

Assessment of Fair Housing 2018



Community Partnership Office

500 E. Third St, Suite 210; Loveland, CO 80537

970-962-2517

Assessment of Fair Housing Tool for Local Governments

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I. Cover Sheet

1. Submission date: May 15, 2018
2. Submitter name: City of Loveland Community Partnership Office
3. Type of submission (*e.g.*, single program participant, joint submission): Single Program
4. Type of program participant(s) (*e.g.*, consolidated plan participant, PHA): Consolidated Plan participant
5. For PHAs, Jurisdiction in which the program participant is located: N/A
6. Submitter members (if applicable): N/A
7. Sole or lead submitter contact information:
 - a. Name: Alison Hade
 - b. Title: Administrator
 - c. Department: City of Loveland, Community Partnership Office
 - d. Street address: 500 E. Third Street, Suite 210
 - e. City: Loveland
 - f. State: Colorado
 - g. Zip code: 80537
8. Period covered by this assessment: 2017 - 2020
9. Initial, amended, or renewal AFH: Initial/Interim
10. To the best of its knowledge and belief, the statements and information contained herein are true, accurate, and complete and the program participant has developed this AFH in compliance with the requirements of 24 C.F.R. §§ 5.150-5.180 or comparable replacement regulations of the Department of Housing and Urban Development;
11. The program participant will take meaningful actions to further the goals identified in its AFH conducted in accordance with the requirements in §§ 5.150 through 5.180 and 24 C.F.R. §§ 91.225(a)(1), 91.325(a)(1), 91.425(a)(1), 570.487(b)(1), 570.601, 903.7(o), and 903.15(d), as applicable.

II. Executive Summary

This report is an update to the City of Loveland's Analysis of Impediments to Fair Housing Choice (AI) using the format of the Assessment of Fair Housing (AFH). Information in this report came from HUD provided tables and maps, conversations with community non-profit leaders, community members, city and school district staff and a survey that was developed for a larger purpose but only distributed at one event to 28 residents. This interim process and report will be used to inform the full AFH that is currently due to be submitted to the Office of Fair Housing in January 2020. The process that will be used for that report is described below.

While City of Loveland residents experience many barriers to housing, information during the process did not point directly to discrimination, but to a lack of affordable or accessible housing, or to a lack of job opportunity nearby. These results are not stated to assume that discrimination does not exist, but that the City of Loveland Community Partnership Office does not currently know how to determine if it exists or not (CPO). Extensive data provided by HUD will help the CPO determine where to seek community input to better understand housing patterns, either intentional or not. The community data will also inform better or other questions to hopefully lead to projects or programs that create opportunity for residents who believe they live in an area with none.

The Community Partnership Office made some progress in the 5-year goals of the 2012-2017 AI. Some of the goals will continue as described at the bottom of page 7. New goals can be found on page 40.

III. Community Participation Process

1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board and other resident outreach.

The City of Loveland Community Partnership Office used two primary strategies to solicit information and community input for the AFH process. First, a 54-question survey was crafted for residents of Loveland to complete. Surveys were available in both Spanish and English. The survey gathered information on respondents' current living situation, perceptions of safety, experiences with displacement, experiences of discrimination, experiences with bringing forth fair housing complaints, and basic demographics. The survey was disseminated at the Library Block Party on June 21, 2017, yielding 28 completed surveys (all completed in English. One Spanish survey was given but the respondent did not return it.).

Second, targeted community members, agency leaders, and City staff provided feedback for sections relevant to their areas of expertise. Those stakeholders interviewed for this iteration of the AFH include the Loveland Housing Authority, Disability Resource Services, a Thompson School District board and staff member, and members of the City of Loveland staff working on infrastructure, transportation, and housing issues. This strategy provided enough initial information to generally gauge the City's progress and areas for continued improvement related to fair housing issues.

For future iterations of the AFH process, the City of Loveland intends to use the following process to modify the AFH community survey:

1. Review findings from the 2017-2018 AFH process to determine where the community survey, in its current 54-question form, did not yield accurate or reliable data. Edit the survey to include only those questions proving useful for drafting the AFH plan and the associated fair housing strategies for Loveland.
2. Submit for additional comments and edits to the Human Services Commission, Affordable Housing Commission, Disability Advisory Commission, Transportation Advisory Board, and Senior Advisory Board. With all edits incorporated, resubmit to the Affordable Housing Commission for final approval. Inform Loveland City Council of plans for dissemination.
3. Distribute a link to the final survey, mailed in a utility bill with an explanation of the purpose of the survey, to all households in Loveland. Provide paper copies or a link to the online survey through other targeted community partners to ensure those households who may not have received a utility bill (e.g., those experiencing homelessness or those living in affordable properties with utilities included with rent) have an opportunity to complete the survey. Efforts will be made to ensure residents do not complete the survey multiple times. However, given the traditionally low response rates of surveys, it is expected that any duplicate surveys would be few enough in number as to not skew survey results. Surveys will be disseminated in both English and Spanish.

In addition to the community survey, efforts will be taken to gather targeted information from local non-profit organizations and other relevant stakeholders as follows:

- Engage parents of students enrolled in the Thompson School District through a school-based meeting, specifically targeting those schools with the highest free and reduced lunch rates.
- Engage staff at local non-profit service providers through the Community Resource Connection, a regular meeting of key service providers in Loveland working with low-income individuals and families.
- Through the Loveland Housing Authority (LHA), disseminate surveys to all residents living in LHA properties or receiving assistance with an LHA-administered housing voucher. Follow-up with LHA residents will occur through the LHA advisory board, providing the City of Loveland an opportunity to ask more focused follow-up questions of the board based on residents' survey responses.
- Engage members of community churches or community groups, specifically those churches in neighborhoods with significant changes in race/ethnicity or poverty.

2. Provide a list of organizations consulted during the community participation process,
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For this iteration of the AFH process, the following organizations were consulted as part of the community participation process:

- Loveland Housing Authority
- Disability Resource Services
- Neighbor to Neighbor
- Easter Seals
- Thompson School District

- City of Loveland Planning Department
- City of Loveland Parks and Recreation Department
- City of Loveland Public Works
- Thompson School District

3. How successful were the efforts at eliciting meaningful community participation? If there was low participation, provide the reasons.

For this iteration of the AFH process, a total of 28 paper surveys were collected in 1.5 hours from local Loveland residents.

All individuals at community organizations who were consulted willingly answered questions related to the AFH.

Low participation was due to the City of Loveland's intention for this iteration of the AFH process, namely to refine the process and gain a sense of the City's current status with affirmatively furthering fair housing. Future iterations of the AFH will intentionally and strategically engage larger groups of stakeholders to ensure broad and meaningful participation across the community.

4. Summarize all comments obtained in the community participation process. Include a summary of any comments or views not accepted and the reasons why.

Housing affordability is a persistent and increasingly problematic issue facing residents of Loveland. Of the 28 respondents to the community survey, 58% noted they chose their current residence or neighborhood because of its relative affordability. Affordability was the single most frequently cited reason provided by respondents for why they chose their current residence. While this was a primary reason cited in individuals' choices in housing, almost 40% of respondents also rated the availability of quality affordable housing in their neighborhood as poor or fair. In addition, almost 45% of respondents rated access to public transportation in their neighborhood as poor or fair.

A minority of respondents are concerned with needing to move from their current residence. For those with this concern, increasing rent and a lack of job opportunities nearby were the two most frequently cited reasons people may lose their housing.

A handful of respondents also reported having trouble finding safe, quality, and affordable housing (for their income level) in a neighborhood in which they would want to live. Over one-fifth of respondents chose to write in other reasons they had trouble finding acceptable housing, all citing affordability or a lack of income as their primary reason for not being able to find housing. Religion, having children, having previous evictions, and marital status were all cited by at least one respondent as reasons they had trouble finding acceptable housing. In total, around 35% of respondents felt they had been discriminated against by a landlord, and none of the respondents who had been discriminated against had complained or raised these issues with the landlord or other entities who may have been able to assist.

Individual conversations with service providers, non-profit organizations, and other City departments yielded similar findings. Overall, people working and living in Loveland recognize that affordability of housing is a key issue facing Loveland residents, specifically those with lower incomes. Lack of access to sustainable wages and reliable public transportation further impede residents' abilities to live safely and securely in Loveland. Given that lower incomes are often

correlated with characteristics like race or ethnicity, City staff and partnering agencies are committed to recognizing and working to correct disparities in access or opportunity existing for Loveland residents.

IV. Assessment of Past Goals, Actions and Strategies

1. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents:

The 2012 Analysis of Impediments to Fair Housing Choice included a 5-year plan to address housing discrimination, language and culture, marketing to residents least likely to apply for housing and services, and affordable and transitional housing. Several goals were accomplished during the five years and some were not. Overall, the Community Partnership Office worked to open communication with residents to help them understand that if they experienced discrimination, they could get help.

a. Discuss what progress has been made toward their achievement.

HOUSING DISCRIMINATION

- The Community Partnership Office (CPO) distributed fair housing posters to City funded non-profits that provide housing and some that only provide services. All posters have a large sticker that gives additional contact information in English and Spanish for the CPO and the Colorado Civil Rights Division. The CPO will continue to place as many posters as possible throughout the city.
- Each year, City Council celebrates Martin Luther King Jr in January and Fair Housing month in April with proclamations that celebrate the civil rights movement and the Fair Housing Act of 1968. The CPO will continue to advertise Fair Housing month in our City News newsletter that is mailed to 37,500 addresses. The ad provides the phone number of the CPO to offer help with housing discrimination.
- The CPO intended to produce Fair Housing brochures, preferably with the help of non-profit housing providers and the Loveland/Berthoud Association of Realtors to be distributed to local landlords. This item will be continued.
- Surveys were distributed throughout 2015 to ask for community input for the 2015-2019 Consolidated Plan and the City of Loveland 10-year Comprehensive Plan. Questions included perception of most common housing problems, affordable rental and ownership housing needs, housing needs for persons with disabilities, homeless housing needs, and community development and public service needs. Questions were designed to lead to the allocation goals of the Affordable Housing Commission and not directly to Fair Housing efforts. **The City of Loveland does not currently allocate CDBG funding specifically to desegregate neighborhoods or for place-based investing.** Surveys for the Assessment of Fair Housing or the Consolidated Plan processes will likely be the only request for housing or discrimination information on a regular basis moving forward.
- The CPO works with community partners to ensure equal access. Disabled Resource Services helps their customers with a 504 request and will advocate if necessary. The CPO provides financial and other support for Disabled Resource Services.

- The CPO does not know how to monitor mortgage rate denials based on race/ethnicity and will request technical assistance from HUD in the future.

LANGUAGE AND CULTURE

- The City of Loveland has a Limited English Proficiency (LEP) plan and is now working with City funded non-profits to ensure they do as well. All plans will include the translation of vital documents and certified translators or access to a translation company. The CPO developed a checklist that was given to agencies and will follow-up with technical assistance and monitoring. This process has taken far longer than anticipated.
- “I Speak” cards have been distributed to all City funded agencies and are available to any community partner upon request.

MARKETING TO LEAST LIKELY TO APPLY

- The CPO monitors agencies to understand the degree to which the demographic make-up of their customers matches the demographic make-up of the community to ensure equal benefit to protected classes. Technical assistance is available for agencies that do not market their services to a cross section of Loveland residents.
- The CPO will work with the Loveland Housing Authority to better understand the degree to which their residents may contribute to increases in the number of minorities in specific neighborhoods by matching specific property demographic information with Loveland demographic information. Future AFH citizen participation will include asking residents where they receive information to support the Housing Authority’s effort to market to a cross section of area residents.

AFFORDABLE HOUSING

- The CPO directs Community Development Block Grant funding to organizations that submit proposals that match the goals of the 2015-2019 Consolidated Plan: 1) new single-family or multi-family housing or housing for homeless residents, 2) rehabilitation of single-family or multi-family housing, 3) public facilities. The CPO knows that new multi-family housing must include units already accessible for persons with mobility impairments.
- To receive a financial incentive for new housing, a developer/builder completes an application that includes questions about proximity to food and transportation. The Affordable Housing Commission makes incentive decisions based on answers to these questions and housing placement that makes sense for the occupants and not just for the developer.
- The CPO has been actively working on housing and services for people experiencing homelessness and has lead and joined committees working on permanent supportive housing. Regionally, 225 veterans, 50 non-veteran adults, and 10 families are no longer homeless because of this work. Loveland will receive nine additional housing vouchers for homeless youth and has started working on a project to build (up to) 400 square foot homes through Loveland High’s Geometry in Construction class (<http://www.geometryinconstruction.org/resources/MEDIA/press/LovelandConstructionGeometryInnovationProfileFINAL.pdf>).

- During the 5-years of the Analysis of Impediments to Fair Housing Choice, the Loveland Disabilities Advisory Commission made reports of businesses and public housing that is not accessible. These actions were discontinued a few years ago. The CPO will work with the staff liaison to this commission to see if the members can offer support for community wide accessibility. The Disabilities Advisory Commission works to educate other Boards/Commission members.
- All Boards and Commissions provide information to the public about meeting accessibility. The City has assistive listening devices on hand and 24-hour sign language service as requested. A sight impaired Human Services Commission member from 10/2011 until 06/2014 made a few changes to the way in which those meetings were conducted, including having all printed material in large print on a regular basis, which increased awareness about accessibility.
- Advertisements from the CPO for public hearings or viewing documents are submitted in English and Spanish.
- Source of income discrimination likely exists in Loveland as it does in other communities. The CPO is not currently planning on addressing this issue.

BARRIERS TO AFFORDABLE HOUSING

- **LAND DEVELOPMENT COSTS, DEVELOPMENT FEES, AND SOME DEVELOPMENT STANDARDS.** The City of Loveland is expecting to approve Loveland's new planning and zoning code this year. The project "combines the City's Subdivision, Annexation and Zoning codes into a Unified Development Code" that simplifies the development application process and allows more options available for building homes on significantly smaller lots. It also minimizes the cost to applicants by allowing discretionary approvals prior to requiring public improvement construction drawings. These changes may help Loveland build more affordable housing, which will benefit all residents, especially those residents living below 80% of the area median income. For more information: <http://www.cityofloveland.org/departments/development-code-update>.
- **NIMBY SYNDROME.** Loveland experiences NIMBYism like any other community. Recent development proposals have received objections from residents wishing to keep their rural views rural, objecting to increased traffic and density, and questioning how new development will affect property values. Some residents objected to less desirable \$500K-\$700K homes in their neighborhood. In 2014, a development proposal included citizen participation voicing concerns about low-income housing, or "those people", moving into their neighborhood. Throughout that process, the CPO monitored whether there was a potential Fair Housing violation and contacted the Denver Office of Fair Housing for support. The multi-family rental housing was not built.
- **FORECLOSURES, CREDIT HISTORY, AND INCOME.** The City of Loveland funds programs that provide assistance to consumers with financial issues, including case management for foreclosure prevention, mortgage counseling, and rental counseling provided by Neighbor to Neighbor, and financial and budgeting classes provided by House of Neighborly Service. These programs will continue in Loveland and hopefully others will be added.
- **LACK OF EMERGENCY AND TRANSITIONAL HOUSING FOR HOMELESS FAMILIES AND INDIVIDUALS.** The CPO has been actively working to provide awareness of the need for emergency and longer-term housing for homeless residents, as well as working to

secure additional local resources. Over the last five years, the CPO has been able to access millions of dollars of support in fee waivers and other incentives for housing and public facilities.

- TRANSPORTATION/Public Works has been actively working on increasing transportation options for all residents in need and has begun offering commuter transportation along Highway 34, connecting the west and east sides of Loveland to better assist workers that rely on public transportation for employment. More information about recent accomplishments can be found at <http://www.ci.loveland.co.us/departments/public-works>.

b. Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences).

LEP Plans for City of Loveland grant recipients has taken longer to implement than initially anticipated and is not yet complete. The City continues to make progress and participating organizations are aware of their responsibility to communicate with and provide access to services for individuals with limited English proficiency, but the City has not yet been able to determine if every organization has incorporated these practices into written organizational documents and plans.

Generally, the City of Loveland has opportunities to make greater progress on fair housing goals by continuing to closely monitor the status of fair housing issues in the community, work closely with affected communities so they know the process of reporting grievances and understand their rights as community members, and create processes in the City to respond quickly and effectively to address or create a plan to address emerging issues.

c. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

Community members may not be familiar with their rights as renters and homeowners as well as how to report violations of their rights to the appropriate party. In addition, the City of Loveland recognizes that some may feel that reporting a grievance to the City or another entity could jeopardize their housing, particularly if they are renting and have limited income, thereby reducing the number of alternative housing options. To ensure fair housing laws and practices are followed, the City of Loveland must better communicate with local residents, informing them of their rights, assuring them that raising fair housing issues should not affect their housing and closely monitoring the results of fair housing grievances to ensure individuals are not punished for bringing forth issues.

In addition, the City of Loveland needs to continue to work with organizations to ensure those working with community members have a full understanding of their obligations under the ADA, Title VI, and other Fair Housing laws, and have established guidelines and policies in place to ensure these federal laws are upheld.

d. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

Many of the current goals will continue, such as proclamations for Martin Luther King Jr day and Fair Housing month, and sending information to all residents at least once a year. The CPO will continue to work with funded agencies to ensure they have adequate Title VI and ADA plans so all customers can gain equal service. The CPO will also continue to monitor whether the clients of funded agencies reflects the community as a whole.

V. Fair Housing Analysis

[Note to Public: Where HUD has not provided data for a specific question and program participants do not have local knowledge or local data that is relevant to answering the question and as otherwise outlined in 24 C.F.R. § 5.152, participants may note the lack of such available information. Program participants should not leave the response blank.]

A. Demographic Summary

1. Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).

Based on data provided in Table 2, while Loveland is still a majority white community, the proportion of white residents has declined, and racial and ethnic minorities have increased in the raw number and proportion of residents. Overall, the white population has seen a seven percentage point decrease in population since 1990.

Although still representing less than one percent of the population, the black/African American population has more than doubled in size (proportional to the total population), from .22% of the total population in 1990 to .52% of the population today. Those identifying as Asian or Pacific Islander have also doubled in size proportional to the overall population, from .66% in 1990 to 1.1% of the total population today. Individuals identifying as Hispanic have also increased both in the number of individuals residing in Loveland and in the proportion of the total population. In 1990, 6.56% of Loveland's population identified as Hispanic. In 2010, 11.70% of the population identified as Hispanic, an increase of over five percentage points.

Loveland's Native American/American Indian population has fluctuated dramatically since 1990. In 1990, the Native American population represented .4% of the total population in Loveland; today, the Native American population represents .49% of the total population. However, the Native American population doubled from 1990 to 2000 and continued to increase slightly up until 2010. After 2010, the Native American population rapidly declined, halving itself from 2010 to 2017. The City of Loveland contacted the Northern Colorado Intertribal Powwow Association, the Denver Indian Center, and the Center for Native American and Indigenous Studies at CU Boulder to attempt to gain a better understanding of this trend and reasons for this sudden and dramatic population decline, but were unable to contact anyone with knowledge of these population trends.

The percent of those residents identifying as foreign-born has almost tripled from 1990, increasing from 1.59% of Loveland's population in 1990 to 4.74% of Loveland's population today. In addition, there are twice as many individuals with limited English proficiency today as compared to 1990 (3.07% as compared to 1.46%).

For other demographic categories, including ages, genders, and family composition, the population of Loveland has remained fairly steady since 1990.

2. Describe the location of homeowners and renters in the jurisdiction and region, and describe trends over time.

According to data from the U.S. Census Bureau, the City of Loveland has witnessed a marginal increase in the number of homeowners from 2009 to 2015 (from 18,112 homeowners in 2009 to 18,697 homeowners today). The increase in Loveland's overall population has come from a renter

population. Overall, the number of renters in Loveland has increased by 53% from 2009 to 2015 (from 7,388 renters in 2009 to 11,288 renters in 2015).

Renters are primarily concentrated in the center of Loveland, south of Lake Loveland and primarily west of Highway 287 concentrated in the center of town, and south to Hwy 402. The census tract with the highest concentration of renters is 002007, covering most of the downtown region and extending southwest, in which 72% of residents are renters.

B. General Issues

i. Segregation/Integration

1. Analysis

a. Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.

There are several census tracts within Loveland in which Latino and/or Hispanic families appear concentrated (based on Map 1, set with a dot ratio of 1:1). Given the higher numbers of Hispanic and Latino individuals, as compared to other racial and ethnic minorities, this perception may be due to the ease at which these trends can be visualized given the population numbers. Other racial and ethnic minorities, which are fewer in numbers, appear to be more evenly spread throughout Loveland.

Within Loveland, there are census tracts with greater levels of segregation, particularly for Hispanic and/or Latino residents. Based on information from Map 12, some of the census tracts with greatest Hispanic population are also in those tracts with the greatest prevalence of poverty; other tracts with lower low poverty indices have a higher concentration of white, non-Hispanic individuals. Given these findings, there does not appear to be an overarching correlation between race or ethnicity and poverty in the City of Loveland.

Those areas that do present a higher concentration of poverty and higher concentrations of minority populations, specifically for Hispanic households (and based on data provided in Map 12), are in the following areas: the southeast quadrant of Loveland, south of Lake Loveland, and northeast Loveland.

The resident survey disseminated as part of the AFH process asks residents what were the most important reasons they selected the neighborhood in which they live. One possible response is “No Choice.” In future iterations of Loveland’s Fair Housing Plan, staff intends to follow up with residents who respond to Question 5 with “No Choice” to better understand why they feel they had no other options of neighborhoods in Loveland in which to live.

b. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

According to data provided in Map 4.1, among those residents who were born in foreign countries, there is a concentration of foreign-born residents from Mexico in one census tract located in the southwest quadrant of the City. For residents with limited English proficiency, most prefer

communicating in Spanish, and these Spanish-speaking residents are concentrated in one area located in Southwest Loveland. This neighborhood is also home to Thompson Valley High School, a Loveland high school with approximately 1200 enrolled students, of which over 19% identify as Latino or Hispanic. In addition to this area of primarily Spanish-speaking residents, one neighborhood in northeast Loveland is home to a higher concentration of Vietnamese-speaking residents. While the higher concentration is noticeable, the total number of Vietnamese-speaking individuals is still low in comparison with the total population, with only 65 LEP residents speaking Vietnamese.

c. Explain how these segregation levels and patterns in the jurisdiction and region have changed over time (since 1990).

In 1990, the population was fairly well-dispersed, with no noticeable concentrations of residents based on race or ethnicity. By 2010, there are eight noticeable pockets of residents identifying as Hispanic or Latino throughout Loveland. There are no other noticeable concentrations of any races, based on the 2010 data provided from Map 1.

d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas.

Based on data informing Map 16, the census tract with the highest concentration of renters was not one of the areas with the highest concentration of minorities. However, the second highest census tract of renters, in which renters comprise 50% of all residents, does include one of the eight pockets of Hispanic or Latino resident concentrations.

The census tract with the high concentration of Vietnamese-speaking residents also has a high number of homeowners, with 72% of residents living in owner-occupied units (totaling over 1400 homeowners in the tract).

With additional data collected from residents in future iterations of the AFH process, the City of Loveland will examine correlations between residents' race or specified neighborhood with their experiences with looking for a new place to live (and whether they could find safe, quality, affordable housing during that process), perceptions of discrimination in the housing search process, complications with applying for a mortgage or other home-financing issues, and perceptions of discrimination in the home financing process. These data will assist City staff in identifying underlying factors facing minority households that may contribute to segregation or integration in city limits.

e. Discuss whether there are any demographic trends, policies, or practices that could lead to higher segregation in the jurisdiction in the future. Participants should focus on patterns that affect the jurisdiction and region rather than creating an inventory of local laws, policies, or practices.

Loveland is expected to continue to see pronounced population growth over the coming decades, largely due to in-migration. In addition, Loveland is an aging community with rising housing costs. As the community ages and a higher proportion of residents are living on a fixed income in their retirement years, the City of Loveland is prepared to monitor whether individuals who choose to remain living here and age in place are able to do so, and if this demographic trend results in a concentration of older residents in more affordable census tracts.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

Other data available to City of Loveland staff as well as anecdotal reports from contributing agencies do not indicate there are other issues of segregation among other protected groups within the City of Loveland geographic boundaries.

b. The program participant may also describe other information relevant to its assessment of segregation, including activities such as place-based investments and mobility options for protected class groups.

Loveland currently opts to provide place-based investments on a house-by-house, rather than a neighborhood, basis. The Larimer Home Improvement Program (LHIP) provides funds for health and safety home modifications to homeowners in Larimer County. In Loveland, LHIP grants and loans are administered by the Loveland Housing Authority and are available to qualifying residents with incomes at 80% area median income or less. These LHIP grants and loans serve to preserve housing for low-income residents in the county and ensure that low- and moderate-income residents have safe and healthy homes in which to live. The program provides a secondary purpose of facilitating a sense of pride in one's home and neighborhood. For Loveland's 2020 AFH submission, the City of Loveland will attempt to use GIS to map current investments from LHIP to determine if the funds provided are dispersed proportional to the neighborhoods with higher concentrations of low-income households.

LHIP also ensures the entitlement jurisdictions in Larimer County remain in compliance with municipalities' Consolidated Plans. Program guidelines and an application for a LHIP loan are available on the Loveland Housing Authority's website, although all information, including the application, is in English, establishing an additional barrier for those with limited English proficiency to access assistance. The Housing Authority is currently in the process of getting their vital documents translated and will put applications on their website once this has been accomplished.

A lack of well-maintained sidewalks and curbs can also impede individuals' with disabilities ability to remain mobile and have equitable access to public and private amenities. In 2017 – 2018, the City of Loveland is undertaking an effort to develop and improve sidewalks in identified areas. The City identified a total of 17 major gaps in connectivity. Eight areas were prioritized for completing construction in 2018 to address these connectivity gaps. The City prioritized arterial sidewalks over collector (lower-volume) sidewalks as these larger arterial roads are more difficult for bicycles and individuals with mobility impairments to cross safely without appropriate sidewalks and curb cuts in place.

The City of Loveland's Parks and Recreation Department utilizes GIS data to evaluate the distance people across the city must travel to a recreation opportunity. This enables the Department to regularly assess whether investments in parks and other recreation locations are concentrated in specific neighborhoods within Loveland.

To assist with the costs of transportation, the CPO disseminates City of Loveland Transportation (COLT) bus passes to partnering non-profit organizations serving low-income and homeless

residents. In CY 2017, the CPO distributed almost 5,000 single-ride bus passes through this process. Agencies partnering with the CPO to disseminate bus passes include the following:

Alternatives to Violence
Disabled Resource Services
House of Neighborly Service: Angel House, 137 Connection and general programs
Larimer County Workforce Center
Loveland Community Health Center – Sunrise Community Health
Loveland Housing Authority: The Edge veteran housing program
Loveland Visitors Center
Salvation Army
SummitStone Health Partners
Work Life Partnership

In addition, the CPO distributes bus passes to appropriate residents out of their office and at the Loveland Connect event held each fall.

While these bus passes assist with the transportation costs for low-income households, it does not correct for the lack of connectivity and accessibility of public transportation throughout the city. When asked to rate certain characteristics of their neighborhoods, over 44% of residents surveyed rated their access to public transportation as poor or fair. Just over 37% of residents surveyed rated it excellent or very good. In addition, when commenting on the ease with which they can access different public and private amenities in the community, most noted that such access is easy with a car, but difficult on foot or by bus.

3. Contributing Factors of Segregation

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

- Community opposition – Community opposition impacting segregation often comes in the form of opposing new affordable housing developments in Loveland. These developments are sometimes met with opposition from surrounding neighbors with comments about concerns for property values and safety, or impeding views of the mountains. National and local data indicate that property value and safety concerns are unfounded, but local residents still voice their opposition to City staff and their City Council representatives. The occasional community opposition that arises when a new project is proposed has not impeded the development of any new affordable housing in Loveland in the past three to four years.
- Displacement of residents due to economic pressures – Loveland fared far better than many communities during the economic downturn, with minimal and reasonable impact to the local economy and job market. Still, the City of Loveland and community partners have anecdotal evidence that the economic downturn impacted and continues to impact those households with the lowest incomes, with some residents reporting they entered homelessness because of loss of income or rising rents following the housing crisis. Neighbor to Neighbor, an affordable housing and rental assistance provider in Larimer County, noted that clients who went through an eviction during the economic downturn most commonly ended up in rental housing or staying with family for a period. It is not known what percentage of residents who lost their housing have been able to return to home ownership. Despite these general trends, there is no indication that displacement of residents due to economic pressures is a pronounced issue within Loveland.

- Lack of community revitalization strategies – Loveland has and is currently implementing a revitalization strategy for the downtown area that is expected to address some issues with building quality and vacancies and bring greater economic activity into the downtown area. No other neighborhoods or areas of the city have designated revitalization strategies, and City Council, City Staff, and other stakeholders have not identified a need for widespread revitalization strategies in neighborhoods outside of the downtown core. However, individual residents or community groups have historically brought issues related to public infrastructure or community needs (such as enhancing small sections of roads or sidewalks in specific areas) to City Council, which have driven investments in those areas.
- Lack of private investments in specific neighborhoods – The most noticeable lack of private investment in Loveland occurs in the downtown area, where vacant storefronts and aging buildings are a concern. With a focused revitalization strategy for the downtown core, City, County, and private partners have identified opportunities and incentives to increase private investments flowing into this neighborhood. As a large portion of the residents in downtown are renters, City of Loveland staff are monitoring changes in housing accessibility and attainability that may result from the increasing investments in downtown to better proactively address the needs of lower income households and renter households in the community. Residents throughout the city report adequate access to private services and amenities. Almost 93% of respondents to the fair housing survey reported having easy or somewhat easy access to grocery stores, 93% of respondents also reported having easy or somewhat easy access to pharmacies, and 100% of respondents reported having easy or somewhat easy access to banks or credit unions. With a larger number of Loveland residents surveyed in future AFH planning processes, the City of Loveland can better determine if residents across all neighborhoods still find access to private services as easy as those surveyed in this initial effort.
- Lack of public investments in specific neighborhoods, including services or amenities – The City of Loveland provides access to basic infrastructure such as water, power, garbage collection, and road and sidewalk maintenance, and builds and maintains parks throughout the city. Other City funded amenities are currently only located in the downtown area, including the public library, museum, recreation center, and theatre. Among the 28 respondents to the City’s survey on fair housing, almost one-quarter of respondents reported the sidewalks in their neighborhood were in only poor or fair condition. Access to public services was perceived more favorably. All (100%) of respondents reported having easy or somewhat easy access to parks, playgrounds, or other green spaces. In addition, almost 93% of respondents reported having easy or somewhat easy access to public libraries. Over 96% of respondents reported having easy or somewhat easy access to community centers or recreational facilities. With a larger number of Loveland residents surveyed in future AFH planning processes, the City of Loveland can better determine if residents across all neighborhoods still find access to public services as easy as those surveyed in this initial effort.
- Lack of regional cooperation – Regionally, economic development departments in towns and cities throughout Larimer County, including the City of Loveland, have an agreement in place requiring them to work together to incentivize and attract economic development to Northern Colorado, thereby eliminating poor practices such as sabotaging or poaching another community’s bids or proposals for new developments. In addition, the Loveland Housing Authority is building not only in Loveland, but in surrounding areas to ensure those residents have affordable options in their home communities, rather than seeking development opportunities only within city limits and forcing those in smaller surrounding communities to move to Loveland to find affordable housing opportunities. A lack of regional cooperation is not identified as a contributing factor to segregation.
- Land use and zoning laws – Land use and zoning laws have not been identified as a major contributing factor of segregation in Loveland. To encourage greater development of affordable housing and to encourage private investments and developments throughout the city, the City of

Loveland has worked in 2017 to revise land use and zoning laws to be more flexible. This may help reduce the likelihood that individual neighborhoods could oppose new developments based on issues of suitability of a structure. City Council also dedicated 1.25% of sales tax revenue to affordable housing projects. Projects in 2018, will access this funding to pay for enterprise fees such as water, sewer and Stormwater .

ii. R/ECAPs

1. Analysis

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and region.

The City of Loveland currently has no R/ECAPs, as illustrated in Map 1.

b. Which protected classes disproportionately reside in R/ECAPs compared to the jurisdiction and region?

Loveland currently has no R/ECAPs, and therefore has no protected classes residing in R/ECAPs. However, when examining GIS data on national origin of residents, there are four noticeable census tracts in the City of Loveland with a concentration of households of Mexican origin.

b. Describe how R/ECAPs have changed over time in the jurisdiction and region (since 1990).

Loveland does not and has not had any R/ECAPs since 1990, as evidenced in Maps 1 and 2. In 1990, however, there was only slight concentration of racial and ethnic minorities, specifically residents identifying as Latino and/or Hispanic in the southwest quadrant of the city. Given the population growth in Loveland as well as the increase in proportion of residents identifying as Hispanic/Latino, there is now an identifiable concentration of Hispanic/Latino in the southwest region of the city.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about R/ECAPs in the jurisdiction and region affecting groups with other protected characteristics.

Loveland currently has no R/ECAPs.

b. The program participant may also describe other information relevant to its assessment of R/ECAPs, including activities such as place-based investments and mobility options for protected class groups.

Given there are no R/ECAPs in the City of Loveland, there is no additional information to contribute.

3. **Contributing Factors of R/ECAPs**

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

There are currently no R/ECAPs in the City of Loveland, and therefore are no factors that have created, contributed to, perpetuated, or increased the severity of R/ECAPs within Loveland.

iii. **Disparities in Access to Opportunity**

1. **Analysis**

a. **Education**

i. For the protected class group(s) HUD has provided data, describe any disparities in access to proficient schools in the jurisdiction and region.

The school proficiency index (taken from Table 12) is a function of the reading and math scores of 4th graders in the geographic area. By race, the school proficiency index ranges from a low among Native American students of 49.13 to a high among Asian/Pacific Islander students of 53.27. White students have a school proficiency index of 52.47. Given the narrow spread of scores for the school proficiency index across races and all income levels, it does not appear there are disparities in access to education in Loveland.

Data for students living in households that fall below the federal poverty line, however, do indicate a greater disparity by race (see Table 12). For these students, the school proficiency index ranges from a low among black students of 41.37 to a high among white students of 51.35. While the index score for white students living in poverty is only one point (approximately) below their white peers of all income levels, the index score for students who are racial and ethnic minorities drop much more substantially. As compared to their racial/ ethnic peers of all income levels, for the student population living in poverty, Hispanic students' school proficiency is around four points lower; Native American students are almost six points lower; Asian/Pacific Islander students are around 7 points lower, and black students are a full 10 points lower. These data indicate that those students who may experience the greatest disparity in access to education are those who are both living in poverty and who identify as a racial or ethnic minority.

ii. For the protected class group(s) HUD has provided data, describe how the disparities in access to proficient schools relate to residential living patterns in the jurisdiction and region.

According to data informing Map 7, there are several census tracts in south and southeast Loveland (001704, 001706, 001901, 002007, and 002008) with school proficiency indexes of 30 or lower. Census tract 001704 in southeast Loveland appears to have the highest concentration of racial and ethnic minorities and has a school proficiency index of only 30. However, this census tract is also heavily populated by white households indicating the higher density of racial and ethnic minorities is a factor of being a more heavily populated area of the community in general. No disparities in access to proficient schools by race and ethnicity are apparent given the data presented in Map 7.

Examining data in Map 7 based on national origin, the highest concentration of foreign-born households (primarily those of Mexican origin) are in census tracts 002005 which boasts school proficiency indices of 58 and 73.

Based on data on family status represented in Map 7, all neighborhoods in Loveland contain between 20.1% and 60% of residents as households with children. Families with children are well-dispersed throughout Loveland, and there are no apparent disparities in access to proficient schools based on family status.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss programs, policies, or funding mechanisms that affect disparities in access to proficient schools.
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As new schools have been built in Loveland, school boundaries have been redrawn, sometimes affecting the demographics of students attending the school. For instance, boundaries affecting Winona Elementary were redrawn after Loveland's newest school, High Plains (K-8), was built. Anecdotally, it was noted that the change moved children with a higher socio-economic status away from Winona, which is a Title I school (64% of students eligible for free and reduced lunch) to a school that has 30% of students eligible for free and reduced lunch.

Thompson School District allows students to "choice" in if the student and their family would prefer to attend a school other than that identified as their neighborhood school. Some schools have implemented programming and extracurricular opportunities for students that may make that school a more appealing choice. For example, Thompson Valley High School has an active Future Farmers of America chapter; Walt Clark Middle School has an active STEM program and curriculum; Truscott Elementary offers dual-emersion programs and curriculum in Spanish.

Although students generally have choice in Thompson School District, some schools are unable to accommodate students who want to attend based on choice because their enrollment is at a maximum with just students who have access to the school because it is their neighborhood school. For example, Loveland High School currently only admits students who live within the LHS geographic boundary. This is a higher-income area of Loveland and the school correspondingly is able to support some strong extracurricular programs such as sports teams and band that other schools are unable to support. Students from other, lower-income neighborhoods whose schools do not have comparable opportunities therefore do not actually have the option to attend this school. Therefore, while there is choice and greater access to opportunities in Thompson School District than if students were required to simply attend their neighborhood school, access to certain schools is still not equitable.

Charter schools also exist in the Thompson School District and students must apply to be admitted. While charter schools are required to not discriminate based on any protected status, they do still have the ability to select those students they prefer attend the school. Feedback from some school staff indicate that many lower-income students may not be selected to attend charter schools unless they live close by those schools.

Finally, schools in Thompson School District have the opportunity to fundraise to support school supplies, equipment, and programming that may affect a school's proficiency. Currently, there is no way to access consistent information about how much additional funding is privately raised each year in each school and what resources are provided to students through that funding.

b. Employment

i. For the protected class group(s) HUD has provided data, describe any disparities in access to jobs and labor markets by protected class groups in the jurisdiction and region.

Data provided in Table 12 indicate there is not great disparity in access to jobs and labor markets based on households' race or ethnicity. For all income levels, the labor market index ranges from a low of 59.93 for Hispanic households to a high of 66.61 for Asian/Pacific Islander households. With an even narrower range, the job proximity index for all income levels ranges from 48.07 for white households to 50.65 for Hispanic households.

Among those who are living below the federal poverty line, the labor market index is slightly lower overall as indicated by a range from 54.67 for black households to 61.11 for white households. The range for the jobs proximity index is higher overall for households living below poverty, ranging from 61.74 for Asian/Pacific Islander households to 65.79 for black households.

ii. For the protected class group(s) HUD has provided data, describe how disparities in access to employment relate to residential living patterns in the jurisdiction and region.

There is not great variation in access to employment across races and ethnicities, including specifically among those living in poverty. Overall, the labor market and jobs proximity indices indicate that lower income Lovelanders generally live closer to jobs, and higher income residents may be able to opt to live in more residential areas and commute to work.

Data included in Map 10 indicate that Loveland, in general, offers poor public transportation options. The highest transit trips index found within a Loveland census tract is 45, with most neighborhoods in Loveland falling between 30.1 and 40 on the transit trips index.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to employment.

Access to reliable and quick public transportation is a persistent issue among residents in Loveland, particularly those who rely on the bus system to commute to jobs and access amenities. Currently the bus system only operates between the hours of 6:38 a.m. – 6:37 p.m. Monday through Friday, and 8:48 a.m. – 5:37 p.m. on Saturdays. The buses do not operate on Sundays. These hours severely restrict job opportunities for those who rely on public transportation. Residents are unable to accept jobs that extend into the evening hours or require work on the weekends. Those who accept jobs with hours that do not align with the bus schedule are burdened by either paying for more expensive transportation such as taxis, or by relying on family, friends, or co-workers to provide them with rides to and from work.

For individuals with disabilities, accessibility of transportation is particularly problematic. Staff from Easter Seals note that the greatest obstacle for persons with disabilities to find employment is reliable transportation to and from work beyond typical working hours.

c. Transportation

i. For the protected class group(s) HUD has provided data, describe any disparities in access to transportation related to costs and access to public transit in the jurisdiction and region.

The transit index in Loveland does not vary much by race and ethnicity, and is comparably low for all populations. For all households included in this index (i.e., 3-person, single-parent family at 50% area median income; see Table 12), the transit trip index ranges from a low of 34.58 for Asian/Pacific Islander households to a high of 37.04 for Hispanic households.

While overall access to transportation is fairly low, the costs of public transportation in Loveland are fairly reasonable, as indicated in the low transportation cost index in Table 12. This index is also calculated based on a 3-person, single-parent family at 50% area median income. The transit index ranges from a low for Asian/Pacific Islander households (at 58.90) to a high for Hispanic families (at 62.64).

ii. For the protected class group(s) HUD has provided data, describe how disparities in access to transportation related to residential living patterns in the jurisdiction and region.

As previously stated, data included in Map 10 indicate that Loveland, in general, offers poor public transportation options. The highest transit trips index found within a Loveland census tract is 45, with most neighborhoods in Loveland falling between 30.1 and 40 on the transit trips index.

Most census tracts in Loveland have fairly affordable transportation costs, as indicated in Map 11. Neighborhoods in the very southwest corner of the jurisdiction have the lowest transportation cost indices (i.e., higher transportation costs). Households that identify as racial or ethnic minorities and/or are foreign-born are not concentrated in those small areas of the community with lower (mid-30's to mid-40's) transportation cost indices. Those census tracts that appear to the highest density of foreign-born households and/or households identifying as racial or ethnic minorities have transportation cost indices between 57 and 66.

iii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to transportation.

In a survey of residents of Loveland, almost 45% of respondents stated their access to public transportation was poor or fair. The City of Loveland is actively trying to improve transportation options for residents. For example, the City is combining the Transportation, Bike & Pedestrian and Transit plans into one plan to look at multi-modal transportation as a whole. This should increase the likelihood that transportation planning and decisions in the future will be more responsive to the needs of people who may not use a car as their primary mode of transportation.

The current bus schedule is also limiting for many people with lower incomes or who are disabled and rely on public transportation. Public Works in the City of Loveland is considering contracting for paratransit services, which will result in a cost savings that may be used to increase dial-a-ride hours to seven days a week for seniors and patrons with disabilities, 24 hours a day. Rides are currently restricted to within Loveland. This service expansion would allow travel outside Loveland's borders with the City paying up to \$20 a trip for someone (rider paying anything above that amount) using this service if the trip starts and ends in Loveland. Contracting for paratransit will also free up City resources (drivers and busses). Public Works recommending those employees and

busses be used to start east/west commuter service on Highway 34, which will greatly enhance public transportation for workers. If initiating an east/west commuter service increases ridership, the City may be able to address north/south commuter needs as well.

d. Access to Low Poverty Neighborhoods

i. For the protected class group(s) HUD has provided data, describe any disparities in access to low poverty neighborhoods in the jurisdiction and region.

According to data captured in Table 12, there is not tremendous disparity in access to low poverty neighborhoods by race or ethnicity. Among all residents, those with greatest exposure to poverty are people identifying as Hispanic, with a Low Poverty Index of 55.15. Asian/Pacific Islander residents have the least exposure to poverty, indicated by a Low Poverty Index of 63.73.

Among those living below the federal poverty line, Hispanic residents again experience the greatest exposure to poverty, represented by a low poverty index of 45.86 (a full 10 points below the measure for Hispanic residents of all income levels). Among those living below the federal poverty line, white residents have the least exposure to poverty of any racial or ethnic community as indicated by a low poverty index of 54.14.

ii. For the protected class group(s) HUD has provided data, describe how disparities in access to low poverty neighborhoods relate to residential living patterns of those groups in the jurisdiction and region?

Those neighborhoods with the lowest Low Poverty indices (i.e., highest exposure to poverty) are primarily located in south Loveland. One neighborhood with a fairly low low poverty index (of 34) is located in north Loveland. For those neighborhoods in south Loveland in which poverty is more concentrated, the Low Poverty Indices range from 31 to 40.

Based on data presented in Map 12, there does not appear to be a concentration of residents identifying as racial or ethnic minorities in those neighborhoods with lower low poverty indices. Similarly, when examining Map 12 with data on National Origin, there is not a concentration of foreign-born individuals in those neighborhoods as compared to neighborhoods with a higher Low Poverty Index. Given families with children are well-dispersed throughout the City of Loveland, there also does not appear to be disparities in exposure to poverty based on household size and composition.

ii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to low poverty neighborhoods.

Much of the disparity in access to low poverty neighborhoods is due to factors of the private housing market. Those neighborhoods in south Loveland which overall have the lowest low poverty indices are older and composed of smaller homes, attracting residents requiring lower costs of living.

The Loveland Housing Authority, while largely reliant on availability and cost of land, intentionally try to disperse new affordable housing developments to reduce the concentration of affordable housing in any one neighborhood.

The City of Loveland is participating in a regional effort through the Continuum of Care to improve landlord engagement efforts, opening up housing options to individuals moving out of homelessness or at-risk of becoming homeless. These efforts may also help ensure Loveland residents who are very low-income and living with disabilities (two common factors of homelessness) have greater access to low poverty neighborhoods.

e. Access to Environmentally Healthy Neighborhoods

i. For the protected class group(s) HUD has provided data, describe any disparities in access to environmentally healthy neighborhoods in the jurisdiction and region.

According to data presented in Table 12, Loveland provides fairly equitable access to environmentally healthy neighborhoods based on race and ethnicity. There is a very narrow range of scores for the Environmental Health Index, from a low among Hispanic residents of 63.25 to a high for white residents of 64.07. Among residents living below the federal poverty line, there is still a fairly narrow range of scores, with Asian/Pacific Islanders representing those with lowest Environmental Health Index (of 61.78) and white residents representing those with the Highest Environmental Health Index (of 63.31). Overall, as illustrated in Map 13, no neighborhood in Loveland has an Environmental Health Index less than 50.

ii. For the protected class group(s) HUD has provided data, describe how disparities in access to environmentally healthy neighborhoods relate to residential living patterns in the jurisdiction and region?

One neighborhood in southeast Loveland (census tract 001704) does appear to have a slightly higher concentration of Hispanic residents than most other neighborhoods, and this neighborhood also has one of the lower Environmental Health Indices in Loveland. However, the Environmental Health Index in this neighborhood is still 56, a fairly health neighborhood with comparably low exposure to harmful toxins. There does not appear to be any disparities in access to environmentally healthy neighborhoods based on country of origin or family size.

ii. Informed by community participation, any consultation with other relevant government agencies, and the participant's own local data and local knowledge, discuss whether there are programs, policies, or funding mechanisms that affect disparities in access to environmentally healthy neighborhoods.

The majority of environmental health efforts impacting Loveland are implemented and funded by Larimer County. In addition to leading Environmental Planning for the area, Larimer County also performs ambient air monitoring for toxins and poor air quality, performs compliance inspections for chlorofluorocarbons, and investigates (and sets to correct) any complaints regarding air quality.

f. Patterns in Disparities in Access to Opportunity

i. For the protected class group(s) HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors.

As indicated by the dissimilarity index reported in Table 3, Loveland has low rates of segregation by race and ethnicity. The highest dissimilarity index is reported between black and white residents (25.16), with the index measuring segregation between Hispanic and white residents (22.24) close behind. All dissimilarity indices reported for Loveland are also lower (representing lower levels of

segregation) than for the region as a whole. While Loveland boasts low rates of segregation currently, trends over time indicate that segregation has increased in the City of Loveland since 1990. For all four racial/ethnic pairings specified in Table 3, the dissimilarity index is higher currently than in 1990. For example, between black and white residents, Loveland reported a dissimilarity index of 16.14 in 1990, 12.99 in 2010, and 25.16 currently. As noted in the data documentation, the reduced index seen in 2010 as compared to 1990 and 2000 is likely due to the exclusion of multiracial individuals from calculations for the dissimilarity index.

The segregation emerging between black and white residents is particularly noteworthy. Between 2010 and now, the dissimilarity index for black and white residents almost doubled from 12.99 to 25.16. If this trend continues, Loveland may expect to see moderate or high segregation between these populations in coming decades. To note, though, is the low proportion of residents who identify as black. Currently, only around half of 1% of Loveland's population identifies as black. With a population this small, segregation may occur more easily than with a larger population of people. However, Asian or Pacific Islander residents also comprise a very small (approximately 1%) portion of the population and comparable segregation has not emerged between this group and white residents.

For many factors, race and poverty have a synergistic effect in that being both a racial or ethnic minority and living in poverty is generally linked to having greater exposure to adverse community factors and less access to opportunity than their white peers. Differences by race and ethnicity are less pronounced among residents of all income levels (i.e., including both those living in poverty and those living above the federal poverty line).

ii. Identify areas that experience an aggregate of low access to opportunity and high exposure to adverse factors. Include how these patterns compare to patterns of segregation and R/ECAPs. Describe these patterns for the jurisdiction and region.

Generally, there are two areas of Loveland that stand out related to access to opportunity and exposure to adverse factors. First, those neighborhoods along the southern edge of Loveland tend to present with lower rates of access to opportunity and higher exposure to adverse factors. Particularly noteworthy is census tract 001704, in the southeast part of Loveland. In this census tract, 42.3% of the population experiences at least one (of the four identified) housing problems, the highest proportion seen in the city of any census tract. This census tract also claims relatively low school proficiency, with school proficiency indices in the area of 30 and 27. The labor market rate is among the lowest in this census tract, as measured by the labor market index of 46. Finally, there is comparably high exposure to poverty in this census tract, with a low poverty index of 40. Other census tracts along the southern edge of Loveland may stand out in one or two factors: census tract 001704 is noticeable given the concentration of several indicators of low access to opportunity and high exposure to adverse factors.

There is also a census tract in the northeast part of Loveland (census tract 001707) that presents with higher indicators of exposure to adverse factors and lower indicators of access to opportunity than the surrounding census tracts. The jobs proximity index for this census tract is fairly low at 27. Poverty is also fairly prevalent in this census tract, as measured by a low poverty index of 34.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disparities in access to opportunity in the jurisdiction and region affecting groups with other protected characteristics.

One of the most prominent and acute factors affecting access to opportunity for Loveland residents is the combination of high median rents and low vacancy rates. Although these factors impact access to safe and stable housing for many Loveland residents, those with lower area median incomes are particularly susceptible to losing their housing (e.g., if a landlord chooses to increase rent to align with rents in the area), living in substandard housing, or being cost-burdened by rent, limiting other opportunities, including having fewer funds to pay for transportation or other needs or being required to work multiple jobs or longer hours to pay rent.

In addition, the Loveland rental market enables landlords to be more selective when identifying new tenants. Although it is illegal to discriminate against potential tenants based on protected classes, there may be correlated identities or factors to those protected classes that can be discriminated against. For example, according to data from the Federal Bureau of Prisons, approximately 38% of inmates nationwide are black¹, although they comprise only 13% of the nation's total population². Inmate data on race from the Larimer County jail is not publicly accessible. However, if there was comparable disproportionate representation in Larimer County, and if landlords could legally screen potential tenants out based on a criminal background, individuals who are black may by correlation be further limited in the housing options.

The lack of adequate public transportation (both related to hours and days of operation as well as to a lack of infrastructure limiting routes and modes of public transportation) is also problematic for those Loveland residents who do not have access to reliable private transportation. The City of Loveland's Transit Plan Update³ outlines a phased approach to improving access to public transit. Corresponding plans and goals also seek to improve the safety and accessibility of other transportation options, including by foot and bicycle. In Phase 1 of the Transit Plan, the City of Loveland will improve transit options for residents by improving time transfers on selected routes operating across transit systems (e.g., Loveland's and neighboring Greeley's), and will redesign routes to increase the routes with bi-directional or loop service (rather than single-direction routes, creating more inefficient routes for riders). In Phase 2 of the Transit Plan, the City of Loveland will work to increase the number of routes operating in Loveland, and will work to expand the days and hours of operation. This expansion of services will continue through Phase 3 of the Transit Plan.

b. The program participant may also describe other information relevant to its assessment of disparities in access to opportunity, including any activities aimed at improving access to opportunities for areas that may lack such access, or in promoting access to opportunity (e.g., proficient schools, employment opportunities, and transportation).

Thompson School District uses a process of choice for students that allows students to enroll in those schools that may have a learning model or extracurricular activities that suit the student well. While this ensures students may have greater access to opportunity than if they were required to attend their neighborhood school, this has still not allowed the district to provide for completely equitable access to opportunity for students and their families. For example and as noted above, Loveland High

¹ https://www.bop.gov/about/statistics/statistics_inmate_race.jsp

² <https://www.census.gov/quickfacts/fact/table/US/RHI225216#viewtop>

³ Located at <http://www.ci.loveland.co.us/home/showdocument?id=658>

School has removed the option to “choice in” for students who are not in the neighborhood given high enrollment rates. This high school is located in a higher income neighborhood, with well-supported extracurricular activities for students. Lower income students living in other neighborhoods should have the option to access this school given district policies but are unable to in practice given current demand for high-quality, proficient schools.

3. Contributing Factors of Disparities in Access to Opportunity

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disparities in access to opportunity.

- Access to financial services
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Lack of regional cooperation
- Land use and zoning laws
- Lending Discrimination
- Location and type of affordable housing
- Location of employers
- Location of environmental health hazards
- Location of proficient schools and school assignment policies
- Occupancy codes and restrictions
- Private discrimination
- The availability, type, frequency, and reliability of public transportation
- Other

The factors most significantly impacting access to opportunity for selected populations include the location and type of affordable housing; the availability, type, frequency, and reliability of public transportation; and, private discrimination.

As previously referenced, Loveland (as all of Northern Colorado) suffers from a lack of affordable housing, both in the supply of publicly-funded or subsidized affordable housing as well as a lack of low-cost housing on the private market. According to the Department of Local Affairs, the average rent in the Fort Collins/Loveland area is \$1,323.73 (as of January 7, 2018) and the fair market rent for 2018 for a two-bedroom apartment is \$1,106. For those below median income, it is particularly difficult to access housing on the private market that will not result in the household being cost-burdened.

The lack of reliable and accessible public transportation also limits opportunities for Loveland residents who are dependent on transit, including low-income and disabled households. The City of Loveland has developed a long-term Transit Plan that seeks to improve the effectiveness and efficiency of current services as well as expand transit options by increasing the days and hours of operation and adding additional service routes. While the final result will be a transit system that works to increase access to opportunity for transit-dependent residents, these changes are under development and will take years (as well as the cultivation of funds) to take effect. Residents currently have few options other than attempting to access transportation through private means, including spending more money on transportation by paying for taxis or attempting to access rides from neighbors, friends, family members, or co-workers.

Greater information regarding private discrimination will be collected through more robust citizen engagement efforts and surveys. The Community Partnerships Office in the City of Loveland has initial evidence, through existing complaints filed, that private discrimination does exist. Ensuring residents are aware of fair housing laws, their rights, and actions to take to report discrimination will also provide a sense of the true scope of private discrimination as well as provide City leaders and staff with better information to develop appropriate interventions to address this discrimination.

iv. Disproportionate Housing Needs

1. Analysis

a. Which protected class groups (by race/ethnicity and familial status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups for the jurisdiction and region? Which groups also experience higher rates of severe housing burdens when compared to other groups?

Overall, around 34% of households in Loveland are experiencing at least one housing problem. Hispanic (41.32%), Asian or Pacific Islander (56.06%), Native American (43.82%), and Other Non-Hispanic (42.43%) households experience housing problems at a higher rate than the average of 34%. While the rate of households experiencing housing problems are typically higher among those households identifying as a racial or ethnic minority, given the large proportion of Loveland residents who are white, the majority of households who experience a housing problem are white. In total, almost 90% of households experiencing one of the four identified housing problems are white.

Non-family households experience housing problems more commonly than family households. Over 43% of non-family households are experiencing at least one of four identified housing problems. Smaller families (less than five people) experience the lowest rate of housing problems, with just under 29% of families experiencing at least one housing problem. Larger families (five person households and larger) are more likely to experience a housing problem. Over 37% of large family households experience at least one housing problem.

b. Which areas in the jurisdiction and region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?

According to Map 6, Census tract 001704 (in the southeast corner of Loveland) has the highest concentration of households with any of the four housing burdens identified. While there are no R/ECAP's in Loveland, this census tract does have a higher concentration of Hispanic households than in the City overall. Less than 12% of Loveland's population overall identifies as Hispanic, but in the 001704 census tract almost 21% of residents are Hispanic.

Given the higher proportion of residents identifying as Hispanic in census tract 001704, it is not surprising this neighborhood is also home to a higher-than-average proportion of residents who originate from Mexico. Overall, 2.36% of Loveland's population identifies their country of origin as Mexico. In this neighborhood, almost 5% of residents have originated from Mexico.

c. Compare the needs of families with children for housing units with two, and three or more bedrooms with the available existing housing stock in each category of publicly supported housing for the jurisdiction and region.

Almost 43% of households in Loveland are families with children. This percentage has dropped over the past 20 years. In 1990, over 52% of all households in Loveland were families with children.

According to data in Tables 9 and 10, among smaller families (i.e., fewer than five people), almost 29% of all families experience disproportionate housing needs and over 10% of all smaller families experience a severe cost burden. While the number of larger families (five or more people) is significantly lower than those of smaller families, a higher proportion of larger families experience disproportionate housing needs and severe cost burdens. Overall, over 37% of larger families have at least one housing problem and almost 12% of larger families experience a severe housing cost burden.

In Loveland, the HCV program provides the greatest access to housing for 2-bedroom units (228 units), 3-bedroom units (164 units), and for families with children (198 households), according to data presented in Table 11. An additional 157 units (2-bedroom, 3-bedroom, and for households with children) are provided through project-based Section 8 units. The majority of project-based Section 8 units (146 units or almost 63% of all project-based Section 8 units) are 0 or 1-bedroom units.

d. Describe the differences in rates of renter and owner occupied housing by race/ethnicity in the jurisdiction and region.

Over 93% of homeowners in Loveland are white, according to data presented in Table 16. Another 4.8% of homeowners identify as Hispanic, and 1.5% of homeowners identify as Asian or Pacific Islander. Each other racial/ethnic community comprises less than 1% of homeowners in Loveland.

White residents also comprise the largest proportion (83.6%) of renters in Loveland. Almost 12% of renters identify as Hispanic, and another 2.4% of renters identify as another race (not Hispanic). Each other racial/ethnic community comprises less than 1% of renters in Loveland.

Other than whites, Asian or Pacific Islanders are the only other racial/ethnic category that represents a higher proportion of homeowners than renters. All other racial/ethnic minorities represent a higher proportion of renters than homeowners.

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and region affecting groups with other protected characteristics.

Housing providers in the area acknowledge that very large families who are low income are more limited in their housing options. Even with assistance in the form of a housing voucher, large families struggle with accessing housing that is large enough to accommodate the family without overcrowding.

Individuals with disabilities also experience difficulties in identifying accessible units, particularly for individuals with orthopedic disabilities, people who use wheelchairs, and individuals who are blind. Disabled Resource Services estimates 100 – 200 accessible units are needed to accommodate the current needs of individuals with disabilities without accessible units.

b. The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA’s overriding housing needs analysis.

One population commonly identified as having issues accessing safe and affordable housing are individuals exiting from institutional settings to community-based housing. As publicly-supported housing units often have lengthy waitlists, individuals trying to move back into the community from jails or hospitals may instead end up severely cost burdened, living in unsafe or inhabitable housing, or homeless given the lack of easily accessible publicly supported housing.

3. Contributing Factors of Disproportionate Housing Needs

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disproportionate housing needs.

- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Lack of housing support for victims of sexual harassment, including victims of domestic violence
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending Discrimination
- Other

The overall lack of low-income and affordable housing units available is one of the greatest contributors to the disproportionate housing needs in Loveland. As the private housing market has tightened and fair market rent has increased, private landlords have become more selective, both in selecting tenants and in being willing to rent to households using a housing voucher. Currently, around 2,500 households remain on the waitlist for a Housing Choice Voucher through the Loveland Housing Authority. The majority (approximately 84%) require 1- or 2-bedroom housing units.

As housing costs have increased, some residents have been forced to relocate to more affordable rental units and, at times, other communities. Although Loveland’s housing costs are high compared to other comparably-sized cities in the country, other cities in the region (including Fort Collins directly to north) are still slightly more expensive. With rising housing costs in those areas, residents may seek more affordable housing in Loveland, leaving current Loveland residents to seek housing outside of town to meet their needs.

The City of Loveland has committed significant public funds to incentivize affordable housing development, including funding to backfill or offset development fee waivers. In addition, Loveland’s land use and zoning codes are fairly flexible and require few conditions for development, as long as the proposed development generally fits in with the character and use of the surrounding neighborhood.

Despite these efforts of the City of Loveland to aid affordable housing development, the high cost of land and statewide laws are still prohibitive to affordable housing development.

C. Publicly Supported Housing Analysis

1. Analysis

a. Publicly Supported Housing Demographics

i. Are certain racial/ethnic groups more likely to be residing in one category of publicly supported housing than other categories (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and Housing Choice Voucher (HCV)) in the jurisdiction? Compare the racial/ethnic demographics of each category of publicly supported housing for the jurisdiction to the demographics of the same category in the region.

According to data provided in Table 6, the overwhelming majority of residents in publicly supported housing in Loveland are white. White households comprise 86.34% of project-based Section 8 units, 81.02% of Housing Choice Voucher holders, and 92.31% of multifamily units. These figures generally align with the overall population breakdown, in which around 85% of Loveland residents identify as white.

Black residents comprise 0.51% of Loveland’s total population, but based on provided data, no black households reside in publicly supported multi-family housing. Just over 2% of Housing Choice Vouchers are held by black households, and 1.32% of households residing in project-based Section 8 units identify as black.

Among all Loveland residents, 11.70% of the population identify as Hispanic. Hispanic households reside in just over 11% of all project-based Section 8 units and hold just over 16% of all Housing Choice Vouchers in Loveland. Hispanic families, similar to black families, are underrepresented in other multifamily units. Only four of the 79 multifamily units available (or 5.13%) are occupied by Hispanic families.

The next iteration of the AFH will include data specifically from the Loveland Housing Authority, including surveying residents at each of their properties.

ii. Compare the demographics, in terms of protected class, of residents of each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

Based on the most recent data provided in Table 1, there are 66,866 residents living in Loveland. The majority of residents (84.8%) identify as white. Hispanic residents comprise 11.7% of the population, Asian or Pacific Islander residents comprise 1% of the population, Black residents comprise .5% of the population, and Native Americans comprise .5% of the population. About 1.4% of the population identify as two or more races. The racial/ethnic breakdown of those who are eligible for affordable housing (i.e., earning 80% of area median income or less) is fairly similar to the overall population of Loveland. Among this population, 89.6% identify as white, .4% identify as black, 7.3% identify as Hispanic, and 1.2% identify as Asian or Pacific Islander.

The racial breakdown of residents living in project-based Section 8 housing is fairly comparable to the overall population of Loveland as 86% of residents are white and 11% are Hispanic. A higher proportion of residents are black, as compared to the overall population, with 1.3% of residents in project-based Section 8 housing identifying as black. There is also a lower proportion of residents who are Asian or Pacific Islander, as compared to the overall population, with only .44% of the residents in project-based Section 8 units identifying as Asian or Pacific Islander.

In other multifamily properties, there is a higher proportion of white and Asian or Pacific Islander households, with 92.3% of households identifying as white and 2.6% of households identifying as Asian or Pacific Islander. In these properties, no resident households identify as black and only 5.1% of households identify as Hispanic. There are relatively few other multifamily units, however, and the addition of one or two households of a certain racial or ethnic community can substantially impact the overall racial/ethnic breakdown of this type of affordable housing property.

In the HCV program, black and Hispanic families are represented at higher rates than in the population in general or in the population of households earning 80% of area median income or less. Two percent of households using Housing Choice Vouchers identify as black, and 16.1% of households using HCV identify as Hispanic. About 81% of HCV holders identify as white and .4% identify as Asian or Pacific Islander.

b. Publicly Supported Housing Location and Occupancy

i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.

There are no R/ECAPs in the City of Loveland. According to data presented in Map 5, census tract 001809 contains the highest proportion of voucher holders at almost 19%. This census tract is in the northwest area of the City, and has a lower concentration of racial and ethnic minority households than in the population as a whole. Adjacent to this 001809 is census tract 001806. In this census tract, 7.8% of households are living in vouchered units. Also in this census tract is a multifamily development housing 79 households. The racial/ethnic breakdowns for this census tract are comparable to the overall population of Loveland, as 87.3% of residents identify as white, 9.2% identify as Hispanic, .4% identify as black, .4% identify as Native American, and 1.1% identify as Asian or Pacific Islander.

Census tract 001706 in central east Loveland has the second highest concentration of voucher holders, with 15.1% of residents in the area using housing vouchers. In this census tract there are also two developments using project-based Section 8 vouchers to provide affordable housing (Maple Leaf and Silver Leaf). The neighborhoods in which these two housing developments lie have a higher proportion of Hispanic residents as compared to the population of Loveland as a whole. Hispanic households represent 16.4% of the population of the neighborhood that is home to Maple Leaf and 17.1% of the population of the neighborhood that is home to Silver Leaf.

ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region?

There are no R/ECAPs in Loveland.

iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?

There are no R/ECAPs in Loveland.

iv. (A) Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.

Loveland does not have any public housing. Property-level data on LIHTC properties were not able to be pulled from Map 5.

(B) Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.

Among project-based Section 8 properties, the racial/ethnic breakdown of residents is comparable across properties with the exception of Big Thompson Manor in south Loveland. In this affordable housing property for seniors, 98% of residents are white and 2% identify as black. For other project-based Section 8 properties, the proportion of white residents is lower, between 77% and 81% of residents. Hispanic residents typically comprise 13% - 19% of residents, black residents comprise up to 2% of residents, and Asian or Pacific Islander households also comprise up to 2% of households.

v. Compare the demographics of occupants of developments, for each category of publicly supported housing (public housing, project-based Section 8, Other HUD Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

Data presented in Map 5 provide information on the demographics of Other Multifamily and Project-Based Section 8 properties in the City of Loveland. Data were not available at a project-level for LIHTC properties.

Harvest Pointe (an Other Multifamily) property has a slightly higher proportion of white residents (93%) than in the neighborhood (census tract 001806). Within the census tract, 86% of residents identify as white and 10% identify as Hispanic.

Two Project-Based Section 8 properties (Orchard Place and Maple Terrace) are home to a lower proportion of white residents than in the census tract in which the property was located. At Orchard Place, 19% of residents identify as Hispanic, 2% as black, and 79% as white. Comparatively, in the census tract, 14% of residents identify as Hispanic, .71% identify as black, and 81% as white. At Maple Terrace, 2% of residents identify as Asian, 2% as black, 19% as Hispanic, and 77% as white. Comparatively, in the census tract, 1% of residents identify as Asian, 1% as black, 16% as Hispanic, and 81% as white. A total of 86% of residents at Orchard Place are families with children and 56% of residents in Maple Terrace are families with children. Data on household composition were not provided at the census tract level.

Big Thompson Manor, a Project-Based Section 8 property, is home to a much higher proportion of white residents as compared to the surrounding census tract. In Big Thompson Manor, 2% of residents identify as Hispanic and 98% identify as white. Within the census tract, 1% of residents identify as Asian, 1% identify as black, 16% identify as Hispanic, and 81% identify as white

Silver Leaf, another Project-Based Section 8 property has a more comparable demographic breakdown as compared to the surrounding census tract than other Project-Based Section 8 properties. At Silver Leaf, 1% of residents identify as Asian, 13% identify as Hispanic, and 81% as white. In the census tract, 1% of residents identify as Asian, 1% as black, 16% as Hispanic, and 81% as white.

Orchard Place and Silver Leaf are the only properties listed that are owned and managed by the Loveland Housing Authority.

c. Disparities in Access to Opportunity (p. 39 in Pueblo)

i. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other HUD Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

The census tracts in which the majority of housing programs are located include tracts 1806, 1707, 1706, and 2007. These census tracts have a low transportation index ranging from 57 to 68, a school proficiency index ranging from 41 to 70, and a jobs proximity index ranging from 12 to 90. Data for each census tract are included in the table below.

Census Tract	Low Transportation Index	School Proficiency Index	Jobs Proximity Index
001806	57	70	12
001707	68	60	84
001706	66	41	75
002007	74	48	90

2. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about publicly supported housing in the jurisdiction and region, particularly information about groups with other protected characteristics and about housing not captured in the HUD-provided data.

While availability of affordable and publicly supported housing is in short supply, and therefore difficult to access for most who would qualify, there are certain populations that have a more difficult time accessing available units, based on anecdotal evidence from community partners. Very large families often face difficulties in identifying affordable housing. Individuals with

disabilities also struggle to find accessible units or are unaware that basic accommodations must be made to enable them to reside in a unit.

b. The program participant may also describe other information relevant to its assessment of publicly supported housing. Information may include relevant programs, actions, or activities, such as tenant self-sufficiency, place-based investments, or mobility programs.

Programs exist in Loveland to assist families in accessing housing that is affordable and appropriate for their needs. For example, Habitat for Humanity is active in Loveland, providing home ownership opportunities for low-income residents. In addition, Project Self-Sufficiency, a non-profit operating in Larimer County, supports approximately 160 low-income, single-parent families in programs that assist families in becoming more financially stable and self-sufficient. Neighbor to Neighbor also operates throughout Larimer County and provides clients with access to homelessness prevention services, first month's rental assistance (to support households in regaining housing after being homeless), and services to assist with budgeting and planning to avoid future housing crises.

3. Contributing Factors-of Publicly Supported Housing Location and Occupancy

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- Community opposition
- Impediments to mobility
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities
- Lack of regional cooperation
- Land use and zoning laws
- Occupancy codes and restrictions
- Quality of affordable housing information programs
- Siting selection policies, practices and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
- Source of income discrimination
- Other

The locations of publicly supported housing available are typically based on the availability of land for sale at the time of development, the cost of available land, and (if possible), access to transportation and opportunity. As is common with affordable housing developments, there has been opposition expressed from surrounding neighborhoods with each new affordable or publicly supported housing development recently. With extensive outreach and engagement with neighbors, the Loveland Housing Authority (the primary affordable housing developer in Loveland) has been able to mollify concerns and proceed with the projects as planned.

The Loveland Housing Authority maintains a work/live Loveland preference for most properties, for which individuals who either currently work or live in Loveland are prioritized over those coming from outside of the community. This preference has not been shown to contribute to segregation or disparities in access to opportunities for any protected classes.

Investments in neighborhoods may have one of two effects. First, targeted investments in infrastructure in certain neighborhoods (including better sidewalks, lighting, etc.) can increase accessibility and opportunity for residents in those neighborhoods. Second, targeted investments may increase the overall appeal and affordability of housing in the surrounding neighborhoods, potentially making it more difficult for those who are cost burdened to continue to rent in those neighborhoods. Recently, major public and private investments in the downtown area have raised concerns regarding the affordability of housing in adjacent neighborhoods. The City of Loveland is and will continue to monitor issues of housing affordability in these areas, and will continue to work with the Loveland Housing Authority and other housing developers to ensure a mix of market rate and affordable housing is available throughout the city.

D. Disability and Access Analysis

1. Population Profile

a. How are persons with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

Overall, individuals living with disabilities are well-dispersed throughout the City of Loveland. Based on data provided in Map 14, there does not appear to be a substantial concentration of individuals living with disabilities in any neighborhood.

While there is a lower density of residents with disabilities living in the northwest area of the city, this is an area that has been more recently developed and therefore has a lower density of residents overall. A similar pattern exists for the eastern side of the City, east of Boyd Lake.

b. Describe whether these geographic patterns vary for persons with each type of disability or for persons with disabilities in different age ranges for the jurisdiction and region.

When examining data provided in Map 14 based on disability type, individuals living with disabilities are fairly evenly dispersed throughout the core of the city. However, in the southern area of the City there are slightly higher proportions of individuals living with hearing disabilities, ambulatory disabilities, self-care disabilities, and independent living disabilities as compared to the county as a whole. For example, in census tract 002008, 6.02% of residents are living with hearing disabilities as compared to 3.94% of Loveland's population. In addition, 7.89% of the population is living with ambulatory disabilities (compared to 5.83% of the county), 5.38% is living with self-care disabilities (as compared to 1.98% of the population), and 7.99% is living with independent living disabilities (as compared to 3.82% of the population).

2. Housing Accessibility

a. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

The City of Loveland does not have sufficient affordable, accessible housing in a range of unit sizes for the entirety of the population, and specifically for individuals living with disabilities. As of June 2017, almost 17% of all households on the waitlist for housing through the Loveland Housing Authority self-identified as having a disability. In addition, Disabled Resource Services estimates a need for 100 – 200 units specifically for individuals living with mobility impairments.

The Loveland Housing Authority provides 75 vouchers to Disabled Resource Services to provide to households with disabilities. Frequently, even when a household is able to access housing assistance through a voucher, the household may be unable to locate housing that accepts a voucher and meets their needs given family size or accommodations. As with the population as a whole, the units that are in the shortest supply are studio/one-bedroom units for single adults or large (e.g., 4+ bedrooms) units for very large families.

b. Describe the areas where affordable accessible housing units are located. Do they align with R/ECAPs or other areas that are segregated for the jurisdiction and region?

The City of Loveland does not have any R/EAPs.

The highest concentration of affordable housing in the City is located in census tract 001706, in which almost 63% of rental units are affordable to individuals living at 50% of AMI. This census tract has a comparable demographic (by race and ethnicity) breakdown as compared to the population of Loveland as a whole.

c. To what extent are persons with different disabilities able to access and live in the different categories of publicly supported housing for the jurisdiction and region?

Between 5.27% and 5.76% of adults living in Loveland are living with a disability. Almost 23% of all residents living in Project-Based Section 8 units and almost 29% of people using a Housing Choice Voucher in Loveland are living with a disability. In Other Multifamily units in Loveland, there are no individuals living with disabilities. This is likely due to the overall low number of Other Multifamily units existing in Loveland.

The higher proportion of individuals living with disabilities in publicly supported housing indicates these units are accessible to persons with disabilities. As previously mentioned, individuals with disabilities may have difficulty identifying accessible units on the private market. Those attempting to rent using a Housing Choice Voucher may have additional difficulties given rental limits and a lack of landlords willing to accept a voucher as a form of rental payment. While there is anecdotal evidence from local service providers that this is an issue, there are no data to indicate to what degree the housing search process may be impacted or delayed given one's disability status. This is another area that can be explored through the survey that will be presented with the next iteration of the AFH.

3. Integration of Persons with Disabilities Living in Institutions and Other Segregated Settings

a. To what extent do persons with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Based on knowledge of organizations engaged in this process, there are limited segregated housing settings for people with disabilities. Specifically, there are a few sober living facilities for individuals with substance use disorders. As there are no significant areas of segregation as evidenced by the lack of R/ECAPs in Loveland; and, according to Map 14, individuals with disabilities are well dispersed throughout the City of Loveland, it appears Loveland residents with disabilities typically reside in integrated settings.

b. Describe the range of options for persons with disabilities to access affordable housing and supportive services in the jurisdiction and region.

Affordable housing and supportive services for persons with disabilities are in limited supply in the City of Loveland. Disabled Resource Services and SummitStone Health Partners are the primary providers of supportive services for individuals with disabilities. Disabled Resource Services also administers some Housing Choice Vouchers for clients, although there is typically a lengthy waitlist.

Loveland residents who are experiencing homelessness can be placed on the by-name list for the region's Coordinated Entry System, a requirement by HUD for Continuum of Care and Emergency Solutions Grant funding. The resources dedicated to the Coordinated Entry process prioritize those who are disabled and who have been on the streets for the longest length of time. While the intensity of services may differ, those permanent supportive housing and rapid re-housing resources offered through Coordinated Entry come with rental assistance (of varying lengths of time) and supportive services.

Given the lack of affordable housing in the City of Loveland, most individuals with disabilities will access housing through the private rental market.

4. Disparities in Access to Opportunity

a. To what extent are persons with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:

i. Government services and facilities

City of Loveland facilities are accessible for persons with disabilities with the exception of the water treatment and waste water plants, and the electric substation. These areas are also not available to the public.

The City of Loveland Parks & Recreation Department completed an ADA Transition Plan in early 2018. The plan addresses deficiencies in access to parks and access to play equipment in parks based on Title II requirements, including recommendations for corrections. The Transition Plan included community feedback and input.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

The City of Loveland Public Works completed a Transition Plan for curb ramps (and truncated domes) within the public right of way in September 2015. The plan indicated that about 75% of the City's ADA curb ramps were inventoried for compliance with the 2014 Americans with Disabilities Act Accessibility Guidelines (ADAAG) and 35% of the inventoried ramps met the guidelines at that time. It also stated that 57% of the inventoried ramps were compliant but are now not compliant given changes in the standard. The City of Loveland Public Works will always follow current construction standards and continues to work to remain compliant with the Transition Plan.

iii. Transportation

Paratransit services exist to provide individuals with disabilities who are prevented from riding traditional fixed route buses door-to-door service. The regular fare for a single ride on Paratransit is \$2.00, with a reduced rate of \$1.00 available to those who qualify. While Paratransit offers a needed and valuable service for individuals with disabilities, the utility and impact of Paratransit is limited, largely given the hours of operation. Currently, Paratransit operates from 6:38 a.m. – 6:37 p.m., Monday – Friday, and from 8:48 a.m. – 5:37 p.m. on Saturday. No services are provided on Sundays. Beginning in April 2018, Dial-A-Ride (a service of Transfort in Fort Collins) will begin to provide paratransit services for Loveland residents. Hours of operation will still be limited to riders, as Dial-A-Ride only operates from 8:00 a.m. – 5:00 p.m., Monday – Saturday.

Senior Alternatives in Transportation (SAINT) is a non-profit organization operating in Loveland and serving individuals 60 years and older and individuals with disabilities. SAINT provides pre-scheduled transportation to any location within their service area. SAINT operates from 8:15 a.m. – 4:00 p.m. Monday – Friday.

iv. Proficient schools and educational programs

Thompson School District coordinates special education services for students with disabilities. In addition to classroom-based services, such as special education teachers and paraprofessionals, supportive services may be provided to eligible students including nursing, social worker services, speech and language services, occupational therapy, physical therapy, adaptive physical education, parent liaison services, and psychological services. These services are available to any identified student in the school district regardless of the school attended.

v. Jobs

Easter Seals of Loveland provides services for individuals of all ages with disabilities. Staff at Easter Seals report the greatest obstacle for persons with disabilities to find employment is reliable transportation to and from work beyond typical working hours. Given the limited operating hours of Paratransit and SAINT, individuals are more limited in their employment options given they can only accept employment during traditional work hours if they rely on these transportation services. Staff also report a lack of businesses willing to hire persons with disabilities, particularly if additional training or accommodations are required to support the employee. Although obstacles exist, Easter Seals help 27 clients find jobs in 2017.

b. Describe the processes that exist in the jurisdiction and region for persons with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

The Loveland Housing Authority is the largest provider of affordable housing in the City of Loveland. Rather than maintaining a separate waitlist for accessible units, residents requiring accommodations submit a Request for a Reasonable Accommodation/Modification Due to a Disability application to address a specific need. A copy of the application can be located at <https://lovelandhousing.org/wp-content/uploads/2017/04/LHA-504-Applicaiton.pdf>

A report compiled by the Loveland Housing Authority in 2013 showed 61% of requests for accommodations were for service animals, 23% of requests involved moving to another unit, and 12% of requests were for other, miscellaneous accommodations including laying new carpet, reducing rent to account for the cost of childcare, or providing a curb-side mailbox. Approximately 4% of accommodation requests were for more expensive accommodations, such as providing a walk-in shower. The Loveland Housing Authority works hard to accommodate all requests.

c. Describe any difficulties in achieving homeownership experienced by persons with disabilities and by persons with different types of disabilities in the jurisdiction and region.

During the community engagement process informing the City of Loveland's AFH, participants were asked the level of need related to specific homeownership goals, including the need to provide modifications for persons with disabilities. Out of 59 total respondents, over 64% of respondents identified modifications for persons with disabilities as a moderate, high, or critical need in the community.

In general, there is also a lack of entry-level properties for purchase on the Loveland housing market as median home values are high and there is a lack of construction of condominiums, as compared to single-family homes. According to the real estate website Zillow, the median home value in Loveland is \$326,700 (as of January 2018). For individuals with limited income, homeownership is virtually impossible given the high and increasing prices of housing in the Loveland market.

The City of Loveland contributed a reduction of fees for a development on the northwest side of the city called Enchantment Ridge. This subdivision sold homes to 84 people living at or below 70% of the area median income (72 single-family homes and 12 condos that were started in late 2017). Another subdivision just north of Enchantment Ridge will provide at least 60 more single-family homes to residents at the same AMI.

5. Disproportionate Housing Needs

Describe any disproportionate housing needs experienced by persons with disabilities and by persons with certain types of disabilities in the jurisdiction and region.

Many individuals living with disabilities are doing so on a fixed income as the majority are unable to secure and retain full-time, well-paying employment. For someone trying to sustain housing on the monthly income of \$700 - \$800 that SSI or SSDI provides, finding an affordable place to live is extraordinarily difficult. Either they must rely on luck and chance in accessing a subsidized unit or housing choice voucher to provide adequate financial support to pay for housing, or they must find a unit well below the median rent on the private market. Units below the median rent are often

lacking in basic amenities, are unsafe, are not accessible, or otherwise provide inadequate accommodation. Individuals with ambulatory disabilities make up the largest proportion of individuals with disabilities in Loveland (almost 28% of all individuals with disabilities) and fully accessible units for wheelchairs are scarce as well. As providing safe housing may require physical modifications that some landlords are unwilling to complete (or unaware of their legal requirement to complete), these individuals may carry an additional burden in their search for safe, affordable housing.

6. Additional Information

a. Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting persons with disabilities with other protected characteristics.

Generally, any issues faced by the overall population in accessing affordable, accessible, safe housing is more difficult for individuals with disabilities. In 2015, the Loveland Housing Authority estimated they had over 650 applicants on their housing choice voucher waitlist who were living with disabilities. This demand indicates Loveland residents with disabilities, due to lack of sufficient income, are struggling to afford housing on the Loveland market.

7. Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- Access to proficient schools that are accessible for persons with disabilities
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible public or private infrastructure
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing – Don't have much around this; people exiting mental health institution, leave with support; don't leave incarceration with support. Have no housing designated for people exiting from incarceration
- Land use and zoning laws
- Lending Discrimination
- Location of accessible housing
- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities
- State or local laws, policies, or practices that discourage individuals with disabilities from being placed in or living in apartments, family homes, and other integrated settings

- Other

As previously mentioned, the most pressing issue contributing to the severity of disability and access issues is the lack of affordable housing resources. More designated affordable units are needed, particularly those that can accommodate individuals with disabilities, such as ambulatory disabilities. In addition, greater access to permanent supportive housing that could provide stable, safe, and accessible housing for individuals who are both severely disabled and experiencing homelessness is recognized as a dire need.

Individuals with disabilities are also limited in access to opportunity given the lack of public or affordable transportation options in Loveland. The bus system, as well as paratransit services, run on limited hours and days, restricting individuals' ability to work in certain jobs or engage in the community as freely as they could if they had more flexible and accessible transportation options. The SAINT system is available for persons with disabilities because volunteer drivers are unable to accommodate items such as wheelchairs or other large equipment.

E. Fair Housing Enforcement, Outreach Capacity, and Resources Analysis

1. List and summarize any of the following that have not been resolved: a charge or letter of finding from HUD concerning a violation of a civil rights-related law, a cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law, a letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law, or a claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing.

There are no issues or violations occurring in the City of Loveland of the nature specified (e.g., violation of a civil rights-related law, violation of fair housing law, findings of systemic violations of fair housing or civil rights law, or a claim under the False Claims Act) that have not been resolved.

2. Describe any state or local fair housing laws. What characteristics are protected under each law?

Colorado first instituted protections from discrimination in housing in 1959, almost a decade prior to the federal Fair Housing Act. The first iteration of the Colorado Fair Housing Act prohibited discrimination based on race, creed, color, national origin, or ancestry. In 1969, "sex" was added as a protected class. "Marital status" and "religion" were added as protected classes in 1973. In 1977, "physical handicap" was added as a protected.

After the federal Fair Housing Act was amended in 1988, the Colorado Housing Act was also amended to align with new federal regulations and expectations. Specifically, Colorado law was expanded to include protections based on familial status and expanded protections for people with disabilities from those with physical disabilities to those with either physical or mental disabilities.

Current anti-discrimination laws related to housing can be found in the Colorado Revised Statutes (CRS 24-34-502), and include protections for the following classes: disability, race, creed, color, sex, sexual orientation, marital status, familial status, religion, national origin, and ancestry.

Loveland housing providers are expected to adhere to all federal and state anti-discrimination and fair housing laws. No local ordinances exist specifically related to fair housing in Loveland.

3. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

The Loveland Housing Authority and the City of Loveland Community Partnership Office are the two primary agencies that provide fair housing information, outreach, and enforcement in the City of Loveland. The Community Partnerships Office is composed of two full-time staff who manage complaints when they are brought to the attention of the City of Loveland. In addition, information on fair housing is frequently incorporated into community presentations or displays attended by Community Partnerships staff.

The Loveland Housing Authority responds to complaints brought forth by Loveland residents living in their properties or using a housing choice voucher. The Loveland Housing Authority aims to make every tenant aware of their rights and the basic tenets of fair housing laws. Currently, the Loveland Housing Authority is undergoing a process to revise information regarding fair housing laws and processes tenants should take to bring forth grievances. Once completed this information will be provided to tenants and posted on the Loveland Housing Authority website.

4. **Additional Information**

a. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

The State of Colorado provides information and resources to state residents regarding renters rights, including information on Fair Housing laws. An overview of landlord/tenant laws and rights existing in Colorado can be found at <https://www.colorado.gov/pacific/sites/default/files/Attachment%2010-Landord%20and%20Tenant%20Rights.pdf>.

In addition, the Colorado Department of Regulatory Affairs, Civil Rights Division receives grievances from tenants who have been discriminated against, violating fair housing laws. The Civil Rights Division also hosts regular “Fair Housing 101” courses for those interested in better understanding Fair Housing laws. Specific attention is paid to issues of disability discrimination, including providing accommodations and modifications for households with disabilities.

b. The program participant may also include information relevant to programs, actions, or activities to promote fair housing outcomes and capacity.

5. **Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors**

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing enforcement, outreach capacity, and resources and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- Lack of local private fair housing outreach and enforcement – Is an issue
- Lack of local public fair housing enforcement – Is an issue; lack of capacity
- Lack of resources for fair housing agencies and organizations - Yes
- Lack of state or local fair housing laws – No; laws are adequate
- Unresolved violations of fair housing or civil rights law - No
- Other

There is a lack of capacity among both private and public entities to provide outreach, enforcement, and other resources related to fair housing. In addition, there are no local organizations specifically focused on providing outreach, education, and enforcement related to fair housing issues. While it may be an opportunity to have one locally based organization focus on this work, there are already fair housing-dedicated organizations in the Denver metro area, including the Denver Metro Fair Housing Center (<http://www.dmfhc.org/>). A more efficient means to build the capacity of Loveland to ensure adequate education, outreach, and enforcement capacity for fair housing issues may involve partnering with an existing entity and identifying opportunities to expand their reach beyond the Denver metro area.

While the lack of capacity for enforcing and educating fair housing issues and laws is problematic for Loveland, the current laws existing and ability to resolve violations are not identified by the City of Loveland as significant issues.

Part VI: Fair Housing Goals and Priorities

The Community Partnership Office will set goals based on the belief that a full AFH will be completed in 2019 and submitted to the Office of Fair Housing in 2020. Therefore, the goals described below are based on the assumption of a one and a half year time frame and CDBG funds of no more than \$400,000 for any one year. The current CDBG allocation is \$369,693.

Over the next year and a half, the CPO will:

- Work with the community partners listed in this document to more fully understand the housing, education, poverty and other data described above to create a strategy to survey and discuss priorities with Loveland residents. The CPO receives little annual CDBG funding and projects are not placed based but come from organizations able to complete the project. The CPO will request technical assistance from the Office of Fair Housing about combining barriers to place based inventing with our current grant distribution structure.
- The CPO will request technical assistance from the Office of Fair Housing to better understand how to monitor mortgage denials based on race/ethnicity or gain access to other information that can point to discrimination.

APPENDIX A – HUD-Provided Maps

Map 1 Race/Ethnicity – Current (2010) race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Map 2 Race/Ethnicity Trends – Past (1990 and 2000) race/ethnicity dot density maps for Jurisdiction and Region with R/ECAPs

Map 3 National Origin – Current 5 most populous national origin groups dot density map for Jurisdiction and Region with R/ECAPs

Map 4 LEP – LEP persons by 5 most populous languages dot density map for Jurisdiction and Region with R/ECAPs

Map 5 Publicly Supported Housing and Race/Ethnicity – Public Housing, Project-Based Section 8, Other Multifamily, and LIHTC locations mapped with race/ethnicity dot density map with R/ECAPs, distinguishing categories of publicly supported housing by color, for the Jurisdiction and Region

Map 6 Housing Choice Vouchers and Race/Ethnicity – Housing Choice Vouchers with race/ethnicity dot density map and R/ECAPs, for the Jurisdiction and Region

Map 7 Housing Burden and Race/Ethnicity – Households experiencing one or more housing burdens in Jurisdiction and Region with race/ethnicity dot density map and R/ECAPs

Map 8 Housing Burden and National Origin – Households experiencing one or more housing burdens in Jurisdiction and Region with national origin dot density map and R/ECAPs

Map 9 Demographics and School Proficiency – School proficiency thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 10 Demographics and Job Proximity – Job proximity thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 11 Demographics and Labor Market Engagement – Labor engagement thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 12 Demographics and Transit Trips – Transit proximity thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 13 Demographics and Low Transportation Costs – Low transportation cost thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 14 Demographics and Poverty – Low poverty thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps and R/ECAPs

Map 15 Demographics and Environmental Health – Environmental health thematic map for Jurisdiction and Region with race/ethnicity, national origin, and familial status maps with R/ECAPs

Map 16 Disability by Type – Population of persons with disabilities dot density map by persons with vision, hearing, cognitive, ambulatory, self-care, and independent living difficulties with R/ECAPs for Jurisdiction and Region

Map 17 Disability by Age Group – All persons with disabilities by age range (5-17; 18-64; and 65+) dot density map with R/ECAPs for Jurisdiction and Region

APPENDIX B – HUD-Provided Tables

Table 1 Demographics – Tabular demographic data for Jurisdiction and Region (including total population, the number and percentage of persons by race/ethnicity, national origin (10 most populous), LEP (10 most populous), disability (by disability type), sex, age range (under 18, 18-64, 65+), and households with children)

Table 2 Demographic Trends – Tabular demographic trend data for Jurisdiction and Region (including the number and percentage of persons by race/ethnicity, total national origin (foreign born), total LEP, sex, age range (under 18, 18-64, 65+), and households with children)

Table 3 Racial/Ethnic Dissimilarity – Tabular race/ethnicity dissimilarity index for Jurisdiction and Region

Table 4 R/ECAP Demographics – Tabular data for the percentage of racial/ethnic groups, families with children, and national origin groups (10 most populous) for the Jurisdiction and Region who reside in R/ECAPs

Table 5 Publicly Supported Housing Units by Program Category – Tabular data for total units by 4 categories of publicly supported housing in the Jurisdiction (Public Housing, Project-Based Section 8, Other Multifamily, Housing Choice Voucher (HCV) Program) for the Jurisdiction

Table 6 Publicly Supported Housing Residents by Race/Ethnicity – Tabular race/ethnicity data for 4 categories of publicly supported housing (Public Housing, Project-Based Section 8, Other Multifamily, HCV) in the Jurisdiction compared to the population as a whole, and to persons earning 30% AMI, in the Jurisdiction

Table 7 R/ECAP and Non-R/ECAP Demographics by Publicly Supported Housing Program Category – Tabular data on publicly supported housing units and R/ECAPs for the Jurisdiction

Table 8 Demographics of Publicly Supported Housing Developments by Program Category – Development level demographics by Public Housing, Project-Based Section 8, and Other Multifamily⁴ for the Jurisdiction

Table 9 Demographics of Households with Disproportionate Housing Needs – Tabular data of total households in the Jurisdiction and Region and the total number and percentage of households experiencing one or more housing burdens by race/ethnicity and family size in the Jurisdiction and Region

⁴ Please note that, for the first year, census tract level demographic data in which publicly supported housing developments are located, also including LIHTC developments, are available through the AFFH Data and Mapping Tool which includes a data query function and ability to export tables.

Table 10 Demographics of Households with Severe Housing Cost Burden – Tabular data of the total number of households in the Jurisdiction and Region and the number and percentage of households experiencing severe housing burdens by race/ethnicity for the Jurisdiction and Region

Table 11 Publicly Supported Housing by Program Category: Units by Number of Bedrooms and Number of Children – Tabular data on the number of bedrooms for units of 4 categories of publicly supported housing (Public Housing, Project-Based Section 8, Other Multifamily, HCV) for the Jurisdiction

Table 12 Opportunity Indicators by Race/Ethnicity – Tabular data of opportunity indices for school proficiency, jobs proximity, labor-market engagement, transit trips, low transportation costs, low poverty, and environmental health for the Jurisdiction and Region by race/ethnicity and among households below the Federal poverty line.

Table 13 Disability by Type – Tabular data of persons with vision, hearing, cognitive, ambulatory, self-care, and independent living disabilities for the Jurisdiction and Region

Table 14 Disability by Age Group – Tabular data of persons with disabilities by age range (5-17, 18-64, and 65+) for the Jurisdiction and Region

Table 15 Disability by Publicly Supported Housing Program Category – Tabular data on disability and publicly supported housing for the Jurisdiction and Region

