



Executive Summary of the Analysis of Impediments to Fair Housing Choice

City of Lakewood, Colorado



FINAL REPORT

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Prepared for

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EXECUTIVE SUMMARY:

Analysis of Impediments to Fair Housing Choice— City of Lakewood, Colorado

In 2012, the City of Lakewood, in conjunction with Jefferson County and the City of Arvada, contracted with the Denver consulting firm BBC Research & Consulting (BBC) to complete an Analysis of Impediments to Fair Housing Choice or AI. The AI is a review of fair housing barriers in a city or county and is required by the U.S. Department of Housing and Urban Development (HUD) as a condition for receiving federal housing and community development block grant funding.

The joint AI consists of:

- An examination of demographic trends that influence housing choice,
- Identification of areas of racial and/or ethnic concentrations and analysis of the reasons for any concentrations,
- Analysis of affordable housing opportunities and how well subsidized housing programs serve protected classes,
- Consideration of mortgage lending disparities between borrowers of different races and ethnicities,
- A review of public policies—primarily land use and zoning regulations—that affect the provision of housing,
- Input from residents and stakeholders about their experiences finding housing and encountering housing barriers, and
- Identification of impediments to fair housing choice and development of a Fair Housing Action Plan (FHAP) to address the impediments.

This executive summary contains findings in the joint AI specific to the City of Lakewood.

The AI incorporates the most recent data available at the time the section was prepared. Primary data sources include:

- 2010 Census;
- Colorado State Demographer;
- 2011-American Community Survey; and the
- 2006-2010 American Community Survey.

The State of Fair Housing in Lakewood

The City of Lakewood has historically affirmatively furthered fair housing choice by providing a wide variety of housing choice and opportunity to all types of residents. For example through ongoing programs such as the Single-family Housing Rehabilitation program, Down-payment Assistance, Self-sufficiency and Section 8 Landlord trainings, the city has been actively reducing the barriers to fair housing choice.

In addition, each year Lakewood holds the Citizen's Planning Academy for Lakewood residents and business owners. Education is provided to participants, which helps to reduce the potential for NIMBYism.

Language barriers are addressed through ensuring bi-lingual staff is available during business hours. The city's website has the ability to translate the text to several languages. Links in English and Spanish to HUD and FHEO are provided on the city's CDBG and HOME webpage and Lakewood publishes all CDBG/HOME public notices in Spanish as well as English.

The city's recently revised zoning and land use regulations are very progressive and encourage a creation of a wide variety of housing types and uses, including housing for persons with disabilities. The city's group home regulations, in particular, should serve as model regulations for other communities.

Fair housing impediments are minimal in Lakewood and are largely related to older and aging infrastructure which does not accommodate persons with physical disabilities, lack of accessible housing (a barrier countywide) and resistance by some residents toward residential development (of any type).

Primary Findings from the AI

This section highlights the primary findings from the joint AI and includes the following topics:

- Racial and ethnic diversity and concentrations;
- Distribution of and access to affordable housing;
- Land use and zoning regulations and their effect on housing choice;
- Policies and procedures of Metro West Housing Solutions (the city's housing authority);
- Identification of potential fair housing barriers by stakeholders and residents;
- Private sector lending practices and disparities in mortgage loan denials; and
- Fair housing impediments in Lakewood and a recommended Fair Housing Action Plan (FHAP).

Demographic and housing profile. The 2011 Census' American Community Survey (ACS) reported Jefferson County's population at 539,884. Currently, nearly half of the county population lives in Lakewood (population 144,414) and Arvada. Over the decade, the county population overall grew by 2.4 percent. Lakewood's population changed little during the decade with a growth of just .2 percent.

Racial and ethnic diversity and concentrations. Lakewood residents report their race as predominately white (90.4%, about the same as the county's 91.5%). The largest racial minority groups in the city are Asians (2.5%) and African Americans (1.6%). About one-fifth of the city's population reports their ethnicity as Hispanic, compared to 14 percent for the county overall. Over half of the county's Hispanic population lives in Arvada and Lakewood (56%), which is moderately higher than the overall population share of these cities (46%).

Figure ES-1 shows ethnic concentration data by Census block group in Jefferson County and Lakewood. According to HUD, concentrated block groups are of those where the block group exceeds the county proportion by more than 20 percentage points (35%).

As shown by the map, the areas of concentration are located near the eastern border of the county, mostly in Lakewood. In fact, of the 26 concentrated block groups:

- 21 are in Lakewood;
- Two are in Arvada;
- Two are in Edgewater; and
- One is in Wheat Ridge.

Figure ES-2 shows the proportion of African American residents in Jefferson County and Lakewood block groups. Because there are no concentrations of African Americans, the map instead shows block groups in which African Americans represent a higher percentage than the county proportion (1%) of residents.

Figure ES-3 shows the proportion of Asian residents. There are no concentrations of Asians in the county or city; as such, the map shows block groups in which Asians represent a higher percentage than the county proportion (2.4%) of residents.

Figure ES-1.
Percent Hispanic Population
and Concentrated Areas,
Lakewood and
Jefferson County, 2010

Source:
2010 Census.

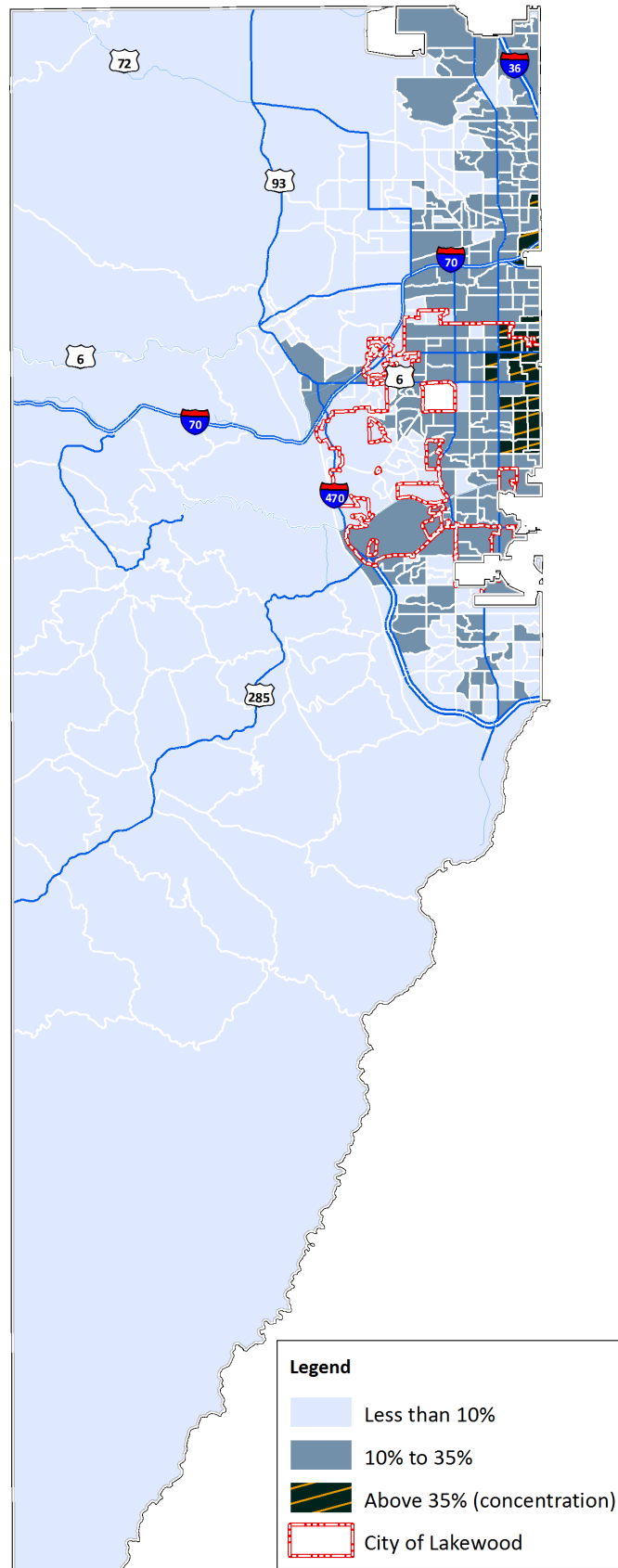


Figure ES-2.
Percent African American
Population, Lakewood and
Jefferson County, 2010

Source:
2010 Census.

Note:
There are no block groups with a
concentration (greater than 21%) of the
population identifying as African
American.

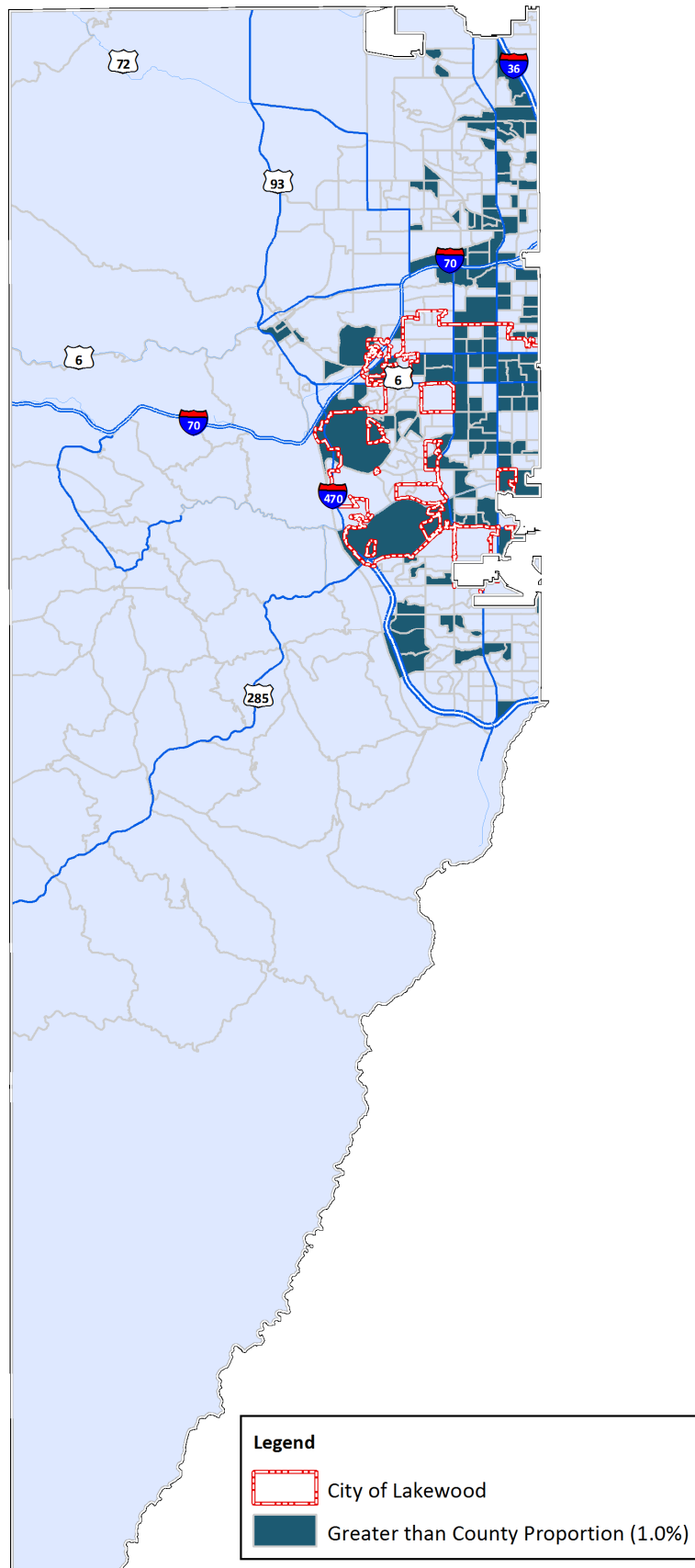
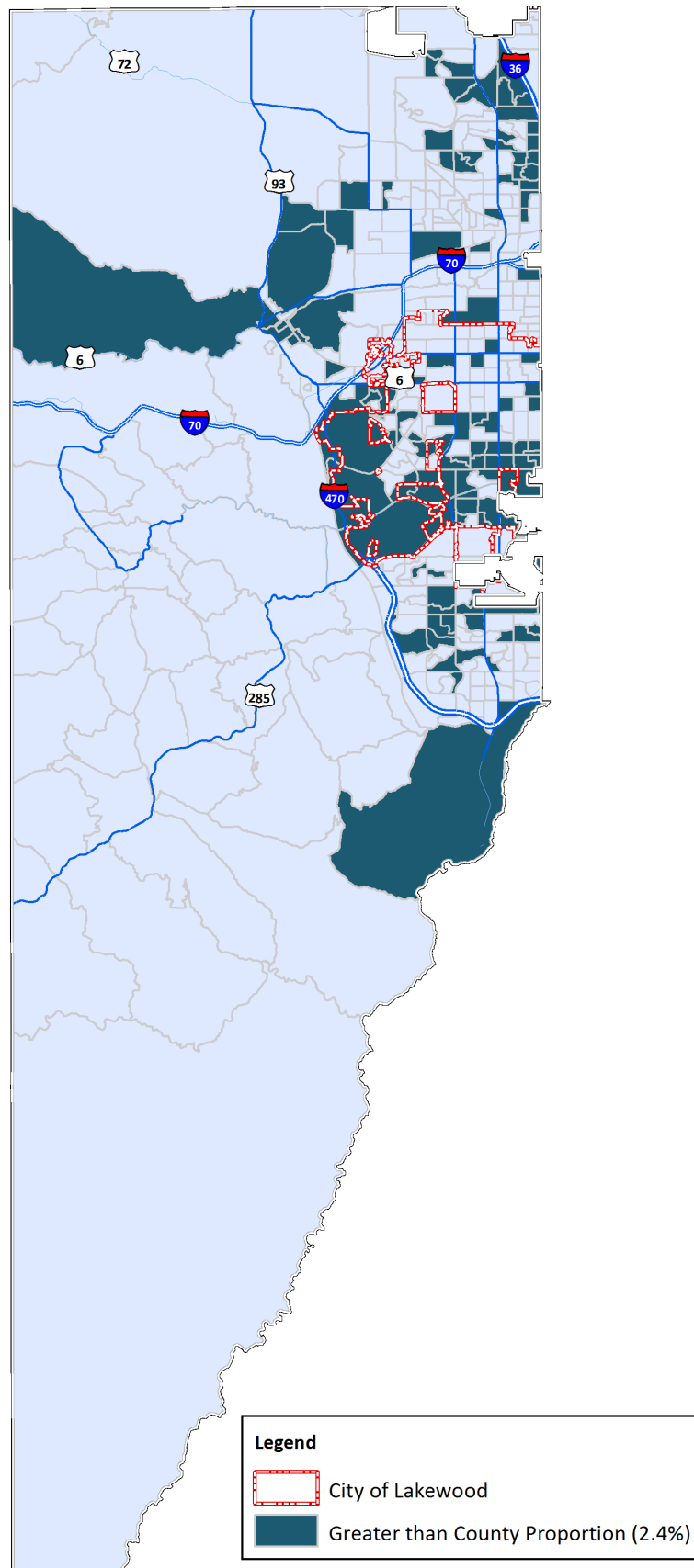


Figure ES-3.
Percent Asian Population,
Lakewood and Jefferson
County, 2010

Source:
2010 Census.

Note:
There are no block groups with a
concentration (greater than 22.4%) of the
population identifying as Asian.



Disability. About 9 percent of Jefferson County citizens have a disability.¹ The largest age groups with a disability are the 75 years old and over group (46%) and 65 to 74 years old group (21%).

Poverty and concentrations. In 2006-2010, the proportion of Jefferson County residents living below poverty level was 8 percent. Lakewood's poverty rate, by comparison, was 11.7 percent—3.7 percentage points greater than the county's. Lakewood experienced a large increase in poverty during the past decade, with poverty growing by 4.6 percentage points. This was the third largest increase in the county (Edgewater and Golden experienced increases of 20.0 and 5.2 percentage points).

No Census tracts in the city or county have a poverty concentration (greater than 28% of families living below the poverty level). About half of the Census tracts with the highest poverty rates are also areas of Hispanic concentration. This suggests that poverty—and the lack of housing to serve persons living in poverty—disproportionately affects persons of Hispanic descent.

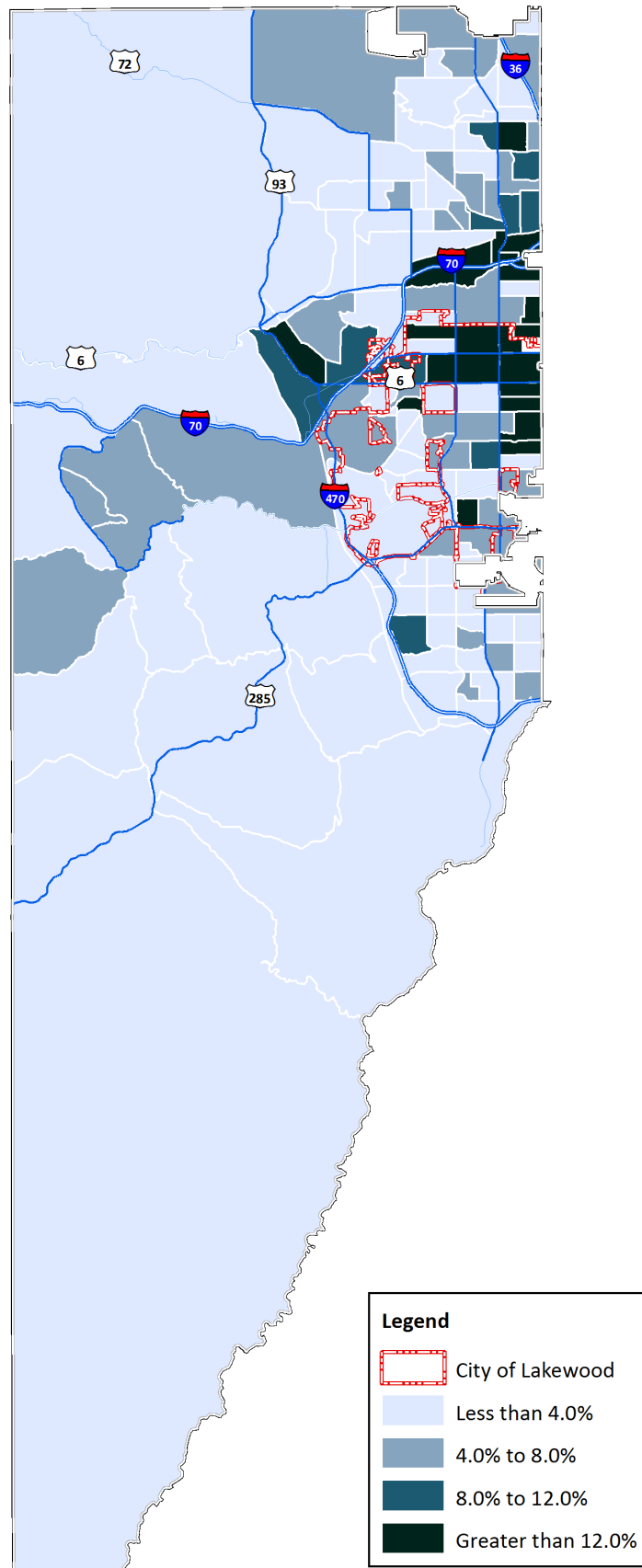
Figure ES-4 shows a proportion of families living below the poverty level by Census tract.

¹ At the time this report was prepared, updated disability data were only available at the county level.

**Figure ES-4.
Percent of Families Living
Below the Poverty Level,
Lakewood and Jefferson
County, 2010**

Source:
2010 Census.

Note:
No Census tracts had a concentration
(greater than 28%) of families living
below the poverty level.



Housing affordability and distribution. There is a wide array of housing types and affordability levels in Jefferson County overall; however, affordability varies substantially across communities. Lakewood offers many opportunities for affordable homeownership housing, as demonstrated by the following two maps.

**Figure ES-5.
Location of Homes Priced
Less Than \$200,000,
Lakewood and Jefferson
County, 2011**

Source:
BBC Research & Consulting and regional
MLS data.

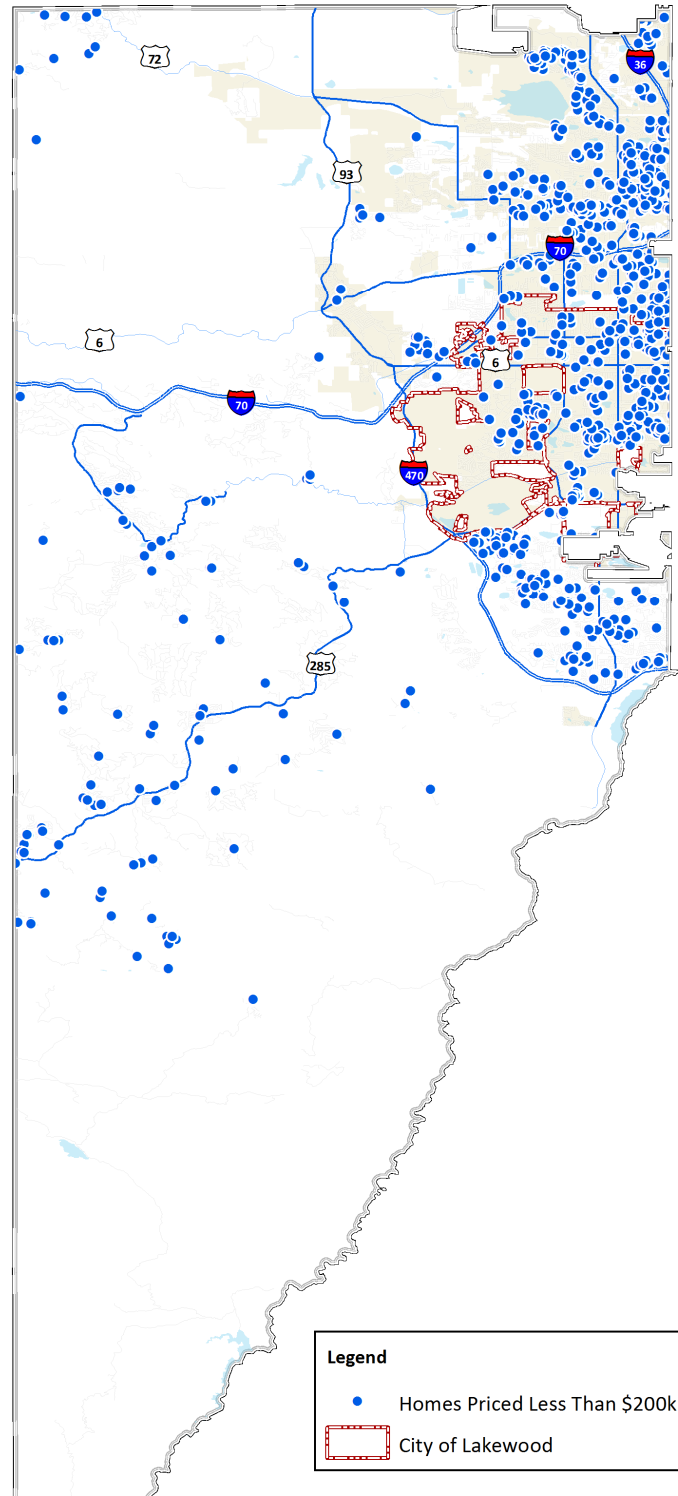
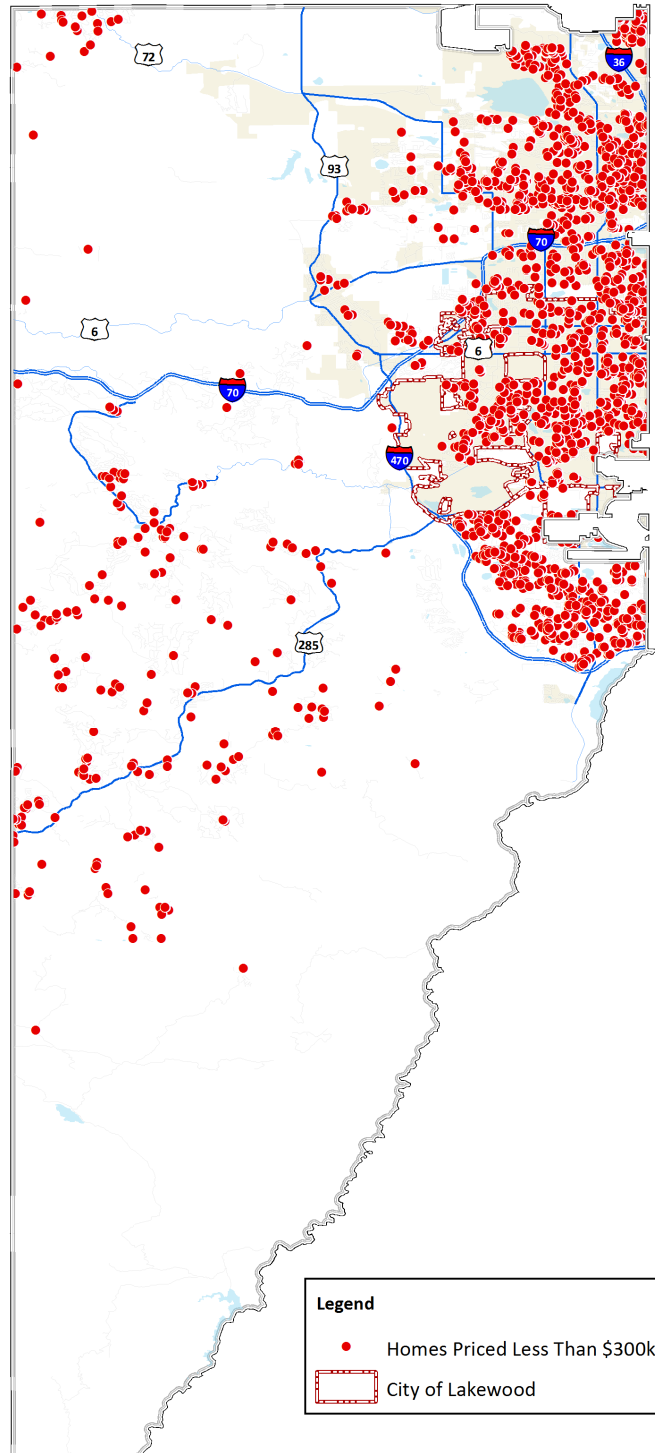


Figure ES-6.
Location of Homes Priced
Less Than \$300,000,
Lakewood and Jefferson
County, 2011

Source:

BBC Research & Consulting and regional
MLS data.



Rental costs in Lakewood—as in all of metro Denver—have increased significantly during the past few years. During the past decade, rents have increased by 19 percent in the county. In 2011, the median gross rent in Jefferson County was \$907. To afford the median rent, a household would need to earn \$36,000 per year. Nearly one-fourth of the county’s households earned less than this and would have trouble affording rent and not be cost burdened.

During the past decade, affordable rental units have declined, especially for extremely low income households. In 2000, 25 percent of rentals were affordable to households earning \$25,000 and less (these units rent for less than \$600 per month). By 2011, the proportion of affordable units had dropped to 10 percent. This compares with 17 percent of the county’s households—and 34 percent of the county’s renters—who earn less than \$25,000 per month.

The median gross rent in Lakewood rose 15 percent between 2000 and 2010, which was lower than the county’s increase (19%)—but still difficult for renters to manage given stagnant growth in renter income. As of second quarter 2012, according to the Metro Denver Vacancy Survey, the average rent in Lakewood was \$860/month and the vacancy rate was a very low 3.7 percent.

Yet, as shown below, Lakewood continues to provide a significant share of the county’s affordable rentals (36%), especially relative to its share of count population, as shown in the table below.

Figure ES-7.
Number and Proportion of Affordable Units, Jefferson County and Municipalities

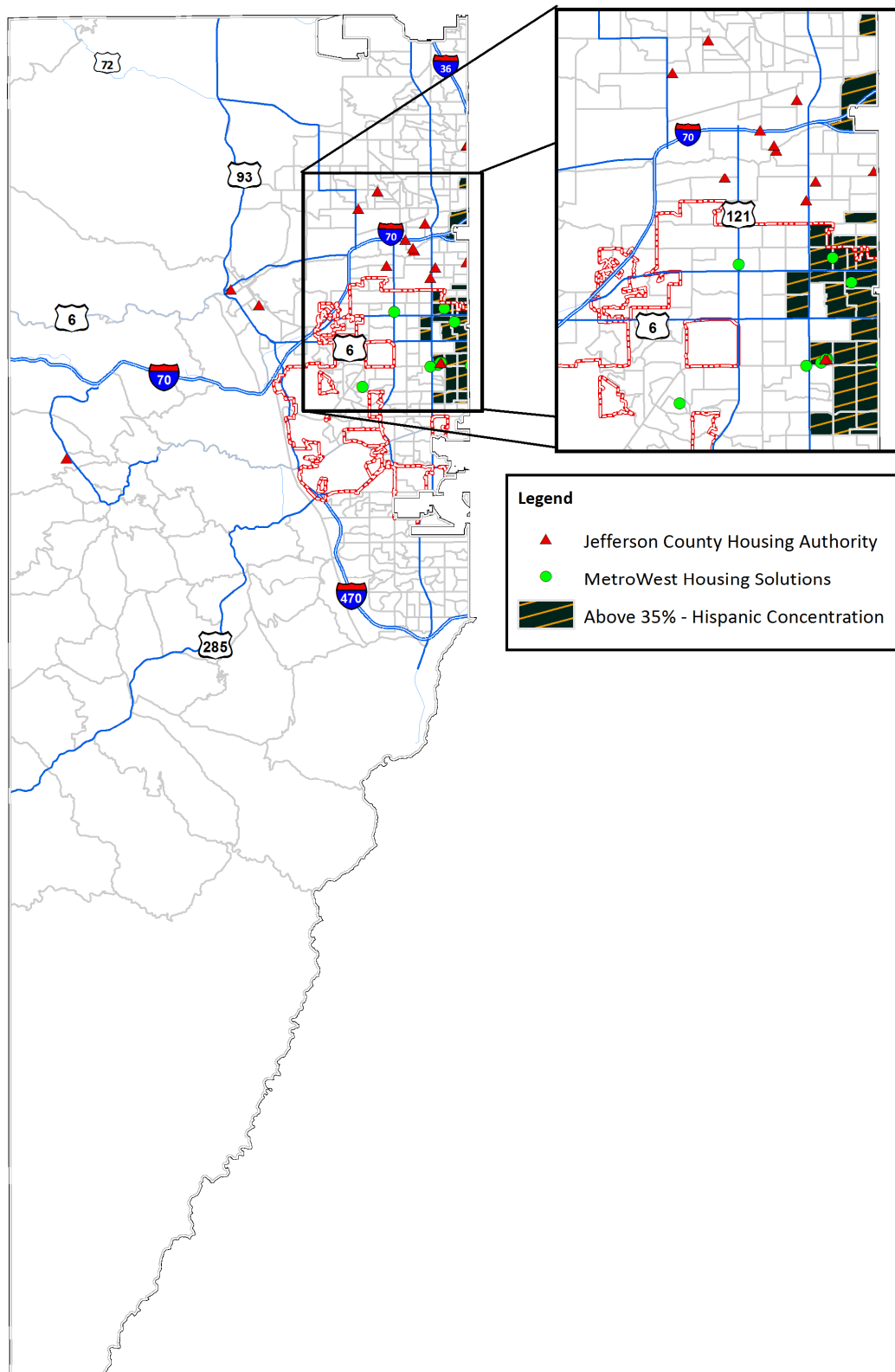
	Jefferson County	Arvada	Lakewood	Edgewater	Golden	Lakeside	Mountain View	Wheat Ridge
Less than \$200	377	177	129	12	19	—	—	101
\$200 to \$400	2,404	994	909	88	35	1	4	146
\$400 to \$600	3,846	755	1,345	60	438	—	8	774
Total Affordable Rentals	6,627	1,926	2,383	160	492	1	12	1,021
Percent of County:								
<i>Affordable Rentals</i>		29%	36%	2%	7%	0%	0%	15%
<i>Population</i>		20%	27%	1%	3%	0%	0%	6%

Source: BBC Research & Consulting.

Assisted and special needs housing. Figure ES-8 overlays the location of the MWHs and Jefferson County Housing Authority properties with areas of Hispanic concentration in the county, to examine if the county’s most affordable rental—those owned and operated by housing authorities—are predominantly located in concentrated areas. As the map demonstrates, the housing authority properties are largely located in the eastern portion of the county but are not exclusive to ethnically concentrated areas.

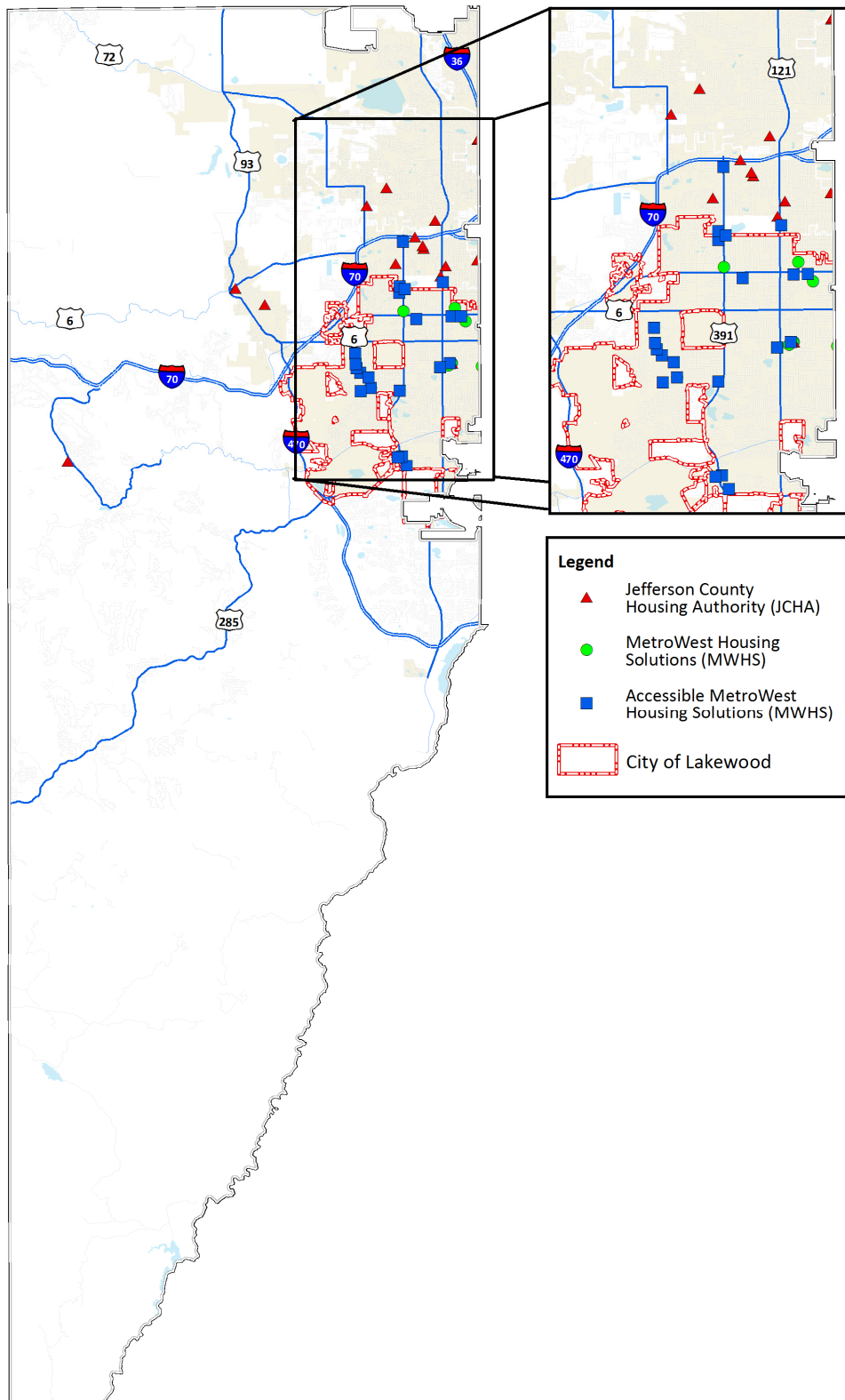
Figure ES-9 shows the location of accessible housing authority properties, which are mostly located near major roads and appears to be well distributed countywide, except for the northern/northwest portion of the county.

Figure ES-8.
Housing Authority Developments and Areas of Hispanic Concentration, Jefferson County, 2012



Source: Housing Authority websites and BBC Research & Consulting.

Figure ES-9.
Location of Accessible Housing Authority Properties, Jefferson County, 2012



Source: MetroWest Housing Solutions and BBC Research & Consulting.

Land use and zoning regulations review. The review of land use and zoning regulations for the City of Lakewood AI completed using a checklist developed by HUD. Special attention was paid to regulations governing group homes for persons with disabilities, an area where the potential to create barriers is usually the greatest.

Lakewood's zoning and land use regulations are very progressive from a fair housing perspective. This is largely due to the city's broad definition of Group Homes. Like Jefferson County, the city recently updated its code to allow more flexibility in land uses and accommodate a greater variety of housing types. The city's website is also very transparent and contains tables and maps that demonstrate the progress and location of zoning cases. No fair housing concerns were found in Lakewood's zoning and land use regulations.

- 1. Does the code definition of "family" have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement?**
No. Lakewood uses a definition of household that includes a variety of possible household compositions. Individuals with disabilities who are unrelated and living in congregate or group living arrangements could be considered as a household, although occupancy is limited to five unrelated individuals. Such individuals could reside together under the city's group homes and group living facilities regulations.
- 2. Does the Code definition of "family" have the effect of discriminating against unrelated individuals with disabilities who reside together in a congregate or group living arrangement?**
No, see above.
- 3. Is the Code definition of "disability" the same as the Fair Housing Act?** Lakewood's code does not define "disability."
- 4. Does the zoning ordinance restrict housing opportunities for individuals with disabilities and mischaracterize such housing as a "boarding or rooming house" or "hotel"?** No.
- 5. Does the zoning ordinance deny housing opportunities for disability individuals with on-site housing supporting services?** No.
- 6. Does the jurisdiction policy allow any number of unrelated persons to reside together, but restrict such occupancy, if the residents are disabled?** No.
- 7. Does the jurisdiction policy not allow disabled persons to make reasonable modifications or provide reasonable accommodation for disabled people who live in municipal-supplied or managed residential housing?** No.
- 8. Does the jurisdiction require a public hearing to obtain public input for specific exceptions to zoning and land-use rules for disabled applicants and is the hearing only for disabled applicants rather than for all applicants?** No.
- 9. Does the zoning ordinance address mixed uses?** Yes, the code includes guidelines for mixed-use districts.

- 10. How are the residential land uses discussed?** Lakewood code had eight residential districts including R-1-43 One Acre Residential, R--18: Rural Residential, R-1-12: Large Lot Residential, R-1-9: Medium Lot Residential; R-1-6: Small Lot Residential, R-2 Two-Family and Small Lot Residential, R-MF: Multifamily Residential; R-MH: Mobile Home Residential. Each district includes guidelines for permitted uses, lot size standards, setbacks and performance standards.
- What standards apply?** Each district includes guidelines for permitted uses, development standards, lot size standards, setbacks and performance standards.
- 11. Does the zoning ordinance describe any areas in this jurisdiction as exclusive?** No.
- 12. Are there any restrictions for Senior Housing in the zoning ordinance? If yes, do the restrictions comply with Federal law on housing for older persons (i.e., solely occupied by persons 62 years of age or older or at least one person 55 years of age and has significant facilities or services to meet the physical or social needs of older people)?** No.
- 13. Does the zoning ordinance contain any special provisions for making housing accessible to persons with disabilities?** Lakewood has adopted the 2009 International Building Code which includes provision for persons with disabilities and access to housing.
- 14. Does the zoning ordinance establish occupancy standards or maximum occupancy limits?** No.
- 15. Does the zoning ordinance include a discussion of fair housing?** No.
- 16. Describe the minimum standards and amenities required by the ordinance for a multiple family project with respect to handicap parking.** Handicapped parking is not directly discussed in the multifamily zoning district regulations. Instead, the code refers to the minimum number of ADA Accessible Spaces required under the ADA.
- 17. Does the Zoning Code distinguish senior citizen housing from other single family residential and multifamily residential uses by the application of a conditional use permit?** No.
- 18. Does the Zoning Code distinguish handicapped housing from other single family residential and multifamily residential uses by the application of a conditional use permit?** No.
- 19. How is "special group residential housing" defined in the jurisdiction Zoning Code?** Lakewood has two definitions of homes which may house special populations: 1) Group Home and 2) Group Residential Facility. The primary difference between the two types of facilities is the number of persons allowed.
- A **Group Home** is a facility that provides for the care, treatment and/or supervision, on a temporary or permanent basis, for 12 or fewer individuals. A Group Home may include private dining facilities, health care and similar services.
 - A **Group Residential Facility** is a facility that provides for the care, treatment and/or supervision, on a temporary or permanent basis, for more than 12 individuals.

Group homes serving one to eight individuals are permitted by right in all residential zone districts. Group homes serving nine to 12 individuals are permitted in all multifamily residential and mixed use districts; their use is limited in single family residential districts. Group residential facilities are permitted in residential multifamily and mixed use districts.

- 20. Does the jurisdiction's planning and building codes presently make specific reference to the accessibility requirements contained in the 1988 amendment to the Fair Housing Act?** There is no specific reference to the accessibility requirements in the FHA.

West Metro Housing Solutions policies and procedures. This section discusses the policies and procedures of West Metro Housing Solutions (MWHS), which serves as the public housing authority in Lakewood. It should be noted that the Jefferson County Housing Authority also provides affordable rental housing in Lakewood, in addition to other parts of Jefferson County. The policies and procedures of the Jefferson County Housing Authority are discussed in the county AI.

The mission of MWHS is to be a leader in providing quality housing options and transformative opportunities for people and communities. MWHS does not currently own and operate public housing; instead, the organization administers the Section 8 program in Lakewood in addition to operating as a nonprofit housing and service provider.

MWHS currently owns and operates six apartment communities and three senior living communities, with two more apartment communities planned. Annually, MWHS provides more than 1,500 services to clients ranging from bus passes to scholarships and computer literacy classes. MWHS strives to pair housing with supportive services: in 2012, a new state-of-the-art community resource center was opened in an apartment complex that includes a computer lab, kitchen, open gathering room and private office for meetings and service provision. In 2009, Creekside, a senior development of MWHS, was awarded Excellence in Project Design by the National Association of Housing & Redevelopment Officials (NAHRO).

As of December 2012, MWHS administered approximately 1,400 Section 8 vouchers.

The MWHS wait list for Section 8 vouchers was almost 2,500, about 1,000 more households than in 2011. Of those households on the wait list, almost 25 percent are persons with disabilities and 10 percent are seniors. Forty-six percent of households on the wait list are racial minorities and 42 percent are Hispanic. Therefore, persons with disabilities and racial and ethnic minorities are disproportionately represented on the wait list.

MWHS staff report that the tightening of the rental market has reduced the supply of apartments available to voucher holders and forced clients to locate in lower income, more central communities with the city. The past year was the first that MWHS was not granted bonus points for deconcentration. Staff report that it is much harder for clients to find affordable rentals in high opportunity areas than it has been in the past.

The briefing packet that new voucher holders receive at their orientation meeting was reviewed as part of this AI. The packet was easy to understand, contains information on fair housing rights and requesting a reasonable accommodation, describes portability options and lists accessible apartment complexes.

MWHS's Administrative Plan was also reviewed as part of the AI. No major fair housing concerns were identified in the wait list procedures or fair housing information.

Two modifications are recommended for the Administrative Plan:

- 1) In **Section 5.2 Preferences**, it appears that persons who work or live in Lakewood have first preference followed by persons with disabilities. Persons with disabilities should have preferences equal to that of persons who are employed in the city. It is our understanding that this is the policy of MWHS; however, the Administrative Plan could be interpreted to suggest otherwise. The Arvada Housing Authority Administrative Plan, for example, contains model clarifying language: “Note: Any single person, Head of Household or spouse who is 62 years old or older (elderly) or disabled automatically qualifies for the employment/residency preference.”

- 2) **Section 1.0 Equal Opportunity** reads:

“No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, or disability be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under the Metro West Housing Solutions housing programs.”

This section should be updated to reflect the March 5, 2012 final rule that HUD-assisted housing should be made available without regard to actual or perceived sexual orientation, gender identity or marital status.

It may also be worth noting that MWHS staff can inquire about an applicant’s or occupant’s sexual orientation or gender identity in HUD-assisted properties for the purpose of determining eligibility. Finally, MWHS may want to update its definition of family to include families regardless of actual or perceived sexual orientation, gender identity or marital status of members.

Not-in-My-Backyard Syndrome (NIMBYism) review. NIMBYism was reviewed by examining contested zoning decisions and testing residents’ resistance to and preferences about residential development in the AI survey. One case of NIMBYism, although not residential, occurred in Lakewood and is summarized below.

The Rocky Mountain Deaf School (school) is a charter school located within the Jefferson County School District (school district). The school received a \$13 million grant from the Colorado Department of Education to construct a school specifically designed to meet the needs of deaf and hard of hearing children.

The school worked with the school district to identify parcels that would be appropriate for the new building; vacant land located on 2990 Wright Street was selected.

Complications with the chain of title of the land and intended use of the property resulted in the school seeking rezoning from the City of Lakewood. The rezoning required a notification of neighborhoods surrounding the properties and hearings to discuss the proposed school.

Administrators of the school describe the hearings as very charged and in some cases, hostile. For example, one resident came to the meeting with a homemade cardboard sign that said “Go Away” which was held up in front of school staff.

Many neighbors objected to the development of the school because they understood the vacant land was to remain as open space and were reportedly resistant to any types of zoning. Some neighbors argued that a deaf school would lead to reduced property values and/or increase service delivery costs.

The City Planning Commission approved the school development unanimously. Because of neighborhood resistance, a supermajority approval was required by City Council, which was obtained.

After city approval, the neighbors sought a referendum to overturn the Council decision. The information presented to obtain signatures on the petition suggested that the land was always intended as open space, which remains unclear (and will be resolved by the courts).

The City of Lakewood considered, but due to fiscal concerns, decided against, continuing the case which would have gone to a citywide vote.

The school determined that it did not have the resources to continue to pursue the case and is looking at other parcels for development, likely in a commercial area where neighborhood resistance is low or nonexistent.

Public and stakeholder input. The public input effort for the joint AI included the following elements:

- A paper and online resident survey offered in Spanish and English—207 residents responded to the survey. The online survey was hosted by SurveyMonkey.com, a certified Section 508 compliant website.
- One community meeting to discuss fair housing issues held October 30, 2012—5 residents attended the meeting. The meeting was held at an accessible venue near public transit.
- An online survey of stakeholders about potential barriers to fair housing choice—57 stakeholders completed surveys.
- Interviews with subject matter experts, including housing developers, housing authorities, planners, and social service providers.

Reasonable accommodations. The city mailed postcards and flyers announcing the meetings to residents in low income and minority concentrated areas. The meeting notices included language offering to make reasonable accommodations for residents as requested. Many of the meeting attendees were persons with disabilities. One attendee brought a service animal, which was accommodated during the meeting.

To encourage participation by low income, minority, special needs and non-English speaking residents, packets of surveys in both English and Spanish were hand delivered to 11 nonprofit social service organizations in July. In addition, information about the surveys and the community meeting was sent by email and in hard copy to 11 nonprofit social service and housing organizations in the county. Figure ES-10 lists the survey distribution sites.

The Denver Post ran an article about the availability of the survey and the AI study in its community insert for Jefferson County (YourHub.com).

Because the survey was voluntary and distribution of paper surveys was targeted to lower income and special needs residents, the results are not necessarily representative of Jefferson County residents overall. Yes the residents surveyed live in a broad spectrum of cities within Jefferson County, including many low and moderate and ethnically concentrated areas in Lakewood, as the map in Figure ES-11 shows.

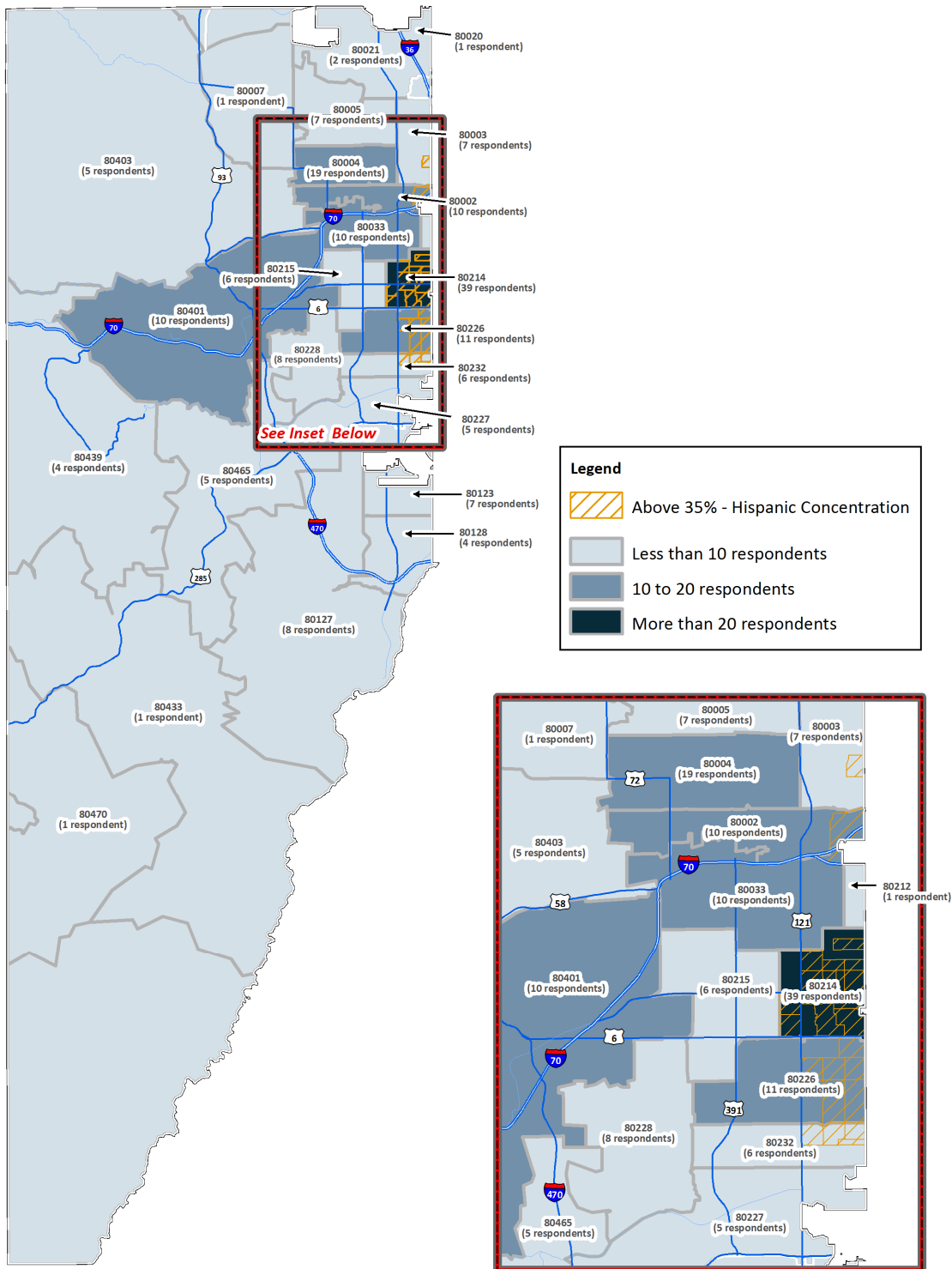
It is also important to note that the race and ethnicity of survey respondents matched the race and ethnicity of Jefferson County residents overall (92% white and 14% Hispanic).

Figure ES-10.
Resident Survey Distribution Sites

Organization
Arvada Community Food Bank
Brothers Redevelopment
Developmental Disabilities Resource Center
Family Tree, Inc
Jefferson Center for Mental Health
Jefferson County Housing Authority
Jefferson County Human Services
Metro West Housing Solutions
Seniors' Resource Center
The Action Center
The ARC in Jefferson County

Source: BBC Research & Consulting.

Figure ES-11.
Where Survey Respondents Live



Note: n=183.

Source: BBC Research & Consulting 2012 Jefferson County Resident Survey.

The primary findings from the stakeholder and public input include:

- Jefferson County residents are generally happy with their current housing situation. Residents view the greatest issues, or needs, in their communities as addressing crime, school quality, and neighborhood deterioration; all of which are factors in declining property values.
- The majority of residents did not consider many housing barriers to be very serious problems. On average, residents consider the most serious barriers to be finding affordable housing that has low crime, good quality schools, and neighborhood pride. Residents that are unsatisfied with their housing situation frequently cite declines in property values that prevent moving to another location.
- Residents report a moderate incidence of discrimination in Jefferson County overall (9%), but rates are much higher for minorities and persons with disabilities (24%). In addition, about one-quarter of residents believe that not all members of the community are treated equally. A strong theme emerged from the survey results as to why; class (poor versus affluent) and a person's race or ethnicity.
- Stakeholders consider a lack of affordable housing to be a serious barrier to fair housing choice in Jefferson County.

Perspectives from community meetings. Participants in the community meetings, many of whom have physical disabilities, emphasized the need for sidewalk improvements. In an exercise to identify the most serious barriers to fair housing choice, participants selected the issues they considered to be most serious. Two of the top three most serious barriers focused on accessibility issues:

- Housing for persons with disabilities is lacking; and
- Public and private areas are not accessible (lack sidewalks).

Much of the community meeting discussion focused on the need for sidewalks and sidewalk improvements, particularly along major thoroughfares such as Colfax, Wadsworth and Kipling. Other issues include:

- Difficulty navigating sidewalks in a wheelchair after snow because curb gets get iced over by snow plows, and bus stops become inaccessible because snow is piled on the curb;
- Sidewalks in older suburbs are very narrow and are too narrow for wheelchairs;
- The current dog park is not accessible to people with physical disabilities; and
- A lack of affordable and accessible rental units is a barrier.

Private sector lending practices. During 2010, there were 7,122 mortgage loan applications completed by residents of the City of Lakewood, representing 21 percent of all Jefferson County loan applications. Seventy-three percent of all loans originated in the City were conventional loans; 24 percent were FHA-insured; and the balance was VA or other guaranteed loans, as shown in Figure ES-12.

Figure ES-12.
Mortgage Loan Applications,
City of Lakewood, 2010

Note: VA-guaranteed loans are available to veterans through the Veterans Administration. FSA/RHS loans are available to residents in rural areas through USDA programs.

Source:

Home Mortgage Disclosure Act (HMDA), 2010.

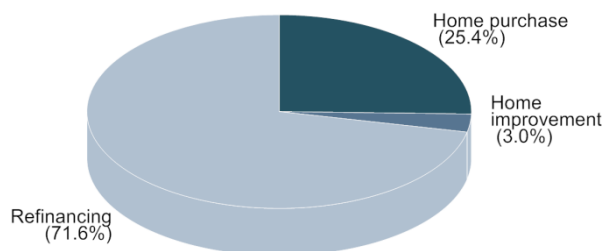
Type	City of Lakewood
Conventional	73%
FHA-insured	24%
VA-guaranteed	3%
FSA/RHS	0%
Number of applications	7,122

Figure ES-13 shows the purpose of the loan applications. The majority were refinances at 72 percent. Twenty-five percent was for home purchases; and just 3 percent was for home improvements. Loan purpose is very similar to that of Jefferson County as a whole.

Figure ES-13.
Purpose of Loan Applications,
City of Lakewood, 2010

Source:

Home Mortgage Disclosure Act (HMDA), 2010.

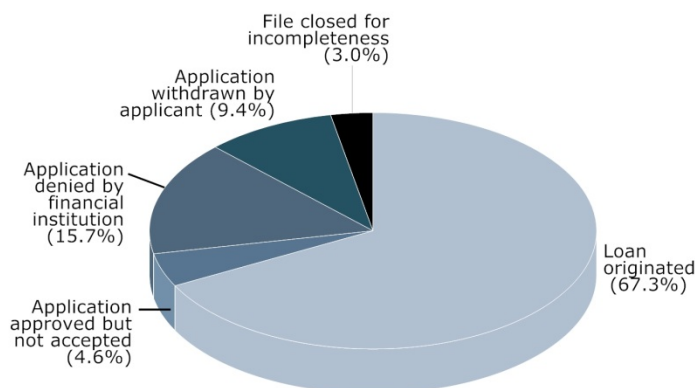


Of all of the loan applications in the City of Lakewood, 67 percent were approved and 16 percent were denied. Nine percent of the applications were withdrawn by the applicants and in another 5 percent of cases the applicants did not accept the loans. The loan file was closed as incomplete in about 3 percent of the cases. There was not a significant difference in loan application originations or denials than for Jefferson County as a whole.

Figure ES-14.
Action Taken on Mortgage Loan
Applications, City of Lakewood, 2010

Source:

Home Mortgage Disclosure Act (HMDA), 2010.



Like Jefferson County, there was little difference in the rate of approval by loan type: Conventional loans were approved 67 percent of the time, compared with 68 percent for FHA loans. Loan approvals varied, however by loan purpose with home purchases approved most often (75%), compared to just slightly over half for home improvements and 65 percent for refinances.

Figure ES-15 shows the disposition of loan applications by race and ethnicity for loans applied for by Lakewood residents. Hispanic borrower denial rates are 5 percentage points higher than for non-Hispanic borrowers. Denial rates for African Americans are about the same as for whites. Loan denials are high for American Indian/Alaskan Native and Pacific Islander applicants, although the number of applications from these groups is relatively small.

Figure ES-15.
Result of Mortgage Loan Applications by Race/Ethnicity, City of Lakewood, 2010

City of Lakewood	Percent of Total Loan Applications	Loan Originated	Action Taken			
			Application Approved, but Not Accepted	Denied	Application Withdrawn by Applicant	Closed for Incompleteness
Race						
American Indian or Alaska Native	1%	56%	2%	33%	6%	4%
Asian	3%	65%	3%	19%	7%	6%
Black or African American	0%	68%	3%	13%	6%	10%
Pac Islander	0%	53%	12%	24%	12%	0%
White	83%	70%	5%	14%	9%	3%
Info not provided by applicant	13%	53%	4%	24%	14%	5%
Not Applicable	0%	100%	0%	0%	0%	0%
Ethnicity						
Hispanic or Latino	8%	60%	6%	19%	10%	4%
Not Hispanic or Latino	80%	70%	4%	14%	9%	3%
Info not provided by applicant	13%	53%	4%	24%	14%	4%
Not Applicable	0%	33%	0%	67%	0%	0%
Racial/Ethnic Comparison						
Hispanic/Latino or Not Hispanic/Not Latino	-72%	-10%	2%	5%	2%	1%

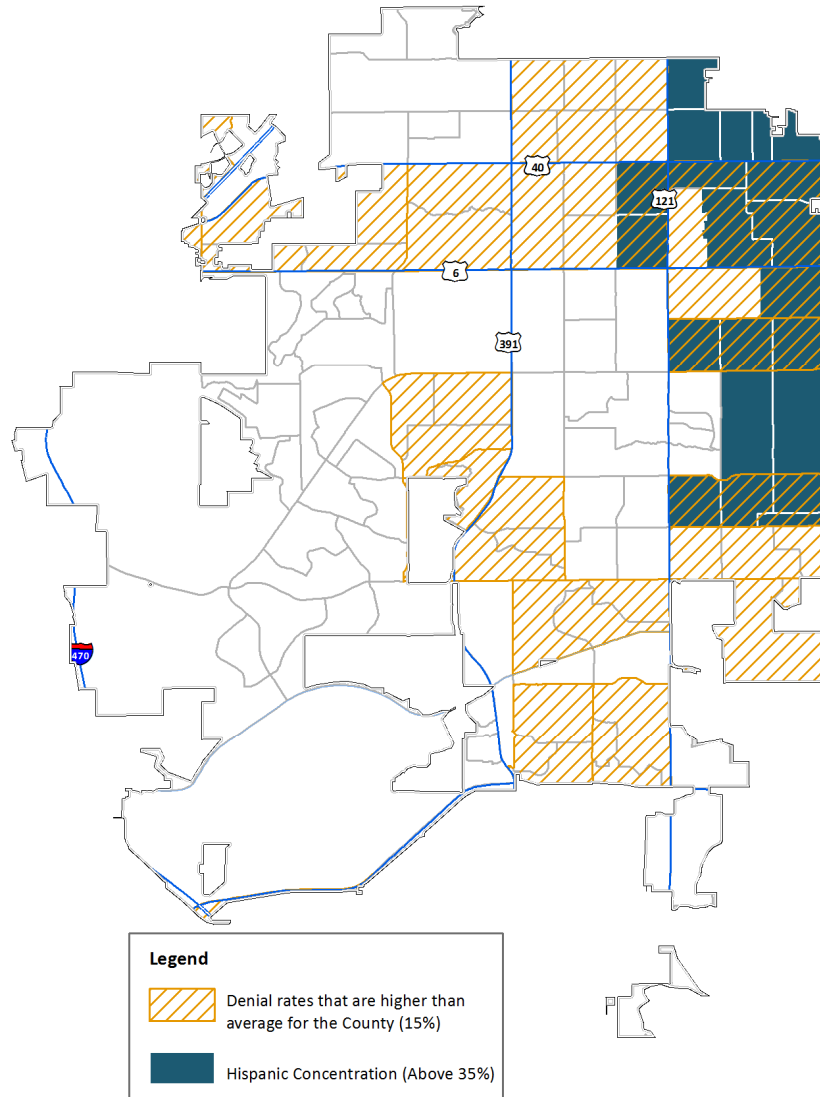
Source: Home Mortgage Disclosure Act (HMDA), 2010.

Figure ES-16 examines Hispanic concentration and denial rates in the City of Lakewood. The crosshatch designates Census Tracts with higher denial rates than for the county overall. As the Figure demonstrates, many—but not all—areas with high denial rates are also areas of Hispanic concentration. These areas are also many of the city’s low and moderate income areas.

Figure ES-16.
Loan Denials and
Hispanic Concentration,
City of Lakewood, 2010

Source:

Home Mortgage Disclosure Act
(HMDA), 2010, and BBC Research &
Consulting.



As demonstrated in Figure ES-17, high debt-to-income ratios and inadequate collateral are the primary reasons for application denials across race and loan type in Lakewood. For Hispanic and Asian applicants, credit history was also a common reason for application denials. African American applicants in the City of Lakewood were denied at a rate 15 percentage points higher than Jefferson County residents as a whole for collateral reasons, and Asians denials were 10 percentage points higher for credit history reasons.

**Figure ES-17.
Reasons for Denial
by Loan Type and
Race/Ethnicity, City of
Lakewood, 2010**

Source:
Home Mortgage Disclosure Act
(HMDA), 2010.

City of Lakewood	Asian	Black or African American	White	Hispanic or Latino
Debt-to-income ratio	30%	20%	23%	24%
Employment history	0%	0%	2%	2%
Credit history	20%	0%	15%	20%
Collateral	15%	40%	18%	18%
Insufficient cash	0%	0%	2%	2%
Unverifiable information	8%	0%	10%	11%
Credit application incomplete	15%	0%	13%	9%
Mortgage insurance denied	0%	0%	0%	0%
Other	13%	40%	17%	14%
Total	100%	100%	100%	100%

2013 Impediments to Fair Housing Choice and Fair Housing Action Plan

This section identifies the impediments to fair housing choice for the 2013 City of Lakewood AI. Some of the impediments listed below also apply to the county overall or for other cities within the county. Impediments for the county and other cities are detailed in the full AI for Jefferson County, Lakewood and Arvada.

IMPEDIMENT NO. 1—There is inadequate access to transit, housing and businesses along major corridors for people with disabilities.

Persons with disabilities who participated in the public process for the AI talked often about the challenges they face accessing public transit, bus shelters and housing, both along major corridors and within the city's many neighborhoods that lack sidewalks. Colfax Avenue was mentioned as being very problematic for its broken sidewalks, obstructions (e.g., utility poles) in the middle of sidewalks and inadequately cleared sidewalks during winter. In addition, snow that is plowed from Colfax Avenue onto sidewalks often blocks wheelchair access to bus shelters, businesses and housing.

Why is this an impediment? Limited transit may create an impediment to fair housing choice because it could have the effect of preventing certain protected classes from accessing housing, employment, services and amenities at the same level as other residents.

IMPEDIMENT NO. 2—Lack of accessible housing limits the housing choices of persons with physical disabilities and mobility limitations.

Evidence of this barrier was found in both qualitative and quantitative data obtained for the AI.

Lack of accessible housing for persons with disabilities was raised frequently by residents and stakeholders participating in the AI:²

- 27 percent of survey respondents who are disabled said their current home or apartment does not meet their accessibility needs.
- 69 percent of stakeholders responding to the survey said that the availability of accessible housing units for persons with disabilities was “insufficient.”
- The majority of attendees attending the AI community meeting needed wheelchair accessible housing and each mentioned the challenges they had finding accessible, affordable housing—often apartments that accept Section 8 vouchers.

Open ended survey comments concerning the lack of accessible housing included the following:

- “As someone who works in the field of disability and is a parent of an adult with a disability, I have found housing barriers to be one of the biggest challenges to the potential for individuals to become a contributory member of their chosen communities.”
- “We have extremely limited options for affordable housing and for housing for persons with disabilities.”
- “[The county needs] more accessible (wheelchair), more affordable, better locations, closer to bus lines.”
- “[The county needs] homes for older adults with intellectual/development disabilities who also have medical needs.”

Quantitative data from the Metro Denver Apartment Association quarterly survey and area housing authorities provide further evidence of the lack of and demand for accessible housing:

- The Apartment Association survey reports that accessible 1 bedroom units rent for about \$145 more on average than non-accessible units. Larger accessible units, however, are less expensive than non-accessible units; this is mostly true for those with 4 to 5 bedrooms. These data suggest that demand for 1 bedroom accessible units is higher than for 1 bedroom non-accessible units because these units are difficult to find in the currently very tight rental market.
- Metro West Housing Solutions reports more than 500 persons with disabilities on their wait list for Section 8 vouchers, about 20 percent of households on the wait list. Twenty-three percent of households (116) on the Arvada Housing Authority’s wait list are disabled. These households in need of affordable housing make up more than the county’s overall proportion of persons with disabilities (9%).

² These statistics represent all residents responding to the AI survey, not exclusively residents of Lakewood. There were too few surveys received back from residents in the individual jurisdictions within the county to analyze the results at the jurisdiction level.

Why is this an impediment? Lack of accessible housing impedes housing choice for people with disabilities.

IMPEDIMENT NO. 3—Lack of affordable housing opportunities in some parts of the county may lead to increased racial and ethnic concentrations and disproportionately impact Hispanic and residents with disabilities. It should be noted that this countywide impediment—which has been exacerbated by the increasingly tight rental market—pertains less to Lakewood (as well as Edgewater, Mountain View and Wheat Ridge) than other parts of the county, as Lakewood has some of the county’s most affordable housing options, contains much of the county’s areas of Hispanic concentration and has ethnic diversity.

However, the increasing concentration of affordable housing as a result of the tightening housing market has occurred within the city limits of Lakewood, according to housing authority officials, as well as throughout the county.

Specifically, the growing lack of affordable rental housing opportunities outside of low income areas has led to an increased clustering of Section 8 voucher holders in lower income areas. The housing market data suggest that the ethnic concentration in the county is at least partially related to limited affordable housing.

Although there are no areas of concentrated poverty in the city (and thus, no racially/ethnically concentrated areas of poverty), many of the areas with Hispanic concentration have higher than average poverty rates. In addition, Hispanic residents have a poverty rate that is three times higher than non-Hispanic residents. Therefore, because Hispanics are more likely than non-Hispanics to live in poverty, the lack of affordable housing opportunities may disparately impact Hispanic residents. This is also true of persons with disabilities, who have higher poverty rates and lower incomes than non-disabled residents because of their limited ability to work.

It is also important to note that there are many factors affecting affordability that are beyond local government control—such as demand for rental housing, private sector developer willingness to build and mortgage interest rates. The county and city are limited in their ability to influence housing costs beyond reducing regulatory barriers, funding affordable housing developments and providing development incentives for affordable housing creation.

Why is this an impediment? It is acknowledged that concentrations of protected classes may or may not be a fair housing impediment. Some residents will choose to live near people who have similar household characteristics and cultural backgrounds and beliefs.

Yet concentrations that are driven or perpetuated by lack of affordable housing—especially if the lack of affordable housing disparately impacts protected classes—an impediment to housing choice is created. Disparate impact can occur when racial and ethnic minorities, or persons with disabilities, have lower incomes and higher rates of poverty.

IMPEDIMENT NO. 4—Fair housing information is difficult to find and is not in a language other than English. Fair housing awareness is low.

A review of the county's, Lakewood's and Arvada's websites found that fair housing information can be difficult to find; most of the time it is located under community development program web pages. A resident who has experienced discrimination or wants more information about their rights is unlikely to look for the information under "CDBG" or "community development programs." Searches on the websites found some documents pertaining to fair housing, but few provided information about who to contact about housing discrimination. None of the information was available in Spanish.

Similar reviews of the Jefferson County Housing Authority and MWHS websites found no fair housing resources and little information in languages other than English (it is acknowledged that front office staff are bilingual).

In addition, the stakeholder survey conducted for the AI found that knowledge and awareness of protected classes by stakeholders is low and residents are mostly likely to "do nothing" when faced with discrimination. These responses indicate a need for a broader and concerted effort to educate stakeholders and residents about fair housing laws and rights.

Why is this an impediment? Inadequate information on fair housing can create barriers to fair housing choice if the lack of the information denies residents the opportunity to report housing violations. In addition, lack of fair housing information in accessible formats can disproportionately impact non-English speakers and persons with disabilities.

OBSERVATION NO. 5—NIMBYism may create impediments to fair housing choice.

Not-in-My-Backyard Syndrome, or NIMBYism, can create significant barriers for affordable housing development and may be directed towards or disparately impact protected classes. The survey conducted for this AI detected a fair amount of NIMBYism among Jefferson County residents.³ Specifically:

- Twenty-percent said they would prefer "fewer rental units/rentals" in their neighborhoods,
- Twelve percent said they would prefer "fewer low income/poor people,"
- Thirty percent of stakeholders attributed concentrations of low income housing to NIMBYism.

Affordable housing developers interviewed for this study described several cases of NIMBYism associated with proposed affordable housing developments which resulted in the projects not moving forward or significant development delays.

Why is this an observation rather than an impediment? It is unclear if NIMBYism has a disparate impact on the housing opportunities of protected classes or how widespread NIMBYism is in Lakewood.

³ Too few responses were received at the jurisdictional level to analyze by city.

IMPEDIMENT NO. 6—Services for persons who are homeless—as well as federal resources to fund needed services—are limited.

The lack of emergency shelters and transitional housing for the homeless was raised often by attendees at the community meeting conducted for the AI. Overall, Jefferson County and its cities offer very limited resources for persons who are homeless; motels and shelters in Denver serve most of the demand for housing for the homeless.

The county and its cities find it difficult to expand shelters and housing services for persons who are homeless due to federal fiscal restraints. Serving persons who are homeless requires deep subsidies and many levels (federal, state, local) of public resources.

Why is this an impediment? Persons who are homeless in Jefferson County are disproportionately likely to be racial and ethnic minorities and persons with disabilities.

Recommended Fair Housing Action Plan

To address the fair housing impediments described above, it is recommended that Lakewood consider the following Fair Housing Action Plan (FHAP). Action items for the county and other cities are included for context.

ACTION ITEM NO. 1—Improve accessibility of major roads and corridors. Make sidewalks and bus stops easier to access and use for persons with disabilities.

This activity will also benefit persons without disabilities and further revitalization efforts by making neighborhoods more pedestrian- and recreation-friendly.

The City of Lakewood should identify areas along Colfax that need accessibility improvements and better access to bus shelters, especially during the winter when snow removal on the streets can block bus shelters.⁴

The residents who participated in the community meeting for the AI suggested that the city focus on major thoroughfares like Colfax, Wadsworth and Kipling, ensure that sidewalks are wide enough to accommodate a wide variety of non-auto uses (bicycles, skateboards, roller blades, wheelchairs, pedestrians) and encouraged off street paths with signage to access.

When possible, the city will construct “missing link” sidewalk and bicycle connections to light rail stations and on arterial and collector streets, with emphasis on links to existing bus stops, schools, recreation centers and facilities serving seniors and persons with disabilities. These projects are very expensive and adequate funding sources are often not available.

⁴ It is recognized that budget constraints may prevent immediate improvements to all areas of major corridors and that temporary fixes may be needed.

ACTION ITEM NO. 2—Improve the housing environment for people with disabilities. Lack of accessible, affordable housing was identified as an impediment to housing choice for persons with disabilities in Jefferson County, including Lakewood.

To increase housing opportunities for persons with disabilities, the county and its partner cities, including Lakewood, should consider the following:

- To the degree resources are available, continue to support nonprofit organizations that assist persons with disabilities find accessible housing, make accessibility improvements/reasonable accommodations and develop accessible, affordable housing.
- Encourage the production of “visitable,” accessible and affordable housing by private sector developers. Examples include: visitability ordinances (already adopted by Arvada) or policies, offering accessibility modifications as part of home repair programs (currently in place), exploring fee waivers and/or expedited review for affordable, accessible housing developments and/or donating land for such developments.
- Maintain a list of resources on city websites (or link to state websites maintained by CHFA and the Division of Housing and/or similar organizations) for people with disabilities—for example, information about rights concerning service animals, reasonable accommodations procedures, list accessible housing. This might be accomplished as part of the efforts of the Metro Denver Fair Housing Center.
- As part of preparation of HUD Consolidated Plans, Comprehensive Plans and similar documents, evaluate the need for accessible housing and housing for all types of persons with disabilities, including group homes, as well as transit.

ACTION ITEM NO. 3—Increase the supply of affordable housing and homeless resources in all areas of Jefferson County.

It is recommended that the county and cities continue or establish reasonable goals to support a balance of housing opportunities in all areas of the county, particularly affordable rental housing in high opportunity areas. This could include the following tasks:

- Encourage developments that incorporate a range of housing choices, particularly affordable rentals.
- Continue efforts to support mixed income housing developments along transit corridors and in high opportunity areas.
- Continue efforts to support nonprofit service and housing providers and expand support if federal dollars for housing and community development increase.
- To the extent that these activities can be directed to benefit protected classes this should be a priority.

ACTION ITEM NO. 4—Strengthen fair housing information, educational and training

opportunities. Jefferson County and its jurisdictions, including Lakewood, should increase the availability, access and volume of fair housing information and educational opportunities in the county through exploring activities such as those listed below.

- If the Metro Denver Fair Housing Center offers education and outreach activities to residents and landlords, support through suggesting venues, publicizing events and providing other types of non-financial assistance.
- Keep new staff abreast of fair housing resources and information. Arvada's provision of training to staff on accommodating non-English speakers, persons who are hearing impaired and people with other types of disabilities is a good model for disseminating such information and should be continued.
- Add visible, easy to understand fair housing information on city websites or links to websites.

The information should be prominent and contain links to CCRD and HUD at

- <http://www.colorado.gov/cs/Satellite?c=Page&childpagename=DORA-DCR%2FDORALayout&cid=1251614735957&pagename=CBONWrapper>
- http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp

Examples of local government websites with good fair housing information include:

- Douglas County: <http://www.douglas.co.us/cdbg/fair-housing/>
- City of Las Cruces: <http://www.las-cruces.org/Departments/Community%20Development/Sections/Planning%20and%20Neighborhoods/Housing%20and%20Family%20Services/Fair%20Housing.aspx>

FHAP Matrix

The following FHAP matrix summarizes Lakewood's action plan to address fair housing impediments, including the program years during which activities will be conducted.

Figure ES-18.
Fair Housing Action Plan Matrix, Goals and Accomplishments, City of Lakewood

Action Item	Lead Agency	Activities	Goals					Accomplishments				
			2013	2014	2015	2016	2017	2013	2014	2015	2016	2017
1. Improve accessibility of major roads and corridors. Make sidewalks and bus stops easier to access and use for persons with disabilities.	City of Lakewood	- Identify areas along Colfax that need accessibility improvements and better access to bus shelters.				X						
		- When possible, construct “missing link” sidewalk and bicycle connections to light rail stations and on arterial and collector streets. Emphasize links to existing bus stops, schools, recreation centers, and facilities serving seniors and persons with disabilities.					X					
2. Improve the housing environment for people with disabilities.	City of Lakewood	- Support nonprofit organizations that assist persons with disabilities find accessible housing, make accessibility improvements/ reasonable accommodations, and develop accessible, affordable housing.					X					
		- Encourage the production of “visitable,” accessible, and affordable housing by private sector developers.					X					
		With Jefferson County, continue to evaluate the need for accessible housing and housing for all types of persons with disabilities, including group homes, as well as transit.					X					
	Jefferson County	- Develop fair housing resource materials and/or informational links for persons with disabilities on county website; link to city websites.										
		- Continue to evaluate the need for accessible housing and housing for all types of persons with disabilities, including group homes, as well as transit.										

Figure ES-18. (CONTINUED)
Fair Housing Action Plan Matrix, Goals and Accomplishments, City of Lakewood

Action Item	Lead Agency	Activities	Goals					Accomplishments				
			2013	2014	2015	2016	2017	2013	2014	2015	2016	2017
3. Increase the supply of affordable housing and homeless resources.	City of Lakewood	- Encourage developments that incorporate a range of housing choices, particularly affordable rentals.					X					
		- Continue efforts to support mixed income housing developments along transit corridors and in high opportunity areas.					X					
		- Continue efforts to support nonprofit service and housing providers with homeless services and expand support if federal dollars for housing and community development increase.					X					
4. Strengthen fair housing information, educational and training opportunities.	City of Lakewood	- Participate in regional fair housing training for residents and staff.					X					
		- Add visible, easy to understand fair housing information on city website.				X						

Source: BBC Research & Consulting and City of Lakewood.