cost. The Town of Berthoud, to the south of Loveland, is seeing limited residential activity, while Windsor to the northeast of Loveland issued nearly 250 single-family permits in 2011. Neither community currently has affordable units, although Windsor will receive Low Income Housing Tax Credits to build a 40-unit workforce housing development with assistance from the Housing Authority of the City of Loveland. In the past decade, new homes in Johnstown (east of Loveland) provided some of the more affordable housing in Northern Colorado. As the housing market rebounds, these smaller communities are expected to see residential development increase, but units in the more affordable price range are not expected to make up a large percentage of the new units.

D. Development Incentives

The City has Affordable Housing Incentives to encourage the creation of affordable housing units. These incentives include design standards (buffer yard variations; reduced front setbacks; and open space playfield, street width, and lot size reductions), an expedited review process, and early calculation of fees. A use tax credit is also available once a Certificate of Occupancy has been issued. Deed restrictions are required on units to retain affordability, and stipulate what happens in the event of a sale. The early calculation of fees, when a development is designated as a Qualified Affordable Housing Development by City Council, has been the most-used incentive. This incentive offers significant savings for developments because the review process can take a year or longer, so having fees frozen means there won't be any unexpected increases. Affordable housing developments that have benefited from these incentives include Boise Village North, Brookstone Apartments, Giuliano Addition, Pinetree Village, The Reserve, Rockcrest Apartments, Waterford Place, and Mirasol. Since the inception of the affordable housing incentives, there have been more than 1,500 rental and for-sale affordable housing units constructed.

The City has also supported affordable housing in past years through the use of its annual Private Activity Bonds (PABs), issued through the Colorado Division of Housing. The bonds are used to encourage private investment in housing and give tax-exempt bonding authority to create loans at a tax-exempt interest rate, or to create mortgage credit certificates. PABs were used to finance several apartment developments in Loveland in the past decade. Loveland's 2012 direct allocation of Private Activity Bonds is capped at \$3,186,443 and is determined on the basis of the city's population. If this allocation is not used, it can be carried forward for an eligible project, or will revert to the Statewide Balance.

E. NIMBY Syndrome

NIMBY-ism has become a more significant issue for residential development in Loveland in the past five years. The number of appeals filed by neighbors of housing developments, as well as other types of developments, shows an increased level of concern by residents for all kinds of projects. Neighborhood opposition has occurred on both affordable and market rate housing developments and concerns have also been raised in neighborhoods where lower-priced homes have been introduced into an existing, established development. The downturn in the housing market resulted in some developments being left unfinished. As the housing market improves, these areas may be developed or built by groups other than the original developers, and as long as the City-approved design requirements are met, the sales prices of the new homes in a development, or the perceived quality (or lack of) is not an issue that the City can or will address. As more infill development occurs, the amount of concern over residential developments is expected to increase.

Representatives of local agencies noted that they would anticipate extreme neighborhood opposition for shelters or single-room occupancy units in Loveland.

F. Building Code

The City's Building Division is responsible for issuing building permits and inspecting new or remodeled housing in the city. The City uses the 2009 International Building Codes and the American National Standards Institute (ANSI A117.1-1998 – Accessible and Usable Buildings and Facilities) to address accessibility in multi-family housing units (triplex or larger). Items addressed by ANSI include building and unit entrances, accessible routes, doors and doorways, ramps, elevators and lifts, laundry equipment, toilet/bathing facilities, kitchens, windows, and storage facilities. ANSI standards are consistent with HUD's Fair Housing Accessibility Guidelines and the Federal Fair Housing Act (FFHA). The Fair Housing Act requires buildings that have four or more units to have minimum levels of accessibility. Colorado law also follows the Fair Housing Act requirements. Building Division staff noted that accessible housing units are often placed in the least accessible areas of the development (i.e. at back of the development) and suggests that the incentives be revised to require a proportionate distribution of accessible units throughout the development.

G. Neighborhood Revitalization, Municipal and Other Services, Employment-Housing-Transportation Linkage

Community Development Block Grant (CDBG) funds have been used in recent years to assist subrecipients with property acquisition and housing development, rehabilitation of existing housing units, and home ownership programs throughout the City, with the goal of building or improving affordable housing in a location that is accessible for many.

The City's three transit routes serve the community's residential neighborhoods and para-transit service is also available for persons with disabilities. Transit service is available to Fort Collins (where some human service agencies are located), as well as south to Longmont. Transportation was identified as a barrier to fair housing choice by many interviewed for this report. For households that do not have their own transportation, traveling between Loveland and Fort Collins (or Longmont) for appointments can take the better part of a day. For households with transportation, increasing gas, insurance, and maintenance costs can also serve as a barrier to fair housing choice. Bus routes are near many of the affordable housing developments, as well as employment centers.

The City of Loveland has developed new parks and trails throughout the community and has recently upgraded and expanded the Chilson Recreation Center and the Public Library, both of which are located in the downtown area. These services are available to all residents in the community. Park and trail development has occurred in all areas of the community, with much of the older area of Loveland being accessible to a trail system that links many key community facilities and commercial locations. See Map 4 in Appendix G for the parks, open lands, and trail system.

H. Tenant Selection Procedures

The Housing Authority of the City of Loveland uses homelessness as a local preference for housing assistance, followed by employment in Loveland. The Housing Authority currently owns and operates nearly 600 housing units and manages about 600 Section 8 vouchers. Other area agencies use similar priorities and preferences for selecting tenants, with those persons and families in crisis and most vulnerable typically receiving the highest priority for housing.

I. Property Tax and Other Tax Policies

Larimer County's property tax exemption program for seniors and veterans was reinstated for 2012 taxes payable in 2012. This tax program allows 50.0% of the first \$200,000 of real estate value of an owner-occupied property to be exempt from taxation. The exempted amount is repaid when the property is sold or if there are changes in the owner's circumstances that result in disqualification. A property tax program that will allow the applicant to work to offset a property tax bill with Larimer County is also available. The maximum amount of assistance under this program is \$400 per household and is based on the current Colorado minimum wage of \$7.64. The City of Loveland has a Food and Utility Sales Tax Rebate program for 2012. This rebate is for sales tax paid in 2011; participants must meet income guidelines.

J. Boards and Commissions

There are five citizen boards or commissions in Loveland that address housing and housing related topics. The **Affordable Housing Commission** provides recommendations to City Council regarding funding of bricks and mortar projects and, along with the staff of the Community Partnership Office, administers the City's Affordable Housing Incentives and Policies. The Commission has adopted several objectives under the City's Comprehensive Master Plan, including further developing a Housing Plan, developing a plan to address transitional housing for homeless persons in Loveland, and addressing housing/shelter for homeless youth.

The **Disabilities Advisory Commission** represents the interests of persons with disabilities by reviewing plans for buildings and new developments to ensure they meet ADA requirements for accessibility. A member of the Loveland Disabled Resource Services staff serves as an advisor to the Commission, and most of the Commission members have direct knowledge of issues around accessibility and the needs of the disabled. The Commission provides educational and informational sessions regarding accessibility issues to community groups and organizations.

The **Human Services Commission** reviews grant applications and provides recommendations to City Council as to how CDBG Public Service funding and Human Service grants should be directed. The Commission also provides input on HUD-required planning documents, and addresses social concerns in the community.

The **Planning Commission** makes decisions or recommendations on many land use items, including housing developments and planning documents, such as the Comprehensive Master Plan, and all Zoning and Subdivision Code amendments. The Planning Commission and the Affordable Housing Commission will be working on the development of a Housing Plan with City staff. Included in this plan will be goals that promote an appropriate jobs-housing balance for the community.

The **Transportation Advisory Board** advises on matters pertaining to all modes of transportation, reviews and recommends updates to the Transportation Master Plan, considers local and regional transportation matters, reviews and recommends changes to policies related to transportation, and examines the budget and capital improvements plan related to engineering, streets and transit. The board also reviews and recommends changes to transportation and transit fee rates and charges. A member of Senior Alternatives in Transportation (SAINT) sits on the board. SAINT provides transportation in Loveland for people 60 and over, and people with disabilities, who cannot drive.

When openings occur on City boards and commissions, a variety of methods are used to inform residents of openings. The City encourages applications from persons with diverse backgrounds to fill openings and is interested in finding prospective board or commission

members with experience and knowledge in the particular area in which the board or commission serves. Boards and commissions typically have diverse representation from women, seniors, persons with disabilities, and persons of minority or ethnic origin.

K. Public and Administrative Policies and Actions Concerning Development and Housing Activities, and Affecting the Approval of Sites and Other Building Requirements Used in the Approval Process for the Construction of Publicly-Assisted Housing

The Community Partnership Office administers the City's Community Development Block Grant (CDBG) funds and has provided assistance for programs that address homelessness and housing opportunities, promote self-sufficiency, and provide financial assistance for early childhood programs. The CDBG FY 2012 grant is \$288,239. Funds will be used for housing rehabilitation (Volunteers of America and Housing Authority); land acquisition for housing (Loveland Habitat for Humanity and Artspace); down payment assistance (Housing Authority); housing counseling and rent assistance (Neighbor to Neighbor); homeless case management (House of Neighborly Service and Crossroads Safehouse); and homeless shelter assistance (Crossroads Safehouse). The City's Human Service funding for 2012 totals \$450,000 and includes funding for transitional housing and victim services programming (Alternatives to Violence); adult education (Center for Adult Learning); transportation (SAINT, Elderhaus); food (Community Kitchen, Food Bank, House of Neighborly Service, Meals on Wheels); assistance to single parents (Project Self-Sufficiency); and other programs providing children and youth services, health and dental care, mental health services, and services for persons with disabilities.

The City of Loveland has assisted a number of housing and housing-related projects and programs with CDBG grants in the past five years. These include rent assistance to Neighbor to Neighbor; transitional housing and future shelter for Alternatives to Violence; emergency services, including shelter and homeless assistance to House of Neighborly Service and Catholic Charities' Mission; and housing and assistance to Project Self-Sufficiency. The City has also granted fee waivers for Habitat for Humanity's construction of new affordable housing in Loveland, Interfaith Hospitality Network's building of another transitional housing unit for homeless families, and rehabilitation of a building to be used by the Food Bank. The City's affordable housing incentives are available for all affordable housing developments, public or private.

The City's Community Partnership Office has adopted policies designed to encourage the development and dispersal of affordable housing throughout all areas of the community and continues to adhere to all directives issued by the U. S. Department of Housing and Urban Development for the administration of the CDBG Program. The staff works on housing-related topics with area housing agencies, including the Housing Authority of the City of Loveland, Neighbor to Neighbor, House of Neighborly Service, and Loveland Habitat for Humanity to ensure that housing and other needs are being met for Loveland residents. Many of these

agencies are also members of the Affordable Housing Coalition of Larimer County, a group of organizations and agencies that work to increase the supply of affordable housing in Larimer County through advocacy and public education. The coalition supports the provision of a full continuum of housing, the availability of housing for all residents, private/non-profit partnerships and incentives to provide low-income housing, and fiduciary responsibility to ensure that affordable housing resources are spent wisely.

The City of Loveland Development Review Team has worked to streamline the review process resulting in greater coordination and speed. As of August, 2012, it was reported that the new process resulted in a 38% reduction in average working days in City review for a building permit, and a 29% reduction in average total days in City review for planning applications. Because affordable housing developments are given a priority for scheduling and review under the City's Affordable Housing Incentives, developers are able to save money in the process, which can then be passed on to a low-income buyer.

L. Unlawful Segregation or Other Housing Discrimination by a Court, or a Finding of Noncompliance by HUD

There are no known determinations of unlawful segregation or other housing discrimination by the court, or a finding of non-compliance by HUD regarding assisted housing in the Loveland.

2. Private Sector

A. Sale or Rental of Housing

The rental vacancy rate in Loveland at the end of 2011 was 4.5%, while the vacancy rate of affordable units was 2.3%. Additional affordable housing units are expected to be available in the next several years with the construction of new homes by Habitat for Humanity, the Housing Authority's Mirasol senior development and several private developments (Enchantment Ridge and Boise Village North). As stated, the Housing Authority's waiting list includes over 2,200 households seeking assistance with housing, so there is a clear need for additional housing in the community.

The Housing Authority administers the **Larimer County Home Ownership Program** for the purchase of homes throughout Larimer County. This program provides a maximum loan of \$10,000 at a low interest rate and minimal closing costs. Households that earn 50.0% of AMI or lower may qualify for a loan that is deferred until the time of sale. Mobile homes on permanent foundations can be purchased using this program. Homes built prior to 1978 are tested for lead-based paint and if found, remediation is required. Since the beginning of this program, 678 households have received an average loan of \$7,000 to assist with their purchase. In 2011, 46 households received loans and, because of the low interest rates and lower home prices, demand for this program has been high.

B. Provision of Housing Brokerage Services

The Loveland-Berthoud Association of REALTORS (LBAR) has 328 REALTOR members and 94 affiliate members. The affiliates include lenders, appraisers, title companies, and others involved in the housing and real estate industry. REALTORS are required to take fair housing and fair lending training every three years as part of real estate licensure. Fair housing information is available through LBAR and at member and affiliate offices. Membership in the local real estate community is diverse, with women, minorities and persons with disabilities represented. Some real estate companies have staff that speak Spanish or have access to translation services. Members participate on City boards and commissions and on the boards of area non-profits.

C. Lending Policies and Practices

Local financial institutions and mortgage companies provide fair housing and lending training to their staff to ensure there is no discrimination through their lending policies and practices. The Community Reinvestment Act (CRA) encourages financial institutions to participate in community activities, particularly to assist low and moderate-income neighborhoods in the communities in which they do business, in order to reduce discriminatory practices against low income neighborhoods. Most area lenders participate in Colorado Housing and Finance Authority (CHFA) programs, as well as traditional FHA and VA loan programs. Several lenders offer programs specifically designed for first-time buyers; however, as a result of the recession and housing market, underwriting requirements have become incredibly strict and it is now even more difficult to get loan approval.

Most prospective homebuyers pre-qualify with a lender so they already know what their purchase price limitations are when they select a REALTOR. Homes under \$200,000 are becoming difficult to find and usually sell quickly. Prices for a townhome or condominium are usually lower, but the Homeowner's Association (HOA) dues (or condo association) may be a financial burden for the homeowner. Another issue with condominiums is that lenders may think too many of the units are owned as investment or rental units and as a result, are less willing to lend for non-owner occupied units. FHA loans now require the condominium owner's association to re-certify annually with FHA, to ensure the financial health of the association and some associations may not be willing to do this.

Appraisals are affected by the foreclosures in a neighborhood and most appraisals are going through a double-review to ensure that the home value on the appraisal is accurate. This double-review increases the cost of the appraisal.

Lenders noted that one of the biggest difficulties for first-time home buyers to qualify for a mortgage is credit history. Disputed items on a credit report are also becoming an issue,

resulting in additional purchasing limitations. Other issues include not being in a job long enough, low credit scores, and having a short sale or foreclosure on the credit history.

Reverse mortgages have become more popular, particularly for seniors who want to remain in their homes. Reverse mortgages are HUD-insured mortgages available to seniors 62 or older on their primary residence. The loan is based on the age of the homeowner, and value and location of the home. The proceeds are first used to pay off any existing mortgage and the remainder is used for living expenses. There is no mortgage payment and the title of the home remains in the owner's name. The owner is still responsible for property taxes and homeowner's insurance. When the property is sold, the reverse mortgage is paid off and any remaining equity goes to the owner or his or her heirs. Reverse mortgages may work well for those who don't want to pay a mortgage payment and who may need a monthly income; however, the loan balance will increase over time and the estate will decrease as the proceeds of the loan are spent. Fees for a reverse mortgage may be higher than a traditional mortgage and mortgage insurance is required. While Social Security and Medicare eligibility are not affected by a reverse mortgage loan, other need-based programs such as Medicaid are if the funds withdrawn from a reverse mortgage loan exceed the monthly income limit for the program.

The high numbers of foreclosures seen in Larimer County in past years were primarily the result of adjustable rate mortgages, or mortgages with interest-only payment requirements. More recently, job loss has contributed significantly to the number of foreclosures. A foreclosure stays on a credit report for seven years, although, after three years another home can be purchased if using an FHA loan. Higher debt-to-income ratios are permitted by FHA, with total debt in the 50.0% to 57.0% range, but FHA loans require mortgage insurance, which can add several hundred dollars to the monthly payment for insurance premiums. Lenders no longer use the traditional 30.0% ratio of housing costs-to-income, opting instead to use a total debt ratio, with 45.0% of income toward total debt as the maximum allowed for a conventional loan.

The 2008 financial crisis resulted in a \$40 billion multi-state Attorneys General settlement with the nation's five largest banks - Bank of America, Chase, Citi, GMAC/Ally, and Wells Fargo – over improper mortgage and foreclosure practices. Colorado will receive \$204.6M for its settlement to be used for loan modifications, refinancing benefits for homeowners who are underwater on their mortgages, and payments to homeowners who lost their homes between January 1, 2008 and December 31, 2011. This settlement may help homeowners who are still in their homes, as well as those who lost them through foreclosure.

Discrimination in mortgage lending is prohibited by the Federal Fair Housing Act (FFHA), making it unlawful to engage in lending practices on the basis on race, color, national origin, religion, sex, familial status, or disability. Discriminatory lending could include refusing to make a loan or not providing information about a loan; imposing different terms or conditions (interest rates, points, fees) for different applicants; appraising property lower or higher for a particular

applicant; or refusing to purchase a loan. The Federal Financial Institutions Examination Council (FFIEC) collects data and monitors mortgage lending in the United States through the Home Mortgage Disclosure Act (HMDA). The information used in this report includes government-backed loans (FHA, VA, FSA/RHS) and Conventional loans for homes purchased in Loveland. Information on the lender's Community Reinvestment Act (CRA) activities and rating is also available through FFIEC. All local lenders had at least a satisfactory rating, with two lenders rated as outstanding, in the FFIEC evaluations completed between 2000 and 2010.

Lending practices for home mortgages in the Loveland area for Reporting Year 2010 (most recent data available) are summarized in the tables below. This data is for all home purchase loan applications submitted by Loveland residents, with 69.0% approved and 14.0% denied by the lender.

Table 26: Status of Home Loan Applications: 2010		
Status	Number of Loans	Percentage of Loans
Loan Originated	2,224	69%
Application approved/not accepted by applicant	135	4%
Application denied by lender	454	14%
Application withdrawn by applicant	363	11%
File closed - incomplete	64	2%
TOTAL LOAN APPLICATIONS	3,240	100%
Source: Home Mortgage Disclosure Act Data, Table 1, Reporting Year 2010		

Table 27 below illustrates the status of home loan applications by race and ethnicity. Native Americans had the lowest rate of loans originated, while the highest denial rates were for Native Americans and Pacific Islanders. For Hispanic/Latino applicants, 60.0% had their loan originated while 19.0% had their loans denied. In contrast, non-Hispanic/Latino residents had a 74.0% loan origination rate and a 10.0% denial rate.

Table 27: Status of Home Loan Applications by Race & Ethnicity: 2010			
Race	Percent Originated	Percent Approved Not Accepted	Percent Denied
African American/Black	65%	12%	12%
Asian	74%	4%	7%
Caucasian/White	73%	5%	10%
Native American	55%	0%	27%
Pacific Islander	75%	0%	25%
Ethnicity			
Hispanic/Latino	60%	9%	19%
Non-Hispanic/Latino	74%	5%	10%
Source: Home Mortgage Disclosure Act Data, Tables 4.1 – 4.4, Reporting Year 2010			
Note: other outcomes such as \ application being withdrawn or file closed due to incompleteness were not included in this data			

Table 28 on the next page shows the reasons for loan denials by race and ethnicity. The most commonly reported loan denial reasons were lack of collateral and debt-to-income ratio. For

persons of Hispanic/Latino origin, the denials based on debt-to-income ratio and credit history were significantly higher than the denial rates for non-Hispanic/Latino homebuyers. Denials for lack of collateral were highest for African Americans and all non-Hispanic/Latino applicants. Pacific Islanders had higher denial rates, when compared to the overall population, for insufficient cash, incomplete credit applications, and other reasons.

Table 28: Home Loan Denial Reasons by Race& Ethnicity: 2010

Race	Debt-to-Income Ratio	Job History	Credit History	Lack of Collateral	Insufficient Cash	Info. not Verified	Incomplete Credit App	Mort. Ins. Denied	Other
African Amer./Black	19%	2%	19%	37%	0%	0%	10%	0%	10%
Asian	21%	2%	10%	22%	0%	12%	10%	0%	24%
Caucasian/White	20%	2%	10%	21%	15%	5%	11%	1%	16%
Native American	27%	7%	33%	13%	0%	0%	0%	0%	20%
Pacific Islander	0%	0%	0%	0%	33%	0%	33%	0%	33%
By Reason (all races)	20%	2%	10%	21%	14%	5%	11%	0.001%	16%
Ethnicity									
Hispanic/Latino	30%	2%	23%	13%	0%	4%	11%	10%	8%
Non-Hispanic/Latino	9%	3%	6%	33%	1%	7%	17%	0%	24%

Source: Home Mortgage Disclosure Act Data, Tables 8.1 – 8.4, Reporting Year 2010

Although the analysis of the HMDA data on Tables 26-28 is not conclusive, it does provide background into local lending practices. Based on this information, Hispanic/Latino applicants had a higher rate of denial for mortgages than the entire applicant population. Some of the reasons for these loan denials are not necessarily related to fair housing or discriminatory practices and may be due to issues such as credit history or debt-to-income ratios; however, this is an area that will be reviewed and evaluated in all subsequent fair housing studies

Lenders interviewed during this study noted that it is still difficult for many people to qualify for home mortgages due to past credit history. Households that go through a foreclosure can expect to have the foreclosure on their credit report for seven years. Homeowners are usually able to overcome a credit history that includes a short sale in less time.

3. Other Fair Housing Activities

A. Fair Housing Enforcement

Fair Housing enforcement is handled in Colorado by HUD's FHEO Office and the Colorado Civil Rights Division. The Housing Authority of the City of Loveland and other local housing organizations and advocates refer housing discrimination complaints to HUD. Data on housing discrimination complaints filed over the past five years is discussed in Section Three of this report and the results of a questionnaire distributed for this report are in Section One. While there was no finding of housing discrimination from the complaints filed, the information

collected from questionnaires, as well as the fact that complaints were filed, indicates that housing discrimination may be occurring and that there is a lack of clear understanding of what constitutes discrimination.

B. Language and Culture

With the increasing population of persons of Hispanic/Latino origin, there is an increase in the number of persons whose first language is Spanish. The awareness level of potential language barriers also appears to be increasing. Many of the agencies and organizations have bi-lingual staff or have access to translation services; however, rental and leasing agents and landlords may not have bilingual or translation services available for prospective tenants who do not speak English. As immigrants from other areas of the world move to Loveland, more languages will be introduced to the area and the need for translation will increase. In addition to language being a barrier, a lack of knowledge about a particular culture can also be a barrier. The Housing Authority provides publications in Spanish, as do many of the area agencies and organizations, although Spanish is the only language other than English in which most agencies are able to provide comprehensive services.

The Community Partnership Office will support and encourage sub-recipients of CDBG funding to make a good faith effort to market their housing opportunities to individuals and organizations with clients who are least likely to apply for these opportunities by targeting advertising and other information to community members that are not otherwise represented in the ethnic and racial make-up of their current clientele. This may include developing marketing materials in languages other than English and Spanish.

The **Thompson School District** had over 700 students (5.0% of total enrollment) receive some form of English Language Acquisition (ELA) assistance during the 2011/12 school year and about 400 of these received actual language support. These students represent 27 different languages from around the world, with Spanish the most prevalent, followed by Russian and Mandarin. The demand for ELA resources has remained fairly stable at the school district in the past several years, as students who leave the district are replaced by newly enrolled students who do not have English skills at an adequate level. Of the children who attended the Colorado Pre-School Program during the 2011/12 school year, 20.0% had language needs.

In August of 2000, Executive Order 13166 "Improving Access to Service by Persons with Limited English Proficiency" (LEP) was issued, requiring federal agencies to assess and address the needs of those who have a limited proficiency of English and, as a result, may not be able to fully participate in or benefit from programs for which they are otherwise eligible. This order requires that an LEP policy be adopted and implemented. The recommended threshold for providing written translation of vital documents is when a particular LEP language group reaches 5.0% of the community population or 1,000 people whichever is less. In the 2006 - 2010 American Community Survey, data notes that 3.0% of the Loveland population over the

age of five is Spanish-speakers, followed by those who speak Asian or Pacific Islander languages and Indo-European languages. The Center for Adult Learning had approximately 175 students during the 2011/12 school year attending English language classes, speaking a total of 19 languages. During the current school year, the Center for Adult Learning has 90 ELS students that represent 13 languages.

In 2010, the **Intercultural Community Builders** organization was formed to assist people from other cultures. This volunteer group assists families with limited English in understanding lease agreements, accessing available housing, and learning to save money for housing costs. Mentoring programs and workshops for teens are planned for 2012, and plans for expanding into Loveland from their Fort Collins location are being made.

C. Marketing to Least Likely to Apply

The Housing Authority is the largest provider of housing in the City of Loveland with close to 600 units of housing on 12 properties and 548 Section 8 vouchers, of which 86 are designated for persons with disabilities and 100 are project based. The Housing Authority submitted an Affirmative Fair Housing Marketing Plan for Multifamily Housing in March, 2013. A letter was received shortly thereafter approving the plan. When the report was put together, the Housing Authority determined that the groups Least Likely to Apply are Asians (1% project residents compared with 1.3% Census Tract and 2% in the Housing Market Area) and Native Hawaiians/Other Pacific Islanders (0% residents compared with 0.1% Census Tract and 0% in the Housing Market Area).

Marketing to the Least Likely to Apply populations, by the Housing Authority, occurs primarily through the Larimer County Department of Human Services, Neighbor to Neighbor, House of Neighborly Service and Larimer County Workforce Center. The Housing Authority also provides information to the following groups on a regular basis to assist in reaching families in need of housing: Poudre Valley Health System Healthy Kids Club, Loveland Public Library, Mary Blair School, and the Larimer County Food Bank. Brochures and housing information (in both English and Spanish) is mailed to families on the Housing Authority wait list and families needing housing. Language translators are provided upon request and TDD assistance is also available.

D. Housing Rehabilitation

The Housing Authority administers the **Larimer Home Improvement Program (LHIP)** for homes located in Larimer County and many neighboring communities (excluding Fort Collins). This program offers low or no interest loans to income-qualified families who want to make repairs or improvements to their home. Homes built prior to 1978 are required to be tested for lead-based paint and if found, remediation meeting EPA standards must be done. There is also an emergency grant program for households earning no more than 50.0% of AMI for emergency repairs such as repairs to or replacement of water heaters or heating systems, or repairing

burst pipes. In 2012, the LHIP program was expanded to offer low-cost improvement loans to rental property owners in Larimer County. Funding for the rental repair program is provided by 1st Bank. The goal of this program is to “improve the safety, integrity, accessibility and curbside appeal of rental properties in the area”. Since its inception, LHIP has improved 267 homes; 27 were in 2011. In recent years, more energy efficient improvements have been requested by homeowners through this program.

Local agencies that work with persons with disabilities have stated that accessible housing units are difficult to find and the location may not be desirable for someone with mobility barriers. **Volunteers of America** operates the Handyman Program, which can be used to install ramps, grab bars, chair risers, handrails, and wheelchair ramps on owner-occupied homes for persons with disabilities.

E. New Affordable Housing Construction

The City’s Single-Family Building Activities Tracking Matrix provides a listing of approved single-family lots ready for building permits. As of the end of June, 2012 there were 2,492 approved single-family lots and 708 of these were permit-ready. Affordable lots were left at Boise Village North, Willow Park, and Enchantment Ridge.

The **Loveland Habitat for Humanity** affiliate has constructed 106 homes since it started, and plans to build an average of 10 homes each year. Habitat serves families earning 30.0% to 60.0% AMI. Homes are planned in the Willow Park Subdivision (5), Boise Village North (9), and Sierra Valley (21), as well as in Habitat’s own development, which is located on SE 2nd Street (4). Loveland Habitat for Humanity recently completed a home for a veteran returning from Iraq who has five children.

The **Housing Authority** has the second phase of Mirasol under construction for 60 new rental units. The first phase of the development included 49 rental units, as well as single-family and paired homes that are for rent or purchase. A community events center, community garden, and fitness center are also available for the residents of Mirasol. Some units within Mirasol are income-restricted, while others rent at market rate. A future phase of Mirasol will be for “green houses” which offer skilled nursing care 24/7 in a non-institutional setting. When fully developed, Mirasol is expected to have 224 housing units of various types for seniors. The Housing Authority is also working on the development of 20 housing units for homeless veterans and 60 units of workforce housing on the site of the former water park in east Loveland.

Private developers are also building affordable units in developments such as Enchantment Ridge and Boise Village North. Affordable homes in Boise Village North start at the \$170’s. New homes, by Aspen Homes in Enchantment Ridge, that meet the City’s affordable housing pricing start at \$156,000. Both developments have architectural and design requirements that

address garage placement and building fronts. Loveland Midtown Development is also building homes in the Madison Avenue Subdivision at First and Madison.

Pedcor Investments, LLC has shown interest in developing more than 200 affordable housing units near the Wal-Mart in north Loveland; however, the developer recently noted that they feel the City's development fees are onerous and without rebates, fee reductions, discounts or grants, they can't make the project work financially. Pedcor has developed market rate to affordable housing communities throughout the Midwest and Western United States, with over 10,000 units completed.

Another potential affordable housing development is the Artspace Lofts, proposed by **Artspace Projects, Inc.** This organization has built affordable space for artists throughout the country and uses a preference for artists when selecting prospective tenants. The first phase of this project, planned for 2013, will be the construction of 30 housing units, with a second phase planned for the renovation and transformation of the historic Feed & Grain building into studios and space for arts organizations and creative businesses. Artspace provides fair housing training to the committees established in each community to assist with tenant selection. In 2010, Artspace conducted a survey in Loveland of the local arts organizations and businesses to determine needs and preferences. This survey had over 400 responses from local artists and related businesses, with over one-third expressing interest in relocating to a multi-use arts facility in downtown Loveland. One-third (139) also expressed interest in renting a live/work space.

F. Rental Subsidies and Programs

The **Housing Authority of the City of Loveland** manages 548 Section 8 vouchers and owns/operates 587 units of rental housing, which are primarily two-bedroom units. In addition to providing rental housing assistance, the Housing Authority offers a variety of programs for residents. The staff have a Quality of Life Team that sponsors events and programs for residents throughout the year, including swim parties, Veteran's Day ceremonies, support for the Resident Advisory Councils, scholarship programs, and self-sufficiency programs. Housing Authority staff operate the Kids Club at the Maple Terrace Apartments and the Educational Enrichment Scholarship (E.E.S.), which is a program for residents that have at least one year of residency in a Housing Authority program, are at least 17 years of age, and have either a high school diploma or GED. The scholarship is a maximum of \$1,500 per person, per semester and is based on financial need.

The Housing Authority also operates the Section 8 Homeownership Program. This program encourages Section 8 households to apply their vouchers toward a mortgage payment. Other assistance programs can be used to make the homeownership program successful, and may include down payment and housing rehabilitation programs. Many of the Housing Authority's scattered site homes were sold through this program.

G. Transitional Housing

Transitional housing is available through the **Interfaith Hospitality Network (IHN)** at five transitional housing units. Other area agencies provide transitional housing for specific homeless populations, including domestic violence victims (**Alternatives to Violence, Crossroads Safehouse**); single-parent families (**Project Self-Sufficiency**); youth behavior/mental health/substance abuse (**Turning Point**); and mental health (**Touchstone Health Partners**). The City's 2010 – 2015 Consolidated Plan noted an unmet need for 40 transitional housing units – 20 for homeless families and 20 for homeless individuals. These numbers are likely understated by at least double.

SECTION FIVE

Conclusions and Fair Housing Action Plan

The Impediments to Fair Housing Choice and Fair Housing Action Plan in this section have been identified through interviews with representatives of area agencies and organizations, analysis of data, and the results of the questionnaire distributed by participating agencies. Previous Analysis of Impediments to Fair Housing Choice reports for Loveland included items that were barriers to affordable housing, as well as impediments to fair housing choice. The impediments identified in 2007 were as follows:

1. 2007 Impediments

- Housing discrimination.
- Development related (including residential design standards, development review process, and land development costs and fees).
- Transportation.
- Lack of affordable housing units for low/very low-income households, larger units for families, emergency/transitional housing units for those persons who are homeless, and housing units that provide accessibility for persons with disabilities.
- Foreclosures and credit history.
- Language and culture.
- Income and wage levels.
- Decrease in funding.

HUD has provided guidance and clarified that “a barrier to affordable housing is a condition or circumstance that impedes housing choice on an equal opportunity basis. An impediment to fair housing choice is a condition or circumstance that impedes housing choice/access to housing based on one or more of the following protected classes: race, color, national origin, sex, religion, familial status, and disability”.

With this guidance in mind, and considering actions taken over the past five years to further fair housing while simultaneously addressing affordable housing, results produced by the Community Partnership Office (CPO) are listed below. With less than \$250,000 annually in bricks and mortar funding, the CPO is primarily able to invest in rehabilitation projects and

monitor closely for discrimination of protected classes.

1. A Housing Needs Assessment was completed in 2009 to gather suggested actions and strategies to incorporate more accessible units into Loveland's housing stock.
2. 100% of CDBG funds granted to subrecipients over the past five years have been used to address homelessness and housing opportunities.
3. CPO staff attended meetings of the Disabilities Advisory Commission to further conversations with the Commission about both fair housing and affordable housing for persons with disabilities.
4. The Affordable Housing Commission, CPO, and the City of Loveland Current Planning Manager worked to draft amendments to Title 18 of the City of Loveland Municipal Code to make density and zoning requirements more amenable to affordable housing developments in order to increase the number and availability of units for low-income persons with disabilities.
5. Funding allocated to subrecipients for both bricks & mortar and public service projects are monitored for client race/ethnicity to determine if funding spent is reaching minority populations. A question about reaching disabled clients has recently been added to required subrecipient reports to track this information as well.
6. The City of Loveland has been paying the cost of a day shelter for the homeless that is operated by a local nonprofit. Funding is also allocated to Interfaith Hospitality Network to provide overnight and day shelter for homeless families, and to the House of Neighborly Service to provide overnight shelter for homeless individuals.
7. The CPO worked with local advocates to encourage the federal government to increase funding for housing vouchers.
8. The CPO worked with area non-profit agencies, the North Front Range Metropolitan Planning Organization, United Way of Larimer County, Healthier Communities Coalition of Larimer County, and the Cities of Loveland and Fort Collins to develop and adopt a transit strategic plan, and to develop a Mobility Council that is working to streamline transportation services with housing and human service organizations, including transportation service that runs from Fort Collins to Longmont.
9. The CPO has been working with an out-of-state developer for two years to bring 224 units of affordable housing to Loveland. Included in any incentive packet will be an incentive to build a percentage of the units for persons with disabilities.
10. The CPO invests in organizations that provide services to the homeless, residents with limited English proficiency, transportation and food for the disabled and seniors, and displaced victims of domestic violence.

2. Fair Housing Action Plan

The 2012 Fair Housing Action Plan is intended to provide a framework for addressing and improving fair housing choice for the next five-years. Actions are recommended to address the identified impediments.

2012 Impediments to Fair Housing Choice
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Housing discrimination:

Housing discrimination appears to be taking place, particularly for persons with disabilities, in the area of reasonable accommodations. Many people, both tenants and landlords, may not understand housing discrimination, including what it is, how it occurs, and what they can do about it. Nor do they understand reasonable accommodations required by the Americans with Disabilities Act.

Actions:

The Community Partnership Office (CPO), along with the Housing Authority of the City of Loveland, Disabilities Advisory Commission, Human Services Commission, Disabled Resource Services, and area housing agencies, specifically Neighbor to Neighbor, will promote the distribution of information on fair housing to clients, representatives of the Real Estate industry (including apartment owners and managers), and the lending industry, through public awareness events and meetings. The CPO will support the Disabilities Advisory Commission, Disabled Resource Services, and Building Inspection Office to develop printed information regarding disabilities and reasonable accommodations that can be made to address these special needs

The CPO will support the Disabilities Advisory Commission, Disabled Resource Services and other organizations that serve persons with disabilities, Building Inspection and Current Planning to explore projects and programs that address housing accessibility, including the need for and design of accessible housing units and developments, visitability and practical housing standards.

The CPO will distribute a survey, similar to the survey that was distributed for this report, at least every other year to ask questions about housing discrimination. The survey will also be used as a tool to continue to inform Loveland residents that housing discrimination is illegal and resources exist to assist in filing a complaint.

The CPO will place Fair Housing posters at places where low-income residents receive services other than housing, such as the Food Bank, to hopefully reach more people in our community who may need assistance.

The CPO will ensure that local housing providers and services organizations receive information

on Immigration and Fair Housing, including the legal way to ask questions to determine the legal status of a community member seeking housing.

Hispanic/Latino households appear to have higher mortgage loan denial rates than non-Hispanic/Latino households. The reasons behind these higher loan denial rates may be simply due to credit history or related issues, but this cannot be determined from the available data and is a consideration that will be monitored. As a starting point, additional data from the Federal Financial Institutions Council (FFIC) website will be monitored annually.

Language and culture:

Language is a barrier to fair housing choice, and is particularly difficult when the process of renting or buying a place to live is involved. More people who speak languages other than English or Spanish are locating to Loveland and translation services may be needed for these other languages.

Actions:

The CPO will develop and adopt a Limited English Proficiency (LEP) policy and plan consistent with Executive Order 13166 “Improving Access to Service by Persons with Limited English Proficiency”.

The CPO will support area agencies to continue to develop written materials and other outreach efforts in Spanish, as well as other languages, as may be needed. If possible, the CPO will locate local consultants able to provide cultural competency training for area agencies and Real Estate industry professionals.

The CPO will ensure that agencies and organizations that provide housing are able to access a translation service should a client that speaks a language other than English or Spanish seek housing or other services. They will also be provided with “I speak” cards.

Marketing to Least Likely to Apply:

There exists the possibility that racial/ethnic minorities have disproportionately higher housing needs as shown on Table 24 (p. 31), which indicates that Native Americans and Pacific Islanders are underserved compared with City of Loveland residents living in poverty and eligible for housing through the Loveland Housing Authority.

Actions:

The CPO will monitor final reports from subrecipients as part of the overall monitoring process to ensure equal benefit to individuals or groups based on protected class status given that City of Loveland CDBG funding is not limited to a specific geographic location or concentration of a specific protected class.

The CPO will work with agencies that are providing housing to market to individuals and

families that are least likely to apply for their housing, including working to identify the manner in which targeted groups may receive information about available housing.

Affordable Housing:

A lack of affordable housing units disproportionately affects some protected populations, including accessible housing for persons with disabilities and housing for single-female parent families. The disproportionality analysis for this report showed that persons with disabilities and families headed by a single-female are more likely to be living in publicly-assisting housing and could benefit from additional affordable housing.

Actions:

The CPO will continue to facilitate the provision of housing for persons with disabilities by directing funding to developments that support this population.

The City of Loveland will continue to promote a mix of housing unit types for residents of all income levels, particularly in locations that provide convenient access to public transportation (COLT) and employment opportunities.

The CPO will continue to support the provision of services for those who are homeless, including additional transitional housing opportunities and rental assistance, by directing funding to agencies and organizations that provide these services.

The CPO will support area housing agencies to promote the retention of the existing housing stock by directing funding to projects that provide housing rehabilitation and provide accommodations for persons with disabilities.

The CPO will work with the Disabilities Advisory Commission to ensure their expertise in the area of accessibility is sought for new low-income single family or multi-family units being built in Loveland. Information about accessibility will be shared between the Affordable Housing Commission and the Disabilities Advisory Commission to ensure that two groups are addressing the housing needs of disabled residents.

Accommodations will be made for any individual wishing to participate in any public meeting that is coordinated through the Community Partnership Office. The City of Loveland will make available an amplification device for a community member with a hearing impairment wanting to attend a City Council meeting. The CPO will locate someone able to provide American Sign Language and Spanish language translation should that need arise. Printed material will be available in large print upon request. This information will be added to notices and will be advertised using a local non-profit called Audio Information Network (www.aincolorado.org), which provides broadcast and audio information for Colorado's blind, visually impaired, and print disabled residents.

It was brought to the attention of the CPO that there may be discrimination based on the source of income. That is, holders of Section 8 vouchers may find it difficult to rent an apartment; landlords would rather rent to full pay occupants. The CPO will work with the Housing Authority to track how often this occurs.

Barriers to Affordable Housing

In addition to the impediments to fair housing choice identified above, several items that function as barriers to affordable housing in Loveland were noted during interviews and are included in this report. These items were also identified in 2007 as impediments. They are:

1. Land development costs, development fees, and some development standards

The City of Loveland will continue to monitor and evaluate the impact the City's development review procedures, fees, and development standards have on the cost of housing. The effectiveness of the City's incentives for affordable housing will also be evaluated and other potential incentives be explored.

2. Nimby syndrome

The City of Loveland should explore and develop new techniques for informing and involving the public about development proposals, particularly for housing developments that address a demonstrated need in the community, such as for affordable housing or shelters. The CPO will take an active role in working with the neighbors of affordable housing developments to help ensure their completion without resistance.

3. Foreclosures, credit history, and income

Funding will continue to be directed toward programs and activities that provide assistance with consumer financial issues, including case management in the areas of foreclosure prevention, mortgage counseling, rental counseling, and financial and budgeting counseling. The City of Loveland will continue efforts to increase the number of higher-paying jobs and provide access to education and training opportunities, to improve opportunities for earning a living wage.

4. Lack of emergency and transitional housing units for homeless families and individuals and a lack of affordable housing for all populations

The CPO will collaborate with the Continuum of Care and other area housing and advocacy groups to find ways to increase awareness about the need for emergency and transitional housing for homeless families and individuals, as well as to work to secure the resources necessary to address these needs. There is also a need for additional affordable housing units

to serve the low and moderate-income population in Loveland and public-private collaborations will continue to be explored to provide solutions for this need.

5. Transportation

Transportation continues to be a barrier for households that live on a limited income and who do not have their own transportation. For those with transportation, increasing gas, insurance, and maintenance costs make it difficult for some households to afford. City transit routes have expanded in recent years, but proximity to bus routes and bus stops affect housing locations for those seeking affordable housing. Future transit route planning should take into consideration the location of existing and planned affordable housing developments. Funding will continue to be directed toward programs that provide transportation assistance.

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APPENDIX A – Fair Housing Questionnaire

Fair Housing Questionnaire – City of Loveland

The City of Loveland's Community Partnership Office would like to understand the barriers people face when looking for housing in Loveland. All information given will remain confidential and will only be used to identify common barriers. Thank you for your participation. If you need assistance completing this questionnaire, please contact us at (970) 962-2517 or (970) 962-2705 between the hours of 8:00 AM and 5:00 PM.

*Please return your completed questionnaire no later than **July 31, 2012** to the
Community Partnership Office, 500 East Third Street, Suite 210 Loveland, CO 80537
or to the agency that gave you this survey.*

1. What type of housing are you living in now?

Apartment ____ House ____ (Rent ____ or Own ____) Motel ____

Mobile home ____ (Rent ____ or Own ____) Car/campground/shelter ____

Staying with family ____ Staying with a friend ____

Other (please explain) _____

2. How long have you lived there?

Less than 3 months ____ 3 - 6 months ____

6 -12 months ____ 1- 2 years ____ 3 - 5 years ____ More than 5 years ____

3. How many bedrooms does this housing have:

Studio ____ 1 ____ 2 ____ 3 ____ 4 ____ 5+ ____

4. Including you, how many people live in this housing?

1 ____ 2 ____ 3 ____ 4 ____ 5+ ____ How many are adults? ____

How many are children:

age 5 and under ____ age 6 - 11 ____ age 12 - 15 ____ age 16 -18 ____

5. How much of your income is spent on rent and utilities each month:

Up to 30% ____ 30% - 50% ____ 50% - 75% ____ over 75% ____

6. Have any of the following things ever been a problem for you when looking for housing to rent or buy in Loveland?

☐ I can't afford the deposit

☐ My income is too low

☐ I have credit history issues

☐ Lack of housing I can afford to rent

☐ Housing I can afford is too far away from bus routes

☐ Housing I can afford is too far away from work

☐ Housing I can afford is too far away from schools

continued on the other side....

☐ I don't have my own transportation
☐ I can't get bus service close to my home, work, or the services I need
☐ Housing was too small/too big for the number of people in my family
☐ Landlord refused to make an accommodation for my disability
☐ I can't get housing information in Spanish or other language
☐ Lack of housing I can afford to buy
☐ I can't find a real estate agent of the race, ethnicity, disability or gender I prefer
☐ Real estate agents showed me housing I could afford only in certain areas
☐ I was given a loan with a higher interest rate than normal
 Other (please explain) _____

7. If you want to move but feel you can't, what are the reasons?

8. Have you ever been denied housing in Loveland for any of the following reasons:

Race /color ____ national origin ____ gender ____ family size or type ____ disability (physical, mental, medical) ____ religion ____

Did you file a housing discrimination complaint?

Yes ____ What happened with your complaint? _____

No ____ Why not? I didn't think I had a complaint ____ I didn't know how to file a complaint ____ I didn't have the time/didn't want to file a complaint ____

other _____

9. If you want to talk with us about your particular experiences, please give your first name and a contact phone number and we will call you.

First Name _____ Phone Number _____

Or you can contact us at (970) 962-2517 or (970) 962-2705 between the hours of 8:00 AM and 5:00 PM or send e-mail comments to: alison.hade@cityofloveland.org

Mail to:
 Community Partnership Office
 500 East Third Street, Suite 210
 Loveland, CO 80537

*Your fair housing rights are federally protected. If you feel your rights have been violated, you can file a complaint directly with the **U.S. Department of Housing and Urban Development** by calling **(800) 669-9777**, or you can receive assistance by calling the **City of Loveland Community Partnership Office** at **(970) 962-2517**.*

FAIR HOUSING QUESTIONNAIRE ADDITIONAL RESULTS

Question 6 (Other) Have any of the following things ever been a problem for you when looking for housing to rent or buy in Loveland?

Respondent #	Response
4	Respondent selected all problems
7	Gas shut off
8	Respondent selected all problems
10	Navy HUD(bash?) program, Food stamps declined
24	I have a companion animal and apartments are saying "No Dogs" period, even service animals.
29	I haven't looked into finding a place yet.
30	Need 1 level wheelchair handicap accessible
49	I'm single they don't give housing for single poor people
51	I'm satisfied here
56	Porque no tengo seguro social (Because I don't have social security)
77	I have a son and no job and am trying to go to school.
93	Wheelchair
107	I believe that the bus routes need to stop at more places than they do. Its hard to walk far when the bus doesn't stop.
125	My animals (dog, cat)
131	no job
139	A real estate agent wouldn't show us a place cause we didn't make enough money
147	Age discrimination
148	Have no income at all
179	I can't even afford to buy
198	Checked credit history, but wrote: Only rental history, hadn't ever rented
199	Homeless - Neighbor to Neighbor helped , we are ok now. We appreciate the help we got to go from homelessness to renting. Thank You!
207	plus high/increasing medical costs
218	pets not allowed or limited
234	need more bus stops and better routes, need sitting to wait for bus.
235	Homeless can't afford housing at this time
236	Section 8 is too low for places out here
237	Can't even qualify for a loan does not apply
240	Have section 8, looking
241	I have not heard from Housing Authority on reference to an apartment
246	Rent too much for the place, slumlords!
259	lack of 'first time homebuyer' education or protection
263	I just got a new car and payments are high and getting in the way
265	I have a place until my husband dies.

309 Usually owned my house didn't need to rent

Question 8 (Other) Have you ever been denied housing in Loveland for any of the following reasons:

Respondent #	Response
11	New I wouldn't get it. Is bullcrap
30	No handicap/wheelchair apartments available for people under 62 that are section 8 or 30% of income or help with obtaining section 8 voucher to find somewhere to go.
31	Didn't know how to file, Didn't have the time or desire to file, y tocado puertas pero sin repuesta (I knocked on many doors, but no response)
43	Denied housing because of husband
44	My move date isn't until 9/1/12, and I don't know how to file a complaint.
104	por no saber ingles (Experienced discrimination because respondent does not know English)
105	Miedo (fear)
107	Didn't have the time/didn't want to file, Landlord said I had to move he was not going to except my housing Section 8 anymore (because of codes)
108	No hablo ingles (I don't speak English)
111	Just feel not necessary not all people are that way
112	Went to see a four plex and talk to the landlord and he didn't rent it to me because of my credit history
113	I thought we would be treated equally
114	Discrimination
117	Income too low
147	Age
148	Never happened to me
167	Credit history
221	Never attempted to get my own house yet
236	Marked: race/color, gender, and family size or type
261	didn't think they had a complaint, didn't know how to file complaint, was late on deposit
285	- L. Housing Authority
290	No tener seguro social (Don't have social security)
	Dates and arranging moving conflict

APPENDIX B – PUBLIC COMMENTS

(Received 12/5/12)

Alison, after reviewing this, I thought I'd respond. In the 1990's and early part of this decade, Disabled Resource Services had a relatively small wait list for sec. 8 vouchers and people who were waiting for vouchers were not homeless, mostly low income. Over the past 5 years we saw a huge number of people with disabilities become homeless or were very near homelessness. The increase we saw corresponded with the recession (depression) that occurred about that same time (2007-2008). We now have about 35 families or single people with disabilities who are homeless-on the streets, couch hopping or living in automobiles. The numbers are probably much higher. Problem is: we don't get enough sec. 8 vouchers to house all the homeless folks. We direct these people to Loveland Housing Authority or privately owned housing that is HUD subsidized but there are wait lists everywhere they go. Also, it is difficult coming up with security deposits when one's income is less than \$800.00/mo., Social Security Disability, SSI or Aid to Needy Disabled. There is not enough HUD housing or transitional housing in Larimer County to meet the demand. I am seeing all age groups who are homeless and an increase in homeless seniors.

Because of all the foreclosures and fires, there is a demand for rentals in Larimer County, which has driven rent prices higher here. The October 12, 2012 DENVER POST reported that rent prices in Ft. Collins/Loveland are now the highest in the state of Colorado. That makes it even more difficult for a disabled person on a fixed income to find affordable housing. Many of my clients are paying 90% of their income for rent which might be a studio apartment or a small 1 bedroom unit. (these are people who are waiting for subsidized HUD units but are not considered homeless)

Because there is such a low availability rate for rentals, we are seeing more housing discrimination. We cannot prove it but we know that it is, in fact happening. It really is easy for a landlord to discriminate during this housing crisis.

Many of our consumers actually do have section 8 vouchers but are having a difficult time finding landlords who will take them. Landlords have experienced bad renters or they rent their units for more than what HUD offers in subsidies. Alison, I would presume that as the housing market improves we won't see as many homeless people but I'm not sure....this could be the new normal. I do know that Larimer County including Ft. Collins and Loveland need more affordable housing, especially HUD subsidized housing and more transitional housing. I do hope this information will help the cause-we are spending much more time with housing related issues here at Disabled Resource Services. Thank you for your concern and input-please call me if you have further questions. Sincerely, Dave McDanal, Disabled Resource Services

(Received 12/11/12)

**CITY OF LOVELAND
TRANSPORTATION ADVISORY BOARD**

Regarding the Fair Housing Action Plan

December 10, 2012

Mayor Gutierrez and Members of Council,

The City of Loveland Community Partnership Office has requested that the Transportation Advisory Board review and comment on the transportation component of the proposed Fair Housing Action Plan.

At the regular December 2012 Transportation Advisory Board meeting the TAB reviewed and voted to support the transportation portion of Section Five regarding barriers to Affordable Housing.

The Loveland community offers many wonderful amenities for its residents from employment opportunities to shopping, excellent medical care, and a wide range of recreational choices. However the ability to access all of them requires some form of reliable, predictable transportation. For the low income, elderly and disabled segments of our population alternatives to driving one's self are needed.

As the city considers the Fair Housing Action Plan and the upcoming Community Master Plan revision, the TAB recommends that the need for, and provision of, various transportation modes be integrated into those documents.

I would be glad to discuss this recommendation further at your convenience.

Best regards,

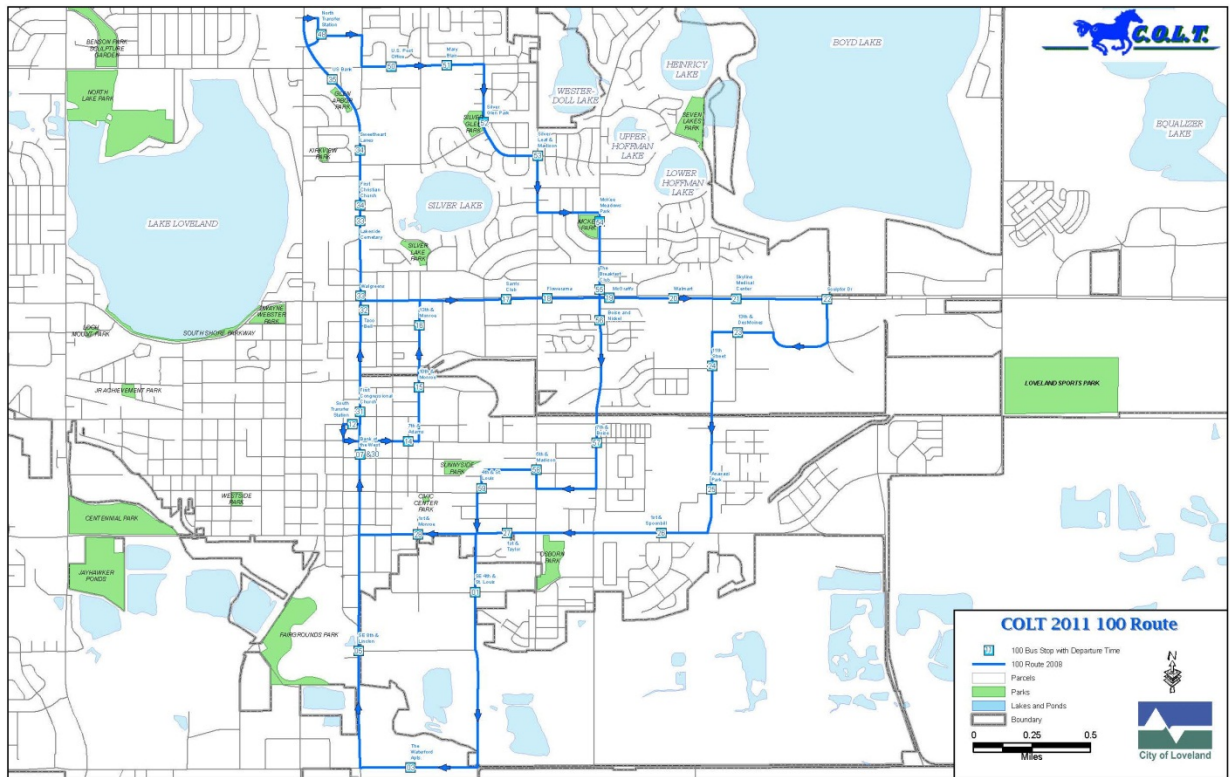


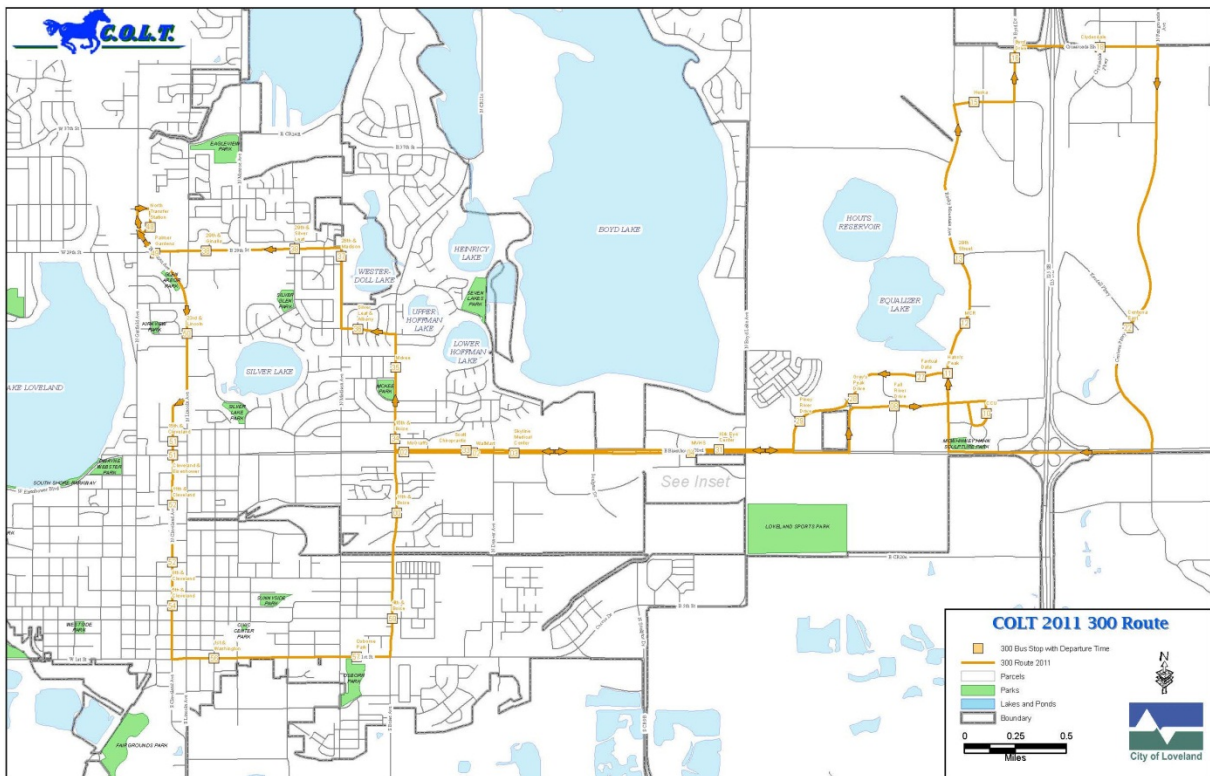
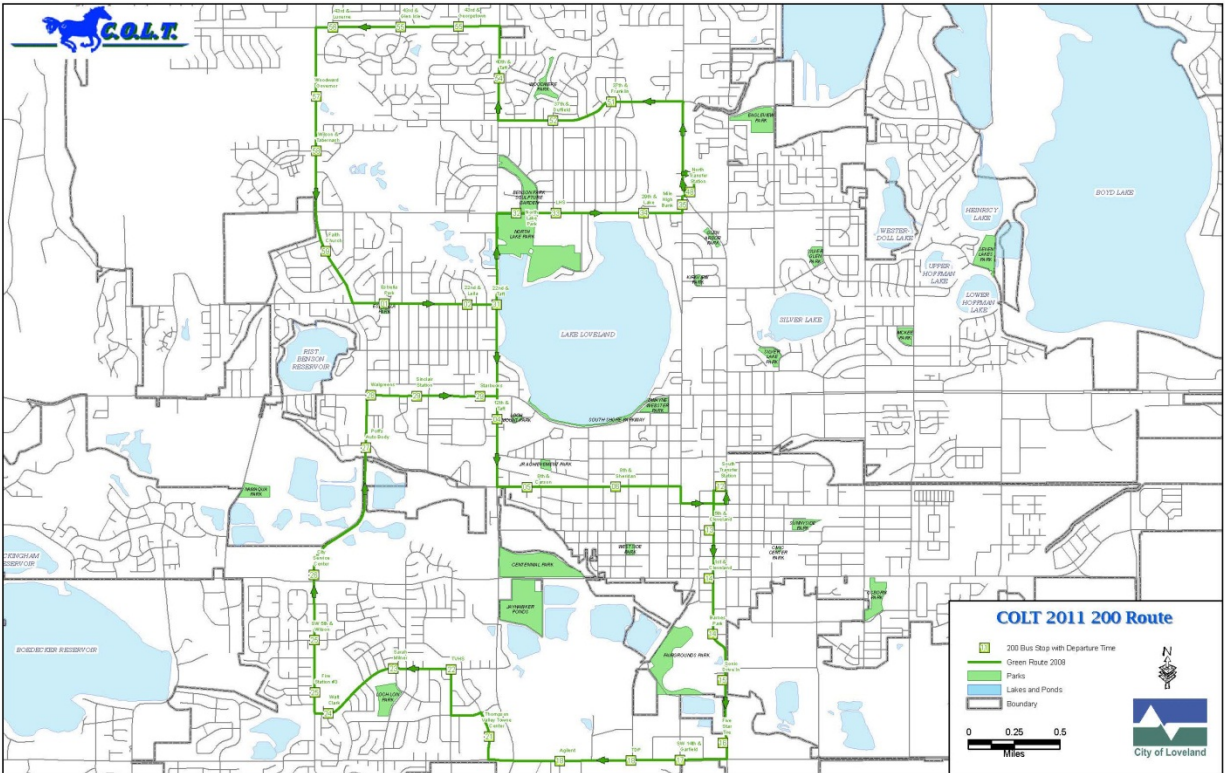
Gary D. Thomas
Chair
Transportation Advisory Board

APPENDIX C – MAP 1 Race and Origin by Census Tract

(Map to be inserted later)

APPENDIX D – MAP 2 Current Bus Routes
City of Loveland Transit – COLT 100, 200, and 300 Routes





APPENDIX E – MAP 3 Housing Authority of the City of Loveland Multi-Family Developments

(Map to be inserted later)

**APPENDIX F –
Poster of Homeless
and At Imminent Risk
of Homelessness
Count**

A LOOK AT LOVELAND'S HOMELESS

**Literally Homeless: 685
Imminent Risk of Homelessness: 516**

The following count took place in Loveland between November 1, 2011 and March 31, 2012. The numbers below are unduplicated between agencies unless otherwise noted. The school-aged children were all placed in the Thompson School District count.

NAME OF AGENCY	NUMBER OF HOMELESS SERVED, INCLUDING CHILDREN	PROGRAM DESCRIPTION
137 Homeless Connect (a program of the House of Neighborly Service)	131 Homeless Adults	137 Homeless Connect (137) shelters homeless adults during the winter when temperatures drop below 20 degrees. The program also provides the opportunity for clients to move out of their current condition through proactive case management, giving them every opportunity to seek help with substance abuse, mental illness, job search and other needs. These clients are chronically homeless.
Interfaith Hospitality Network	30 Homeless Adults 31 Homeless Children (7 of the children are school age)	Interfaith Hospitality Network (IHN) shelters homeless families with the aid of twelve local churches. In the evenings, families go to the designated host church where they share a meal with volunteers and sleep safe from the elements. During the day, clients receive case management and mentoring.
Catholic Charities of Larimer County	9 Homeless Adults 1 Homeless Child	Catholic Charities (CCLC) manages a homeless shelter and supportive services for men, women and families, interim housing for veterans, community meals, emergency assistance and case management for low-income seniors. Most of these clients are chronically homeless.
Thompson School District	366 Homeless School Age Children	The Department of Education includes as homeless any youth without a permanent residence. School-age children are considered literally homeless if they meet this definition.
Alternatives to Violence	21 Homeless Adults 26 Homeless Children (all are school aged children)	Alternatives to Violence (ATV) offers emergency motel stays to victims displaced from their homes and refers to area safe houses for short-term housing. The agency also provides housing as a long-term solution to keep victims of domestic violence feeling like they need to return to their abusive partner to keep from sleeping on the streets. Victims of domestic violence are considered homeless if they are fleeing an abusive partner.
Crossroads Safehouse	15 Homeless Adults 8 Children	Crossroads Safehouse (CS) offers 32 bedrooms that sleep up to 104 survivors of domestic violence and their children, including women and men. CS also provides free legal representation for obtaining restraining orders, child custody issues, divorce and other related family law issues from CS attorneys. The 8 children would likely not be attending Loveland schools but are not counted in the literally homeless count above. There may be a duplication of 11 adults with ATV; that number has been subtracted from the total.
House of Neighborly Service	64 Homeless Adults 61 Children (45 school aged children)	House of Neighborly Service (HNS) is a comprehensive resource agency that provides food, clothing, emergency shelter, prescription and medical assistance, back-to-school assistance, help with a utility bill, transportation, screenings for City of Loveland financial assistance programs, financial education, and childcare for all in house education programs. Caseworkers meet individually with each client as they are guided through referrals, recommendations to other programs, and scheduling of educational classes to increase success and promote families to self-sufficiency.
Housing Authority of the City of Loveland (HACOL)	432 Self-Declared Homeless Adults Adults at Risk of Homelessness	Because these clients are self-declared as homeless, it is not currently feasible to determine their exact status. Therefore, these clients are placed in the Imminent risk of homelessness category. These 432 clients are not duplicated above.

DEFINITIONS:

Chronically Homeless Adults – A single unaccompanied individual without a permanent residence for a year or more, or has had at least four episodes of homelessness in the past three years. Families are not considered "chronically homeless" because children of chronically homeless adults will likely be removed from the family and put in foster care. (137, CCLC)

Episodically Homeless Adults – Occurs when a loss of income leads to a housing crisis or as a result of domestic violence. According to the U.S. Department of Housing and Urban Development, an adult who sleeps in a home, even if that home may not be available tomorrow, is not considered homeless. Those people who may not have a home tomorrow are counted above as homeless. (IHN, ATV, CS, HNS)

Literally Homeless – Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation
- Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregative shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs)
- Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Thompson School District Students – According to the U.S. Department of Education, the term homeless children and youth means individuals who lack a fixed, regular, and adequate nighttime residence.

This definition also includes:

- Children and youth who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason
- Children who may be living in motels, hotels, trailer parks, shelters, or awaiting foster care placement
- Children and youth who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings
- Children and youth who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings, or
- Migratory children who qualify as homeless because they are children who are living in similar circumstances listed above

Victims of Domestic Violence – Loveland residents who have left their abusive partner and are living in transitional housing, or who have stayed at a local shelter or hotel in order to remove themselves from the violence.

Imminent Risk of Homelessness – An individual or family without a regular place to sleep each night, or with an income that is so tenuous he or she may not be able to pay rent next month. (HNS, HACOL)

APPENDIX G – MAPS 4 Parks, Open Lands, and Trail System

(Map to be inserted later)

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AFFIDAVIT OF PUBLICATION

REPORTER-HERALD

State of Colorado
County of Larimer

I, the undersigned agent, do solemnly swear that the LOVELAND REPORTER-HERALD is a daily newspaper printed, in whole or in part, and published in the City of Loveland, County of Larimer, State of Colorado, and which has general circulation therein and in parts of Larimer and Weld counties; that said newspaper has been continuously and uninterruptedly published for a period of more than six months next prior to the first publication of the annexed legal notice of advertisement, that said newspaper has been admitted to the United States mails as second-class matter under the provisions of the Act of March 3, 1879, or any, amendments thereof, and that said newspaper is a daily newspaper duly qualified for publishing legal notices and advertisements within the meaning of the laws of the State of Colorado; that a copy of each number of said newspaper, in which said notice of advertisement was published, was transmitted by mail or carrier to each of the subscribers of said newspaper, according to the accustomed mode of business in this office.

The annexed legal notice or advertisement was published in the regular and entire edition of said daily newspaper once; and that one publication of said notice was in the issue of said newspaper dated November 22, 2012.

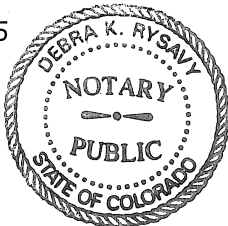
Beta Warner Ward

Agent

Subscribed and sworn to before me this 20th day of December, 2012 in the County of Larimer, State of Colorado.

Debra K. Rysavy
Notary Public

Fee \$21.45
Account #222255
Ad #5573800



MY COMMISSION EXPIRES
APRIL 30, 2013

TO ALL LOVELAND CITIZENS AND INTERESTED PARTIES: NOTICE OF PUBLIC HEARING & AVAILABILITY OF DOCUMENT FOR REVIEW

The City of Loveland has completed an *Analysis of Impediments to Fair Housing Choice* as a requirement of the U.S. Department of Housing and Urban Development. A public hearing on the *Analysis of Impediments to Fair Housing Choice* will be held on Tuesday, December 18, 2012 at 6:30 p.m. in the Loveland City Council Chambers located at 500 East Third Street. If special accommodations are necessary, please call (970) 962-2517 and ask for assistance.

The report is available to the public for examination from November 22, 2012 through December 21, 2012 at the City of Loveland Community Partnership Office, 500 E. Third Street, and the City of Loveland Public Library, 300 N. Adams. An electronic copy can be found on the City of Loveland Community Partnership website at: www.cityofloveland.org/communitypartnership. Any comments or questions regarding the report should be directed in writing to the City of Loveland Community Partnership Office, 500 E. Third Street, Loveland, Colorado 80537, by calling (970) 962-2517 between 9:00 a.m. and 5:00 p.m., Monday - Friday, or via e-mail at alison.hade@cityofloveland.org.

Parts of the report will be made available in Spanish or large print upon request.

Published: Loveland Reporter-Herald on Nov. 22, 2012. Ad #5573800