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**Analysis of Impediments
to Fair Housing Choice**

August 2013

*Prepared for the City of Greeley
and Greeley Urban Renewal Authority
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Section One - Executive Summary

This report is the 2013 City of Greeley's Analysis of Impediments to Fair Housing Choice report (AI). It was prepared for the U. S. Department of Housing and Urban Development (HUD). Impediments to fair housing choice are:

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

Fifteen housing discrimination complaints were filed for Greeley properties between FY 2007 and FY 2012, with ten related to the sale of real estate and five related to rental properties. Thirteen of these complaints were based on Hispanic/Latino origin, and the other two were based on disability and familial status. Two of the complaints were successfully resolved, and the others were found to have no cause.

A questionnaire was distributed to gather information about housing in the community, including housing discrimination. Key points from the questionnaire are:

- 168 questionnaires (representing 285 adults and 163 children) were completed, for a 33.0% return rate
- Only two Spanish questionnaires were completed but five people noted they don't speak English, so it is assumed that someone assisted them in completing a survey in English
- Of those completing questionnaires, 31.0% were staying at a shelter, in their car, in a motel, or with friends or family
- Nearly two-thirds are family households and most of these have four or more members
- More than half of the households spend over 50.0% of their income on rent and utilities each month
- People reported discrimination on the basis of disability (30.0%), family size/type (21.0%), race/color (17.0%), national origin and gender (12.0% each), religion and marital status (4.0% each), but no formal complaints were filed by those completing questionnaires

Impediments to Fair Housing Choice

- 1. Housing discrimination:** Housing discrimination appears to be taking place in Greeley in rental housing for persons with disabilities, particularly in reasonable accommodations for rental housing, and for persons of Hispanic/Latino origin. There have also been instances of predatory lending in the sale of houses to persons of Hispanic/Latino origin.
- 2. Language and culture:** Language and culture are barriers to fair housing choice. With the location of refugees in Greeley from many nations, the need for translation services in different

languages and an understanding of cultural differences will continue to increase.

- 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 Fair Housing Action Plan, including recommendations for addressing these impediments, can be found in Section Eight of this report.

SECTION Two - Introduction

A. Fair Housing and Fair Housing Choice

This report is the 2013 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), which requires that communities receiving Community Development Block Grant (CDBG) funds to "affirmatively further fair housing" in compliance with the Fair Housing Act. The City also receives HOME Investment Partnership funds from HUD, which also require that fair housing be affirmatively furthered.

The Federal Fair Housing Act of 1974 (as amended) prohibits housing discrimination based on the protected populations of:

- race
- color
- religion
- sex
- national origin
- mental or physical disability
- familial status

Discrimination is prohibited in the sale or rental of housing; home mortgage lending; and purchase of homeowner's or renter's insurance. It is also against the Fair Housing Act to refuse to make reasonable accommodations for persons that have a disability, or to harass, interfere or retaliate against anyone who exercises their fair housing rights.

The Colorado Civil Rights Act adds marital status, creed, ancestry, and sexual orientation (including transgender status), to the federal protected classes in the area of housing. HUD recently added sexual orientation (gay/lesbian/bi-sexual/transgender) and gender identity as a protected class for all housing with McKinney-Vento funding (homeless housing assistance), as well as other housing assisted or insured by HUD.

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. 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, 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 by reducing and/or eliminating the impediments to fair housing choice that have been identified thru this study. These actions are intended 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; and
- foster compliance with the provisions of the Fair Housing Act.

B. Fair Housing and Affordable Housing

The City’s previous AI included items that were more related to affordable housing, rather than fair housing choice. HUD has provided guidance and clarification that “a barrier to affordable housing is a condition or circumstance that impedes housing choice on an equal opportunity basis” while an impediment to fair housing choice is “a condition or circumstance that impedes housing choice or access to housing based on one or more of the protected classes (or populations) of the Fair Housing Act”. A barrier to affordable housing may also be an impediment to fair housing choice; however, if the barriers to affordable housing are also identified as impediments to fair housing choice, an analysis must be provided to explain how the barrier to affordable housing disproportionately affects members of a protected class.

C. Project Funding & Methodology

The funding for this project was provided by the City of Greeley’s Community Development Block Grant Funds (70%) and HOME Investment Partnership Funds (30%). This report was developed using HUD’s “Fair Housing Planning Guide”, and the methodology used in its preparation consisted of the following steps:

- a. 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 real estate policies.
- b. Interviews conducted with staff and/or representatives of 20 participating agencies and organizations;
- c. Review and analysis of housing discrimination complaint data provided by HUD;
- d. Analysis of the results of a questionnaire distributed to area agencies and organizations to clients and consumers;
- e. Identification of impediments; and
- f. Development of the Fair Housing Action Plan, including recommendations.

The agencies and organizations interviewed are listed below, noted with an asterisk *. Information was obtained from the others listed below from publications and/or websites and used in the preparation of this report.

*A Woman’s Place

Aims Community College

*Catholic Charities Northern – Guadalupe Community Center

City of Evans Building Department

*City of Greeley Building Inspection Office

*City of Greeley Code Compliance Office

*City of Greeley Economic Development Office
 *City of Greeley Neighborhood Resources Office
 *City of Greeley Planning Division
 Colorado Civil Rights Division
 Colorado Department of Education
 Colorado Department of Labor and Employment
 Colorado Department of Local Affairs, Division of Housing
 Colorado Department of Public Health and Environment
 Colorado Legal Services
 *Connections for Independent Living
 Eaton School District
 *First Bank
 *Global Refugee Center
 Greeley Area REALTOR Association
 *Greeley Center for Independence
 Greeley-Evans Transit
 Greeley-Evans School District No. 6
 *Greeley Habitat for Humanity
 *Greeley Housing Authority
 *Greeley Transitional House
 *Home Team Lending
 *Migrant Farm Labor Housing
 National Association of REALTORS
 *North Range Behavioral Center
 *Pro Realty, Inc.
 *Salvation Army
 The Group Real Estate, Inc.
 United States Department of Housing and Urban Development, FHEO, Region VIII
 United Way of Weld County
 University of Northern Colorado
 Weld County Human Services

A questionnaire was developed to gather input from clients and consumers of area housing-related agencies. The questionnaire was available for a period of several weeks and was distributed to 11 agencies, most of whom made great effort to encourage their clientele to participate. Of the 510 questionnaires distributed, 360 were in English and 150 in Spanish. A total of 168 were completed and returned and two of these were in Spanish. The findings from the questionnaire are summarized in Section Four of this report. The following distributed questionnaires:

- A Woman’s Place (domestic violence shelter)
- Connections for Independent Living (disabilities)
- Global Refugee Center
- Greeley Center for Independence (disabilities and acquired brain injury)
- Greeley Housing Authority

- Greeley Transitional House (homeless families)
- Guadalupe Community Center & Shelter (homeless)
- Habitat for Humanity
- Salvation Army

Questionnaires were made available to these agencies; no surveys were returned from them:

- Catholic Charities – Migrant and Farm Labor Housing
- North Range Behavioral Health (mental disabilities)

D. Public Comments

The draft of this report was released to the public on September 12, 2013. A 30-day public comment period was open, from September 12, 2013 through October 12, 2013. The draft report was also sent to all participating agencies that were interviewed and was posted on the City's website (www.greeleygov.com) throughout the 30-day comment period.

The Greeley Urban Renewal Authority Board reviewed the draft at its September 11, 2013 meeting, and the City's Planning Commission reviewed the draft at its September 24, 2013 meeting. The Greeley City Council approved the draft report at the October 1, 2013 City Council meeting. (To be updated as necessary.)

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 2010 -2014 Strategic Consolidated Plan.

Recommendation by Greeley Urban Renewal Authority Board

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

Comments from the Planning Commission

Action by Greeley City Council

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

- (To date, no comments have been received.)

SECTION THREE - Community Profile

The Community Profile is an overview of Greeley's current demographic and economic picture.

A. Demographics

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. Since 2000, Greeley's population has increased by 28.8%, with most of this growth occurring in West Greeley.

Table 1: Population and Growth Rate 2008 - 2013

Year	Population	Growth Rate
2008	90,249	2.8%
2009	91,759	1.2%
2010	94,358*	2.8%
2011	95,517	1.2%
2012	96,093	0.6%
2013	97,248	1.2%

Source: U. S. Census; City of Greeley estimates

*This figure was provided by the City of Greeley and is higher than the Census number of 92,889.

The City's 2013 Annual Growth & Development projections, based on the number of new housing units anticipated each year, show that the population is expected to reach 100,000 by 2015. These projections use an average household size of 2.7 persons, which increased from 2.63 persons per household in 2008.

Table 2: Population Projections 2013 - 2017

Year	Population*
2013	98,729
2014	99,520
2015	100,513
2016	101,820
2017	103,348

*Projections based on 2.7 persons per unit

Source: City of Greeley 2013 Annual Growth & Development Projections Report

The median age in Greeley is 29.8 years, up from 28.5 years a decade earlier. Gender has shifted slightly toward an increase in males, and the baby boomer generation and their children continue to make up the largest segments of the Greeley population. College students, typically between the ages of 18 and 24 years, account for 12.0% of the population.

Table 3: Age and Gender of Population: 2000 & 2010

AGE	2000 - #	2000 - % of total Pop	2010 - #	2010 - % of total Pop
Total Population	76,930	100.0%	92,889	100.0%
Under 5 years	5,734	7.5%	7,221	7.8%
5-9 years	5,604	7.3%	6,784	7.3%
10-14 years	5,293	6.9%	6,096	6.6%
15-19 years	7,869	10.2%	8,944	9.6%
20-24 years	9,830	12.8%	10,622	11.4%
25 – 34 years	10,987	14.3%	12,929	14.0%
35 – 44 years	9,992	13.0%	10,699	11.5%
45 – 54 years	8,791	11.4%	10,533	11.3%
55 – 59 years	2,815	3.7%	5,018	5.4%
60 - 64 years	2,204	2.9%	4,089	4.4%
65 - 74 years	3,804	4.9%	5,027	5.4%
75 - 84 years	2,830	3.7%	3,328	3.6%
85 years and over	1,177	1.5%	1,599	1.7%
Gender				
Females	39,232	51.0%	47,255	50.9%
Males	37,698	49.0%	45,635	49.1%
Median Age	28.5 years		29.8 years	

Source: U. S. Census – 2000, 2010

Between 2000 and 2010, the African American/Black population had the largest growth, with an increase of 130.0%. Much of this growth came from the East African refugees who have settled in Greeley in the past five years. The Hispanic/Latino and Asian populations also had significant increases of 47.4% and 40.7% respectively. During this same period, the Caucasian/White population dropped by 1.3%. The non-white races represent relatively small percentages of the total population, but their increases reflect the growing diversity in the community. Colorado in 2010 included a Hispanic/Latino population of 20.7% (compared to 36.0% in Greeley), and the percentage of Asian (2.8%) and African American/Black (4.0%) populations in Colorado were more than double that of Greeley.

Table 4: Race and Ethnicity of Population: 2000 & 2010

Race/Origin	Pop 2000 - % of Pop	Pop 2010 - % of Pop	% Increase Since 2000
Asian	885 - 1.1 %	1,245 - 1.3%	40.7%
African American/Black	672 - 0.9%	1,543 - 1.7%	130.0%
Caucasian/White	61,853 - 80.4%	73,485 - 79.1%	18.8%
Native American	639 - 0.8%	1,096 - 1.2%	71.5%
Pacific Islander	106 - 0.1%	111 - 0.1%	4.7%
Other/Mixed Races	12,775 - 16.7%	15,409 - 16.6%	20.6%
TOTAL Population	76,930 100.0%	92,889 100.0%	-----
Hispanic/Latino origin	22,683 29.5%	33,440 36.0%	47.4%

Source: U. S. Census 2000 & 2010

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 population city-wide in 2010 was 1.3% (see Table 4 above), so a concentration would be a tract that has an Asian population of at least 2.6%. Greeley has six tracts where Asian populations are concentrated (2, 10.03, 14.09, 14.13, 14.16, 14.17); three tracts of African Americans/Blacks (1, 4.02, 11); Native Americans have two tracts (1, 4.01); Pacific Islanders have three (only three tracts have this

population); and Hispanic/Latino populations are concentrated in four Census Tracts (5.01, 6, 7.01, 7.03). The tracts with concentrated populations are noted on the table below with an asterisk *. There are four tracts city-wide with a concentration of at least two different races or Hispanic/Latino populations (1, 4.02, 6, 14.17). The majority of these tracts are found east of 23rd Avenue and north of Highway 34. Map 1 in the Appendix shows Census Tract locations and Map 2 illustrates the locations of racial and ethnic minority concentration.

Table 5: Percent of Population by Race and Ethnicity by Census Tract: 2007 - 2011

Census Tract	% Asian	%African American	%Caucasian/ White	%Native American	%Pacific Islander	%Hispanic/ Latino Origin
1	0.6	8.4*	76.9	3.2*	0	46.4
2	4.4*	1.0	86.1	0.6	0	27.5
3	1.3	0.4	89.5	0.5	0	8.9
4.01	0.3	0	93.7	2.8*	0	14.8
4.02	1.7	5.6*	83.3	1.0	0.6*	46.8
5.01	0.4	0	73.5	1.3	0	82.0*
5.02	0.4	0	78.6	0.1	0	64.9
6	0	3.3	80.8	1.7	1.8*	74.0*
7.01	0.8	0	71.1	0.4	0	76.8*
7.03	0	2.3	83.4	0.9	0	73.1*
7.04	0	0	97.7	0	0	9.1
8	1.8	0.1	89.5	0.7	0	38.9
9	0.2	0	85.8	0	0	26.4
10.03	4.0*	0.2	77.4	0.3	0	57.0
11	0	3.5*	85.2	1.1	0	30.1
12.01	1.4	0	81.1	1.8	0	33.6
12.02	1.1	1.4	89.3	0.4	0	19.3
13	0.1	0.2	87.7	0.9	0	60.9
14.06	1.0	2.7	87.3	0	0	23.5
14.07	0.2	0	98.7	0	0	3.9
14.08	0	0	100.0	0	0	6.3
14.09	11.0*	0.4	86.4	0	0	16.8
14.10	0	0	94.9	0.2	0	1.0
14.11	0	2.8	92.0	0	0	19.3
14.12	0	1.1	97.1	0	0	6.6
14.13	3.2*	0	88.5	0	0	47.8
14.14	0	0	90.4	0.8	0	29.1
14.15	0	2.0	95.4	0	0	14.4
14.16	2.9	0	96.5	0	0	12.1
14.17	15.0*	0	83.0	0	0.3*	19.9

Source: 2007 - 2011 American Community Survey (“Other race” & “More than one race” populations not included)

The 2009 – 2011 American Community Survey showed a decrease by nearly 3,000 in the number of people who reported having a disability since the 2000 Census. This decrease is not consistent with state or national data, where numbers have been increasing. This decrease in Greeley may be due to the use of population estimates in the American Community Survey. Also, war veterans returning home with disabilities are primarily in the 18 – 40 range, so the number of people with disabilities within this age group is expected to increase, as are older age groups.

Table 6: Disability Status of Population: 2000 & 2007 - 2011

Status	2000*	2007 - 2011
Total population	76,930	92,889
Under 18/20 years	21,500	24,595
With a disability	1,926	959
18/21 - 64 years of age	41,052	58,022
With a disability	7,843	5,922
65 years and over	7,231	8,742
With a disability	3,306	3,436
Total Population with a Disability	13,075	10,317

Source: U. S. Census – 2000, American Community Survey 2009 - 2011

*Data from 2000 Census was collected using different age ranges (5 – 20; 21 – 64; and 65 and over). The 2007 – 2011 American Community survey used the ranges reflected in this table (under 18; 18 – 64; and 65 and over).

B. Income

The average weekly and annual wages in the Greeley-Weld County area have increased by 2.7% since 4th quarter of 2011, driven by the higher wages paid by the oil and gas industry, as well as the addition of other higher-paying jobs in the community in the past several years. The Greeley-Weld County average weekly wage of \$831 by the end of 2012 contrasts with the average weekly wages of Colorado at \$656 and the U.S. weekly wage of \$663.

Table 7: Weld County Average Weekly and Annual Wage: 4th Quarter 2012

Industry	Average Weekly Wage	Average Annual Wage
Mining and logging	\$1,173	\$60,996
Trade, transportation, utilities	\$781	\$40,612
Construction	\$1,018	\$52,936
Manufacturing	\$847	\$44,044
Information	\$807	\$41,964
Financial activities	\$1,049	\$54,548
Professional and business services	\$941	\$48,932
Education and health services	\$767	\$39,884
Leisure and hospitality	\$275	\$14,300
Other services (excluding public admin)	\$599	\$31,148
Public administration	\$851	\$44,252
Unclassified	\$950	\$49,400
Total all industries – 4th qtr. 2012	\$831	\$43,212
Total all industries – 4th qtr. 2011	\$809	\$42,068

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

The Area Median Income (AMI) in Greeley/Weld County for FY 2012 AMI for Greeley-Weld County rose to \$68,400 and has since dropped for FY 2013 to \$66,300. These figures are based on a family size of 4 persons. In FY 2011, this figure was \$67,500. (Note: the FY 2011 figure is used in the table on the next page since the data is for 2007 – 2011). More than 14,800 households earn less than 30% AMI, with more than 5,600 of these being renter households. As earlier noted, college students account for 12% of Greeley’s population. Starting with the 2010 census, the Census Bureau asked that students be counted where they were living (at school) on April 1st of that year, rather than where their parents reside, (as had been done on all previous decennial censuses). Therefore, if a college student received and completed a census form, their income (or lack thereof) would be considered in the overall income levels of Greeley, as would any other community resident.

Table 8: Household by Type and AMI: 2007 - 2011

AMI Range	Income	# Owners*	# Renters*
Less than 15%	Less than \$10,125	0	1,564
15.0 – 19.9%	\$10,125 - \$13,500	4,562	1,212
20.0 – 24.9%	\$13,500 - \$16,875	2,492	1,565
25.0 – 29.9%	\$16,875 - \$20,250	2,073	1,335
30.0 – 34.9%	\$20,250 - \$23,625	1,114	1,293
35.0% or more	More than \$23,625	4,176	5,995
FY 2011 AMI = \$67,500		14,417 households	12,964 households

Source: 2007–2011 American Community Survey Note: Data represents occupied units and owners with a mortgage

The median household income in Greeley was \$44,071 (inflation-adjusted dollars) in 2011. With the exception of Asian households, all others were significantly below the median household income of Caucasian/White households. African American/Black households have the lowest median income. Poverty rates are highest for Pacific Islanders, followed by Native Americans and African American/Blacks.

Table 9: Median Household Income and Poverty by Race & Ethnicity – 2007 - 2011

Race/Ethnicity	Median Household Income	Poverty Rate
Greeley Median Household Income	\$44,071	22.7 %
African American/Black	\$19,033	39.3%
Asian	\$64,375	14.5%
Caucasian/White	\$44,822	22.6%
Native American	\$24,447*	49.8%
Pacific Islander	No data available	63.3%
Other Race	\$41,467	20.7%
More than one Race	\$33,533	16.5%
Hispanic/Latino	\$32,944	33.3%

Source: 2007 - 2011 American Community Survey *This figure is from the 2006 – 2010 ACS (where data is not available, it is due to the lack of a large enough sample size)

Poverty in 2011 was a household income of less than \$11,491 for one person and \$23,018 for a 4-person household. Twenty percent of all people over the age of 18 were living in poverty between 2007 and 2011 in Greeley. Nearly 60.0% of households headed by single females with children under the age of five were living in poverty.

Table 10: Families and Households Living in Poverty: 2007 - 2011

Family Type	Percent Living in Poverty
All Families	15.2%
w/children under 5 years of age	27.9%
Married Couple Households	9.3%
w/children under 5 years of age	16.0%
Female Headed Households	38.1%
w/children under 5 years of age	59.7%
Under 18 years of age	29.7%
w/children under 5 years of age	37.0%
18 years and over	20.0%
18 – 64 years of age	21.7%
65 years and over	9.5%

Source: 2007 – 2011 American Community Survey

C. Employment

The unemployment rate for the Greeley Metropolitan Statistical Area (MSA) for 2012 (not seasonally adjusted) was 8.7%. By the end of May 2013, this rate had dropped to 7.1%. The Colorado unemployment rate was 6.9% with the national rate at 7.6% during this same period. The Greeley civilian labor force of those over the age of 16 numbered 46,355 people in 2010 and of these, 60.0% were Caucasian/White and nearly 30.0% were Hispanic/Latino.

Table 11: Civilian Labor Force by Race/Ethnicity – 2006 - 2010

Race	Number	% of Workforce
African American/Black	585	1.3%
Asian	785	1.7%
Caucasian/White	30,590	66.0%
Native American	220	0.5%
Pacific Islander	25	0.1%
Other Race	145	0.3%
Mixed Race	270	0.5%
Hispanic/Latino	13,735	29.6%
TOTAL	46,355	100.0%

Source: 2006 – 2010 American Community Survey

The largest employers located in Greeley represent a variety of industries. Oil and gas development in Weld County has recently seen a resurgence and is affecting local employment and wages in a positive way, although industry employees are filling area rental units and hotel/motel rooms, which are contributing to the low vacancy rate.

Table 12: Largest Employers Located in Greeley: 2012

Employer	# Employees	Industry Type
JBS Swift & Company	4,500	Beef processing
Banner Health: North Colorado Medical Center	3,000	Healthcare
Greeley-Evans School District 6	2,100	Education
State of Colorado (includes UNC)	2,000	Government & education
State Farm Insurance Companies	1,460	Insurance
Weld County	1,383	Government
Aims Community College	874	Education
City of Greeley	859	Government
TeleTech	500	Financial services support
Halliburton Energy Services, Inc.	430	Oil & gas development
Noble Energy	400	Oil & gas development
McLane Western	390	Grocery warehouse/distribution
StarTek, Inc.	370	Outsourcing service provider
Leprino Foods	350	Food production
Evangelical Lutheran Good Samaritan Society	330	Retirement & long-term care services

Source: Upstate Colorado Economic Development 2012 Economic Profile; City of Greeley Comprehensive Annual Financial Report; Greeley-Evans School District 6; 2013 City of Greeley Annual Growth & Development Projections

Additional job creation is anticipated in Greeley between 2013 and 2014 with an estimated 350 – 500 new primary jobs. These positions are expected to be in the oil and gas industry. During the period between 2011 and 2014, the City of Greeley estimated that 1,825 – 2,510 new primary jobs and 125 – 200 new secondary jobs will be created.

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 Greeley and Weld County. This office is located at the Weld County offices in North Greeley and is accessible by bus and close to the Guadalupe Community Center and Shelter. Other area organizations provide skills training and/or assistance specific to their clients and consumers in finding employment, including Connections for Independent Living and Greeley Transitional House, which are both located in downtown Greeley on the bus routes. The Weld Project Connect event also provides employment assistance thru referrals to persons that attended this annual event.

D. Housing

The growth of new housing units in Greeley in the past five years has been modest with 359 new units since 2008. City staff expects steady growth in the number of housing units projected over the next four years, with the majority expected to be multi-family units. Based on building permits issued through July 31, 2013, the number of new housing units is expected to reach or exceed 300 new units for the year.

Table 13: Housing Units and Projected Growth: 2007 - 2017

Year	Number of Housing Units	Growth Rate %
2008	36,076	0.25%
2009	36,113	0.10%
2010	36,189	0.21%
2011	36,231	0.12%
2012	36,313	0.23%
Projected Additional Housing Units & Growth Rate: 2013 - 2017		
2013	36,566	0.24%
2014	36,859	0.5%
2015	37,227	1.0%
2016	37,711	1.3%
2017	38,277	1.5%

Source: City of Greeley 2013 Annual Growth & Development Projections Report

The majority of housing units in Greeley, 65.4%, are single-family units. The low vacancy rates are fueling interest in the construction of additional multi-family units.

Table 14: Housing Units by Type: 2013

Type	Number of Units	Percentage of Total Units
Single-family	23,743	65.4%
Multi-family	12,581	34.6%
TOTAL	36,324*	100.0%

Source: City of Greeley 2013 Annual Growth and Development Projections Report
 *This number was provided by City staff and is higher than the 2010 Census number of 33,427

Household composition has moved toward an increase in single-parent households, with the largest rate of increase evident in male single-parent households.

Table 15: Occupied Household Composition: 2000 & 2010

Household Type	2000	2010	Percent Change
Married couples	13,452	15,600	16.0%
Female-headed single parent	2,983	3,889	30.4%
Male-headed single parent	1,248	1,806	44.7%
Non-family households	9,964	11,970	20.1%
Total Households	27,647	33,265*	20.3%

Source: U. S. Census 2000; U. S. Census American Community Survey, 2007 – 2011

*This figure represents “occupied” households

Owner-occupied households have reached 58.7% of all households. With the exception of Caucasian/ White and Asian households, people of other races and ethnic groups tend to occupy rental units rather than as owner-occupants.

Table 16: Tenure of Households by Race/Ethnicity: 2007 - 2011

Race/Ethnicity	% Owner-Occupied	% Renter Occupied
African American/Black	0.5%	2.1%
Asian	1.4%	1.2%
Caucasian/White	91.0%	87.3%
Native American	0.6%	1.5%
Pacific Islander	0	0.1%
Other Race	5.3%	5.8%
Mixed Race	1.2%	2.0%
TOTAL # of Units	19,536	13,729
Hispanic/Latino	21.4%	36.1%

Source: 2007 – 2011 American Community Survey

The average sales price of a home in the Greeley-Evans area dropped in 2009 and has continued to rise or remain stable since, with the largest rate of increase between 2011 and 2012.

Table 17: Greeley-Evans Average Home Sales Prices: 2008 - 2012

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

Source: The Group, Inc. Real Estate Insider

Between 2008 and 2012, building permits were issued for over 350 new housing units and through July 2013, permits had been issued for 108 new multi-family units and 66 new single-family units. Nearly 900 additional housing units, primarily multi-family units, are under review by the City’s Planning office, along with 26 new assisted living units.

Table 18: New Residential Construction: 2008 - 2013

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
TOTAL	276	83	359 Total over 5 Years
Thru 7/31/13	66	108	174 YTD

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

In 2012, the number of foreclosures filed dropped to the lowest number in six years. Job losses and adjustable rate mortgages caused many of the foreclosures in Weld County. Many homeowners who lost their homes to foreclosure may now be living in rental units, adding to the low vacancy rate.

Table 19: Foreclosures in Weld County: 2007 - 2012

Year	Foreclosure Filings	Sales of Foreclosed Homes
2007	2,869	1,919
2008	2,824	1,555
2009	3,354	1,615
2010	2,757	1,721
2011	1,919	1,270
2012	1,579	938
2013 – thru July 31	527	384

Source: Weld County Public Trustee, Colorado Division of Housing

The average rent for a two-bedroom apartment rose to \$682 by Spring of 2013 and the average vacancy rate for all apartments was at 3.3%. Vacancy rates under 5.0% mean competition for rental units is very high.

Table 20: Average Vacancy Rate and Rent: 2008 - 2013

Year	Average Vacancy Rate	Average Rent: 2 bedroom Apartment
2008	9.1%	\$629
2009	7.8%	\$635
2010	8.6%	\$647
2011	5.6%	\$648
2012	4.6%	\$663
2013	3.3%	\$682

Source: City of Greeley 2013 Multi-Family Housing Vacancy Survey

HUD's 40th Percentile Fair Market Rents (FMR) for existing housing for FY 2013 are higher than the average rent for all but one-bedroom units; however, if utility costs are additional costs added in, local apartments may not be affordable for many households. 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).

Table 21: 40th Percentile Fair mark Rent & Average Rent: 2013

Unit Type	40 th Percentile Fair Market Rent	Average Monthly Rent
Efficiency	\$479	\$444
1-Bedroom	\$560	\$561
2-Bedroom	\$720	\$682
3-Bedroom	\$1,056	\$822
4-Bedroom	\$1,275	\$1,094

Source: HUD Fair Market Rents Final Table FY 2013; City of Greeley 2013 Multi-Family Housing Vacancy Study

The most common size of housing unit in Greeley is the three-bedroom unit. Most of these are found in single-family residences, as are four and five or more bedrooms. For apartments, two-bedrooms are the most commonly found size.

Table 22: Housing Units by Number of Bedrooms – 2007 - 2011

Number of Bedrooms	Number of Housing Units of Corresponding Size	% of Housing Units
0 bedrooms	674	1.8%
1 bedroom	3,840	10.5%
2 bedrooms	10,407	28.5%
3 bedrooms	11,359	31.2%
4 bedrooms	6,782	18.6%
5+ bedrooms	3,411	9.4%
TOTAL	36,473	100%

Source: 2007 – 2011 American Community Survey

The Multi-Family Housing Vacancy Survey showed 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). These are some of the older areas and are also areas that have fewer multi-family units. Housing prices mirror rental rates, as the newer housing in West Greeley is higher priced and existing, older homes near downtown and in North Greeley are typically priced lower. The older areas in and around downtown and in North Greeley were zoned and developed in traditional, single-family detached housing, with some limited redevelopment occurring in recent years. The newer areas of the community to the west of 35th Avenue were zoned for and developed in a greater mix of housing types and is where many newer apartment complexes are found.

The new more affordable housing is being built by Habitat for Humanity in North Greeley; Accessible Space, Inc. (ASI); and by GURA through its Homes Again Purchase Program and at Camfield Corner in North Greeley. Habitat has completed 100 homes in its 25-year life in the Greeley Community. There are 15 lots left at the Habitat North Subdivision, and Habitat expects to build 3-5 homes each year to complete this development. 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 is planning a third location, known as Chinook Wind Apartments and adjacent to Twin Rivers, which will offer 60 units for seniors and persons with disabilities. These three locations are in West Greeley. Other housing for persons with disabilities is at the Camelot Apartments, 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. Housing units for families, of up to three-bedrooms, can be found in some of the Housing Authority apartments, as well as in other area apartment complexes. Larger units are usually only found in single-family detached housing. Map 3 in the Appendix shows the locations of the Housing Authority's housing units and Map 4 shows housing for persons with disabilities.

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's Homes Again Purchase Program rehabilitates homes that have either been relocated or purchased while in foreclosure for sale to qualified low and moderate-income families. GURA also operates the Housing Rehabilitation and Weatherization program, which assists low and moderate-income homeowners in making improvements to meet City Code or for increased energy efficiency. GURA's Urban Homesteading program supports the conversion of rental properties to owner-occupied homes with low-interest loans. Through the Neighborhood Stabilization Programs 1 and 3 (NSP1, NSP3), GURA will rehab and resell 30 foreclosed properties in Greeley/Evans; Habitat will rehab/resell an additional 11. Also, purchased from foreclosure and then rented under the NSP1 was a four-plex unit in Evans and a 14-bedroom house, which was transferred to North Range Behavioral Health with bedrooms for rent to persons with mental disabilities. Buyers and tenants had to income qualify under the programs' regulations.

Several housing units were demolished in the past five years, all of which were vacant and uninhabitable at the time of demolition. Three of these were reconstructed by GURA under its Neighborhood Stabilization Program (NSP) and one was reconstructed by Habitat for Humanity under NSP. Three houses are scheduled to be demolished in prior years and will be reconstructed in 2014 by GURA thru its Homes Again Purchase Program, funded through the City's CDBG program. There has not been any displacement as a result of the closure of any mobile home parks in Greeley.

The City of Greeley has adopted and uses an Anti-Displacement and Relocation Assistance Plan that requires reasonable steps to be taken to minimize displacement of people from their homes as a result of an assisted project. 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. The CCRD fields an average of about 800 complaints of discrimination statewide annually, with about 1.0% of these related to housing. The majority of complaints are related to employment.

Between FY 2007 and FY 2012:

- A total of 15 housing discrimination complaints were filed in Greeley
- 13 of the complaints were based on Hispanic/Latino origin (10 of these were related to the sale of property and 3 to rental properties)
- Complaints related to the sale of property included discriminatory advertising, financing and loan terms
- Two complaints were based on familial status (1) and physical disability (1) and were successfully resolved)
- All but 2 complaints were found to have “no cause” determinations

A summary of data regarding the housing discrimination complaints is on the table on the next page.

Table 23: Housing Discrimination Complaints: FY 2007 – FY 2012

Year	Number	Basis/Issues*	Status
FY 2007	11	10 Hispanic origin 1 Familial status 1 Refusal to rent 6 Discriminatory advertising 3 Discriminatory advertising – for sale 7 Selective use of advertising 9 Discriminatory financing 4 Discrimination in making loans 6 Discrimination in terms, conditions of loans 1 Discrimination in selling real estate 10 Discrimination in terms relating to sale 10 Otherwise deny or make housing unavailable 1 Discriminatory acts under Section 818 (coercion)	10 No cause determination – 10 cases closed (Note: these cases may have been related to a criminal case of predatory lending successfully prosecuted by the Weld County District Attorney's Office in 2009) 1 Conciliation/settlement successful – case closed
FY 2008	1	1 Physical disability 1 Failure to make reasonable accommodation	1 Withdrawn after resolution – case closed
FY 2009	0	----	----
FY 2010	1	1 Hispanic origin 1 Refusal to rent	1 No cause determination – case closed
FY 2011	0	----	----
FY 2012	2	2 Hispanic origin 2 Refusal to rent 1 Disc. acts (coercion) 1 Disc. terms, conditions	2 No cause determination – cases not closed as of July 2013
TOTAL	15	13 Hispanic origin 1 Familial status 1 Physical disability	13 No cause determination 1 Conciliation/settlement successful 1 Withdrawn after resolution (13 cases closed/2 have not been closed)

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

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

Housing discrimination complaints filed in Greeley in the past decade have tended to reflect an increased number of complaints related to disabilities, and in particular, physical disabilities. Persons that have a mental disability may also face housing discrimination; however, their disability may not be readily apparent to prospective landlords. Staff of North Range Behavioral Health noted that their clients often have a difficult time finding rental housing because of past history related to damage they may have caused where they lived, as well as police calls made as a result of behavioral concerns.

Discrimination complaints filed during the past six years reflect an increase in the number of complaints based on Hispanic origin. The majority of these complaints may have been related to a criminal case of predatory lending that was prosecuted by the Weld County District Attorney’s office in 2009.

C. Questionnaire Results

To gather additional information about whether housing discrimination is occurring in Greeley, a questionnaire was distributed to clients and consumers of 11 local non-profits that provide housing or related services, as well as the Housing Authority. A total of 168 questionnaires were returned for a 33.0% return rate. These questionnaires revealed that people believe they have been denied housing on the basis of disability, family size/type, race/color, national origin, gender, marital status and creed.

Although 21 people believe they experienced housing discrimination in Greeley, none filed a housing discrimination complaint. The reasons why included: they didn’t think they had a complaint; they didn’t know how to file; they didn’t have time; and they didn’t think their complaint would be taken seriously. One person noted that they couldn’t find an attorney that would take their case. The information gathered by the questionnaire shows that more instances of housing discrimination may be occurring in the community than what is reported to HUD or CCRD. The information below summarizes the responses to each question.

Q1: What type of housing are you living in now?

Type	Apartment	House Rent/Own	Motel	Mobile home Rent/Own	Car, shelter, or campground	Family	Friend	Other
Number	54	28R / 12O	1	6R / 2O	40	8	3	14
Percent	32%	17% / 7%	0.5%	0.4% / 1%	24%	5%	1.5%	8%
Other: assisted living								

Q2: How long have you lived there?

Time	< 3 months	3-6 months	6-12 months	1-2 years	3-5 years	> 5 years
Number	43	19	21	17	32	36
Percent	26%	11%	13%	10%	19%	21%

Q3: Including you, how many people live in this housing?

# of Persons	1	2	3	4	5+
Number	63	21	15	22	45
Percent	38%	13%	9%	13%	27%
Adults	Over 18				
Number	285				
Percent	64%				
Age of children	5 & less	6-11	12-15	16-18	Total
Number	53	67	23	20	163
Percent	33%	41%	14%	12%	36%
Note: not all questionnaires provided a response to this question					

Q4: How many bedrooms does this housing have?

	1	2	3	4	5+
Number	70	44	34	9	9
Percent	42%	27%	21%	5%	5%
<i>Do you feel you are living in overcrowded conditions?</i>					
Yes: 36 / 24% No: 113 / 76% One response noted their housing unit to be unsafe					
Note: not all questionnaires provided a response to this question					

Q5: What percentage of your income is spent on rent and utilities each month?

	Up to 30%	30 – 50%	50 – 75%	More than 75%
Number	32	29	58	16
Percent	23%	21%	41%	11%
6 questionnaires (or 4%) responded that the household had not income				
Note: not all questionnaires provided a response to this question				

Q6: Have you ever been denied housing in Greeley for any of the following reasons?

	Race or color	Nat. origin	Gender	Family size or type	Disability - physical or mental	Religion	Creed*	Marital Status*	Ancestry*	Sexual Orient
Number	3	0	3	5	12	0	1	6	1	0
Percent	10%	0	10%	16%	39%	0	3%	19%	3%	0
Note: not all questionnaires provided a response to this question * Colorado protected populations										

Q7: Have you ever felt discriminated against when buying and/or leasing housing in Greeley?

	Yes	No					
Number	21	119					
Percent	15%	85%					
<i>If yes, why do you think discrimination occurred?</i>							
	Race or color	National origin	Gender	Family size or type	Disability	Creed	Marital status
Number	4	3	3	5	7	1	1
Percent	16%	13%	13%	21%	29%	4%	4%
3 questionnaires included responses for housing discrimination that are not related to a protected class. These were gang affiliations and credit score.							
Note: not all questionnaires provided a response to this question							

Q8: Did you file a housing discrimination complaint?

	Yes	No		
Number	0	35		
Percent	0	100%		
<i>If no, why not?</i>				
	Didn't think I had a complaint	Didn't know how to File a complaint	Didn't have the time/didn't want to file a complaint	Other
Number	14	5	2	2
Percent	61%	22%	8%	8%
Other: landlord wouldn't pay for equipment for reasonable accommodation; manager didn't take my claim seriously; couldn't find a lawyer to take my case				
Note: not all questionnaires provided a response to this question				

Q9: Have any of the following things ever been a problem for you when looking for housing to rent or buy in Greeley?

	Income is too low	Can't afford deposit	Have credit history issues	Lack of housing affordable to rent	Lack of housing affordable to buy	Don't have own transportation
Number	63	43	26	34	13	23
Percent	26%	18%	11%	14%	5%	9%
	Housing is too far from bus route	Housing is too far away from work	Non-English speaking, language barriers	No bus service near home, work or services	Housing too small or too big for my family	Landlord refused to make accommodation
Number	5	3	5	7	12	6
Percent	2%	1%	2%	3%	5%	2%
	Other					
Number	5					
Percent	2%					
Other: 1 response of no rental history; 4 responses related to being disabled, eligible for SSI						
Note: 25 questionnaires reported not having any problems related to looking for housing in Greeley						
Note: most questionnaires reported multiple problems in finding housing						

C. Fair Housing Discrimination Suits

There 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 2060 Comprehensive Plan's vision is:

"Greeley promotes a healthy, diverse economy and high quality of life responsive to all its residents and neighborhoods, thoughtfully managing its human and natural resources in a manner that creates and sustains a safe, unique, vibrant and rewarding community in which to live, work and play".

The plan encourages a variety of residential densities, from 1-3 units per net acre, up to over 12 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 are included in the Plan and encourage the retention of Downtown as the community focal point; encourage stability and reinvestment in established areas and distinct neighborhoods; sustain 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.

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 a dwelling unit that is not a multi-family (i.e. a single-family home, single-family attached or townhome unit, or duplex unit). 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 Building Inspection office when a complaint is made; however, there have been few complaints made and this is a difficult issue to document.

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 (8) 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, or 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. Group homes for more than eight residents are allowed in, but require special review approval in the High Density Residential and the Commercial districts. The separation spacing results in group homes being dispersed rather than concentrated in one location.

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 the costs for utilities and streets to serve a lot or development. These costs are passed on to the home buyer 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. Property within the Redevelopment District is exempt from paying the neighborhood park fee, which reduces this total by about \$1,100 per house. This zone is generally the area lying between U. S. Highway 85 and 35th Avenue, and between O Street and the city's southern limits, which is primarily older areas of the community. 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 process 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 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 5 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.

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

One of the Greeley City Council’s priorities is to “develop and sustain neighborhoods that reflect a safe, attractive, and appealing place to live”. The City’s Community Development Block Grant (CDBG) funds have been used for projects that help achieve this priority, to revitalize neighborhoods and assist with the cost of public improvements in the City’s target neighborhoods. Property acquisition has been a significant program for the City to acquire properties in need of rehabilitation or redevelopment. The City’s portfolio consists of properties for future residential and commercial development. The Housing Rehabilitation program has been in operation since 1976 and has assisted with the improvement of more than 800 houses. The Down Payment Assistance program, although no longer in operation, helped more than 100 families purchase their first home, and the Homes Again Purchase program made it possible to relocate 14 residences that were in the path of other improvement projects, such as highway projects and university parking lots. These homes were then rehabilitated and sold to first time homebuyers, resulting in retention of housing stock and help in stabilizing the neighborhoods where these developments are located.

The City’s CDBG funds have been used to make infrastructure improvements in the GURA target neighborhoods (Redevelopment District). These improvements have included curb, gutter, sidewalk, handicapped ramps, and repairs to asphalt and concrete. To date, nearly 10,000 LF of new sidewalk, 50 new handicapped ramps, nearly 8,000 LF of new curb and gutter, and over 4,000 SY of asphalt or concrete patching and repair have been completed, improving pedestrian access throughout these neighborhoods.

The City of Greeley has 37 parks throughout the community. Twenty-three of these parks are located east of 23rd Avenue. The city has two youth sports parks, one of which is located in East Greeley. The City’s Recreation Center is located downtown on one of the bus routes, as is the Senior Activity Center and the Ice Haus. The Rodarte Community Center is in North Greeley. Three of the City swimming pools are located east of 23rd Avenue. The Poudre River Trail provides miles of paved trail for walking and biking. Other on-street bike lanes provide bicycling opportunities. These facilities are well-distributed throughout the community, with thought given to the distribution and offering of facilities and activities at each location, to provide a variety of recreational opportunities for the areas served. Map 6 in the Appendix shows City parks and other recreational and community facilities.

E. Public Transportation/Housing/Jobs Linkage

Greeley-Evans Transit (GET) provides public transportation in Greeley and Evans on six fixed routes. In 2012, GET had over 468,000 riders, with ridership continuing to increase. 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. Call-n-Ride service is available after regular hours and on Sundays. Travel training is offered to seniors and persons with disabilities and teaches them how to travel safely and independently on the bus system. Map 7 in the Appendix shows GET routes and the Weld County Employment Services location.

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. The University of Colorado Health and Columbine Health Systems operate a complimentary patient transport service for persons that are ambulatory between Greeley, Loveland and Fort Collins. This service, “Connecting Health”, operates on a regular schedule Monday – Friday, to connect the Greeley Medical Clinic, Greeley Emergency and Surgery Center, Medical Center of the Rockies, Harmony Campus and Poudre Valley Hospital.

More than 41,000 Greeley residents 16 years of age and older commuted to work by driving alone or carpooling, using public transportation, walking, and other means including biking. Over 1,300 persons worked at home and were included in the commuter numbers.

Table 24: Commuters – 2007 - 2011

Total commuters 16 and older	41,293	% of Total
Car, truck or van – alone	32,507	78.7%
Car, truck or van – carpooled	4,586	11.1%
Public transportation	413	1.0%
Walked	1,212	3.0%
Other means	1,266	3.0%
Worked at home	1,309	3.2%
Average travel time	20.3 mins	-----

Source: American Community Survey 2007 - 2011

A lack of their own transportation, having housing too far from a bus route, or not having bus service near their home, work or services was noted as a problem in looking for housing in 14% of the responses given on the transportation-related questions. More than 17,000 single-ride bus tokens are provided by the City to United Way of Weld County annually 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. Additionally, the City discounts the cost of a bus ride by half to persons who are elderly or disabled (\$0.75 rather than \$1.50).

F. Housing Authority and Assisted Housing

The Greeley and Weld County Housing Authorities operate with one staff and manage the Section 8 Housing Choice vouchers. 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.

The Housing Authority owns and operates public housing and manages the Section 8 Housing Choice vouchers for the City of Greeley and for Weld County. These vouchers are intended to be portable.

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 below. Pacific Islanders have the highest poverty rate at 63.3% and the lowest is Asian households.

Table 25: Poverty Rates by Race, Ethnicity, Disability, Household Type: 2007 - 2011

Population	Poverty Rates
African American/Black	39.3%
Asian	14.5%
Native American	49.8%
Pacific Islander	63.3%
Caucasian/White	22.6%
Hispanic/Latino Origin	33.3%
With a Disability	24.8%
Single Female Head	39.3%
Single Male Head	18.3%
Families with Children (under 18)	48.9%

Source: Greeley City Housing Authority Resident Statistics (Public Housing, Section 8), 2013; American Community Survey, 2007 – 2011; American Community Survey 2011

Current Greeley Housing Authority residents are predominantly Caucasian/White, accounting for 92.2% of all residents. A determination of whether members of protected populations experience disproportionate barriers in fair housing choice can be made by comparing city-wide 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.

In public housing, families with children, single-female parent households, and Hispanic/Latino households are receiving public housing assistance at higher rates than those same populations living in poverty throughout the community. With Section 8 voucher holders, families with children, families with a member who has a disability, single-parent households, and Hispanic/Latino households are receiving assistance at higher rates than these populations living in poverty throughout the community. The public housing units are primarily two and three-bedroom units, while the majority of voucher holders are living in two-bedroom units. Of all public housing residents and voucher holders, 43.0% are living in units that are three-bedrooms or larger.

Table 26: Greeley Housing Authority Residents – 2013*

	Public Housing		Voucher Holders	
Total Households	93		433	
Household Type**				
Families with children	88	94.6%	230	53.0%
Elderly	3	3.2%	134	31.0%
Families with disabilities	15	16.1%	182	42.0%
Single female parent	78	83.9%	326	75.3%
Single male parent	15	16.1%	107	24.7%
Race/Ethnicity				
Asian	1	0.1%	2	0.5%
Black	19	20.4%	18	4.0%
White	73	78.5%	412	95.0%
Other	0	0	1	0.2%
Hispanic/Latino	57	61.3%	217	50.1%
Units by Bedroom Size				
0 bedroom	0	0	3	0.7%
1 bedroom	0	0	99	22.9%
2 bedroom	32	34.4%	166	38.3%
3 bedroom	39	41.9%	122	28.2%
4 bedroom	21	22.6%	36	8.3%
5+ bedroom	1	0.1%	7	1.6%

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 (over 2,100 households - 767 for public housing and 1,353 for Section 8), the Housing Authority waiting lists have been closed for the remainder of 2013. 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 waiting lists, the largest groups are those that have incomes of 30.0% AMI or less. The waiting list includes 767 households waiting for 93 units of public housing and another 1,353 households waiting for one of the 433 Section 8 vouchers.

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

Table 27: Greeley Housing Authority Waiting List Applicants – 2013*

	Public Housing		Vouchers	
Total Households	767		1,353	
Income Level				
30% AMI or less	678	88.4%	1,180	87.2%
30.1 – 50% AMI	77	10.0%	153	11.3%
50.1 – 80% AMI	9	0.1%	12	0.9%
Household Type**				
Families with children	746	97.3%	939	69.4%
Elderly	6	0.8%	91	6.7%
Families with disabilities	34	0.5%	242	17.9%
Race/Ethnicity				
Asian	7	0.9%	4	0.3%
Black	99	12.9%	168	12.4%
Native American	0	0	9	0.9%
White	655	85.3%	1,158	85.6%
Other	4	0.5%	13	0.7%
Hispanic/Latino	407	53.0%	689	51.0%

Source: Greeley Housing Authority, 2013 * Totals may not match due to lack of information

** A household may fall within more than one type

The Housing Authority also manages the La Casa Rosa Apartments on C Street in North Greeley, which offers fourteen one-and two-bedroom apartments for seniors 55 and older. The Stage Coach Garden Apartments has thirty two-and three-bedroom apartments for working families. Housing Choice Vouchers may be used toward the rent at either location. Both apartment complexes were developed as Low Income Housing Tax Credit (LIHTC) developments and are managed by the Housing Authority.

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. 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 become 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 and one citizen’s committee that may address housing and/or protected populations in Greeley.

- **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. Members include eight appointed by the City Council, one from the University of Northern Colorado, one from Aims Community College and one from the Greeley-Evans School District 6.
- **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.
- **Citizens Committee for Community Development** provides public comments and recommendations to the Greeley Urban Renewal Authority annually on neighborhood and community needs that might be addressed through the City's Community Development Block Grant program.

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 residential units. The City has adopted the 2012 International Building Codes (with the exception of 2012 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.

The Fair Housing Act requires, for buildings with four or more units first occupied after March 13, 1991,

that there be an accessible entrance on an accessible route; public and common areas be accessible; doors and hallways be wide enough for wheelchairs; and that all ground floor units and all units in buildings with elevators have an accessible route into and throughout the unit; have accessible switches, outlets, thermostats and other environmental controls; have reinforced bathroom walls that allow for the installation of grab bars in the future; and have kitchens and bathrooms usable by someone in a wheelchair.

The Americans with Disabilities Act (ADA) requires equal access to places of public accommodation and commercial facilities for persons that have a disability, in the Title II and Title III Regulations, which were required as of 2011. 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; and
- 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 be in compliance with fair lending practices to ensure there is no discrimination occurring 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. Recent changes to the FHA private mortgage insurance requirements have lenders and would-be home buyers looking less favorably at FHA financing than in the past. These changes 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.

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 2011 is summarized in the tables that follow. A total of 10,715 loan applications were submitted for Greeley properties in 2011. Of these, 65.2% of were originated, while 17.0% were denied.

Table 28: Status of Home Loan Applications: 2011

Status	Number	Percentage
Loan Originated	6,989	65.2%
Application approved/not accepted by applicant	567	5.3%
Application denied by lender	1,817	17.0%
Application withdrawn by applicant	1,047	9.8%
File closed - incomplete	295	2.7%
TOTAL LOAN APPLICATIONS	10,715	100.0%

Source: Home Mortgage Disclosure Act Data, Table 1, Reporting Year 2011

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, 49.5% had their loan originated while 27.0% had their loans denied. In contrast, non-Hispanic/Latino residents had a 68.1% loan origination rate and a 16.0% denial rate.

Table 29: Status of Home Loan Applications by Race and Ethnicity: 2011

Race	Percent Originated	Percent Approved Not Accepted	Percent Denied
African American/Black	61.3	6.5	23.0
Asian	65.0	3.4	22.0
Caucasian/White	63.5	5.3	16.7
Native American	58.0	7.0	33.3
Pacific Islander	62.0	0	0
Hispanic/Latino	49.5	9.3	27.0
Non-Hispanic/Latino	68.1	5.0	16.0

Source: Home Mortgage Disclosure Act Data, Tables 4.1 – 4.4, Reporting Year 2011

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

The reasons for loan denials by race and ethnicity are summarized below. The most commonly reported reasons why loans were denied were debt-to-income ratios, lack of collateral, and credit history. For individuals of Hispanic/Latino origin, denials based on debt-to-income ratio and credit history were significantly higher than the denial rates for non-Hispanic/Latino homebuyers. Denials for lack of collateral were highest for African Americans and all non-Hispanic/Latino applicants. Pacific Islanders had higher denial rates when compared to the overall population for insufficient cash, incomplete credit applications, and other reasons.

Table 30: Home Loan Denial Rate Reasons by Race and Ethnicity - 2011

Race / Ethnicity	Debt-to-Income Ratio	Job History	Credit History	Lack of Collateral	Insufficient Cash	Info. not Verified	Incomplete Credit App	Mort. Ins. Denied	Other
African Amer/Black	3.2	0	3.2	3.1	0	0	3.2	0	0
Asian	4.7	0	2.7	8.0	0	2.0	2.7	0	2.0
Caucasian/White	3.5	0.2	3.7	3.7	0.5	0.8	1.7	0.1	2.6
Native American	7.0	0	21.0	5.3	0	0	0	0	3.5
Pacific Islander	14.3	0	0	9.5	0	0	0	0	0
Hispanic/Latino	6.7	0.4	8.3	5.5	0.7	0.8	1.4	0	0
Non-Hispanic/Latino	3.1	6.2	4.4	3.8	0.5	0.8	1.7	0	0
ALL LOAN APPS	20.6	1.5	22.1	22.2	3.1	5.2	9.9	0.1	15.3

Source: Home Mortgage Disclosure Act Data, Tables 8.1 – 8.4, Reporting Year 2011

Subprime lending, which was designed for borrowers that were considered to be higher credit risks, resulted in making the cost of credit higher for some households in recent years. A subprime rate is one that has an interest rate at least 1.5% higher than the average applicable prime rate for a first lien. Second liens that are higher cost have a rate at least 3.5% higher than the average prime rate. Loan pricing information has not been reported on all loans for home purchases in Greeley because some loan rates were not above the APR thresholds, some did not include the APR, and others were loan types that do not require disclosure of this information. Of those higher rate loans reported, 17.0% were for Hispanic/Latino buyers and 83.0% were non-Hispanic/Latino buyers. These rates were more prevalent for households of middle and upper incomes, which accounted for 83.0% of all higher rate loans. No higher rate loans were reported for any racial populations other than Caucasian/White home buyers in 2011.

Loan pricing for the period of 2008 – 2010 showed the majority of higher rate loan activity taking place in 2008, with 51.0% of higher rate loans given to Caucasian/Whites and 13.0% to Hispanic/Latino home

buyers. In 2008, the threshold for high interest rate loans was 3.0% above the average prime rate for a first lien loan and 5.0% for second liens. These thresholds dropped to the current levels in 2009 and although the number of loans with higher interest rates dropped in 2009 and 2010, there were still similar rates for Caucasian/White and Hispanic/Latino buyers. One Asian household purchased a higher interest rate loan in 2009.

Although the analysis of HMDA data does not include all factors that are taken into account by lenders in the decision of whether to originate a loan or not, it does provide some background into lending practices in Greeley. Based on this information, Hispanic/Latino applicants appear to have higher rates of denial for mortgages than the entire applicant population. The primary reasons for denial by the financial institution for all loan applicants are credit history, lack of collateral, and debt-to-income ratios.

B. Real Estate Practices

The Greeley Area REALTORS Association has more than 300 individual REALTOR members, as well as more than 60 affiliate members. The affiliates include appraisers, lenders, title companies, and other businesses related to the real estate industry. The REALTORS Code of Ethics includes Article 10, which generally incorporates the same provisions as the Fair Housing Act. In 2010, sexual orientation was added to the Code of Ethics, expanding the protected classes. Membership in the local real estate community is fairly 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 participate on City boards and commissions and on the boards of area non-profits.

A criminal case involving real estate sales to local Hispanic families who were targeted with predatory lending was successfully prosecuted by the Weld County District Attorney's office in 2009. This case alleged that predatory lending and mortgage fraud were targeting Hispanic families in several local subdivisions, eventually resulting in foreclosure for these homeowners. The defendants were found guilty of criminal charges from allegations of inflating home prices, failing to explain or disclose loan terms, and targeting home buyers with damaging loan products in 2009. A second case was prosecuted in 2012 and resulted in convictions related to defrauding lenders by overinflating the prices of homes in a West Greeley development, resulting in foreclosures in the development. Those convicted included individuals involved in selling and financing real estate sales. While these instances are isolated cases, they are indicative that practices that are discriminatory in the sale of housing have occurred in Greeley.

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 2007. The following impediments were identified then:

- Housing discrimination;
- Land development costs and fees;
- The NIMBY (**Not In My Back Yard**) syndrome;
- Foreclosure and credit history;
- Low income and wage levels;
- A lack of affordable housing units for low and very low-income households; large housing units for families; affordable accessible housing units for persons with disabilities; and adequate number of emergency and transitional housing units; and
- Language barriers.

Since 2007, the City has taken actions to address these impediments. There have also been changes in the community that have had a bearing on these impediments.

Housing Discrimination

As shown by the housing discrimination complaints filed and the questionnaire results, there is housing discrimination occurring in the community and possibly at higher instances than evidenced by the number of complaints filed. In the past, complaints have primarily been for rental properties. The recent data on complaints showed a majority of complaints being filed on properties for sale. The prevalent basis for complaints on rental properties was related to Hispanic/Latino origin, disability and familial status.

Land Development Costs and Fees

Greeley has some of the lower development costs and fees in Northern Colorado and while these fees add to the cost of housing, they do not appear to have served as a disincentive. As the housing market improves, this may once again become a more significant element that affects the cost of housing.

According to City Planning staff, the **NIMBY Syndrome** has not been an issue in residential or assisted living developments in the past five years. The primary issue this has occurred recently has been oil and gas proposals, which have generated a significant amount of interest and concern in the community. This may change again when new residential development is proposed, depending on the location and nature of the development proposal.

Foreclosure and credit history, and low income and wage levels are still apparent in the community, although foreclosure rates have dropped and wage levels have increased somewhat, as a result of the increase in oil and gas activity. Credit history remains as a primary reason for loan denials. The City of Greeley has worked to bring in employers that have higher-paying jobs to help increase income and wage levels. New jobs include those at cheese manufacturer Leprino Foods, the call center operated by TeleTech, and with several oil and gas industry companies, including Halliburton Energy Services and

Noble Energy. The City’s Economic Development office is continuing efforts to recruit employers, particularly those that pay higher wages, to locate in Greeley.

A lack of affordable housing units was identified as a barrier for low and very low-income households; large housing units for families; affordable accessible housing units for persons with disabilities; and for emergency and transitional housing units. HUD has since provided guidance and clarification on the differences between impediments to affordable housing and impediments to fair housing choice. An impediment or barrier to affordable housing is a condition or circumstance that impedes housing choice on an equal opportunity basis. In other words, an impediment to affordable housing has the potential to affect all residents of the community, regardless of whether they are a member of a protected class or not. An impediment to fair housing choice is a condition or circumstance that impedes housing choice/access to housing based on one or more of the following protected classes or populations, such as race, color, national origin, sex, religion, familial status, and disability. A lack of affordable housing may be an impediment, but in order for it to affect fair housing choice, it must be a particular impediment to someone because they are a member of a protected class.

In the provision of affordable housing over the past five years, the City has allocated HOME funds to assist Habitat for Humanity with development and building permit fee costs associated with the construction of new units in the Habitat North Subdivision; to assist Accessible Space, Inc. in the construction of housing for persons with disabilities and seniors; and to GURA’s Camfield Corner development, which is providing transitional housing through Greeley Transitional House (GTH) for families who are homeless and working toward self-sufficiency. There are 28 beds at the Transitional House’s 10th Street location, while eight apartment units are at the Camfield Corner site on North 11th Avenue with another three planned for construction in 2013.

Language barriers were identified as an impediment in 2007. With the increasing diversity in the community, there is also an increase in the number of persons whose primary language is not English. Spanish is still the second-most prevalent language, but with the increase in the refugee population, residents may need translation services for other languages. The growth in the African American/Black population is primarily due to the growing refugee population that has come to Greeley from East Africa. The Global Refugee Center (formerly known as East Africa Community of Colorado) started in 2008 to assist refugees with the challenges of adapting to a new community, while still retaining their own culture. The center offers programs in education, health, finance, culture and civil and human rights, with a “goal of building positive relationships between local communities and globally dispersed refugee populations”. With the growth of the local community, refugees from 43 different nations (well beyond the African continent) are served through classes, referrals, and advocacy.

Table 31: Language Spoken at Home: Population of 5+ years of age – 2007 - 2011

Language	Number	% of Population
English	65,140	76.3%
Spanish	18,270	21.4%
Indo-European	683	0.8%
Asian, Pac Islands	939	1.1%
Other	341	0.4%
TOTAL	85,373	100%
Speak English less than very well	8,623	10.1%
Source: 2007 – 2011 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.

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 the U. S. Department of Housing and Urban Development for the administration of the Community Development Block Grant Program and the HOME Investment Partnership Program. The staff participates in and collaborates with the Weld County Homeless Coalition, the North Front Range Continuum of Care, and the Housing and Emergency Services Network.

Since the last AI was completed, the Guadalupe Community Center and Shelter was constructed opened and has been full since opening. During FY 2012, there were 16,926 nights of shelter provided to 393 unduplicated clients. In addition to shelter, other services are provided on-site. A Woman’s Place provides emergency shelter for victims of domestic violence and their children. Shelter stays are becoming longer, due to a lack of other available housing, particularly for large families. The Salvation Army provides about 1,000 meals weekly to individuals and families that are homeless or who are “precariously housed”. 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. With construction of the Leprino Foods cheese factory, demand for dairy production and the need for dairy workers will continue to increase.

Two surveys of the Greeley area homeless population were done in the last year. Approximately 200 homeless people were interviewed during the fall of 2012 by the Weld County Homeless Coalition. This survey, known as the Vulnerability Index, showed 57 individuals to be identified as especially vulnerable. Those interviewed noted that a combination of issues kept them from finding housing. These issues included criminal history, substance abuse, inability to pay rent, mental health issues, job loss, and bad credit. The second survey was the point-in-time survey conducted on January 22, 2013. This survey was done of persons staying at the Guadalupe Shelter, Greeley Transitional House, and living on the streets. It showed 200 adults and 81 children either staying at the shelter, in transitional housing, or living on the street.

Table 32: Point-in-time Survey: 2013

Location	Number of Homeless
Guadalupe Shelter	94 (62 adults, 32 children)
Greeley Transitional House	123 (76 adults, 47 children)
On the street	64 (62 adults, 2 children)
TOTAL	281 people - 200 adults & 81 children

Source: Point-in-Time Survey, January 22, 2013

Staff from the City and Greeley Urban Renewal Authority participates in the Weld County Homeless Coalition. In 2011, the first annual Weld Project Connect event was organized by the coalition. This event offered services to 1,100 Weld County residents assisted by 600 volunteer “navigators” who helped guide them to the various services available. This event was sponsored by many local agencies, businesses, and entities and offered services that ranged from medical and dental screenings, to veterans services and legal advice. The 2012 event saw 900 residents seeking services and 650 volunteers. The 2013 event is scheduled for October 18 and will be held again at Island Grove in North Greeley.

B. Other Fair Housing Organizations

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. The majority of discrimination complaints fielded by CCRD are related to employment issues, while housing complaints account for only about 1.0% of the approximate 800 annual complaints received. 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 14 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 this program was originally on safety at area hotels and motels, the principles of the program were expanded to include rental properties. For 2013, there are 27 apartment complex members consisting of 2,414 housing units, as well as nine hotels/motels and four land-lease mobile home communities participating in Operation Safe Stay. (Total units involved in OSS are calculated at 4,445.)

SECTION EIGHT – Impediments & Fair Housing Action Plan

The impediments to fair housing choice and Fair Housing Action Plan in this section have been identified through the interviews with representatives of area agencies and organizations, analysis of data, and the results of the questionnaire distributed by participating agencies.

A. Impediments to Fair Housing Choice

- 1. Housing discrimination:** While the majority of housing discrimination complaints filed in the past six years was found to have no cause, two had issues that were addressed and resolved successfully. The results of the questionnaire for this project indicate that other Greeley residents believe they have been discriminated against, although they did not file complaints. At the very least, all of these individuals believe they were treated in a discriminatory way for being a member of a protected class. Predatory lending directed at members of a protected class is also discriminatory and is a barrier to fair housing choice.
- 2. Language and culture:** Language and culture are barriers to fair housing choice. With the location of refugees in Greeley from many nations, the need for translation services in different languages and an understanding of cultural differences will continue to increase.
- 3. Transportation:** Transportation is 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. Those areas are, however, typically in higher income neighborhoods where transportation is not such an issue.
- 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. The highest current need seems to be for large family units (three bedrooms or greater).
- 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.

Fair Housing Action Plan

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

Table 33: 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 REALTORS Assoc. REALTORS Lenders Property managers UNC Housing CCRD & HUD	Annually, on-going	<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	Annually, on-going	<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	Annually, on-going	<ul style="list-style-type: none"> Number of events held or number of informational pieces distributed
	1D. Update City publications that include information on fair housing (Rental Guide, Operation Safe Stay, etc.) to state protected classes	Neighborhood Resources GURA	2014	<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	2013	<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	2014	<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 Global Refugee Center	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
Increase 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	Annually	<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	Annually	<ul style="list-style-type: none"> Number of rehabs completed for persons that are disabled
	4C. Support the provision of services for families in transitional housing, by directing funding to organizations that provide these services	GURA City of Greeley	Annually	<ul style="list-style-type: none"> Number of families served
	4D. 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)
	4E. 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	5A. Work with area lenders to provide homeownership opportunities for qualified households of all races and ethnicity	GURA Lenders REALTORS	On-going	<ul style="list-style-type: none"> Annual number of loans originated and reduction in loan denials by race and ethnicity

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 _____, 2013.

Tom Norton, Mayor

Date

SECTION TEN - Appendix

A. Maps

1. Census Tracts
2. Racial and ethnic minority concentration
3. Location of Greeley Housing Authority units
4. Location of housing for persons with disabilities
5. Redevelopment District boundaries
6. City parks and other recreational and community facilities
7. Greeley-Evans Transit (GET) routes and Weld County Employment Services locations

B. Questionnaire in English and Spanish