

Analysis of Impediments to Fair Housing Choice - Update

December 2018



Table of Contents

Section One – Executive Summary

Section Two – Introduction

A. Fair Housing Act.....	3
B. Fair Housing Choice.....	4
C. Fair Housing and Affordable Housing	5
D. Project Funding and Methodology	5
E. Public Comments	6

Section Three – Community Profile

A. Demographics	7
B. Income	10
C. Employment.....	12
D. Housing.....	14

Section Four – Evaluation of Fair Housing

A. Fair Housing Complaints and Trends	19
B. Questionnaire Results	21
C. Fair Housing Discrimination Suits	25
D. Determination of Unlawful Segregation	25

Section Five – Evaluation of Public Sector Policies and Programs

A. Comprehensive Planning	26
B. Zoning Regulations	26
C. Development Fees and Incentives.....	27
D. Neighborhood Revitalization and Municipal Services.....	28
E. Public Transportation/Housing/Jobs Linkage	29
F. Housing Authority and Assisted Housing.....	30
G. Property Tax Policies	33
H. Boards and Commissions	33
I. Building Codes and Accessibility	34

Section Six – Evaluation of Private Sector Policies and Programs

A. Mortgage Lending Policies and Practices	35
B. Real Estate Practices	37

Section Seven – Evaluation of Current Fair Housing Programs and Activities

A. Current Fair Housing Programs and Activities	38
B. Other Fair Housing Organizations.....	41

Section Eight – Impediments and Fair Housing Action Plan

A. Impediments to Fair Housing Choice.....	42
B. Fair Housing Action Plan	44

Section Nine – Signature Page.....46

Section Ten – Appendix.....47

Tables

Table 1: Population and Growth Rate.....	7
Table 2: Age and Gender of Population	8
Table 3: Race and Ethnicity of Population	8
Table 4: Percent of Population by Race and Ethnicity by Census Tract	9
Table 5: Disability Status of Population	10
Table 6: Average Weekly and Annual Wages-Nine Largest Colorado Counties	10
Table 7: Weld County Average Weekly Wage and Annual Wage.....	11
Table 8: Household by Type and Income.....	11
Table 9: Poverty Rate (and 50% of Poverty Rate) by Race and Ethnicity	12
Table 10: Families and Households Living in Poverty	12
Table 11: Largest Employers Located in Greeley	13
Table 12: Housing Units and Projected Growth.....	14
Table 13: Housing Units by Type.....	14
Table 14: New Residential Construction-Number of Permits Issued	15
Table 15: Occupied Household Composition.....	15
Table 16: Tenure of Households by Race/Ethnicity-Greeley Jurisdiction (not MSA)	15
Table 17: Greeley-Evans Average Home Sales Prices	16
Table 18: Foreclosures in Weld County	16
Table 19: Average Vacancy Rate and Ren.....	17
Table 20: 40 th Percentile Fair Market Rent & Average Rent.....	17
Table 21: Housing Units by Number of Bedrooms	17
Table 22: Housing Discrimination Complaints	20
Table 23: Commuters	30
Table 24: Poverty Rates by Race, Ethnicity, Disability, Household Type	31
Table 25: Greeley Housing Authority Residents	32
Table 26: Greeley Housing Authority Waiting List Applicants	33
Table 27: Status of Home Loan Applications	36
Table 28: Status of Home Loan Applications by Race and Ethnicity.....	36
Table 29: Home Loan Denial Rate Reasons by Race and Ethnicity.....	37
Table 30: Point-in Time Survey	40
Table 31: Language Spoken at Home-Population of 5+ years of age.....	41
Table 32: Fair Housing Action Plan	44

Section One - Executive Summary

This report is the 2018 update to the City of Greeley's Analysis of Impediments to Fair Housing Choice (AI), which has been prepared to address the requirements of the Housing and Community Development Act of 1974, as amended, (the Act). Under the Act, communities receiving certain federal grants from the U. S. Department of Housing and Urban Development (HUD) are required to "affirmatively further fair housing" in compliance with the Fair Housing Act; the City receives Community Development Block Grant (CDBG) and the HOME Investment Partnership Program grant from HUD, both of which require that fair housing be affirmatively furthered.

Impediments to fair housing choice under the Act are:

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

Fourteen formal housing discrimination complaints in Greeley were filed with HUD's Office of Fair Housing and Equal Opportunity (FHEO) or the Colorado Civil Rights Division (CCRD) in Denver (which the designated Fair Housing Assistance Program (FHAP) that investigates housing discrimination complaints for HUD in Colorado) between January 1, 2013 and July 31, 2018. Ten of those complaints involved discrimination due to disability (alone or as one of the factors for the complaint). Six of the complaints had a "no cause" determination; three remained open at the time of this report.

During the month of November 2018, the City made a survey available (in English and Spanish) to gather information about fair housing discrimination. It was distributed at two events in low-income neighborhoods and by the City's Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) partner non-profit agencies. It was also available on the City's website, with notice provided through the City's online newsletter and employee website.

There were 179 surveys completed. Forty-six responded that they had experienced discrimination, 115 said they had never been discriminated against, and 20 responded with "not sure". Twelve surveys in Spanish were completed.

The reasons most cited by persons who felt they had experienced discrimination (of a protected class) were on the basis of race/color/national origin or ancestry (54% total, with race alone reported at 26%) and disability (18%). Source of income was cited by 17%, but persons with a lack of income are not a protected class under fair housing laws. None of those who said they had experienced discrimination indicated they had filed a formal complaint. The most cited place where discrimination occurred was in rental housing (44 of 77 responses).

During review of the surveys, several general observations were made: (1) People do not necessarily differentiate between what is discrimination of a protected class under the fair housing laws and what they feel is discrimination (but does not violate fair housing laws). (2) People who have not experienced discrimination generally do not see discrimination as a problem in Greeley. (3) There is a general lack of understanding of fair housing laws. Of those responding to the question about degree of knowledge, only 31 of 151 responding to the survey felt they were "very informed". Forty-five responded "not informed". Responses to questions also indicated a general lack of knowledge (i.e.

responses did not pertain to a fair housing issue). (4) The survey provided a way to express concern for all housing issues, not just ones pertaining to fair housing.

Additionally, through discussions with non-profit agency directors who work directly with populations that could be prone to discriminatory practices, it is clear that fair housing discrimination is not a regular topic of conversation, nor has it risen to the top as an issue frequently encountered. The lack of housing (for all income levels) was identified as a much greater issue in Greeley at this time. Better education on fair housing rights within the agencies who work with low-income families and housing, however, would be beneficial.

It is evident that the Greeley community works hard to foster a culture of diversity and racial tolerance. Fair housing issues, while they certainly exist, do not appear to be severe. Housing challenges for the community are more centered around factors that do not violate fair housing laws: High cost of both rental and for-sale housing; insufficient financial resources that negatively affect the ability of low-income persons to obtain housing; and the lack of housing availability for all income levels. Those factors may affect protected classes in greater numbers and contribute to the perception that discrimination has occurred.

Impediments to Fair Housing Choice

After reviewing the impediments cited in the 2013 report, statistical and demographic information, the survey results, and other information provided for the 2018 update to the Analysis of Impediments study, it was determined that there are no new impediments to fair housing in Greeley. The goals and actions of the 2013 Fair Housing Action Plan have been modestly updated and refined, and the City will continue to address them during the years 2020-2024. Impediments follow:

- 1. Discrimination due to race, color, national origin, or ancestry or disability:** Housing discrimination appears to be taking place in Greeley, particularly in rental housing, for reasons of race, ethnicity, color, national origin, or ancestry. Greeley has a high percentage of its population that identifies as of the Hispanic ethnicity or a race other than Caucasian, which increases the possibility of discrimination occurring due to these factors. Having a disability, either mental or physical, was also cited by a high percentage of persons completing the survey and in the formal complaints filed with HUD during the last five year as a reason for discrimination. Denial of reasonable accommodation and/or service animals was particularly noted as reasons the person felt discriminated against.

While being a low-income person does not provide protection under fair housing laws, the high percentage of minorities in Greeley with a low-income (reference Table 9) could create a means for veiled discrimination. Income factors should be considered a subset of the impediment. Seventeen percent of survey responses cited income as the reason they felt they had encountered discrimination. Coupled with the high number of minorities with low-income in the community, the possibility of discrimination increases for the minority populations.

- 2. Language and culture:** Language and cultural barriers to fair housing choice are an impediment. There are two primary populations for which language and cultural barriers could be considered a barrier: Hispanic person for whom English is not their first language and refugees.

Since the passage of the Refugee Act by Congress in 1980, Colorado has participated in the federal refugee resettlement program. According to the May 2018 report (“Economic and Fiscal Impact of Refugees in Colorado” by the Colorado Office of Economic Security, Greeley and Fort Morgan together account for approximately 13% of Colorado’s annual average of 1,650 new refugees added to the population. With the location of refugees and immigrants in Greeley from many nations and the high number of persons who speak Spanish, the need for translation services and a better understanding of cultural differences will not only continue to be important, but a lack could impede fair housing choice.

3. **Transportation:** Transportation is a barrier for households that do not have their own transportation, particularly if public transportation is not easily accessed.
4. **Lack of affordable housing units disproportionately affect some protected classes:** Families with children, families headed by a single-parent, households that have a disabled member, and households of Hispanic/Latino origin are residing in Housing Authority units, using Section 8 vouchers, or are on the waiting lists for assisted housing at greater rates than these populations city-wide and could benefit from additional affordable housing geared to their needs.
5. **Higher mortgage loan denial rates for Hispanic/Latino households:** The reasons behind these higher loan denial rates may not be discriminatory, but since this cannot be fully established from the available HMDA data, it is a consideration that should be noted and monitored. The City cannot control the private real estate and loan market, but it can monitor the participants in city-sponsored or funded programs, such as G-Hope and Habitat for Humanity and encourage minority ownership.

The Fair Housing Action Plan, which includes recommendations for addressing the impediments, is in Section Eight of this report.

SECTION Two - Introduction

A. Fair Housing Act

This report is the 2018 update to the City of Greeley’s Analysis of Impediments to Fair Housing Choice (AI), which has been prepared to address the requirements of the Housing and Community Development Act of 1974, as amended, (the Act). Under the Act, communities receiving certain federal grants from HUD are required to “affirmatively further fair housing” in compliance with the Fair Housing Act; the City receives Community Development Block Grant (CDBG) and the HOME Investment Partnership Program grant from HUD, both of which require that fair housing be affirmatively furthered.

Federally protected classes under the Act are race, color, religion, national origin, gender, familial status (having children in the home under the age of 18), and disability. Colorado state law also protects from discrimination based on sexual orientation, creed, ancestry, and marital status.

Under the Federal Fair Housing Act, the following are prohibited against a member of a protected class:

- In the Sale and Rental of Housing
 - Refusal to rent, sell, or otherwise negotiate for housing
 - Making housing unavailable or otherwise denying a dwelling; falsely denying that housing is available for inspection, sale, or rental
 - Setting different terms, conditions or privileges for sale or rental of a dwelling
 - Providing different housing services or facilities; denying access to, membership or participation in any organization, facility, or service (such as a multiple listing service) related to the sale or rental of dwellings; or discriminating against any person in the terms or conditions of such access, membership or participation
 - Persuading, or trying to persuade homeowners to sell or rent dwellings by suggesting that people of a particular race, etc. have moved, or are about to move into the neighborhood (blockbusting)
- In Mortgage Lending
 - Refusal to provide information regarding loans or make a mortgage loan; refusal to purchase a loan
 - Imposing different terms or conditions on a loan, such as different interest rates, points, or fees; imposing different terms or conditions for purchase of a loan
 - Discriminating in property appraisals
- In addition, it is a violation of the Fair Housing Act to
 - Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise the right
 - Make, print, or publish any statement, in connection with the sale or rental of a dwelling, which indicates a preference, limitation, or discrimination based a protected class.
 - With regard to homeowners insurance coverage: refuse to provide coverage for a dwelling; discriminate in the terms or conditions; refuse to provide available information on the full range of coverage options available; or make, print, or publish any statement, in connection with the provision of homeowners insurance coverage, that indicates a preference, limitation, or discrimination based on a protected class

B. Fair Housing Choice

Fair housing choice is defined as the ability of persons, regardless of their race, color, religion, sex, national origin, mental or physical disability or familial status to have the same housing choices available to them as people of similar income levels. (In Colorado, the protections extend to creed, ancestry, marital status, and sexual orientation, also.) Impediments to fair housing choice, then, are those actions, omissions, or decisions that are taken because of race, color, religion, sex, national origin, mental or physical disability, or familial status (plus Colorado protected classes), and which

restrict, or have the effect of restricting the availability of housing choices because someone is a member of a protected class.

The actions recommended in this report are intended to affirmatively further fair housing choice and address the issues identified as impediments with the result to

- Identify and eliminate housing discrimination in the community
- Promote fair housing choice for all persons
- Provide opportunities for racially and ethnically inclusive patterns of housing occupancy
- Promote housing that is physically accessible to and usable by all persons, particularly persons with disabilities
- Foster compliance with the provisions of the Fair Housing Act

C. Fair Housing and Affordable Housing

This report is not intended to identify barriers to affordable housing outside the context of fair housing issues. A barrier to affordable housing may also be an impediment to fair housing choice; however, the barrier must disproportionately affect members of a protected class. Because there is a large percentage of persons identifying as a minority (by either race or ethnicity) and/or low-income in Greeley, the lack of affordable housing may be an impediment to fair housing. (Refer to Map One – Census Tracts and Map Two for census tracts and the median income percentage for each tract.)

D. Project Funding & Methodology

The funding for this project was provided by the City of Greeley's CDBG and HOME grants. This report was developed using HUD's "Fair Housing Planning Guide", and the methodology used in its preparation consisted of the following steps:

- Review of existing data on demographics; income, wages, and employment; housing (rental and for sale housing); zoning and land use; City of Greeley's adopted policies and plans; and private lending and statistics
- Discussions with the agencies distributing the survey with regard to the survey's purpose and how fair housing laws could affect their clientele
- Review and analysis of housing discrimination complaint data provided by HUD
- Analysis of the results of a survey distributed through area non-profit agencies to clients and consumers and made available to the general public
- Identification of impediments
- Development of the Fair Housing Action Plan, which includes recommendations to reduce impediments

The survey noted was developed to gather input from Greeley residents to gauge perceptions of housing discrimination in the community. It was available in English and Spanish. The survey was available during the month of November 2018 on the City's website, was available at Weld Project Connect and at a parent teacher conference at an elementary school in a low-income neighborhood,

and was distributed to residents through 11 non-profit agencies that work with clientele susceptible to fair housing discrimination. Most agencies made great effort to encourage their clientele to participate. The participating non-profit agencies and City departments, as well as findings from the questionnaire, are summarized in Section Four of this report.

Additionally, information during the formulation of the report was attained (in person, by email, or from websites) from the following:

- City of Greeley Building Inspection Office
- City of Greeley Planning Division
- City of Greeley Neighborhood Resources Office
- Colorado Civil Rights Division
- Colorado Legal Services
- Greeley-Evans Transit
- The Group Real Estate
- U. S. Census – American Community Survey 2012-2018

E. Public Comments (to be updated with current information when available)

The draft of this report was released to the public on February 3, 2019. A 30-day public comment period was open, from February 3, 2019 through March 6, 2019. The draft report was also sent to all participating agencies that were interviewed and was posted on the City's website throughout the 30-day comment period.

The draft report was available to the Citizens Committee for Community Development for review. They commented that the thing that stood out was the issue housing affordability in the community.

The Greeley Urban Renewal Authority Board will review the draft at its March 13, 2019 meeting. The Greeley City Council will review the report for acceptance at the March 19, 2019 City Council meeting.

The public review process conducted for this study is in conformance with the review process outlined in the City's Citizen Participation Plan, which was adopted for inclusion with the City's 2020-2024 Strategic Consolidated Plan.

Recommendation by Greeley Urban Renewal Authority Board (will update as needed if comments are received)

- The GURA Board voted to recommend approval of Analysis of Impediments to Fair Housing Choice study.

Action by Greeley City Council

- The Council voted to accept the Analysis of Impediments to Fair Housing Choice study.

Public Comment Period

During the public comment period, the following comments were received:

- No comments from the public were received.

SECTION THREE - Community Profile

The Community Profile is an overview of Greeley's demographic and economic picture. While a variety of sources was utilized to define the community profile, most of the information came from the U. S. Census-2012-2016 American Community Survey. Much of the information is for the Greeley Metropolitan Statistical Area (MSA, which encompasses all of Weld County. Sources are noted at the bottom of the tables. Data, though often dated, is the most current available. Map One shows the locations of Greeley's Census Tracts and Block Groups, which HUD utilizes as boundaries for much of their demographic information. Map Three is the Redevelopment District, which encompasses most of the low-income neighborhoods of the City.

A. Demographics

POPULATION AND GROWTH RATE: Greeley, Colorado is the largest community in Northern Colorado's Weld County. It serves as a regional hub for many of the small agricultural communities around it.

Greeley has seen significant growth in recent years, a trend mirrored all along Colorado's Front Range. Since 2015, there has been a greater than 2% population growth annually, and since 2000, when Greeley's population was 76,930, the city has grown 40% to an estimated population in 2018 of 107,457. (The 2018 Annual Growth and Development Projections report note that in 2012 the average household size increased from 2.7 to 2.71 persons.)

Table 1: Population and Growth Rate 2010-2018

Year	Population	Growth Rate
2010	94,358*	2.8%
2011	95,517	1.2%
2012	96,093	0.7%
2013	97,320	1.3%
2014	98,423	1.1%
2015	100,790	2.4%
2016	103,037	2.2%
2017	105,315	2.2%
Projected 2018	107,457	2.2%

Source: City of Greeley 2018 Annual Growth and Development Projections Report

AGE AND GENDER: The median age in Greeley is 30.7 years, up from 29.8 in 2010 and 28.5 in 2000. Gender distribution has remained fairly constant, and the baby boomer generation and their children continue to make up the largest segments of the Greeley population.

Table 2: Age and Gender of Population

Age	Population	% of Total Population
Total Population	98,975	100%
Under 5 years	6,972	7%
5-9 years	7,699	7.8%
10-14 years	6,388	6.5%
15-19 years	9,416	9.5%
20-24 years	10,954	11.1%
25 – 34 years	13,538	13.7%
35 – 44 years	11,688	11.8%
45 – 54 years	10,557	10.7%
55 – 59 years	5,119	5.2%
60 - 64 years	4,810	4.9%
65 - 74 years	6,490	6.6%
75 - 84 years	3,748	3.8%
85 years and over	1,596	1.6%
Gender		
Females	50,393	50.9%
Males	48,582	49.1%
Median Age	30.7 years	

Source: U. S. Census 2012 – 2016 American Community Survey

RACE AND ETHNICITY: While still a minimal part of the overall Greeley population (2.4%), the African American/Black population had the largest growth. Much of this growth came from the East African refugees who settled in Greeley in the late 2000s. The Hispanic/Latino population also had a significant increase, from 29.5% in 2000 to 37.3% in 2016. During this same period, the Caucasian/White population had only a slight increase, from 80.4% to 81.7%. Non-white races represent relatively small percentages of the total population, but their increases reflect the growing diversity in the community. While Greeley has a substantially larger Hispanic/Latino population than Colorado as a whole (36.0% vs 20.7%, respectively), it has a much smaller percentage of other races. The percentage of Asian (2.8%) and African American/Black (4.0%) populations in Colorado were more than double that of Greeley.

Table 3: Race and Ethnicity of Population

Race/Origin	Pop 2010	% of Pop	% Increase Since 2000	Pop 2016	% of Pop	% Increase Since 2000
Asian	1,245	1.3%	40.7%	1,479	1.5%	67.1%
African American/ Black	1,543	1.7%	129.6%	2,376	2.4%	253.6%
Caucasian/White	73,485	79.1%	18.8%	80,899	81.7%	30.8%
Native American	1,096	1.2%	71.5%	1,001	1.0%	56.7%
Pacific Islander	111	0.1%	4.7%	136	0.1%	28.3%
Other/Mixed Races	15,409	16.6%	20.6%	13,084	13.2%	2.4%
TOTAL Population	92,889	100.0%	-----	98,975	100%	-----
Hispanic/Latino origin	33,440	36.0%	47.4%	36,967	37.3%	63.0%

Source: U. S. Census 2010 and 2012-2016 American Community Survey

RACE AND ETHNICITY BY CENSUS TRACT: Census tracts that have a racial or ethnic concentration are those tracts that have a percentage of a population at least twice the community's overall percentage for that population. For example, the Asian/Pacific Islander population citywide in 2016 was 1.6% (see Table 4 above), so a concentration would be a tract that has an Asian/Pacific Islander population of at least 3.2%. In Greeley, there are two tracts where Asian populations are concentrated (2, 10.03); three tracts with concentrations of African Americans/Blacks (1, 3, 10.03); and three tracts with concentrations of persons of Hispanic/Latino ethnicity (5.01, 5.02, 7.01). There is one tract citywide with a concentration of at least two different races or Hispanic/Latino populations (10.03). Map Four shows the racial and ethnic distribution by census tract.

Table 4: Percent of Population by Race and Ethnicity by Census Tract

Census Tract	% Asian/ Pacific Islander	% African American	%Caucasian/ White	% Native American	% Other Mixed	% Hispanic/ Latino Origin
1	0.88%	4.79%*	48.53%	1.27%	1.61%	42.91%
2	3.18%	2.89%	65.94%	0.68%	2.28%	25.04%
3	1.28%	5.03%	79.24%	0.11%	3.69%	10.65%
4.01	1.18%	0.68%	80.00%	0.58%	1.26%	16.31%
4.02	1.05%	3.34%	57.11%	0.53%	2.15%	35.82%
5.01	0.25%	0.75%	12.19%	0.33%	0.39%	86.09%*
5.02	0.34%	1.39%	23.31%	0.36%	2.07%	72.53%*
6	0.24%	1.41%	29.13%	0.92%	1.47%	66.83%
7.01	0.52%	0.96%	20.11%	0.55%	0.69%	77.18%*
7.03	0.26%	0.73%	29.04%	0.31%	0.65%	69.02%
7.04	0.0%	0.91%	56.58%	0.3%	2.42%	39.79%
8	1.33%	1.280%	55.11%	0.7%	1.23%	40.36%
9	0.57%	0.43%	64.15%	0.57%	0.73%	33.56%
10.03	4.57%*	7.40*	30.16%	0.46%	0.83%	56.58%
11	1.16%	0.89%	66.97%	0.49%	1.79%	28.70%
12.01	1.50%	0.99%	59.25%	0.65%	2.07%	35.55%
12.02	0.84%	0.52%	76.29%	0.44%	1.84%	20.09%
13	0.32%	0.85%	42.39%	0.47%	1.32%	54.69%
14.06	0.90%	0.96%	74.35%	0.40%	1.41%	21.98%
14.07	2.07%	0.78%	84.01%	0.16%	1.03%	11.95%
14.08	0.98%	0.98%	82.84%	0.39%	2.20%	12.61%
14.09	1.82%	0.64%	75.74%	0.29%	1.41%	20.11%
14.10	0.92%	0.50%	89.39%	0.27%	1.14%	7.81%
14.11	1.64%	0.78%	79.20%	0.25%	2.35%	15.78%
14.12	1.21%	0.30%	82.37%	0.13%	1.31%	14.68%
14.13	1.42%	0.71%	68.12%	0.90%	1.22%	27.64%
14.14	1.35%	0.37%	78.35%	0.19%	1.20%	18.54%
14.15	2.14%	0.46%	76.61%	0.21%	1.55%	19.03%
14.16	1.45%	0.67%	84.61%	0.30%	1.73%	12.10%
14.17	0.94%	0.46%	66.35%	0.53%	1.04%	30.69%

Source: Affirmatively Furthering Fair Housing Mapping Tool Version 4

DISABILITY: The 2012-2016 American Community Survey estimates for persons with disabilities increased only slightly from those of 2007-2011 (from a total population with a disability of 10,317 to 10,838). War veterans returning home with disabilities are primarily in the 18-40 year range, so the number of people with disabilities within this age group may see increases. The same is true for the older age groups.

Table 5: Disability Status of Population: 2012-2016

Status	Number
Total population	96,989
Under 18/20 years	25,156
With a disability	833
18/21 - 64 years of age	60,476
With a disability	5,712
65 years and over	11,357
With a disability	4,293
Total Population with a Disability	10,838

Source: U. S. Census 2012-2016 American Community Survey

B. Income

Average weekly wages in the Greeley MSA have increased by approximately 15.8% since 4th quarter of 2012. The average weekly wage for the Greeley MSA in the fourth quarter of 2017 was \$962, compared to \$831 at the end of 2012. In contrast, the nationwide average at the end of 2017 was \$1,109; the Colorado average was \$1,133. Despite the increase in wages since 2012, Weld County (which is the Greeley MSA) had the lowest weekly wage of the nine largest Colorado counties.

Table 6: Average Weekly and Annual Wages, Nine Largest Colorado Counties: 4th Quarter 2017

Area	Average Weekly Wage	Average Annual Wage
United States	\$1,109	\$57,668
Colorado	\$1,133	\$58,916
Weld County	\$962	\$50,024
El Paso County	\$967	\$50,284
Larimer County	\$1,011	\$52,572
Adams County	\$1,133	\$58,916
Jefferson County	\$1,112	\$57,824
Arapahoe County	\$1,268	\$65,936
Boulder County	\$1,277	\$66,404
Douglas County	\$1,314	\$68,328
Denver County	\$1,334	\$69,368

Source: Bureau of Labor Statistics-Mountain-Plains Region

The economy in the Greeley MSA is specialized in mining, quarrying, oil and gas extraction; agriculture, forestry, fishing, hunting; and construction. Employment in those areas is 8.13%, 2.79%, and 1.55% (respectively), which are higher than what would be expected in a location of the same size. The largest industries are retail trade, health care and social assistance, and manufacturing.

Table 7: Weld County Weekly and Annual Wages – 4th Quarter 2017

Industry	Average Weekly Wage	Average Annual Wage
Accommodation and Food Services	\$349	\$18,173
Education Services	\$577	\$30,020
Retail Trade	\$672	\$34,938
Admin., Support, Waste Mgm., Remediation	\$699	\$36,369
Public Administration-Government	\$917	\$47,677
Health Care and Social Assistance	\$1,041	\$54,144
Construction	\$1,164	\$60,532
Manufacturing	\$1,176	\$61,155
Wholesale Trade	\$1,451	\$75,429
Mining, Quarrying, and Oil and Gas Extraction	\$1,861	\$96,786

Source: Employment Services of Weld County, 4th Quarter 2017, Data Set Esri Q4 2017

The Area Median Income (AMI) in the Greeley MSA (as provided by HUD) rose to \$89,875 in 2018 after dropping to \$66,300 in 2013. These figures are based on a family size of four persons. The percentage of owner-occupied units starts to exceed the percentage of renter-occupied households at the \$50,000-\$74,999 income mark and continues as incomes rise.

Table 8: Household by Type and Income – 2012-2016

Income range	Occupied Units	% of Occupied Units	Owner-occupied	% Owner-occupied	Renter-occupied	% Rented-occupied
Total	34,319	100%	19,675	100%	14,644	100%
Less than \$5,000	1,407	4.1%	315	1.6%	1,098	7.5%
\$5,000-\$9,999	1,167	3.4%	275	1.4%	893	6.1%
\$10,000-\$14,999	1,888	5.5%	590	3.0%	1,289	8.8%
\$15,000-\$19,999	1,888	5.5%	689	3.5%	1,201	8.2%
\$20,000-\$24,999	2,025	5.9%	469	3.3%	1,377	9.4%
\$25,000-\$34,999	3,603	10.5%	1,633	8.3%	1,948	13.3%
\$35,000-\$49,999	5,011	14.6%	2,240	12.3%	2,592	17.7%
\$50,000-\$74,999	6,932	20.2%	4,269	21.7%	2,651	18.1%
\$75,000-\$99,999	4,256	12.4%	3,443	17.5%	835	5.7%
\$100,000-\$149,999	4,050	11.8%	3,482	17.7%	571	3.9%
\$150,000 or more	2,093	6.1%	1,903	9.7%	190	1.3%
FY 2016 (family of four) Area Median Income:		\$73,375				
30% of AMI		\$22,000				
50% of AMI		\$36,700				
80% of AMI		\$58,700				

Source: U. S. Census 2012-2016 American Community Survey; U. S. Dept. of Housing and Urban Development (AMI)

Approximately 17,701 households earn less than 30% AMI, which is considered poverty-level income. Poverty rates were higher for all minorities than for those of the Caucasian race and were highest for households of the African American/Black race (47.2%), followed by those who identified as “some other race” (34.3%), and those identifying as Asian (28.5%). (See also Map Five-Demographics and Poverty.)

Table 9: Poverty Rate (and 50% of Poverty Rate) by Race and Ethnicity – 2012-2016

Race/Ethnicity	Population Estimate	% Below Poverty Level	% Below 50% of Poverty Level
White	75,837	15.9%	8.3%
Black/African American	2,106	47.2%	19.3%
American Indian/Alaska Native	927	24.2%	12.8%
Asian	1,391	28.5%	13.6%
Native Hawaiian/Pacific Islander	109	0.0%	0.0%
Some other race (alone)	9,651	34.3%	17.2%
Two or more races	2,965	24.7%	14.3%
Hispanic or Latino	35,409	23.0%	11.1%

Source: U. S. Census 2012 – 2016 American Community Survey

Poverty in 2018 was a household income of less than \$12,140 for one person and \$23,018 for a 4-person household. While the percentage of all people over the age of 18 living in poverty dropped from 20% (2007-2011) to 17.5% (2012-2016), female head-of-households with children under age five increased fairly significantly (from 59.7% in 2007-2011 to 65.4% in 2012-2016).

Table 10: Families and Households Living in Poverty

Family Type	% Living in Poverty
All Families	13.3%
w/children under 5 years of age	25.5%
Married Couple Households	6.2%
w/children under 5 years of age	7.6%
Female Headed Households	37%
w/children under 5 years of age	65.4%
Under 18 years of age	23.4%
w/children under 5 years of age	28.8%
18 years and over	17.5%
18 – 64 years of age	9.4%
65 years and over	9.4%

Source: U. S. Census 2012 – 2016 American Community Survey

C. Employment

The unemployment rate for the Greeley MSA for 2017 averaged 2.7%, compared to 7.9% in 2012. Through August 2018, the rate had risen slightly to 2.8%. (Greeley MSA rates are not seasonally adjusted.) The Colorado unemployment rate (seasonally adjusted) in 2017 averaged 2.8% and at the end of August 2018 was averaging 2.9%. These rates compare with the national rates (seasonally adjusted) of 8.1% (2012 average) and 4.4% (2018 average through August).

The 2012-2016 American Community Survey Five-year Estimates showed a Greeley civilian labor force comprised of those over the age of 16 numbering 48,575, which was an increase from the 2010 estimate of 46,355 people.

The Greeley MSA repeatedly led the country in job growth during 2013-2014 and had an 8.8% gain in the third quarter of 2014, due in large part to jobs created by oil and gas production. Within a year of that, when oil and gas prices fell significantly, Weld's ranking was among the bottom of the large counties for which job growth is tracked. Reports from the third quarter of 2017 showed the Greeley MSA again with good job growth (5%), outpacing all but two other large counties in the country, predominantly driven by increases once again in jobs in the oil and gas production industry.

The largest employers located in Greeley represent a variety of industries, as noted in the table below.

Table 11: Largest Employers Located in Greeley: 2017

Employer	# Employees	Industry Type
JBS Swift & Company	4,520	Beef processing
Banner Health: North Colorado Medical Center	3,069	Healthcare
Greeley-Evans School District 6	1,923	Education
University of Northern Colorado	1,623	Education
Weld County	1,615	Government
State Farm Insurance	1,400	Insurance
City of Greeley	812	Government
TeleTech Services Corporation	780	Financial services support
Noble Energy District Center	500	Oil & gas development
Leprino Foods	442	Food production
North Range Behavioral Health	362	Healthcare
Aims Community College	337	Education
Hensel Phelps Construction Company	315	Construction
Mountain States Lamb Coop	307	Sheep raising/processing
Colorado Premium Foods	280	Food processing

Source: Upstate Colorado Economic Development-Major Employers List

Professionals in the fields of banking, health care, real estate, and management, along with governmental officials, attending the Northern Colorado Economic Forecast in January 2018 predicted that the Northern Colorado economy would continue to rise in 2018, despite slowed growth across the state. The anticipation was that Northern Colorado, because of the diversity in industries and rebounding oil and gas prices, would remain one of the hottest performing areas economically. (Weld County produces about 90% of the state's oil and gas and is the largest natural gas county in the state.)

The Weld County Department of Human Services operates the Employment Services office in Greeley, providing comprehensive work force services to those seeking employment. These services are offered to all residents of Weld County. The Weld County government offices (including social and employment services) are located in North Greeley, accessible by bus and close to the Guadalupe Community Center (homeless shelter). Many area non-profit agencies also provide skills training and/or assistance that are specific to their clients and consumers as they look for employment, including Connections for Independent Living and the Greeley Transitional House, which are both

located in downtown Greeley on the bus routes. The Weld Project Connect event also provided employment assistance through referrals to persons that attended that annual event.

D. Housing

GROWTH IN HOUSING: Since 2013, 3,035 new housing units have been constructed in Greeley, many of which were multi-family units. The City projects continued steady growth in the number its housing units, with multi-family units expected to be a majority of those constructed. More than 300 building permits (including both single- and multi-family) for new units had been issued as of November 30, 2018.

Table 12: Housing Units and Projected Growth: 2013 - 2018

Year	Number of Housing Units	Growth Rate %
2013	36,324	0.27%
2014	36,832	1.40%
2015	37,410	1.57%
2016	38,351	2.52%
2017	38,912	1.46%
2018	39,359	1.15%

Source: City of Greeley 2018 Annual Growth and Development Projections Report

SINGLE- VS MULTI-FAMILY HOUSING UNITS: The majority of housing units in Greeley (63.57%), are single-family units, based on the City of Greeley's 2018 Annual Growth and Development Projections report. The number of multi-family units available has increased significantly since 2013, in part due to the availability of CDBG-DR grant availability following the severe flood event in 2013. Low vacancy rates in multi-family units have continued and have fueled interest in the construction of additional multi-family units.

Table 13: Housing Units by Type – 2013-2018

Year	# of SF Units	% of Total Units	# of MF Units	% of Total Units	Total Units
2013	23,743	65.36%	12,581	34.64%	36,324
2014	23,976	65.10%	12,856	34.90%	36,832
2015	24,221	64.74%	13,189	35.26%	37,410
2016	24,670	64.33%	13,681	35.67%	38,351
2017	24,910	64.02%	14,002	35.98%	38,912
2018	25,021	63.57%	14,338	36.43%	39,359

Source: City of Greeley 2018 Annual Growth and Development Projections Report

During the recession years of 2008-2012, the total number of building permits issued was 359. That five-year total was exceeded in 2013, when 430 permits were issued, and the number continued to increase in 2014 and 2015. As noted above, multi-family permits increased with the availability of CDBG-DR funds, but single-family permit issuance also increased, as families and builders recovered from the recession that caused the housing market collapse in 2008-2012.

Table 14: New Residential Construction-Number of Permits Issued – 2008-September 2018

Year	Single-Family Units	Multi-Family Units	Total Units from Permits Issued
2008	60	29	89
2009	46	0	46
2010	80	5	85
2011	35	7	42
2012	55	42	97
2013	155	275	430
2014	361	428	789
2015	449	492	991
2016	244	333	577
2017	111	238	349
TOTAL	276	83	359 2008-2012; 3,136 2013-2017
Thru 9/30/18	234	138	372 YTD

Source: City of Greeley Building Division Construction Reports, 2008 – 2013; 2013-2018

OCCUPANCY: American Community Survey data for 2012-2016 estimates substantial increases in single-parent households, with female-head-of-households increasing 16.35% and male-head-of-households increasing 8.25%. There was a decline in non-family households of 3.18%.

Table 15: Occupied Household Composition: 2012-2016

Household Type	2012-2016	Percent Change
Married couples	16,250	4.17%
Female-headed single parent	4,525	16.35%
Male-headed single parent	1,955	8.25%
Non-family households	11,589	-3.18%
Total Households	34,319	3.17%

Source: U. S. Census 2012 – 2016 American Community Survey

Owner-occupied households declined slightly from 58.7% of all households (2007-2011 ACS) to 57.3% (2012-2016 ACS). With the exception of Caucasian/White and Asian households, people of other races and ethnic groups tend to occupy rental units, rather than owner-occupants units.

Table 16: Tenure of Households by Race/Ethnicity – Greeley Jurisdiction (not MSA): 2010

Race/Ethnicity	% Owner	% Renter
African American/Black	0.29%	3.55%
Asian or Pacific Islander	0.96%	1.32%
Caucasian/White	77.18%	57.63%
Native American	0.35%	0.70%
Other Race	0.48%	1.74%
Hispanic/Latino	20.74%	35.03%
TOTAL # of Units	18,730	14,375

Source: HUD Affirmatively Furthering Fair Housing Tool, Version 4; Table #16

SALES OF HOUSING: The average homes sales price in the Greeley-Evans area dropped in 2009, but has continued to rise since. Double-digit percentage increases have occurred yearly since 2012, with the exception of a 9% increase in 2013. During the second quarter of 2018, the average sales price for the Greeley-Evans area was \$338,335. A ten-year look at sales prices is provided below.

Table 17: Greeley-Evans Average Home Sales Prices – 2008-2017

Year	Average Price	Percent Change	Homes Sold
2008	\$150,735	---	1,662
2009	\$139,410	-8%	1,671
2010	\$142,181	+2%	1,522
2011	\$142,158	0%	1,461
2012	\$162,078	14%	1,490
2013	\$177,192	9%	1,944
2014	\$202,215	14%	2,280
2015	\$224,556	11%	2,450
2016	\$252,966	13%	2,480
2017	\$277,869	10%	2,162

Source: The Group, Inc. Real Estate Insider

FORECLOSURES: Foreclosure filings dropped by nearly half between 2012 and 2013, as the housing market in Greeley rebounded. In 2017, the number of foreclosures filed fell to the lowest number in eight years. There was a slight uptick in filings in 2018, but the number of foreclosure sales continued to decline.

Table 18: Foreclosures in Weld County – 2009-October 2018

Year	Foreclosure Filings	Sales of Foreclosed Homes
2009	3,354	1,615
2010	2,757	1,721
2011	1,919	1,270
2012	1,579	938
2013	820	525
2014	602	295
2015	427	194
2016	411	131
2017	362	75
2018	375	52

Source: Weld County Public Trustee

RENTS: The average rent for a two-bedroom (1 bath) apartment rose to \$916 by spring of 2018, and the average vacancy rate for all apartments was at 1.3% (1st quarter 2018; 2.2% average for all of 2017). Vacancy rates under 5.0% mean competition for rental units is very high.

Table 19: Average Vacancy Rate and Rent: 2013-2018

Year	Average Vacancy Rate	Average Rent: 2 BR, 1BA Apartment
2013*	3.3%	\$682
2014**	3%	\$736
2015**	3%	\$808
2016**	3.75%	\$853
2017**	2.2%	\$916
2018**	1.3% (1 st Qtr. Only)	\$951.95 (1 st Qtr. Only)
Source: Colorado Multi-Family Housing Vacancy & Rental Survey First Quarter 2018		

HUD annually publishes Fair Market Rents (FMR) by for each unit size. FMRs are the maximum amount a Section 8 voucher holder is allowed to pay for rent plus all utilities (excluding telephone, cable/satellite TV, internet service). The HUD FMRs for fiscal year 2018 were lower than the average area rent for all but three-bedroom units (according to the Colorado Multi-Family Housing Vacancy and Rental Survey), which has created problems for vulnerable renters utilizing Section 8 vouchers. Property owners may be able to charge a higher rent than the FMR allowed for voucher holders, which could cause the voucher holders to lose their rental in a tight housing market.

Table 20: 40th Percentile Fair Market Rent & Average Rent: 2018

Unit Type	Fair Market Rent	Average Monthly Rent*
Efficiency	\$625	\$675
1-Bedroom	\$744	\$983
2-Bedroom	\$937	\$951
3-Bedroom	\$1,363	\$1,286
4-Bedroom	\$1,275	Not Available
Sources: HUD Fair Market Rents FY 2018; CO Multi-Family Housing Vacancy & Rental Survey 1st Qtr. 2018*		

HOUSING SIZE: Of the 36,061 housing units identified in the 2012-2016 American Community Survey, 21,667 of those were one-unit detached (single-family house). The most common size of housing unit in Greeley is the three-bedroom unit, most of which are found in single-family residences, as are four or more bedrooms. Two-bedroom units are the most common apartment size, which can make it difficult for large families to find an apartment rental.

Table 21: Housing Units by Number of Bedrooms – 2012-2016

Number of Bedrooms	# of Housing Units of Corresponding Size	% of Housing Units
0 bedrooms	2,336	3.4%
1 bedroom	3,282	9.1%
2 bedrooms	9,116	25.3%
3 bedrooms	11,337	31.4%
4 bedrooms	7,426	20.6%
5+ bedrooms	3,675	10.2%
TOTAL	36,061	100%
Source: U. S. Census 2012 – 2016 American Community Survey		

HOUSING AFFORDABILITY: The highest rents for multi-family units are in the newer areas of West Greeley, as well as areas in and around the University of Northern Colorado. Rents are lowest in Census Tracts 4.02 (near downtown); 10.02 (near the Greeley Mall), and 13.0 (North Greeley).

As earlier mentioned, CDBG-DR funds became available following the 2013 flood and resulted in a number of new affordable apartment complexes, including Guadalupe Apartments (permanent supportive housing units), Mission Village, Porter House Apartments, and Peakview Trails Apartments. (Mission Village is a 50-unit development of townhouses and cottages. Units have two, three, or four bedrooms. Porter House Apartments is a 100-unit development of one, two, and three-bedroom apartments. Peakview Trails is a development for seniors (age 62+) with 64 one-bedroom and 32 two-bedroom units.) All used Low-Income Housing Tax Credits for financing, in addition to the CDBG-DR funds.

Accessible Space, Inc. (ASI) owns and operates two locations of housing units for persons with disabilities. Fox Run has 23 apartments, and Twin Rivers offers 17 units. ASI also developed Chinook Wind Apartments, which provides 60 units for seniors that also has accessible units. These three developments are in West Greeley. Other housing for persons with disabilities includes Hope Apartments and Stephens Farm sites operated by the Greeley Center for Independence. Accessible housing operated by the Housing Authority can be found at the 17th Avenue and 28th Street locations in Central Greeley. Accessible housing is also found in downtown at senior housing locations. North Range Behavioral Health has multiple options for housing for persons with mental illnesses. (Reference Map Six for locations of housing affordable to persons 50% and less of Area Median Income.)

Like with rental housing, the newer for-sale housing is located in West Greeley, and sales prices of housing are typically higher there. Density is also greater in the newer developments where there are no alleys, and smaller lot sizes are more common. The Greeley Area Habitat for Humanity will complete its third development of housing in 2019 and provides for the most affordable for-sale housing in the community. Buyers must meet certain criteria, including that the household income is less than 80% of the Area Median Income. Because of zero-interest first mortgages under the Habitat model, the Habitat developments provide homeownership opportunities to households who otherwise would not be able to purchase a home. Habitat has completed 100+ homes in its 30-year life in the Greeley community.

SUPPORT FOR HOUSING: The City of Greeley has incentives for encouraging the retention of existing housing in the Redevelopment District with flexibility in Building Code requirements where existing housing units are in a mixed-use, older building. Reductions in parking requirements are also available for affordable housing developments. Neighborhood park fees are waived for residential redevelopment in the Central Zone of the Redevelopment District. GURA operates the Housing Rehabilitation program, which assists low and moderate-income homeowners in making improvements to meet City Code or for increased energy efficiency. The City is also a recipient of the HOME Investment Partnership Program grant, all of which must be used in support of low-income housing.

ANTI-DISPLACEMENT AND RELOCATION: The City of Greeley has adopted and uses an Anti-Displacement and Relocation Assistance Plan that requires reasonable steps be taken to minimize

displacement of people from their homes for a project assisted with federal funds. Included is the replacement of all occupied and vacant “low/moderate-income dwellings” that are converted to any other use, or are demolished for a project. Relocation assistance is provided to low/moderate-income households that are displaced as a direct result of the conversion of a low/moderate-income dwelling or the demolition of any housing for an assisted project. If federal funding is used for an activity that results in displacement, the City will require that the low/moderate-income housing units be replaced within three years. Steps will be taken to minimize the direct/indirect displacement of people from their homes by coordinating code enforcement and rehab standards to prevent undue financial burden on owners and tenants; stage rehabilitation to allow tenants to remain in their housing; arrange for temporary housing when needed; identify and mitigate displacement resulting from intensive public investment in neighborhoods; and provide reasonable protections for tenants faced with conversion of their housing to a condominium or cooperative. Assistance to persons who are displaced will include housing counseling and referrals to comparable housing and relocation benefits and moving expense payments for each household displaced.

SECTION FOUR – Evaluation of Fair Housing

A. Fair Housing Complaints and Trends

In Colorado, housing discrimination complaints are filed with HUD’s Office of Fair Housing and Equal Opportunity (FHEO) or the Colorado Civil Rights Division (CCRD) in Denver. CCRD is the designated Fair Housing Assistance Program (FHAP) that investigates housing discrimination complaints for HUD in Colorado.

Between January 1, 2013 and July 31, 2018:

- A total of 14 housing discrimination complaints were filed involving persons living in Greeley
- Those whose complaint basis was “disability” had the highest number, with six reporting that as the only issue.
 - Another four cited “disability” with another basis for complaint:
 - Disability and religion (1)
 - Disability, national origin, and retaliation (1)
 - Disability, race, and retaliation (1)
 - Disability and retaliation (1)
- Other complaint bases were national origin (1), sex (2), and retaliation (1).
- Six of the complaints were closed with a “no cause determination”, and three remain open. Additional closure determinations included conciliation/settlement successful (2), complaint withdrawn by complainant after resolution (1), Fair Housing Assistance Program (FHAP) judicial consent order (1), and complaint withdrawn by complainant without resolution (1).

A summary of data regarding the housing discrimination complaints follows:

Table 22: Housing Discrimination Complaints: FY 2013-2018

Year	#	Basis/Issues	Status
2013	2	1 Disability (discriminatory terms, conditions, privileges, or services and facilities; otherwise deny or make housing available; failure to permit reasonable modification; failure to make reasonable accommodation)	1 Conciliation/settlement successful
		1 Religion, disability (discrimination in terms/conditions/privileges relating to rental; otherwise deny or make housing available; discriminatory acts under Section 818 (coercion); failure to permit reasonable modification; failure to make reasonable accommodation)	1 No cause determination
2014	1	National Origin (discriminatory refusal to rent; discrimination in terms/conditions/privileges relating to rental)	1 Complaint withdrawn by complainant after resolution
2015	3	3 Disability (including discriminatory refusal to rent; discriminatory terms, conditions, privileges, or services and facilities; discrimination in terms/ conditions/privileges relating to rental; otherwise deny or make housing unavailable; failure to make reasonable accommodation)	1 Fair Housing Assistance Program judicial consent order
			1 Conciliation/settlement successful
			1 No cause determination
2016	0	-----	-----
2017	5	2 Sex (Discriminatory refusal to rent; discrimination in terms/conditions/privileges relating to rental; otherwise deny or make housing unavailable; other discriminatory acts; discriminatory acts under Section 818 (coercion)	1 No cause determination
			1 Complaint withdrawn by complainant without resolution
		1 Disability (discrimination in terms/ conditions/privileges relating to rental; failure to make reasonable accommodation)	1 No cause determination
		1 National origin, disability, retaliation (discriminatory terms, conditions, privileges, or services and facilities; discriminatory acts under Section 818 (coercion); failure to permit reasonable modification; failure to make reasonable accommodation)	1 No cause determination
2018 – Partial year (Jan-July)	3	1 Retaliation (discriminatory terms, conditions, privileges, or services and facilities; discriminatory acts under Section 818 (coercion)	1 Remains open pending investigation
		1 Race, disability, retaliation (discriminatory terms, conditions, privileges, or services and facilities; otherwise deny or make housing unavailable; failure to make reasonable accommodation)	1 No cause determination
		1 Disability (Discriminatory acts under Section 818 (coercion); failure to make reasonable accommodation)	1 Remains open pending investigation
		1 Disability, retaliation (discriminatory terms, conditions, privileges, or services and facilities; otherwise deny or make housing unavailable; failure to make reasonable accommodation)	1 Remains open pending investigation

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

*Note: there is often more than one issue given on complaints, which means that the issue column may exceed the number of complaints actually received.

The 2013 Analysis of Impediments to Fair Housing noted that complaints filed in Greeley during the prior decade tended to reflect an increased number of complaints related to (particularly physical) disabilities; this trend continued during 2013-2018.

B. Survey Results

To gather additional information about whether housing discrimination occurs in Greeley, a survey (in English and Spanish) was distributed during the month of November by the City (online on the City's website and through City divisions) and local non-profit agencies. The non-profit agencies are/have been CDBG and/or HOME partners and work with people who are at risk of housing discrimination. The agencies (and City divisions) through which surveys were distributed are noted below; not all had surveys completed.

- A Woman's Place (shelter and services for survivors of domestic violence)
- Catholic Charities Northern – Guadalupe Community Center/Cold Weather Shelter (shelter and services for homeless persons)
- Catholic Charities - Migrant and Farm Labor Housing – Plaza del Milagro & Plaza del Sol
- City of Greeley Community Engagement Division (distributed survey at District Six parent teacher conference)
- City of Greeley Urban Renewal Authority (distributed survey at Weld Project Connect)
- Connections for Independent Living (services and advocacy for persons with disabilities)
- Greeley Center for Independence (housing and services for persons with disabilities and that are elderly)
- Greeley Habitat for Humanity (housing for low-income persons)
- Greeley Housing Authority
- Greeley Transitional House (shelter and services for homeless families)
- Immigrant and Refugee Center of Northern Colorado
- North Colorado Health Alliance (services for at-risk persons)
- North Colorado Veteran Resource Center
- Senior Resource Services (transportation service for elderly)

One hundred seventy-nine (179) surveys from Greeley residents were returned. The majority of those responding had not or were unsure if they had experienced discrimination (115/20 respondents, respectively).

Those taking the survey could provide a response to whether they felt discrimination occurs in Greeley in two ways: (1) as a person who had been discriminated against or (2) as a person who had not experienced discrimination, but believes it occurs in Greeley. Approximately 25% of the respondents said they had experienced discrimination and cited a number of reasons, including ones not associated with discrimination against a protected class. The surveys revealed that people believe they have been denied housing as a protected class on the basis of disability, family size/type, race/color, national origin, gender, marital status, and creed.

Although 47 people believe they experienced housing discrimination in Greeley, none filed a housing discrimination complaint. The reasons why included feeling it was too much trouble (9); fear of

retaliation (10); not knowing where to file a complaint (13), and not believing that filing a complaint would make a difference (16). The information gathered by the survey shows that more instances of housing discrimination might be occurring in the community than what is reported to HUD or CCRD.

Survey questions and responses are provided below:

Q1: Identify the ZIP code of your residence.

Zip Code	# of surveys returned	
80631	126	
80634	53	
Outside Greeley	17	Not counted in results

Q2: Have you ever encountered any form of housing discrimination in Greeley?

Response	# of responses
Yes	46
No	115
Not Sure	20

Q3: If yes, which of the following best describes the person responsible for discriminating against you?

Response	# of responses	
Landlord or Property Manager	49	
Real Estate Agent	7	
Lending Institution	3	
Other	9	
Neighbors/other tenants	2	
Shelter housing director	1	
Shelter	1	
Businesses	1	Not a fair housing issue
Marked every place possible	1	
Parking manager (not enough spaces)	1	Not a fair housing issue

Q4: Which of the following best describes the location where the act of discrimination occurred?

Response	# of responses
An apartment complex	40
A single-family neighborhood	12
A condo or townhouse development	6
A trailer or mobile home park	7
A public or subsidized housing project	4
When applying for a loan	2
Other	7
Marked every place possible	1
Elderly housing	1
Shelter	1
Downtown/businesses	2
Shelter housing director	1

Q5: Please explain how you believe you were discriminated against:

Responses
Comment about people smoking everywhere.
"Always get turned down."
Mental disability (3); physical disability (4). Wouldn't allow service animal. (3) No accommodation (1)
Not enough income/credit (6)/don't want lower class tenants or people with certain job types (tattoo artist) (2).
Family too large. (4) Lack of housing for single person that is safe and affordable.
Because of race/ethnicity and language. (7)
Comment about not having enough parking spaces.
Lack of education (school).
Complained of health/safety issue(s) and was evicted. (7)
In a subsidized housing program – told to get a job and get off government assistance. (2)
Lack of transportation.
"Threats. Took much stuff in one bedroom."
Homeless-old rental history. (5)
Lack of sobriety.
Increase in rent. (3)
No phone, computer illiterate so cannot get a job or housing.
Age. (3)
Criminal history (2)

Q6: On what basis do you believe you were discriminated against? Check all that apply:

Response	# of responses
Race	22
Color	9
National Origin	11
Ancestry	3
Religion	1
Creed	4
Source of Income (i.e. welfare)	17
Family status (e.g. due to children)	8
Marital Status	5
Disability	15
Sexual Orientation	3
Gender	3
Age	26
Other	13
See above for "other"	

Q7: Did you report the incident?

Response	# of responses
Yes	7
Who did you contact?	
“Authority”	
Landlord/support groups/meetings	
My case manager	
No	47
If no, why not?	
Don’t know where to report	13
Afraid of retaliation	10
Too much trouble	9
Don’t believe it makes a difference	16
Other	3
Do not believe in “telling on” people.	
We try to talk. “They” do not do anything.	
Not enough money for lawyer. (2)	

Q8: Have you ever been denied “reasonable accommodation” (flexibility) in rules, policies, or practices that you required to accommodate a disability related to housing?

Response	# of responses
Yes	16
No	127
If yes, what was your request?	
Provide additional entrance lighting.	
“A little more time to work on volunteer hours. It’s hard with no car or sitter.”	
“ADA violations: Reasonable accommodations/modifications to make home more accessible and safe for persons with disabilities.”	
“Minimal stairs leading to/from/within my apartment while recovering from a broken neck.”	
Bath tub/shower bars.	
Could not operate sliding glass door.	
Physical disabilities with the lack of financial disability support.	

Q9: Other than those noted in item six, are there other factors that limit your housing options in Greeley? Check all that apply.

Response	# of responses
Language barriers	22
Lack of housing units	44
Lack of affordable housing	73
Lack of public transportation	49
Income/credit score	10
Housing codes/occupancy limits	5
Lack of accessible housing	27
Community perceptions (of income level, my race/ethnicity, of persons requiring affordable housing, etc.)	36

Q10. How informed are you about housing discrimination laws?

Response	# of responses
Very well informed	31
Somewhat informed	30
A little informed	45
Not at all informed	45

Q11. Do you believe there housing discrimination occurs in Greeley and, if so, what types of discrimination problems do you think are the worst? (People who were not personally discriminated against could respond here. Responses are listed in groups with similar responses with the number of responses for that group noted. Not all responses were discrimination-related, but are none-the-less included below.)

Responses
*Discrimination by against people due to their race/ethnicity/color/national origin/language. (29)
Discrimination by income levels/class of people. (21)
*Discrimination against persons with disabilities, mental or physical, including the need for service animals and/or reasonable accommodation. (13)
*Discrimination due to family size or situation (i.e. large family, single person, adult kids living with parents) (5).
Discrimination against people due to their age. (5)
Discrimination due to one person's perception of another person. (4)
Discrimination due to criminal history. (4)
Housing costs are too high/there is not enough housing (affordable, accessible, general). (3)
*Discrimination against the LGBTQ community. (2)
*Discrimination due to a person's religion.
All means of discrimination occur.
Discrimination due to homelessness.
More education on fair housing is needed.
Note: (*) Denotes a protected class; could result in a fair housing issue.

C. Fair Housing Discrimination Suits

While there are three "open pending investigation" cases, there currently are no pending housing discrimination lawsuits involving the City of Greeley.

D. Determination of Unlawful Segregation

There are no known unlawful segregation lawsuits or court orders that have been filed or are pending against the City of Greeley.

SECTION Five – Evaluation of Public Sector Policies and Programs

A. Comprehensive Planning

The City's Comprehensive Plan (the Plan) was updated in 2018 and adopted the following vision statement:

"Greeley values and respects the diversity of its people, cultures, neighborhoods, and resources in a manner that creates and sustains a safe, unique, united, vibrant, and rewarding place in which to live, work, learn, grow, and play. The community promotes a healthy and diverse economy and a high quality of life that is responsive to all its residents, businesses, and neighborhoods."

The Plan encourages a variety of residential densities, from 1-3 units per net acre, up to more than 25 units per net acre. Higher density residential areas are intended to be located where services such as shopping, recreation and employment are close. Land use policies are also intended to protect established neighborhoods; provide a mix of housing types in a single development; create "complete neighborhoods" where all services and modes of transportation are available; and provide code enforcement and monitoring of established neighborhoods to limit negative "broken window" impacts (weeds, trash, inoperable vehicles) and identify when "at-risk" conditions warrant City attention to prevent neighborhood decline.

Redevelopment policies, included in the Plan, encourage the retention of Downtown as the community focal point; encourage stability and reinvestment in established areas and distinct neighborhoods; promote neighborhoods with a full complement of housing, neighborhood commercial, recreational, schools and related activities; and address conditions that contribute to disinvestment and blight in established areas of the community. The Plan identifies outdated regulations that encourage "greenfield development" as a challenge to redevelopment. Action items include updates to regulations tailored to the unique character of developed areas in need of reinvestment and the creation of neighborhood plans with site-specific policies and implementation strategies.

B. Zoning Regulations

Greeley's zoning regulations define "family" as a person living alone; as those related by blood, marriage, or adoption; or a maximum of two unrelated adults and their children. A "family" can legally share dwelling units, whether in multi-family development or a single-family home (detached or attached). For multi-family units containing three or more units, the number of unrelated adults is based on the City's Housing Occupancy Standards, which limit the number of people based on minimum area requirements.

Most communities limit the number of unrelated persons in a dwelling unit to avoid the conditions of overcrowding and the resulting impacts on a neighborhood. This is particularly true in a university community such as Greeley. The City enforces this definition through the Code Enforcement or Building Inspection Divisions when a complaint is made; however, there have been few complaints made, and this is a difficult issue to document. The City intends to review the Code for unrelated persons in a dwelling unit during 2019 with changes to this section of the Code anticipated.

Group homes offer another form of housing for seniors and persons with disabilities. These are

residences operated as a single dwelling for no more than eight individuals, licensed by or operated by a governmental agency, to provide special care or rehabilitation due to physical condition or illness, mental condition or illness, or social or behavioral problems. Authorized supervisory personnel must be present on the premises. Group homes for more than eight individuals allow alcoholism or drug treatment centers, work release facilities, or other housing facilities that serve as an alternative to incarceration. Group homes for fewer than eight residents and those for up to eight senior residents are allowed as a design review use in the residential and commercial zoning district; however, group homes in the Low Density and Medium Density Residential districts must be separated at least 750 feet in all directions from another group home. The separation spacing results in group homes being dispersed rather than concentrated in one location. Group homes for more than eight residents are allowed in, but require use by special review approval in the High Density Residential and the Commercial districts.

A single-room occupancy (SRO) facility can provide another type of housing and is a facility that provides a single room for living purposes for one or two persons per room, offered on a weekly tenancy basis or longer. Bathrooms are provided within the units and cooking facilities may be shared among units within the facility. SROs are a permitted use in the High Density Residential district as a special review use and in the Commercial districts. There are no SRO units in Greeley.

C. Development Fees and Incentives

Land development costs include the cost of land, development review fees, and impact fees (e.g., the cost for utilities and streets to serve a lot or development). These costs are passed on to the homebuyer in the price of a new home. These fees help local government provide the infrastructure and amenities such as streets, parks, and trails that residents come to expect. Greeley's current development impact fees for a single-family (detached) house total approximately \$21,000. The fees included are community and neighborhood parks, trails, police, fire, storm drainage, and transportation. Water tap and sewer plant investment fees account for \$15,000 of this total. Building permit and plan review fees, typically assessed as a percentage of the proposed construction cost, and utility installation costs are not included in this estimate, nor are raw water costs included.

Development review fees may account for several hundred dollars, up to several thousand, depending on the type of development review processes required. All development impact and review fees are intended to recover at least some of the City's costs incurred as a result of the development. The City's CDBG funds have been used to assist Habitat for Humanity with development impact and building permit fees. In total, Greeley's fees are lower than those of other communities in Northern Colorado.

In 2011, the City adopted Redevelopment Standards and created the Greeley Redevelopment Resource Guide to assist those interested in redevelopment. The Redevelopment District was created by the City Council and encompasses the Downtown, as well as north of Downtown; areas east of 8th Avenue; areas between 8th and 11th Avenues south to the city limits; and the area between 4th and 16th Streets west to 35th Avenue. (These are also the GURA target neighborhoods.) Map Three of the Appendix shows the boundaries of the Redevelopment District. Redevelopment may be a "scrape and build" proposal (removal of existing structures and build new); infill/new development (develop vacant or underutilized property in area surrounded by existing development); or a substantial reconstruction (modifying existing structure with building alteration or addition). There are incentives and policies for redeveloping properties within this district, including a parking and open space reduction; a variance to

storm water requirements; utilizing credits for existing taps; and alternative compliance for architecture, building height, setbacks and open space/lot coverage. Property within the Redevelopment District is exempt from paying the neighborhood park fee, which reduces impact fees by about \$1,100 per house.

There are also several “unique areas” in Greeley that include Tax Increment Finance Districts (TIF) and the General Improvement District (GID). Properties in these districts may be eligible for incentives including a raw water exemption; water and sewer tap credits; infill redevelopment standards; financial assistance; grants for façade improvements; special purpose loans; and potential tax credits by being within the Enterprise Zone.

D. Neighborhood Revitalization and Municipal Services

The City’s Community Development Block Grant (CDBG) funds have long been used for projects that help revitalize low-income neighborhoods and assist with the cost of public improvements in those same target neighborhoods, which are identified as the “Redevelopment District”. For many years, property acquisition was a significant CDBG-funded program for the City, where funds were used to acquire properties in need of rehabilitation or redevelopment. Public improvements have included new sidewalks, curb and gutter, ramps for accessibility, and lighting.

The City has two programs that target housing in the Redevelopment District, the Housing Rehabilitation Program and the G-Hope Home Owner Incentive Program (G-Hope). The Housing Rehabilitation program, also funded with CDBG, has been in operation since 1976 and has assisted with the improvement of more than 1,000 houses. The program has seen many iterations; the most current provides half of the funds as a grant if owners meet certain criteria. The G-Hope program provides an incentive in the form of down payment assistance to employees of the City of Greeley, Banner Health/North Colorado Medical Center, the University of Northern Colorado, North Range Behavioral Health, Sunrise Community Health, High Plains Library District, and Greeley-Evans School District 6 in when they buy in targeted neighborhoods. The employers and target neighborhoods are within the Redevelopment District, which includes neighborhoods around the University of Northern Colorado campus. The program promotes living close to work, while investing in older, established neighborhoods that help support the vitality of Downtown and the University of Northern Colorado.

Revitalization within the Redevelopment District (with special focus on the Downtown Development District) is supported through the Redevelopment Incentive Program, initiated in 2018. Within the program are a number of financial tools available to developers: (1) Tax Increment Assistance for infrastructure and site development assistance or façade improvements; (2) Redevelopment Fee Assistance to underwrite development fees, sales, and use tax; apply redevelopment fee credits; or to allow for shared site raw water credits; (3) Redevelopment Area Improvement Fund to support area-wide infrastructure improvements that remove impediments to redevelopment; and (4) Retail Stimulus Fund to provide support for minor redevelopment property improvements to sales tax generating operations.

Greeley has more than 300 acres of neighborhood parks at more than 40 locations (Map Seven). Twenty-three of these parks are located east of 23rd Avenue in neighborhoods where residents primarily have low-incomes. One park, Aven’s Village, opened in October 2016 and is an all-inclusive

playground geared toward people of all ages and abilities. It includes a mix of sensory, social and physical activities, and allows for visitors with various levels of ability to experience similar equipment side-by-side. The all-inclusive concept is one step further than an accessible playground and incorporates many types of play (physical, sensory, social) activities that appeal to a broad range of users.

The city has two youth sports parks, one of which is located in East Greeley, a low-income neighborhood. The City's Recreation Center is located downtown on one of the bus routes, as is the Greeley Active Adult Center (for persons over 50) and the Ice Haus.

The Rodarte Cultural Center in North Greeley offers neighborhood residents a broad range of activities, including after-school and summer childcare and a boxing club. The entrance to the Center was significantly improved for safety and accessibility with CDBG funding in 2018.

The Poudre River Trail, part of which extends through North Greeley, provides 40+ miles of paved trail for walking and biking. Greeley is a bronze level Bicycle Friendly Community and has more than 100 miles of bike lanes.

City facilities are well distributed throughout the community, with thought given to the distribution and offering of facilities and activities at each location in order to provide a variety of recreational opportunities for the areas served.

E. Public Transportation/Housing/Jobs Linkage

Greeley-Evans Transit (GET) provides public transportation in Greeley and Evans on six fixed routes (Map Eight). The routes serve the city's residential neighborhoods, linking them with employment, education, and shopping opportunities. There are bus routes and stops along key transportation corridors that are the locations of many of the services and agencies that provide support to low and moderate-income households. GET also offers fare discounts to elderly and/or disabled members of the community. GET's most frequent route runs on 11th Avenue and serves the Weld County Human Services Complex (including Weld County Employment Services), Sunrise Children's Clinic, Monfort Dental Clinic, the Guadalupe Community Center and Shelter, and Weld County and City of Greeley offices. Buses run Monday – Saturday.

A Call-N-Ride service is available to the public and has evening hours Monday through Saturday and morning-early afternoon hours on Sunday. Beginning in April 2019 with the opening of the University of Colorado Health Campus and Hospital in West Greeley, a Call-N-Ride service will be available for non-paratransit customers. The service will take people from the Greeley Mall Transfer Center to the UC Health campus.

Travel training is offered to seniors and persons with disabilities and teaches them how to travel safely and independently on the bus system.

Para-transit, a door-to-door service, is available on a reservation basis for persons certified under the Americans with Disabilities Act (ADA) requirements. Para-transit riders can also use the Call-N-Ride evening service or the Sunday Call-n-Ride service.

Nearly 44,000 Greeley residents 16 years of age and older commuted to work by driving alone or carpooling, using public transportation, walking, bicycling, and other means. More than 1,500 persons worked at home and were included in the commuter numbers.

Table 23: Commuters – 2012-2016

Total commuters 16 and older	43,935	% of Total
Car, truck or van – alone	34,225	77.9%
Car, truck or van – carpoled	5,492	12.5%
Public transportation	308	0.7%
Walked	1,494	3.4%
Bicycle	439	1.0%
Other means	439	1.0%
Worked at home	1,538	3.5%
Average travel time	22.4 minutes	-----

Source: U. S. Census 2012 – 2016 American Community Survey

The City annually provides bus tokens to United Way of Weld County through a Memorandum of Understanding. United Way then makes them available to non-profits, schools, and churches to assist persons who do not otherwise have a source of transportation.

F. Housing Authority and Assisted Housing

The Greeley and Weld County Housing Authorities operate with one staff. The Authorities own and operate public housing and manage the Section 8 Housing Choice vouchers for the City of Greeley and for Weld County. These vouchers are intended to be portable. Households that are homeless, victims of domestic violence, victims of disasters, the elderly, and/or persons with disabilities are given housing assistance priority. Longevity, or the amount of time households have been waiting for housing assistance, is also a criterion. Other area agencies that provide housing to clients or consumers use similar priorities for selecting tenants, including persons and families in crisis and most vulnerable typically receiving the highest priority for housing.

Poverty rates of Housing Authority residents by race, ethnic origin, disability, and single-parent households are shown in Table 24. Black/African American households have the highest rate of poverty at 47.2%; Caucasian households are lowest at 15.9%. Single female head-of-households in units operated by the Housing Authority experience poverty at a significantly higher rate of poverty than do single male head-of-households (47.5% vs 7.6%). (Refer to Map Four-Demographics and Poverty.)

Table 24: Poverty Rates by Race, Ethnicity, Disability, Household Type: 2012-2016

Population	Poverty Rates 2012-2016
African American/Black	47.2%
Asian	28.5%
Native American	24.2%
Pacific Islander	0.0%
Caucasian/White	15.9%
Some other race	34.3%
Hispanic/Latino Origin	23.0%
With a Disability	23.6%
Single Female Head	47.5%
Single Male Head	7.6%
Families with Children (under 18)	20.4%

Source: Greeley Housing Authority; U. S. Census 2012 – 2016 American Community Survey

Current Greeley Housing Authority residents are predominantly Caucasian/White, the majority of whom identify as of the Hispanic ethnicity. Caucasians account for 91.0% of all residents; those identifying as Hispanic were 57.5% of the Housing Authority residents. A determination of whether members of protected populations experience disproportionate barriers in fair housing choice can be made by comparing citywide poverty rates for a specific population with the rates at which these populations are residents of the Housing Authority public housing units, Section 8 voucher holders, or are on the Housing Authority's waiting lists. (See Map Nine, Publicly Supported Housing and Race/Ethnicity.)

Families with children account for the majority of households in public housing (88.5%), and single female head-of-household account for 75.9% of the public housing residents. The percentage of female head-of-households receiving a Section 8 voucher is also high at 70.5%, with families with children accounting for 46.8% of the households receiving a Section 8 voucher. The public housing units are primarily two and three-bedroom units, while the majority of voucher holders are living in two-bedroom units.

Table 25: Greeley Housing Authority Residents – 2018*

	Public Housing		Voucher Holders	
Total Households	87		376	
Household Type**				
Families with children	77	88.5%	176	46.8%
Elderly	7	8.0%	138	36.7%
Single female parent	66	75.9%	265	70.5%
Single male parent	21	24.1%	111	29.5%
Race/Ethnicity				
Asian	1	1.1%	1	0.3%
Black	19	21.8%	30	8.0%
White	66	75.9%	342	91.0%
Other	1	1.1%	1	0.3%
Hispanic/Latino	50	57.5%	188	50.0%
Units by Bedroom Size				
0 bedroom	0	0	11	2.9%
1 bedroom	0	0	142	37.8%
2 bedroom	28	32.2%	115	30.6%
3 bedroom	36	41.4%	72	19.1%
4 bedroom	22	25.3%	32	8.5%
5+ bedroom	1	1.1%	4	1.1%
Source: Greeley Housing Authority * Totals may not match due to lack of information.				
** A household may fall within more than one type				

Because of the large number of people on the waiting lists – 424 for public housing and 744 for Section 8), the Housing Authority wait lists have been closed for the remainder of 2018. The Housing Authority's public housing units consist of six scattered-site single-family units and apartment units in three locations (Dominic Apartments on 1st Avenue; 17th Avenue Apartments; and 28th Street Apartments). These three apartment complexes offer two, three, and four-bedroom units and one five-bedroom unit at the 28th Street location. Units that are accessible for persons with disabilities are at the 17th Avenue and 28th Street locations.

Of the households on both wait lists, the largest groups are those that have incomes of 30.0% AMI or less. The wait list includes 424 households waiting for 86 units of public housing and another 744 households waiting for one of the 406 Section 8 vouchers.

Families with children make up the largest segment of the households wait for public housing and for vouchers. Of the households on the wait lists, 85.0% are Caucasian/White households. On both wait lists, families with children and households of Hispanic/Latino ethnicity are seeking assistance at higher rates than the poverty levels for these populations citywide.

Table 26: Greeley Housing Authority Waiting List Applicants – 2018*

	Public Housing		Vouchers	
Total Households	362		657	
Income Level				
30% AMI or less	287	79.2%	550	83.71%
30.1 – 50% AMI	71	19.6%	100	23.2%
50.1 – 80% AMI	2	0.005%	3	0.004%
Household Type**				
Families with children	355	98.07%	476	22.45%
Elderly	2	0.66%	35	5.33%
Families with disabilities	6	1.66%	242	17.9%
Race/Ethnicity				
Asian	1	0.28%	3	0.46%
Black	59	16.3	52	7.91%
Native American	0	0%	1	0.15%
White	302	83.43%	560	85.24%
Other	0	0%	2	0.30%
Hispanic/Latino	204	56.35%	362	55.1%

Source: Greeley Housing Authority, 2018. *Totals may not match due to lack of information.

** A household may fall within more than one type

The Housing Authority also manages two apartment complexes that were developed with Low Income Housing Tax Credits and HOME Investment Partnership Program funds, La Casa Rosa Apartments and Stage Coach Garden Apartments. La Casa Rosa offers fourteen one-and two-bedroom apartments for seniors 55 and older. Stage Coach Garden has thirty two- and three-bedroom apartments for households with low incomes. Housing Choice Vouchers may be used toward the rent at either location.

G. Property Tax Policies

In Colorado, disabled veterans and senior income-qualified households are eligible for a property tax exemption of 50.0% of the first \$200,000 of the value of their primary residence. (The property tax exemption for seniors was not funded for tax years 2009, 2010, and 2011; however, the property tax exemption was still in effect for disabled veterans.) There is also a deferment or postponement for the payment of property taxes on an owner-occupied residence for seniors. This tax deferral program captures the deferred taxes when the property is sold or title transferred, the owner dies or moves for a reason other than ill health, or when the property is rented and becomes a source of income.

Through the Greeley Urban Renewal Authority, the City of Greeley has five Tax Increment Financing (TIF) Districts, and one additional is operated through the Downtown Development Authority. These districts can provide tax increment financing for development or redevelopment in these areas, which can be particularly beneficial for industry and the creation of new jobs.

H. Boards and Commissions

The Greeley City Council has a policy of appointing community members that reflect the diverse character of the community to serve on voluntary boards and commissions. The council considers gender, minority status, occupation or experiences, and community geographic representation. There are four citizen boards or commissions that may address housing and/or protected populations in

Greeley, as noted below. Additionally, on an as needed basis, standing committees and/or focus groups may provide additional insight into issues of housing and community development.

- **Commission on Disabilities** promotes full inclusion and integration of people with disabilities into all parts of society. Five of the members must be individuals with a disability, one member must represent an employer, and one must be the parent of a minor with a disability.
- **Human Relations Board** fosters respect and understanding to promote amicable relations among all members of the Greeley community. There are 11 members, with eight appointed by the Greeley City Council, one by the University of Northern Colorado, one by Aims Community College, and one by Greeley/Evans School District Six
- **Planning Commission** makes decisions or recommendations on land use and zoning matters, including housing developments and planning documents, such as the Comprehensive Plan and all zoning regulations.
- **Greeley Urban Renewal Authority**, administrator of the City's CDBG and HOME grants, oversees a program of housing and neighborhood assistance to individuals with lower incomes and manages commercial rehabilitation and development within the urban renewal boundaries.

These groups include representatives of the Hispanic/Latino community, persons with disabilities, males and females, representatives of varying familial status, and various occupational backgrounds relative to housing and/or protected populations.

I. Building Codes and Accessibility

The City's Building Inspection office reviews plans, issues building permits, and inspects all work performed under a permit issued in residential units. The City has adopted the 2015 International Building Codes (with the exception of 2009 International Energy Conservation Code), with some local amendments. The International Code Council's (ICC) Accessible and Usable Buildings and Facilities (A117.1) provide standards for accessibility in multi-family housing developments. Items included in these standards are accessible building entrances on an accessible route; accessible common and public use areas; usable doors; accessible route into and thru the unit; light switches, outlets, thermostats and other environmental controls in accessible locations; reinforced walls in bathrooms for future grab bar installation; and usable kitchens and bathrooms. Units are categorized as Type A units, which are fully accessible, and Type B units, which are adaptable and can be made accessible in the future. The number of required accessible units (Type A) is at least two percent, but not less than one unit for buildings containing more than 20 dwelling units or sleeping units. If a structure has four or more units in it, all units must be Type B (adaptable) units. These standards are generally consistent with HUD's Fair Housing Accessibility Guidelines and the Federal Fair Housing Act (FFHA). There are exceptions to these standards based on whether elevator service is provided, the number of stories in the structure, and/or the existence of site slope constraints.

Under the Fair Housing Act, buildings with four or more units first occupied after March 13, 1991 must have an accessible entrance on an accessible route; public and common areas that are accessible; and doors and hallways wide enough for wheelchairs. Additionally, all ground floor units and all units in buildings with elevators must have an accessible route into and throughout the unit; accessible

switches, outlets, thermostats and other environmental controls; reinforced bathroom walls that allow for the installation of grab bars in the future; and kitchens and bathrooms usable by someone in a wheelchair.

Title II and III Regulations of the Americans with Disabilities Act (ADA), which went into law in 2011, require equal access to places of public accommodation and commercial facilities for persons that have a disability. This includes recreational areas such swimming pools, exercise rooms and equipment, golf courses, play areas, saunas and steam rooms, and boating or fishing platforms. These items are included in the 2010 ADA Standards for Accessible Design, which take into account design requirements for such things as children's needs and sizes, accessibility in parking garages, assembly areas, and circulation routes and pathways, and restroom design.

Some communities have adopted visitability standards or universal design standards as a way to increase the supply of housing units that are accessible for a person that has a disability. Visitability is designing single-family homes to allow the home to be lived in or be visited by an individual who has a disability. The principles of visitability are to have at least one entrance without a step, doors and hallways wide enough for a wheelchair to get through, and a first-floor bathroom large enough for a wheelchair to fit into and be able to close the door.

Universal design refers to the design of all products and environments to be usable by all people, without the need for adaptation or specialized design. The principles of this design are:

- Equitable design, usable by and appealing to all persons
- Flexible use design, to accommodate right or left-handed use
- Simple and intuitive features, eliminating unnecessary complexity in design
- Information that is perceptible for all persons, including those with a sensory limitation
- Inclusion of fail-safe features
- Features that minimize repetitive actions

These forms of standards and design are becoming more valuable to support an aging population with their housing needs. Greeley does not require visitability or universal design standards.

SECTION SIX – Evaluation of Private Sector Policies and Programs

A. Mortgage Lending Policies and Practices

Financial institutions that provide mortgage lending must comply with fair lending practices to ensure that discrimination does not occur through their lending policies and practices. The Community Reinvestment Act (CRA) encourages financial institutions to participate in community activities, particularly those that provide assistance to low and moderate-income areas in the communities in which they do business. Participation in area non-profits as board members or other volunteer work, making donations, providing classes, and generally, investing in their local community are examples of activities that lenders may provide and encourage of their employees.

Many area lenders participate in Colorado Housing and Finance Authority (CHFA) programs, as well as the government-backed FHA and VA loan programs. FHA private mortgage insurance requirements

now require a larger insurance premium up-front, as well as the premium required for the life of the loan, which makes these loans more costly to homebuyers. In some cases, conventional loans may now be more attractive than FHA loans, if buyers have the required down payment (which is a larger percentage than FHA).

Discrimination in mortgage lending is prohibited by the Federal Fair Housing Act, making it unlawful to engage in lending practices that discriminate on the basis of race, color, national origin, religion, sex, familial status, or disability. Discriminatory lending practices may include refusing to make a loan or provide information on loans; using different terms or conditions such as interest rates, points, or fees; how property is appraised; or refusing to purchase a loan – based on the applicant’s race, color, etc. The Federal Financial Institutions Examination Council (FFIEC) collects data and monitors mortgage lending in the United States through the Home Mortgage Disclosure Act Data (HMDA). The HMDA information used for this report is for government-backed loans (FHA, VA, FSA/RHS), as well as conventional loans for homes purchased, refinanced, and for home improvement loans in Greeley. The HMDA data for 2016 is summarized in the tables that follow. Loan applications submitted for Greeley properties totaled 10,299 in 2016. Of these, 72.82% of were originated, while 9.14% were denied.

Table 27: Status of Home Loan Applications: 2016

Status	Number	Percentage
TOTAL LOAN APPLICATIONS	10,299	100%
Loan Originated	7,500	72.82%
Application approved/not accepted by applicant	286	2.78%
Application denied by lender	941	9.14%
Application withdrawn by applicant	1,126	11.9%
File closed - incomplete	346	3.6%

Source: Home Mortgage Disclosure Act Data, Table 4-1 and 4-2, Reporting Year 2016

The status of home loan applications by race and ethnicity are summarized below. Native Americans had the lowest rate of loans originated and the highest denial rates. For Hispanic/Latino applicants, 63.8% had their loan originated while 23.4% had their loans denied. In contrast, non-Hispanic/Latino residents had a 75.4% loan origination rate and a 10.0% denial rate.

Table 28: Status of Home Loan Applications by Race and Ethnicity: 2016

Race	# Applications	Percent Originated	Percent Approved Not Accepted	Percent Denied
African American/Black	63	76.2%	2.1%	10.4%
Asian	166	75.9%	4.8%	11.1%
Caucasian/White	8,617	74.0%	3.7%	11.1%
Native American	62	72.6%	2.2%	13.3%
Pacific Islander	22	77.3%	5.9%	11.8%
Hispanic/Latino	1,439	63.8%	4.2%	23.4%
Non-Hispanic/Latino	7,406	75.4%	3.6%	10.0%

Source: Home Mortgage Disclosure Act Data, Tables 4.1 – 4.2, Reporting Year 2016

Note: other outcomes - a application being withdrawn or file closed due to incompleteness are not included in this data

The reasons most cited for loan denials are summarized below by race and ethnicity. For all races/ethnicities except Black/African Americans (with just one application denial), the debt-to-income ratio reason was 28% or higher.

Table 29: Home Loan Application Denial Rate (%) Reasons by Race and Ethnicity - 2016

Race / Ethnicity	# of Apps	Debt-to-Income Ratio	Job History	Credit History	Lack of Collateral	Insufficient Cash	Info. not Verified	Incomplete Credit App	Mort. Ins. Denied	Other
African American/Black	1				100%					
Asian	16	38%	6%	13%	19%		6%			19%
Caucasian/White	492	29%	3%	18%	15%	7%	9%	9%		10%
Native American	0									
Pacific Islander	3	34%						33%		33%
Other multi-racial	4	50%		50%						
Race not available	68	28%	1%	18%	12%	18%	6%	10%		7%
Hispanic/ Latino	103	30%	6%	16%	17%	10%	6%	2%		15%
Non-Hispanic/ Latino	399	29%	3%	18%	15%	6%	10%	11%		10%
Joint ethnicity-Hisp/non-Hisp	14	29%	7%	21%		14%	14%	7%		7%
Ethnicity not available	61	28%		20%	13%	15%	7%	11%		7%

Source: Home Mortgage Disclosure Act Data, Tables 8.1 – 8.2, Reporting Year 2016

Based on the HMDA information, Hispanic/Latino applicants appear to have higher rates of denial for mortgages than the entire applicant population. Debt-to-income ratios are the primary reason for denials for this ethnicity, followed by lack of collateral and credit history. There may be other factors (other than discriminatory practices) that contribute to the higher denial rates. (As noted in Table Nine, 23% of the Hispanic population have poverty level incomes.)

B. Real Estate Practices

The Greeley area has an active Realtor® association, which includes Realtors® and affiliate members. Affiliates include appraisers, lenders, title companies, and other businesses related to the real estate industry. The Realtor® Code of Ethics includes Article 10, which generally incorporates the same provisions as the Fair Housing Act. Membership in the local real estate community is diverse, with women, members of minority populations, and persons with disabilities represented. Many real estate agencies have staff that speak Spanish and/or have access to translation services. Members are typically active in the community and participate on City boards and commissions and on the boards of area non-profits.

SECTION SEVEN – Evaluation of Current Fair Housing Programs and Activities

A. Current Fair Housing Programs and Activities

The City of Greeley's last AI was completed in 2013 for the 2015-2019 Five-Year Consolidated Plan. The following impediments were identified at that time:

- Housing discrimination
- Language and culture
- Transportation
- Lack of affordable housing units disproportionately affect some protected classes
- Higher mortgage loan denial rates for Hispanic/Latino households

The City implemented an Action Plan to work toward alleviating the identified impediments and reports annually to HUD on actions taken to lessen the effects of those impediments. The 2013 impediments and progress made to reduce their effects are noted below.

Housing discrimination

Because survey results and information from HUD during the 2013 Analysis indicated there were Greeley residents who believed they had been treated in a discriminatory manner (although not formally reported), housing discrimination was identified as an impediment. With the intent of better informing protected classes of their fair housing rights, the City provided information on fair housing to area agencies that work with protected classes and, when appropriate, as federal grant activities were implemented. Information provided has included the brochures, "They Told Us Not to Live Here" (in English and Spanish), updates in the Rental Housing Guide, and packets of fair housing brochures to personalize with agency information.

The City tracks the beneficiaries of its CDBG and HOME programs and reports on that data annually to HUD. Not all programs are housing-related.

Language and culture

The City is aware of the diversity of cultures within the community and works diligently to support that diversity in many ways. It has a large Hispanic population and is also home to a sizable refugee community. Spanish is still the second-most prevalent language spoken in Greeley; however, there are a number of other languages/dialects spoken by the refugee and immigrant community, but the numbers are not large.

Many cultural festivals and events are supported by the City, for example, Cinco de Mayo, a Menorah Lighting Ceremony, A Walk in Their Shoes (a simulated refugee experience), and a Dia de Los Muertos celebration. Diversity is also supported at the University of Northern Colorado (UNC), where seven resource and cultural centers are housed. In addition to providing many services to the student population, the different centers host events and bring nationally recognized speakers to campus. UNC also provides equity and inclusion trainings and consultations to that academic community. The Immigrant and Refugee Center of Northern Colorado assists refugees and immigrants with the challenges of adapting to a new community through programs in education, health, finance, culture, and civil and human rights.

The City's website can be translated into a number of different languages, and the City has an adopted Administrative Rule regarding Limited English Proficiency (LEP). A Four-Factor Analysis was also conducted and verified the need for translation of documents into Spanish. Ads dealing with the federal grant processes are published in English and Spanish, and the City has a number of bi-lingual employees to assist Spanish-speakers.

The Housing Authority also provides publications in Spanish, as do many of the area agencies and organizations. Connections for Independent Living provides sign language interpreting services for those whose primary method of communication is sign language.

Transportation

Transportation was identified as a barrier for households that do not have their own transportation. The proximity of housing locations to bus routes and bus stops has a significant bearing on a household's options for housing. Because city bus routes do not extend to the far west boundaries of the city, housing options may be restricted to other areas of the Greeley. (Neighborhoods in west Greeley, for the most part, are neighborhoods where residents predominantly have incomes that exceed 80% of the AMI; transportation is not such an issue for higher income earners.)

Helping to alleviate transportation as an impediment, the City provides a number of no-cost or low-cost options for users of the transportation system in the community. Those include a free pass for students, door-to-door paratransit service for persons who qualify under the Americans with Disabilities Act of 1990 with a ticket booklet for significant savings, and a discount card that allows seniors and individuals with disabilities to take advantage of discounted fares. It also provides free passes to agencies with low-income clientele through the United Way.

Lack of affordable housing units disproportionately affect some protected classes

The 2013 Analysis of Impediments identified a lack of units for large families as an impediment. It cited families with children, families headed by a single parent, households that have a disabled member, and households of Hispanic/Latino origin as populations residing in Housing Authority units, using Section 8 vouchers, or are on the waiting lists for assisted housing at greater rates than these populations city-wide. The Analysis noted those populations could benefit from additional affordable housing geared to their needs, particularly units with three or more bedrooms.

Since publication of the 2013 Analysis, new developments have been constructed that increased the number of three-bedroom units available in the community, including Mission Village and Porter House Apartments.

While the lack of affordable housing alone is not a fair housing issue, the lack of affordable units may disproportionately keep protected classes congregated in locations east of 35th Avenue where the majority of the affordable units are located. The City's Urban Renewal Authority has policies designed to encourage the development and dispersal of affordable housing throughout all areas of the community. GURA continues to adhere to all directives issued by HUD for the administration of the Community Development Block Grant Program and the HOME Investment Partnership Program.

Information from agencies that work with low-income and homeless person continue to share that a lack of affordable housing remains a problem for low-income persons, particularly those trying to exit

homelessness. Within the City, there are a number of agencies that provide shelter and other assistance, some of which are highlighted below:

- Catholic Charities provides shelter and services for the homeless at its Guadalupe Community Center location in Greeley. There are 24 beds for men, six beds for women, and six separate family rooms. There are also beds designated for veterans.
- A Woman's Place provides emergency shelter for victims of domestic violence and their children. Shelter stays have become longer, due to a lack of other available housing, particularly for large families.
- The Greeley Transitional House provides shelter for homeless families and transitional housing for qualified families that exit the shelter.
- Migrant Farm Labor offers housing to seasonal farm workers in the area in 144 bedrooms at Plaza del Sol, as well as to year-round farm or agricultural workers and their families at Plaza de Milagro's 39 apartments. The units at Plaza del Milagro and Plaza del Sol are conveniently located to Leprino foods, a large cheese factory with high demand for dairy production workers. Leprino opened in 2011, completed its last addition in 2017, and provides about 550 agricultural-related jobs to the area.
- In October 2018, the seventh annual Weld Project Connect event, organized by United Way of Weld County, offered services to 850 Weld County residents assisted by early 500 volunteer "navigators" who helped guide them to the various services available. The event is sponsored by many local agencies, businesses, and entities and offered services that ranged from medical and dental screenings, to veterans services and legal advice. Fair housing surveys were offered to approximately 50 people prior to the event's start.

Greeley continued to conduct an annual Point-in-Time Count (PIT) of Greeley's sheltered and unsheltered homeless population, with the most recent completed in January 2018. One hundred sixty-four persons staying in one of the areas shelters (A Woman's Place, Guadalupe Community Center, and Greeley Transitional House) or transitional housing units (Camfield Corner Apartments, North Range Behavioral Health Transitional Housing) were interviewed, as were ninety unsheltered people.

Table 30: Point-in-time Survey: 2018

Location	Number of Homeless
A Woman's Place (shelter for survivors of domestic violence)	30 (12 adults; 18 children)
Greeley Transitional House (family shelter)	42 (20 adults, 22 children)
Guadalupe Community Center (general shelter)	40 (28 adults, 12 children)
Camfield Corner Apartments	35 (16 adults, 19 children)
North Range Behavioral Health Transitional Housing	17 (17 adults, no children)
On the street	90 (90 adults, 0 children)
TOTAL	254 (183 adults, 71 children)

Source: Point-in-Time Survey, January 2018

Higher mortgage loan denial rates for Hispanic/Latino households

While higher mortgage loan denial rates for Hispanic/Latino households was identified as an impediment, the City has no control over the mortgage loan application process. The mortgage loan industry has its own systems in place to identify issues.

Language barriers were identified as an impediment in the last two Analysis of Impediments to Fair Housing reports (2007 and 2013). The diversity in the community has continued to increase, as has the number of persons whose primary language is not English (76.3% identified as speaking on English in 2011; the number was down to 74.9% in 2016). Spanish is still the second-most prevalent language, but all identified languages saw some increase over the last five years. The Immigrant and Refugee Center of Northern Colorado (formerly the Global Refugee Center) opened in 2008 to assist immigrants and refugees with the challenges of retaining their own culture while adapting to a new community. It merged in 2017 with Right to Read and offers programs in education, health, finance, culture and civil and human rights.

Table 31: Language Spoken at Home: Population of 5+ years of age

Language	Number	% of Population
Speak Only English	68,904	74.9%
Speak Language other than English		
Spanish	20,551	22.3%
Indo-European	799	0.9%
Asian, Pacific Island Languages	1,158	1.3%
Other	591	0.6%
TOTAL	92,003	100%
Source: U. S. Census 2007 – 2011 and 2012 – 2016 American Community Survey		

The awareness level of the potential for language barriers has been increasing. Many of the agencies and organizations have bi-lingual staff or have access to translation services; however, rental and leasing agents and landlords may not have these language services available for prospective tenants who do not speak English. The Housing Authority provides publications in Spanish, as do many of the area agencies and organizations. Connections for Independent Living also provides sign language interpreting services for those whose primary method of communication is sign language.

The City of Greeley adopted an Administrative Rule regarding Limited English Proficiency or LEP, in 2011. The Urban Renewal Authority has since adopted this rule for use as its LEP policy for the Housing Rehabilitation and other housing programs. This Administrative Rule also provides guidance in working with individuals who are hearing or vision impaired, with service animals, and in securing translation services – either from bi-lingual employees, or through Language Line Services, which provides translation for over 200 languages. This rule provides detailed information to employees in providing translation assistance, and other forms of assistance. It also states the City's hiring preference for bilingual persons for positions that require a significant amount of public contact.

B. Other Fair Housing Organizations/Assistance

The Colorado Civil Rights Division is the designated Fair Housing Assistance Program (FHAP) for Colorado. CCRD investigates all housing discrimination complaints for HUD in Colorado. CCRD provides information and training sessions on fair housing at various locations throughout the state.

Colorado Legal Services (CLS) also provides assistance with housing discrimination inquiries to low and moderate-income persons. CLS has 13 offices statewide, (one of which is in downtown Greeley) and responds to legal issues and questions, including landlord-tenant issues and housing discrimination. This office serves residents of Morgan, Washington, Weld (including Greeley), and Yuma counties. CLS refers potential housing discrimination cases to HUD or to the CCRD for investigation.

The City of Greeley's Neighborhood Resources office operates the Community Mediation program for Greeley residents. The intent of this program is to "build strong neighborhoods by empowering residents to resolve disputes peacefully". Landlord/tenant conflicts are eligible for mediation services. The City also publishes the Rental Housing Guide for Landlords and Tenants. This guide includes a section on fair housing and renters with disabilities. This guide offers useful information for rental properties. The City's Operation Safe Stay program, started in December 2005, also provides fair housing information and training for member businesses, including owners and operators of apartment complexes and hotels/motel. While the focus of Operation Safe Stay was originally on safety at area hotels and motels, the principles of the program were expanded to include rental properties. For 2018, there were 69 active participants representing more than 6,000 rental units participating in Operation Safe Stay.

SECTION EIGHT – Impediments & Fair Housing Action Plan

It is evident that the Greeley community works hard to foster a culture of diversity and racial tolerance. Fair housing issues, while they certainly exist, do not appear to be severe. Housing challenges for the community are more centered around factors that do not violate fair housing laws: High cost of both rental and for-sale housing; insufficient financial resources that negatively affect the ability of low-income persons to obtain housing; and the lack of housing availability for all income levels. Those factors may affect protected classes in greater numbers and contribute to the perception that discrimination has occurred.

Many comments received on the surveys had to do with what is perceived to be discrimination, but were not fair housing issues under the law. Those issues have been noted in the Analysis because they are legitimate concerns with regard to housing availability in Greeley, but are not included as an impediment or made part of the Fair Housing Action Plan.

A. Impediments to Fair Housing Choice

After reviewing the impediments cited in the 2013 report, statistical and demographic information, the survey results, and other information provided for the 2018 update to the Analysis of Impediments study, it was determined that there are no new impediments to fair housing in Greeley. The goals and actions of the 2013 Fair Housing Action Plan have been modestly updated and refined, and the City will continue to address them during the years 2020-2024. Impediments follow:

- 1. Discrimination due to race, color, national origin, or ancestry or disability:** Housing discrimination appears to be taking place in Greeley to some degree, particularly in rental housing, for reasons of race, ethnicity, color, national origin, or ancestry. Greeley has a high percentage of its population that identifies as of the Hispanic ethnicity or a race other than

Caucasian, which increases the possibility of discrimination occurring due to these factors. Having a disability, either mental or physical, was also cited by a high percentage of persons completing the survey and in the formal complaints filed with HUD during the last five year as a reason for discrimination. Denial of reasonable accommodation and/or service animals were particularly noted as reasons the person felt discriminated against.

While being a low-income person does not provide protection under fair housing laws, the high percentage of minorities in Greeley with a low-income (reference Table 9) could create a means for veiled discrimination and should be considered a subset of the first impediment. Seventeen percent of survey responses cited income as the reason they felt they had encountered discrimination. Coupled with the high number of minorities with low-income in the community, the possibility of discrimination increases for the minority populations.

- 2. Language and culture:** Language and cultural barriers to fair housing choice are an impediment. With the location of refugees and immigrants in Greeley from many nations and the high number of persons who speak Spanish, the need for translation services and a better understanding of cultural differences will not only continue to be important, but a lack could impede fair housing choice.
- 3. Transportation:** Transportation is a barrier for households that do not have their own transportation, particularly if public transportation is not easily accessed.
- 4. Lack of affordable housing units disproportionately affect some protected classes:** Families with children, families headed by a single-parent, households that have a disabled member, and households of Hispanic/Latino origin are residing in Housing Authority units, using Section 8 vouchers, or are on the waiting lists for assisted housing at greater rates than these populations city-wide and could benefit from additional affordable housing geared to their needs.
- 5. Higher mortgage loan denial rates for Hispanic/Latino households:** The reasons behind these higher loan denial rates may not be discriminatory, but since this cannot be fully established from the available HMDA data, it is a consideration that should be noted and monitored. The City cannot control the private real estate and loan market, but it can monitor the participants in city-sponsored or funded programs, such as G-Hope and Habitat for Humanity and encourage minority ownership.

Fair Housing Action

This Fair Housing Action Plan is intended to establish a framework for improving fair housing choice over the next five years.

Table 32: Fair Housing Action Plan

Impediment 1: Housing Discrimination				
Goal	Actions	Participants	Timeframe	Measure
Increase awareness and understanding of fair housing and housing discrimination	1A. Promote distribution of information to real estate industry, owners and managers of apartments, and lending industry through public awareness events, written materials, or other means	GURA Greeley real estate community Property managers UNC Housing CCRD & HUD	Ongoing	<ul style="list-style-type: none"> Number of events held or number of information pieces distributed Number of attendees or persons receiving informational material
	1B. Promote distribution of information to housing providers including Housing Authority and housing nonprofits through awareness events, written materials, or other means	GURA Housing Authority Housing nonprofit agencies CCRD & HUD	Ongoing	<ul style="list-style-type: none"> Number of events held or number of information pieces distributed Number of attendees or persons receiving informational material
	1C. Encourage Housing Authority and housing non-profits to hold awareness events for residents	Housing Authority Housing nonprofit agencies CCRD & HUD	Ongoing	<ul style="list-style-type: none"> Number of events held or number of informational pieces distributed
	1D. Monitor City publications that include information on fair housing (Rental Guide, Operation Safe Stay, etc.) to state protected classes and update as needed	Neighborhood Resources GURA	Ongoing, as needed	<ul style="list-style-type: none"> Number of publications updated
Impediment 2: Language and Culture				
Goal	Actions	Participants	Timeframe	Measure
Improve access to services for persons who have Limited English Proficiency (LEP)	2A. Continue to follow the City's Administrative Policy as the LEP plan for all GURA programs	GURA	Ongoing	<ul style="list-style-type: none"> Number of forms and documents provided in a language other than English
	2B. Encourage the adoption of the City's LEP Plan (or similar) for all agencies funded through CDBG and HOME funds	GURA Sub-recipient agencies	Ongoing	<ul style="list-style-type: none"> Number of Sub-grantee agencies that adopt or create an LEP
	2C. Support and promote activities and programs of the Immigrant and Refugee Center of Northern Colorado (IRC)	City of Greeley GURA Neighborhood Resources	On-going	<ul style="list-style-type: none"> Number of activities supported (financial or in-kind support)

Impediment 3: Transportation				
Goal	Actions	Participants	Timeframe	Measure
Improve access to public transportation	3A. Continue to provide funding for bus tokens to non-profit agencies for distribution to households without their own transportation	Public Works/GET Non-profit agencies	On-going	<ul style="list-style-type: none"> Number of bus tokens distributed annually
	3C. Continue to provide reduced-cost bus tokens to persons who are elderly or disabled	Public Works/GET Non-profit agencies	On-going	<ul style="list-style-type: none"> Number of bus tokens distributed annually
	3B. Promote the location of housing with convenient access to public transportation	City Planning Public Works/GET GURA	On-going	<ul style="list-style-type: none"> Number of new housing units on bus routes
Impediment 4: Lack of affordable housing units disproportionately affect some protected classes				
Goal	Actions	Participants	Timeframe	Measure
Increases supply of affordable and accessible housing dispersed in the community	4A. Provide additional housing for persons with disabilities by directing funding to developments that support this population, both rental and for sale units	GURA GCI Connections Private developers	Ongoing	<ul style="list-style-type: none"> Number of new accessible units
	4B. Promote retention of existing housing stock by supporting housing rehab for accommodations for persons with disabilities	GURA City of Greeley	Ongoing	<ul style="list-style-type: none"> Number of rehabs completed for persons that are disabled
	4C. Encourage additional affordable housing units for larger families by directing funding for rental and for-sale units	GURA City of Greeley Non-profit housing agencies	On-going	<ul style="list-style-type: none"> Number of new affordable units (rental and for-sale)
	4D. Continue to support Habitat for Humanity through HOME funds	GURA Habitat	On-going	<ul style="list-style-type: none"> Number of units completed and sold
Impediment 5: Higher mortgage loan denial rates for Hispanic/Latino households				
Goal	Actions	Participants	Timeframe	Measure
Promote homeownership opportunities in City programs and support of Habitat for Humanity	5A. Work with area real estate community to keep them informed of new or existing homeownership opportunities that could be accessed by Hispanic/Latino households	GURA Greeley real estate professionals	On-going	<ul style="list-style-type: none"> Annual number of loans provided through City or Habitat programs to Hispanic/Latino households

SECTION NINE – Signature Page

I certify that this Analysis of Impediments to Fair Housing Choice for the City of Greeley has been approved by the Greeley City Council on _____, 2019.

John Gates, Mayor

Date

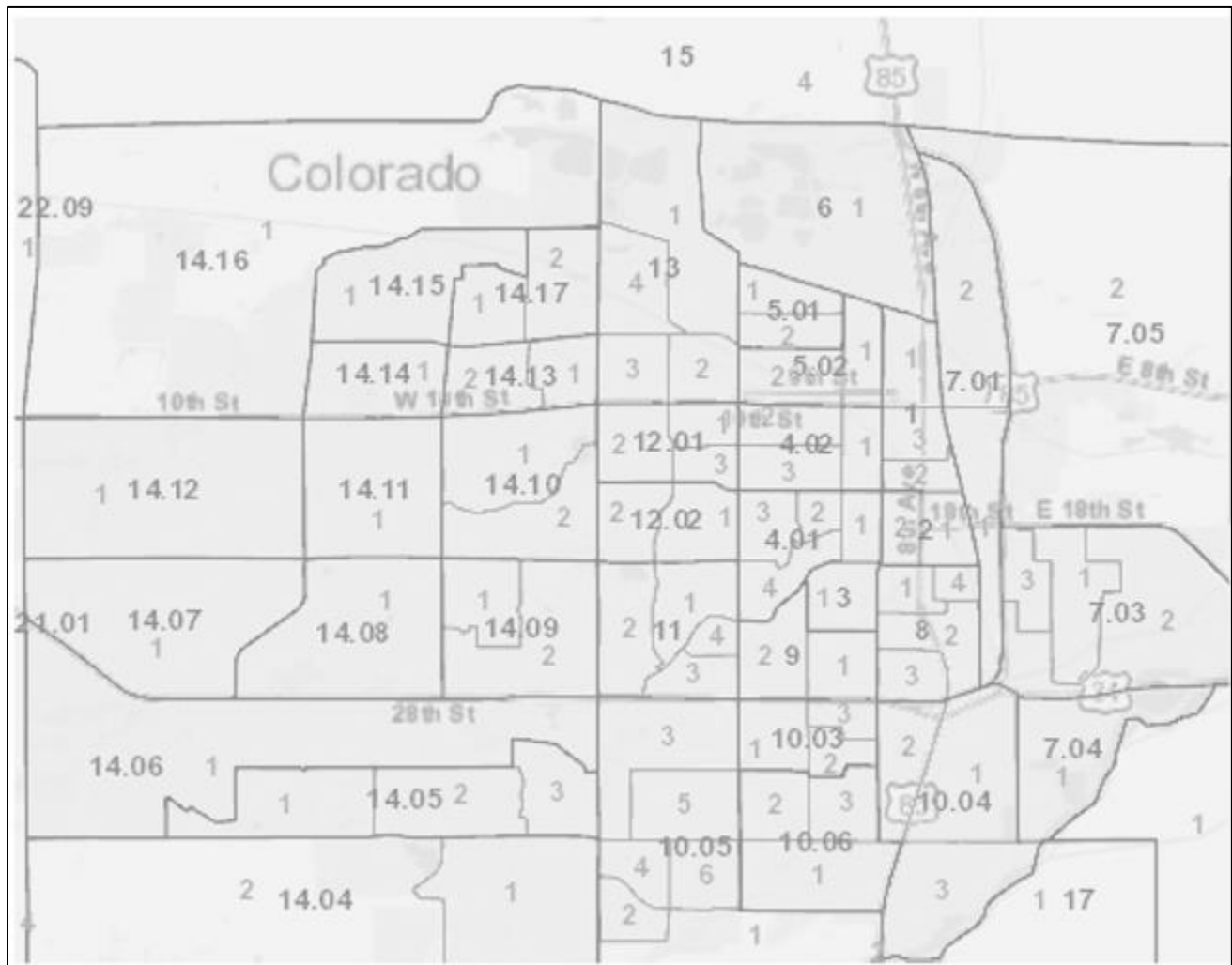
SECTION TEN - Appendix

A. Maps

1. Census Tracts
2. Census Tract with income percentage
3. Redevelopment District
4. Racial and ethnic minority concentration
5. Demographics and poverty
6. City parks and other recreational and community facilities
7. Greeley-Evans Transit (GET) routes and Weld County Employment Services locations
8. Publicly supported housing and race/ethnicity
9. Location of affordable rental housing

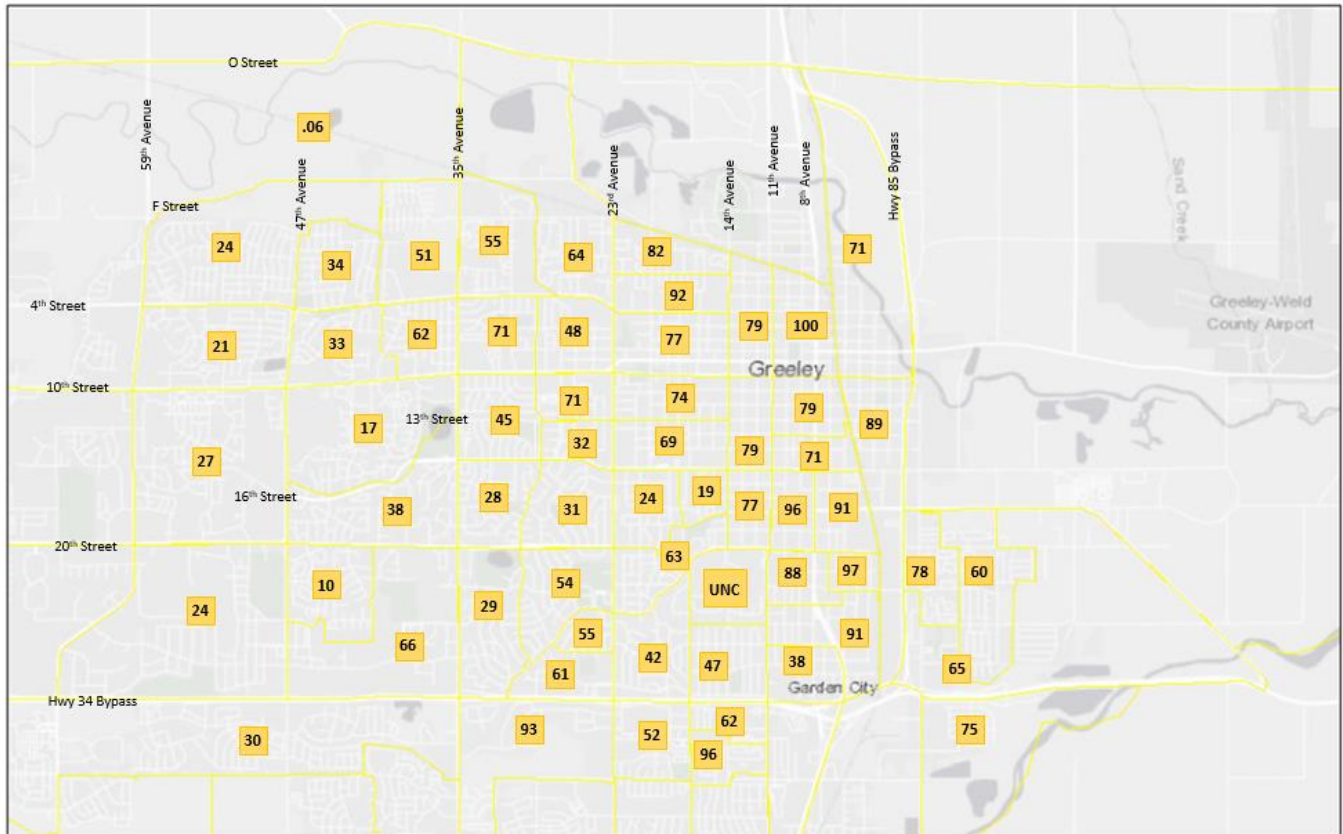
B. Fair Housing Survey

Map 1 – Greeley Census Tracts and Block Groups



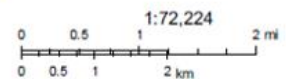
Map 2 – Low-income Census Tracts (Percentage of LMI noted)

CPD's 2014 Updated LMISD



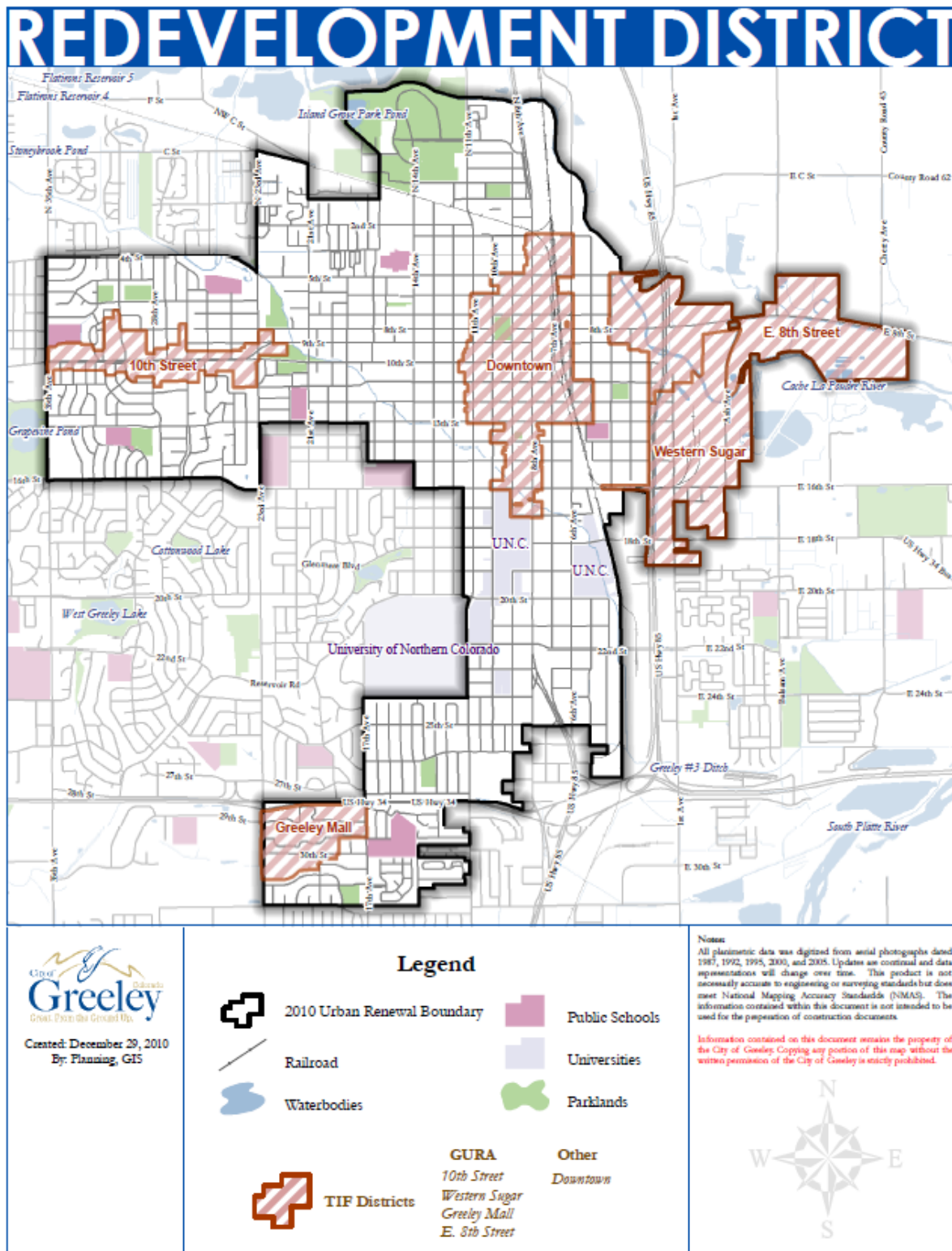
February 28, 2018

% of Block Group that is LMI



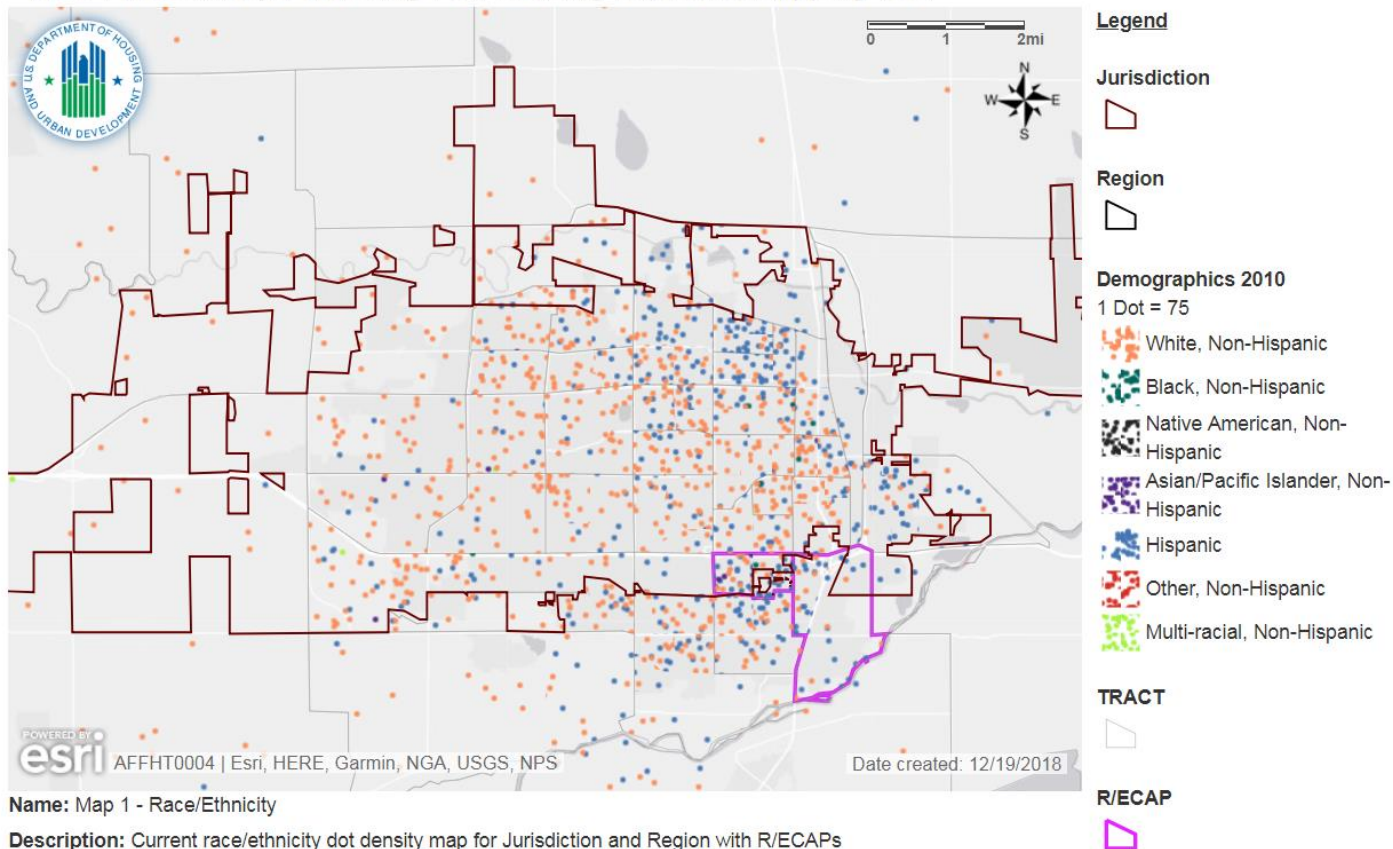
Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

Map 3 – Redevelopment District



Map 4 - Racial and ethnic minority concentrations

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Name: Map 1 - Race/Ethnicity

Description: Current race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

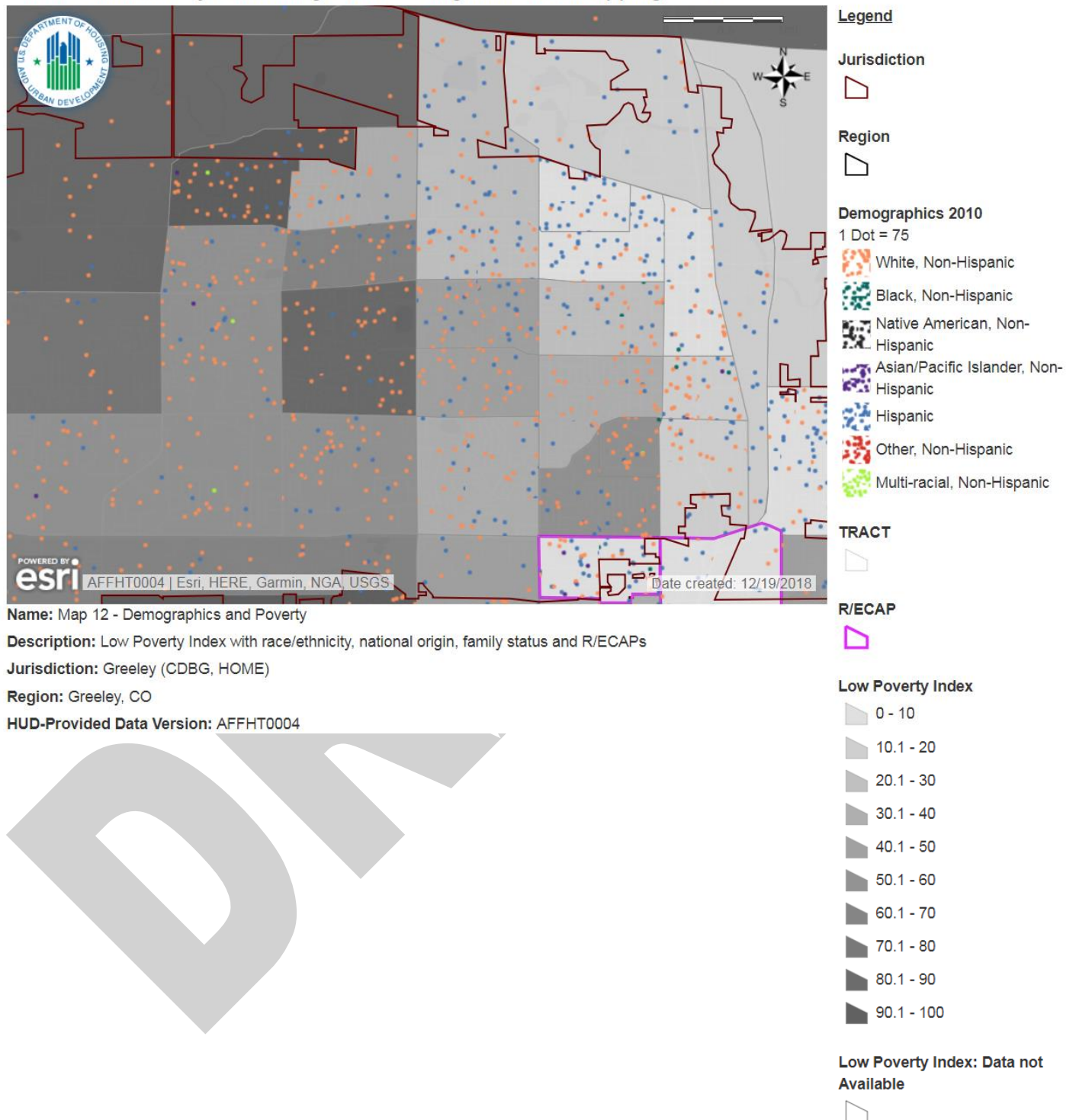
Jurisdiction: Greeley (CDBG, HOME)

Region: Greeley, CO

HUD-Provided Data Version: AFFHT0004

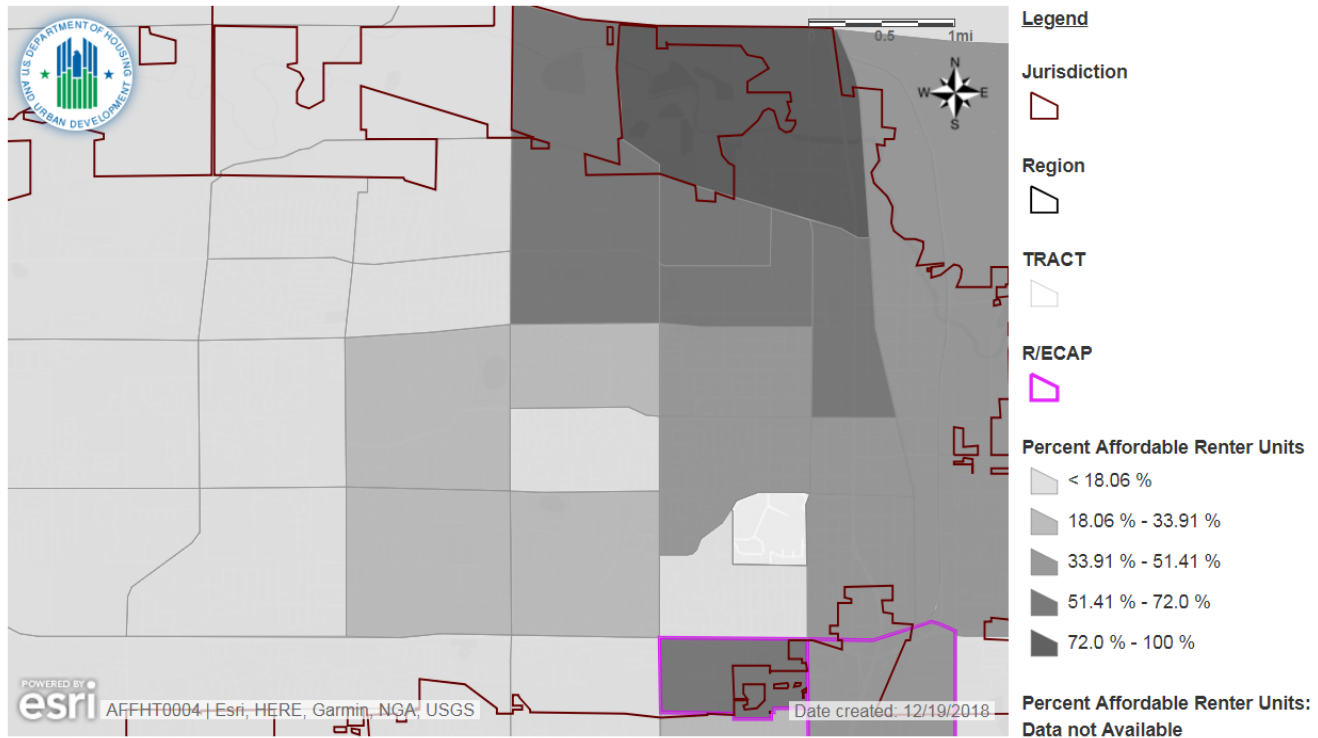
Map 5 – Demographics and poverty

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Map 6 – Location of affordable housing

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



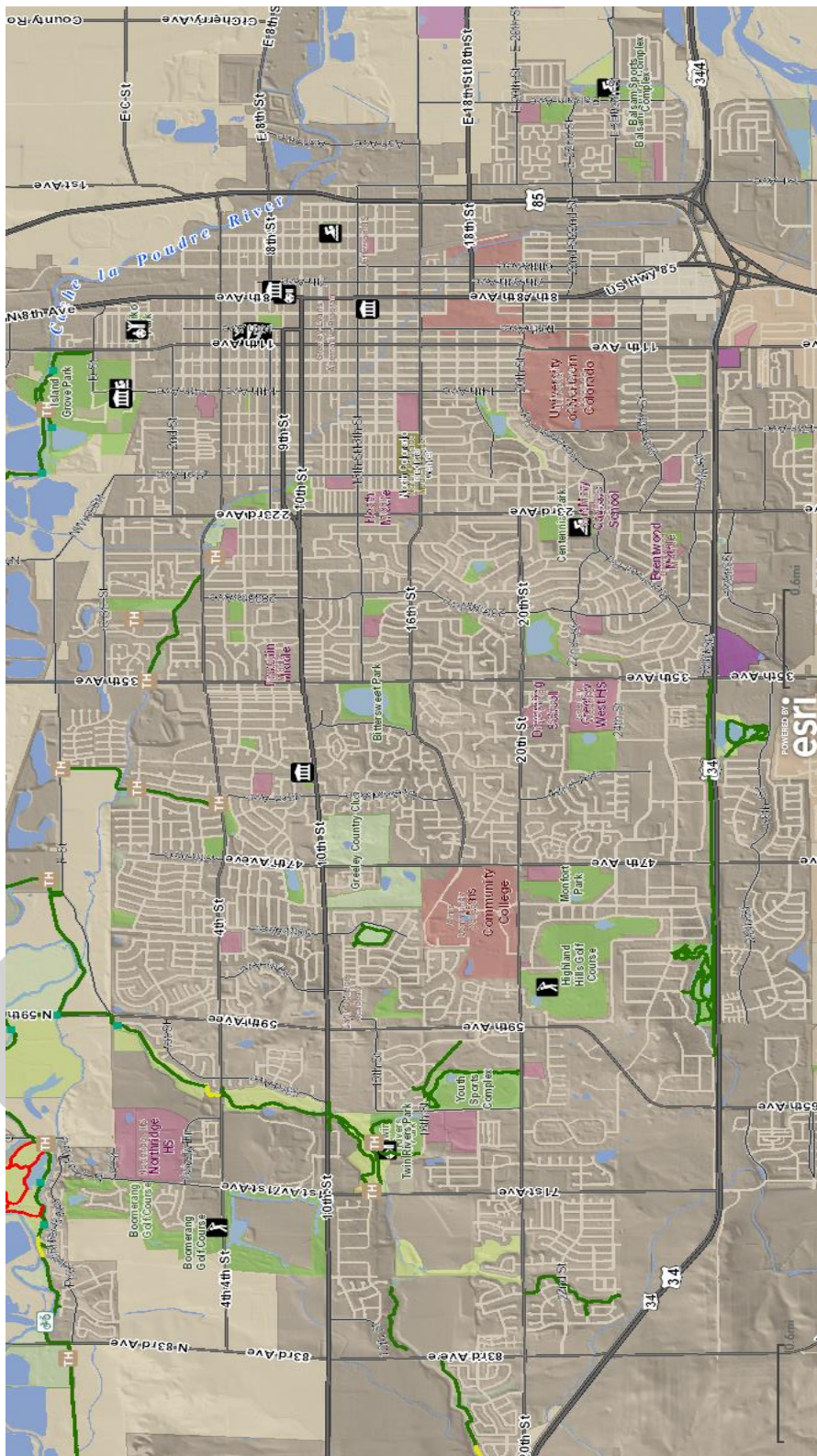
Name: Map 17 - Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

Description: Map of percent of rental units affordable, defined as units renting at or less than 30% of household income for a household with income at 50% of AMI.

Jurisdiction: Greeley (CDBG, HOME)

Region: Greeley, CO

Map 7 - City parks, recreation facilities, and trails

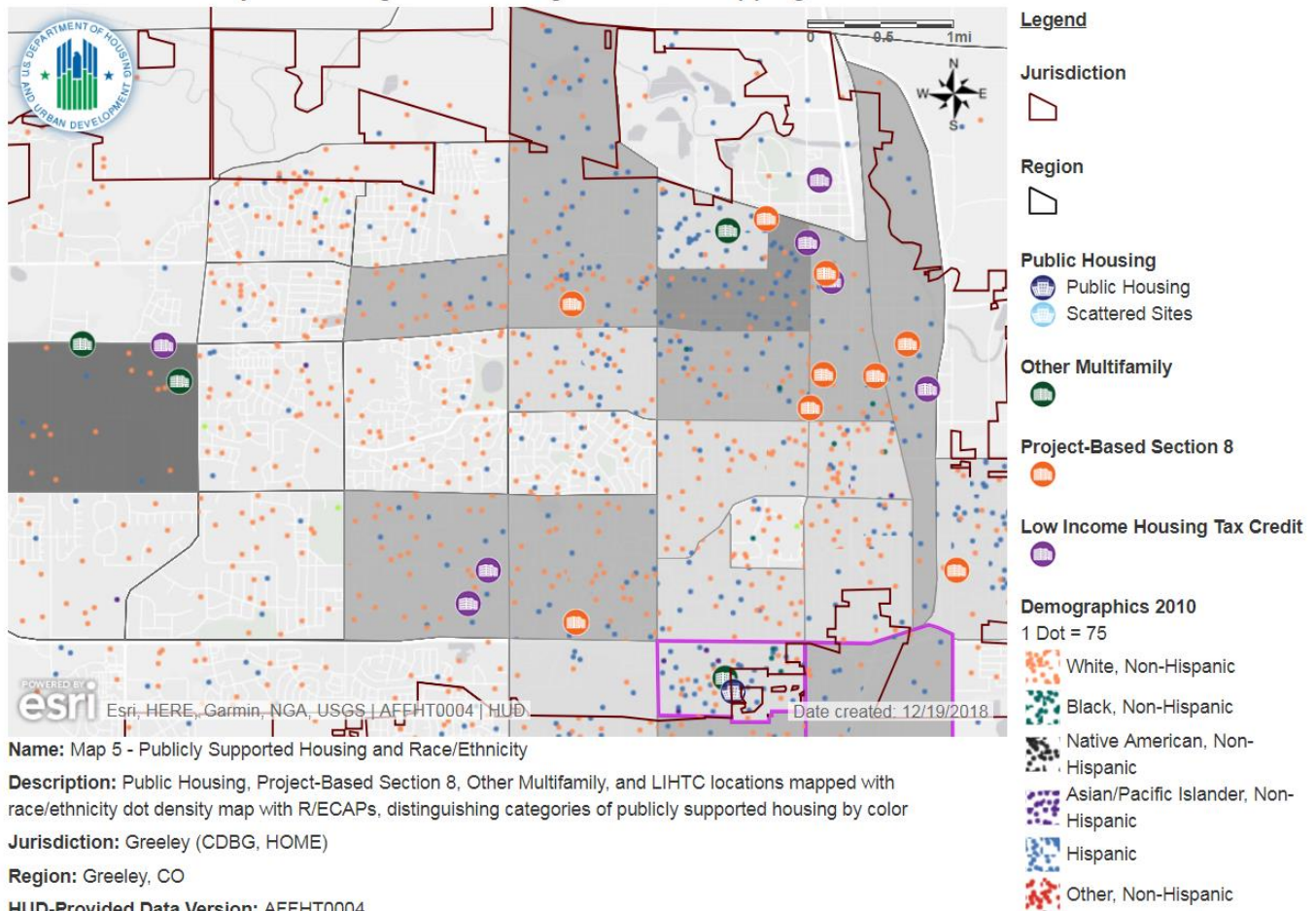


Map 8 – Greeley-Evans Transit (GET) routes



Map 9 – Publicly supported housing and race/ethnicity

HUD Affirmatively Furthering Fair Housing Data and Mapping Tool



Fair Housing Survey for Greeley Residents

The City of Greeley is conducting a study to evaluate fair housing conditions in the community and is interested in gathering information from residents on any experience they may have had with housing discrimination. Your input is needed to provide a clear picture of the situation, which will in turn assist in developing a plan to improve equal and fair housing choice for all residents. Please take a few minutes to fill out this survey. Your answers will be kept confidential. You can also respond to the survey on-line at www.greeleygov.com. For additional information, or to request the survey in a form other than written English or Spanish, please contact: Carol Larsen, 970.336.4166, carol.larsen@greeleygov.com.

1. Please identify the ZIP code of your residence. _____

2. Have you ever encountered any form of housing discrimination in Greeley?

- ☐ YES
☐ NO
☐ NOT SURE

(If YES or NOT SURE, proceed to questions 3-7. If NO, skip to question 8.)

3. If yes, which of the following best describes the person responsible for discriminating against you?

- ☐ A landlord/property manager
☐ A real estate agent
☐ A lending institution
☐ Other: _____

4. Which of the following best describes the location where the act of discrimination occurred?

- | | |
|----------------------------------------------------------------|-----------------------------------------------------------------|
| <input type="checkbox"/> An apartment complex | <input type="checkbox"/> A trailer or mobile home park |
| <input type="checkbox"/> A single-family neighborhood | <input type="checkbox"/> A public or subsidized housing project |
| <input type="checkbox"/> A condominium or townhome development | <input type="checkbox"/> Other |
| _____ | |
| <input type="checkbox"/> When applying for a loan | |

Examples of discrimination include:

- A rental advertisement that says, "Perfect for couples or singles without children" or "No Pets" without an exception for service animals.
- A real estate agent "steers" you to houses in neighborhoods different than the ones you have requested and think you can afford.
- A landlord refuses to let you install a ramp in your shower (at your own accommodation)

TRACT

R/ECAP

Percent Voucher Units

- ☐ < 4.68 %
☐ 4.68 % - 8.13 %
☐ 8.13 % - 12.7 %
☐ 12.7 % - 18.06 %
☐ 18.06 % - 100 %

5. Please explain how you believe you were discriminated against:

6. On what basis do you believe you were discriminated against? Check all that apply:

- | | |
|----------------------------------------------------------|---------------------------------------------------------------|
| <input type="checkbox"/> Race | <input type="checkbox"/> Family Status (e.g. due to children) |
| <input type="checkbox"/> Color | <input type="checkbox"/> Marital Status |
| <input type="checkbox"/> National Origin | <input type="checkbox"/> Disability |
| <input type="checkbox"/> Ancestry | <input type="checkbox"/> Sexual Orientation |
| <input type="checkbox"/> Religion | <input type="checkbox"/> Gender |
| <input type="checkbox"/> Creed | <input type="checkbox"/> Age |
| <input type="checkbox"/> Source of Income (i.e. welfare) | <input type="checkbox"/> Other: _____ |

7. Did you report the incident?

- ☐ YES - If Yes, who did you contact? _____
- ☐ NO - If No, why not?
- | | |
|-----------------------------------------------------|----------------------------------------------------------------|
| <input type="checkbox"/> Don't know where to report | <input type="checkbox"/> Afraid of retaliation |
| <input type="checkbox"/> Too much trouble | <input type="checkbox"/> Don't believe it makes any difference |
| <input type="checkbox"/> Other: _____ | |

8. Have you ever been denied "reasonable accommodation" (flexibility) in rules, policies, or practices that you required to accommodate a disability related to housing?

- ☐ YES ☐ NO

If YES, what was your request? _____

9. Other than those noted in item six, are there other factors that limit your housing options in Greeley? Check all that apply.

- | | |
|--------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> Language barriers | <input type="checkbox"/> Lack of public transportation |
| <input type="checkbox"/> Lack of housing units | <input type="checkbox"/> Housing codes/occupancy limits |
| <input type="checkbox"/> Lack affordable housing | <input type="checkbox"/> Lack of accessible housing |
| <input type="checkbox"/> Income/credit score | <input type="checkbox"/> Community perceptions (of income level, my race/ethnicity, of persons requiring affordable housing, etc.) |

10. How informed are you about housing discrimination laws?

- ☐ Very well informed ☐ A little informed ☐ Somewhat informed ☐ Not informed

11. Do you believe that housing discrimination occurs in Greeley and, if so, what types of discrimination problems do you think are the worst? _____

Your input is greatly appreciated!

Please return the survey by December 1, 2018 to:

Carol Larsen, Greeley Urban Renewal Authority, 1100 10th Street, Suite 201, Greeley, CO 80631
970.336-4166 (phone), 970.350-9895 (fax), carol.larsen@greeleygov.com

Encuesta de equidad de vivienda para residentes de Greeley

La ciudad de Greeley está llevando a cabo un estudio para evaluar las condiciones de vivienda en la comunidad y está interesada en recopilar información de los residentes en cualquier experiencia que puedan haber tenido con discriminación en la vivienda. Tu aporte es necesario para proporcionar una imagen clara de la situación, que ayudará a desarrollar un plan para mejorar la elección de viviendas iguales y justas para todos los residentes. Por favor tome unos minutos para completar esta encuesta. Sus respuestas se mantendrán confidenciales. También puede responder a la encuesta en línea en www.greeleygov.com. Para obtener más información, o para solicitar la encuesta en una forma que no sea escrito inglés o español, por favor póngase en contacto con: Carol Larsen, 970.336.4166, carol.larsen@greeleygov.com.

1. Por favor identificar el código postal de su residencia. _____

2. Se ha encontrado alguna forma de discriminación en la vivienda en Greeley?

- ☐ Sí
- ☐ NO
- ☐ No estoy seguro

(Si sí o no está seguro, vaya a preguntas 3-7. Si NO, pase a pregunta 8.)

3. En caso afirmativo, cuál de las siguientes mejor describe la persona responsable de discriminar contra usted?

- ☐ Un propietario/administrador
- ☐ Un agente de bienes raíces
- ☐ Una institución de prestamos
- ☐ Otro: _____

Ejemplos de discriminación:

- Un anuncio de alquiler que dice: "Perfecto para parejas o solteros sin hijos" o "No mascotas" sin excepción para animales de servicio.
- Un agente de bienes raíces "dirige" viva en vecindarios diferentes de las que ha solicitado y cree que usted puede proporcionar.
- Un propietario le niega a dejarle instalar una rampa en la ducha (por su propia cuenta) para acomodar su incapacidad.

4.Cuál de los siguientes describe mejor el lugar donde se produjo el acto de discriminación?

- ☐ Un complejo de apartamentos
- ☐ Un parque de remolque o casa móvil
- ☐ Un proyecto de vivienda público o subsidiado
- ☐ Un desarrollo de condominio o casa
- ☐ Otro: _____
- ☐ Al solicitar un préstamo

5. Por favor, explicar cómo cree que fue discriminado:

6. ¿En qué cree usted que fue discriminado? Marque todas las que aplican:

- | | |
|------------------------------------------------------------------|----------------------------------------------------------------------|
| <input type="checkbox"/> Raza | <input type="checkbox"/> Situación familiar (por ejemplo, por niños) |
| <input type="checkbox"/> Color | <input type="checkbox"/> Adjetivo marital |
| <input type="checkbox"/> El origen nacional | <input type="checkbox"/> Discapacidad |
| <input type="checkbox"/> Ascendencia | <input type="checkbox"/> Sexual orientar |
| <input type="checkbox"/> Religión | <input type="checkbox"/> Género |
| <input type="checkbox"/> Credo | <input type="checkbox"/> Edad |
| <input type="checkbox"/> Fuente de ingresos (ejemplo, bienestar) | <input type="checkbox"/> Otro: _____ |

7. ¿Reporto el incidente?

- ☐ ¿Sí - si sí, quien contacto? _____
- ☐ NO - Si No, ¿por qué no?
- | | |
|-------------------------------------------------|------------------------------------------------------|
| <input type="checkbox"/> No sabe donde informar | <input type="checkbox"/> Miedo de la represalias |
| <input type="checkbox"/> grande problema | <input type="checkbox"/> No creo que haga diferencia |
| <input type="checkbox"/> Otro: _____ | |

8. ¿Le han negado "ajustes razonables" (flexibilidad) en las normas, políticas o prácticas que se requieren para dar cabida a una discapacidad relacionada con vivienda?

- ☐ Si ☐ No

Si Si, que fue lo que pedía? _____

9. ¿Que no sean las mencionadas en el punto seis, existen otros factores que limitan sus opciones de vivienda en Greeley? Marque todas las que aplican.

- | | |
|--------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> Lenguaje barrera | <input type="checkbox"/> Falta de transporte público |
| <input type="checkbox"/> Falta de unidades de vivienda | <input type="checkbox"/> Límites de los códigos/ocupación vivienda |
| <input type="checkbox"/> Grave falta de viviendas accesibles | |
| <input type="checkbox"/> Ingresos/ crédito <u>puntuación</u> | <input type="checkbox"/> Comunidad perceptions (del nivel de ingresos, mi raza/origen étnico, de las personas que necesitan vivienda, etcetera.) |

10. ¿Que informado está sobre las leyes de discriminación de vivienda?

- | | |
|---------------------------------------------|-----------------------------------------------|
| <input type="checkbox"/> Eso bien informado | <input type="checkbox"/> lo poco informado |
| <input type="checkbox"/> Un tanto informado | <input type="checkbox"/> No informado en todo |

11. ¿Crees que ocurre discriminación en la vivienda en Greeley y, si, ¿qué tipos de problemas de discriminación ¿y que son los peores? _____

¡Su entrada se aprecia grandemente! Por favor devuelva la encuesta por 01 de diciembre de 2018 a:

Carol Larsen, Autoridad de Renovación Urbana de Greeley, 1100 10th Street, Suite 201, Greeley, CO 80631

970.336-4166 (phone), 970.350-9895 (fax), carol.larsen@greeleygov.com